Addendum No. 3 to the Lancaster Water Reclamation Plant 2020 Facilities Plan Final Environmental Impact Report

(SCH No. 2001021127)

Prepared for

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SECTION 1.0
INTRODUCTION

1.1 PURPOSE OF THE DOCUMENT

On June 16, 2004, the Board of Directors of County Sanitation District No. 14 of Los Angeles County (District No. 14) certified the *Lancaster Water Reclamation Plant 2020 Facilities Plan Final Environmental Impact Report* (State Clearinghouse No. 2001021127) (hereinafter referred to as the "LWRP FEIR" or "FEIR"). The District No. 14 Board approved FEIR Alternative 2, which was identified as the recommended project in the FEIR and described in the Lancaster Water Reclamation Plant 2020 Facilities Plan (LWRP Plan). The LWRP Plan and FEIR were prepared to identify the long-term wastewater treatment and effluent management facilities needed to accommodate projected wastewater flows in District No. 14 in an environmentally sound and cost-effective manner.

Among the proposed improvements to the LWRP addressed in the FEIR was the construction of 17 additional sludge (i.e., biosolids) drying beds, to add to the existing 12 drying beds for a total of 29 beds, to expand the on-site capacity for this component of the wastewater treatment process. The LWRP FEIR analyzed the environmental impacts of construction and on-site operation of these additional drying beds.

District No. 14 is now proposing the Lancaster Water Reclamation Plant Biosolids Air Drying Pad Project (herein after referred to as "LWRP Biosolids Air Drying Pad Project" or "Project") that would optimize and expand the drying capacity as previously identified in the FEIR by constructing one large drying pad that is approximately equivalent, in both size and scope, to the 17 drying beds analyzed in the EIR. The change from 17 additional drying beds to one large drying pad does not constitute a substantial change in the project as the area impacted will be similar in scope and size to the area analyzed in the FEIR. The construction of the pad will result in fewer environmental impacts as construction of the pad will not involve the previously planned three feet of excavation required for the drying beds as analyzed in the FEIR. The optimization and expansion of the drying capacity will enable District No. 20 biosolids to be added to the operation. The Project is expected to increase efficiency by potentially reducing vehicle (truck) traffic and emissions and to overall improve biosolids handling in the Antelope Valley.

Biosolids from District No. 20's Palmdale Water Reclamation Plant (PWRP) would be hauled to the LWRP facility for air drying using the same, or similar, route that is presently used to haul PWRP biosolids to the current contracted composting facility, Synagro. By reducing enhancing the drying operations at LWRP before export, this Project would decrease the overall trucking traffic in the Antelope Valley and generate a substantial cost savings for both Districts. These changes to biosolids transport were not expressly disclosed and analyzed in the LWRP FEIR and constitute the Project being analyzed for purposes of this Addendum. Therefore, this document is an Addendum to the LWRP FEIR for the portion of the project related to the Project to document and analyze the anticipated changes to the routes, number, and frequency of vehicle trips to haul and export biosolids.

Section 1.0 of this Addendum provides an introduction and the basis for the Addendum. Section 2.0 provides background information on the Los Angeles County Sanitation Districts (Sanitation Districts), District No. 14, District No. 20, and a summary of the LWRP FEIR. Section 3.0 provides a description of the existing setting and proposed Project. Section 4.0 presents an environmental analysis of the Project described in Section 3.0. Section 5.0 presents the conclusions of this Addendum No. 3. Section 6.0 identifies references of the sources cited in this

Addendum.

1.2 BASIS FOR THE ADDENDUM

This Addendum No. 3 has been prepared in accordance with the provisions of the California Environmental Quality Act (CEQA) (*California Public Resources Code* §21000 et. seq.) and the State CEQA Guidelines (Title 14, *California Code of Regulations* §15000 et. seq.).

Section 15164(b) of the State CEQA Guidelines states that "an addendum to an Environmental Impact Report (EIR) or adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent Environmental Impact Report (EIR) or negative declaration have occurred." Pursuant to Section 15162(a) of the State CEQA Guidelines, a subsequent EIR is only required when:

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

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

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

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

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

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

This Addendum analyzes the environmental impacts resulting from implementation of the Project (including impacts resulting from changes in circumstances) and identifies the difference, if any, between the impacts evaluated in the LWRP FEIR, and any impacts associated with the Project. It also reviews whether any new information of substantial importance has been identified that shows that the Project would have one or more significant effects not discussed in the previous environmental document. This Addendum also identifies all applicable Mitigation Measures (MMs) adopted as part of the LWRP FEIR applicable to the Project.

As described in detail herein, potential environmental impacts of the Project have been analyzed and the analysis confirms there are no new significant impacts resulting from the Project, nor is there any substantial increase in the severity of any previously identified environmental impacts due to the Project. The potential impacts associated with the Project would either be the same or less than the levels described and analyzed in the LWRP FEIR.

Therefore, in accordance with Section 15164 of the State CEQA Guidelines, this Addendum No. 3 to the certified *Lancaster Water Reclamation Plant 2020 Facilities Plan Final Environmental Impact Report* is the appropriate environmental review documentation for the Project.

SECTION 2.0
BACKGROUND AND SUMMARY OF FEIR

Pursuant to Section 15050 of the State CEQA Guidelines, District No. 14 is the Lead Agency for this Addendum No. 3 to the LWRP FEIR and has the authority for Project approval and approval of the accompanying environmental documentation (i.e., this Addendum). The following section provides background information on the Sanitation Districts, District No. 14, District No. 20, a summary of the LWRP FEIR and Addendum Nos. 1 and 2 to the FEIR.

2.1 LOS ANGELES COUNTY SANITATION DISTRICTS

The Sanitation Districts is a confederation of special districts that serve the wastewater and solid waste management needs of approximately 5.5 million people in Los Angeles County (County) within a service area of approximately 850 square miles. Through the operation of 11 wastewater treatment facilities, approximately 510 million gallons per day (mgd) of wastewater are treated and 165 mgd are available for reuse. Additionally, approximately 67 megawatts of electricity are created through the Sanitation Districts' wastewater and solid waste operations.

The Sanitation Districts are comprised of 24 separate and independent sanitation districts, serving all or parts of 78 cities and unincorporated areas within the County. Although each sanitation district has a separate Board of Directors – consisting of the mayor of each city served and the Chair of the County Board of Supervisors for unincorporated areas – all 24 sanitation districts work cooperatively through a single centralized administrative organization to coordinate Sanitation Districts affairs.

