



City of
**Santa
Monica**

Addendum No. 2 to the
Olympic Well Field Restoration and
Arcadia Water Treatment Plant Expansion Project
Mitigated Negative Declaration

April 2022

City of Santa Monica
Public Works Department
1685 Main Street
Santa Monica, California 90401

Table of Contents

SECTION	PAGE NO.
Acronyms and Abbreviations.....	iii
1 Introduction	1
2 CEQA Requirements.....	1
3 Project Description.....	3
3.1 Description of Approved Project	3
3.2 Description of the Modified Project.....	4
3.2.1 Olympic Well Field Restoration	4
3.2.2 Arcadia WTP Expansion	5
4 Impact Analysis	5
4.1 Aesthetics	6
4.2 Agriculture and Forestry Resources	7
4.3 Air Quality	7
4.4 Biological Resources	8
4.5 Cultural Resources	9
4.6 Energy	10
4.7 Geology and Soils	11
4.8 Greenhouse Gas Emissions.....	11
4.9 Hazards and Hazardous Materials	12
4.10 Hydrology and Water Quality.....	13
4.11 Land Use and Planning	13
4.12 Mineral Resources	14
4.13 Noise	14
4.14 Population and Housing.....	15
4.15 Public Services	15
4.16 Recreation.....	15
4.17 Transportation	16
4.18 Tribal Cultural Resources.....	17
4.19 Utilities and Service Systems.....	17
4.20 Wildfire	17
5 Conclusion	18

FIGURES

1A Project Location and Regional Vicinity (Approved Project) 19

1B Project Location and Regional Vicinity (Modified Project) 21

2 Well SM-11i and Well SM-12i Locations and Vicinity 23

3 Modified Project - Arcadia Water Treatment Plant Fence Replacement 25

4 City Yards Former Clay Pit/Landfill - Modified Project Well Sites 27

5 Olympic Well Field Contamination Plume - Modified Project Well Sites 29

Acronyms and Abbreviations

Acronym	Definition
AWTF	Advanced Water Treatment Facility
CEQA	California Environmental Quality Act
City	City of Santa Monica
EIR	Environmental Impact Report
Master Plan	City Yards Master Plan
MM	Mitigation Measure
MND	Mitigated Negative Declaration
WTP	Water Treatment Plant

INTENTIONALLY LEFT BLANK

1 Introduction

This document is the second addendum to the Olympic Well Field Restoration and Arcadia Water Treatment Plant Expansion Project (approved project) Mitigated Negative Declaration (MND), which was prepared by the City of Santa Monica (City) to analyze and disclose the approved project's environmental impacts pursuant to the California Environmental Quality Act (CEQA). The MND (State Clearinghouse No. 2020070129) was adopted by the Santa Monica City Council on November 24, 2020. Since adoption of the MND, the City has identified minor changes in the approved project that warrant consideration of environmental impacts pursuant to CEQA, as are addressed in this addendum. The updated project incorporating these minor changes is referred to in this addendum as the "modified project," whereas the project as described in the MND is referred to as the "approved project." In summary, the changes in the approved project addressed in this addendum include relocating the injection well proposed for Ishihara Park to a location outside the park and approximately 0.25 miles west, within the City Yards property; potentially installing an additional injection well elsewhere within the City Yards property; and replacing in place the existing fence surrounding the Arcadia Water Treatment Plant (WTP) site. Details of the modified project are further described in Section 3.2 of this addendum.

According to Section 15164(b) of the State CEQA Guidelines, an addendum to a previously adopted MND is the appropriate environmental document in instances when project changes and additions are necessary, but there would be no new or substantially more severe significant environmental effects beyond those identified in the MND. The City has determined that an addendum pursuant to Section 15164 of the CEQA Guidelines is appropriate to address the changes to the approved project.

The City Yards is an approximately 14.7-acre municipal facility that currently houses maintenance operations, equipment and materials storage, Fire Department staff training, Water Resources Department facilities, and other industrial uses. The City Yards site has been identified for redevelopment pursuant to the City Yards Master Plan (Master Plan), which was the subject of an EIR certified by the City Council in December 2018 (State Clearinghouse No. 2017111053). Because certain features of the modified project are proposed for location in the EIR's subject impact area, this addendum incorporates certain impact analysis and mitigation measures that are relevant to the modified project.

2 CEQA Requirements

Sections 15162 through 15164 of the CEQA Guidelines discuss a lead agency's responsibilities in considering project changes once an MND has been adopted.

Section 15162 of the CEQA Guidelines provides the following:

- (a) When an EIR [Environmental Impact Report] has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which will require major revisions of the 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 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 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.
- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

Section 15164 of the CEQA Guidelines provides the following:

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (c) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (d) A brief explanation of the decisions not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's finding on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

The purpose of this Addendum is to address whether proposed modifications to the Olympic Well Field Restoration and Arcadia Water Treatment Plant Expansion Project (the modified project) could result in any new significant environmental impacts which were not identified in the MND or whether previously identified significant impacts would be substantially more severe. As indicated in the analysis provided herein, the modified project would not constitute a substantial change in the project that will involve "new significant environmental effects or a substantial increase in the severity of previously identified significant effects". The environmental impacts associated with the modified project would be within the envelope of impacts analyzed in the MND and/or do not constitute a new or greater significant impact. On the basis of substantial evidence in the light of the whole record, the City has determined that an Addendum is the appropriate form of CEQA documentation to address the modified project.

3 Project Description

3.1 Description of Approved Project

The approved project is intended to diversify and enhance the sustainability of the City's local water supply. The project would maximize local water resources and reduce the City's reliance on imported water purchased from the Metropolitan Water District of Southern California. This would be accomplished by restoring the pumping capacity of the City's existing Olympic Well Field, expanding local groundwater production, conveying the extracted groundwater to a new Olympic Advanced Water Treatment Facility (AWTF) (co-located at the Arcadia WTP) via a new dedicated pipeline, and adding reverse osmosis concentrate treatment capability to the Arcadia WTP to enhance production efficiency.

The approved project described and analyzed in the MND is composed of three primary elements: (1) Olympic Well Field Restoration, (2) Olympic Pipeline, and (3) Olympic AWTF and Arcadia WTP Production Efficiency Enhancement and Expansion (Arcadia WTP Expansion). These elements as analyzed in the MND are described below. Figure 1A, Project Location and Regional Vicinity (Approved Project), of this addendum shows the project features analyzed in the MND.

- The **Olympic Well Field Restoration** component involves equipping two new injection wells (Santa Monica Well [SM]-10i and SM-11i) and two new domestic groundwater production wells (SM-8 and SM-9) in the Olympic Well Field. Lateral pipeline connections from the groundwater production wells and the injection wells to existing pipelines would be constructed within the public right-of-way. The production wells would connect to the proposed Olympic Pipeline and the injection wells would connect to existing recycled water pipelines. Additionally, a new recycled water pipeline would connect SM-11i to a planned recycled water pipeline at the Santa Monica City Yards property.
- The **Olympic Pipeline** component involves construction of a new 16-inch water transmission pipeline to transport water extracted from the Olympic Well Field in the City of Santa Monica to the new Olympic AWTF in the City of Los Angeles.
- The **Olympic AWTF and Arcadia WTP Expansion** involves two interrelated components that would be co-located at the Arcadia WTP. The proposed Olympic AWTF includes new treatment process equipment designed to treat key contaminants from the Olympic Well Field. The existing Arcadia WTP would be partially expanded to handle the additional flows from the Olympic AWTF. Additionally, this component includes a new reverse osmosis (RO) concentrate treatment technology to increase production efficiency and produce additional potable water while reducing concentrate discharges to the sewer system. The MND also anticipated broadly defined plant-wide improvements to support the treatment capacity expansion, including site work, yard piping, and electrical service modifications.

