LiSWA Wastewater Treatment Reclamation Facility Improvements Project

CEQA Addendum to the 2013 Midwestern Placer Regional Sewer Project Environmental Impact Report and Subsequent 2017 Addendum

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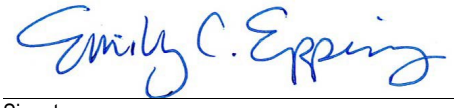
Prepared by: 

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Acronyms

%	percent
2013 EIR	2013 Midwestern Placer Regional Sewer Project Environmental Impact Report
AB 52	Assembly Bill 52
ADWF	average daily weather flow
BDR	Basis of Design Report
BMP	best management practice
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of Lincoln
CRHR	California Register of Historical Resources
DWR	Department of Water Resources
EIR	Environmental Impact Report
ft	feet
GHG	greenhouse gas
gpm	gallons per minute
GSP	Groundwater Sustainability Plan
LiSWA	The Lincoln-SMD1 Wastewater Authority
LOS	level of service
Mgal/d	Million gallons per day
NAHC	Native American Heritage Commission
NCIC	North Central Information Center
NOA	naturally occurring asbestos
NPDES	National Pollutant Discharge Elimination System
PCAPCD	Placer County Air Pollution Control District
PCCP	Placer County Conservation Plan
PCSP	Placer County Sustainability Plan
PM	particulate matter
PRC	Public Resources Code
Project	Midwestern Placer Regional Sewer Project Environmental Impact Report
proposed project improvements	LiSWA Wastewater Treatment Reclamation Facility Improvements Project
SCH	State Clearinghouse
SGMA	Sustainable Groundwater Management Act
Stantec	Stantec Consulting Services Inc.
UAIC	United Auburn Indian Community
USFWS	U.S. Fish and Wildlife Service
UV	ultraviolet
WWTRF	Wastewater Treatment and Reclamation Facility

1.0 INTRODUCTION AND OVERVIEW

The Lincoln-SMD1 Wastewater Authority (LiSWA) is upgrading its existing Wastewater Treatment and Reclamation Facility (WWTRF). The upgrade was initially analyzed by the City of Lincoln (City), now LiSWA, in the 2013 Midwestern Placer Regional Sewer Project Environmental Impact Report (2013 EIR) (State Clearinghouse No. 2012052083) (City of Lincoln 2013) pursuant to the California Environmental Quality Act (CEQA). The Midwestern Placer Regional Sewer Project (Project) underwent a few minor modifications, which were then analyzed and disclosed in an EIR Addendum in November 2017. LiSWA is now proposing additional upgrades to the LiSWA WWTRF, which will be further described here as the LiSWA WWTRF Improvements Project (proposed project improvements). The proposed project improvements add to and further modify the previously approved Project with minor upgrades; as such, the analysis in the 2013 EIR and 2017 Addendum directly applies to the proposed project improvements and provides the basis for use of this Addendum in accordance with CEQA Guidelines Section 15164.

All modifications included as part of the proposed project improvements would take place within the current footprint of the WWTRF and within areas that were previously analyzed for environmental impacts under the 2013 EIR and subsequent 2017 Addendum. The purpose of this CEQA Addendum is to cover the minor project modifications associated with the now proposed WWTRF improvements in accordance with CEQA Guidelines Section 15164.

1.1 ADDENDUM ORGANIZATION

This document is organized as follows pursuant to the requirements of the CEQA Guidelines:

- Chapter 1, Introduction and Overview, introduces the proposed project improvements, describes the organization of the Addendum, and explains the CEQA process, including the rationale and scope of the Addendum.
- Chapter 2, Project Description, describes the background of the proposed project and the existing CEQA documentation; it describes the location and details of the proposed project.
- Chapter 3, Environmental Impact Assessment, evaluates whether the proposed project improvements would result in new or substantially more severe significant environmental impacts compared with the impacts disclosed in the previous environmental documents.
- Chapter 4, List of Preparers, lists LiSWA and consultant staff who prepared the Addendum.
- Chapter 5, References, lists the documents and individuals consulted during the preparation of the Addendum.

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT

As described in CEQA Guidelines Section 15164, a lead agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described below for preparation of a subsequent EIR have occurred (CEQA Guidelines Section 15162):

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.*

Based on the analysis conducted and provided herein, this Addendum concludes that the proposed project does not warrant subsequent environmental review as required by Section 15162. The proposed project does not include substantial changes to assumed improvements to the project area, and no other circumstances have changed that would meet the criteria set forth in CEQA Guidelines Section 15162 that would require the preparation of a subsequent EIR. Therefore, a subsequent EIR is not required for the proposed project improvements, and preparation of an Addendum to the certified 2013 EIR and 2017 Addendum is appropriate pursuant to CEQA.

1.3 PREVIOUS CEQA DOCUMENTS

The City of Lincoln (City) has studied and prepared four environmental documents analyzing the environmental impacts of growth, development, and operation of its WWTRF, including one that specifically addresses planned growth within the City. This Addendum evaluates the minor changes and additions to the previously certified 2013 EIR and 2017 Addendum (the latter of which included

(1) internal mechanical additions within the existing project facilities, (2) an additional effluent storage and disposal facility in a disturbed area at the WWTRF to expand the recycled water capacity and, (3) the addition of a 10-acre solar field, also in a disturbed area at the WWTRF to increase energy efficiency). The associated CEQA documents listed below are therefore incorporated by reference here and provide the initial analysis for the proposed project improvements:

- The Wastewater Treatment and Reclamation Facility EIR (1999), State Clearinghouse (SCH) Number 1998122071
- The 2050 Lincoln General Plan Update Environmental Impact Report (2006), SCH Number 2005112003
- The Gravity Sewer and Reclamation Project Initial Study/Mitigated Negative Declaration (2012), SCH Number 2012012043
- The Midwestern Placer Regional Sewer Project EIR (2013), SCH Number 2012052083

In summary, the proposed project improvements do not increase the total capacity disclosed and analyzed in the Programmatic EIR (1999), nor do they increase the Project-specific permitted capacity disclosed in the 2013 EIR. The 2013 EIR analyzed growth in the region, acknowledging that the additional capacity will be on a first-come, first-served basis. Since Auburn is not currently participating in the Midwestern Placer Regional Sewer Project, regionally, the planned growth will likely occur within Lincoln, in accordance with their General Plan, the impacts of which were disclosed in the 2050 General Plan Update and associated General Plan EIR (2006) and the Administrative Draft Placer County Conservation Plan (February 2011). The previous CEQA documents mentioned above also cover water recycling, reclamation areas, incremental changes in flows at Auburn Ravine, and the WWTRF operation. The proposed project improvements, subject to this Addendum, add minor upgrades and improvements to the existing LiSWA WWTRF as described in Section 2.3 below.

1.4 SCOPE OF ENVIRONMENTAL REVIEW

This Addendum evaluates whether the proposed project improvements would result in new or substantially more severe significant environmental impacts compared to the impacts disclosed in the certified 2013 EIR and subsequent 2017 Addendum in accordance with the evaluation required by CEQA Guidelines Section 15162(a). The certified 2013 EIR and subsequent 2017 Addendum established that the approved Midwestern Placer Regional Sewer Project would result in less than significant or no impacts related to the following environmental issue areas:

- Land Use and Planning
- Agriculture Resources
- Recreation
- Greenhouse Gas Emissions
- Water Resources
- Mineral Resources
- Population and Housing
- Energy Resources

The certified 2013 EIR established that, with mitigation (Appendix A), the approved Midwestern Placer Regional Sewer Project would result in less-than-significant impacts related to the following environmental issue areas:

- Aesthetics
- Air Quality
- Noise and Vibration
- Geology and Soils
- Hydrology and Water Quality
- Biological Resources
- Fisheries Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Public Services and Utilities
- Transportation and Traffic
- Tribal Cultural Resources
- Wildfire

The certified 2013 EIR and subsequent 2017 Addendum established that no significant and unavoidable impacts would occur. Based on the evaluation in the following sections of this Addendum, no new significant impacts would occur as a result of the proposed project improvements. Nor would there be any substantial increase in the severity of any previously identified adverse environmental impacts. In addition, no new information of substantial importance shows that mitigation measures or alternatives that were previously found not to be feasible or that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment alternative. Therefore, none of the conditions described in Section 15162 of the CEQA Guidelines have occurred. For this reason, an Addendum is the appropriate document to comply with CEQA requirements.

2.0 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

This chapter of the Addendum describes the most recent proposed modifications to the Project by LiSWA. This Project Description is intended to provide the Project background and previous CEQA documentation that has been completed; disclose the project location; provide the specific project components to be evaluated as the whole project in this Addendum; to provide details on the modifications that were not previously covered in the existing environmental documentation described in the Project background; provide the project schedule; and document the project environmental commitments that apply to the proposed project improvements. This Project Description aims to describe the proposed project improvements as a whole, while delineating the project components not previously evaluated for clear evaluation within the environmental impact assessment in Chapter 3.0.

2.2 PROJECT LOCATION

The location of the proposed project improvements would remain unchanged from the 2013 EIR and would be located within the existing 733-acre LiSWA WWTRF property within City limits in western Placer County. All proposed project improvement activities would occur at the LiSWA WWTRF.