District No. 14 is one of the two districts that provide wastewater services in the Antelope Valley. District No. 14's wastewater is treated at the LWRP, which is located at 1865 West Avenue D, in the City of Lancaster. District No. 14 serves a large portion of the City of Lancaster as well as portions of the City of Palmdale and adjacent unincorporated areas of Los Angeles County. District No. 14 has constructed and operates a network of trunk sewers that extend throughout its service area. Lateral sewers, which collect wastewater generated at individual properties, drain to local sewers that are owned, operated, and maintained by the local jurisdictions. Local sewers in the District No. 14 service area drain to these trunk sewers, which then convey wastewater to the LWRP.

PWRP serves District No. 20, the other district in the Antelope Valley, and is located on two separate sites, with most of the facilities situated at 39300 30th Street East and the drying beds located on a parcel situated near the intersection of 40th Street East and Avenue P in an unincorporated area of Los Angeles County, adjacent to the City of Palmdale. It is noted that on October 26, 2005, the Board of Directors of District No. 20 certified the *Palmdale Water Reclamation Plant 2025 Facilities Plan Final Environmental Impact Report* (State Clearinghouse No. 2004091123) (hereinafter referred to as the "PWRP FEIR"). District Nos. 14 and 20 collectively provide wastewater treatment services for a population of over 300,000 within the cities of Palmdale and Lancaster and some unincorporated areas in the Antelope Valley. Exhibit 1 to this Addendum, Regional Location and Local Vicinity Map, illustrates the location of the District No. 14 and District No. 20 facilities.

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Regional Location and Local Vicinity

Exhibit 1

Lancaster Water Reclamation Plant Biosolids Air Drying Pad Project

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2.2 LANCASTER WATER RECLAMATION PLANT 2020 FACILITIES PLAN FINAL ENVIRONMENTAL IMPACT REPORT SUMMARY

The LWRP FEIR evaluated the environmental impacts of (1) the expansion of the LWRP's treatment capacity by constructing 26 mgd of conventional activated sludge (CAS) operated in a nitrification/denitrification mode and tertiary treatment facilities and decommissioning of the existing oxidation ponds; (2) the acquisition and/or leasing of 4,650 acres of land for agricultural operations using recycled water; and (3) the acquisition of 750 acres of land for recycled water storage reservoirs. The FEIR addressed four alternatives at equal levels of detail. Alternative 2, the recommended alternative, was approved by the District No. 14 Board. The discussion of the FEIR and environmental analysis of the Project is based on the FEIR's analysis of Alternative 2.

LWRP FEIR Findings

The LWRP FEIR assesses impacts for both construction and operational activities for full implementation of the LWRP Plan, as described in Alternative 2, and identifies mitigation measures to avoid or reduce impacts. The FEIR concluded there would be three significant and unavoidable impacts: (1) air quality impacts caused by construction emissions of nitrogen oxides and PM10 (particulate matter less than 10 microns), (2) biological resources impacts caused by the elimination of mudflat shore bird habitat on Rosamond Dry Lake, and (3) secondary effects of growth in the region. The following sections summarize the impacts and mitigation measures identified in the LWRP FEIR for construction and operation of the LWRP Plan.

Aesthetics

Storage reservoirs would change the character of existing land uses. This impact was determined to be less than significant, and no mitigation was required.

Air Quality

Construction of the treatment and storage facilities would temporarily increase emissions of nitrogen oxides and PM10 above thresholds of significance identified by the Antelope Valley Air Quality Management District (AVAQMD). This impact was concluded to be significant and unavoidable impact even after implementation of **Mitigation Measures (MMs) 4.8-1 through 4.8-4**. Construction emissions of other criteria pollutants would be less than significant with **MMs 4.8-1 through 4.8-4**. Operational emissions of criteria pollutants associated with treatment would also increase slightly, but not significantly, and agricultural operations would increase PM10 emissions in the region. This impact would be reduced to a less than significant level with implementation of **MMs 4.8-5 and 4.8-6**. Operations would generate odors; however, this impact was determined to be less than significant, and no mitigation was required.

Biological Resources

Construction activities would eliminate sensitive plant species including the alkali mariposa lily; this impact would be reduced to a less than significant level with implementation of **MMs 4.4-1 and 4.4-2**. The elimination of mudflat habitat from the curtailment of overflows would reduce habitat used by migratory birds; this impact would be reduced to a less than significant level with implementation of **MM 4.4-3**. Construction would potentially eliminate nesting areas and foraging habitat for sensitive bird species and marginal to low quality habitat for the Mohave ground squirrel; this impact would be reduced to a less than significant level with implementation of **MMs 4.4-4 through 4.4-6**. The construction of storage reservoirs and the conversion of previously undeveloped areas in the agricultural areas would potentially disturb desert tortoise; this impact

would be reduced to a less than significant level with implementation of **MMs 4.4-7 and 4.4-8**. The construction of storage reservoirs would eliminate seasonal claypan depressions and would potentially affect Mojave fringe-toed lizard habitat. The construction of storage reservoirs and the conversion of previously undeveloped areas in the agricultural areas would result in the loss of shadescale scrub habitat. The elimination of effluent-induced overflows onto Rosamond Dry Lake would cause loss of mudflat habitat. No mitigation measures were identified that would reduce the level of significant to less than significant; therefore, these impacts were determined to be significant and unavoidable.

Cultural Resources

Construction of storage reservoirs and grading of previously ungraded agriculture areas would potentially disturb archaeological and paleontological resources; these impacts would be reduced to a less than significant level with implementation of **MMs 4.12-1 through 4.12-5**. Construction activities would potentially disturb historic resources; this impact would be reduced to a less than significant level with implementation of **MMs 4.12-6**.

Chemicals, Hazardous Materials, and Energy

Operations would result in a minimal increase in chemical storage, energy consumption, and natural gas consumptions; these impacts were determined to be less than significant, and no mitigation was required.

Geology and Soils

Seismic impacts would affect the design of the proposed new facilities; this impact would be reduced to a less than significant level with implementation of **MM 4.2-1**. Construction activities and agricultural operations would increase the potential for soil erosion and application of treated effluent onto agricultural lands could increase soil salinity. These impacts would be reduced to a less than significant level with implementation of **MM 4.2-2**.