In March 2021 the City prepared the first addendum to the MND, addressing a change in circumstances under which the project would be implemented. The first addendum stated that the City was proposing to obtain financial assistance for constructing the approved project through the Local Resources Program administered by the Metropolitan Water District of Southern California, which provides financial incentives to public and private water agencies to encourage local development of water recycling, groundwater recovery, and seawater desalination. The first addendum concluded that the minor technical change in project circumstances did not affect the environmental impact analysis presented in the MND.

Changes to certain aspects of the Olympic Well Field Restoration and Arcadia WTP Expansion are the subject of this second addendum. There are no changes in the Olympic Pipeline or Olympic AWTF components of the approved project. As analyzed in the adopted MND, injection well SM-11i was originally proposed to be located in the City's Ishihara Park, north of Exposition Boulevard, with a new recycled water line to be constructed in Exposition Boulevard to connect the well to an existing pipeline to the west. These facilities are no longer planned as part of the project, and are proposed to be replaced by infrastructure described below in Section 3.2. Changes in the Arcadia WTP Expansion are limited to replacing the site's existing perimeter fence, with no changes in the infrastructure proposed as part of the approved project.

3.2 Description of the Modified Project

3.2.1 Olympic Well Field Restoration

Well SM-11i is no longer proposed to be located in Ishihara Park. Instead, the City plans to construct up to two injection wells within the City Yards property located approximately 0.25 miles west of the originally proposed well site. The two well sites under consideration are identified in this addendum as SM-11i and SM-12i and their proposed location is shown in Figure 1B, Project Location and Regional Vicinity (Modified Project), and Figure 2, Well SM-11i and Well SM-12i Locations and Vicinity. The relocation away from Ishihara Park is being considered in response to community concerns regarding park impacts expressed during the MND's CEQA public review period. The City may install and operate two wells in place of the previously planned single well at this location because injection capacity at the City Yards locations may be lower than the capacity at the Ishihara Park location.

Relocating Well SM-11i from Ishihara Park would also preclude the need to construct the underground recycled water pipeline extension within Exposition Boulevard that was previously under consideration. The alternative well locations within the City Yards property have been selected because they are adjacent to an existing underground recycled water pipeline, which is the same facility that was planned for connection by the Exposition Boulevard extension to SM-11i in the approved project. Underground pipelines required to connect the two wells in the City Yards to this recycled water line would be much shorter, as shown in Figure 2, reducing the amount of trench excavation planned for the project. The wells would otherwise be constructed by the methods described in the MND, and associated impacts would include a permanent, fenced well pad and temporary staging area.

The two alternative well locations discussed in this addendum are within the boundaries of the City's City Yards Master Plan (Master Plan), which was the subject of an EIR certified by the City Council pursuant to CEQA in December 2018 (State Clearinghouse No. 2017111053). The City Yards house existing facilities related to operation of several municipal service departments. The Master Plan proposes phased redevelopment of this City-owned property to meet the various departments' current and future operational needs. This would entail demolition and reconstruction of several buildings; reconfiguration of facilities; and implementation of utilities infrastructure improvements (new storm drain systems, hydrological features), circulation improvements, and certain landscaping, lighting, and sustainability features.

The western well site, referred to in this addendum as SM-11i, is within an area that is currently used by the City's Resource Recovery and Recycling Division. The eastern well site, referred to in this addendum as SM-12i, is within an area that is currently used by the City's Water Division. Both locations were planned for redevelopment in the Master Plan. Well SM-11i is proposed very close to the existing recycled water pipeline that

crosses the City Yards property, requiring trench installation of a short pipeline extension that is anticipated to be less than 20 feet long and all within the City Yards property. The proposed well SM-12i site is farther from the existing pipeline than SM-11i, and would require trench installation of approximately 150 feet of pipeline to connect to the existing facility. Most of this trench construction would occur within the City Yards property, but some would also occur within the adjacent Gandara Park parking lot.

3.2.2 Arcadia WTP Expansion

As part of the Arcadia WTP Expansion, the City plans to replace in place approximately 1,620 feet of the facility's existing perimeter fence, as shown in Figure 3. The existing chain-link fence is mostly 5 feet high, but is shorter in certain areas, and is typically topped with two or three spans of barbed wire. Portions of the fence feature fabric visual screens, and screening ornamental vegetation has been planted at the base of the fence in other areas. Electric gates are located at the facility's main driveways on Bundy Avenue, on the site's west side, and South Saltair Avenue, on the east side. A padlocked gate for personnel access is located at the alley bordering the site to the north. Most of the fence abuts public sidewalks or alleys, with the exception of approximately 350 feet on the site's south side, where the fence skirts the back- and side yards of two residences owned by the City and occupied by WTP operations and maintenance personnel. At these residential locations ornamental vegetation covers the fence and screens views between the WTP and the residences.

The modified project would replace approximately 1,620 feet of this existing chain-link fence with an approximately 8-foot high decorative wrought iron fence. The fence bordering the residences southwest of the plant would remain in place. A representation of the replacement fence type is shown in Figure 3¹. The existing driveway gates and personnel gates would be replaced in their current locations with iron gates of the same material and design as the rest of the fence. Existing vegetation along the parts of the fence proposed for replacement would be removed to accommodate the fence installation, and would be replaced where feasible.

Fence replacement would entail removing existing posts and fence panels and disposing of them off site, excavating a shallow, narrow trench for installation of a concrete foundation that would support the replacement fence, fastening new posts to the foundation, and hanging replacement fence panels on the posts. This work is generally consistent with the "site work" described for the approved project in the MND, but because fence replacement was not explicitly referenced in the MND and additional project details are now available, the City has elected to disclose and assess the environmental impacts of the fence replacement in this addendum.

4 Impact Analysis

This section presents a discussion of how the proposed minor changes to the project affect the analysis and impact conclusions of the environmental issues analyzed in the MND. The environmental issue areas are presented in the order in which they appear in the MND.

¹ The image shown in Figure 3 includes a photograph of a representative fence that is white in color, whereas the actual fence to be constructed as part of the modified project is anticipated to be black.

4.1 Aesthetics

No Substantial Change from Previous Analysis. Potential impacts to aesthetics are discussed in Section 3.1, Aesthetics, of the MND. The MND stated that the project site and the surrounding area of the approved project are located within highly urbanized portions of the Cities of Los Angeles and Santa Monica and do not contain open spaces or topographical features, designated scenic highways, nor do they offer scenic views. The approved SM-11i well site, located within Ishihara Park, and recycled water pipeline would be located within the City of Santa Monica. In addition, there are no scenic resources, either natural or manmade, within the viewshed of the project site. The approved project would include the construction of a pipeline that would be located underground and the installation of well sites that would be enclosed within fencing and would not be tall enough to hinder views of distant scenic vistas. Temporary visual impacts associated with construction were determined to not conflict with applicable zoning or other regulations governing scenic quality. The MND concluded the approved project would result in either less-than-significant impacts or no impacts associated with aesthetics.