2.3 PROPOSED PROJECT IMPROVEMENTS

Upgrades and improvements to the LiSWA WWTRF include the following and are described herein as well as in the project's Basis of Design Report (BDR) (Stantec 2024) (Appendix B) (Figure 2-1 and Figure 2-2):

- Influent and effluent pump stations upgrades
- Installation of a 50-million-gallon-per-day (Mgal/d) grit removal basin
- Upgrades to the maturation ponds' pump station
- Filter feed pump station modifications and filter system upgrades
- Ultraviolet (UV) disinfection system upgrades
- Installation of oxidation ditch and appurtenances
- Installation of secondary clarifier and appurtenances
- Structural and electrical improvements
- Site paving and grading

Growth associated with the WWTRF is in accordance with the Lincoln 2050 General Plan Update (City of Lincoln 2008), the Placer County Conservation Plan (Placer County 2011), and was addressed in the associated Lincoln General Plan EIR (2006).

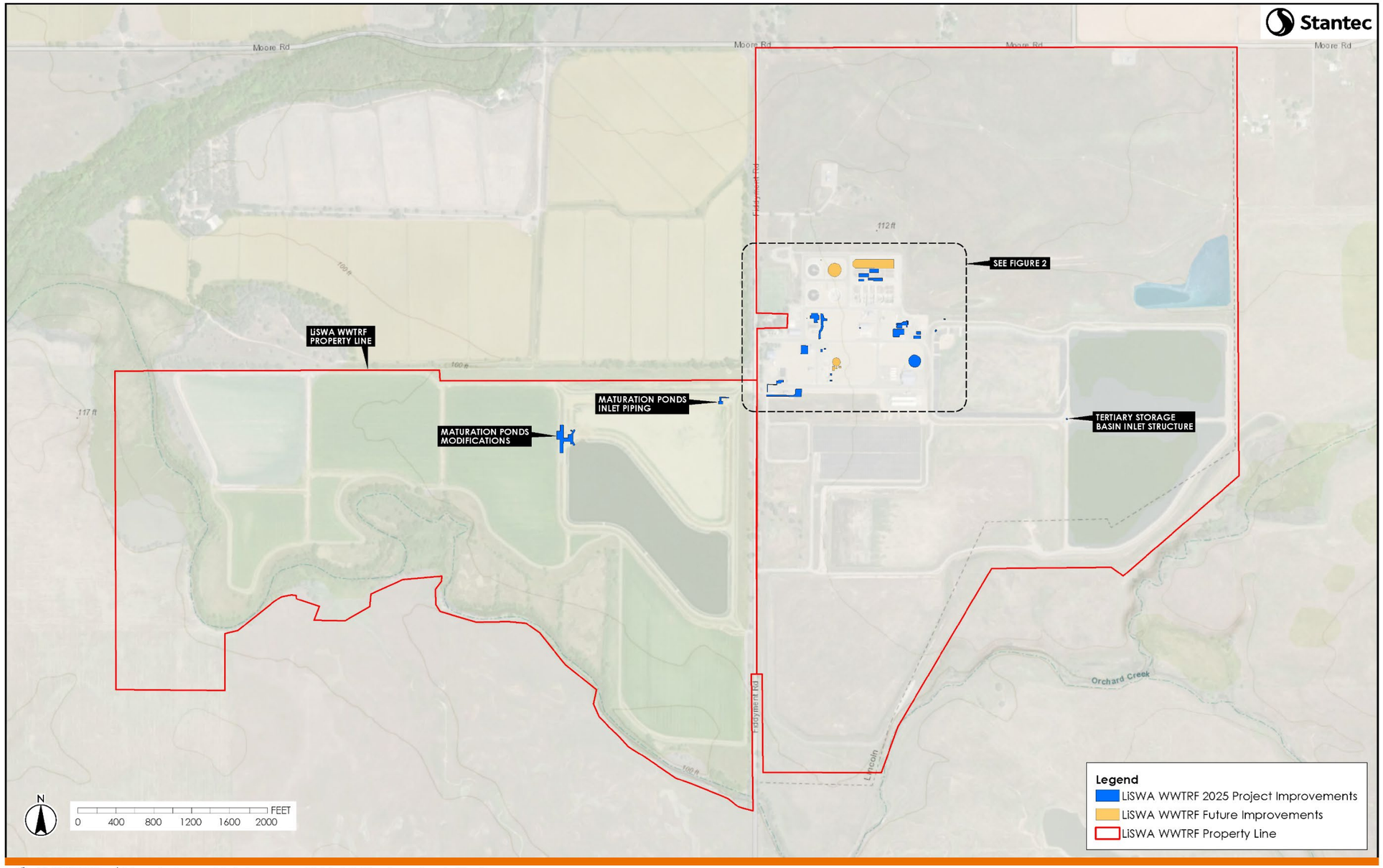

Figure 2-1: LiSWA WWTRF 2025 Improvements Project

Figure 2-2: LiSWA WWTRF 2025 Improvements Project Detail

2.3.1 Proposed Project Components

The proposed project improvement components described below are all within the existing project footprint, and increased energy demands would be offset by the added solar component. Please refer to Figure 2.1 and Figure 2.2 for project component locations.

Pump Station Upgrades

The proposed project improvements include minor modifications to both the influent and effluent pump stations. The current Influent Pump Station has space for a total of six pumps, including five large pumps, each rated at 5,500 gallon per minute (gpm), and one small pump rated at 2,250 gpm. With one large pump out of service, the reliable pump station capacity is 34.8 Mgal/d. The estimated peak hour influent flow is 49.6 Mgal/d for the proposed project, and therefore, the proposed project improvements will replace all existing pumps with six submersible pumps, each with a capacity of 6,945 gpm (10 Mgal/d), resulting in a total reliable capacity of 50 Mgal/d.

Effluent from the maturation ponds discharges through two existing maturation pond outlet structures before reaching the maturation pond level control structure, where it is then diverted to the dissolved air flotation system. When levels in the ponds are too low for gravity flow, two existing submersible pumps within the outlet structures are used to convey additional flow. These pumps each have a capacity of 4.0 Mgal/d, which is much less than the design peak monthly flow required (plus plant recycle flows) of 20.6 Mgal/d. Therefore, the proposed project improvements include three new pumps, which will result in a total of five pumps with a reliable capacity of about 19.32 Mgal/d.

Grit Removal

The proposed project improvements include the installation of one larger 50 Mgal/d grit removal basin located between the influent screens and the Parshall flow meter.

Maturation Ponds Pump Station

The maturation pond pump station has space for five mixed flow pumps, which are currently filled with five identical pumps, providing a reliable capacity (with one pump out of service) of 35.1 Mgal/d. Based on the peak hour flows, this capacity is not adequate for a target 8 Mgal/d average dry weather flow (ADWF). Therefore, all five pumps will be replaced to attain a total reliable capacity of 50.4 Mgal/d, which is adequate for the 8.0 Mgal/d ADWF plant.

Filter Feed Pump Station

The current filter feed pump station has spaces for five mixed flow pumps, but four are currently installed: two large and two small pumps, with a reliable capacity of 15.9 Mgal/d. Since peak plant influent flows are equalized in the maturation ponds, the new design peak flow for the filter feed pumps is 20.6 Mgal/d, which is equal to peak month flows plus plant recycle flow. The proposed project improvements include the replacement of two existing small pumps with two large pumps and the addition of one additional large pump, which will result in a total of five large pumps with a reliable capacity of approximately 28.5 Mgal/d.

The existing filter system was laid out to accommodate six filter cells on both sides of a common mudwell (12 cells total). Only six filter cells on one side of the mudwell exist, with each filter cell with a surface area of 384 square feet. Therefore, the reliable filter area (one cell out of service) is 1,920 square feet. Using a maximum loading rate of 5 gpm/ft^2, the maximum allowable filter influent flow is 13.8 Mgal/d. The proposed project improvements will expand the filters to 18.4 Mal/d plus 12 percent (%) in-plant recycle (20.6 Mgal/d total). In addition to filter cells, the proposed project improvements will install one rapid mixing basin and two flocculation basins.

Ultraviolet Disinfection

The current UV disinfection system is comprised of six channels, with five of them equipped to meet current disinfection targets. The system has a current design capacity of 17.5 Mgal/d based on delivering a minimum UV dose of 100 Megajoules/centimeter^2 at a design minimum UV transmittance of 70%. The proposed project improvements will upgrade and expand the UV system to 20.6 Mgal/d with the newest version of the Wedeco (a Xylem brand) TAK55 system, including an in-channel cleaning system and control equipment. All six UV channels will receive new UV equipment (banks, modules, lamps, quartz sleeves, pneumatically driven automatic wiping systems, ballast and ballast enclosures, instrumentation, junction boxes, etc.) Additionally, a new control cabinet with redundant Allen Bradley ControlLogix programmable logic controllers will be provided to improve operation reliability and flexibility.

Oxidation Ditch

An oxidation ditch is an extended aeration activated sludge process that utilizes long solids retention times to remove biodegradable organics. Tertiary filters may be required after clarification, depending on the effluent requirements. Disinfection is required, and reaeration may be necessary prior to final discharge. Flow to the oxidation ditch is aerated and mixed with return sludge from a secondary clarifier.

