



Recycled Water Project

August 2014



City of Pleasanton Recycled Water Project

Final Initial Study / Mitigated Negative Declaration
SCH # 2014062084

Prepared by:



SMB Environmental, Inc.

August 2014

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Chapter 1 Introduction

Pursuant to the California Environmental Quality Act (CEQA; Public Resources Code Section 21000, et seq. and CEQA Guidelines), the City of Pleasanton (City) prepared a Public Draft Initial Study/Mitigated Negative Declaration (IS/MND) to evaluate potential environmental impacts associated with the City's proposed recycled Water (Proposed Project). The purpose of the Proposed Project/Action is to construct and operate a new recycled water system to replace/augment existing irrigation supplies in the City's service area. The development of recycled water service within the City will lessen the demand for Zone 7 Water Agency (Zone 7) potable water supplies and help the City meet the State of California's Water Conservation Act of 2009, which requires a 20 percent reduction in urban per capita water use by the year 2020. Furthermore, the addition of recycled water to the City's water supply portfolio will increase its water system's reliability since recycled water is a local supply within the City's control and is drought-resistant.

On June 26, 2014, to initiate public review of the Draft IS/MND, the City filed a Notice of Completion (NOC) for the project with the Governor's Office of Planning and Research (State Clearinghouse or SCH) and the County of Alameda and released the Draft IS/MND for a 30-day public review. The State Clearinghouse identified the project with SCH #2014062084. The 30-day public review period was established between June 28 and July 28, 2014, with copies of the Draft IS/MND available for review on the City's website at <http://www.cityofpleasanton.gov>, the City of Pleasanton Library 400 Old Bernal Avenue, Pleasanton, CA 94566, and at the City of Pleasanton, Operation Center Counter, 3333 Busch Road, Pleasanton, CA 94566.

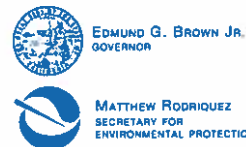
This Final IS/MND was prepared according to CEQA Guidelines and considers and incorporates all comments received by the State Clearinghouse and other agencies during the 30-day public review period. The purpose of this document is to clarify facts set forth in the Public Draft IS/MND, as necessary, to ensure accuracy. The City must consider the IS/MND, together with any comments received, before approving the Proposed Project (Public Resources Code Section 21091(f); and CEQA Guidelines Section 15074). The City has no affirmative duty to prepare formal responses to comments on the Public IS/MND, but should have adequate information on the record explaining why the comment(s) do/does not affect the conclusion that there are no potential significant environmental effects. The City is required to, however, notify, in writing, any commenting agencies of the date of the public hearing on the Proposed Project for which an IS/MND is prepared and will be decided upon for approval (Public Resources Code Section 21092.5(b); and CEQA Guideline Section 15073).

This Final IS/MND is being distributed to agencies, stakeholder organizations, and individuals who commented on the Public Draft IS/MND to ensure that interested parties have an opportunity to express their views regarding the environmental impacts of the project, and to ensure that information pertinent to permits and approvals is provided to decision makers for the City and CEQA responsible agencies. Both written comments and oral testimony from the public hearing have been incorporated into the Final IS/MND for the City Council to consider whether to approve the Proposed Project. **The City is scheduled to make a final decision on the Proposed Project at its regularly scheduled City Council Meeting on September 16, 2014 at 7:00 p.m. in the Council Chambers, 200 Old Bernal Avenue, Pleasanton, CA 94566.**

Chapter 2 Comments Received

During the 30-day public review period (June 28, 2014 through July 28, 2014), the City received a total of three (3) comment letters on the Proposed Project. The City has reviewed and considered the comments from each agency as follows in Table 2-1 below. The letters are attached.

TABLE 2-1 AGENCY COMMENT LETTERS RECEIVED		
Date	Commenting Agency	Comment Letter
July 18, 2014	Ahmad Kaskoli, Senior Environmental Scientist State Water Resources Control Board 1001 I Street Sacramento, CA 95814	A
July 21, 2014	Erik Alm, AICP, District Branch Chief California Department of Transportation, District 4 111 Grand Avenue Oakland, CA 94623-0660	B
July 25, 2014	Elke Rank Alameda County Flood Control and Water Conservation District, Zone 7 100 North Canyons Parkway Livermore, CA 94551	C



State Water Resources Control Board

JUL 18 2014

Rita Di Candia
 City of Pleasanton
 3333 Busch Avenue
 Pleasanton CA 94566

Dear Ms. Di Candia:

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) FOR CITY OF PLEASANTON (CITY); CITY OF PLEASANTON RECYCLED WATER PROJECT (PROJECT); ALAMEDA COUNTY; STATE CLEARINGHOUSE NO. 2014062084

We understand that the City may be pursuing Clean Water State Revolving Fund (CWSRF) financing for this Project. As a funding agency and a state agency with jurisdiction by law to preserve, enhance, and restore the quality of California’s water resources, the State Water Resources Control Board (State Water Board) is providing the following information and comments for the environmental document prepared for the Project.

A-1

The CWSRF Program is partially funded by the United States Environmental Protection Agency and requires additional “CEQA-Plus” environmental documentation and review. Three enclosures are included that further explain the CWSRF Program environmental review process and the additional federal requirements. For the complete environmental application package, please visit: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml. The State Water Board is required to consult directly with agencies responsible for implementing federal environmental laws and regulations. Any environmental issues raised by federal agencies or their representatives will need to be resolved prior to State Water Board approval of a CWSRF financing commitment for the proposed Project. For further information on the CWSRF Program, please contact Mr. Ahmad Kashkoli, at (916) 341-5855.

It is important to note that prior to a CWSRF financing commitment, projects are subject to provisions of the Federal Endangered Species Act (ESA), and must obtain Section 7 clearance from the United States Department of the Interior, Fish and Wildlife Service (USFWS), and/or the United States Department of Commerce National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS) for any potential effects to special status species.

Please be advised that the State Water Board will consult with the USFWS, and/or the NMFS regarding all federal special-status species that the Project has the potential to impact if the Project is to be financed by the CWSRF Program. The City will need to identify whether the Project will involve any direct effects from construction activities, or indirect effects such as growth inducement, that may affect federally listed threatened, endangered, or candidate species that are known, or have a potential to occur in the Project site, in the surrounding areas, or in the service area, and to identify applicable conservation measures to reduce such effects.

In addition, CWSRF projects must comply with federal laws pertaining to cultural resources, specifically Section 106 of the National Historic Preservation Act (Section 106). The State Water Board has responsibility for ensuring compliance with Section 106 and the State Water Board must consult directly with the California State Historic Preservation Officer (SHPO). SHPO consultation is initiated when sufficient information is provided by the CWSRF applicant. The City must retain a consultant that meets the Secretary of the Interior's Professional Qualifications Standards (http://www.nps.gov/history/local-law/arch_stnds_9.htm) to prepare a Section 106 compliance report.

Note that the City will need to identify the Area of Potential Effects (APE), including construction and staging areas, and the depth of any excavation. The APE is three-dimensional and includes all areas that may be affected by the Project. The APE includes the surface area and extends below ground to the depth of any Project excavations. The records search request should extend to a ½-mile beyond the Project APE. The appropriate area varies for different projects but should be drawn large enough to provide information on what types of sites may exist in the vicinity.

Other federal environmental requirements pertinent to the Project under the CWSRF Program include the following (for a complete list of all environmental requirements please visit: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/forms/application_environmental_package.pdf):

- A. Compliance with the Federal Clean Air Act: (a) Provide air quality studies that may have been done for the Project; and (b) if the Project is in a nonattainment area or attainment area subject to a maintenance plan; (i) provide a summary of the estimated emissions (in tons per year) that are expected from both the construction and operation of the Project for each federal criteria pollutant in a nonattainment or maintenance area, and indicate if the nonattainment designation is moderate, serious, or severe (if applicable); (ii) if emissions are above the federal de minimis levels, but the Project is sized to meet only the needs of current population projections that are used in the approved State Implementation Plan for air quality, quantitatively indicate how the proposed capacity increase was calculated using population projections.
- B. Compliance with the Coastal Zone Management Act: Identify whether the Project is within a coastal zone and the status of any coordination with the California Coastal Commission.
- C. Protection of Wetlands: Identify any portion of the proposed Project area that should be evaluated for wetlands or United States waters delineation by the United States Army Corps of Engineers (USACE), or requires a permit from the USACE, and identify the status of coordination with the USACE.
- D. Compliance with the Farmland Protection Policy Act: Identify whether the Project will result in the conversion of farmland. State the status of farmland (Prime, Unique, or Local Statewide Importance) in the Project area and determine if this area is under a Williamson Act Contract.
- E. Compliance with the Migratory Bird Treaty Act: List any birds protected under this act that may be impacted by the Project and identify conservation measures to minimize impacts.
- F. Compliance with the Flood Plain Management Act: Identify whether or not the Project is in a Flood Management Zone and include a copy of the Federal Emergency Management Agency flood zone maps for the area.
- G. Compliance with the Wild and Scenic Rivers Act: Identify whether or not any Wild and Scenic Rivers would be potentially impacted by the Project and include conservation measures to minimize such impacts.

Please provide us with the following documents applicable to the proposed Project if seeking CWSRF or other State Water Board funding: (1) one copy of the draft and final IS/MND, (2) the resolution adopting the IS/MND and a Mitigation Monitoring and Reporting Program (MMRP) making California Environmental Quality Act (CEQA) findings, (3) all comments received during the review period and the City's response to those comments, (4) the adopted MMRP, and (5) the Notice of Determination filed with the Alameda County Clerk and the Governor's Office of Planning and Research, State Clearinghouse. In addition, we would appreciate notices of any hearings or meetings held regarding environmental review of any projects to be funded by the State Water Board.

Thank you for the opportunity to review the City's draft IS/MND. If you have any questions or concerns, please feel free to contact me at (916) 341-5855, or by email at Ahmad.Kashkoli@waterboards.ca.gov, or contact Linda Han at (916) 341-7388, or by email at Linda.Han@waterboards.ca.gov.