The modified project would be located in the same urban visual setting as the approved project. The proposed well sites would be located within the City Yards property that currently features other public facilities and civic uses, and is planned for redevelopment that will reconfigure these uses. As analyzed in Section 4.1, Aesthetics, of the City Yards EIR, the appearance of the City Yards property and associated structures associated with the Master Plan would be visually consistent with surrounding buildings. The proposed wells would feature aboveground components that would be visible from within the City Yards and from adjacent areas, but these features would not be visually incompatible with the existing and future uses of the City Yards. Similar to the approved project, visual impacts associated with construction of the modified project would be temporary. However, the proposed pipeline extensions would be substantially smaller and primarily located within City Yards property and the parking lot for Gandara Park, thus reducing visibility of project construction from the neighboring residential area. As discussed in the MND, development of the well sites would comply with the Santa Monica Municipal Code as it relates to zoning or other regulations governing scenic quality.

By relocating the previous SM-11i well site out of Ishihara Park, the modified project would avoid adding infrastructure within the park that would be visible to park users and adjacent residences. This would also avoid the removal of existing trees within the park, as previously planned and discussed in the MND. As the modified project would avoid any visual change to Ishihara Park, the modified project would represent a beneficial change in aesthetics impacts compared to the approved project addressed in the MND.

While not explicitly identified in the MND, the proposed fence replacement would be consistent with general “site work” discussed as part of components of the Arcadia WTP component of the approved project. Replacement of an existing chain-link fence (and barbed wire topper) with a slightly taller wrought iron fence represents a marginal visual change in the context of the other components of the Arcadia WTP expansion and surrounding urban environment, and may be perceived as an improvement to aesthetic conditions by many viewers. The proposed fence replacement would be considered ancillary improvements in support of construction, installation, and operation of public utilities. As discussed in the MND, per §53091(d) of the California Government Code, building ordinances of a county or city (in this case, the City of Los Angeles) shall not apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water, wastewater, or electrical energy by a local agency. As such, the additional detail now known regarding the fence replacement would not result in new aesthetic impacts beyond those anticipated in the MND.

Similar to the approved project, the modified project would not result in significant impacts to aesthetic and scenic resources within the project site of surrounding area. In conclusion, no new or more substantially severe significant impacts associated with aesthetics would occur as a result of the modified project when compared to the MND. No new mitigation measures are required.

4.2 Agriculture and Forestry Resources

No Substantial Change from Previous Analysis. Potential impacts on agriculture and forestry resources are discussed in Section 3.2, Agriculture and Forestry Resources, of the MND. The MND concluded the approved project would result in no impacts on agriculture and forestry resources and no mitigation was identified. The City, including the entirety of the project site, is not mapped under the Farmland Mapping and Monitoring Program, and, thus, does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The approved project would be located within an urbanized area, which is not located on or surrounded by land uses that contain forest lands or timberlands. Similarly, the modified project would be located within an area that does not contain any farmland, forest lands, or timberlands and, thus, would not result in conflict with these resources.

In conclusion, no new or more substantially severe significant impacts associated with agricultural and forestry resources would occur as a result of the modified project when compared to the MND. No new mitigation measures are required.

4.3 Air Quality

No Substantial Change from Previous Analysis. Potential impacts on air quality are discussed in Section 3.3, Air Quality, of the MND. As discussed in Section 3.3 of the MND, the approved project is located within the South Coast Air Basin, which comprises Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The project site is located within the jurisdictional boundaries of the South Coast Air Quality Management District.

While the MND notes that construction of the approved project would result in a temporary addition of pollutants to the local airshed during construction, with the implementation of Mitigation Measure [MM] AQ-1 and MM-AQ-2, there would be no exceedance of South Coast Air Quality Management District construction Localized Significance Thresholds. The MND identified mitigation of potential impacts to air quality for construction activities at the Arcadia WTP and Olympic AWTF; construction of individual well sites and pipelines would not exceed construction Localized Significance Thresholds and was not assigned any mitigation in the MND. As such, the MND concluded that impacts relating to the approved project's potential to conflict with or obstruct implementation of applicable air quality plans, the cumulatively considerable net increase of criteria pollutants, exposure of sensitive receptors to substantial pollutant concentrations, and odors would be less than significant. The modified project would include similar project components to the approved project. Estimated construction emissions for the approved project are well below the daily South Coast Air Quality Management District thresholds. Minor changes in construction equipment use or duration to accommodate the modified project would not result in exceedance of these daily thresholds. The new proposed site for the SM-11i well would be located within the City Yards property, away from sensitive receptors, while the proposed SM-12i well would be located a similar distance to sensitive receptors and would require similar construction methods, phasing, and duration when compared to the approved project. SM-12i would not exceed construction Localized Significance Thresholds, similar to the other well sites analyzed in the MND. Additionally, the modified project would include a substantially smaller pipeline compared to the approved project. The proposed fence replacement at the Arcadia WTP falls under the disclosed "site work" to occur amongst various

other plant-wide improvements discussed in the MND. Therefore, this improvement does not substantially differ from what was assumed in the MND's air quality analysis for the Arcadia WTP. Approved project construction of the Arcadia WTP would result in exceedances of construction Localized Significance Thresholds. Within implementation of mitigation measures MM-AQ-1 and MM-AQ-2, impacts of the approved project would be reduced to less than significant. Construction of the modified project at Arcadia WTP would still implement MM-AQ-1 and MM-AQ-2 and impacts would remain mitigated to below Localized Significance Thresholds.

Estimated operational emissions for the approved project are well below the daily SCAQMD thresholds, and including the additional SM-12i well would not result in more emissions that would result in the exceedance of applicable operational emissions thresholds.

Estimated construction and operational emissions of the modified project are likely to be similar to what is calculated in the MND. In conclusion, no new or more substantially severe significant impacts associated with air quality would occur as a result of the modified project when compared to the MND. No new mitigation measures are required.

4.4 Biological Resources

No Substantial Change from Previous Analysis. Potential impacts to biological resources are discussed in Section 3.4, Biological Resources, of the MND. The MND stated that the installation of SM-11i would result in the removal of nine *Ficus* trees within Ishihara Park, which would result in direct impacts on nesting birds and their foraging habitat. To avoid potential direct impacts to nesting birds, the approved project would implement MM-BIO-1. As concluded in the MND, with implementation of mitigation, the approved project would result in a less-than-significant impact or no impact on other biological resources.