Hydrology and Water Quality

Construction activities would increase the potential for soil erosion into local drainages. This impact was concluded to be less than significant, and no mitigation was required. Placing impoundment storage reservoirs within the floodplain would increase the potential for localized flooding; this impact would be reduced to a less than significant level with implementation of **MM 4.3-1**. Effluent would potentially affect groundwater quality due to infiltration from storage reservoirs, oxidation ponds, and/or agricultural sites; this impact would be reduced to a less than significant level with implementation of **MMs 4.3-2, 4.3-3, 4.3-4a, 4.3-4b, 4.3-5, 4.3-6a, and 4.3-6b**. Over application of recycled irrigation water would potentially result in unauthorized runoff; this impact would be reduced to a less than significant level with implementation of **MM 4.3-7**. Improperly abandoned groundwater wells would potentially provide a conduit for applied effluent to reach the groundwater table; this impact would be reduced to a less than significant level with implementation of **MMs 4.3-8 and 4.3-9**. Finally, the elimination of effluent-induced overflows onto Rosamond Dry Lake would potentially adversely impact the water quality of Piute Ponds; this impact would be reduced to a less than significant level with implementation of **MMs 4.3-10 and 4.3-11**.

Land Use

Construction impacts of the project to local land uses would include the temporary disruption of the designated bike path along Sierra Highway; this impact would be reduced to a less than significant level with implementation of **MM 4.1-1**. Operational impacts to land uses would include placing facilities within a proposed Significant Ecological Area (SEA) and proposed alkali mariposa lily permanent and interim conservation areas, conversion of existing land uses to storage reservoirs and agricultural use, and the potential displacement of the Rancho Sierra Golf Course. These impacts were determined to be less than significant, and no mitigation was required.

Noise

Construction would temporarily increase noise levels in the vicinity of these activities, and operations could increase noise near the LWRP. These impacts were determined to be less than significant, and no mitigation was required.

Population, Employment, and Housing; Growth Inducement; and Environmental Justice

Construction activities would displace housing and individuals in a localized area when land is acquired for conversion to agricultural uses; this impact would be reduced to a less than significant level with implementation of **MMs 4.13-1 and 4.13-2**. The general population of the local area is not disproportionately represented by minority or low-income groups; therefore, no environmental justice impact would be expected. This impact was determined to be less than significant, and no mitigation was required. The LWRP Plan would be growth-accommodating and, as such, would allow for the secondary effects of growth to air quality, biology, cultural resources, transportation, energy, water resources, and noise. This impact was determined to be significant and unavoidable even after implementation of **MMs 4.13-3 and 4.13-4**.

Public Health

Recycled water is routinely used throughout the State of California, including irrigation of alfalfa with secondary treated effluent from wastewater treatment facilities. District No. 14 would comply with California Department of Health Services (DHS) and Regional Water Quality Control Board requirements for the use of recycled water. Operations could result in a minimal potential increased risk from exposure to recycled water; this impact would be reduced to a less than significant level with implementation of **MM 4.11-1**.

Public Services and Utilities

Operation of the project would slightly increase demand for disposal capacity for biosolids and increase recycled water use; these impacts were determined to be less than significant, and no mitigation was required.

Traffic and Circulation

Construction activities would temporarily increase traffic on roadways in the vicinity of the LWRP; this impact would be reduced to a less than significant level with implementation of **MM 4.1-1**. LWRP operations would slightly increase traffic volumes and would increase the potential for airborne insect swarms that utilize the new impoundments for breeding, which would potentially create a traffic hazard on Sierra Highway; this impact would be reduced to a less than significant level with implementation of **MM 4.5-1**. Construction of pipelines would create temporary traffic

delays and lane closures and operations may generate additional vehicle trips that would cause traffic delays. These impacts were determined to be less than significant, and no mitigation was required.

2.3 SUMMARY OF LWRP FEIR ADDENDUM NOS. 1 AND 2

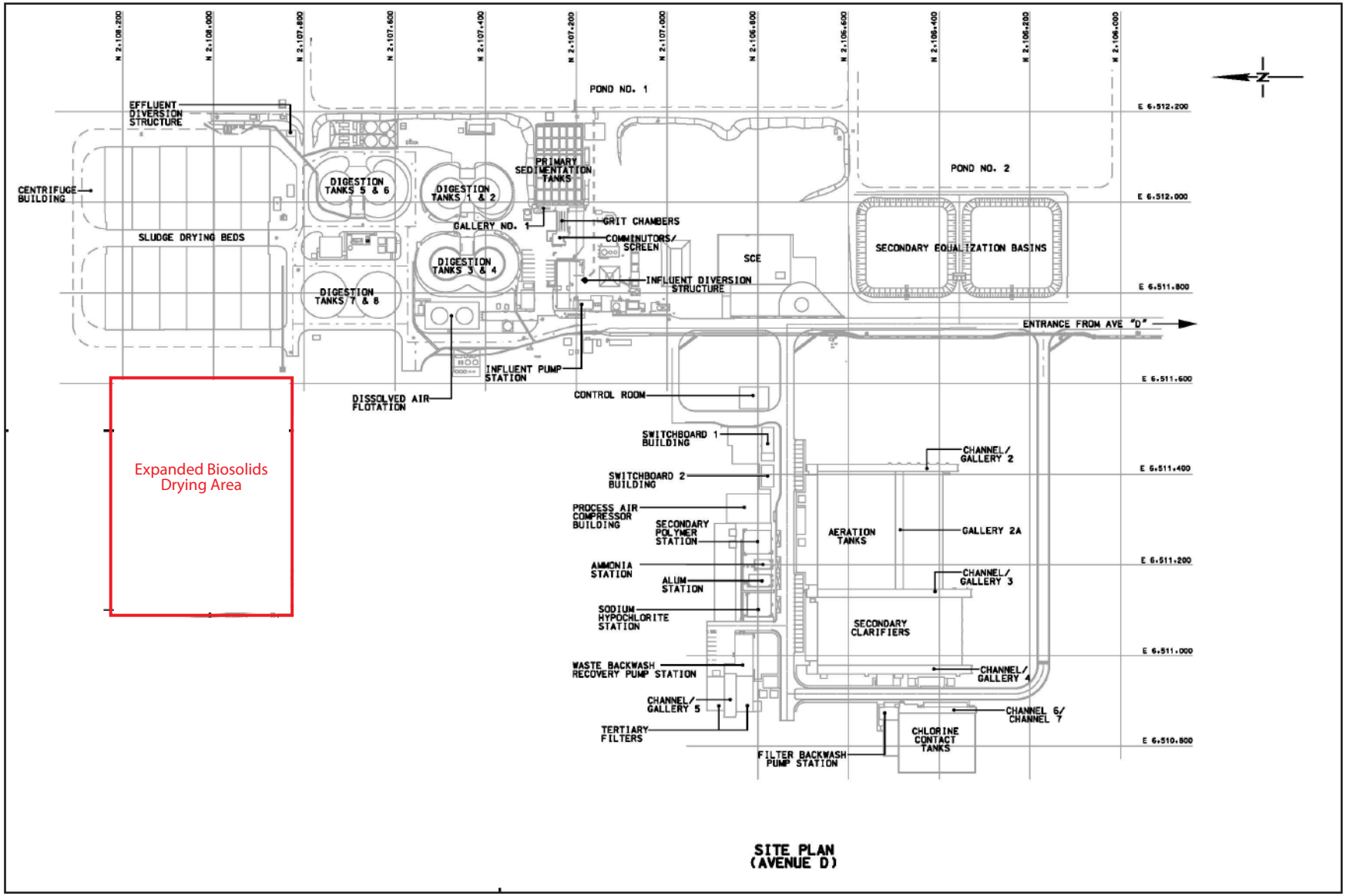
Addendum No. 1 to the Final Environmental Impact Report for the Lancaster Water Reclamation Plant 2020 Facilities Plan (hereinafter referred to as "Addendum No. 1") analyzed specific on- and off-site power improvements not identified in the LWRP FEIR. Subsequent to certification of the FEIR, Southern California Edison (SCE) proposed upgraded transmission lines between the LWRP and a new on-site substation. Specifically, the proposed changes to the project approved in the FEIR included constructing a new 66 kilovolt (kV) substation at the LWRP and replacing approximately three miles of the existing 12 kV power line and wooden poles servicing the LWRP with a 66 kV line and steel poles following the same alignment.