Secondary Clarifier

The purpose of a secondary clarifier is to allow solid particles to settle out of water using gravity. A secondary clarifier reduces turbidity, improves water quality, and makes downstream processes more efficient by removing suspended solids early in the treatment process. The result allows for solids to accumulate at the bottom of the tank and a cleaner stream with fewer suspended solids, so they may be removed and managed separately.

Structural and Electrical Improvements

Design of structures, structural components, and equipment anchorages will comply with the design codes, standards, and project references within the project's Basis of Design Report (Stantec 2024).

The LiSWA WWTRF's existing electrical distribution system was designed to facilitate planned future upgrades and, where feasible, existing switchboard and motor control center spares or space will be used to serve the added loads. Anticipated electrical improvements required for the proposed project improvements are described in the project's Basis of Design Report (Appendix B).

Site Paving, Grading, and Storm Drainage

Site grading will ensure proper stormwater drainage and capture of spills. Paved access will be provided for operational needs, with subgrade preparation to ensure stability. All buildings will be situated above the 100-year flood plain elevation, continuing the existing WWTRF concepts in the proposed project improvements. Most improvements will be implemented within the footprint of existing facilities and do not require paving or grading improvements.

Stormwater will be managed through existing conveyance systems and stored in the Stormwater Detention Basin. The system is designed to handle specified storm events and ensure controlled discharge to Orchard Creek, continuing to the existing WWTRF concepts in the proposed project. Piping will maintain flow requirements with appropriate slopes and materials. The drainage network will include cleanouts and manholes for maintenance, continuing the existing WWTRF concepts in the project.

2.3.2 Proposed Project Construction

Implementation of the proposed project improvements would follow similar methods and require similar construction equipment as disclosed in the 2003 EIR. Staging would be conducted on the existing WWTRF site, and access would be maintained through existing access roads on the WWTRF site.

2.3.3 Proposed Project Operation and Maintenance

LiSWA will continue to operate the WWTRF to minimize cost and maximize efficiency. In general, operation and maintenance activities at the LiSWA WWTRF would be similar to existing activities.

2.4 PROPOSED SCHEDULE

The current proposed project improvements schedule began with facility planning, preliminary design, funding applications, environmental documentation, and then permitting in 2017. The planning, design, and environmental compliance activities described within this CEQA Addendum are targeted to conclude with the approval of this Addendum, the permitting process, and a funding commitment by 2025 or 2026.

2.5 PROPOSED PRELIMINARY ENVIRONMENTAL COMMITMENTS/BEST MANAGEMENT PRACTICES

The 2013 EIR describes various environmental commitments and best management practices (BMPs) that were incorporated into the design of the Project. The following measures have been tailored to and incorporated into the design of the current proposed project improvements. The following commitments would be executed prior to and during the proposed project implementation and have been incorporated into the project design:

- **Environmental Commitment EC-1:** Ensure Staging Area Will Not Affect Environmental Resources. Staging areas for the proposed project improvements are within the existing footprint of the LiSWA WWTRF. Any additional staging areas shall be selected with priority given to proximity to the project to reduce traffic impacts, previously disturbed areas, or areas with little or no vegetation, areas that lacked trees, wetland, elderberry bushes, vernal pools, obvious cultural resources, or other sensitive resources. If additional, temporary staging areas are necessary, the

same screening and environmental clearance methods will be employed. Therefore, any additional staging areas will be sited to avoid environmental impacts. In the event that additional environmental impacts are identified, LiSWA will complete the appropriate environmental review process.

- **Environmental Commitment EC-2:** Vernal Pool Avoidance. Where construction is located in the vicinity of vernal pools, the Contractor will remain on the pavement with proper runoff control BMPs to avoid indirect impact to vernal pools located within 250 feet of the WWTRF. The proposed project improvements were sited based on its documented lack of vernal pools or biological resources, minimal vernal pools on adjacent properties, and the existing runoff control system to avoid potential hydrology impacts to vernal pools. If, for any reason, construction must occur within 250 feet of a vernal pool that is not hydrologically separated from the construction area (i.e., upland of construction), additional consultations with the USFWS will be required to ensure compliance with Section 7 of the Federal Endangered Species Act.

- **Environmental Commitment EC-4:** Wetland/Drainage Avoidance. The proposed project improvements will avoid impacts to all wetlands. The potential WWTRF Effluent Reclamation Field Sites are currently used for agriculture. However, the proposed project improvements do not entail construction impacts to waters of the U.S. or waters of the State. If there are design modifications or proposed work within or immediately adjacent to jurisdictional waters of the U.S. or waters of the State, the Lead Agency will obtain the appropriate United States Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife (CDFW) permits. These permits include Clean Water Act Section 401 and 404 compliance and/or a Lake and Streambed Alteration Agreement.

- **Environmental Commitment EC-8:** Construction-Related Erosion Control BMPs. The Contractor will be required to implement multiple erosion and sediment control BMPs in areas with the potential to drain to any stream, creek, or associated tributaries. The proposed project improvements do not entail construction impacts to any drainage.

- **Environmental Commitment EC-11:** Prior to Construction, Delineate Cultural Resources to be avoided. The Contractor shall have a qualified archaeologist delineate any areas mapped by LiSWA within the proposed project footprint as having known cultural resources. If present, these areas shall be delineated by orange exclusion fencing and shall have signage denoting “culturally sensitive area.”

3.0 ENVIRONMENTAL IMPACT ASSESSMENT

3.1 REGULATORY UPDATES

The Placer County General Plan, adopted August 16, 1994, has been updated since the approval of the 2013 EIR. The new Placer County General Plan was adopted in May 2013 and does not have any significant changes in goals or policies that would substantially impact the proposed modifications within this Addendum.

The proposed project improvements are in accordance with the Lincoln General Plan, the impacts of which were disclosed in the 2050 General Plan Update and associated General Plan EIR (2006) as well as the 2020 Placer County Conservation Plan (PCCP).

The Placer County Air Pollution Control District CEQA Air Quality Handbook was updated in 2017 since the approval of the 2013 EIR. The GHG threshold within the 2017 CEQA handbook is 10,000 Metric Tons Carbon Dioxide Equivalent per year and is the same threshold that was used for the 2013 EIR, "BAAQMD 2009 CEQA Thresholds of Significance for Stationary Sources (used for the proposed project operational GHG emissions analysis) = 10,000 Metric Tons CO2e/year" (Placer County 2017).

Additionally, the Sunset Industrial Area Plan that was adopted on May 21, 2005, has since been updated and approved on December 10, 2019. This new plan does not have any significant goals or policies that would substantially impact the proposed project improvements other than what was found in the 2013 EIR.

Following the approval of the 2013 EIR, Assembly Bill 52 (AB 52) was enacted in 2015. AB 52 changes sections of the Public Resources Code (PRC) to add consideration of Native American culture within CEQA. AB 52 applies to all CEQA projects with a Notice of Preparation filed on or after July 1, 2015. The 2013 EIR pre-dates this requirement.

No other regulatory framework has been updated since the certification of the 2013 EIR.

3.2 ENVIRONMENTAL SETTING UPDATES

There are no new additions to the environmental setting, except where noted in the specific impact analyses below, because the footprint of the proposed project improvements falls within the 2013 EIR boundaries. This boundary was considered in all the impact analyses.

3.3 ENVIRONMENTAL IMPACT ANALYSIS

This Addendum evaluates the potential for the proposed project improvements to result in new or substantially more severe significant impacts compared to the impacts disclosed in the certified 2013 EIR. This Addendum updates and verifies information from the 2013 EIR, noting any relevant changes to regulations, environmental setting, or impacts, and thus is intended to update the analysis in the 2013 EIR for the proposed project improvements. Table 3-1 summarizes the mitigation measures from the 2013 EIR (Appendix A) applicable to the proposed project improvements. The impact analysis of each of the resource sections is reviewed below and updated as necessary.

Table 3-1: Impacts Comparison and Proposed Project Required Mitigation Measures

Issue Categories Evaluated[1,2]	2013 EIR	2025 Addendum	Mitigation Measures Applicable to the Proposed Project
Land Use and Planning	Less than Significant	No Change	None
Agricultural and Forestry Resources	Less than Significant	No Change	None
Recreation	Less than Significant	No Change	None
Aesthetics	Less than Significant with Mitigation	No Change	AES-3, AES-4, AES-5
Air Quality	Less than Significant with Mitigation	No Change	AIR-1
Greenhouse Gas Emissions	Less than Significant	No Change	None
Noise and Vibration	Less than Significant with Mitigation	Less than Significant	None
Geology and Soils	Less than Significant with Mitigation	No Change	HYDRO-1, CULT-1
Mineral Resources	Less than Significant with Mitigation	No Change	None
Hydrology and Water Quality[1]	Less than Significant with Mitigation	No Change	HYDRO-1, HYDRO-2, WQ-1
Water Resources[2]	Less than Significant	No Change	None
Biological Resources	Less than Significant with Mitigation	No Change	BIO-9
Fisheries Resources[2]	Less than Significant with Mitigation	Less than Significant	None
Cultural Resources	Less than Significant with Mitigation	No Change	CULT-1, CULT-2, CULT-3
Hazards and Hazardous Materials	Less than Significant with Mitigation	No Change	HAZ-2
Public Services and Utilities	Less Than Significant with Mitigation	No Change	PUB-1
Population and Housing	Less than Significant	No Change	None
Transportation and Traffic	Less than Significant with Mitigation	No Change	TRANS-1, TRANS-2
Energy Resources[1]	Not previously analyzed	Less than Significant	None
Tribal Cultural Resources[1]	Not previously analyzed	Less than Significant with Mitigation	CULT-1, CULT-2, CULT-3
Wildfire[1]	Not previously analyzed	Less than Significant with Mitigation	HAZ-2

Notes:

[1] Issue category has been updated and/or added per 2025 CEQA Guidelines, Appendix G (AEP 2025)

[2] Issue category from the 2013 EIR.

