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ADMINISTRATIVE DRAFT
Addendum to the Santa Nella Community Specific Plan Final Recirculated Program EIR for Santa Nella County Water District Water Master Plan and Sewer Master Plan

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Date: January 4, 2019

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SECTION 1: INTRODUCTION

This Addendum, checklist, and attached supporting technical reports and other documents have been prepared to determine whether and to what extent the Santa Nella Community Specific Plan (SNCSP) Final Recirculated Program Environmental Impact Report (EIR) ("SNCSP Final EIR"; State Clearinghouse No. 2004012097), remains sufficient to address the potential impacts of the proposed Water Master Plan (WMP) and proposed Sewer Master Plan (SMP) ("proposed project" or "Master Plans") proposed to be adopted by the Santa Nella County Water District (District), or whether additional documentation is required under the California Environmental Quality Act (CEQA) (Public Resources Code [PRC], § 21000, *et seq*.) and the CEQA Guidelines (Title 14, California Code of Regulations [CCR] § 15000, et seq.).

1.1 - Initial Study/Environmental Checklist

Pursuant to Public Resources Code Section 21166, and CEQA Guidelines Sections 15162 and 15164, subd. (a), this Addendum, checklist, and attached supporting documentation have been prepared to evaluate the proposed project and compare it to the SNCSP Final EIR findings to determine whether any additional environmental review under CEQA is triggered. This Addendum, checklist, and attached supporting documentation use the standard environmental checklist categories provided in Appendix G of the CEQA Guidelines, but provides answer columns for evaluation consistent with the considerations listed under CEQA Guidelines Section 15162, subd. (a).

1.2 - Environmental Analysis and Conclusions

CEQA Guidelines Section 15164, subd. (a) provides that the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR or Negative Declaration (ND) if some changes or additions are necessary but none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent or supplemental EIR or ND have occurred (CEQA Guidelines, § 15164, subd. (a)).

An addendum need not be circulated for public review but can be included in or attached to a final EIR or ND (CEQA Guidelines § 15164, subd. (c)). The decision-making body shall consider the addendum with the final EIR prior to making a decision on the project (CEQA Guidelines § 15164, subd. (d)). An agency must also include a brief explanation of the decision not to prepare a subsequent or supplemental EIR or ND pursuant to Section 15162 (CEQA Guidelines § 15164, subd. (e)).

Consequently, once a final EIR or ND has been certified for a project, no subsequent or supplemental EIR or ND is required under CEQA unless, based on substantial evidence:

1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or ND . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; [1]

[1] CEQA Guidelines Section 15382 defines "significant effect on the environment" as " . . . a substantial, or potentially substantial

2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or ND . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the ND was adopted. . . shows any of the following:
   a. The project will have one or more significant effects not discussed in the previous EIR or ND;
   b. Significant effects previously examined will be substantially more severe than shown in the previous EIR or ND;
   c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
   d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or ND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative (CEQA Guidelines, § 15162, subd. (a); see also PRC § 21166).

This Addendum analyzes the proposed project in the context of the SNCSP Final EIR as required by CEQA. This Addendum, checklist, and attached supporting documentation constitutes substantial evidence supporting the conclusion that preparation of a supplemental or subsequent EIR is not required prior to approval of the proposed project and related approvals by the District, and provides the required documentation under CEQA.

This Addendum addresses the conclusions of the SNCSP Final EIR utilizing the criteria set forth in CEQA Guidelines Section 15162(a).

1.2.1 - Findings

The impacts of the proposed project remain consistent with the impacts previously analyzed in the SNCSP Final EIR, and would not result in any new significant impacts or an increase in the severity in previously identified significant impacts (CEQA Guidelines § 15164).

1.2.2 - Conclusions

The District may approve the proposed project based on this Addendum. The impacts of the proposed project remain within the impacts previously analyzed in the SNCSP Final EIR (CEQA Guidelines § 15164) and none of the conditions set forth in CEQA Guidelines Section 15162(a) has occurred.

adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance . . .” (see also Public Resources Code, Section 21068).

1.3 - Mitigation Monitoring Program

As required by Public Resources Code Section 21081.6, subd. (a)(1), a Mitigation, Monitoring and Reporting Program (MMRP) was prepared for the SNCSP Final EIR in order to monitor the implementation of the mitigation measures that were adopted for that project. Any long-term monitoring of mitigation measures imposed on the proposed project will be implemented by the District, as needed. Mitigation measures from the SNCSP EIR that remain applicable are listed throughout this document, and will be compiled into a new MMRP for use by the District.

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SECTION 2: PROJECT DESCRIPTION

This section provides a description of the proposed project, including details of the location, setting, background, and principal project characteristics.

In general, the proposed project is designed to ensure that adequate capacity exists to meet the water and wastewater demand associated with build out of the SNCSP. The SNCSP, as approved in 2004, envisioned the development of up to 6,483 dwelling units and over 5.5 million square feet of commercial and industrial uses across a 2,560-acre planning area. The SNCSP Final EIR included a proposed network for the sewer system and a proposed treatment and disposal plan for wastewater. The SNCSP Final EIR also reiterated the 2000 Community Specific Plan (2000 CSP) Goal 3 and associated Policies 1 through 6, which direct that all necessary improvements shall be installed or funded, or bonded for prior to recordation of a final map for any subsequent subdivision under the CSP.

As explained further below, the proposed project being evaluated in this Addendum reflects a refined network of upgrades to existing water and sewer infrastructure proposed by the District (which is the identified utility provider for the CSP area, as noted in the SNCSP Final EIR), which the District has identified as necessary and/or appropriate to serve the existing and projected residential and commercial growth to occur within the existing and anticipated service area for the District, located in the unincorporated area of Santa Nella, in Merced County, California. The proposed upgrades contemplate service for the planned Parkway and Arnaudo projects (both of which are specific development projects that were previously approved by Merced County pursuant to the CSP), as well as other existing and planned growth within the District's service area. The proposed improvements identified in the Water Master Plan and the Sewer Master Plan would be constructed within the CSP boundary (referred to herein as the "improvement area"), with the exception of Well No. 2 and a portion of its transmission pipeline, which are located outside the CSP boundary.

As discussed in the SNCSP Final EIR, at the time that CEQA document was prepared, not all of the land within the SNCSP was within the jurisdictional boundaries of the District. However, since that time, the Local Agency Formation Commission (LAFCo) approved (subject to certain conditions) a request to amend the District's sphere of influence and annex these lands into the District's service area.

2.1 - Location and Project Background

Santa Nella is an unincorporated community located in western Merced County, approximately 9 miles northwest of Los Banos and 48 miles south of Tracy. The project site is bounded by the O'Neill Forebay to the west, agricultural lands to the north and east, and the California Aqueduct to the south. The regional location map is shown in Exhibit 1. The location of the improvements discussed in the WMP and SMP are shown in Exhibit 2a and Exhibit 2b, respectively, on an aerial overlay.

Today, the area is characterized as transitional agricultural and foothill pasture land, the majority of which is used now or historically for agriculture. Santa Nella, however, has long been recognized as

an area of future growth in the Merced County General Plan. In 1978, a Specific Urban Development Plan (SUDP) area was established for Santa Nella into which future growth was to be concentrated in a way that balances projected population growth with employment-generating land uses and ensures adequate provision of public services. Subsequently, in 1980 a Community Specific Plan (CSP) was adopted for Santa Nella, envisioning a community of 4,500 residents concentrated around O'Neill Forebay with highway commercial and light industrial uses providing employment for local residents. Then in 2000, the CSP Area was expanded to encompass additional lands of 2,560 acres to accommodate additional planned growth and a programmatic EIR (CSP EIR)[2] was prepared to analyze the potential impacts of this expansion, including the consideration of 6,483 new dwelling units, and over 5.5 million square feet of commercial and industrial uses. The 2030 General Plan as well as the 2000 CSP contemplated that the District, as the identified service provider for the unincorporated Santa Nella community, would maintain and expand its water and sewer systems in order to meet the development needs of Merced County.

Consistent with the relevant provisions of the 2030 General Plan, the 2000 CSP Update, and the CSP EIR, the District has prepared the SMP and the WMP (collectively, the "Master Plans") for the reasons set forth above. The SMP study area and the WMP study area, collectively, shall be referred to herein as the Master Plan Study Area. As explained above and more fully therein, the Master Plans identify the required infrastructure and improvement needs to serve the anticipated development within the Master Plan Study Area (including lands within the planned Parkway and Arnaudo developments as well as other existing and planned growth). While the infrastructure and improvements were generally envisioned in the 2000 CSP and CSP EIR to support the planned growth (including the Parkway and Arnaudo projects) described in the 2030 General Plan and the 2000 CSP, the specific scope and other details of the infrastructure and improvements have been further defined in the Master Plans.

2.2 - Environmental Setting

2.2.1 - Existing Water System Description

As described more fully in the WMP, Exhibit 2a provides an overview of the existing and proposed water system facilities. The District's existing water system consists of surface water supply, treatment, storage, groundwater supply, and distribution facilities. District facilities include: a raw surface water treatment plant (SWTP) site where raw water is pumped from the San Luis Canal/California Aqueduct, treated, and stored; a groundwater well site (Well No. 1); a distribution center where well water is stored and blended with surface water prior to distribution to the system via booster pumps, and a 4-inch diameter to 30-inch diameter transmission and distribution piping.

[2] The Santa Nella Community Specific Plan Recirculated Program Environmental Impact Report (SCH No. 92032043) (May 5, 2000) (and attached appendices) and the Santa Nella Community Specific Plan Final Recirculated Program Environmental Impact Report (SCH No. 92032043) (February 1, 2001), collectively, constitute the CSP EIR for purposes of this Addendum.