Additionally, based on the results of a detailed cultural resources survey of the LWRP project site after the FEIR was certified, it was concluded that prehistoric and historic cultural resources at or below the surface are unlikely to be encountered. The associated recommendation was to retain a qualified archaeologist or paleontologist and contact them is a suspected resource is found during construction activities. Based on the survey results and recommendation, two mitigation measures (**MMs 4.12-2** and **4.12-5**) and were revised to comply with the recommendations of the detailed survey while still reducing the potential impact to a less than significant level.

Addendum No. 1 determined that these changes were not a substantial change that would require major revisions to the FEIR, would not have a significant effect on the environment or a substantial increase in the severity of previously identified significant effects, and accordingly an addendum to the LWRP FEIR was prepared consistent with the provisions of CEQA.

Addendum No. 2 to the Final Environmental Impact Report for the Lancaster Water Reclamation Plant 2020 Facilities Plan (hereinafter referred to as "Addendum No. 2") analyzed specific on- and off-site power improvements not identified in the LWRP FEIR. The unanticipated power improvements were addressed by Addendum No. 1, discussed above. Subsequent to approval of Addendum No. 1 by the District No. 14 Board, SCE determined that the height of the steel poles would be 70 feet while the existing wooden poles are 45 feet to 50 feet in height. The Addendum No. 2 determined that these changes were not a substantial change that would require major revisions to the FEIR, would not have a significant effect on the environment or a substantial increase in the severity of previously identified significant effects, and accordingly an addendum to the LWRP FEIR was prepared consistent with the provisions of CEQA.

The changes to the LWRP FEIR project addressed in Addendum Nos. 1 and 2 are unrelated to the proposed Project being addressed in this Addendum No. 3.



Source: County Sanitation District No. 14 of Los Angeles County 2014

LWRP Site Plan with Location of Expanded Biosolids Drying Area

Exhibit 2

Lancaster Water Reclamation Plant Biosolids Air Drying Pad Project

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SECTION 3.0
PROJECT DESCRIPTION AND SETTING

3.1 PROJECT LOCATION AND SETTING

This Project would entail the use of existing air drying beds and a new air drying pad (similar in size to the 17 additional air drying beds analyzed in the EIR) at the LWRP facility, in a way that enhances air drying of biosolids resulting in a reduction of truck traffic due to an annual decrease in volume of material being exported. District No. 20 (PWRP) would participate in this program at the District No. 14 (LWRP) facility to further enhance the benefits of reducing vehicle (truck) traffic, related emissions, and overall improvement of biosolids handling in the Antelope Valley.

District No. 14 is one of the two districts that provide wastewater services in the Antelope Valley. District No. 14's wastewater is treated at the LWRP, located at 1865 West Avenue D, in the City of Lancaster. District No. 14 serves a large portion of the City of Lancaster as well as portions of the City of Palmdale and adjacent unincorporated areas of Los Angeles County. The other district that provides wastewater services in Antelope Valley is District No. 20, which has the PWRP, located at 39300 30th Street East, in the City of Palmdale.

The Antelope Valley is a high desert, wedge-shaped, closed basin located in the northern portion of Los Angeles County and includes the southeastern portion of Kern County and the western portion of the Mojave Desert. It is situated between the Tehachapi Mountains to the northwest and San Gabriel Mountains to the south-southwest. The principal cities in Antelope Valley are Lancaster and Palmdale and the area also includes several unincorporated communities. The Antelope Valley is regionally accessible via the State Route (SR) 14 (Antelope Valley Freeway), which passes through both the cities of Lancaster and Palmdale, and SR-138, located to the northwest of the City of Lancaster. Refer to Exhibit 1 in Section 2.0 of this Addendum for the relative location of the two treatment plants and setting of the Antelope Valley.

3.2 APPROVED BIOSOLIDS HANDLING IMPROVEMENTS

As discussed in Section 1.0, District No. 14 has constructed the additional solids processing facilities including pumps and anaerobic digesters, all of which are part of the approved LWRP Plan and all of which were evaluated under the LWRP FEIR. The expansion in biosolids handling is necessary to accommodate the increased volume of influent anticipated by District No. 14. The proposed drying pad will be constructed within the existing LWRP footprint. Exhibit 2, the LWRP Site Plan with Location of Expanded Drying Pad, depicts the location of both the existing drying beds and the expanded drying pad (in red).