Sincerely,



Ahmad Kashkoli
Senior Environmental Scientist

Enclosures (3)

1. Clean Water State Revolving Fund Environmental Review Requirements
2. Quick Reference Guide to CEQA Requirements for State Revolving Fund Loans
3. Basic Criteria for Cultural Resources Reports

cc: State Clearinghouse
(Re: SCH# 2014062084)
P.O. Box 3044
Sacramento, CA 95812-3044

ENVIRONMENTAL REVIEW REQUIREMENTS

The Clean Water State Revolving Fund (CWSRF) Program is partially funded by the United States Environmental Protection Agency (EPA), and is subject to federal environmental regulations as well as the California Environmental Quality Act (CEQA). All applicants seeking CWSRF financing must comply with both CEQA and the federal cross-cutting regulations. The "Environmental Package" provides the forms and instructions needed to complete the environmental review requirements for CWSRF financing. The forms and instructions are available at: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srfsrff_forms.shtml.

Lead Agency/Applicant

The applicant will generally act as the "Lead Agency" for environmental review. It will prepare, circulate, and consider the environmental documents prior to approving the project. It also provides the State Water Board with copies of the CEQA documents, and a completed "Environmental Evaluation Form for Environmental Review and Federal Coordination" (http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srff/docs/forms/application_environmental_package.pdf) with supporting documents as part of the "Environmental Package."

Responsible Agency/State Water Board

The State Water Board acts on behalf of EPA to review and consider the environmental documents before approving financing. The State Water Board may require additional studies or documentation to make its own CEQA findings, as well as circulate CEQA documents and other environmental reports to relevant federal agencies for consultation before making a determination about the project financing.

The Applicant must address all relevant federal agencies' comments before project financing is approved.

FEDERAL CROSS-CUTTING REGULATIONS

The CWSRF Program requires consultation with relevant federal agencies on the following federal environmental regulations, if applicable to the project:

- Clean Air Act
- Coastal Barriers Resources Act
- Coastal Zone Management Act
- Endangered Species Act
- Environmental Justice
- Farmland Protection Policy Act
- Floodplain Management
- Magnuson-Stevens Fishery Conservation and Management Act
- Migratory Bird Treaty Act
- National Historic Preservation Act
- Protection of Wetlands
- Safe Drinking Water Act, Sole Source Aquifer Protection
- Wild and Scenic Rivers Act

The following is a brief overview of requirements for some of the key regulations.

Clean Air Act (CAA)

The CAA general conformity analysis only applies to projects in areas not meeting the National Ambient Air Quality Standards or subject to a maintenance plan.

If project emissions are below the federal "de minimis" levels then:

- A general conformity analysis is not required.

If project emissions are above the federal "de minimis" levels then:

- A general conformity determination for the project must be made. A general conformity determination can be made if facilities are sized to meet the needs of current population projections used in an approved State Implementation Plan for air quality.

- Using population projections, applicants must explain how the proposed capacity increase was calculated. An air quality modeling analysis is necessary of all projects for the following criteria pollutants, regardless of attainment status:

- Carbon monoxide
- Lead
- Oxides of nitrogen
- Ozone
- Particulate matter (PM2.5 and PM10)
- Sulfur dioxide

Endangered Species Act (ESA)

The ESA requires an analysis of the effects on federally listed species. The State Water Board will determine the project's potential effects on federally listed species, and will initiate informal/formal consultation with the United States Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service, as necessary under Section 7 of the ESA.

Required Documents:

- ✓ A species list, less than one year old, from the USFWS and the California Department of Fish and Wildlife's Natural Diversity Database;
- ✓ A biological survey conducted during the appropriate time of year;
- ✓ Maps or documents (biological reports or biological assessments, if necessary); and
- ✓ An assessment of the direct or indirect impacts to any federally listed species and/or critical habitat. If no effects are expected, explain why and provide the supporting evidence.



National Historic Preservation Act (NHPA)

Section 106 of the NHPA requires an analysis of the effects on "historic properties." The Section 106 process is designed to accommodate historic preservation concerns for federal actions with the potential to affect historic properties. Early consultation with appropriate government agencies, Indian tribes, and members of the public, will ensure that their views and concerns are addressed during the planning phase.

Historic properties (i.e., buildings, structures, objects, and archaeological sites 50 years or older) are properties that are included in the National Register of Historic Places or meet the criteria for the National Register.

Required Documents:

- ✓ A draft State Historic Preservation Officer consultation request letter; and
- ✓ A cultural resources report on historic properties conducted according to the Secretary of the Interior's Standards, including:
 - A clearly defined Area of Potential Effect (APE), specifying the length, width, and depth of excavation, with a map clearly illustrating the project APE;
 - A records search, less than one year old, extending to a half-mile beyond the project APE;
 - Written description of field methods;
 - Identification and evaluation of historic properties within the project's APE; and
 - Documentation of consultation with the Native American Heritage Commission and local Native American tribes.

ADDITIONAL INFORMATION

If your project has the potential to affect biological resources or historic properties, the consultation process can be lengthy. Please contact the State Water Board staff early in your planning process to discuss what additional information may be needed for your specific project.

Please contact your State Water Board Project Manager or Mr. Ahmad Kashkoli at (916) 341-5855 or Ahmad.Kashkoli@waterboards.ca.gov for more information related to the CWSRF Program environmental review process and requirements.



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to keep California's **water clean.**
CLEAN WATER STATE REVOLVING FUND



www.waterboards.ca.gov

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Environmental Review Requirements

State Water Resources Control Board
Division of Financial Assistance

California Environmental Quality Act Requirements

State Water Resources Control Board
Division of Financial Assistance

The State Water Resources Control Board (State Water Board), Division of Financial Assistance, administers the Clean Water State Revolving Fund (CWSRF) Program. The CWSRF Program is partially funded by grants from the United States Environmental Protection Agency. All applicants seeking CWSRF financing must comply with the California Environmental Quality Act (CEQA), and provide sufficient information so that the State Water Board can document compliance with federal environmental laws. The "Environmental Package" provides the forms and instructions needed to complete the environmental review requirements for CWSRF Program financing. It is available at: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml



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to keep California's **water clean.**
CLEAN WATER STATE REVOLVING FUND

Contact Information: For more information related to the CWSRF Program environmental review process and requirements, please contact your State Water Board Project Manager or Mr. Ahmad Kashkoli at 916-341-5855 or Ahmad.Kashkoli@waterboards.ca.gov

LEAD AGENCY

The applicant is usually the "Lead Agency" and must prepare and circulate an environmental document before approving a project. Only a public agency, such as a local, regional or state government, may be the "Lead Agency" under CEQA. If a project will be completed by a non-governmental organization, "Lead Agency" responsibility goes to the first public agency providing discretionary approval for the project.

RESPONSIBLE AGENCY

The State Water Board is generally a "Responsible Agency" under CEQA. As a "Responsible Agency," the State Water Board must make findings based on information provided by the "Lead Agency" before financing a project.

ENVIRONMENTAL REVIEW

The State Water Board's environmental review of the project's compliance with both CEQA and federal cross-cutting regulations must be completed before a project can be financed by the CWSRF Program.

DOCUMENT REVIEW

Applicants are encouraged to consult with State Water Board staff early during preparation of CEQA document if considering CWSRF financing. Applicants shall also send their environmental documents to the State Water Board, Environmental Review Unit during the CEQA public review period. This way, any environmental concerns can be addressed early in the process.

REQUIRED DOCUMENTS

The Environmental Review Unit requires the documents listed below to make findings and complete its environmental review. Once the State Water Board receives all the required documents and makes its own findings, the environmental review for the project will be complete.

- ✓ Draft and Final Environmental Documents: Environmental Impact Report, Negative Declaration, and Mitigated Negative Declaration as appropriate to the project
- ✓ Resolution adopting/certifying the environmental document, making CEQA findings, and approving the project
- ✓ All comments received during the public review period and the "Lead Agency's" responses to those comments
- ✓ Adopted Mitigation Monitoring and Reporting Plan, if applicable
- ✓ Date-stamped copy of the Notice of Determination or Notice of Exemption filed with the County Clerk(s) and the Governor's Office of Planning and Research
- ✓ CWSRF Evaluation Form for Environmental Review and Federal Coordination with supporting documents

Basic Criteria for Cultural Resources Report Preparation

State Water Resources Control Board
Division of Financial Assistance

For Section 106 Consultation with the State Historic Preservation Officer (SHPO)
under the National Historic Preservation Act

CULTURAL RESOURCES REPORT

The Cultural Resources Report must be prepared by a qualified researcher that meets the Secretary of the Interior's Professional Qualifications Standards. Please see the Professional Qualifications Standards at the following website at: http://www.cr.nps.gov/local-law/arch_stnds_9.htm

The Cultural Resources Report should include one of the four "findings" listed in Section 106. These include:

"No historic properties affected"

(no properties are within the area of potential effect (APE; including below the ground).

"No effect to historic properties"

(properties may be near the APE, but the project will not have any adverse effects).

"No adverse effect to historic properties"

(the project may affect "historic properties", but the effects will not be adverse).

"Adverse effect to historic properties"

Note: Consultation with the SHPO will be required if a "no adverse effect to historic properties" or an "adverse effect to historic properties" determination is made, to develop and evaluate alternatives or modifications to the proposed project that could avoid, minimize or mitigate adverse effects on "historic properties."

RECORDS SEARCH

- A records search (less than one year old) extending to a half-mile beyond the project APE from a geographically appropriate Information Center is required. The records search should include maps that show all recorded sites and surveys in relation to the APE for the proposed project, and copies of the confidential site records included as an appendix to the Cultural Resources Report.
- The APE is three-dimensional (depth, length and width) and all areas (e.g., new construction, easements, staging areas, and access roads) directly affected by the proposed project.



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NATIVE AMERICAN and INTERESTED PARTY CONSULTATION

- Native American and interested party consultation should be initiated at the planning phase of the proposed project to gather information to assist with the preparation of an adequate Cultural Resources Report.
- The Native American Heritage Commission (NAHC) must be contacted to obtain documentation of a search of the Sacred Lands Files for or near the project APE.
- All local Native American tribal organizations or individuals identified by the NAHC must be contacted by certified mail, and the letter should include a map and a description of the proposed project.
- Follow-up contact should be made by telephone and a phone log maintained to document the contacts and responses.
- Letters of inquiry seeking historical information on the project area and local vicinity should be sent to local historical societies, preservation organizations, or individual members of the public with a demonstrated interest in the proposed project.

Copies of all documents mentioned above (project description, map, phone log and letters sent to the NAHC and Native American tribal organizations or individuals and interested parties) must be included in the Cultural Resources Report.