Source: Census 2000 Data, The CaSIL

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Exhibit 1
Regional Location Map

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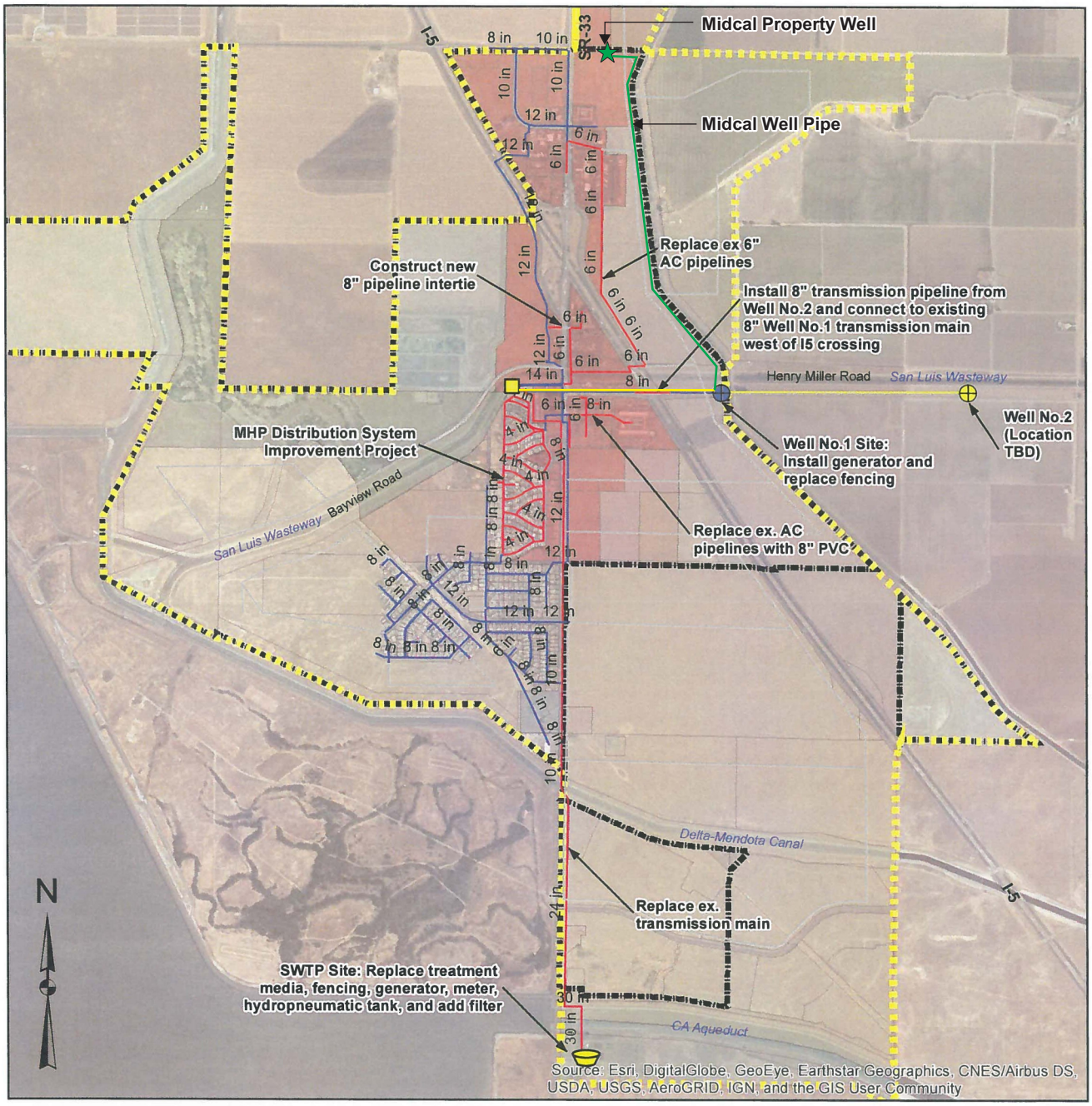

Source: Santa Nella County Water District Water Master Plan.

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Exhibit 2a
Water Master Plan Improvements

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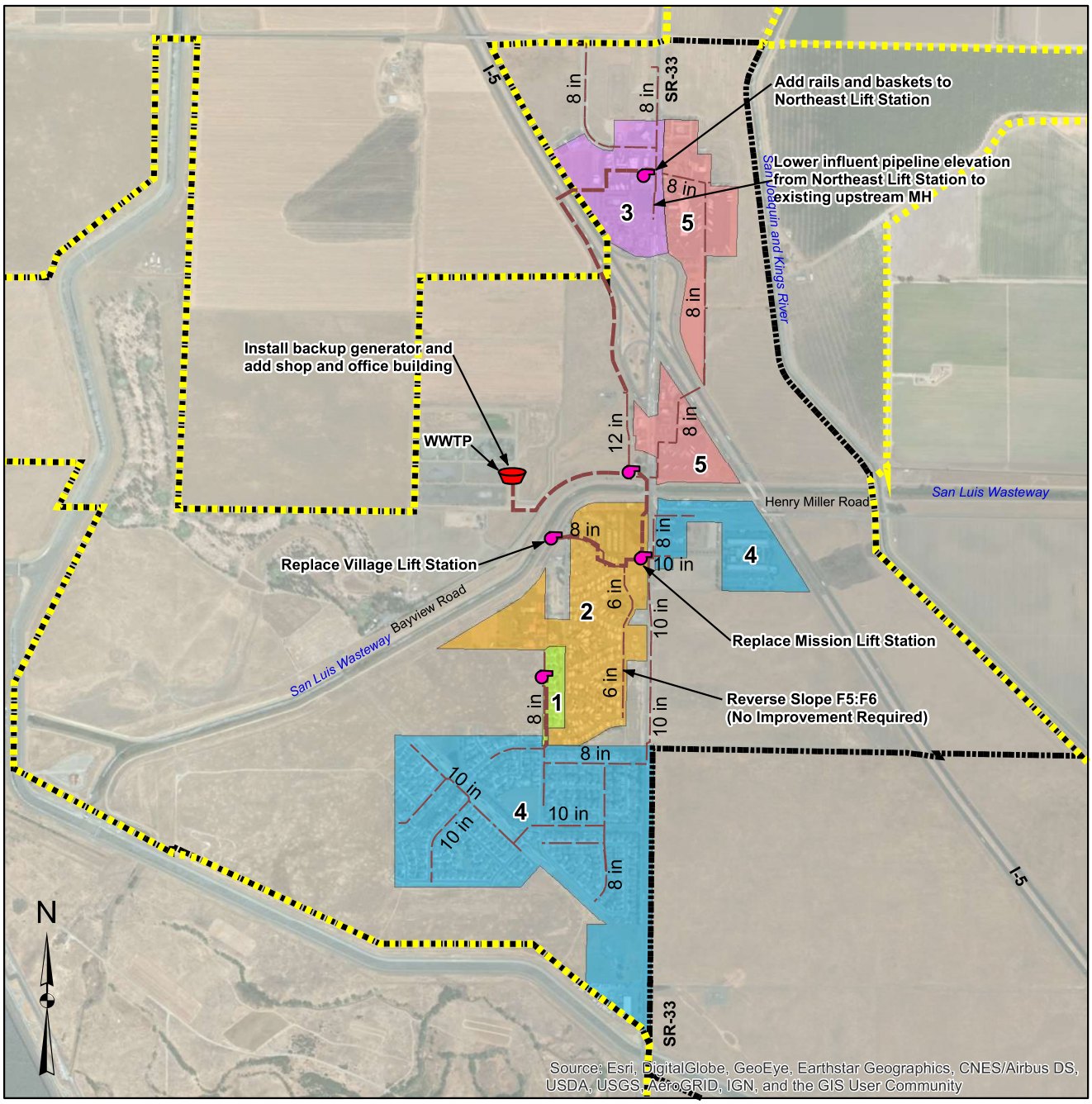

Source: Santa Nella County Water District Sewer Master Plan.

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Exhibit 2b
Sewer Master Plan Improvements

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2.2.2 - Existing Sewer System Description

As described more fully in the SMP, wastewater generated by the District service area is collected and conveyed to the existing wastewater treatment plant through a network of gravity sewer pipelines, lift stations, and force mains. This chapter describes the existing sewer system facilities. Exhibit 2b provides an overview of the existing and proposed sewer system facilities.

2.3 - Project Characteristics

2.3.1 - Proposed Project

As described in the Master Plan, the District's objective in preparing and approving the Master Plans is to evaluate the existing water supply, treatment, distribution and storage systems; and the existing wastewater collection, treatment, and disposal facilities, and to utilize this information to identify outstanding needs for improvements to ensure the District has adequate facilities to support future planned growth consistent with the relevant goals and policies set forth in the 2030 General Plan and the 2000 CSP.

Future demand projections were developed for buildout of the SMP study area, including several known planned developments. Known planned developments include the Parkway development (consisting of Parkway South and Parkway East) and the Arnaudo development. The planned Arnaudo development consists of approximately 429 acres within the existing SUDP. The planned Parkway development consists of approximately 209 acres within the existing SUDP, and 540 acres within the CSPA. Recommendations for infrastructure improvements have been based on projected demands for buildout of the SMP study area, herein referred to as "future development." The improvements, which would be installed within the "improvement area" (as shown in Exhibit 2a) would be constructed within the Master Plan Study Area, with the exception of Well No. 2 and its transmission pipeline.[3]

For purposes of this analysis, the proposed project consists of the installation of the required infrastructure and improvements needed to serve the Master Plan Study Area as further described in the Master Plans. The areas of disturbance required to complete the infrastructure improvements are shown in Exhibit 3. The 10-year and 25-year planning horizons contemplated in the Master Plans anticipate buildout of the Master Plan Study Area within those time frames, consistent with the planned growth identified in the 2030 General Plan and the 2000 CSP. As described more fully in the Master Plans, it is anticipated that the planned Parkway and Arnaudo developments would occur during the 10-year horizon, with remaining buildout occurring within the 25-year horizon.

Specifically, the Master Plans identify the following project components that are analyzed in this assessment in terms of potential environmental impacts.

[3] As described more fully in the Water Master Plan, Well No. 2 and its related transmission line is a separate improvement that has been proposed by the Parkway developers for purposes of bringing an additional groundwater supply to the District, and is not considered one of the District's recommended capital improvement projects in the WMP.

Water Master Plan

Recommended Capital Improvement Projects

The District has identified Capital Improvement Projects (CIPs) needed for the continued reliable operation of water infrastructure to accommodate existing and future developments in the Master Plan Study Area. As discussed more fully in the WMP, these CIPs address the age of facilities or lack of reliability and redundancy of existing facilities, as well as the repair, replacement, and/or addition of equipment and site infrastructure. The following CIPs would be constructed within the WMP study area (including approximately 54 acres of land outside the CSP area located east of Interstate 5 (I-5), proposed to be annexed into the SUDP area, to accommodate the proposed Well No. 2 and associated transmission line, as shown in Exhibit 2a). The following sections summarize recommended CIPs that are analyzed as part of this analysis:

Well No. 1

Improvements to the existing Well Site No. 1 would:

- Install generator for backup power.
- Replace site fencing.

Surface Water Treatment Plant

Improvements to the existing SWTP and equipment would:

- Replace treatment filter media and tube settlers.
- Add new packaged treatment filter.
- Add structure building to cover/house treatment filter units.
- Replace effluent flow meter that is currently inoperable.
- Replace fencing around facility to improve site security.
- Replace hydropneumatic tank (SWTP building supply).
- Replace generator.