Solids removed from the influent during primary treatment are treated on site. Biosolids are regulated under the Code of Federal Regulations (CFR) 40, Part 503. The regulations contain standards for management of wastewater residuals that are (1) beneficially reused for soil enhancement through land application purposes, (2) disposed of at dedicated sites or landfills, or (3) incinerated. As discussed in the LWRP FEIR, primary sludge and skimmings are anaerobically digested in the onsite digesters. Currently, biosolids generated at the LWRP are removed from the digesters, dewatered, and then placed on a total of 12 concrete-lined drying beds located in the northwest portion of the LWRP property. These drying beds have a design loading rate of 45 pounds of dry solids per square foot per year (lbs dry solids/sf/yr). Dewatered biosolids are stockpiled on site until removed for reuse and/or disposal. The LWRP is permitted to stockpile solids for up to two years. After sufficient drying time, the biosolids are stored temporarily and then placed in trucks and transported off site, a service currently under contract with Synagro, for

disposal or beneficial reuse such as processing into soil amendments. Annual biosolids monitoring reports are submitted to the United States Environmental Protection Agency (USEPA) in compliance with applicable laws and regulations.

With implementation of the LWRP Plan, all residual solids generated during the wastewater treatment process would continue to be processed at the LWRP. The LWRP Plan as revised by this addendum proposes to expand the existing biosolids management system by constructing one (1) drying pad, equivalent in size to the 17 drying beds analyzed in the FEIR. As shown on Exhibit 2, the proposed drying pad is of similar size as the existing beds. Biosolids would continue to be dried in the existing drying beds and proposed drying pad, stockpiled as appropriate, and hauled off-site for disposal and/or reuse.

The LWRP FEIR disclosed that the treatment facility expansion would result in increased emissions due to an increase in truck traffic and employee commutes to and from the LWRP. The increase in biosolids, grit, and screening production would increase daily haul trucks trips. With implementation of the LWRP Plan, biosolids would continue to be transported to the San Joaquin Composting facility in Kern County to be processed into a soil amendment and fertilizer, unless a different composing facility is selected in response to a bid process. The facility handles green material and biosolids from portions of Los Angeles and Kern counties.

Biosolids produced at the LWRP are stored on site and are hauled off site periodically based on storage availability and/or disposal equipment availability. In addition to biosolids hauling, approximately one truck every three days would be required to transport grit to the Waste Management of Lancaster landfill, which is approximately four miles away.

3.3 PROJECT DESCRIPTION

The LWRP Biosolids Air Drying Pad Project would (1) provide increased efficiency in biosolids handling by consolidating operations at one location and (2) enable biosolids produced in District Nos. 14 and 20 to be dried to a greater degree before being exported to reduce truck trips. This would involve changes in anticipated traffic patterns as part of biosolids handling compared to those disclosed and analyzed in the LWRP FEIR. These include changes in trips between the LWRP and PWRP in the Antelope Valley and between the Antelope Valley and the San Joaquin composting facility in Kern County located approximately 135 miles from the LWRP, as discussed further below.

Consistent with the LWRP Plan as analyzed in the LWRP FEIR, the LWRP will be expanding its biosolids drying capacity (from the 12 existing beds to the equivalent of approximately 29 beds). The LWRP's expanded drying capacity would also enable dewatered biosolids to be dried to a higher degree (i.e., from 18 to 40 percent solids content in the existing condition to approximately 60 percent solids content). District Nos. 14 and 20 have proposed transporting dewatered biosolids from PWRP's 30th Street facilities directly to the LWRP for drying, rather than continuing to transport to the PWRP's 40th Street facilities, to increase efficiency by using one location in the Antelope Valley for the drying operation instead of two. This was not discussed in the LWRP FEIR. Under the modified Project, an estimated 8,500 wet tons per year would be transported from PWRP to LWRP by the District No. 20. This corresponds to a rate of approximately two round trips (or four trip ends) per day by an 18-wheel semi-trailer truck. When the biosolids are ready for export for disposal and/or beneficial reuse, the hauling contractor (currently Synagro) would now be able to collect all biosolids produced from both District Nos. 14 and 20 at the LWRP instead of having to travel to both the LWRP and the PWRP. Additionally, because the exported biosolids would have a lower percentage of water – and therefore lower weight by volume – under the enhanced drying process, the hauling contractor would be able to carry more material in each truckload, which would result in fewer overall truck trips as detailed below.

Compared to the existing conditions there would be approximately four additional vehicle trips by District No. 20 between the PWRP and the LWRP, a distance of approximately 18 miles one-way. However, these trips would replace trips previously attributed to the biosolids hauling contractor under the LWRP FEIR. It is noted that the current hauler, Synagro, uses the same type of trucks to transport biosolids as District Nos. 14 and 20 use for local transportation of biosolids. While District No. 20 would be making additional trips between the PWRP and LWRP, those trips would replace trips previously made by Synagro to the PWRP. Additionally, the increased drying capacity for biosolids and the enhancements to the drying process would result in a reduction of the total number of vehicle trips necessary to export the biosolids over time. As such, the total vehicle trips and average vehicle miles traveled (VMT) to manage biosolids produced by both PWRP and LWRP, from initial production to export, would either be the same as what was evaluated under the LWRP FEIR or, in some cases, may be reduced.

While these changes in local and regional traffic patterns are minor, an addendum to the FEIR is appropriate to analyze the Project as compared to the approved LWRP Plan and confirm that no new or more significant impacts will result. The modified Project would not involve any ground disturbance, land use changes, or changes in chemical handling and use; changes in capacity or treatment processes at LWRP or PWRP; or changes in planned construction activities on- or off-site of the LWRP. There would be no construction activity associated with these planned operational changes beyond that already addressed in the LWRP FEIR. Therefore, the environmental topics analyzed in detail in this Addendum are focused on those areas that could potentially be affected by the proposed Project, as discussed further in Section 4.1, Focus of this Addendum.

3.4 DISCRETIONARY APPROVALS

Pursuant to CEQA, District No. 14 has primary discretionary authority over the approval of the Project, while District No. 20 would be a Responsible Agency. The anticipated discretionary approvals required to implement the Project includes the following:

- Approval of the LWRP Biosolids Air Drying Pad Project by both District Nos. 14 and 20;
- Approval of Addendum No. 3 to the LWRP FEIR for the LWRP Biosolids Air Drying Pad Project by District No. 14;
- Approval of Findings in support of Addendum No. 3 dated March 9, 2023, as a Lead Agency by District No. 14; and
- Approval of Findings in support of Addendum No. 3 dated March 9, 2023, as a Responsible Agency by District No. 20.