EIR = Environmental Impact Report

As shown in Table 3-1 above, the following analysis indicates that the previously identified 2013 EIR mitigation measures would reduce impacts to less than significant levels. The 2013 EIR mitigation measures that are applicable to the proposed project improvements are provided in the following sections. The 2013 EIR references that the applicant would be required to implement the identified mitigation measures to reduce impacts to a less than significant level.

3.3.1 Land Use and Planning

Level of Significance: No change – Less than significant

The proposed project improvements would not:

- Physically divide an established community since all modifications are located within the existing WWTRF boundaries.
- Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect, since there have been no new context changes to the applicable regulatory framework.
- Conflict with any applicable habitat conservation plan or natural community conservation plan since changes to the PCCP have not changed the draft PCCP designation of the WWTRF, as it was disclosed in the 2013 EIR. The proposed project improvements would not impact the long-term conservation goals contained in the County's General Plan and the PCCP.

3.3.2 Agricultural and Forestry Resources

Level of Significance: No change – Less than significant

The proposed project improvements would not:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use since the proposed project improvements are within the footprint of impacts analyzed with the 2013 EIR and do not require any change in land use.
- Conflict with existing zoning for agricultural use, or a Williamson Act contract, since the proposed project improvements are within the footprint of impacts analyzed within the 2013 EIR and are not designated as agricultural land or Williamson Act land.
- Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production since the proposed project improvements are within the footprint of impacts analyzed with the 2013 EIR and are not within forest land, timberland, or timber production zone.
- Result in the loss of forest land or conversion of forest land to non-forest use since the proposed project improvements are within the footprint of impacts analyzed with the 2013 EIR and are not within forest land.

- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. The proposed project improvements are within the footprint of impacts analyzed with the 2013 EIR and would therefore not result in the conversion of farmland or forest land.

3.3.3 Recreation

Level of Significance: No change – Less than significant

The proposed project improvements would not:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment since the proposed project improvements would be located within the footprint of the existing LiSWA WWTRF as evaluated in the 2013 EIR and would not have an impact on recreational facilities.

3.3.4 Aesthetics

Level of Significance: No change – Less than significant with mitigation incorporated

Mitigation Measures: AES-3 Select colors and finishes for above-ground elements that blend with their existing visual environment; AES-4 Include landscaping that is adequate to screen views of major new above-ground facilities; AES-5 Use BMPs to minimize lighting impacts from construction and operation.

The proposed project improvements would not:

- Have a substantial adverse effect on a scenic vista. The proposed LiSWA WWTRF improvements are within the boundaries of the area evaluated in the 2013 EIR, which would not be visible from any locally designated scenic roadway or scenic vista. Therefore, there would not be any change to the impacts evaluated in the 2013 EIR.

- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway, since no officially designated or eligible state scenic highways have been designated in the vicinity of the LiSWA WWTRF since the certification of the 2013 EIR. Therefore, there would be no change to the conclusions in the 2013 EIR. No mitigation measures would be required.

- Substantially degrade the existing visual character or quality of public views of the site and its surroundings. The proposed project improvements would be located within the boundaries of the LiSWA WWTRF, which is a previously developed area characterized visually by industrial-appearing structures and relatively large retention basins. The 2013 EIR concluded that development associated with the proposed Project would be similar to existing facilities in character, color, materials, form, height, and mass. With the implementation of Mitigation Measure (MM) AES-3 (colors and finishes) and MM AES-4 (landscaping), the impact was determined to be less than significant. The impacts associated with the proposed project

improvements are similar to what is described in the 2013 EIR. New improvements would appear alongside facilities and would be similar in appearance, scale, and form.

- Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. The 2013 EIR concluded that impacts related to light and glare would be less than significant with the implementation of BMPs intended to minimize the effects of lighting (MM AES-5). The proposed project improvements are within the footprint of the previously analyzed area and, with implementation of MM AES-3, would not be a new source of substantial light that would affect nighttime views in the area.

3.3.5 Air Quality

Level of Significance: No change – Less than significant with mitigation incorporated

Mitigation Measures: AIR-1 Construction Emission/Dust Control Plan

The proposed project improvements would not:

- Conflict with or obstruct implementation of the applicable air quality plan. The proposed project improvements are relatively small, and construction impacts would be less than those analyzed in the 2013 EIR since the proposed project improvements are much smaller than the model project described in the 2013 EIR. However, as stated in the 2013 EIR and subsequent 2017 Addendum, the proposed project improvements include the addition and upgrading of an influent pump station, a maturation pond pump station, and a filter feed pump station. Pump stations typically include the use of backup generators, subject to Placer County Air Pollution Control District (PCAPCD) permitting. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permits(s) from the PCAPCD prior to construction. Additionally, during construction, the LiSWA shall require the construction contractor to implement MM AIR-1 to maintain potential construction-related air emissions at acceptable levels. This project would be consistent with the goals of the PCAPCD through the implementation of MM AIR-1. Therefore, potential air quality impacts with the proposed project improvements remain less than significant with mitigation incorporated.

- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or California ambient air quality standard (including releasing emissions which exceed quantitative thresholds for Ozone precursors). As stated in the 2013 EIR and subsequent 2017 Addendum, Placer County is currently in non-attainment for State and federal Ozone, State PM10, and federal PM2.5. As a result, an incremental increase in background Ozone or PM levels would be considered a significant impact. The proposed project improvement impacts to cumulatively considerable net increases of any criteria pollutants would be less than what was analyzed in the 2013 EIR and subsequent 2017 Addendum, since construction duration and scale are less and would not be considered significant. The construction for the proposed project improvements would not exceed NOx thresholds, and therefore, any potential cumulative project-related impacts are considered less than significant with no mitigation required.

- Expose sensitive receptors to substantial pollutant concentrations. Since, as stated in the 2013 EIR and subsequent 2017 Addendum, the nearest sensitive receptor for the LiSWA WWTRF is over one mile away, and as such, the proposed project improvements would not expose sensitive receptors to substantial pollutant concentrations. The proposed project improvements would occur within the footprint of the 2013 EIR, and no additional sensitive receptors have been found in the project area. However, naturally occurring asbestos (NOA) is known to occur in some parts of Placer County. According to the Placer County NOA Hazard Maps, the project location is in an area of Placer County that is least likely to contain NOA (Placer County 2008). Air emissions impacts would be minimal with MM AIR-1 incorporated. MM AIR-1 includes PCAPCD requirements for NOA. Therefore, MM AIR-1 would be implemented to reduce the concentrations of pollutants to a less than significant level.

- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Specifically, there would be no new impacts to objectionable odors with the implementation of the proposed project improvements beyond what was previously analyzed in the 2013 EIR. As such, the impacts would still be less than significant, and no mitigation would be required.

3.3.6 Greenhouse Gas Emissions

Level of Significance: No change – Less than significant

The proposed project improvements would not:

- Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment. Since the proposed project improvements would be minor and would be less than what was analyzed in the 2013 EIR, there would be no impacts to GHG emissions beyond what was discussed for the 2013 EIR and subsequent 2017 Amendment. There would be no significant impacts and no mitigation required.

- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Since the approval of the 2013 EIR, the Placer County Air Pollution Control District CEQA Air Quality Handbook has also been updated, and the new GHG thresholds are more stringent than what was analyzed in the 2013 EIR. Proposed project improvements are minor and would have limited construction impacts, and there are no additional conflicts with the new or old thresholds for GHG emissions. As such, no impact would be associated with the proposed project improvements, and thus no mitigation measures would be required.

3.3.7 Noise

Level of Significance: Less than significant

The proposed project improvements would not:

- Expose people to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The proposed project improvements are within the boundaries of the LiSWA WWTRF, and therefore, the exposure to

people of noise levels in excess of standards established in local general plans or noise ordinances is the same as what was analyzed in the 2013 EIR. There remain to be no sensitive receptors within 200 feet of the WWTRF, and therefore, the proposed project improvements would result in a less-than-significant impact, and no mitigation would be required.

- Expose people to or generate excessive ground-borne vibration or ground-borne noise levels. The proposed project improvements would have a similar, if not less than, impact as what was described in the 2013 EIR. Some construction activities may cause ground-borne vibration, but there are no sensitive receptors near the LiSWA WWTRF, and these would be short-term activities. The proposed project improvements would result in a less-than-significant impact, and no mitigation measures would be required.

- Expose people residing or working in the project area to excessive noise levels (for projects located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, within the vicinity of a private airstrip). As stated in the 2013 EIR, there are no private airstrips in the vicinity of the LiSWA WWTRF, and therefore, no impact would occur.