Transmission, Storage, and Distribution

The following summarizes the recommended transmission main CIPs:

- Replace approximately 1,100 linear feet of 30-inch-diameter, 3,196 linear feet of 24-inch-diameter, and 6,915 linear feet of 10-inch-diameter transmission main pipeline.

The following summarizes the planned blending and distribution CIPs:

- Construction of Well No. 2 and site infrastructure, including provisions for back-up power, on Henry Miller Avenue, east of Well No. 1.
- Construction of two interconnected 750,000-gallon tanks, with bypass capability to permit maintenance and repair at blending/distribution site.
- Construction of approximately 4.6 miles of new 8-inch-diameter transmission pipeline from Well No. 2 with a connection to the existing Well No. 1 transmission pipeline east of I-5.

- Replacement of 6-inch-diameter transmission pipeline from Well No. 1 with 8-inch-diameter transmission pipeline crossing I-5.
- Construction of a new 10,000-gallon water storage tank for well pump control at blending/ distribution site.
- Construction of new booster pump station at blending/distribution site.
- Replacement of the hydropneumatic tank at blending/distribution site.

The following summarizes CIPs recommended to replace the District distribution system pipelines and for the installation/replacement of water meters:

- Replace approximately 1,500 linear feet of existing 6-inch-diameter and 1,000 linear feet of 8-inch-diameter asphalt cement distribution pipelines serving existing commercial area east of State Route 33 (SR-33), south of Henry Miller Road.
- Replace existing 6-inch-diameter asphalt-cement distribution pipelines serving existing commercial area east of SR-33 and north of I-5.
- Mobile Home Park Water Distribution System Improvement Project: Replacement of existing 4-inch, 6-inch, and 8-inch-diameter asphalt-cement and galvanized steel distribution pipelines approximately 12,100 linear feet of 4-inch-diameter distribution, 6,200 linear feet of 6-inch-diameter pipeline, replacement of existing service laterals to residential and commercial services, installation of remote-read water meters on new service laterals, and installation of remote-read tower equipment and software.
- Upgrade existing residential and commercial manual read water meters to remote-read water meters.

10-year Planning Horizon System Improvements

The following 10-year planning horizon improvements are recommended to serve future development within the Master Plan Study Area, and are analyzed as part of this analysis:

- Construction of new 8-inch to 12-inch-diameter distribution piping.
- Construction of additional water storage totaling 1.4 million gallons (mg).
- Construction of booster pump station.

25-year Planning Horizon System Improvements

The following 25-year planning horizon improvements are recommended to serve future development within the Master Plan Study Area, and are analyzed as part of this analysis:

- Construction of new 8-inch to 12-inch-diameter distribution piping.
- Construction of additional water storage totaling 2 mg.
- Construction of a booster pump station.

Sewer Master Plan

Recommended Capital Improvement Projects

The District has identified CIPs needed for continued reliable operation of sewer infrastructure to accommodate existing and future developments in the Master Plan Study Area. As discussed more fully in the SMP, these CIPs address operational and/or maintenance issues caused by the age of existing facilities or lack of reliability. The following CIPs would be constructed entirely within the SMP study area (see Exhibit 2b). The following sections summarize recommended CIPs that are analyzed as part of this analysis:

Lift Stations

The following CIPs are recommended to improve operation and reliability at each lift station:

- Northeast Lift Station Improvements—Install baskets and rails to prevent clogging of the existing pumps to improve maintenance. Replace 30 linear feet of 8-inch gravity sewer influent pipeline.
- Village Lift Station Improvements—Upgrade/Replace Village Lift Station to improve operation, maintenance, and reliability. Install new backup generator. No capacity increase is needed as the service area will not develop further.
- Mission Lift Station Improvements—Replace existing lift station with wet well configuration and submersible pumps to improve operation, maintenance, and reliability. Install new backup generator. The new lift station shall have space available to accommodate additional pumps to accommodate future development flows.
- Replacement of Northeast Lift Station influent sewer pipe to correct negative slope.

Wastewater Treatment Plant

The District has completed recent upgrades to the existing wastewater treatment plant to increase treatment and storage capacity, and improve the headworks facility. However, the District has a CIP to make the following improvements:

- Installation of back-up generator for emergency power for aerators and headworks facilities.
- Construction of an equipment shop and laboratory with offices for District staff.

10-year Planning Horizon Recommended Improvements

The SMP has also developed other longer-term CIP recommendations. However, at the time of this analysis, the details of the design of these future-recommended improvements have not yet been determined, and thus, this analysis evaluates these CIPs to the extent information is available in the SMP.

The following 10-year planning horizon improvements are recommended to serve future development within the SMP study area, and are analyzed as part of this analysis:

- Upgrade Mission Lift Station capacity (1.7 million gallons per day [mgd] total capacity).

- Upgrade Bayview Lift Station capacity (3.1 mgd total capacity).
- Upsizing of approximately 2,300 linear feet of existing 10-inch gravity sewer pipeline with a 16-inch pipeline.
- New sewer lift station (0.84 mgd) and approximately 10,000 linear feet of 8-inch-diameter force main (Service Area 7).
- New sewer lift station (0.5 mgd) and approximately 3,500 linear feet of 8-inch-diameter force main (Service Area 6).
- Construction of approximately 274,000 linear feet of 8-inch gravity pipeline (Service Area 8).

25-year Planning Horizon Recommended Improvements

The following 25-year planning horizon improvements are recommended to serve future development within the SMP study area, and are analyzed as part of this analysis:

- Upgrade Mission Lift Station capacity (2.5 mgd total capacity).
- Upgrade Bayview Lift Station capacity (3.1 mgd total capacity).
- Upsizing of approximately 2,300 linear feet of existing 8-inch gravity sewer pipeline with an 18-inch pipeline.
- New sewer lift station (1.1 mgd) and approximately 10,000 linear feet of 8-inch-diameter force main (Service Area 9).
- New sewer lift station (0.5 mgd) and approximately 3,500 linear feet of 8-inch-diameter force main (Service Area 6).

Additional Well Improvements Analyzed in this Addendum

In addition to the above-described CIPs, Section 9.0 of the WMP generally addresses future water sources and water management strategies. One such potential additional source (to be pursued by the developer of the Parkway project) that, if permitted in accordance with applicable laws and regulations and constructed, would augment the District's groundwater supply is known as the "Mid-Cal Property Well and related Transmission Main." While this well and related transmission main is not included in the CIPs in the WMP, for purposes of a conservative analysis, this CEQA analysis evaluates the potential environmental impacts if such well and the related improvements (consisting of approximately 1.5 miles of conveyance using 8-inch-diameter pipe to carry water to the District blending facility) were installed. All proposed areas of disturbance required to complete the infrastructure improvements are shown in Exhibit 3.

2.4 - Discretionary Approvals

The proposed project would not require any additional discretionary approvals from the County of Merced.

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SECTION 3: CEQA CHECKLIST

The purpose of this checklist is to evaluate the categories in terms of any changed condition (e.g., changed circumstances, project changes, or new information of substantial importance) that may result in a changed environmental result that could trigger additional environmental review (e.g., a new significant impact or substantial increase in the severity of a previously identified significant effect) (CEQA Guidelines § 15162).

The questions posed in the checklist come from Appendix G of the CEQA Guidelines. A "no" answer does not necessarily mean that there are no potential impacts relative to the environmental category, but rather that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the SNCSP Final EIR. These environmental categories might be answered with a "no" in the checklist, since the proposed project does not introduce changes that would result in a modification to the conclusion of the previously approved CEQA document.

This addendum addresses the conclusions of the SNCSP Final EIR.

3.1 - Explanation of Checklist Evaluation Categories

(1) Conclusion in SNCSP Final EIR and Related Documents

This column summarizes the conclusion of the SNCSP Final EIR relative to the environmental issue listed under each topic.

(2) Do the Proposed Changes Involve New Impacts?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(1), this column indicates whether the changes represented by the proposed project will result in new significant environmental impacts not previously identified or mitigated by the SNCSP Final EIR or whether the changes will result in a substantial increase in the severity of a previously identified significant impact.

(3) New Circumstances Involving New Impacts?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(2), this column indicates whether there have been substantial changes with respect to the circumstances under which the proposed project is undertaken that will require major revisions to the SNCSP Final EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

(4) New Information Requiring New Analysis or Verification?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(3)(A-D), this column indicates whether new information of substantial importance, which was not known and could not have been

known with the exercise of reasonable diligence at the time the SNCSP Final EIR was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If the additional analysis completed as part of this addendum were to find that the conclusions of the SNCSP Final EIR remain the same such that no new significant impacts are identified, or identified impacts are not found to be substantially more severe, or additional mitigation is not necessary, then the question would be answered "no" and no additional environmental review would be required.

(5) Mitigation Measures Implemented to Address Impacts

Pursuant to CEQA Guidelines Section 15162, subd. (a)(3), this column indicates whether the SNCSP Final EIR provided mitigation measures to address effects in the related impact category. Any previously adopted mitigation measures that are relevant to the proposed project will be identified. The addendum analyses will also address whether any proposed revisions to previously adopted mitigation measures are recommended. These mitigation measures will be implemented with the construction of the proposed project, as applicable and as determined appropriate by the District, as the lead agency for purposes of the implementation of the Master Plans. If "N/A" is indicated, the SNCSP Final EIR concluded that the impact either would not occur or is not significant, and, therefore, no additional mitigation measures are needed.

3.2 - Discussion and Mitigation Sections

(1) Discussion

A discussion of the elements of the checklist is provided under each environmental category in order to clarify the answers. The discussion provides information about the particular environmental issue (both with respect to the original SNCSP Final EIR and the proposed project), how the proposed project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

(2) Mitigation Measures

Applicable mitigation measures from the SNCSP Final EIR that apply to the proposed project are listed under each environmental category. In some instances, mitigation language is refined to reflect current best practices; however, no new mitigation measures beyond those identified in the SNCSP Final EIR are necessary for purposes of addressing impacts of the proposed project.

(3) Conclusions

A discussion of the conclusion relating to the analysis is contained in each section.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
I. Aesthetics					
Would the project:					
a) Have a substantial adverse effect on a scenic vista?	Less than significant	No	No	No	N/A
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less than significant	No	No	No	N/A
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	Less than significant	No	No	No	N/A
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than significant	No	No	No	N/A
e) Conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an adverse visual impact?	Less than significant	No	No	No	N/A

Discussion

Aesthetic impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis, which identified one potential impact utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance.

a)–e) Summary of SNCSP Final EIR

The initial study prepared for the SNCSP identified the potential for light and glare impacts associated with buildout of the Plan and concluded that implementation of Design Guidelines would reduce potential impacts to less than significant.