Contact Information: For more information related to the CWSRF Program Cultural Resources and Requirements, please contact Mr. Ahmad Kashkoli at 916-341-5855 or Ahmad.Kashkoli@waterboards.ca.gov

PRECAUTIONS

A finding of ***“no known resources”*** without supporting evidence is unacceptable. The Cultural Resources Report must identify resources within the APE or demonstrate with sufficient evidence that none are present.

“The area is sensitive for buried archaeological resources,” followed by a statement that ***“monitoring is recommended.”*** Monitoring is not an acceptable option without good-faith effort to demonstrate that no known resource is present.

If ***“the area is already disturbed by previous construction”*** documentation is still required to demonstrate that the proposed project will not affect “historic properties.” An existing road can be protecting a buried archaeological deposit or may itself be a “historic property.” Additionally, previous construction may have impacted an archaeological site that has not been previously documented.

SHPO CONSULTATION LETTER

Submit a draft consultation letter prepared by the qualified researcher with the Cultural Resources Report to the State Water Resources Control Board. A draft consultation letter template is available for download on the State Water Board webpage at: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/cwsrf_requirements.shtml



DEPARTMENT OF TRANSPORTATION

111 GRAND AVENUE
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-6053
FAX (510) 286-5559
TTY 711
www.dot.ca.gov



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July 21, 2014

ALAVAR027
SCH #2014062084

Ms. Rita Di Candia
City of Pleasanton
3333 Busch Avenue
Pleasanton, CA 94566

Dear Ms. Di Candia:

City of Pleasanton Recycled Water Project– Mitigated Negative Declaration

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the City of Pleasanton Recycled Water Project. The following comments are based on the Mitigated Negative Declaration (MND) we received on June 26, 2014. As the lead agency, the City of Pleasanton is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. This information should also be presented in the Mitigation Monitoring and Reporting Plan of the environmental document. Required roadway improvements should be completed prior to project completion. Since an encroachment permit is required for work in the State right of way (ROW), and Caltrans will not issue a permit until our concerns are adequately addressed, we strongly recommend that the City of Pleasanton work with both the applicant and Caltrans to ensure that our concerns are resolved during the California Environmental Quality Act (CEQA) process, and in any case prior to submittal of a permit application. Further comments will be provided during the encroachment permit process.

B-1

Geotechnical Issues

Activities involving demolition, reinforcement or rehabilitation of pipelines on which transportation facilities are built may potentially affect State transportation facilities. Also, built features on top of pipelines may contribute additional engineering considerations related to weight loading or compaction. These factors must be addressed through geotechnical and hydrological studies conducted in coordination with Caltrans at the project level.

B-2

Please provide a preliminary geotechnical investigation and report for sites involving Caltrans ROW. This should include characterization of the geological conditions and geotechnical information and recommendations to Caltrans regarding site preparation and grading, slopes, cuts and pavement design. This study should be reviewed by Caltrans's Geotechnical office since the proposed pipe lines may be established near Interstate 580 (I-580) and Interstate 680 (I-680), and the construction of the project involves excavation, grading, and drilling.

If the project is likely to be exposed to ground shaking, please provide a section on Strong Ground Shakings and please be aware that Projects that require a special design to mitigate seismic shaking should be considered "Less than Significant with Mitigation". Please also provide a section to reduce risk of damage from unstable soils.

Cultural Resources

There are no known archaeological sites within State ROW in the project area. However, should ground-disturbing activities take place as part of this project within State ROW and there is an inadvertent archaeological or burial discovery, in compliance with CEQA, PRC 5024.5, and Caltrans Standard Environmental Reference Chapter 2 (at <http://ser.dot.ca.gov>), all construction within 50 feet of the find shall cease. The Caltrans Office of Cultural Resource Studies, District 4, shall be immediately contacted at (510) 622-8808. A staff archaeologist will evaluate the find within one business day after contact. Archaeological resources may consist of, but are not limited to, dark, friable soils, charcoal, obsidian or chert flakes, grinding bowls, shell fragments, or deposits of bone, glass, metal, ceramics, or wood.

B-3

Transportation Management Plan

If it is determined that traffic restrictions and detours are needed on or affecting State highways, a Transportation Management Plan (TMP) or construction Traffic Impact Study (TIS) may be required of the developer for approval by Caltrans prior to construction. TMPs must be prepared in accordance with *California Manual on Uniform Traffic Control Devices*. Further information is available for download at the following web address:
<http://www.dot.ca.gov/hq/traffops/signtech/mutcdsupp/pdf/camutcd2012/Part6.pdf>.

B-4

Please ensure that such plans are also prepared in accordance with the transportation management plan requirements of the corresponding jurisdictions. For further TMP assistance, please contact the Office of Traffic Management Plans at (510) 286-4647.

Encroachment Permit

Page 2-6, Section 2.5 of the Public Draft IS/MND and EA/FONSI, City of Pleasanton Recycled Water Project, dated June 14, 2014 lists 3 agencies from whom potential permits and/or approvals may be required prior to construction of the Proposed Project/Action. In addition to the 3 agencies, please list Caltrans as a permitting agency.

B-5

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the address below. David Salladay, District Office Chief, Office of Permits,

Ms. Rita Di Candia/City of Pleasanton

July 21, 2014

Page 3

California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660.
Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the following website for more information:

<http://www.dot.ca.gov/hq/traffops/developserv/permits/>

Please feel free to call or email Luis Meléndez of my staff at (510) 286-5606 or Luis_Melendez@dot.ca.gov with any questions regarding this letter, as for any other assistance we may provide.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erik Alm", is written over a faint, illegible typed name.

ERIK ALM, AICP
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Comment Letter C



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

100 NORTH CANYONS PARKWAY • LIVERMORE, CA 94551 • PHONE (925) 454-5000 • FAX (925) 454-5727

July 25, 2014

Ms. Rita Di Candia
City of Pleasanton
P.O. Box 520
Pleasanton, CA 94566

Re: IS/MND for City of Pleasanton's Recycled Water Project

Rita,

First of all, Zone 7 would like to applaud the City of Pleasanton for moving forward with this recycled water project. Expanding the use of recycled water in the Livermore-Amador Valley is a critical part of a diversified water supply portfolio that assures reliable supplies even during drought periods and, as such, is fully supported by Zone 7. Such a project not only relieves stress on the potable water supplies of the community but also enhances quality of life for residents by providing an uninterrupted irrigation supply to parks and green belts.

C-1

We have reviewed the referenced IS/MND in the context of Zone 7's mission to provide drinking water, non-potable water for agriculture/irrigated turf, flood protection, and groundwater and stream management within the Livermore-Amador Valley. Please see attached for specific comments on the IS/MND for your consideration.

We appreciate the opportunity to comment on this project. If you have any questions on this letter, please feel free to contact me at (925) 454-5005 or via email at erank@zone7water.com.

Sincerely,

Elke Rank

cc: Jill Duerig, Carol Mahoney, Amparo Flores, Matt Katen, file

Zone 7 comments on IS/MND for City of Pleasanton's Recycled Water Project:

1. **General:** It is anticipated that the proposed facilities will cross or parallel existing Zone 7 pipelines; we would like to see the phased construction drawings as they are prepared to verify that Zone 7's facilities are correctly located. C-2
2. **Page 2-6, Section 2.6 No Project/Action Alternative:** It is likely that scenarios 1 and 2 would BOTH be needed. Consider using "and/or" to describe the need for one or both of these alternate scenarios. C-3
3. **Page 3-26, 3.8 Hydrology and Water Quality (a):** The evaluation should acknowledge that Zone 7 Water Agency, the local groundwater basin manager, developed a Salt Management Plan in 2005 to address salt loading to the basin, including impacts from recycled water. The plan is currently being updated (and re-named as the Salt and Nutrient Management Plan), to reflect current regulations and nutrient loading. C-4
4. **Page 3-26, 3.8 Hydrology and Water Quality (a):** You state "However, in context to the overall Main Basin that has a capacity of 250,000 acre-feet, this incremental increase is not considered to be a significant impact (i.e. 0.27 percent)." How was this value calculated? The more appropriate calculation for the impact on annual salt loading is: 675 tons salt per year /13,641 average total salt loading in tons per year¹ = 5%. C-5
5. **Page 3-26, Mitigation Measure HWQ-4:**
 - The first bulleted action item of this mitigation measure will not prevent the salt from the agronomic rate applications of recycled water from leaching to groundwater, but rather it limits the potential for significant amounts of salt to impact groundwater quality from the overuse of recycled water. However, if applied at the appropriate agronomic rate, it will allow the plants to take up other wastewater constituents such as nitrogen compounds rather than being leached to groundwater. Application of fertilizers should take into account the nutrient levels in the recycled water as well as plant demand. C-6
 - None of the four subsequent bulleted action items provide groundwater quality protection. A more appropriate mitigation measure would include complying with the State's General Waste Discharge Requirements of Recycled Water Use (Water Quality Order 2014-0090). This General Order has provisions for monitoring and reporting to assure compliance, and a requirement for the development of a salt and nutrient management plan or the participation in another agency's regional or sub-regional Salt and Nutrient Management Plan (SNMP), which Zone 7 has. Zone 7's SNMP considers the additional salt loading anticipated from Pleasanton's future recycled water and plan to construct a second groundwater demineralization facility to mitigate the additional salt loading from the increased imported water and recycled water use. The EIR should acknowledge the City's participation in Zone 7's SNMP development and state their support for its implementation, which includes a second demineralization facility as one of the mitigating measures. C-7
6. **Page 3-27, 3.8 Hydrology and Water Quality (a):** The summary of the discussion in item "a" should include a reference to the SNMP in addition to Mitigation Measure #HWQ 1-4 C-8

¹ Zone 7 Water Agency. May 2013. Annual Report for the Groundwater Management Program – 2012 Water Year (Table 4.3-2).