Construction of the modified project wells sites would be located within, and adjacent to, City Yards property, near the proposed site of the approved project. As discussed in Section 5.4.3, Biological Resources, of the City Yards EIR, the City Yards property has been developed for over 50 years and does not contain suitable habitat for native vegetation or special-status species. The City Yards EIR concluded implementing the Master Plan would not result in impacts on biological resources. Therefore, the modified project's well construction in the City Yards is not anticipated to result in direct impacts on biological resources. Installing the pipeline extension to well SM-12i would involve construction activity adjacent to trees located in the Gandara Park parking lot, which could result in temporary indirect impacts on nesting birds. The proposed fence replacement would occur within the Arcadia WTP expansion site, which does not contain sensitive biological resources, as described in the MND. Fence replacement may result in temporary indirect impacts on nesting birds, as well as potential direct impacts on nesting birds where vegetation is removed. The modified project would incorporate MM-BIO-1, which would require pre-construction nesting bird surveys during the nesting season and postponement of construction activities within a minimum of 100 feet of active nests, to reduce potential impacts to nesting birds. Further detail regarding MM-BIO-1 is included in Section 3.4 of the MND. Implementation of the modified project would avoid removal of the nine *Ficus* trees identified for removal in the MND, presenting a beneficial change in the project's impacts on biological resources compared to that identified in the MND.

In conclusion, no new or more substantially severe significant impacts associated with biological resources would occur as a result of the modified project when compared to the MND. No new mitigation measures are required.

4.5 Cultural Resources

No Substantial Change from Previous Analysis. Potential impacts to cultural resources are discussed in Section 3.5, Cultural Resources, of the MND. As discussed in Section 3.5 of the MND, search records identified 21 cultural resources within 0.5 miles of the site of the approved project. Implementation of the approved project would include ground-disturbing activities that could result in impacts to unanticipated cultural resources. The MND identified MM-CUL-1, MM-CUL-2, and MM-CUL-3 to reduce potential impacts to cultural resources. These mitigation measures would require pre-construction worker training, archaeological monitoring, and the halting of construction activities within 100 feet of a potential cultural resource find until the find can be properly evaluated. The MND concluded that with the implementation of MM-CUL-1, MM-CUL-2, and MM-CUL-3 the approved project would result in less-than-significant impacts related to historical resources, human remains, and paleontological resources. Further detail regarding MM-CUL-1, MM-CUL-2, and MM-CUL-3 is included in Section 3.5 of the MND.

A portion of the modified project would be located within and adjacent to the City Yards property, near the proposed site of the approved project. The City Yards EIR did not identify any known cultural resources within or adjacent to the City Yards property. As discussed in Section 4.4, Cultural Resources, of the City Yards EIR, the City Yards property itself is not considered eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, so implementing the modified project's proposed wells and pipe extensions would not affect known cultural resources. The City Yards EIR concluded that impacts to cultural resources would be less than significant, and no mitigation was identified for earth disturbance within the City Yards property. The proposed fence replacement is located within the Arcadia WTP expansion site, which does not contain known cultural resources. Similar to the approved project, the modified project would include ground-disturbing activities during construction that could uncover unanticipated cultural resources. Given the revised well sites relocation to the City Yards property, MM-CUL-1 through MM-CUL-3 from the MND have been revised to clarify that the measure is not required when installing wells SM-11i and SM-12i. The revised cultural mitigation measures are shown below in strikeout/underline format. Implementation of MM-CUL-1 through MM-CUL-3 as applicable for other portions of the modified project would reduce impacts to a level below significance. In conclusion, no new or more substantially severe significant impacts associated with cultural resources would occur as a result of the modified project when compared to the MND. No new mitigation measures are required.

Revised Mitigation Measures

MM-CUL-1: Prior to commencement of construction activities at the Olympic Well Field (except for well sites SM-11i and SM-12i), Olympic Pipeline, and Arcadia Water Treatment Plant, the City's construction contractor and construction personnel shall attend and complete a Workers Environmental Awareness Program (WEAP) training conducted by a qualified archaeologist. The WEAP training shall provide: (1) the types and characteristics of archaeological materials that may be identified during construction and explain the importance of and legal basis for the protection of significant cultural resources; (2) proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities, including procedures for work curtailment or redirection; and (3) protocols for the contact of the site supervisor and archaeological monitor upon discovery of a resource.

MM-CUL-2: If archaeological resources (i.e., sites, features, or artifacts) are exposed during construction activities of any components of the proposed Project at the Olympic Well Field (except for well sites SM-11i and SM-12i), Olympic Pipeline, and Arcadia Water Treatment Plant, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find and determine whether or not additional study is warranted. This work exclusion buffer may be adjusted based on the recommendation of the archaeological principal investigator. Reservation in place of any unanticipated resource should be considered the preferred approach wherever possible, and the feasibility of avoidance should be discussed with the City prior to moving forward with excavation or other potentially destructive evaluation efforts. Should it be required, temporary flagging may be installed around this resource in order to avoid any disturbances from construction equipment. Depending upon the nature of the find, the archaeological monitor in correspondence with the qualified archaeological principal investigator may simply record the find to appropriate standards (thereby addressing any data potential) and allow work to continue. If the qualified archaeological principal investigator determines the discovery to be potentially significant under California Environmental Quality Act (CEQA) or City regulations, additional efforts in conformance with requirements set forth in CEQA Section 21083.2 related to unique archeological resources shall be conducted, such avoidance of the resources, preservation in place, additional testing, and/or data, prior to allowing construction to proceed in the area of the find.

MM-CUL-3: During construction activities at the Olympic Well Field (except for well sites SM-11i and SM-12i) and Arcadia Water Treatment Plant that require earthwork below five feet or disturbance of native soils, periodic archaeological monitoring shall be conducted. The frequency and duration of the periodic monitoring shall be determined by a qualified archaeological principal investigator based on inspection of exposed subsurface soils and their observed potential to contain intact cultural deposits or material. The archaeological monitor shall have the authority to temporarily halt work to inspect areas as needed for potential cultural material or deposits. In the event that archaeological resources are exposed during construction activities for the proposed Project's MM-CUL-2 shall be followed. The archaeological monitor shall be responsible for maintaining daily monitoring logs during monitoring. Following the completion of construction, an archaeological monitoring report with the results of the cultural monitoring program shall be submitted to the City for review and approval. Once approved, the final report will be filed with the South Central Coastal Information Center.

4.6 Energy

No Substantial Change from Previous Analysis. Potential impacts to energy are discussed in Section 3.6, Energy, of the MND. As discussed in Section 3.6 of the MND, the approved project would have a less-than-significant impact associated with energy consumption. Implementation of the approved project would result in an increase in electricity, natural gas, and petroleum usage within the City. However, the total use of these resources would be a small fraction of the statewide use. The MND determined the approved project would not result in inefficient consumption of energy. The approved project's potential to conflict with a state or local plan for renewable energy or energy efficiency would be less than significant.

The modified project would include similar project components to the approved project. The modified project would include an additional well, which would increase construction-related energy consumption, and a substantially smaller pipeline, which would reduce construction-related energy consumption. Overall construction energy is anticipated to be similar to that of the approved project. With the implementation of the additional well site, operational energy of the modified project would be incrementally greater than described in the MND, but not to the extent that it would result in a significant impact pursuant to CEQA.

In conclusion, no new or more substantially severe significant impacts associated with energy consumption would occur as a result of the modified project when compared to the MND. No new mitigation measures are required.