Proposed Project Analysis and Conclusion

Implementation of the proposed project would primarily consist of improvements to existing infrastructure systems and facilities. The proposed project would also include installation of new transmission lines and a new well site. These improvements are primarily underground and therefore would not result in any impacts to aesthetic resources. Therefore, the proposed project would not introduce new significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to aesthetics. Further, no new mitigation measures or alternatives are required. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
II. Agricultural Resources					
Would the project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Less than significant after mitigation	No	No	No	MM 4.8-1
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No impact	No	No	No	N/A
c) Involve other changes to the existing environment which, due to their location or nature, could result in conversion of farmland to other non-agricultural use?	No impact	No	No	No	N/A

Discussion

Agricultural resources impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis, which identified one potential impact utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance.

a)–c) Summary of SNCSP Final EIR

The SNCSP Final EIR considered whether the SNCSP development would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. As described in the SNCSP Final EIR, buildout of the SNCSP would convert 350 acres of productive farmland to non-agricultural uses. Implementation of Mitigation Measure (MM) 4.8-1, which requires the conveyance of a conservation easement that would permanently protect agricultural lands of similar or better quality as that farmed on the project site, would reduce the level of impact to less than significant.

Proposed Project Analysis and Conclusion

Implementation of the proposed project would primarily consist of improvements to existing infrastructure systems and facilities. The proposed project would also include installation of new transmission lines and a new well site. These improvements would occur within the SUDP area that was analyzed in the SNCSP Final EIR. In addition, the proposed project must comply with the requirements of MM 4.8-1 of the Final EIR, which would reduce potential impacts to agricultural land to less than significant. Conservation easements for the conversion of agricultural lands have been recorded as part of the implementation of individual development projects that have occurred since 2000, and will continue to be implemented as new development is approved. The proposed project would not introduce new significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

MM 4.8-1 The project sponsors shall convey to the County or its designated agent a conservation easement that would permanently protect agricultural land of similar or better quality as that farmed on the project site. These mitigation lands may be located mutually agreed upon by the applicant and the County Planning and Community Development Director.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to agricultural resources. Further, no new mitigation measures or alternatives are required. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
III. Air Quality					
Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	Significant and unavoidable	No	No	No	N/A
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Significant and unavoidable	No	No	No	MM 4.3-1 MM 4.3-2 MM 4.3-3 MM 4.3-4
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Significant and unavoidable	No	No	No	N/A
d) Expose sensitive receptors to substantial pollutant concentrations?	N/A	No	No	No	MM 4.3-1 MM 4.3-2 MM 4.3-3 MM 4.3-4
e) Create objectionable odors affecting a substantial number of people?	N/A	No	No	No	N/A

Discussion

Air quality impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis. The EIR identified three potential impacts utilizing the above

environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance. The SNCSP Final EIR air quality impact discussions collectively address the above environmental issue areas as described below.

a–e) Summary of SNCSP Final EIR

The SNCSP Final EIR determined that the impact from temporary construction emissions, including stationary equipment and mobile construction equipment emissions, would be significant. While implementation of MM 4.3-1, MM 4.3-2, and MM 4.3-3, which require the use of properly maintain equipment, use of electric or diesel-powered vehicles in lieu of gasoline-powered vehicles, and minimization of obstructions to vehicular traffic through the use of a flag person, where needed to maintain safety, would reduce these impacts, the SNCSP Final EIR concludes that the impact from temporary construction emissions would remain potentially significant after mitigation.

The SNCSP Final EIR determined that the impact from temporary construction fugitive dust emissions would be potentially significant. While implementation of MM 4.3-4, which requires implementation of best practices as outlined in Regulation VIII of the San Joaquin Valley Air Pollution Control District, would reduce this impact, the SNCSP Final EIR concludes that the impact from temporary construction fugitive dust emissions would remain potentially significant after mitigation.

The SNCSP Final EIR determined that long-term regional impacts due to emissions attributable to the change in land use would be significant. No mitigation beyond the implementation of the goals and policies of the CSP is identified, and the SNCSP Final EIR concluded that impacts would remain significant and unavoidable after mitigation.

Proposed Project Analysis and Conclusion

All mitigation from the SNCSP Final EIR remain applicable to the proposed project. The District cannot at this time identify the detailed construction activities for pipeline replacement, or required stationary source information, including capacity, number of equipment, and operation hours. Therefore, the specific quantified volume of emissions cannot be calculated. It is assumed that, consistent with the conclusions of the SNCSP Final EIR, potential impacts would remain significant and unavoidable after implementation of MM 4.3-1 through MM 4.3-4. The proposed project would not introduce new significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required, although the text of the mitigation measures is refined to reflect current best practices and guidance from the SJVAPCD.

Mitigation Measures

Air quality mitigation measures from the SNCSP Final EIR applicable to the proposed project are listed below:

MM 4.3-1 **(text is refined to reflect current SJVAPCD best practices)**

During construction, all equipment shall be maintained in good operating condition so as to reduce emissions. The construction contractor shall ensure that all construction equipment is being properly serviced and maintained in accordance with the manufacturer's specification. Maintenance records compliant with SJVAPCD Rule 9510 shall be available at the construction site for City verification and submitted to the District within 30 days of completing construction for each project phase. Construction equipment records shall comply and include all required information (e.g., total hours per equipment type, equipment model year and horsepower) detailed in SJVAPCD's Detailed Fleet Template (SJVAPCD 2009b).

The following measures shall be applied to all WMP and SMP infrastructure and improvements during construction:

- Adhere to the provisions of SJVAPCD Rule 4601
- Use paints with a volatile organic compound (VOC) that average 65 grams per liter for both interior and exterior coatings.
- Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors.
- Use compliant low VOC cleaning solvents to clean paint application equipment.
- Keep all paint and solvent laden rags in sealed containers to prevent VOC emissions.

MM 4.3-2 Electric or diesel-powered equipment shall be utilized in lieu of gasoline-powered engines where possible.

MM 4.3-3 Construction activities shall minimize obstruction of through traffic lanes adjacent to the site and, if necessary, a flagperson shall be retained to maintain safety adjacent to existing roadways.

MM 4.3-4 **(text is refined to reflect current SJVAPCD best practices)**

The owner/operator shall sufficiently implement at least one of the control measures listed below to limit visible dust emissions (VDE) to 20 percent opacity or to comply with the conditions for a stabilized surface as defined in Rule 8011. The opacity limit may be achieved through implementation of any combination of the following control measures to the extent needed:

On-Site Transporting of Bulk Materials

- Limit vehicular speed while traveling on the work site sufficient to limit VDE to 20 percent opacity; or
- Load all haul trucks such that the freeboard is not less than 6 inches when material is transported across any paved public access road; or

- Apply water to the top of the load sufficient to limit VDE to 20 percent opacity; or
- Cover haul trucks with a tarp or other suitable cover.

Unpaved Vehicle/Equipment Parking and Traffic Areas

The control measures listed below shall be implemented on unpaved surface areas dedicated to any vehicle and equipment parking and traffic activity in order to limit VDE to 20 percent opacity and comply with the requirements of a stabilized unpaved road as specified in Rule 8011. If vehicle activity remains exclusively within an unpaved vehicle/equipment traffic area, section 5.3 may be implemented to limit VDE to 20 percent opacity.

- Where 50 or more annual average daily trips (AADT) will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall limit VDE to 20 percent opacity and comply with the requirements of a stabilized unpaved road by the application and/or reapplication/maintenance of at least one of the following control measures:
  - Watering;
  - Uniform layer of washed gravel;
  - Chemical/organic dust suppressants;
  - Vegetative materials;
  - Paving;
  - Roadmix;
  - Any other method(s) that can be demonstrated to the satisfaction of the Air Pollution Control Officer that effectively limits VDE to 20 percent opacity and meets the conditions of a stabilized unpaved road.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to air quality. For impacts determined to be significant and unavoidable, in accordance with CEQA, all feasible mitigation should be incorporated into the proposed project. Since the time of the adoption of the SNCSP Final EIR, additional best management practices have been developed to further reduce emissions, as refined by this Addendum. Therefore, the modified project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
IV. Biological Resources					
Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Less than significant with mitigation	No	No	No	MM 4.10-1 through MM 4.10-7, MM 4.10-14 through MM 4.10-16, and MM 4.10-18 through MM 4.10-20
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No impact	No	No	No	N/A
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than significant with mitigation	No	No	No	MM 4.10-8 through MM 4.10-13

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No impact	No	No	No	N/A
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No impact	No	No	No	N/A
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No impact	No	No	No	N/A

Discussion

a) Summary of SNCSP Final EIR

The SNCSP Final EIR identified plant and animal species of concern with the potential to occur on site.

In regards to plant species, the potential presence of delta wooly marbles (*Psilocarphus brevissimus* var. *Multiflorus*) and the forked fiddleneck (*Amsinckia varnicosa*), which were identified in the SNCSP Final EIR, are related to vernal pool habitat and valley grasslands, respectively. The SNCSP Final EIR concluded that impacts to vernal pool habitat would result in potentially significant impacts and MM 4.10-10 and MM 4.10-11 would reduce potential

impacts to less than significant. The SNCSP Final EIR concluded that potential impacts to forked fiddleneck would be less than significant and no mitigation would be required.

In regards to animal species, the SNCSP Final EIR identified potential impacts to kit fox (*Vulpes macrotis mutica*), giant garter snake (*Thamnophis gigas*), burrowing owl (*Athene cunicularia*), and nesting raptors. The SNCSP included MM 4.10-1 through MM 4.10-7, MM 4.10-12 through MM 4.10-21, the implementation of which would ensure that impacts from development upon special status species or their habitats would be reduced to less than significant.

Proposed Project Analysis and Conclusion

In November 2017, FCS biologists conducted an updated database search for potential plant and animal species and conducted a field survey of all proposed disturbance areas shown in Exhibit 3.

In regards to plant species, the survey confirmed that the proposed project would not result in any potential impacts to vernal pools and thus MM 4.10-10 and MM 4.10-11, related to protection for the delta wooly marbles, would not be applicable to the proposed project. No other plant species were found to be potentially present in the improvement area and thus, no further analysis or mitigation is required.

In regards to animal species, the proposed project could potential affect special status animal species and/or their habitat, as analyzed in the SNCSP Final EIR.

Implementation of MM 4.10-1 through MM 4.10-9, and MM 4.10-14 through MM 4.10-21, as would reduce impacts to less than significant. No additional analysis is required.

b) Summary of SNCSP Final EIR

The SNCSP Final EIR did not identify the presence of any riparian habitat or other sensitive natural community. No mitigation measures were listed and no impacts were expected from project development.