3.3.8 Geology and Soils

Level of Significance: No change – Less than significant with mitigation incorporated

Mitigation Measures: HYDRO-1 Prepare an Erosion Control and Stormwater Pollution Prevention Plan; CULT-1 Proper Handling of Inadvertent Discovery of Cultural and Paleontological Resources

The proposed project improvements would not:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)
  - Strong seismic ground shaking
  - Seismic-related ground failure, including liquefaction
  - Landslides

The proposed project improvements would occur within the footprint of the previously analyzed 2013 EIR, and no additional impacts would occur. Therefore, this would be a less-than-significant impact.

- Result in substantial soil erosion or the loss of topsoil. Proposed upgrades to the LiSWA WWTRF would occur within the bounds of the WWTRF, and therefore, the improvements have been previously planned for and are generally accounted for in the facility's stormwater system. However, there would still be the potential for erosion associated with earthwork occurring during construction. Therefore, implementation of MM HYDRO-1 is necessary to prevent erosion of exposed soils during construction, which would reduce the potential for substantial erosion to less than significant with mitigation.

- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project improvements, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Since the proposed project improvements are within the footprint of the previously analyzed 2013 EIR, no further impact would occur beyond what was previously identified. Any improvements at the WWTRF would be designed in accordance with the Uniform Building Code (1994) specifications and standards. Therefore, impacts would be less than significant.

- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. Since the proposed project modifications are within the footprint of the previously analyzed 2013 EIR, there would be no additional impacts beyond what was described in the 2013 EIR. Where foundations are necessary for construction, they would be comprised of engineered fill at adequate depths to reduce any potential expansion of adjacent soils. Therefore, impacts would be less than significant.

- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. As stated in the 2013 EIR, the proposed project improvements would not incorporate additional septic tanks or alternative wastewater disposal systems. Therefore, impacts would remain less than significant.

- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. As stated in the 2013 EIR, there are no known paleontological resources or unique geologic features in the proposed project area. However, there is always the possibility, however remote, that previously unknown paleontological resources could be encountered during construction activities. Therefore, MM CULT-1 would still be required to reduce impacts to a less than significant level.

3.3.9 Mineral Resources

Level of Significance: No change – Less than significant

The proposed project improvements would not:

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. As stated in the 2013 EIR, there are no known significant mineral resources located at the WWTRF site. Therefore, the proposed project improvements would not have a significant impact to the loss of mineral resources that would be valuable to the region and the residents. No mitigation measures would be required.

- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. As stated in the 2013 EIR, there are no mineral resource recovery sites delineated within 300 feet of the project. Furthermore, since the proposed project improvements are within the LiSWA WWTRF footprint, no impact would occur.

3.3.10 Hydrology and Water Quality

Level of Significance: No change – Less than significant with mitigation incorporated

Mitigation Measures: WQ-1 Avoid/Minimize Potential Water Quality Impacts from Construction Activities; HYDRO-1 Prepare an Erosion Control and Stormwater Pollution Prevention Plan; HYDRO-2 Dry Season Construction

The proposed project improvements would not:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Discharge of effluent from the LiSWA WWTRF into Auburn Ravine would not cause substantial degradation of the water quality or exceedance of Water Quality Objectives or Water Quality Criteria. As discussed in the 2013 EIR, the LiSWA WWTRF would continue to treat effluent to a standard that is protective of all beneficial uses within Auburn Ravine. The proposed project improvements are minor improvements to the WWTRF and would be designed to enhance the overall water quality of the region. In addition, the 2013 EIR assessed the Project-specific impacts to hydrology and water quality to buildout, and thus the proposed improvements fall within the bounds of that analysis. As discussed in the 2013 EIR, the LiSWA WWTRF was expanded to comply with the current National Pollutant Discharge Elimination System (NPDES) temperature limitation and will continue to do so through buildout. Therefore, the proposed project improvements would not cause an increase in water temperature in Auburn Ravine beyond the increase allowed by the NPDES permit, which is protective of beneficial uses and would not substantially degrade water quality. Therefore, the impacts are less than significant, and no mitigation would be required. In addition, the proposed project construction activities would be subject to the NPDES General Construction Permit for Discharge of Stormwater Associated with Construction Activity. As discussed in the 2013 EIR, compliance with BMPs and the implementation of MM WQ-1 and HYDRO-1 would be required to reduce any impacts to a less than significant level.

- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The proposed project improvements are located within the boundaries of the WWTRF boundary; the area which was contemplated for WWTRF development within the 2013 EIR. As such, the proposed project improvements contemplated in this Addendum do not interfere with groundwater. As the WWTRF expands, more water can be recycled, reducing pressure on groundwater by the City.

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

  - Result in a substantial erosion or siltation on- or off-site;
  - Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;

- Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
- Impede or redirect flood flows.

The proposed project improvements would be similar to those analyzed in the 2013 EIR but smaller in scale. These impacts would remain less than significant with the incorporation of MM HYDRO-1 and MM HYDRO-2.

- Risk release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone. The proposed project improvements would be similar to those analyzed in the 2013 EIR. These impacts would remain less than significant with the incorporation of MM HYDRO-1 and MM HYDRO-2.

- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The proposed project improvements are within the Sacramento Valley–North American groundwater basin, which the Department of Water Resources classifies as a high-priority groundwater basin (DWR 2025). In 2014, the Sustainable Groundwater Management Act (SGMA) was signed, which requires groundwater basins/subbasins designated by the California Department of Water Resources (DWR) as medium- or high-priority to follow four basic steps: 1) form a Groundwater Sustainability Agency (GSA); 2) develop and adopt a Groundwater Sustainability Plan (GSP); 3) implement the GSP to achieve a sustainability goal and avoid undesirable results within 20 years; and 4) report the implementation activities to the DWR to document whether the sustainability goal and the avoidance of undesirable results is being achieved. Per the 2013 EIR, dischargers will comply with water quality objectives as defined in the Central Valley Basin Plan. If Basin Plan objectives are exceeded, corrective measures would be required. Additionally, the proposed project improvements contemplated in this Addendum do not interfere with groundwater. As the WWTRF expands, more water can be recycled, reducing pressure on groundwater by the City.

3.3.11 Water Resources

Level of Significance: No change – Less than significant

The proposed project improvements would not:

- Significantly reduce Rock Creek and upper Auburn Ravine flows, such that their lower reaches are affected. Since the proposed project improvements would occur within the footprint of the LiSWA WWTRF, the proposed project improvements would result in no impacts to Rock Creek and upper Auburn Ravine flows beyond what was discussed in the 2013 EIR. Therefore, the impact is less than significant, and no mitigation would be required.

- Trigger significant upstream water withdrawals by water purveyors to compensate for the effluent lost from the stream system, thereby reducing their overall available supply. No additional impacts would be caused by the proposed project improvements beyond what was discussed in the 2013 EIR.

3.3.12 Biological Resources

Level of Significance: No change – Less than significant with mitigation incorporated

Mitigation Measures: BIO-9 Avoid disturbance of nesting special-status migratory birds, raptors

The proposed project improvements would not:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

  Since the proposed project improvements would occur in the footprint of the previously analyzed 2013 EIR and no special-status plants were observed during a protocol-level survey (Stantec 2012), the potential for special-status plants is low. Online databases, including CDFW's California Natural Diversity Database, USFWS's Information for Planning and Consultation planning tool, and California Native Plant Society's Rare Plant Inventory, were reviewed for updated occurrences and listed species (CDFW 2015, CNPS 2025, USFWS 2025). The results of the databases concluded no new occurrences within the bounds of the LiSWA WWTRF.

  As discussed in the 2013 EIR, no valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) habitat was identified within or adjacent to the LiSWA WWTRF (Stantec 2012), no vernal pools are located within the proposed project improvements, and no suitable habitat exists for the federally listed California red-legged frog (*Rana draytonii*) within the bounds of the LiSWA WWTRF. Therefore, there is no suitable habitat for regionally occurring special-status animal species in the proposed project area.

  As discussed in the 2013 EIR, the LiSWA WWTRF does not contain habitat for non-federally listed special-status species and would not remove any habitats for these species. However, the LiSWA WWTRF is bordered by vernal pools and riparian habitat, which may provide habitat for special-status species. Therefore, impacts to special-status species and their habitats in the areas adjacent to the LiSWA WWTRF would be less than significant with Mitigation Measure HYDRO-1 incorporated for the proposed project improvements. Additionally, no roost trees would be removed and, therefore, there would be no impact to special-status bats.

  The proposed project improvements may cause disturbance of nesting migratory birds and raptors during construction activities (if conducted during nesting season – approximately February 15 through August 15). The proposed project improvements are likely to have an effect on natural habitat for nesting birds or raptors since the proposed project improvements are within the LiSWA WWTRF, which includes limited suitable nesting habitat, and BIO-9 would be implemented to ensure proper handling should any nesting birds or raptors be encountered. Therefore, no impacts would occur to nesting birds or raptors with mitigation incorporated.

- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. As discussed in the 2013 EIR, there are no riparian vegetation areas or habitats within the LiSWA WWTRF footprint. The proposed project improvements would not disturb adjacent riparian vegetation, habitats, or waterways because

construction and improvements would be limited to the WWTRF site, and due to the distance from riparian vegetation and habitat along Orchard Creek, there are no indirect impacts anticipated to occur beyond what was analyzed in the 2013 EIR. Therefore, there would be no impact to riparian vegetation or habitats.

- Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, causing loss of wetlands from the proposed project improvements. The 2013 EIR determined that wetlands and waters of the U.S. occur within and adjacent to the LiSWA WWTRF. However, the proposed project improvements would not impact wetland or waters of the U.S. or waters of the State since the proposed project improvements would occur within previously disturbed sites that are not within or adjacent to wetland or waters of the U.S. or State. Therefore, no mitigation would be required.

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. As evaluated in the 2013 EIR, the LiSWA WWTRF is within an area that has been previously disturbed and does not provide suitable wildlife movement or migration corridors. The proposed project improvements would not add any further impacts that would inhibit wildlife movements or migrations. Therefore, the potential impact from the proposed modifications would be considered less than significant, and no mitigation would be required.

- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (i.e., trees protected by the Placer County Tree Preservation Ordinance). The proposed project improvements would not require the removal of any heritage oak or other protected trees over 24 inches in diameter at breast height. As stated in the 2013 EIR, no such trees exist at the LiSWA WWTRF, and therefore, there would be no potential impact to the Placer County Tree Preservation Ordinance.

- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The proposed project improvements are in accordance with the Lincoln General Plan, the impacts of which were disclosed in the 2050 General Plan Update and associated General Plan EIR (2006), and the Placer County Conservation Plan (PCCP). The Lincoln General Plan growth is a Covered Activity under the PCCP, assuming compliance with the terms of the PCCP and the Placer County Aquatic Resources Program. The Potential Future Growth Area and its effects on Covered Species and wetlands are included at a programmatic level in the PCCP. No new goals or objectives have been made that would substantially affect the proposed project improvements to the LiSWA WWTRF. The proposed project improvements are still in accordance with the PCCP, and as such, the potential conflict with an existing or planned habitat conservation plan would be considered less than significant.

3.3.13 Fisheries Resources

Level of Significance: Less than significant

The proposed project improvements would not:

- Cause direct mortality or stranding of federal or State-listed, locally protected fish species, or species of concern during construction. As stated in the 2013 EIR, construction at the LiSWA WWTRF would not entail in-water work at locations where there are known occurrences of listed species. The proposed project improvements would not result in a change to the 2013 EIR's determination that there is no impact to or potential for stranding of federally-listed, State-listed, or other protected fish species.

- Cause direct mortality or stranding of special status and native fish species during construction. As stated in the 2013 EIR, the potential for direct mortality or stranding of native fish during WWTRF modifications is extremely unlikely. This same analysis applies to the proposed project improvements as they would occur outside the streambed and bank and therefore would not have the potential to cause mortality or stranding within adjacent waterways. This potential impact is considered less than significant, and no mitigation would be necessary.

- Cause adverse impacts to native or listed fisheries, or their prey, from an accidental spill of petroleum products and other construction-related materials (contaminants) during construction. The proposed project improvements would occur within the existing fence line of the LiSWA WWTRF, and there are no waterways within the fence line of the WWTRF. Therefore, the impacts to native fish and their prey from accidental spill of petroleum and other construction-related materials would be unlikely and considered less than significant.

- Cause stream bank and streambed destabilization, causing erosion and adverse habitat modifications for native or federally or State-listed species and their associated designated Critical Habitat or Essential Fish Habitat during and post-construction, since the proposed project improvements would not entail work within the streambed and bank.

- Cause construction-related disturbance or loss of woody riparian shade vegetation and associated nutrient input, shelter, and water temperature insulation properties. The proposed project improvements would not entail work within the streambed and bank or require the removal of any riparian trees.

- Cause direct mortality/stranding of native, federal, or State-listed fish species or long-term adverse modification of designated Critical Habitat or Essential Fish Habitat in Auburn Ravine during project operation. The proposed project improvements would occur within the fence line of the LiSWA WWTRF. None of the activities associated with the proposed modifications would impact mortality/stranding of native, federal, or State-listed fish species or long-term adverse modification of designated Critical Habitat or Essential Fish Habitat in Auburn Ravine during operation. Therefore, no impact would occur, and no mitigation would be required.

- Cause a conflict with any local policies or ordinances protecting fisheries resources. The proposed project improvements would be in compliance with the local policies or ordinances that protect fishery resources. The proposed modifications are minor and do not conflict with any of the local policies or ordinances, and therefore, no mitigation would be required.

- Cause a conflict with provisions of a fishery-related adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. There are no potential conflicts with provisions of a fishery-related adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan regarding the proposed project improvements. The 2013 EIR discusses mitigation measures needed; however, since the proposed project improvements are minor, no mitigation measures would be required.

3.3.14 Cultural Resources

Level of Significance: No change – Less than significant with mitigation incorporated

Mitigation Measures: CULT-1 Proper Handling of Inadvertent Discovery of Cultural and Paleontological Resources; CULT-2 Proper Handling of Inadvertent Discovery of Human Remains; CULT-3 Pre-Construction Cultural Resource Awareness Training and Cultural Resource Construction Monitoring

The proposed project improvements would not:

- *Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines 15064.5.*

- For a cultural resource to be considered a historical resource (i.e., eligible for listing in the California Register of Historical Resources [CRHR]), it must generally be 50 years or older. Under CEQA, historical resources can include pre-European contact (i.e., Native American) archaeological deposits, historic-period archaeological deposits, and built environment resources such as landscapes, historic buildings, and districts.

Records Search Results

In order to identify built environment or archaeological resources that could be impacted by new development within the WWTRF, Stantec requested a records search (File #PLA-25-31) for the WWTRF and a 0.5-mile radius on April 10, 2025, at the North Central Information Center (NCIC) at Sacramento State University. The NCIC, an affiliate of the California Office of Historic Preservation, is the official state repository of cultural resources records and reports for Placer County.

Four previously recorded cultural resources were identified within the proposed project site, three built environment and one archaeological resource. The three built environment resources were evaluated and recommended as not eligible for the CRHR; therefore, they do not qualify as historical rescores for the purposes of CEQA.

One archaeological resource, a historic-period refuse scatter, has not been evaluated for the CRHR. Eight resources were identified within 0.5 mile of the proposed project site.

All resources identified during the current record search were analyzed in the 2013 EIR and 2017 Addendum and are outside of the proposed project components. Updated record search materials are included in Confidential Appendix C, *Lincoln-SMD1 Wastewater Authority Wastewater Treatment and Reclamation Facility EIR Addendum 2025 Cultural Resources Update.*

Built Environment Resources

The proposed project site does not contain any built environmental resources that qualify as historical resources for the purposes of CEQA. Therefore, the proposed project would not have the potential to cause a substantial adverse change to the significance of any built environment historical resource, as defined in Section 15064.5 of the CEQA Guidelines. The proposed project would not demolish a significant historical resource or alter its physical characteristics, nor would it change elements within the historic setting of such a resource. Therefore, the proposed project would have no impact on the built environment historical resources.

Archaeological Resources

The records search identified one previously recorded archaeological resource within the proposed project site, a historic-period refuse scatter which has not been evaluated for the CRHR. However, this resource is located approximately 0.40 miles from the proposed project components and is not impacted by project construction.

As stated in the 2013 EIR, the western area of the proposed project site where the maturation ponds modifications are located is within an area of high sensitivity for buried pre-European contact archaeological deposits (Figure 3-1); therefore, there is possibility that previously unknown archaeological deposits that qualify as historical resources could be encountered during project construction activities. Should such deposits be encountered during project ground disturbance, a substantial adverse change in the significance of a historical resource would occur from its demolition, destruction, relocation, or alteration such that the significance of the resource would be materially impaired (CEQA Guidelines Section 15064.5(b)(1)).

The application of the 2013 EIR Mitigation Measures to reduce any potential impacts on archaeological resources remains necessary for the proposed project improvements. Specifically, the proposed project improvements would be subject to CULT-3, which provides for archaeological monitoring in areas of high sensitivity for buried archaeological deposits, and CULT-1, which provides procedures should a deposit be encountered during project construction.

Consistent with the conclusions in the 2013 EIR and 2017 Addendum, impacts on archaeological deposits that could qualify as historical resources would be less than significant. Therefore, the proposed project improvements would not result in greater or worse impacts than those evaluated in the 2013 EIR and 2017 Addendum, and no additional mitigation measures would be required.

The proposed project improvements would not:

- *Cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines 15064.5.*

- According to the CEQA Guidelines, "When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource" (CEQA Guidelines Section 15064.5(c)(1)). Those archaeological sites that do not qualify as historical resources shall be assessed to determine whether they qualify as "unique archaeological resources" (California PRC Section 21083.2 and State CEQA Guidelines Section 15064.59 (c)(3)).

- As discussed above, the western area of the proposed project site, where the maturation ponds modifications are located is within an area of high sensitivity for buried pre-European contact archaeological deposits (Figure 3-1); therefore, there is the possibility that previously unknown archaeological deposits could be encountered during project construction activities. The 2013 EIR and 2017 Addendum determined that impacts to archaeological resources would be less than significant with the implementation of CULT-1 and CULT-3. Therefore, the proposed project improvements would not result in greater or worse impacts than those evaluated in the 2013 EIR and 2017 Addendum, and no additional mitigation measures would be required.