No additional permits or other discretionary actions by any agency would be required related to the changes in transportation patterns.

SECTION 4.0
ENVIRONMENTAL ANALYSIS

This document is an addendum to the CEQA document outlined in Section 2.0, Background and Summary of FEIR. By definition, an addendum to a CEQA document is intended to demonstrate that the modifications/alterations to the previously approved project will not substantially increase environmental impacts or create any new significant impacts. The following analysis is documentation of why and how this conclusion has been made for the LWRP Plant Biosolids Air Drying Pad Project, as described in Section 3.3, Project Description.

4.1 FOCUS OF THIS ADDENDUM

This section of the Addendum examines each environmental topical issue identified in Appendix G, Environmental Checklist, of the State CEQA Guidelines and determines the focus for detailed analyses in this Addendum. The topical areas identified in the *Lancaster Water Reclamation Plant 2020 Facilities Plan Final Environmental Impact Report* were used as guidance for the analyses presented in this Addendum. Table 4-1, Comparison of Topics Presented in State CEQA Guidelines and the Final Environmental Impact Report, on the following page lists the current (2022) topics presented in Appendix G of the State CEQA Guidelines and indicates either the equivalent section in the LWRP FEIR or indicates the topic was not applicable to the FEIR.

TABLE 4-1
COMPARISON OF TOPICS PRESENTED IN STATE CEQA GUIDELINES AND THE FINAL ENVIRONMENTAL IMPACT REPORT

Appendix G Environmental Checklist Topics	Equivalent LWRP FEIR Section	Requires Detailed Analysis (Yes/No)
Aesthetics	4.7, Aesthetics	No
Agriculture and Forestry Resources	N/A	N/A
Air Quality	4.8, Air Quality	**Yes**
Biological Resources	Section 4.4, Biological Resources	No
Cultural Resources	Section 4.12, Cultural Resources	No
Energy	Section 4.10, Chemicals, Hazardous Materials, and Energy	**Yes**
Geology and Soils	Section 4.2, Geology and Soils	No
Greenhouse Gas Emissions	N/A	N/A
Hazards and Hazardous Materials	Section 4.10, Chemicals, Hazardous Materials, and Energy / Section 4.11, Public Health	No
Hydrology and Water Quality	Section 4.3, Hydrology and Water Quality	No
Land Use and Planning	Section 4.1, Land Use and Recreation	No
Mineral Resources	N/A	N/A
Noise	Section 4.6, Noise	**Yes**
Population and Housing	Section 4.13, Population, Employment, and Housing; Growth Inducement; and Environmental Justice	No
Public Services	Section 4.9, Public Services and Utilities	No
Recreation	Section 4.1, Land Use and Recreation	No
Transportation	Section 4.5, Traffic and Circulation	**Yes**
Tribal Cultural Resources	N/A	N/A
Utilities and Service Systems	Section 4.9, Public Services and Utilities	No
Wildfire	N/A	N/A
N/A: Not Applicable		

Table 4-1 also identifies the environmental topics addressed in the LWRP FEIR that are the focus of this Addendum, requiring a detailed analysis based on the Project characteristics. This Addendum No. 3 is therefore focused on those environmental topics that the minor changes in traffic patterns may affect. As shown in Table 4-1 below, the environmental topics addressed in the FEIR considered to require detailed analysis to ensure that no new or more significant impacts would occur include:

- Air Quality (refer to Section 4.2.2 below);
- Chemicals, Hazardous Materials, and Energy (refer to Section 4.2.3 below);
- Noise (refer to Section 4.2.4 below); and
- Traffic and Circulation (refer to Section 4.2.5 below).

For all other topics addressed in the FEIR, there would be no possibility for the significance findings of the LWRP FEIR to be affected solely through implementation of the proposed Project. These topics and an explanation for why there would be no change in impact finding are listed below:

- Aesthetics – There would be no construction or other activity associated with the Project that would change the visual setting of the area in any way that could have a substantial adverse effect on the Antelope Valley's character.
- Biological Resources – There would be no ground disturbance associated with the Project and all biosolids transport and handling would occur on existing, paved roads and on existing facilities at the LWRP and PWRP.
- Cultural Resources – There would be no ground disturbance associated with the Project and all biosolids transport and handling would occur on existing, paved roads and on existing facilities at the LWRP and PWRP.
- Geology and Soils – The Project related solely to minor changes in traffic related to enhanced biosolids handling and, as such, would not affect the existing geologic or seismic conditions in the Antelope Valley.
- Hydrology and Water Quality – The Project related solely to minor changes in traffic related to enhanced biosolids handling and, as such, would not affect the existing hydrology or water quality in the Antelope Valley.
- Land Use – There would be no construction activity or other activity associated with the Project that would alter existing land uses or affect land use planning in the cities of Lancaster or Palmdale or unincorporated areas.
- Population, Employment, and Housing; Growth Inducement; and Environmental Justice – There would be no change in population, employment, or housing because of the Project. As noted above, the FEIR determined that the general population of the local area is not disproportionately represented by minority or low-income groups. As such, the Project would not result in an environmental justice impact.
- Public Health – The Project related solely to minor changes in traffic related to enhanced biosolids handling. The amount of waste being handled and the content of the waste would not change. As such, the Project would not affect public health in the Antelope Valley.
- Public Services and Utilities – The Project related solely to minor changes in traffic related to enhanced biosolids handling and, as such, would not affect the existing demand or use of public services and utilities in the Antelope Valley.

4.2 DETAILED ANALYSES

For each section, brief summaries of the findings of the LWRP FEIR are provided. This comparative analysis provides District No. 14 with the factual basis for determining if any changes in the Project, any changes in circumstances, or any new information since the FEIR was certified require additional environmental review or preparation of a subsequent or supplemental EIR.