7. **Page 3-27, 3.8 Hydrology and Water Quality (a):** delete “or demineralization facilities”. A second demineralization facility is included in the SNMP as one of the mitigating measures. C-9
8. **Page 3-27, 3.8 Hydrology and Water Quality (b):** Consider re-writing the second to last sentence in item (b) as “In fact, the application of approximately 2,500 acre-feet of recycled water...” C-10
9. **Page 3-27, 3.8 Hydrology and Water Quality (e):** The IS/MND does not recognize the potential for recycled water use to “provide substantial additional sources of polluted runoff” yet the State does as evident in the State’s General Waste Discharge Requirements of Recycled Water Use. Compliance with the General Order noted earlier seems appropriate mitigation for this potential impact. Here the General Order requires irrigation at agronomic rates and periodic inspections as a means to limit runoff during irrigation, and monitoring and reporting as a means to assure compliance. C-11
10. **Page 3-34, 3.8 Hydrology and Water Quality (a):** Consider acknowledging here that the East Pleasanton Specific Plan water analysis refers to this recycled water offset as a source of supply. C-12

Chapter 3 Responses to Comments

This chapter evaluates the comments received during the 30-day public review period (June 28, 2014 through July 28, 2014). The City received a total of three (3) comment letters on the Proposed Project. The City has reviewed and considered the comments from each agency and provides a response to each of those comments as provided for below.

STATE WATER RESOURCES CONTROL BOARD

Comment A-1. Comment Noted. Yes, the City is contemplating formally applying for funding under the Clean Water State Revolving Fund (CWSRF). The City appreciates the State Water Board's role in administering the CWRSF program and fully understands that the program is partially funded by the United States Environmental Protection Agency (USEPA) and requires the additional CEQA-Plus environmental documentation and review. We appreciate the detailed information provided which will be required for formally applying for these funds. We have prepared the Public Draft IS/MND and EA/FONSI in such a way that the State Board and/or the U.S. Bureau of Reclamation (USBR) can use this document as a basis for complying with the necessary CEQA-Plus and/or NEPA requirements. If and when we formally apply for CWSRF or federal funds under USBR's Title XVI Water Reclamation and Reuse Program (Title XVI Program), we will gladly work with the State Water Board and/or USBR to work through any remaining issues. However, at this time, the City is moving forward with its CEQA process and responsibilities as the CEQA Lead Agency. As requested, the City will provide the State Water Board with any and all necessary documents when it formally applies for funding under the CWSRF Program.

CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)

Comment B-1. Comment Noted. The City will work with Caltrans to ensure that your concerns are resolved during the environmental review process and including prior to a submittal of an encroachment application. Please see the minor revisions and further clarification to Section 2.5 of the Public Draft IS/MND in Chapter 4 – Revisions to the Public Draft IS/MND to reflect potential additional permits that may be required from Caltrans.

Comment B-2. Comment Noted. As required, the City will provide a preliminary geotechnical investigation and report for sites involving a Caltrans right-of-way. Please see the minor revisions and further clarification to Section 2.5 of the Public Draft IS/MND in Chapter 4 – Revisions to the Public Draft IS/MND to reflect potential additional permits that may be required from Caltrans.

Comment B-3. Comment Noted. We agree that there are no known archaeological sites within in the project area. However, as noted in section 3.5 Cultural resources on pages 3-16 through 3-17, the City has several mitigation measures that anticipates the finding of undiscovered archeological resources and will halt work within 100 feet if cultural/archeological resources are discovered. We agree that archaeological resources may consist of, but are not limited to, dark, friable soils, charcoal, obsidian or chert flakes, grinding bowls, shell fragments, or deposits of bone, glass, metal, ceramics, or wood. Should ground-disturbing activities take place as part of this project within a State right-of-way and there is an archaeological or burial discovery, in compliance with CEQA, PRC 5024.5, and Caltrans Standard Environmental Reference Chapter 2 (at <http://ser.dot.ca.gov>), all construction within 50 feet of the find shall cease. The City will immediately contact the Caltrans Office of Cultural Resource Studies, District 4 at (510) 622-8808. The City understands that a Caltrans staff archaeologist will then evaluate the find within one business day after contact. Please see the minor revisions and further clarification to Section 2.5 of the Public Draft

IS/MND in Chapter 4 – Revisions to the Public Draft IS/MND to reflect potential additional permits that may be required from Caltrans.

Comment B-4. Comment Noted. Thank you for the information. If it is determined that traffic restrictions and detours are needed on or affecting State highways, the City will, at the appropriate time and prior to an encroachment permit application, provide Caltrans with a Traffic Impact Study or as further described as a Traffic Control Plan in Mitigation Measure TRA-1: Prepare and Implement Traffic Control Plan on pages 3-39 and 3-40 of the Public Draft IS/MND which will show/disclose, to the extent possible, the truck haul routes and trip generation rates for all scenarios affecting the state highway system. As required for any Caltrans permits, this plan/study will be prepared in accordance with the *California Manual on Uniform traffic Control Devices*.

Comment B-5. Comment Noted. The City will add Caltrans to the list of agencies from whom potential permits may be required prior to construction of the Proposed Project/Action. Please see the minor revisions and further clarification to Section 2.5 of the Public Draft IS/MND in Chapter 4 – Revisions to the Public Draft IS/MND to reflect potential additional permits that may be required from Caltrans.

ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

Comment C-1. Comment Noted. The City thanks you and the Alameda County Flood Control District, Zone 7 (Zone 7) for your support in our efforts in moving forward with this recycled water project. We agree that expanding the use of recycled water in the Livermore-Amador Valley is a critical part of a diversified water supply portfolio that assures reliable supplies even during drought periods. We believe that our Project will not only reduces stress on the potable water supplies of the community, but also enhances quality of life for residents by providing an uninterrupted irrigation supply to parks and green belts. Again we thank you for your support.

Comment C-2. Comment Noted. We agree that it is anticipated that the proposed facilities may cross or parallel existing Zone 7 pipelines. As such, and at the appropriate time, the City will provide Zone 7 with the phased construction drawings to verify that Zone 7's facilities are correctly located.

Comment C-3. Comment Noted. The City will add the phrase “and/or” to more accurately describe the need for one or both of the alternative scenarios. Please see the minor revisions and further clarification to Section 2.6 No Project/Action Alternative on page 2-6 in Chapter 4 – Revisions to the Public Draft IS/MND.

Comment C-4. Comment Noted. The City acknowledges that Zone 7 Water Agency, the local groundwater basin manager, developed a Salt Management Plan in 2005 to address salt loading to the basin, including impacts from recycled water. The plan is currently being updated (and re-named as the Salt and Nutrient Management Plan), to reflect current regulations and nutrient loading. Please see the minor revisions and further clarification to Section 3.8 Hydrology and Water Quality on page 3-26 in Chapter 4 – Revisions to the Public Draft IS/MND.

Comment C-5. Comment Noted. We agree that the calculation should be revised to more accurately reflect the incremental impact on annual salt loading to the Main Basin as you suggest and as consistent with the *Zone 7 Water Agency. May 2013. Annual Report for the Groundwater Management Program – 2012 Water Year (Table 4.3-2)*. As such, we agree that the incremental salt loading to the Main Basin shall be calculated by 675 tons of new salt per year divided by the average annual total salt loading in tons per year of 13, 641 that equates to a 5 percent increase. We still hold forth that this incremental increase in not considered to be a significant impact. Please see the minor revisions and further clarification to

Section 3.8 Hydrology and Water Quality on page 3-26 in Chapter 4 – Revisions to the Public Draft IS/MND.

Comment C-6. Comment Noted. The City agrees that the first bulleted action item of this mitigation measure will not prevent the salt from the agronomic rate applications of recycled water from leaching to groundwater, but rather it limits the potential for significant amounts of salt to impact groundwater quality from the overuse of recycled water. However, if applied at the appropriate agronomic rate, it will allow the plants to take up other wastewater constituents such as nitrogen compounds rather than being leached to groundwater. Application of fertilizers should take into account the nutrient levels in the recycled water as well as plant demand.

Comment C-7. Comment Noted. The City agrees that none of the four subsequent bulleted action items provide groundwater quality protection. A more appropriate mitigation measure would include complying with the State’s General Waste Discharge Requirements of Recycled Water Use (Water Quality Order 2014-0090). This General Order has provisions for monitoring and reporting to assure compliance, and a requirement for the development of a salt and nutrient management plan or the participation in another agency’s regional or sub-regional Salt and Nutrient Management Plan (SNMP), which Zone 7 has. The City acknowledges that Zone 7’s SNMP considers the additional salt loading anticipated from Pleasanton’s future recycled water and plans to construct a second groundwater demineralization facility to mitigate the additional salt loading from the increased imported water and recycled water use. The City acknowledges the City’s participation in Zone 7’s SNMP development and fully supports Zone 7’s support for implementing a second demineralization facility to help reduce salt loading to the Main Basin. Please see the minor revisions and further clarification to Section 3.8 Hydrology and Water Quality on page 3-26 in Chapter 4 – Revisions to the Public Draft IS/MND.

Comment C-8. Comment Noted. The City agrees that the discussion in item “a” should include a reference to the SNMP in addition to Mitigation Measure HWQ-4. Please see the minor revisions and further clarification to Section 3.8 Hydrology and Water Quality on page 3-27 in Chapter 4 – Revisions to the Public Draft IS/MND.

Comment C-9. Comment Noted. The City has provided a reference to the in item “a” to include a reference to the SNMP in addition to Mitigation Measure #HWQ-4. Please see the minor revisions and further clarification to Section 3.8 Hydrology and Water Quality (a) on page 3-27 in Chapter 4 – Revisions to the Public Draft IS/MND.

Comment C-10. Comment Noted. Please see the minor revisions and further clarification to Section 3.8 Hydrology and Water Quality (a) on page 3-27 in Chapter 4 – Revisions to the Public Draft IS/MND.

Comment C-11. Comment Noted. Please see the minor revisions and further clarification to Section 3.8 Hydrology and Water Quality (b) on page 3-27 in Chapter 4 – Revisions to the Public Draft IS/MND.

Comment C-12. Comment Noted. The City’s IS/MND does in fact recognize the potential for recycled water use to “provide substantial additional sources of polluted runoff”. In Section 2 – Proposed Project Description and Alternatives, subsections 2.3 and 2.4 provides details as to the measures the City will take to be in compliance with the California Code of Regulation Title 22, the State Board’s Recycled Water Policy, and San Francisco Regional Water Quality Control Board’ requirements including irrigating at agronomic rates and periodic inspections as a means to limit runoff during irrigation, and monitoring and reporting as a means to assure compliance, among other provisions. Please see pages 2-4 through 2-5. Therefore with these measures implemented as part of the project description, the City does not anticipate any additional and substantial sources of polluted runoff. Therefore, we are leaving Section 3.8 Hydrology and Water Quality (e) as it is written in the Public Draft IS/MND.