Proposed Project Analysis and Conclusion

The Biological Resources Assessment (BRA) concluded that no new impacts to riparian habitat or other sensitive natural communities are expected due to project development. Therefore, the proposed project would not introduce new significant environmental impacts or create more severe environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

c) Summary of SNCSP Final EIR

The SNCSP Final EIR lists the project site as containing emergent wetland and vernal pool habitat. As such, the proposed project requires MM 4.10-8 and MM 4.10-9 to reduce impacts to less than significant levels.

Proposed Project Analysis and Conclusion

The BRA concluded that areas of potential jurisdiction could occur in association with man-made features that convey water. A wetland determination must be conducted to determine if these potential jurisdictional areas that would be affected meet the necessary criteria to be considered jurisdictional and is only required if these features would be filled or otherwise adversely affected. As such, MM 4.10-8 and MM 4.10-9 remain applicable and would reduce any potential impacts to less than significant levels. The text of these mitigation measures is refined as shown below to reflect current best practices for the protection of wetlands.

d) Summary of SNCSP Final EIR

The SNCSP Final EIR does not identify the interferences of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. As such, no impacts are expected and no additional mitigation measures or analysis is required.

Proposed Project Analysis and Conclusion

The BRA concluded that no new impacts to native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites would occur with implementation of the proposed project. Therefore, the proposed project would not introduce new significant environmental impacts or create more severe environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

e) Summary of SNCSP Final EIR

The SNCSP Final EIR does not identify any local tree ordinances or preservation measures that need to be followed during the construction of the proposed project. As such, no impacts are expected and no additional mitigation measures or analysis is required.

Proposed Project Analysis and Conclusion

The BRA concluded that implementation of the proposed project would not conflict with any tree ordinance or preservation measures. Therefore, the proposed project would not introduce new significant environmental impacts or create more severe environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

f) Summary of SNCSP Final EIR

The SNCSP Final EIR concludes that the project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As such, no impacts would occur due to project construction.

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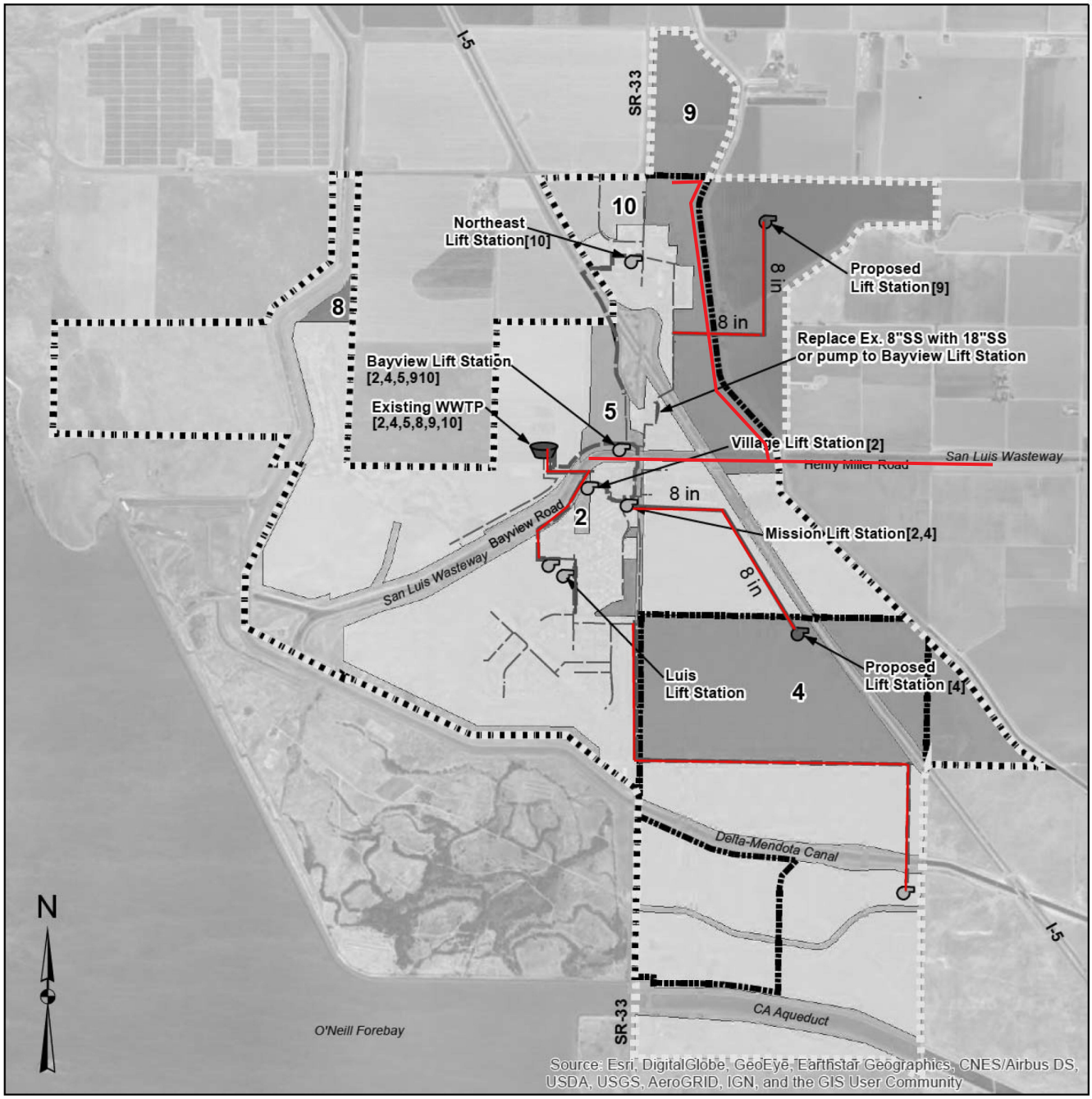

Source: Santa Nella County Water District Sewer Master Plan.

Exhibit 3
Proposed Ground Disturbance
In Previously Undisturbed Areas

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Proposed Project Analysis and Conclusion

Similar to the SNCSP Final EIR, the BRA concluded that the proposed project does not lie within any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As such, no impacts would occur. Therefore, the proposed project would not introduce new significant environmental impacts or create more severe environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

Biological resources mitigation measures from the SNCSP Final EIR applicable to the proposed project are listed below:

MM 4.10-1 On- and Off-site Mitigation

Loss of suitable habitat for breeding, foraging, and movement shall be mitigated by either preserving habitat on-site, or by acquiring suitable habitat off-site. Loss of agricultural dry-farmed hayland and non-native grassland will be mitigated at a 1:1 ratio on-site if contiguous with established kit fox corridors and a 3:1 ratio off-site. Loss of agricultural fallow will be mitigated at a 1:1 ratio on-site if the agricultural land is converted into habitat suitable for kit fox and is contiguous with established kit fox corridors. Otherwise, loss of this habitat will be mitigated at a 2:1 ratio off-site. Loss of agricultural orchards will be mitigated at a 1:2 ratio on-site if the land is converted into habitat suitable for kit fox and is contiguous with established kit fox corridors. Otherwise, loss of this habitat will be mitigated at a 1:1 ratio off-site (see Appendix I, Mitigation for Habitat Losses). Mandatory on-site land dedication necessary to meet minimum corridor widths will be credited toward on-site mitigation.

Off-site replacement will be located as close as possible to the Plan area. Specific locations of proposed off-site mitigation are shown in Figure 28. These areas include properties currently owned by The Nature Conservancy (Romero and Simon-Newman) and lands held and managed in Trust by the Bank of America (Quinto). Negotiations are underway with the current landowners. Additionally, lands connecting the CSP with the Romero or Quinto Ranches would be appropriate.

MM 4.10-2 Establishment of Movement Corridors

Corridors with specific design parameters will be established within the Santa Nella CSP area to allow for movement between a subpopulation of kit foxes south of Highway 152 and south of Santa Nella and suitable habitat and other subpopulations of kit foxes northwest of Santa Nella. I-5 and the canals running north and south through the CSP area potentially constrict opportunities for movement. However, established right-of-ways provide an opportunity to maintain a continuous, connected movement corridor. The enhancement of these right-of-ways is the basis of the

proposed mitigation. Primary corridors will be established along the California Aqueduct, Delta-Mendota Canal, San Luis Wasteway, and Outside Canal, with a secondary corridor along I-5. Figure 29 shows the locations of these corridors, as well as the locations of enhancements that will be developed as part of the plan. Corridor enhancement includes establishing refuge areas for kit foxes along the corridor, as well as, providing escape burrows at regular intervals, establishing fencing, and a new kit fox crossing, implementing appropriate leash laws and developing a Memorandum of Understanding with the US Bureau of Reclamation (USBR), the California Department of Water Resources (DWR), and the California Department of Transportation to ensure coordinated management of the corridors.

MM 4.10-3 Coordination with Other Developments to Reduce Cumulative Impacts

Several projects are proposed close to the Santa Nella CSP area. Development of these projects and the CSP area could adversely affect the kit fox due to increased traffic mortalities, blocked or lengthened movement corridors, and a loss of suitable foraging and denning habitat. Measures proposed in the mitigation plan for the kit fox will be coordinated with these other proposed projects to mitigate for these cumulative impacts. Placing corridors so they remain continuous and ensuring opportunities for kit foxes to by-pass barriers (such as canals) will be especially important. Monitoring will be conducted to assess the success of the movement corridors (see Appendix I, Coordination with Other Potential Developments).

MM 4.10-4 Predator Control

Fencing, escape burrows, and other management measures prescribed by MM 1 and 2 will reduce the likelihood of coyote, red fox, and domestic dog predation upon kit foxes. Monitoring results will determine the need for active predator control and provide a basis for determining appropriate management strategies (see Appendix I, Predator Control).

MM 4.10-5 Coordination with Public Agencies

CDFW, the UUSBR, and DWR own and oversee the use and maintenance of lands within and adjacent to the CSP area. Merced County will work to establish a cooperative management agreement among those agencies having kit fox corridor responsibility within the CSP area and will coordinate with agencies outside the CSP area to ensure the continuity in conservation planning for the kit fox (see Appendix I, Coordination With Public Agencies).

MM 4.10-6 Monitoring

A monitoring program, primarily relying upon den surveys within the movement corridors, will be implemented to evaluate the efficacy of the mitigation measures, especially the use of established corridors by kit foxes. Results from monitoring will

also be used to modify features of the corridor and crossing to better serve the kit fox. The monitoring effort will be developed in consultation with both CDFW and USFWS (see Appendix I, Monitoring).