4.2.1 AIR QUALITY

Summary of Previous Environmental Analysis

As set forth in the LWRP FEIR, construction of the treatment and storage facilities would temporarily increase emissions of nitrogen oxides and PM10 above thresholds of significance

identified by the AVAQMD. This impact was concluded to be a significant and unavoidable impact after implementation of **Mitigation Measures (MMs) 4.8-1 through 4.8-4**. Construction emissions of other criteria pollutants would be a less than significant impact with **MMs 4.8-1 through 4.8-4**. Operational emissions of criteria pollutants associated with treatment would also increase slightly, but not significantly, and agricultural operations would increase PM10 emissions in the region. This impact would be reduced to a less than significant level with implementation of **MMs 4.8-5 and 4.8-6**. Operations would generate odors; this impact was determined to be less than significant, and no mitigation was required.

Project Environmental Review

The LWRP Plan would result in a significant impact related to air quality if it would:

a) Conflict with or obstruct the implementation of the applicable air quality plan.

b) Violate any air quality standards or contributes substantially to an existing or projected air quality violation.

c) Expose sensitive receptors to substantial pollutant concentrations.

d) Create objectionable odors affecting a substantial number of people.

e) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under any applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for O3 precursors).

a) Conflict with or obstruct implementation of the applicable air quality plan?

No Substantial Change from Previous Analysis. As discussed above, the vehicle trips and vehicle miles traveled (VMT) would be similar to the existing conditions or reduced. The biosolids produced at PWRP would travel essentially the same number of miles to arrive at the disposal facility, albeit with a new, intermediate destination at LWRP. This period of drying at LWRP would result in biosolids with a reduced weight per volume so fewer total trips for export of biosolids would be required. The LRWP FEIR anticipated there would be an estimated five-fold increase in both projected biosolids production and transport. Therefore, there would be similar or reduced mobile source emissions related to vehicle trips required to manage biosolids from District Nos. 14 and 20 compared to the existing conditions and to anticipated conditions with buildout of the LWRP Plan. Accordingly, implementation of the Project would not result in new or more significant impacts related to consistency with the air quality plan, violation of any air quality standard, exposing sensitive receptors to substantial pollutant concentrations, or a cumulatively considerable increase in any criteria pollutant. Implementation of **MM 4.8-6** would apply to the Project.

The potential for odor generation would not be substantively increased as the amount of biosolids being dried at LWRP is limited by the amount of space. The full expansion of drying beds from 12 to 29 beds, and operational effects of this expansion, were addressed in the LWRP FEIR. The LWRP FEIR states that no sensitive receptors exist downwind of the proposed LWRP treatment facilities and storage reservoirs and the LWRP averages one complaint per year. Implementation of the Project would not result in a new or more significant impact related to creating objectionable odors affecting a substantial number of people.

Applicable Mitigation Measures

MM 4.8-6 Service vehicles shall be maintained in proper tune to minimize exhaust emissions.

Conclusion

The Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. In regard to Section 15162 of the State CEQA Guidelines, the Project (1) would not propose substantial changes; (2) would not have circumstantial changes when the Project is undertaken; (3) would bring about no new information of substantial importance that would (a) create new significant impacts, (b) increase the severity of previously examined effects, or (c) determine that mitigation measures or alternatives previously found not to be feasible would, in fact, be feasible; or (4) introduce mitigation measures that are considerably different from those analyzed in the previous documents. For these reasons, no major revisions to the air quality analysis provided in the LWRP FEIR are required.

4.2.2 CHEMICALS, HAZARDOUS MATERIALS, AND ENERGY

Note the following focuses on the energy component of the LWRP FEIR's Section 4.10, Chemicals, Hazardous Materials, and Energy. Implementation of the modified Project would not change the planned handling of chemicals, including hazardous materials; therefore, the following analysis focuses on energy use.

Summary of Previous Environmental Review

As set forth in the LWRP FEIR, operations related to buildout of the LWRP Plan would result in a minimal increase in chemical storage, energy consumption, and natural gas consumptions. These impacts were determined to be less than significant, and no mitigation was required.

Project Environmental Review

The LWRP Plan would result in a significant impact related to energy resources if it would:

a) Result in the use of large amounts of electricity or natural gas in a wasteful manner; or if the amount of electricity or natural gas to be used required the construction of new energy facilities.

No Substantial Change from Previous Analysis. As discussed above for air quality in Section 4.2.1, there would be similar or reduced vehicle trips and VMT required to manage biosolids from District Nos. 14 and 20 compared to the existing conditions and to anticipated conditions with buildout of the LWRP Plan. Accordingly, there would be no increase in the amount of energy resources, in the form of fuel, used with implementation of the Project. On the contrary, the Project is expected to result in more efficient biosolids handling, including related vehicle trips and fuel energy use. Implementation of the Project would not result in a new or more significant impact related to the use of large amounts of electricity or natural gas in a wasteful manner, or if the amount of electricity or natural gas to be used required construction of new energy facilities.

Applicable Mitigation Measures

There are no applicable mitigation measures related to energy resources.

Conclusion

The Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. In regard to Section 15162 of the State CEQA Guidelines, the Project (1) would not propose substantial changes; (2) would not have circumstantial changes when the Project is undertaken; (3) would bring about no new information of substantial importance that would (a) create new significant impacts, (b) increase the severity of previously examined effects, or (c) determine that mitigation measures or alternatives previously found not to be feasible would, in fact, be feasible; or (4) introduce mitigation measures that are considerably different from those analyzed in the previous documents. For these reasons, no major revisions to the chemicals, hazardous materials, and energy analysis provided in the LWRP FEIR are required.

4.2.3 NOISE

Summary of Previous Environmental Review

Construction would temporarily increase noise levels in the vicinity of these activities, and operations could increase noise near the LWRP. These impacts were determined to be less than significant, and no mitigation was required.

Project Environmental Review

The LWRP Plan would result in a significant impact if it would:

a) Expose persons to or generate noise levels in excess of standards established in the local noise ordinance, or the applicable standards of other agencies.

b) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

c) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

No Substantial Change from Previous Analysis. As discussed previously, the Project would involve the Sanitation Districts transporting dewatered biosolids from PWRP's 30th Street facilities directly to the LWRP for drying, rather than continuing to transport to the PWRP's 40th Street facilities. It is anticipated that approximately two round trips (or four trip ends) per day by an 18-wheel semi-trailer truck would be made by the Sanitation Districts. While the total number of vehicle trips to handle biosolids from PWRP would not increase, as discussed previously, there would be new daily trips by the Sanitation Districts between the PWRP's 30th Street facilities and the LWRP. These trips would not happen without the Project and, as such, the noise receptors along the routes between the 30th Street facilities and the LWRP were not considered in the LWRP FEIR. The location of this trip segment, under the Project, rather than the number of trips is germane to the noise analysis.