4.7 Geology and Soils

No Substantial Change from Previous Analysis. Potential impacts to geology and soils are discussed in Section 3.7 of the MND. The MND concluded the approved project would have less-than-significant or no impacts related to earthquakes/faulting, seismic ground shaking, liquefaction, landslides, erosion, unstable geologic units/soils, expansive soils, and septic tanks. According to the Natural History Museum of Los Angeles County, the approved project is located in an area considered to have a low paleontological sensitivity.

The modified project would be located in the vicinity of the approved project and would be subject to the same geologic conditions discussed in the MND. As discussed in Section 4.5, Geology and Soils, of the City Yards EIR, some portions of the City Yards property overlie a clay pit/landfill pit. Decomposition and settlement of the landfill materials could result in structural distress. The City Yards EIR indicated compliance with requirements of the Santa Monica Building Code would include measures to minimize the risk of soil settlement, subsidence, and soil collapse. The proposed pipeline extension from the well SM-12i site to the existing recycled water pipeline would overlie the clay pit/landfill pit identified in the City Yards EIR, while the proposed well site does not overlie this area (Figure 4). Design of the modified project's wells and pipelines will incorporate recommendations from geotechnical analysis to meet Santa Monica Building Code requirements and ensure the facilities are stable. The modified project would not result in an inability to meet seismic requirements and would include applicable design features to minimize adverse effects from earthquakes and strong seismic activity. As with the approved project, the modified project would not include the use of septic tanks. Furthermore, with respect to paleontological resources, the modified project would be located within the same area as the approved project that is considered to have low paleontological sensitivity. Therefore, no new impacts to paleontological resources would occur.

In conclusion, no new or more substantially severe significant impacts associated with geology and soils would occur as a result of the modified project when compared to the MND. No new mitigation measures are required.

4.8 Greenhouse Gas Emissions

No Substantial Change from Previous Analysis. Potential impacts associated with greenhouse gas emissions are discussed in Section 3.8 of the MND. The MND determined the approved project would result in GHG emissions primarily during the construction phase, including those associated with use of off-road construction equipment, on-road haul and vendor trucks, and worker vehicles. When accounting for both construction and operational GHG emissions, the MND concluded the approved project would result in a net reduction in GHG emissions because the project would replace imported water with a local source.

Construction equipment and construction duration of the modified project would be similar to that of the approved project. Minor changes in construction equipment use or duration to accommodate the modified project would not result in a substantial increase in GHG emissions beyond what was estimated for the approved project in the MND. Similar to the approved project, net emissions generated as a result of modified project are negative with the replacement of imported water with local groundwater. As such, the modified project would result in a potential GHG emissions benefit. The modified project would not result in any new, significant sources of GHG emissions that would increase impacts from that identified in the MND.

In conclusion, no new or substantially more severe significant impacts associated with GHG emissions would occur as a result of the modified project when compared to the MND. No new mitigation measures are required.

4.9 Hazards and Hazardous Materials

No Substantial Change from Previous Analysis. Potential impacts associated with hazards and hazardous materials are discussed in Section 3.9, Hazards and Hazardous Materials, of the MND. The MND identified construction-period impacts warranting mitigation due to potential worker exposure to contaminated soil and groundwater during well installation. Several components of the approved project, including the original well SM-11i, were proposed for construction in areas of known groundwater contamination referred to as the Olympic Well Field Contamination Plume. This plume includes Cortese List sites pursuant to California Government Code Section 65962.5. MM-HAZ-1 requires preparation of a Hazardous Materials Contingency Plan to address the potential impacts related to disturbance of potentially contaminated soil, soil vapor, and/or groundwater during construction in the Olympic Well Field. Another potentially significant impact was identified due to worker exposure to hazardous levels of chromium and lead during removal of existing road surfaces, but with incorporation of mitigation measure MM-HAZ-2 impacts would be reduced to less than significant. Further details regarding MM-HAZ-1 and MM-HAZ-2 are included in Section 3.9 of the MND.

Construction of the modified project would require the same routine use, transport, storage, and disposal of potentially hazardous materials as described in the MND for the approved project. Well SM-11i of the modified project is located along the edge of the Olympic Well Field Contamination Plume depicted in the MND (see MND Figure 15). Well SM-12i is similarly located within the plume boundaries shown in the MND (Figure 5). Construction of the modified project would still require implementation of MM-HAZ-1, identified in the MND, which would apply to construction (specifically, earth-moving activities) of the modified project's wells and pipeline extensions, requiring preparation of and adherence to a Hazardous Materials Contingency Plan by project contractors. With implementation of MM-HAZ-1, impacts related to the plume would be less than significant.

As discussed in Section 4.7, Hazards and Hazardous Materials, of the City Yards EIR, the City Yards property is underlain by a former landfill, which is subject to settling. The proposed pipeline extension that would connect well SM-12i to the existing recycled water pipeline would be located within the portion of the City Yards property that is underlain by a former landfill. Mitigation measures were incorporated into the City Yards EIR to ensure impacts related to the former landfill are reduced to a less than significant level. The modified project would not impact the implementation of mitigation measures within the City Yards EIR addressing the former landfill. Similar to mitigation measures contained within the City Yards EIR, MM-HAZ-1 would be implemented for all components of the modified project, including any areas that overlie the former landfill. Construction of the modified project would comply with federal, state, and local regulations including the California Division of Occupational Safety and Health, California Accidental Release Prevention Program, the Hazardous Material Management Act, and Hazardous Waste Control Act, which provide safety and control measures for those materials handled on site, ensuring that potentially significant impacts would not occur.

As the proposed fence replacement would occur within the Arcadia WTP site, it would be subject to MM-HAZ-2, identified in the MND, which would require a hazardous material site survey. With implementation of both MM-HAZ-1 and MM-HAZ-2, impacts related to the proposed fence replacement would be less than significant.

Construction of the modified project would require the temporary closure of a portion of the Gandara Park parking lot to allow trench installation of the pipeline connection to well SM-12i. This parking lot also provides vehicle access to the City Yards. Emergency access through the City Yards would be maintained at all times. Existing conditions of the Gandara Park parking lot would be restored upon completion of construction.

In conclusion, with the implementation of MM-HAZ-1, no new or more substantially severe significant impacts associated with hazards and hazardous materials would occur as a result of the modified project when compared to the MND. No new mitigation measures are required.

4.10 Hydrology and Water Quality

No Substantial Change from Previous Analysis. Potential impacts associated with hydrology and water quality are discussed in Section 3.10 of the MND. The MND determined construction of the approved project may temporarily alter drainage patterns within the approved project sites, but these changes would be temporary and would warrant implementation of a stormwater pollution prevention plan and sediment-control best management practices to control construction pollution in compliance with the State Water Resources Control Board's Construction General Permit. As concluded in the MND, the approved project would otherwise result in less-than-significant or no impacts related to hydrology and water quality, flooding, and inundation.

Construction of the modified project would be subject to best management practices to be implemented by the project's stormwater pollution prevention plan to minimize adverse effects to water quality and erosion. Similar to the approved project, any alterations to drainage patterns during construction would be temporary. Implementation of the modified project would not conflict with water quality regulatory requirements.

In conclusion, no new or more severe impacts associated with hydrology and water quality would occur from implementation of the modified project when compared to the MND. No new mitigation measures are required.

