

## **JUSTIFICATION & FINDINGS FOR NOTICE OF EXEMPTION**

### **Replacement of Needles City Well No.11 Treatment System and Distribution Pipeline**

On August 10, 2021, the City Council of the City of Needles adopted Emergency Resolution No. 2021-49 Declaring a Local Emergency Threatening Water Service To the Needles Community. The City Council found that due to the immediate threat to municipal water service upon which the community relies for life sustaining potable water, a local emergency exists throughout the City of Needles pursuant to the Emergency Services Act, Government Code Sections 8558, et. seq. It further found that this emergency situation presents a threat to the life, health, and property of City residents. Given this emergency, the Resolution stated that the City of Needles Mayor, Vice Mayor and City Manager are authorized to take all actions to protect the interests of the City and to protect the health, safety and welfare of residents as a result of operating on one well and to address the threat to water service.

On August 16, 2021, the City filed a Notice of Exemption for the drilling of City Well No. 16 which was needed to provide redundancy in the City's water system, particularly with respect to the well supply. The Water Master Plan recommended that the City drill a new well capable of producing a minimum of 1,500 gpm to provide backup for the 2019 system demands. Consistent with the 2019 Water Master Plan and to meet the additional demands placed on the water system by three wells being taken out of production in 2020, the construction of Well No. 16 that time was justified. Construction of the well began February 14, 2022 and after reaching a depth of 400', aquifer zone testing was conducted. Lab sample results show that in both zones the iron is above the State's Secondary Maximum Contaminate Level (SMCL) and manganese is either near or above the SMCL in Zone 2 and below the SMCL in Zone 1. The iron content was further analyzed and found to be primarily ferric iron. Additionally, the total dissolved solids (TDS) were generally between 800-900 mg/L in both zones, with a SMCL at 500 mg/l. The City suspended drilling while alternative solutions were researched.

The selected alternative is to replace the existing groundwater treatment system at Well No. 11 to treat the high levels of iron, manganese, and TDS. A backup generator will also be installed, which does not currently exist at the site. All work would occur within the existing fenced area of Well No. 11 and the treatment facilities. No disturbance to lands outside currently fenced and disturbed area would occur. Additionally, the 16-inch pipeline material that was to be used to distribute water from the new Well No. 16 to the City's system will be used instead to replace in-kind existing 2,855 linear feet of 60+ year old distribution pipe from Well No. 12 (near Bush Street and Smokestack Avenue) southerly to Well No. 11 treatment facilities. The City needs this dedicated intertie line between the two wells so the contaminated water pumped from Well 12 can be delivered to the Well 11 site for treatment prior to entering the City's potable water distribution system. The pipeline replacement will be within existing rights-of-way and no new permanent areas of disturbance would occur. The pipeline replacement will not increase capacity.

The justification of no impacts to specific environmental resources follows.

#### Air Quality

Construction of the treatment system and pipeline replacement would result in temporary impacts to air quality which would be minimized by following the requirements for dust control imposed by the Mojave Desert Air Quality Management District (MDAQMD) (Rule 403.2 Fugitive Dust Control for the Mojave Desert Planning Area). Operational impacts would be the same as those associated with the existing facilities and no increase in capacity is proposed.

#### Biological Resources

Well No. 11 site is maintained for weed control to allow access to the facilities. There are two mature trees at the southeast corner of the site that will not be disturbed during construction activities.

Therefore, no habitat disturbance at the Well No. 11 site would permanently occur. There is no habitat within the road rights-of-way associated with the pipeline replacement.

#### Cultural Resources

Well No. 11 site is currently developed with water system facilities. Excavation work will occur in currently disturbed areas of tanks, treatment equipment and pipelines. No cultural resources are identified in the City's General Plan within the project's areas of disturbance.

#### Water Quality

No changes would occur to the drainage patterns, and no modifications to floodplains or flow patterns would result from the treatment system and pipeline replacements. No changes to topography or disturbed areas would occur thereby changing any flows to the Colorado River.