Because of the logarithmic nature of sound waves, a doubling of traffic volumes is required to increase traffic noise levels by 3 A-weight decibels (dBA). 3 dBA is also the lowest change in noise levels considered to be perceptible to human hearing outdoor environments. Accordingly, the addition of a single vehicle or two vehicle trips at a time by a semi-trailer truck on local roads between the PWRP and LWRP would not result in an audible change in traffic noise generation as one to two additional vehicles is far less than a doubling of existing traffic volumes. Therefore, implementation of the Project would not result in new or more significant impacts related to

exposure of persons to or generation of noise levels in excess of standards, a substantial permanent increase in the ambient noise levels, or a substantial temporary or periodic increase in ambient noise levels.

Applicable Mitigation Measures

There are no applicable mitigation measures related to noise.

Conclusion

The Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. In regard to Section 15162 of the State CEQA Guidelines, the Project (1) would not propose substantial changes; (2) would not have circumstantial changes when the Project is undertaken; (3) would bring about no new information of substantial importance that would (a) create new significant impacts, (b) increase the severity of previously examined effects, or (c) determine that mitigation measures or alternatives previously found not to be feasible would, in fact, be feasible; or (4) introduce mitigation measures that are considerably different from those analyzed in the previous documents. For these reasons, no major revisions to the noise analysis provided in the LWRP FEIR are required.

4.2.4 TRAFFIC AND CIRCULATION

Summary of Previous Environmental Review

As set forth in the LWRP FEIR, construction activities would temporarily increase traffic on roadways in the vicinity of the LWRP; this impact would be reduced to a less than significant level with implementation of **MM 4.1-1**. LWRP operations would slightly increase traffic volumes. Implementation of the LWRP Plan was also determined to increase the potential for airborne insect swarms that utilize the new impoundments for breeding, which could create a traffic hazard on Sierra Highway; this impact would be reduced to a less than significant level with implementation of **MM 4.5-1**. Construction of pipelines would create temporary traffic delays and lane closures and operations may generate additional vehicle trips that would cause traffic delays. These impacts were determined to be less than significant, and no mitigation was required.

Project Environmental Review

The LWRP Plan would result in a significant impact related to traffic and circulation if it would:

a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system.

b) Cause circulation patterns associated with the project to create unsafe traffic operation.

c) Cause potential traffic safety hazards to pedestrian and bicyclists.

d) Generate a demand for parking that would not be accommodated by the proposed on site supply of parking spaces.

No Substantial Change from Previous Analysis. As discussed in Section 3.0 of this Addendum, the total vehicle trips and average VMT to manage biosolids produced by both PWRP

and LWRP, from initial production to export, would be similar to the existing conditions or reduced. Notably, the increased drying of the biosolids reduces the total number of vehicle trips necessary to export the biosolids resulting from the same amount of wastewater over time.

The LWRP FEIR states that by the year 2020 (i.e., buildout of the LWRP Plan), approximately 10 employees will be necessary to operate the facility, increasing the number of employee daily trips to and from the LWRP from 10 to 20; and service and monitoring trips would increase to 60 per day. This included an estimated three truck round trips per week of biosolids disposal (i.e., export by Synagro or another contractor). Based on the proximity of the LWRP entrance to State Route (SR) 14, the small number of additional trips, and the flexibility of arrival times, the impact of the LWRP Plan was concluded to be less than significant. The addition of an estimated 2 round trips per day to the estimated 60 to 70 daily trips related to LWRP operations on local roads and highways would not trigger a new or more significant impact. Furthermore, the total trips for biosolids exported from the Antelope Valley to the composting facility would be similar to or reduced from the current number of trips and trips previously estimated in the LWRP FEIR because of a combination of the enhanced drying processes at the LWRP, efficiency of all air drying occurring at one location (i.e., the LWRP), and the lower weight by volume of dried biosolids that will enable more material to be exported in each truckload. Refer to Section 3.3, Project Description, of this Addendum for further details. Therefore, implementation of the Project would not result in new or more significant impacts related to: (1) an increase in traffic which is substantial in relation to existing traffic load and capacity of the street system, (2) circulation patterns associated with the Project that create unsafe traffic operation, (3) potential traffic safety hazards to pedestrians and bicyclists, or (4) generating a demand for parking that would not be accommodated.

Applicable Mitigation Measures

There are no applicable mitigation measures related to traffic and circulation.

Conclusion

The Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. In regard to Section 15162 of the State CEQA Guidelines, the Project (1) would not propose substantial changes; (2) would not have circumstantial changes when the Project is undertaken; (3) would bring about no new information of substantial importance that would (a) create new significant impacts, (b) increase the severity of previously examined effects, or (c) determine that mitigation measures or alternatives previously found not to be feasible would, in fact, be feasible; or (4) introduce mitigation measures that are considerably different from those analyzed in the previous documents. For these reasons, no major revisions to the traffic and circulation analysis provided in the LWRP FEIR are required.

SECTION 5.0
CONCLUSIONS

Based on the analysis provided in this Addendum, the record demonstrates sufficient evidence to determine that (1) the Project does not represent a substantial change from the previously Approved Project evaluated in *Lancaster Water Reclamation Plant 2020 Facilities Plan Final Environmental Impact Report* (State Clearinghouse No. 2001021127); (2) no substantial changes have occurred with respect to the circumstances under which the Project is undertaken; and (3) the modifications to the Project have not introduced new information of substantial importance which was not known and could not have been known at the time the project was certified as complete. The Project would not have any new or substantially more severe impacts than what was evaluated in *Lancaster Water Reclamation Plant 2020 Facilities Plan Final Environmental Impact Report* (State Clearinghouse No. 2001021127). No new Mitigation Measures are recommended in addition to those adopted at the time the project was approved that would further reduce project impacts. Therefore, none of the conditions described in Section 15162(a) requiring the preparation of a subsequent or supplemental EIR has occurred (refer to Section 1.2 of this document). Accordingly, the *Lancaster Water Reclamation Plant 2020 Facilities Plan Final Environmental Impact Report* (State Clearinghouse No. 2001021127) and this Addendum No. 3, provides adequate documentation pursuant to the CEQA for the LWRP Biosolids Air Drying Pad Project.

Signature	Date
Printed Name	Title

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SECTION 6.0
REFERENCES

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