4.11 Land Use and Planning

No Substantial Change from Previous Analysis. Section 3.11, Land Use and Planning, of the MND concluded the approved project would have a less-than-significant impact associated with land use and planning, and no mitigation is required. The MND anticipated construction of the approved project would require multiple temporary lane closures and detours, but stated the approved project would not divide an established community because operation of roadways would resume as under existing conditions upon completion of construction. The MND concluded that the proposed uses of the approved project would not conflict with land use and zoning designations because it proposed constructing public infrastructure within roads and other existing public-use areas.

The modified project would be located within City Yards property and the Arcadia WTP expansion site. The modified project would not change the overall purpose or function of the approved project. The addition of the proposed injection well sites within the City Yards Property would be consistent with the existing and planned land uses for that site as well as the general plan and zoning designations. The modified project would be located within an existing City facility proposed for redevelopment and an adjacent parking lot; therefore, this relocation of sites would not physically divide an established community.

In conclusion, no new or more substantially severe significant impacts associated with land use and planning would occur as a result of the modified project when compared to the MND. No new mitigation measures are required.

4.12 Mineral Resources

No Substantial Change from Previous Analysis. As discussed in Section 3.12, Mineral Resources, of the MND, the approved project would result in no impact to mineral resources. The locations of the approved project are identified as Mineral Resource Zone (MRZ) 1, which are defined as areas where no significant construction aggregate deposits are present, or where it is judged that little likelihood exists for their presence. The approved project would be located within a highly urbanized area of the City, which includes land uses that are not compatible with mineral extraction.

The modified project would be located within a developed area within MRZ-1, and the loss of availability of a known resource as a result of implementation of the proposed project is unlikely to occur. This is consistent with the impact conclusions of City Yards EIR. As discussed in Section 5.4.8, Mineral Resources, of the City Yards EIR, clay-mining operations occurred within the City during the early 1900s. The City Yards property was abandoned and later developed into a landfill over 50 years ago once clay was depleted from the site. No known mineral resources exist within the City Yards property today.

In conclusion, no new or more severe impacts associated with mineral resources would occur from implementation of the modified project when compared to the MND. No new mitigation measures are required.

4.13 Noise

No Substantial Change from Previous Analysis. Potential impacts associated with noise are discussed in Section 3.13, Noise, of the MND. The MND concluded that installation of the proposed recycled water pipeline of the approved project could create temporary noise at levels that would require mitigation. MM-NOI-1 was identified for this component of the project to require construction noise reduction measures that would reduce temporary noise impacts during construction to less than significant. The MND determined that vibration impacts resulting from the approved project would not be significant.

The overall scale and duration of construction for the modified project would be similar to that of the approved project, and the modified project is not anticipated to result in noise impacts beyond those stated in the MND. Under the modified project, well SM-11i would be located on the western side of the City Yards property, farther from sensitive land uses than the well SM-11i site analyzed in the MND. The proposed SM-12i well site of the modified project would be located near existing residences just east of the City Yards property, at a similar distance to residences as well SM-11i analyzed in the MND. Installation of well SM-12i and the proposed pipeline extension to well SM-12i could create temporary noise at levels anticipated to require mitigation, similar to the approved project. The proposed fence replacement at the Arcadia WTP expansion site would not generate greater levels of noise for the specified construction work analyzed in the MND (i.e., demolition and grading). The modified project would implement MM-NOI-1 to reduce potential noise impacts during construction. Since the overall design of the well sites would be the same as the approved project, the modified project would result in similar less-than-significant operational noise impacts.

In conclusion, no new or more severe impacts associated with noise would occur from implementation of the modified project when compared to the MND. No new mitigation measures are required.

4.14 Population and Housing

No Substantial Change from Previous Analysis. As discussed in Section 3.14 of the MND, the approved project would result in either less-than-significant impacts or no impacts associated with population and housing. The approved project does not propose the implementation of infrastructure that would induce substantial population growth. Furthermore, the approved project would be located within City-owned property and would not require the demolition or alteration of existing housing.

Similar to the approved project, the modified project would not result in any residential units or employment and would not induce substantial population growth in the area. Construction personnel are anticipated to come from the local areas, and thus the construction of the project would not result in growth. As with the approved project, implementation of the modified project would not result in change in water production that would induce population growth or result in substantial displacement of existing people or housing, requiring replacement housing.

In conclusion, no new or more severe impacts associated with population and housing would occur from implementation of the modified project when compared to the MND. No new mitigation measures are required.

4.15 Public Services

No Substantial Change from Previous Analysis. As discussed in Section 3.15, Public Services, of the MND, implementation of the approved project would have less-than-significant or no impact to public services. Construction would be coordinated with the Santa Monica Fire Department and Police Department and the Los Angeles Fire Department and Police Department to ensure that service providers are properly notified of the road closure and adequate rerouting is achieved.

Construction associated with the modified project would relocate the approved SM-11i well site and the extension of the existing recycled water pipeline. Unlike the approved project, implementation of the modified project would occur within City Yards property and not within Ishihara Park. Construction of the modified project would require the temporary closure of a portion of the Gandara Park parking lot to allow trench installation of the pipeline connection to well SM-12i. Existing conditions of the Gandara Park parking lot would be restored upon completion of construction. Therefore, the modified project would avoid any temporary and permanent changes to existing parks. Furthermore, implementation of the modified project would not result in any indirect or direct increase in population in an area. Therefore, the demand for public services in the area will not change.

In conclusion, no new or more severe impacts associated with public services would occur from implementation of the modified project when compared to the MND. No new mitigation measures are required.

4.16 Recreation

No Substantial Change from Previous Analysis. Potential impacts associated with recreation are discussed in Section 3.16, Recreation, of the MND. As discussed in Section 3.16 of the MND, the approved project would result in less-than-significant or no impact to recreation. The approved project does not involve a population-

generating land use that could contribute to an increase in use of existing neighborhood or regional parks or other recreational facilities. The approved project would not involve the construction of recreational facilities or require the construction of recreational facilities.

The modified project would avoid well installation within Ishihara Park. Installation of the recycled water pipeline extension to well SM-12i would require the temporary closure of some parking at Gandara Park, but this minor, temporary loss of parking would not be considered a significant impact pursuant to CEQA. Upon completion of construction, the parking lot would return to its existing conditions. As with the approved project, the modified project would not increase the use of existing parks or recreational facilities such that substantial deterioration of a facility would occur.

In conclusion, no new or more severe impacts associated with recreation would occur from implementation of the modified project when compared to the MND. No new mitigation measures are required.

4.17 Transportation

No Substantial Change from Previous Analysis. Potential impacts associated with transportation are discussed in Section 3.17, Transportation, of the MND. The MND concluded that construction of the approved project may introduce temporary hazards due to the presence and use of construction vehicles and equipment in a developed area that could present a conflict with vehicles travelling roadways in the vicinity of the site. The MND identified MM-TRAF-1 to minimize potential safety hazards during construction by requiring preparation of a Traffic Control Plan prior to construction. Further detail regarding MM-TRAF-1 is included in Section 3.17 of the MND.