Comment C-12. Comment Noted. The City acknowledges that the East Pleasanton Specific Plan water analysis refers to the use of recycled water offset as a source of supply. However, the City does not agree with the need to revise the language in the section or page you reference.

Chapter 4 Revisions to the Public Draft IS/MND

This chapter shows revisions to the June 28, 2014 Public Draft IS/MND, subsequent to the document’s publication and public review. The revisions are presented in the order in which they appear in the Public Draft IS/MND and are identified by section and page number in respective chapters. These revisions are shown as excerpts from the Public Draft IS/MND, with strikethrough (~~strikethrough~~) text in indicate deletions and underlined (underlined) text to indicate additions.

2.2 Construction Considerations

On page 2-3, the first bulleted item is hereby revised as follows.

- Any local creek or drainage crossings would be constructed using trenchless techniques and will be done in the dry season and will not occur during inclement weather or between October 15 and April 1. Specifically, the pipeline crossing the Arroyo Mocho will either be hung on the existing road bridge or cross under the creek channel using directional drilling methods.

2.5 Responsible Agencies, Permits and Approvals

On page 2-6, **Table 2: Regulatory Requirements, Permits, and Authorizations for Project/Action Facilities**, is hereby revised as follows.

Table 2 below summarizes the potential permits and/or approvals that may be required prior to construction of the Proposed Project. Additional local approvals and permits may also be required.

Table 2: Regulatory Requirements, Permits, and Authorizations for Project/Action Facilities

Agency	Type of Approval
San Francisco Bay Regional Water Quality Control Board	National Pollutant Discharge Elimination System General Permit for Stormwater Discharge Associated with Construction Activities Recycled Water Use Permit Amendment
California Division of Occupational Safety and Health	Construction activities in compliance with CAL/OSHA safety requirements
<u>California Department of Transportation (Caltrans)</u>	Encroachment Permit
Bay Area Air Quality Management District (BAAQMD)	Authority to Construct
	Permit to Operate

2.6 No Project/Action Alternative

On page 2-6, the language for **Section 2.6 - No Project/Action Alternative**, is hereby revised as follows.

Under the No Project/Action Alternative, the City’s Proposed Project/Action would not be constructed and therefore impacts as a result of this specific Proposed Project/Action as described here within this document would not be encountered. For this analysis, it is assumed that the existing baseline condition and the future No Project/Action condition are the same. This No Project/Action Alternative assumes that none of the Proposed Project/Action facilities would be constructed. As a result, the impact description and summary compares the Proposed Project/Action to the No Project/Action. With that said, if the City does not implement the

Proposed Project/Action, one and/or of two scenarios will likely need to be implemented to meet the City's future water supply demands: 1) meet increased demands through more aggressive conservation measures and/or 2) have Zone 7 procure additional water supplies to meet the City's increased water supply demands. However, at this time, the specific details of these activities are not known and therefore it would be difficult to have a meaningful discussion of their potential environmental impacts in relation to the Proposed Project/Action.

3.3 Air Quality

On pages 3-7 through 3-9, Mitigation Measures AIR-1 and AIR-2 are hereby revised as follows.

Mitigation Measure AIR-1: Basic Construction Mitigation Measures Recommended for ALL Proposed Projects. During all phases of construction, the following procedures shall be implemented:

- All exposed dirt surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Mitigation Measure AIR-2: Additional Construction Mitigation Measures for Projects with Emissions over the Thresholds. During all phases of construction, the following procedures shall be implemented:

- All exposed dirt surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- As practical, wWind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
- As practical, vVegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
- The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site, if necessary.
- Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12 inch compacted layer of wood chips, mulch, or gravel.
- Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than three ~~one~~ percent.
- Minimizing the idling time of diesel powered construction equipment to two minutes.
- The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NOx reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.
- Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).
- Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM.
- Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy-duty diesel engines.

Once operational, emission sources resulting from project operations would be associated with primarily regular maintenance and inspection work. Operational impacts would be considered less-than-significant. With respect to project conformity with the federal Clean Air Act, the

Proposed Project/Action's potential emissions are well below minimum thresholds and are below the area's inventory specified for each criteria pollutant designated non-attainment or maintenance for the Bay Area. As such, further general conformity analysis is not required.

3.4 Biological Resources

On page 3-12, **Mitigation Measure BIO-1: Conduct Alameda whipsnake Pre-construction Surveys** is hereby revised as follows.

BIO-1: Conduct Alameda whipsnake Pre-construction Surveys. Prior to construction, the City shall conduct focused pre-construction surveys for the Alameda whipsnake at all project sites/areas within or directly adjacent to areas identified as having high potential for whipsnake occurrence. Project sites within high potential areas shall be fenced to exclude snakes prior to project implementation. Methods for pre-construction surveys, burrow excavation, and site fencing shall be developed prior to implementation of any project located within or adjacent to areas mapped as having high potential for whipsnake occurrence. Such methods would be developed in consultation or with approval of USFWS for any development taking place in USFWS officially designated Alameda whipsnake critical habitat. Pre-construction surveys of such project sites shall be carried out by a permitted biologist familiar with whipsnake identification and ecology (Swaim, 2002). These are not intended to be protocol-level surveys but designed to clear an area so that individual whipsnakes are not present within a given area prior to initiation of construction. At sites where the project footprint would not be contained entirely within an existing developed area footprint and natural vegetated areas would be disturbed any existing animal burrows shall be carefully hand-excavated to ensure that there are no whipsnakes within the project footprint. Any whipsnakes found during these surveys shall be relocated according to the Alameda Whipsnake Relocation Plan. Snakes of any other species found during these surveys shall also be relocated out of the project area. Once the site is cleared it shall then be fenced in such a way as to exclude snakes for the duration of the construction activities. Fencing shall be maintained intact throughout the duration of the construction activities. All construction activities shall be performed during daylight hours, or with suitable lighting so that snakes can be seen. ~~Vehicle speed on the construction site shall not exceed 5 miles per hour.~~

On page 3-14, **Mitigation Measure BIO-3: Conduct Nesting Surveys** is hereby revised as follows.

Mitigation Measure BIO-3: Conduct Nesting Surveys. For any construction activities initiated between March 15 and September 1, surveys for nesting western burrowing owls and/or raptors are required within 250 feet ~~0.25 miles~~ of areas of disturbance. If an active nest is found, a qualified biologist shall monitor the nest during construction activities within 250 feet ~~0.25 miles~~ of the nest to determine whether project construction may result in abandonment. The biologist shall continue monitoring the nest until construction within 250 feet ~~0.25 miles~~ of the nest is completed, or until all chicks have completely fledged. If the monitor determines that construction may result in abandonment of the nest, all construction activities within 250 feet ~~0.25 miles~~ should be halted until the nest is abandoned or all young have fledged.

3.8 Hydrology and Water Quality

On Pages 3-24 through 3-28, **Hydrology and Water Quality** is hereby revised as follows.

3.8 Hydrology and Water Quality

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
Would the Proposed Project/Action:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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, in a manner that would result in substantial erosion of siltation on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality? (erosion potential)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- j) Inundation of seiche, tsunami, or mudflow?

Discussion

- (a) **Less-than-Significant Impact with Mitigation.** Excavation, grading, and construction activities associated with the Proposed Project/Action could violate water quality as those activities would expose and disturb soils, resulting in potential increases in erosion and siltation in the Project area. Construction during the rainy season could result in increases in erosion, ~~siltation~~ siltation, and water quality issues. Generally, excavation, grading, paving, and other construction activities would expose disturbed and loosened soils to erosion by wind and runoff. Construction activities could therefore result in increased erosion and siltation, including nutrient loading and increasing the total suspended solids concentration. Erosion and siltation from construction have the potential to impact the creeks and drainage crossings, therefore posing a potentially significant impact to water quality. With the incorporation of the following mitigation, any potential impacts to water quality as a result of construction are reduced to less-than-significant levels.

Mitigation Measure HWQ-1: Implement Construction Best Management Practices.

To reduce potentially significant erosion and siltation, the City and/or its selected contractor(s) shall comply with the San Francisco RWQCB Construction General Permit and obtain a Notice of Intent (NOI) prior to the start of work. ~~Stormwater Pollution Prevention Permit (SWPPP) and implement Best Management Practices and erosion control measures as required by the San Francisco RWQCB.~~ Best Management Practices to reduce erosion and siltation shall include the following measures: Avoidance of construction activities during inclement weather; limitation of construction access routes and stabilization of access points; stabilization of cleared, excavated areas by providing vegetative buffer strips, providing plastic coverings, and applying ground base on areas to be paved; protection of adjacent properties by installing sediment barriers or filters, or vegetative buffer strips; stabilization and prevention of sediments from surface runoff from discharging into storm drain outlets; use of sediment controls and filtration to remove sediment from water generated by dewatering; and returning all drainage patterns to pre-existing conditions.

Mitigation Measure HWQ-2: Avoid cutting through the creeks. As described in the Proposed Project/Action description, all creek crossings will be crossed by installing the pipelines on the ~~side of the~~ bridge and above the channel. Construction crews shall avoid entering the stream channels during installation. With these mitigation measures in place, the Proposed Project/Action is unlikely to have a direct and/or indirect adverse effect on this species or its supporting habitat. Once constructed, the operation and maintenance of the Proposed Project/Action will not adversely affect this species.

Mitigation Measure HWQ-3: Implement Best Management Practices. To reduce potentially significant erosion and siltation, the City and/or its selected contractor(s) shall comply with the San Francisco RWQCB Construction General Permit and obtain a Notice of Intent (NOI) prior to the start of work. ~~Stormwater Pollution Prevention Permit (SWPPP) and implement Best Management Practices and erosion control measures as required by the San Francisco RWQCB.~~ Best Management Practices to reduce erosion and siltation shall include, at a minimum, the following measures: Avoidance of construction activities during inclement weather; limitation of construction access routes and stabilization of access points; stabilization of cleared, excavated areas by providing

vegetative buffer strips, providing plastic coverings, and applying ground base on areas to be paved; protection of adjacent properties by installing sediment barriers or filters, or vegetative buffer strips; stabilization and prevention of sediments from surface runoff from discharging into storm drain outlets; use of sediment controls and filtration to remove sediment from water generated by dewatering; and returning all drainages to preconstruction conditions. Construction crews shall avoid entering the stream channels during installation.