The proposed project improvements would not:

- *Disturb any human remains, including those interred outside of formal cemeteries.*

- As discussed above, the western area of the proposed project site where the maturation ponds modifications are located is within an area of high sensitivity for buried pre-European contact archaeological deposits which could contain human remains (Figure 3-1); therefore, there is a possibility that the proposed project improvements could disturb human remains.

- In the event that human remains are identified during proposed project improvements, these remains would be required to be treated in accordance with Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the Public Resources Code, as appropriate. In addition, the proposed project improvements would be required to comply with the 2013 EIR Mitigation Measures to reduce any potential impacts to human remains. Specifically, the proposed project improvements would be subject to CULT-3, which proves for archaeological monitoring in areas of high sensitivity for buried archaeological deposits, and CULT-2, which provides procedures should human remains be encountered during proposed project improvements.

- Therefore, the proposed project improvements would not result in greater or worse impacts than those evaluated in the 2013 EIR and 2017 Addendum, and no additional mitigation measures would be required.

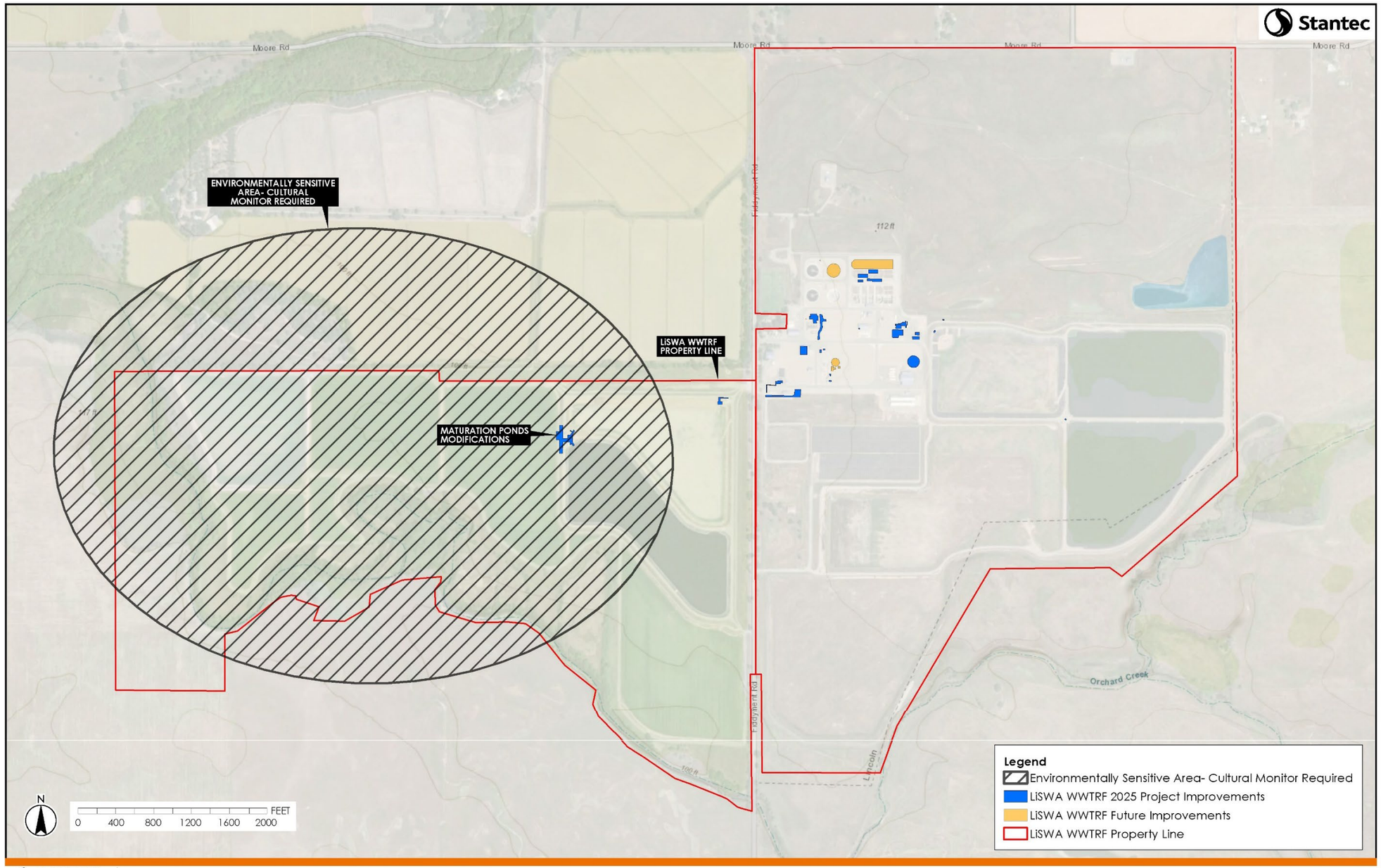

Figure 3-1: Environmentally Sensitive Area

3.3.15 Hazards and Hazardous Materials

Level of Significance: No change – Less than significant with mitigation incorporated

Mitigation Measures: Refer to Mitigation Measure AIR-1 in the Air Quality and WQ-1 in the Hydrology and Water Quality sections of this document; HAZ-2 Prepare Fire Suppression and Control Plan

The proposed project improvements would not:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. There are no additional impacts associated with the proposed project improvements beyond what was discussed in the 2013 EIR. Temporary construction activities may involve the transport and use of hazardous materials typically associated with construction, including gasoline, diesel fuel, hydraulic fluid, solvents, and oils. All handling of hazardous materials associated with the proposed project improvements would be in accordance with federal and state laws. Therefore, the potential for impacts related to hazardous materials transport, use, or disposal is considered less than significant.

- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No further impacts beyond what was discussed in the 2013 EIR would occur under the proposed project improvements. As such, Mitigation Measure WQ-1 may be required to reduce potential impacts to a less than significant level.

- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. At the time of the 2013 EIR, no schools are present within one-quarter mile of the Lincoln WWTRF, which remains to be true in May 2025. Therefore, the proposed project improvements would not have any potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

- Be located on a site that is included on a list of hazardous materials sites pursuant to Government Code Section 65962.5, and as a result, it would not create a significant hazard to the public or the environment. As stated in the 2013 EIR, the LiSWA WWTRF is not located on land identified on the Cortese List database. Therefore, the proposed project improvements would have no impact.

- Result in a safety hazard for people residing or working in the project area (for projects located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport). As stated in the 2013 EIR, the Lincoln Regional Airport is the closest public airport located approximately 2.6 miles to the north of the LiSWA WWTRF. The LiSWA WWTRF site is located within Compatibility Zone D of the Placer County Airport Land Use Compatibility Plan. The proposed project improvements include completing upgrades of the existing treatment plant and would not include any component that would result in a substantial safety hazard for people residing or working in the proposed project improvements area related to airport use. Therefore, this is a less-than-significant impact.

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As stated in the 2013 EIR, no emergency response plans or emergency evacuation plans are known to exist for areas within LiSWA WWTRF site. Access for fire and police emergency response vehicles would be maintained on roads along or near the WWTRF. Therefore, the proposed project improvements are not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Thus, this is a less-than-significant impact.

- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. As stated in the 2013 EIR, the LiSWA WWTRF is located within a Local Responsibility Area and is in a Non-Very High Fire Hazard Severity Zone. Therefore, potential impacts related to wildland fires are less than significant for the proposed project improvements, and will implement MM HAZ-2.

3.3.16 Public Services and Utilities

Level of Significance: No change – Less than significant with mitigation incorporated

Mitigation Measures: PUB-1 Reduction in Solid Waste Generated from Construction Activities

The proposed project improvements would not:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

  - Fire protection;
  - Police protection;
  - Schools;
  - Parks;
  - Other public facilities.

The proposed project improvements would fall within the LiSWA WWTRF property of the 2013 EIR boundaries. Since this area was previously analyzed for potential impacts to increase demand for public services, and no impact was found, the same conclusion applies to the proposed project improvements. Therefore, construction of the proposed project improvements would not result in substantial adverse physical impacts associated with the provision, or need, of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services. This is a less-than-significant impact.

- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. As discussed in the 2013 EIR, the Project was an upgrade and expansion of the wastewater facility, and the subject of the EIR. Therefore, the proposed project improvements would not indirectly

trigger any wastewater facility upgrades, as could be the case with, for example, a proposed commercial or housing development project. This same analysis applies to the proposed project improvements because they would be an upgrade of the existing LiSWA WWTRF. No new impact would occur, and therefore, the potential for the proposed project improvement modifications to trigger the construction of additional water and wastewater treatment facilities is considered less than significant.

- Not have sufficient water supplies available to serve the proposed project improvements from existing entitlements and resources, or if new or expanded entitlements are needed. As discussed in the 2013 EIR, construction of the wastewater treatment facilities modifications would require some additional water supply for dust control, clean-up, soil compaction, and facility testing. The City has several different sources of water in the area that would be sufficient for the proposed project improvements. Additional water use during construction would be temporary and minimal and would not constitute a significant impact that would require new or expanded water supply resources.