The modified project would result in the temporary partial closure of the Gandara Park parking lot to construct the recycled water pipe extension to well SM-12i. Closure of the parking lot would cease upon completion of construction and would not result in inadequate emergency access. Implementation of the modified project would no longer require construction of the pipeline within Exposition Boulevard, thus reducing construction impacts related to transportation from temporary lane closure of that street. Fence replacement may require brief, temporary closure of the vehicle access driveways to the Arcadia WTP, with one of the two driveways closed at a time. This would reroute worker access and deliveries to the other driveway that would remain open. The volume of traffic affected by this closure would not create a significant impact on the circulation system, and emergency access to the driveways would remain open at all times. Similar to the approved project, construction of the modified project may introduce temporary hazards due to the presence and use of construction vehicles and equipment in a developed area, and MM-TRAF-1 would be required.

The modified project would not involve any long-term or ongoing operational traffic or circulation changes to the project site. This is consistent with the construction of the City Yards Master Plan, which anticipated short-term construction traffic, vehicular and pedestrian safety, pedestrian/bicycle access and parking, street closures, and construction parking, which would cease upon completion of construction. Therefore, no new or more severe impacts associated with transportation programs, plans, ordinances, and policies addressing the circulation system would occur.

In conclusion, no new or more severe impacts associated with transportation would occur from implementation of the modified project when compared to the MND. No new mitigation measures are required.

4.18 Tribal Cultural Resources

No Substantial Change from Previous Analysis. Potential impacts associated with tribal cultural resources are discussed in Section 3.18, Tribal Cultural Resources, of the MND. As determined in Section 3.18 of the MND, the approved project would have a less-than-significant impact or no impact associated with tribal cultural resources. As previously discussed, the approved project would have no impact on historical resources.

A portion of the modified project would be located within City Yards property, near the proposed site of the approved project. Similar to the approved project, the modified project would be located within a highly urbanized area of the City. As discussed in Section 4.4, Cultural Resources, of the City Yards EIR, no tribal cultural resources were identified within the City Yards site. In addition, previous uses of the site included a significant amount of ground-disturbing activities, so any unrecorded tribal cultural resources would likely already have been disturbed. The City Yards EIR did not identify mitigation for tribal cultural resources. As described above in Section 4.5, MM-CUL-1 through MM-CUL-3 have been revised to clarify they do not apply to installation of wells SM-11i and SM-12i. The proposed fence replacement is located within the Arcadia WTP expansion site, which does not contain known tribal cultural resources but would be subject to the same mitigation measures referenced above. Implementation of MM-CUL-1, MM-CUL-2, and MM-CUL-3, as discussed above in Section 4.5, would ensure the remaining components of the modified project's impact on any previously undiscovered tribal cultural resources would be less than significant.

In conclusion, no new or more severe impacts associated with tribal cultural resources would occur from implementation of the modified project when compared to the MND. No new mitigation measures are required.

4.19 Utilities and Service Systems

No Substantial Change from Previous Analysis. Potential impacts associated with utilities and service systems are discussed in Section 3.19, Utilities and Service Systems, of the MND. As discussed in Section 3.19 of the MND, the approved project would result in less-than-significant impacts to water, wastewater, stormwater, and solid waste facilities.

Implementation of the modified project would not require the relocation or construction of new or expanded wastewater or stormwater drainage facilities. The modified project would include the construction of two injection wells and the extension of an existing recycled water pipeline. Similar to the approved project, implementation of the modified project would improve the City's water facilities. Implementation of the project would not result in any long-term solid waste requiring waste disposal. The modified project would be served by a local landfill with sufficient capacity.

In conclusion, no new or more severe impacts associated with utilities and services would occur from implementation of the modified project when compared to the MND. No new mitigation measures are required.

4.20 Wildfire

No Substantial Change from Previous Analysis. Potential impacts associated with wildfires are discussed in Section 3.20, Wildfire, of the MND. As discussed in Section 3.20 of the MND, the proposed well locations of the

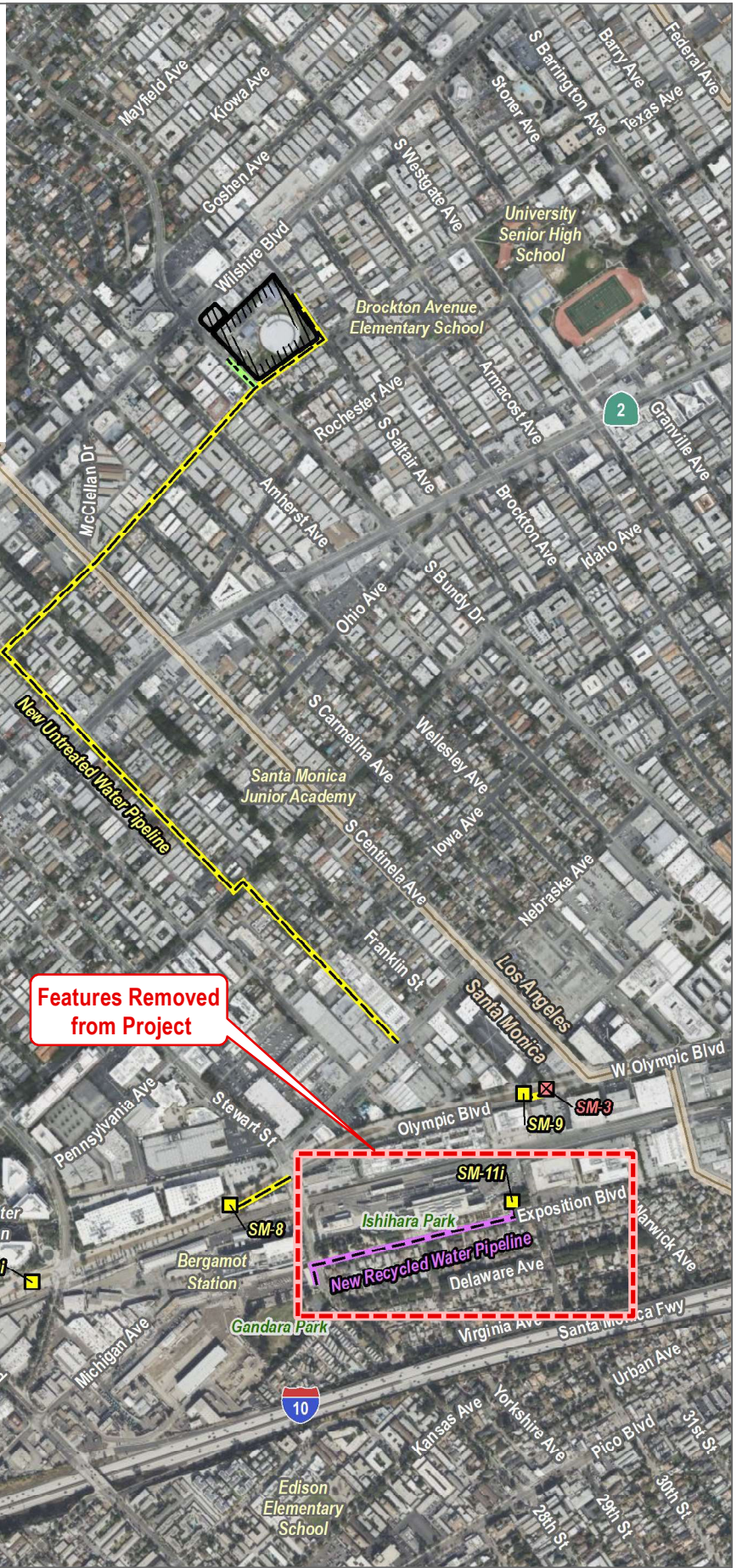
approved project are within highly urbanized areas that lack wildlands and are not within state responsibility areas or lands classified as very high fire hazard severity. Additionally, the approved project sites and the surrounding area are generally flat and lack topographical features that would exacerbate wildfire risks. As concluded in the MND, implementation of the approved project would result in no impacts associated with wildfires.