In addition, the operation of the Proposed Project/Action and application of recycled water will increase salts and nutrient loadings on the soils that could result in significant impacts to adjacent surface and groundwater resources. Rising levels of salts have been observed in the Livermore Valley Groundwater Basin (Main Basin) over the past several decades and are generally measured as Total Dissolved Solids (TDS). The main sources of salt loading to the 250,000 acre-foot capacity Main Basin are landscape irrigation with potable and recycled water, recharge operations using surface water from the State Water Project (SWP), and runoff from the local arroyos. Salts may also be naturally leached from the marine sediments in the northwestern area of the Valley. The City's existing potable water supply includes both groundwater and surface water resources totaling approximately 16,500 afy and which currently has a combined average TDS level of approximately 375 milligrams per liter (mg/l)¹. At build out, the Proposed Project/Action would offset approximately 2,500 afy of that supply with recycled water for irrigation purposes. The proposed new recycled water supply would have an average TDS level of approximately 597 mg/l² which would result in an approximately 60 percent increase in salt loading for the 2,500 afy of water to be used for irrigation purposes. It is assumed that with proper irrigation best management practices, recycled water operations would have an 80 percent irrigation efficiency, meaning that 80 percent of the applied recycled water would be lost through evapotranspiration and the remaining 20 percent of the flow would percolate through the root zone. All of the applied salts are assumed to remain with the 20 percent flow and would percolate into the groundwater as a result of winter rains. The increased salt loading would result in approximately 675 tons per year. However, in context to the overall Main Basin that has a capacity of 250,000 acre-feet and an average salt loading of 13,641 tons per year³, this incremental increase is not considered to be a significant impact (i.e. ~~0.27~~ 5 percent). Also, recycled water has higher amounts of nitrogen, phosphorus, and potassium than potable supplies. Thus, recycled water would help alleviate the need to use fertilizers that are more readily applied if potable supplies are used for irrigation and which are not accounted for in its TDS calculations. Further, with the implementation of the following recycled water best management practices, any of these impacts can be further reduced and remain to be less-than-significant.

Mitigation Measure HWQ-4: Implement Recycled Water Best Management Practices. In order to help reduce the potential effects of increased salt loading potential as a result of using recycled water, the City shall:

- Apply water consistent with Title 22 requirements and in amounts (frequency and intensity) which meet the demands of the plant (agronomic rates), but not in excessive amounts such that salts buildup in the soil beyond the root zone and/or otherwise are leached to groundwater;
- Ensure that adequate soil drainage is maintained;

¹ City of Pleasanton. *Administrative Draft Feasibility Study, Recycled Water Project*. June 2012.

² Dublin San Ramon Services District/East Bay Municipal Utilities District (DERWA). *San Ramon Valley Recycled Water Program, Recycled Water Quality Annual Report*. June 2008.

³ Zone 7 Water Agency. May 2013. *Annual Report for the Groundwater Management Program – 2012 Water Year (Table 4.3-2)*.

- Ensure that salt-sensitive plants (e.g. Colonial bentgrass) are not to be spray wet;
- Replace salt-sensitive plants with salt-tolerant plants (e.g. Bermudagrass), and
- Addressing sodium and alkalinity concerns through addition of water and soil amendments, including addition of gypsum.
- Comply with the State Board's General Waste Discharge Requirements of Recycled Water Use (Water Quality Order 2014-0090).

With the implementation of **Mitigation Measures HWQ-1, HWQ-2, HWQ-3 and HWQ-4**, any water quality impacts as a result of the use of recycled water will be reduced to less-than-significant levels. In addition, in 2005, Zone 7 has prepared a Salt and Nutrient Management Plan (SNMP) that considers the additional salt loading from the City's future recycled water project (i.e. this Proposed Project/Action) and plans to construct a second groundwater demineralization facility to mitigate the additional salt loading from the increased imported water and recycled water use. This plan is in the process of being updated and the City is participating in its development and fully supports its implementation, including the construction of a second demineralization facility. As a result, no additional mitigation measures ~~or demineralization facilities~~ would be required.

- (b) **No Impact.** Construction and/or operation of the Proposed Project/Action would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Construction of the Proposed Project/Action would be done primarily within existing roadways and subsurface excavation would be limited to 3-6 feet below surface elevation and would not interfere with groundwater supplies. Once constructed, the pipeline will also not adversely affect groundwater supplies. In fact, the ~~application importation~~ of approximately to 2,500 acre-feet of recycled water per year has the potential to offset current groundwater pumping which has the potential to increase local groundwater supplies through an in-lieu recharge basis. Therefore, no adverse impacts are anticipated and no mitigation is required.
- (c) **Less-than-Significant Impact with Mitigation.** Construction and/or operation of the Proposed Project/Action would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site. As described in the Project Description, the Proposed Project/Action would be located primarily within existing roadways. With the implementation of **Mitigation Measure HWQ-1**, above, the Proposed Project/Action would not significantly alter any existing drainage areas.
- (d) **Less-than-Significant Impact with Mitigation.** Construction and/or operation of the Proposed Project/Action would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in flooding on- or off-site. As described in the Project Description, the Proposed Project/Action would be located within existing roadways. With the implementation of **Mitigation Measure HWQ-1, HWQ-2, and HWQ-3, and HWQ-4**, above, the Proposed Project/Action would not significantly alter any existing drainage areas.
- (e) **No Impact.** The Proposed Project/Action would not result in any new significant impervious surfaces and would not create new areas of low permeability. The Proposed Project/Action would be located primarily within existing roadways. The Proposed Project/Action would be returned to pre-construction conditions and would not increase the impervious surfaces and therefore would not create new areas of low permeability. In addition, the construction of the filtration upgrades would not create a new impervious layer that would significantly affect

permeability. As a result, no additional runoff is expected to be generated by the Proposed Project/Action. Therefore, the Proposed Project/Action would not result in exceeding the capacity of existing or planned storm water drainage systems. No impacts would occur and no mitigation is necessary.

- (f) **Less-than-Significant Impact with Mitigation.** The Proposed Project/Action would not substantially affect water quality. As discussed earlier, the construction of the Proposed Project/Action could result in minor, temporary, and highly localized soil erosion and siltation issues. However, with the incorporation of **Mitigation Measure HWQ-1, HWQ-2, and HWQ-3, and HWQ-4** above, potential impacts to water quality would be reduced to less-than-significant levels.
- (g) **No Impact.** The Proposed Project/Action would not redirect flood flows or otherwise place housing within a 100-year flood hazard area. No impact is expected and no mitigation is required or necessary.
- (h) **No Impact.** The Proposed Project/Action would generally not place exposed structures within a 100-year flood hazard area. The pipeline facilities would be primarily located underground and the filtration upgrades would be located at the existing DSRSD WWTP and out of the 100-year flood hazard area. No impact is expected and no mitigation is required or necessary.
- (i) **No Impact.** The Proposed Project/Action would not expose people or structures to a significant risk of loss, injury, or death involving flooding; including flooding as a result of a failure of a levee or dam. No impact is expected and no mitigation is required or necessary.
- (j) **No Impact.** The Proposed Project/Action would not expose people or structures to a significant risk of loss, injury, or death involving a seiche or tsunami. In addition, the Proposed Project/Action area is essentially level, with minimal to no potential hazards from mudflows. No impact is expected and no mitigation is required or necessary.

Chapter 5 CEQA Findings and Determination:

On the basis of this Final IS/MND for the City of Pleasanton's Recycled Water Project:

- I find that the Proposed Project WOULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the Proposed Project COULD have a significant effect on the environment, there will NOT be a significant effect in this case because revisions in the Project and/or mitigation measures have been made by or agreed to by the City. As a result, a MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the Proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

Signature

Date

Daniel Smith
Printed Name

Director of Operation Services
Title

Appendix A

Mitigation Monitoring and Reporting Program

MITIGATION MONITORING AND REPORTING PROGRAM

**City of Pleasanton
Recycled Water Project
Final Initial Study / Mitigated Negative Declaration**

SCH #2014062084

Prepared for:

City of Pleasanton
Operations Center Counter
3333 Busch Road
Pleasanton, CA 94566

Prepared by:



SMB Environmental, Inc.

August 2014

INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA; Public Resources Code Section 21000, et seq. and CEQA Guidelines), the City of Pleasanton, California (City) prepared a Public Draft Initial Study/Mitigated Negative Declaration (IS/MND) to evaluate potential environmental impacts associated with the City's proposed Recycled Water Project (Proposed Project/Action). The purpose of the Proposed Project/Action is to construct and operate a new recycled water system to replace/augment existing irrigation supplies in the City's service area. The development of recycled water service within the City will lessen the demand for Zone 7 Water Agency (Zone 7) potable water supplies and help the City meet the State of California's Water Conservation Act of 2009, which requires a 20 percent reduction in urban per capita water use by the year 2020. Furthermore, the addition of recycled water to the City's water supply portfolio will increase its water system's reliability since recycled water is a local supply within the City's control and is drought-resistant.

CEQA Guidelines require public agencies to adopt a Mitigation Monitoring and Reporting Program (MMRP) for changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. A MMRP is required for the proposed project because the IS/MND identifies potentially significant adverse impacts related to project implementation, and mitigation measures have been identified to reduce those impacts.

On June 26, 2014, to initiate public review of the Draft IS/MND, the City filed a Notice of Completion (NOC) for the project with the Governor's Office of Planning and Research (State Clearinghouse or SCH) and the County of Alameda and released the Draft IS/MND for a 30-day public review. The State Clearinghouse identified the project with SCH #2014062084. The 30-day public review period was established between June 28 and July 28, 2014, with copies of the Draft IS/MND available for review on the City's website at <http://www.cityofpleasanton.gov>, the City of Pleasanton Library 400 Old Bernal Avenue, Pleasanton, CA 94566, and at the City of Pleasanton, Operation Center Counter, 3333 Busch Road, Pleasanton, CA 94566.

In August 2014, the City prepared a Final IS/MND according to CEQA Guidelines and incorporates all comments received by the State Clearinghouse and the City during the 30-day public review period. As a result, some of the mitigation measures identified in the Public Draft IS/MND have been revised to reflect those comments. Based on the Final IS/MND, the Proposed Project/Action would not result in new significant impacts, substantially increase the severity of previously disclosed impacts, or involve any of the other conditions related to changed circumstances or new information that can require a subsequent or supplemental EIR under Public Resources Code section 21166 and CEQA Guidelines section 15162 beyond those impacts and conditions already identified in the City's Public Draft IS/MND.