MM 4.10-7 Preconstruction Surveys and Construction Recommendations

Although kit foxes are not known to currently reside in the CSP area, construction and ground disturbance may result in take of occupied dens and individuals. Standard preconstruction and construction recommendations (USFWS 1997b or as updated prior to construction activities) will be followed to avoid this type of direct take. Preconstruction surveys shall be contacted no less than 14 days and no more than 30 days prior to the beginning of ground disturbance and/or construction activities or any project activity likely to impact the San Joaquin kit fox.

An employee education program shall be conducted for any project that has expected impacts to kit foxes or other endangered species. A 20-mph speed limit shall be posted and enforced for all project-related vehicles in all project areas, except on county roads and State and Federal highways; this speed limit is particularly important at night when kit foxes are most active. Night-time construction shall be minimized to the extent possible. Off-road traffic outside of designated project areas shall be prohibited.

All excavated, steep-walled holes or trenches more than 2 feet deep shall be covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks to prevent inadvertent entrapment of kit foxes or other animals during the construction phase of the project. Such holes or trenches shall be thoroughly inspected for trapped animals before they are filled. All construction pipes, culverts, or similar structures with a diameter of 4 inches or greater that are stored at a construction site for one or more overnight periods shall be thoroughly inspected for kit foxes before the they are subsequently buried, capped, or otherwise used or moved. If a kit fox is discovered inside a pipe, that section of pipe shall not be moved until the USFWS has been consulted. If necessary, and under the direct supervision of the qualified biologist, the pipe may be moved once to remove it from the path of construction activity.

All food related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in a closed container and removed at least once a week from a construction or project site. No firearms shall be allowed on the project site. To prevent harassment, mortality of kit foxes, or destruction of dens by dogs or cats, no pets should be permitted on project sites. Use of rodenticides and herbicides in project areas should be restricted (See Appendix J, Preconstruction Surveys and Ground Disturbance and Construction Recommendations).

MM 4.10-8 **(Text is refined to reflect current best practices)**

If wetland and other waters of the U.S. cannot be avoided, the District shall hire a qualified wetland specialist to conduct a wetland delineation for all features that may be affected by project improvements.

MM 4.10-9 **(Text is refined to reflect current best practices)**

The applicant shall comply with USACE "no net loss" policy for mitigation of wetlands under the jurisdiction of the USACE. The applicant shall apply for a Section 404 permit, a Section 401 permit, and a 1602 Streambed Alteration Agreement if these areas are jurisdictional and would be affected by the project. If required, apply for a Section 404 permit from the USACE after verification of the wetland delineation by the USACE. Any waters of the U.S. that would be lost or disturbed shall be replaced or rehabilitated on a "no net loss" basis in accordance with the USACE mitigation guidelines. On-site creation of wetland habitat is preferred to off-site mitigation. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by methods agreeable to the USACE. Obtain a Section 401 water quality waiver of certification from the RWQCB and implement a mitigation plan that includes one of the following:

(a) Completion of an on-site Mitigation and Monitoring Plan that includes on-site creation/preservation of the wetlands.
(b) Acquisition of credits from an approved mitigation bank.

MM 4.10-10 Avoidance of Vernal Pool Habitat. (**not applicable to proposed project)**

MM 4.10-11 Create Replacement Habitat. (**not applicable to proposed project)**

MM 4.10-12 Avoidance. (**not applicable to proposed project)**

MM 4.10-13 Minimization and Off-site Conservation. (**not applicable to proposed project)**

MM 4.10-18 Avoidance. Avoid nesting season construction. Grading and other construction activities shall be scheduled to avoid the nesting season to the extent feasible. The nesting season for most raptors in the CSP area extends from February through August.

MM 4.10-19 Preconstruction/Predisturbance Surveys. If it is not possible to schedule demolition and construction between August and February, then preconstruction surveys for nesting raptors will be conducted by a qualified ornithologist or wildlife biologist to ensure that no raptor nests will be disturbed during project implementation. This survey will be conducted no more than 14 days prior to the initiation of construction activities during the early part of the breeding season (February through April) and no more than 30 days prior to the initiation of these activities during the late part of

the breeding season (May through August). During this survey, the biologist will inspect all trees and other suitable nesting habitat in and immediately adjacent to the impact areas for raptor nests. If an active raptor nest is found close enough to the construction area to be disturbed by these activities, the ornithologist, in consultation with CDFG, will determine tile extent of a construction-free buffer zone to be established around the nest.

MM 4.10-20 Pre-season Surveys and Site Modification

A winter survey should be conducted in December or January of the year in which construction or other disturbance is proposed for a particular parcel. If the parcel contains suitable habitat, protocol level surveys should be conducted in January to locate and flag occupied burrows. A 50-meter buffer shall be created and marked around any occupied burrows and the remainder of the site shall be disced to discourage occupancy. A qualified ornithologist shall apply to CDFW to evict burrowing owls occupying the site. Once authorization has been received and owls have been evicted, the burrows shall be filled in and the area disced. No owls will be evicted during the breeding season, nor will any area within 250 feet of such a flagged, occupied burrow be disced or otherwise disturbed during the breeding season.

MM 4.10-21 Preconstruction Surveys and Buffer Zones

If site construction or other disturbance does not commence within 30 days of MM 4.10-20, then preconstruction surveys shall be conducted in conformance with federal and State regulations protecting raptors against direct "take." Pre-construction surveys for burrowing owls should be conducted by a qualified ornithologist prior to any soil-altering activity or economic development occurring on-site. The preconstruction surveys should be conducted no more than 30 days prior to the start of site grading, regardless of the time of year in which grading occurs. If breeding owls are located on or immediately adjacent to the site, a construction-free buffer zone around the active burrow must be established as determined by the ornithologist in consultation with CDFW. No activities, including grading or other construction work or eviction of owls, would proceed that may disturb breeding owls. If owls are resident during the nonbreeding season, a qualified ornithologist, upon authorization by CDFW, could evict the owls to avoid the loss of any individuals.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to biological resources. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
V. Cultural Resources					
Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	Less than significant with mitigation	No	No	No	MM 4.9-1
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less than significant with mitigation	No	No	No	MM 4.9-1
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than significant with mitigation	No	No	No	MM 4.9-1
d) Disturb any human remains, including those interred outside of formal cemeteries?	Less than significant with mitigation	No	No	No	MM 4.9-1

Discussion

Cultural resource impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis. The SNCSP Final EIR identified one potential impact utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance. The SNCSP Final EIR impact discussion collectively addresses the above environmental issue areas as described below.

a) Summary of SNCSP Final EIR

The SNCSP Final EIR determined that the impact of loss of cultural and historical resources as a result of the planned growth under the CSP was potentially significant before mitigation. While much of the land within the CSP area had already been disturbed, and previous studies had not revealed significant cultural resources in the project area, not all of the area had been

surveyed and thus the SNCSP Final EIR determined there was a high potential for undiscovered cultural resources beneath the plow zone in the San Luis Creek area.

Goal 2, Objective 2, of the General Plan Open Space and Conservation Element states that "Significant archaeological and cultural resources are recognized and mapped." The City concluded that implementation of SNCSP Final EIR MM 4.9-1 would satisfy the objectives of the Open Space and Conservation Element, and would reduce the impact of loss of cultural and historical resources to less than significant.

Proposed Project Analysis and Conclusion

In accordance with MM 4.9-1, FCS archaeologists completed a cultural resources assessment (contained in Appendix C), which included a records search to confirm whether any record of resources had been filed since approval of the SNCSP Final EIR in 2004 with respect to the Master Plan Study Area. The records search identified 30 survey reports, six previously recorded resources (prehistoric or historic-era archaeological sites, historic resources, or historic properties) and five bridges that occur in the Master Plan Study Area. Two of these resources are eligible for the National Register of Historic Places and California Register of Historical Resources, and one is unevaluated.

Three Native American tribal members, including Ms. Tara Estes-Harter, Tribal Historic Preservation Officer (THPO) of the Picayune Rancheria of Chukchansi Indians, requested that they be advised of archaeological surveys and ground-disturbing activities. Ms. Estes-Harter also requested consultation under CEQA Assembly Bill 52 (AB 52). A record of the correspondence with Native American tribal representatives and/or organizations and historical societies is included in Appendix C.

FCS archaeologists also performed a pedestrian survey of the currently proposed alignments for water and sewer line extensions to evaluate them for evidence of cultural resources, consistent with MM 4.9-1. Surveys were completed on May 10 and August 4, 2018, for all areas of ground disturbance proposed in previously undisturbed locations, as depicted in Exhibit 3. The surveys did not identify any additional historic or prehistoric cultural resources within the areas of proposed ground disturbance. Based on the negative results of the records search, literature review, pedestrian survey, and Tribal consultation, FCS considers the potential for the implementation of the proposed project to have a significant adverse effect on undiscovered cultural resources to be moderate to low. Archaeological monitoring is not recommended at this time.

The proposed project does not anticipate any significant cultural resources changes beyond those analyzed in the SNCSP Final EIR. Pursuant to applicable federal and state law and regulations, if buried cultural materials are encountered during ground-disturbing activity associated with the implementation of the proposed project, all work in the vicinity of the discovery must halt until a qualified archaeologist makes an assessment of the find and follows the proper protocol for the specific type of cultural material. Therefore, the proposed project would not introduce new

significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to cultural resources. Further, no new mitigation measures or alternatives are required. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
VI. Geology, Soils, and Mineral Resources					
Would the project:					
a) Expose people or structures to potential substantial adverse effects, including risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	No impact	No	No	No	N/A
ii) Strong seismic ground shaking?	Less than significant with mitigation	No	No	No	MM 4.7-1
iii) Seismic-related ground failure, including liquefaction?	Less than significant with mitigation	No	No	No	MM 4.7-1
iv) Landslides?	Less than significant with mitigation	No	No	No	MM 4.7-1
b) Result in substantial soil erosion or the loss of topsoil?	Less than significant with mitigation	No	No	No	MM 4.7-2 MM 4.7-3 MM 4.7-4
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site	Less than significant with mitigation	No	No	No	MM 4.7-1

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
landslide, lateral spreading, subsidence, liquefaction or collapse?					
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Less than significant with mitigation	No	No	No	MM 4.7-1
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	No impact	No	No	No	N/A

Discussion

Geology, soils, and mineral resources impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis. The SNCSP Final EIR identified four potential impacts utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance. SNCSP Final EIR impacts and related geology, soils, and mineral resources impact discussions collectively address the above environmental issue areas as described below.

a–e) Summary of SNCSP Final EIR

The SNCSP Final EIR determined that buildout could result in potential impacts related to seismic and geologic hazards. Implementation of MM 4.7-1 and the preparation of site-specific soils and geologic assessment prior to approval of subsequent development permits would reduce potential impacts to less than significant.