- Result in a determination by the wastewater treatment provider that serves or may serve the proposed project improvements that do not have adequate capacity to serve the proposed project improvements projected demand in addition to the provider's existing commitments. As discussed in the 2013 EIR, the construction activities may cause a temporary increase in wastewater generation. This increase would be incremental, of limited duration, and not result in the wastewater treatment provider proposed to serve the City of Lincoln to determine that it does not have adequate capacity to serve the proposed project improvements projected demand in addition to the provider's existing commitments; thus, the impact is considered less than significant.

- Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The impacts associated with solid waste disposal needs discussed in the 2013 EIR are anticipated to be significantly less for the proposed project improvements and modifications. Although there is not anticipated to be a significant increase in solid waste, Mitigation Measure PUB-1 may still need to be implemented in order to reduce potential impacts to a less than significant level.

- Not comply with federal, state, and local statutes and regulations related to solid waste or wastewater. In the 2013 EIR, mitigation measures were required to be in compliance with the Placer County 50-foot setback requirement for sewer lines relative to water wells. Since the proposed project improvements would all occur within the LiSWA WWTRF property, no mitigation regarding this rule would be necessary. However, Mitigation Measure PUB-1 would be required to be in compliance with local waste statutes in order to reduce potential impacts to a less than significant level.

3.3.17 Population and Housing

Level of Significance: No change – Less than significant

The proposed project improvements would not:

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). No new impacts to induce population growth in western Placer County beyond what was discussed in the 2013 EIR would occur with the proposed modifications. The project analysis included a study of treatment capacity for the LiSWA WWTRF and found that upgrades were needed to meet the capacity requirements. The proposed project improvements entail the project-specific aspects of the upgrades contemplated in the 2013 EIR to accommodate planned growth. Therefore, the proposed modifications would not directly or indirectly induce growth as CEQA Guidelines Section 15126.2[d].

- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. All construction associated with the proposed project improvements would occur within the existing LiSWA WWTRF site. No housing or people would be displaced for the construction at the LiSWA WWTRF; therefore, there would be no impact to existing housing in the City of Lincoln.

3.3.18 Transportation and Traffic

Level of Significance: No change – Less than significant with mitigation incorporated

Mitigation Measures: TRANS-1 Prepare and Implement a Traffic Control Plan; TRANS-2 Inform the Public of Lane Closures and Detours

The proposed project improvements would not:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. No additional impacts beyond what was discussed in the 2013 EIR would occur for the proposed project improvements. The proposed project improvements at the LiSWA WWTRF would not directly affect any roadways, other than adding a small amount of construction traffic during the construction of the improvements. These activities would not conflict with a local plan or policy establishing measures of effectiveness for the performance of the circulation system, and thus, the impact is considered less than significant to transportation resources.

- Conflict or be inconsistent with CEQA Guidelines Section 15064.3. Section 15064.3 identifies vehicle miles traveled (amount and distance of automobile traffic attributable to a project) as the most appropriate measure of transportation impacts rather than level of service (LOS), which evaluates a project's impacts based on traffic conditions on nearby roadways and intersections and was used for the analysis within the 2013 EIR. The proposed project improvements would not directly affect any roadways, other than adding a small amount of construction traffic during the construction of the modifications. The increase in traffic to the site and during construction would not conflict with an applicable congestion management program, including, but not limited

to, previous LOS standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. However, mitigation measures TRANS-1 and TRANS-2 may need to be implemented to reduce any potential traffic impacts to a less than significant level. Thus, the impact to traffic resources would be less than significant with mitigation.

- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). The proposed project improvements would not change existing roadway designs or incompatible uses. The entirety of the proposed modifications would occur on the LiSWA WWTRF site; therefore, there is no potential to increase hazards due to a design feature or incompatible uses.

- Result in inadequate emergency access. The proposed project improvements would not directly affect any of the roadways, other than adding a small amount of construction traffic during implementation of the proposed project improvements. Construction at the LiSWA WWTRF would occur on-site and is not anticipated to cause delays or road closures on Fiddyment Road or other adjacent roadways. Thus, the proposed project improvements would have no impact on emergency access.

3.3.19 Energy Resources

Level of Significance: Less than significant

The proposed project improvements would not:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Since the proposed project improvements would be minor and would result in lower energy consumption than what was described within the 2013 EIR, there would likely be a less-than-significant impact in regard to energy consumption, and therefore, no mitigation is required.

- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency. In 2020, the Placer County Board of Supervisors adopted the Placer County Sustainability Plan (PCSP), which establishes goals and policies for energy efficiency. As a result, the PCSP is considered the local plan for renewable energy and efficiency. A 10-acre 3.7 MW solar field was constructed within the LiSWA WWTRF in 2019, which offsets existing energy use and increases energy efficiency. Components of the proposed project improvements are not anticipated to have impacts to energy resources greater than what was previously analyzed in the 2013 EIR.

3.3.20 Tribal Cultural Resources

Level of Significance: Less than significant with mitigation incorporated

Mitigation Measures: CULT-1 Proper Handling of Inadvertent Discovery of Cultural and Paleontological Resources; CULT-2 Proper Handling of Inadvertent Discovery of Human Remains; CULT-3 Pre-Construction Cultural Resource Awareness Training and Cultural Resource Construction Monitoring

The proposed project improvements would not:

- *Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, including:*
  - *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or*
  - *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

As part of the 2013 EIR impact analysis and pursuant to the 2050 General Plan Update Policy *OSC-6.9: Native American Resources*, the City of Lincoln consulted with representatives from United Auburn Indian Community (UAIC) to discuss concerns regarding potential impacts to cultural resources, including archaeological sites and tribal cultural resources.

Site visits with representatives from UAIC were conducted in October 2012 to identify areas of concern to UAIC that may be impacted by the 2013 Midwestern Placer Regional Sewer Project. As a result of the site visit and consultation with UAIC, the City drafted avoidance procedures for known resources of concern to UAIC, identified areas of high sensitivity for buried archaeological deposits, and drafted mitigation measures CULT-1, CULT-2, and CULT-3. Mitigation measure CULT-3 requires tribal monitoring by a UAIC representative in areas of high sensitivity for buried archaeological deposits (Figure 3-1), and CULT-1 and CULT-2 outline procedures should an archaeological deposit or human remains be encountered during project construction.

On April 7, 2025, Stantec submitted a request to the Native American Heritage Commission (NAHC) to review its Sacred Lands File for the proposed project site. The NAHC is the official state repository of Native American sacred site records in California. Stantec received a response on April 10, 2025, from the NAHC, stating that, “A record search of the NAHC Sacred Lands File was completed for the information submitted for the above-referenced project. The results were negative....”

As stated in the 2013 EIR and described in Section 3.4.6 Cultural Resources, the western area of the proposed project site where the maturation ponds modifications are located is within an area of high sensitivity for buried pre-European contact archaeological deposits; therefore, there is a possibility that previously unknown archaeological deposits that qualify as tribal cultural resources could be encountered

during project construction activities. Such resources would be eligible for listing in the CRHR or a local register of historical resources, or the lead agency, in its discretion and supported by substantial evidence, could determine the resources to be significant pursuant to the criteria set forth in subdivision (c) of PRC Section 5024.1. Should deposits be encountered during project excavation, this could result in an adverse change to a tribal cultural resource. However, the proposed project would be required to comply with the 2013 EIR Mitigation Measures to reduce any potential impacts on archaeological resources that could qualify as tribal cultural resources. Specifically, the proposed project would be subject to CULT-3, which provides tribal monitoring in areas of high sensitivity for buried deposits, CULT-1, which provides procedures should a deposit be encountered during project construction, and CULT-2, which details procedures should human remains be encountered during project construction.

Therefore, the proposed project improvements would not result in greater or worse impacts than those evaluated in the 2013 EIR and 2017 Addendum, and no additional mitigation measures would be required.

3.3.21 Wildfire

Level of Significance: Less than significant with mitigation incorporated

Mitigation Measures: HAZ-2 Prepare Fire Suppression and Control Plan

The proposed project improvements would not:

- Substantially impair an adopted emergency response plan or emergency evacuation plan.
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

As stated in the 2013 EIR, access for fire and police emergency response vehicles would be maintained on roads along or near the WWTRF. The LiSWA WWTRF is located within a Local Responsibility Area and is in a Non-Very High Fire Hazard Severity Zone. Potential impacts related to wildland fires are low; however, the LiSWA WWTRF is located among grasslands. Therefore, with the implementation of MM HAZ-2, impacts would be less than significant.

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Appendix A MITIGATION AND MONITORING REPORTING PROGRAM

Appendix B DATABASE SEARCH RESULTS

Appendix C CULTURAL RESOURCES RECORDS SEARCH RESULTS AND TECHNICAL MEMO

This technical memo contains confidential information regarding the location of archaeological resources. Such resources are nonrenewable, and their scientific, cultural, and aesthetic values can be significantly impaired by disturbance. To deter vandalism, artifact hunting, and other activities that can damage such resources, this study is not included in Appendix C. The legal authority to restrict cultural resources information is in Section 304 of the National Historic Preservation Act of 1966, as amended. Furthermore, California Government Section Code 6254.10 exempts archaeological sites from the California Public Records Act, which requires that public records be open to public inspection.