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to ensure that all required mitigation measures are implemented and completed in a satisfactory manner before and during project construction and operation. The MMRP may be modified by the City during project implementation, as necessary, in response to changing conditions or other refinements. Table A (included at the end of this document) has been prepared to assist the responsible parties in implementing the mitigation measures. The table identifies individual mitigation measures, monitoring/mitigation timing, responsible person/agency for implementing the measure, monitoring and reporting procedure, and space to confirm implementation of the mitigation measures. The numbering of mitigation measures follows the numbering sequence found in the Public Draft IS/MND.

ROLES AND RESPONSIBILITIES

Unless otherwise specified herein, the City is responsible for taking all actions necessary to implement the mitigation measures under its jurisdiction according to the specifications provided for each measure and for demonstrating that the action has been successfully completed. The City, at its discretion, may delegate implementation responsibility or portions thereof to a licensed contractor or other designated agent. The City would be responsible for overall administration of the MMRP and for verifying that

City staff members and/or the construction contractor has completed the necessary actions for each measure.

The City would designate a project manager to oversee implementation of the MMRP. The City of Pleasanton's Operations Services Department is primarily responsible for implementing the mitigation measures for the Proposed Project as described in this MMRP. Duties of the project manager include the following:

- Ensure that routine inspections of the construction site are conducted by appropriate City staff; check plans, reports, and other documents required by the MMRP; and conduct report activities.
- Serve as a liaison between the City and the contractor or project applicant regarding mitigation monitoring issues.
- Complete forms and maintain reports and other records and documents generated by the MMRP.
- Coordinate and ensure that corrective actions or enforcement measures are taken, if necessary.

The responsible party for implementation of each item would identify the staff members responsible for coordinating with the City on the MMRP.

REPORTING

The City's project manager shall prepare a monitoring report, upon completion of the project, on the compliance of the activity with the required mitigation measures. Information regarding inspections and other requirements shall be compiled and explained in the report. The report shall be designed to simply and clearly identify whether mitigation measures have been adequately implemented. At a minimum, each report shall identify the mitigation measures or conditions to be monitored for implementation, whether compliance with the mitigation measures or conditions has occurred, the procedures used to assess compliance, and whether further action is required. The report shall be presented to the City Council.

MITIGATION MONITORING AND REPORTING PLAN TABLE

The categories identified in Table A are described below.

- **Mitigation Measure** – This column provides the text of the mitigation measures identified in the IS/MND.
- **Timing** – This column identifies the time frame in which the mitigation will take place.
- **Enforcement** – This column identifies the party responsible for enforcing compliance with the requirements of the mitigation measure.
- **Dated Signature for Verification of Compliance** – This column is to be dated and signed by the person (either project manager or his/her designee) responsible for verifying compliance with the requirements of the mitigation measure.

**Table A
Mitigation Monitoring and Reporting Plan for the City of Pleasanton's Recycled Water Project IS/MND**

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
3.3 AIR QUALITY				
<p>Mitigation Measure AIR-1: Basic Construction Mitigation Measures Recommended for ALL Proposed Projects. During all phases of construction, the following procedures shall be implemented:</p> <ul style="list-style-type: none"> • All exposed dirt surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator. • Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. 	<p>Prior to construction of The Proposed Project/Action.</p>	<p>City of Pleasanton</p>	<p>City of Pleasanton Bay Area Air Quality Management District</p>	

¹ The City of Pleasanton's Operations Services Department is primarily responsible for implementing the mitigation measures for the Proposed Project/Action as described in this MMRP.

**Table A
Mitigation Monitoring and Reporting Plan for the City of Pleasanton's Recycled Water Project IS/MND**

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
<p>Mitigation Measure AIR-2: Additional Construction Mitigation Measures for Projects with Emissions over the Thresholds. During all phases of construction, the following procedures shall be implemented:</p> <ul style="list-style-type: none"> • All exposed dirt surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe. • All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. • As practical, wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity. • As practical, vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. • The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. • All trucks and equipment, including their tires, shall be washed off prior to leaving the site, if necessary. • Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12 inch compacted layer of wood chips, mulch, or gravel. • Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than three percent. • Minimizing the idling time of diesel powered construction equipment to two minutes. • The project shall require off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 	<p>Prior to construction of The Proposed Project/Action.</p>	<p>City of Pleasanton</p>	<p>City of Pleasanton Bay Area Air Quality Management District</p>	

**Table A
Mitigation Monitoring and Reporting Plan for the City of Pleasanton's Recycled Water Project IS/MND**

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
<p>20 percent NOx reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.</p> <ul style="list-style-type: none"> • Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings). • Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM. • Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy-duty diesel engines. 				
3.4 BIOLOGICAL RESOURCES				
<p>BIO-1: Conduct Alameda whipsnake Pre-construction Surveys. Prior to construction, the City shall conduct focused pre-construction surveys for the Alameda whipsnake at all project sites/areas within or directly adjacent to areas identified as having high potential for whipsnake occurrence. Project sites within high potential areas shall be fenced to exclude snakes prior to project implementation. Methods for pre-construction surveys, burrow excavation, and site fencing shall be developed prior to implementation of any project located within or adjacent to areas mapped as having high potential for whipsnake occurrence. Such methods would be developed in consultation or with approval of USFWS for any development taking place in USFWS officially designated Alameda whipsnake critical habitat. Pre-construction surveys of such project sites shall be carried out by a permitted biologist familiar with whipsnake identification and ecology (Swaim, 2002). These are not intended to be protocol-level surveys but designed to clear an area so that individual whipsnakes are not present within a given area prior to initiation of construction. At sites where the project footprint would not be contained entirely within an existing developed area footprint and natural vegetated areas would be disturbed any existing animal burrows shall be carefully hand-excavated to ensure that there are no whipsnakes within the project footprint. Any whipsnakes found during these surveys shall be relocated according to the Alameda Whipsnake Relocation Plan. Snakes of any other species found during these surveys shall also be relocated out of the project area. Once the site is cleared it shall then be fenced in such a way as to exclude</p>	<p>Prior to and during construction of the Proposed Project/Action.</p>	<p>City of Pleasanton</p>	<p>City of Pleasanton California Department of Fish and Wildlife U.S. Fish and Wildlife Service</p>	

**Table A
Mitigation Monitoring and Reporting Plan for the City of Pleasanton's Recycled Water Project IS/MND**

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
<p>snakes for the duration of the construction activities. Fencing shall be maintained intact throughout the duration of the construction activities. All construction activities shall be performed during daylight hours, or with suitable lighting so that snakes can be seen.</p>				
<p>Mitigation Measure BIO-2: Conduct Breeding Surveys. For construction activities that occur between February 1 and August 31, preconstruction breeding bird surveys shall be conducted by a qualified biologist prior to and within 10 days of any initial ground-disturbance activities. Surveys shall be conducted within all suitable nesting habitat within 250 feet of the activity. All active, non-status passerine nests identified at that time should be protected by a 50-foot radius minimum exclusion zone. Active raptor or special-status species nests should be protected by a buffer with a minimum radius of 200 feet. CDFW and USFWS recommend that a minimum 500-foot exclusion buffer be established around active white-tailed kite and golden eagle nests. The following considerations apply to this mitigation measure:</p> <ul style="list-style-type: none"> • Survey results are valid for 14 days from the survey date. Should ground disturbance commence later than 14 days from the survey date, surveys should be repeated. If no breeding birds are encountered, then work may proceed as planned. • Exclusion zone sizes may vary, depending on habitat characteristics and species, and are generally larger for raptors and colonial nesting birds. Each exclusion zone would remain in place until the nest is abandoned or all young have fledged. • The non-breeding season is defined as September 1 to January 31. During this period, breeding is not occurring and surveys are not required. However, if nesting birds are encountered during work activities in the non-breeding season, disturbance activities within a minimum of 50 feet of the nest should be postponed until the nest is abandoned or young birds have fledged. 	<p>Prior to and during construction of the Proposed Project/Action.</p>	<p>City of Pleasanton</p>	<p>City of Pleasanton California Department of Fish and Wildlife U.S. Fish and Wildlife Service</p>	
<p>Mitigation Measure BIO-3: Conduct Nesting Surveys. For any construction activities initiated between March 15 and September 1, surveys for nesting western burrowing owls and/or raptors are required within 250 feet of areas of disturbance. If an active nest is found, a qualified biologist shall monitor the nest during construction activities within 250 feet of the nest to determine whether project construction may result in abandonment. The biologist shall continue monitoring the nest until construction within 250 feet of the nest is completed, or</p>	<p>Prior to and during construction of the Proposed Project/Action.</p>	<p>City of Pleasanton</p>	<p>City of Pleasanton</p>	

**Table A
Mitigation Monitoring and Reporting Plan for the City of Pleasanton's Recycled Water Project IS/MND**

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
until all chicks have completely fledged. If the monitor determines that construction may result in abandonment of the nest, all construction activities within 250 feet should be halted until the nest is abandoned or all young have fledged.				
3.5 CULTURAL RESOURCES				
<p>Mitigation Measure CR-1: Halt work if cultural resources are discovered. In the event that any prehistoric or historic subsurface cultural resources are discovered during ground disturbing activities, all work within 100 feet of the resources shall be halted and after notification, the City shall consult with a qualified archaeologist to assess the significance of the find. If any find is determined to be significant (CEQA Guidelines 15064.5[a][3] or as unique archaeological resources per Section 21083.2 of the California Public Resources Code), representatives of the City and a qualified archaeologist shall meet to determine the appropriate course of action. In considering any suggested mitigation proposed by the consulting archaeologist in order to mitigate impacts to historical resources or unique archaeological resources, the lead agency shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is carried out.</p>	Upon discovery of cultural resources	City of Pleasanton	City of Pleasanton	
<p>Mitigation Measure CR-2: Stop work if paleontological remains are discovered. If paleontological resources, such as fossilized bone, teeth, shell, tracks, trails, casts, molds, or impressions are discovered during ground-disturbing activities, work will stop in that area and within 100 feet of the find until a qualified paleontologist can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the City.</p>	Before and during ground-disturbing activities.	City of Pleasanton	City of Pleasanton	
<p>Mitigation Measure CR-3: Halt work if human remains are found. If human remains are encountered during excavation activities conducted for the Proposed Project/Action, all work in the adjacent area shall stop immediately and the Alameda County Coroner's office shall be notified. If the Coroner determines that the remains are Native American in origin, the Native American Heritage Commission shall be notified and will identify the Most Likely Descendent, who will be consulted for recommendations for treatment of the discovered human remains and any associated burial goods.</p>	Upon the discovery of suspected human remains.	City of Pleasanton	City of Pleasanton For actions taken to satisfy the requirements of Section 106: the State Historic Preservation Office (SHPO)	
3.6 GEOLOGY AND SOILS				