The SNCSP Final EIR determined that the impact of increased soil erosion is potentially significant. Implementation of MM 4.7-2, MM 4.7-3, and MM 4.7-4 would reduce this impact to less than significant.

The SNCSP Final EIR determined that the impact of potential loss of mineral resources is less than significant, and no mitigation measures would be required.

Proposed Project Analysis and Conclusion

Implementation of the proposed project would primarily consist of improvements to existing water and wastewater infrastructure systems and facilities. The proposed project would also include installation of new water transmission lines and new well facilities. As such, the proposed project would not introduce any new sensitive receptors to seismic hazards, or subject residents to soil conditions susceptible to seismic hazards, or increase soil erosion, or result in potential loss of mineral resources. In addition, the proposed project must comply with the requirements of MM 4.7-1 through MM 4.7-4 of the Final EIR, which would reduce potential impacts to geology, soils, and mineral resources to less than significant. Therefore, the proposed project would not introduce new significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

Geology, soils, and mineral resources mitigation measures from the SNCSP Final EIR applicable to the proposed project are listed below:

MM 4.7-1 The County shall update the disaster plans for Santa Nella consistent with the County Multi-Hazard Emergency Plan as growth proceeds in the Santa Nella community.

MM 4.7-2 Prior to approval of final facilities design (improvement plans), the Santa Nella County Water District and Merced County Department of Public Works shall review plans for drainage and storm water runoff control systems and their component facilities to ensure that these systems and facilities are non-erosive in design.

MM 4.7-3 Upon completion of construction, applicants for subsequent projects shall revegetate all exposed soil surfaces within 30 days, or as otherwise approved by the County Department of Public Works, to minimize the potential topsoil erosion and maximize aesthetic appeal.

MM 4.7-4 The project applicant shall comply with Central Valley Regional Water Quality Control Board requirements for temporary erosion control measures during project construction and shall implement Best Management Practices (BMPs) in new developments to minimize the transport of sediments and other pollutants into local waterways.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to geology, soils, and mineral resources. Further, no new mitigation measures or alternatives are required. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
VII. Hazards and Hazardous Materials					
Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant	No	No	No	N/A
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than significant	No	No	No	N/A
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than significant	No	No	No	N/A
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than significant	No	No	No	N/A

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	N/A	No	No	No	N/A
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	N/A	No	No	No	N/A
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	N/A	No	No	No	N/A
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	N/A	No	No	No	N/A

Discussion

Public health impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis. The SNCSP Final EIR identified two potential impacts utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance. SNCSP Final EIR public health impact discussions collectively address the above environmental issue areas as described below.

a–h) Summary of SNCSP Final EIR

The SNCSP Final EIR determined that build out of the SNCSP could expose future residents to risks associated with inundation from San Luis Reservoir and Los Banos Reservoir (if dam failure were to occur). The SNCSP Final EIR also identified a potential risk associated with aqueduct and canal hazards. The SNCSP Final EIR included MM 4.11-1 through MM 4.11-3 requiring updating of emergency plans, provision of public safety information, construction of protective fencing, and provision of warning signage. MM 4.11-4 requires fair share contributions from future development to support the implementation of MM 4.11-1 through MM 4.11-3.

Proposed Project Analysis and Conclusion

Implementation of the proposed project would primarily consist of improvements to existing water and wastewater infrastructure systems and facilities. The proposed project would also include installation of new water transmission lines and new well facilities. As such, the proposed project would not introduce any new sensitive receptors to potential exposure to hazardous materials, potential airport impacts, or conflict with an adopted emergency response plan. Furthermore, the proposed project site is located within urban and agricultural environments, and is not located near wildlands and would not result in exposure of persons or property to increased risk of wildfire. MM 4.11-1 through MM 4.11-4 have been implemented by the County as part of subsequent development projects that have been approved since 2000. Therefore, the proposed project would not introduce new significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to public health. Further, no new mitigation measures or alternatives are required. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Significant Severe Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
VIII. Hydrology and Water Quality					
Would the project:					
a) Violate any water quality standards or waste discharge requirements?	Less than significant with mitigation	No	No	No	MM 4.6-1 MM 4.6-2 MM 4.6-3 MM 4.6-4
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)?	Less than significant	No	No	No	N/A
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 which would result in substantial erosion or siltation on- or off-site?	Less than significant with mitigation	No	No	No	MM 4.6-1 MM 4.6-2

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Significant Severe Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
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?	Less than significant with mitigation	No	No	No	MM 4.6-1 MM 4.6-2
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less than significant with mitigation	No	No	No	MM 4.6-1 MM 4.6-2
f) Otherwise substantially degrade water quality?	Less than significant with mitigation	No	No	No	MM 4.6-3 MM 4.6-4 MM 4.6-5
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?	No impact	No	No	No	N/A
h) Place within a 100-year flood hazard structures which would impede or redirect flood flows?	No impact	No	No	No	N/A

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Significant Severe Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
i) Expose people or structures to significant risk or loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Less than significant with mitigation	No	No	No	MM 4.11-1
j) Inundation of by seiche, tsunami, or mudflow?	No impact	No	No	No	N/A

Discussion

Hydrology and water quality impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis. The SNCSP Final EIR identified 3 potential impacts utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance. SNCSP Final EIR impact discussions collectively address the above environmental issue areas as described below.

a–j) Summary of SNCSP Final EIR

The SNCSP Final EIR concluded that buildout of the SNCSP could result in a potentially significant impact related to increased surface runoff due to altered drainage patterns. Implementation of MM 4.6-1 and MM 4.6-2 would reduce this impact to less than significant.

The SNCSP Final EIR concluded that buildout of the SNCSP could result in a potentially significant impact related increases in pollutants and contaminants in surface and groundwater. Implementation of MM 4.6-3, MM 4.6-4, and MM 4.6-5 would reduce this impact to less than significant.

The SNCSP Final EIR concluded that buildout of the SNCSP could result in a potentially significant impact related to water treatment and distribution facilities. The EIR noted that the existing water distribution system that services residential and commercial land uses is insufficient to serve the demands of the proposed SNCSP. The EIR concluded that implementation of the Master Plans would reduce potential impacts to less than significant.

The SNCSP Final EIR also concluded that build out of the SNCSP could expose future residents to risks associated with inundation from San Luis Reservoir and Los Banos

Reservoir (if dam failure were to occur). The SNCSP Final EIR included MM 4.11-1 to require updating of the County's Emergency Response Plan would reduce the impact to less than significant.

Proposed Project Analysis and Conclusion

Implementation of the proposed project would primarily consist of improvements to existing water and wastewater infrastructure systems and facilities. The proposed project would also include installation of new water transmission lines and new well facilities, pursuant to standard County best practices for construction to control stormwater runoff. Once operational, the proposed project would operate in compliance with regulations covering existing District facilities.

The proposed project does not include the construction of new housing and so would not introduce new sensitive receptors to flood hazards. Implementation of the proposed project would provide expanded capacity to handle runoff water. Furthermore, the proposed project must comply with the requirements of MM 4.6-1 through MM 4.6-5, and MM 4.11-1 of the Final EIR, which would ensure the proposed project would not alter existing drainage patterns, degrade water quality, or violate any water quality standards or waste discharge requirements. Therefore, the proposed project would not introduce new significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

Hydrology and water quality mitigation measures from the SNCSP Final EIR applicable to the proposed project are listed below:

MM 4.6.1 Prior to approval of any tentative subdivision map within the Specific Plan area, the project applicants shall identify adequate areas for retention of stormwater, and a stormwater retention plan shall be accepted by the Merced County Department of Public Works in compliance with the Merced County Storm Drainage Design Manual.

MM 4.6.2 The project applicants shall obtain a National Pollutant Discharge Elimination Permit (NPDES) prior to the initiation of any development activities.

MM 4.6-3 The project applicant shall comply with Regional Water Quality Control Board requirements for temporary erosion control measures during project construction and shall implement permanent Best Management Practices (BMPs) in new developments to minimize discharge of urban pollutants into local waterways.

MM 4.6-4 An appropriate monitoring program shall be prepared and implemented by the County Environmental Health Department in coordination with the Santa Nella County Water District to ensure that groundwater water quality is maintained in

compliance with all applicable standards and to monitor any accumulation of pollutants in the top soil lenses in all retention basins.

MM 4.6.5 The monitoring program shall also address and monitor the overall performance of the system so that appropriate future programs or adjustments in system design may be implemented, if necessary. Basin performance shall be monitored by the County Public Works Department in conjunction with the Santa Nella County Water District.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to hydrology and water quality. Further, no new mitigation measures or alternatives are required. Therefore, the modified project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
IX. Land Use and Relevant Planning					
Would the project:					
a) Physically divide an established community?	Less than significant	No	No	No	N/A
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Significant and unavoidable	No	No	No	MM 4.1-1 MM 4.1-2
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	N/A	No	No	No	N/A

Discussion

Land use and relevant planning impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis. The SNCSP Final EIR identified two potential impacts utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance. SNCSP Final EIR impact discussions collectively address the above environmental issue areas as described below.

a)–c) Summary of SNCSP Final EIR

The SNCSP Final EIR determined that the proposed land used in the SUDP expansion area was inconsistent with the land use designations in the General Plan. However, implementation of MM 4.1-1, which requires identification of the benefits of the SUDP

expansion for consideration and approval by the Board of Supervisors, would reduce this impact to less than significant.

The Final EIR analysis also determined that implementation of the proposed project would result in potentially significant impacts for land use conflicts between agricultural and urban land use areas. The Final EIR concluded that impacts would remain significant and unavoidable even with implementation of MM 4.1-2, which requires provision of setbacks or vegetative breaks between rural and urban uses.

Proposed Project Analysis and Conclusion

Implementation of the proposed project would primarily consist of improvements to existing water and wastewater infrastructure systems and facilities. The proposed project would also include installation of new water transmission lines and new well facilities. As such, the proposed project would not divide land uses, nor contribute to potential conflict between agricultural and urban areas. The proposed project would not conflict with land use plans or policies established for the purpose of avoiding or mitigating an environmental effect. The project area is also not located within a habitat conservation plan area. Therefore, the proposed project would not introduce new significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to land use and relevant planning. Further, no new mitigation measures or alternatives are required. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
X. Noise					
Would the project:					
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than significant with mitigation	No	No	No	MM 4.4-1
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Less than significant	No	No	No	N/A
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Less than significant with mitigation	No	No	No	MM 4.4-2
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Less than significant	No	No	No	N/A
e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Less than significant	No	No	No	N/A

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	Less than significant	No	No	No	N/A

Discussion

Noise impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis. The SNCSP Final EIR identified three potential impacts utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance. SNCSP Final EIR impact discussions collectively address the above environmental issue areas as described below.

a–f) Summary of SNCSP Final EIR

The SNCSP Final EIR determined that the impact of temporary increases in noise levels due to construction is potentially significant. No mitigation measures are required beyond the goals and policies of the CSP. Implementation of Goal 1 and Policy 9 of the CSP would reduce this impact to less than significant.