Similar to the approved project, the modified project would not be located within a very high fire hazard severity zone or on land that features topographical features that would exacerbate wildfire risks. The modified project would include the construction of two injection wells within the City Yards and the extension of an existing recycled water pipeline. The modified project would be located within highly urbanized areas that lack wildlands and are not susceptible to wildfire risks

In conclusion, no new or more severe impacts associated with wildfires would occur from implementation of the modified project when compared to the MND. No new mitigation measures are required.

5 Conclusion

This document identifies all changed circumstances related to the modified project that were not previously disclosed in the MND. As discussed in Section 4 above, none of the changes associated with the proposed modification require the preparation of a subsequent MND pursuant to CEQA Guidelines Section 15162. Therefore, this addendum constitutes the modified project's full compliance with CEQA.



SOURCE: Bing Maps 2021; Open street Map 2019

FIGURE 1A

Project Location and Regional Vicinity (Approved Project)

Olympic Well Field Restoration and Arcadia Water Treatment Plant Expansion Project



INTENTIONALLY LEFT BLANK



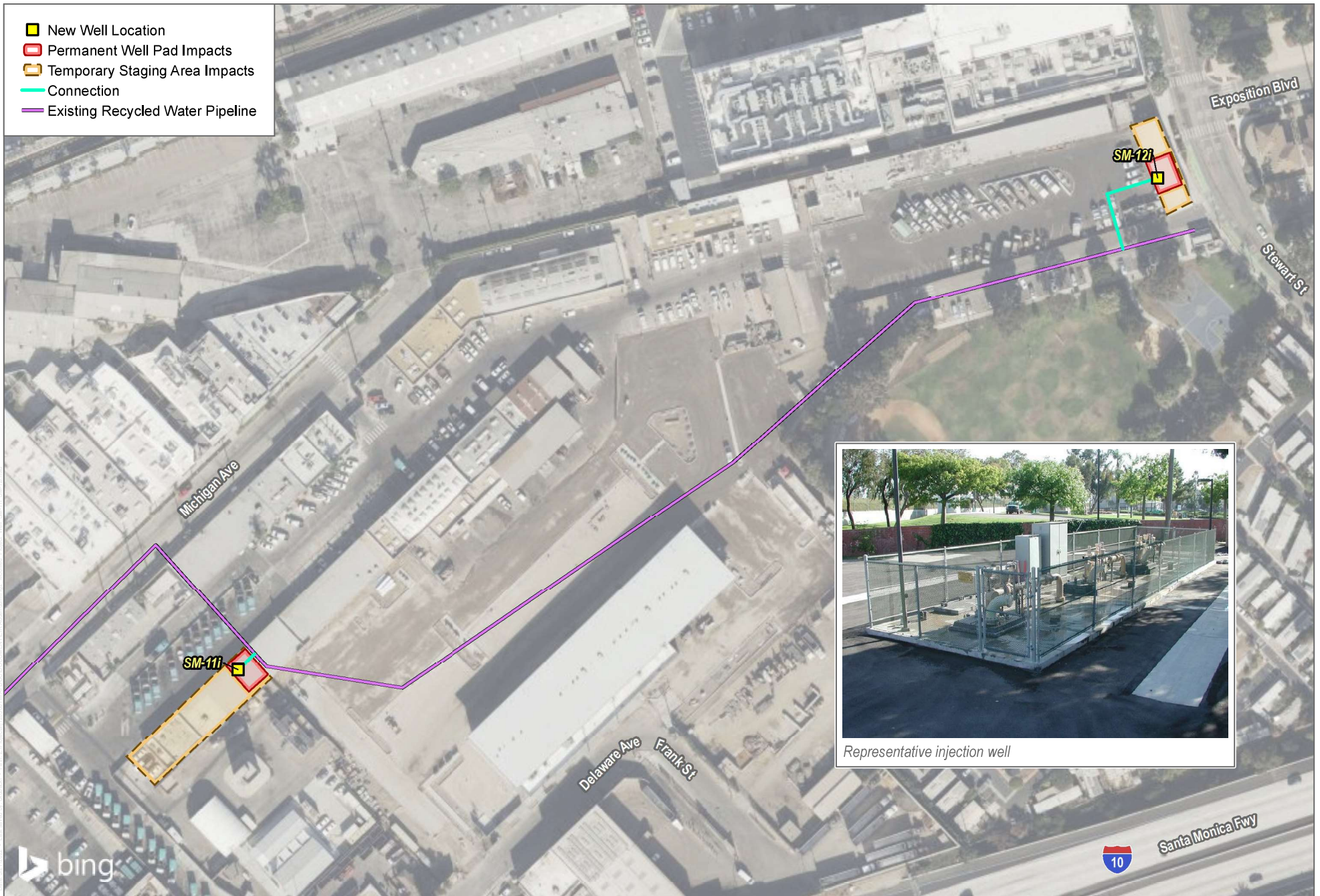
- Arcadia Water Treatment Plant
- New Well Location
- Well to be Removed
- Modified Project - Fence Replacement
- New Untreated Water Pipeline
- New Pipeline Alternative
- City Boundary

SOURCE: Bing Maps 2021; Open street Map 2019



FIGURE 1B
 Project Location and Regional Vicinity (Modified Project)
 Olympic Well Field Restoration and Arcadia Water Treatment Plant Expansion Project

INTENTIONALLY LEFT BLANK



SOURCE: Bing Maps 2021; Open street Map 2019

FIGURE 2
 Modified Project - Well SM-11i and Well SM-12i Locations and Vicinity
 Olympic Well Field Restoration and Arcadia Water Treatment Plant Expansion Project

INTENTIONALLY LEFT BLANK



SOURCE: Bing Maps 2021; Open street Map 2019



FIGURE 3

Modified Project - Arcadia Water Treatment Plant Fence Replacement

Olympic Well Field Restoration and Arcadia Water Treatment Plant Expansion Project

INTENTIONALLY LEFT BLANK



SOURCE: Bing Maps 2021; Open street Map 2019
 Engineering Services (ES) 2017



FIGURE 4
 City Yards Former Clay Pit/Landfill - Modified Project Well Sites
 Olympic Well Field Restoration and Arcadia Water Treatment Plant Expansion Project

INTENTIONALLY LEFT BLANK



SOURCE: Bing Maps 2021; Open street Map 2019
ICF 2017, 2020

DUDEK 0 80 160 Feet

FIGURE 5
Olympic Well Field Contamination Plume - Modified Project Well Sites
Olympic Well Field Restoration and Arcadia Water Treatment Plant Expansion Project

INTENTIONALLY LEFT BLANK