**Table A
Mitigation Monitoring and Reporting Plan for the City of Pleasanton's Recycled Water Project IS/MND**

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
<p>Mitigation Measure GEO-1: Perform Geotechnical Investigation. The City shall require a design-level geotechnical study to be prepared prior to project implementation to determine proper design and construction methods, including any cathodic protection measures needed for installing the pipelines in these soils.</p>	<p>Prior to completion of engineering plans for the Proposed Project/Action.</p>	<p>City of Pleasanton</p>	<p>City of Pleasanton</p>	
<p>3.8 HAZARDS AND HAZARDOUS MATERIALS</p>				
<p>Mitigation Measure HAZ-1: Store, Handle, Use Hazardous Materials in Accordance with Applicable Laws. The City shall ensure that all construction-related hazardous materials and hazardous wastes shall be stored, handled, and used in a manner consistent with relevant and applicable federal, state, and local laws and done in a manner that protects surface waters and groundwater. In addition, construction-related hazardous materials and hazardous wastes shall be staged and stored away from stream channels and steep banks to keep these materials a safe distance from near-by residents and prevent them from entering surface waters in the event of an accidental release. Additionally, the City shall develop a spill contingency plan that addresses measures to address spills and leaks of hazardous materials as well as appropriate use of adequate storage containers for containment.</p>	<p>Prior to construction and operation the Proposed Project/Action</p>	<p>City of Pleasanton</p>	<p>City of Pleasanton</p>	
<p>Mitigation Measure HAZ-2: Properly Dispose of Contaminated Soil and/or Groundwater. If contaminated soil and/or groundwater is encountered or if suspected contaminated is encountered during project construction, work shall be halted in the area, and the type and extent of the contamination shall be identified. A contingency plan to dispose of any contaminated soil or groundwater will be developed through consultation with appropriate regulatory agencies.</p>	<p>Prior to construction and operation the Proposed Project/Action</p>	<p>City of Pleasanton</p>	<p>City of Pleasanton</p>	
<p>Mitigation Measure HAZ-3: Properly Dispose of Hydrostatic Test Water. Dewatering and of the pipeline during hydrostatic testing in the construction phase as well as any dewatering needed as a result of operations and maintenance activities shall be discharged to land and not into any creeks, drainages, or waterways and shall require prior approval from the San Francisco Bay Regional Water Quality Control Board.</p>	<p>Prior to construction and operation the Proposed Project/Action</p>	<p>City of Pleasanton</p>	<p>City of Pleasanton</p>	
<p>Mitigation Measure HAZ-4: Develop and Maintain Emergency Access Strategies. In conjunction with Mitigation Measure Traffic-1: Develop a Traffic Control Plan identified below in the Traffic and Transportation section, comprehensive strategies for maintaining emergency access shall be developed. Strategies shall include, but not limited to, maintaining steel trench plates at the construction sites to restore access across open trenches and identification of</p>	<p>Prior to construction and operation the Proposed Project/Action.</p>	<p>City of Pleasanton</p>	<p>City of Pleasanton</p>	

**Table A
Mitigation Monitoring and Reporting Plan for the City of Pleasanton's Recycled Water Project IS/MND**

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
alternate routing around construction zones. Also, police, fire, and other emergency service providers shall be notified of the timing, location, and duration of the construction activities and the location of detours and lane closures.				
3.9 HYDROLOGY AND WATER QUALITY				
Mitigation Measure HWQ-1: Implement Construction Best Management Practices. To reduce potentially significant erosion and siltation, the City and/or its selected contractor(s) shall comply with the San Francisco RWQCB Construction General Permit and obtain a Notice of Intent (NOI) prior to the start of work. Best Management Practices to reduce erosion and siltation shall include the following measures: Avoidance of construction activities during inclement weather; limitation of construction access routes and stabilization of access points; stabilization of cleared, excavated areas by providing vegetative buffer strips, providing plastic coverings, and applying ground base on areas to be paved; protection of adjacent properties by installing sediment barriers or filters, or vegetative buffer strips; stabilization and prevention of sediments from surface runoff from discharging into storm drain outlets; use of sediment controls and filtration to remove sediment from water generated by dewatering; and returning all drainage patterns to pre-existing conditions.	Develop SWPPP prior to and throughout construction.	City of Pleasanton	City of Pleasanton San Francisco Bay Regional Water Quality Control Board	
Mitigation Measure HWQ-2: Avoid cutting through the creeks. As described in the Proposed Project/Action description, all creek crossings will be crossed by installing the pipelines on the bridge and above the channel. Construction crews shall avoid entering the stream channels during installation. With these mitigation measures in place, the Proposed Project/Action is unlikely to have a direct and/or indirect adverse effect on this species or its supporting habitat. Once constructed, the operation and maintenance of the Proposed Project/Action will not adversely affect this species.	Incorporation measures into SWPPP prior to construction and implementation throughout construction, as appropriate	City of Pleasanton	City of Pleasanton San Francisco Bay Regional Water Quality Control Board	
Mitigation Measure HWQ-3: Implement Best Management Practices. To reduce potentially significant erosion and siltation, the City and/or its selected contractor(s) shall comply with the San Francisco RWQCB Construction General Permit and obtain a Notice of Intent (NOI) prior to the start of work. Best Management Practices to reduce erosion and siltation shall include, at a minimum, the following measures: Avoidance of construction activities during inclement weather; limitation of construction access routes and stabilization of access points; stabilization of cleared, excavated areas by providing vegetative buffer strips, providing plastic coverings, and applying ground base on areas to	Prior to construction and operation the Proposed Project/Action.	City of Pleasanton	City of Pleasanton San Francisco Bay Regional Water Quality Control Board	

**Table A
Mitigation Monitoring and Reporting Plan for the City of Pleasanton's Recycled Water Project IS/MND**

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
<p>be paved; protection of adjacent properties by installing sediment barriers or filters, or vegetative buffer strips; stabilization and prevention of sediments from surface runoff from discharging into storm drain outlets; use of sediment controls and filtration to remove sediment from water generated by dewatering; and returning all drainages to preconstruction conditions. Construction crews shall avoid entering the stream channels during installation.</p>				
<p>Mitigation Measure HWQ-4: Implement Recycled Water Best Management Practices. In order to help reduce the potential effects of increased salt loading potential as a result of using recycled water, the City shall:</p> <ul style="list-style-type: none"> • Apply water consistent with Title 22 requirements and in amounts (frequency and intensity) which meet the demands of the plant (agronomic rates), but not in excessive amounts such that salts buildup in the soil beyond the root zone and/or otherwise are leached to groundwater; • Ensure that adequate soil drainage is maintained; • Ensure that salt-sensitive plants (e.g. Colonial bentgrass) are not to be spray wet; • Replace salt-sensitive plants with salt-tolerant plants (e.g. Bermudagrass); • Address sodium and alkalinity concerns through addition of water and soil amendments, including addition of gypsum, and • Comply with the State Board's General Waste Discharge Requirements of Recycled Water Use (Water Quality Order 2014-0090). 	<p>Prior to construction and operation the Proposed Project/Action.</p>	<p>City of Pleasanton</p>	<p>City of Pleasanton</p>	
3.12 NOISE				
<p>Mitigation Measure NOI-1: Limit Construction Hours. Construction activities will be limited to the least noise-sensitive times and will comply with the City's noise ordinances. Construction, alteration, repair or land development activities shall be allowed on weekdays between the hours of 8 a.m. and 8 p.m., on Saturdays between the hours of 10 a.m. and 6 p.m. Construction activities shall not exceed the outdoor ambient sound level (dBA) of 86 dBA.</p>	<p>Prior to and during construction of the Proposed Project/Action.</p>	<p>City of Pleasanton</p>	<p>City of Pleasanton</p>	

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Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
Mitigation Measure NOI-2: Locate Staging Areas away from Sensitive Receptors. The City's construction specification shall require that the contractor select staging areas as far as feasibly possible from sensitive receptors.	Prior to and during construction of the Proposed Project/Action.	City of Pleasanton	City of Pleasanton	
Mitigation Measure NOI-3: Maintain Mufflers on Equipment. The City's construction specifications shall require the contractor to maintain all construction equipment with manufacturer's specified noise-muffling devices.	Prior to and during construction of the Proposed Project/Action.	City of Pleasanton	City of Pleasanton	
Mitigation Measure NOI-4: Idling Prohibition and Enforcement. The City shall prohibit and enforce unnecessary idling of internal combustion engines. In practice, this would mean turning off equipment if it will not be used for five or more minutes.	Prior to and during construction of the Proposed Project/Action.	City of Pleasanton	City of Pleasanton	
Mitigation Measure NOI-5: Equipment Location and Shielding. Locate all stationary noise-generating construction equipment such as air compressors as far as possible from homes and businesses.	Prior to and during construction of the Proposed Project/Action.	City of Pleasanton	City of Pleasanton	
3.17 TRAFFIC AND TRANSPORTATION				
Mitigation Measure TRA-1: Prepare and Implement Traffic Control Plan. As is consistent with existing policy, the City shall require the contractor to prepare and implement effective traffic control plans in the areas of City and County streets to show specific methods for maintaining traffic flows. Examples of traffic control measures to be considered include: 1) use of flaggers to maintain alternating one-way traffic while working on one-half of the street; 2) use of advance construction signs and other public notices to alert drivers of activity in the area; 3) use of "positive guidance" detour signing on alternate access streets to minimize inconvenience to the driving public; 4) provisions for emergency access and passage; and 5) designated areas for construction worker parking.	Prior to and during construction of the Proposed Project/Action.	City of Pleasanton	City of Pleasanton	
Mitigation Measure TRA-2: Return Roads to Pre-construction Condition. Following construction, the City shall ensure that road surfaces that are damaged during construction are returned to their pre-construction condition or better.	Prior to and during construction of the Proposed Project/Action.	City of Pleasanton	City of Pleasanton	