The SNCSP Final EIR determined that construction activities associated development that could occur under implementation of the Plan could result in significant noise impacts to sensitive receptors in the project vicinity. However, the analysis concluded that implementation of the goals and policies contained in the Noise concept of the CSP would ensure that construction noise impacts would be reduced to less than significant, and no mitigation would be required.

The SNCSP Final EIR determined that development that could occur under implementation of the Master Plans could introduce new noise sensitive receptors to traffic noise levels in excess of the normally acceptable land use compatibility standards. Implementation of MM 4.4-1, which requires completion of an acoustical study and implementation of identified mitigation measures, would reduce this impact to less than significant.

The SNCSP Final EIR further determined that the long-term increase in traffic noise levels along local roadways due to increased traffic generation is potentially significant. Implementation of

MM 4.4-2, which requires completion of an acoustical study and implementation of identified mitigation measures, would reduce this impact to less than significant.

Proposed Project Analysis and Conclusion

A noise impact analysis was performed for the proposed project (contained in appendix D). As noted in the study, the Merced County Code limits noise-producing construction activities to the hours between 7:00 a.m. and 6:00 p.m. on weekdays; construction activities are not permitted at any time on weekends or on legal holidays. Similar to the analysis of the SNCSP Final EIR, the analysis determined that complying with the City's noise ordinance, which requires that construction activities be limited to the permissible hours and all construction equipment be properly muffled and maintained, would ensure that potential short-term construction noise impacts in the project vicinity would be reduced to less than significant.

At the time of preparation of this analysis, noise specifications regarding the proposed project's stationary noise sources were not available. However, noise levels produced by these noise sources are required to comply with the County's noise performance standards listed above which set acceptable limits for intrusive exterior and interior noise levels as well as criteria for identifying substantial permanent increases in ambient noise levels. In addition, based on the proposed improvement plans, the proposed project does not propose to introduce new stationary noise sources within 500 feet of any existing noise sensitive land use. Therefore, project-related stationary operational noise impacts would be less than significant.

The SNCSP included MM 4.4-1 and MM 4.4-2, which require completion of an acoustical study and implementation of identified mitigation measures. An acoustical study was completed for the proposed project in compliance with these mitigation measures. The study confirmed that adherence to the County Code would reduce impacts to less than significant. Similar to the SNCSP Final EIR, the analysis determined that implementation of the proposed project would result in a less than significant impact in regards to temporary substantial increases, vibration impacts, and airport noise impacts and no additional analysis would be required.

Mitigation Measures

None.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to noise. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Significant Severe Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
XI. Population and Housing					
Would the project:					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	Less than significant	No	No	No	N/A
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	Less than significant	No	No	No	N/A
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	Less than significant	No	No	No	N/A

Discussion

Population and Housing impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis. The SNCSP Final EIR did not identify any impacts requiring mitigation utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance. SNCSP Final EIR impact discussions collectively address the above environmental issue areas as described below.

a–c) Summary of SNCSP Final EIR

The SNCSP Final EIR determined that the impact of increasing the population of Santa Nella and altering the demographic characteristics of the community is less than significant, and no mitigation measures are necessary.

The SNCSP Final EIR determined that implementation of the SNCSP would result in a beneficial impact related to balancing the jobs and housing ratio, the impact would be less than significant, and no mitigation measures are necessary.

Proposed Project Analysis and Conclusion

Implementation of the proposed project would primarily consist of improvements to existing water and wastewater infrastructure systems and facilities. The proposed project would also include installation of new water transmission lines and new well facilities. As such, the proposed project would enable the planned future growth of the SNCSP to occur. The proposed replacement and extension of existing infrastructure would not displace any housing or people. Therefore, the proposed project would not introduce new significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to population and housing. Further, no new mitigation measures or alternatives are required. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Severe Significant Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
XII. Public Services					
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
a) Fire protection?	Less than significant with mitigation	No	No	No	MM 4.12-1 MM 4.12-2
b) Police protection?	Less than significant with mitigation	No	No	No	MM 4.12-3 MM 4.12-4
c) Schools?	Less than significant	No	No	No	MM 4.12-5 MM 4.12-6
d) Parks?	Less than significant	No	No	No	N/A
e) Other public facilities?	Less than significant	No	No	No	MM 4.12-7

Discussion

Public services and utilities impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis. The SNCSP Final EIR identified 10 potential impacts utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance. SNCSP Final EIR impact discussions collectively address the above environmental issue areas as described below.

a–e) Summary of SNCSP Final EIR

The SNCSP Final EIR determined that the impact of increased demand on fire protection and police services is significant. Implementation of MM 4.12-1 through MM 4.12-4, which requires payment of fees to support additional staffing, would reduce this impact to less than significant.

The SNCSP Final EIR determined that the impact of a substantial increase in demand on school facilities would be reduce to less than significant with implementation of MM 4.12-5 and MM 4.12-6, which requires provision of land for a new school as well as payment of standard school district fees.

The SNCSP Final EIR determined that implementation of the SNCSP would result in a less than significant impact on the demand for health care facilities.

Proposed Project Analysis and Conclusion

Implementation of the proposed project would primarily consist of improvements to existing water and wastewater infrastructure systems and facilities. The proposed project would also include installation of new water transmission lines and new well facilities. The proposed project would not result in the need for additional police, fire, or school services, and therefore MM 4.12.1 through MM 4.12-6 are not applicable to the proposed project. The proposed project would not introduce new significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to public services and utilities. Further, no new mitigation measures or alternatives are required. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Significant Severe Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
XIII. Recreation					
Would the project:					
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than significant	No	No	No	N/A
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than significant	No	No	No	N/A

Discussion

Recreation impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis. The SNCSP Final EIR identified no potential impacts utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance. SNCSP Final EIR Impact 8-8 and related recreation impact discussions collectively address the above environmental issue areas as described below.

a)-b) Summary of SNCSP Final EIR

The SNCSP Final EIR did not identify any impacts associated with recreational resources.

Proposed Project Analysis and Conclusion

Implementation of the proposed project would primarily consist of improvements to existing water and wastewater infrastructure systems and facilities. The proposed project would also include installation of new water transmission lines and new well facilities. As such, the

proposed project would not contribute to any new impacts related to parks, or other recreational facilities. Therefore, the proposed project would not introduce new significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to recreation. Further, no new mitigation measures or alternatives are required. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Significant Severe Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
XIV. Traffic and Circulation					
Would the project:					
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Less than significant	No	No	No	N/A
b) Conflict with an applicable congestion management program, including but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for the designated roads or highways?	Less than significant with mitigation	No	No	No	MM 4.2-1 through MM 4.2-38
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results	No impact	No	No	No	N/A

Environmental Issue Area	Conclusion in SNCSP Final EIR	Do the Proposed Changes Involve New or More Significant Severe Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP Final EIR Mitigation Measures
in substantial safety risks?					
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No impact	No	No	No	N/A
e) Result in inadequate emergency access?	No impact	No	No	No	N/A
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	Less than significant with mitigation	No	No	No	MM 4.2-1 through MM 4.2-38

Discussion

Traffic and circulation impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis. The SNCSP Final EIR identified potential impacts utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance. SNCSP Final EIR Impacts 4.2-1 through 4.2-38 and related to traffic and circulation impact discussions collectively address the above environmental issue areas as described below.

a)–f) Summary of SNCSP Final EIR

The SNCSP Final EIR analysis concluded that the only traffic and circulation impacts that would occur with implementation of the project were related to increased traffic on the existing roadway network, impacts to transit services, and pedestrian/bicycle safety. However, these impacts were found to be mitigated to less than significant with implementation of MM 4.2-1 through MM 4.2-38.

Proposed Project Analysis and Conclusion

Implementation of the proposed project would primarily consist of improvements to existing water and wastewater infrastructure systems and facilities. The proposed project would also include installation of new water transmission lines and new well facilities. As such, the proposed project would not contribute to any impacts related to traffic or circulation. Therefore, the proposed project would not introduce new significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to traffic and circulation. Further, no new mitigation measures or alternatives are required. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

Environmental Issue Area	Conclusion in SNCSP FRP EIR	Do the Proposed Changes Involve New or More Significant Severe Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP FRP EIR Mitigation Measures
XIV. Utilities and Service Systems					
Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Less than significant	No	No	No	N/A
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than significant	No	No	No	N/A
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than significant	No	No	No	N/A
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Less than significant	No	No	No	N/A

Environmental Issue Area	Conclusion in SNCSP FRP EIR	Do the Proposed Changes Involve New or More Significant Severe Impacts?	New Circumstances Involving New or More Severe Significant Impacts?	New Information Requiring New Analysis or Verification?	SNCSP FRP EIR Mitigation Measures
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than significant	No	No	No	N/A
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Less than significant	No	No	No	N/A
g) Comply with federal, State, and local statutes regulations related to solid waste?	Less than significant	No	No	No	N/A

Discussion

Utilities and service systems impacts associated with the proposed project would be consistent with those identified in the SNCSP Final EIR analysis. The SNCSP Final EIR identified potential impacts utilizing the above environmental issue areas from Appendix G of the CEQA Guidelines as thresholds of significance. SNCSP Final EIR utilities and service systems impact discussions collectively address the above environmental issue areas as described below.

a)–g) Summary of SNCSP FRP EIR

The SNCSP Final EIR determined that the impact of insufficient water treatment facilities and distribution systems is potentially significant. No implementation measures beyond those in the Master Plans are considered necessary. Implementation of the mitigation measures in the Master Plans would reduce this impact to less than significant.

Proposed Project Analysis and Conclusion

Implementation of the proposed project would primarily consist of improvements to existing water and wastewater infrastructure systems and facilities. The proposed project would also include installation of new water transmission lines and new well facilities, which would enhance the ability of the District to serve existing and future development.

Therefore, the proposed project would not introduce new significant environmental impacts or create more severe significant environmental impacts than those analyzed in the SNCSP Final EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying significant new effects nor is there an increase in the severity of previously identified significant effects related to traffic and circulation. Further, no new mitigation measures or alternatives are required. Therefore, the proposed project does not change or alter any of the findings of the SNCSP Final EIR and none of the conditions in CEQA Guidelines Section 15162(a) has occurred; accordingly no further environmental review is required.

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