

## 8 WATER SUPPLY

This chapter describes the existing facilities and water supply service provider in the project vicinity, discusses the environmental impacts of serving projected demands, and recommends mitigation measures to reduce or eliminate significant impacts. This analysis is based on a Water Supply Assessment for the project prepared by Tully and Young (Easton WSA) for the City of Folsom pursuant to California Water Code Section 10911(b); a copy of the Easton WSA is included in this Environmental Impact Report (EIR) as Appendix H.

### 8.1 REGULATORY SETTING

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#### 8.1.1 FEDERAL

Under the **Safe Drinking Water Act** (SDWA; 42 USC 300f et seq.), the U.S. Environmental Protection Agency (EPA) has established national health-based standards for drinking water that include standards for source water protection and treated water quality.

#### 8.1.2 STATE

The **California Safe Drinking Water Act** (CA SDWA; California Health and Safety Code 116270–116751) authorizes the California Department of Public Health (CDPH) to establish maximum contaminants levels (MCLs) that are at least as stringent as those required by the EPA under the SDWA. The CDPH has established MCLs for contaminants that may occur in public water systems, including all the substances for which federal MCLs exist, and may have adverse health effects. Operators of public water systems in California are required to meet federal and state drinking water standards.

The California Water Code Sections 10910 through 10912, commonly referred to as **Senate Bill (SB) 610**, require an identified water purveyor to prepare a water supply assessment for proposed large development projects subject to the California Environmental Quality Act (CEQA) and to include it with the EIR. The City of Folsom has prepared the Easton WSA for the project pursuant to SB 610.

The California Government Code Section 66473.7, commonly referred to as **SB 221**, requires an identified water purveyor to prepare a written verification that a sufficient water supply is available to serve proposed tentative subdivision maps of greater than 500 dwelling units. Pursuant to SB 221, the City of Folsom will be required to prepare a written verification of sufficient water supply for tentative subdivision maps included in the project.

### 8.1.3 LOCAL

The **Sacramento County General Plan** Public Facilities Element encourages new development to be served by existing public water systems, either by annexation to an existing water purveyor's service area or by extension or creation of a benefit zone of the Sacramento County Water Agency (SCWA) (Sacramento County 1993). Objectives of the General Plan policies include minimizing impacts on in-stream water flows in the Sacramento and American Rivers and consolidating water service under existing public water systems. Development projects shall be required to cover their fair share costs of water facilities.

Pursuant to California Water Code Section 10610, the City of Folsom adopted its **2005 Urban Water Management Plan** (UWMP) in April 2006 (City of Folsom 2006). The UWMP provides information on existing and projected water supplies, assesses the reliability of these supplies given a range of hydrologic conditions, identifies the various customer types and their existing and projected demands, and provides a variety of water management strategies to reduce demand and conserve water resources. Although the project area is not in the City of Folsom, it is in the City's water service area; water demands from the project were not considered in the 2005 UWMP.

The City of Folsom signed the January 2000 **Water Forum Agreement**, a nonbinding memorandum of understanding (MOU) with two coequal objectives: 1) to provide a reliable and safe water supply for the region's economic health and planned development to the year 2030; and 2) to preserve the fishery, wildlife, recreational, and aesthetic values of the Lower American River. The MOU includes a Purveyor Specific Agreement (PSA) for the City that identifies actions for achieving reductions in surface water diversion in dry years. The PSA acknowledges the City's limited access to groundwater supplies; therefore, the City's actions to reduce surface water diversions in dry years focus on: 1) conservation measures; and 2) agreements with other purveyors to reduce their dry-year use of surface water and increase their use of groundwater in order for the City to continue to divert surface water.

Dry year categories are defined by the unimpaired inflow into Folsom Reservoir from March through November. For inflow ranging from 870,000 acre-feet to 950,000 acre-feet (Stage 1), the City would proportionately reduce its diversion to a maximum of 30,000 acre-feet (e.g., if inflow is 95 percent of the maximum inflow, the City would reduce its diversion to 95 percent of its maximum entitlement of 34,000 acre-feet). For inflow ranging from 650,000 acre-feet to 870,000 acre-feet (Stage 2), the City would divert a maximum of 27,000 acre-feet; for inflow to Folsom Reservoir between 400,000 acre-feet and 650,000 acre-feet (Stage 3), the City would divert a maximum of 22,000 acre-feet. In the driest years (i.e. Conference Years, defined as years when the projected unimpaired inflow to Folsom Reservoir from March through November is less than 400,000 acre-feet), the City would reduce its water rights diversions to 20,000 acre-feet.

In years when the City would reduce its diversion, the Water Forum Agreement proposes agreements whereby other water suppliers would increase groundwater use and make an equivalent amount of surface water available to the City; the agreements necessary for the City to reduce surface water diversions have not yet been executed. The City's PSA also provides that the City will further reduce diversions in the driest years by encouraging additional extraordinary conservation to effectively reduce its diversion to 18,000 acre-feet. The PSA recognizes that in the driest years there may not be sufficient water available to provide all purveyors with the surface water supplies specified in their agreements and also provide the flows to the mouth of the American River. In those years, the City will participate in a conference with other stakeholders on how the available water should be managed, guided by the Conference Year Principles described in the MOU.

The City of Folsom will implement water conservation through its Water Shortage Contingency Plan (**City of Folsom Municipal Code, Chapter 13.26**). Water conservation measures during normal and drought years include a five-stage conservation program: a normal water supply stage, water alert stage, water warning stage, water crisis stage, and water emergency stage. The City manager or designee determines the appropriate stage for implementation and notifies all customers of the conservation measures required to comply with the regulations of the Municipal Code.

The June 2007 **Agreement Between the City of Folsom and Aerojet-General Corporation with Respect to Water Service** defines the terms and conditions regarding City potable and non-potable water service to the Aerojet property, including the proposed Glenborough at Easton, Easton Place, and Westborough at Easton developments. Pursuant to this agreement, the City will provide water service to the project, including the provisions for conservation during dry-year water shortages discussed in the Water Forum Agreement. The City will have right, title, and interest to non-potable groundwater being extracted and treated as part of Aerojet's ongoing groundwater contamination cleanup program and will provide Aerojet an estimated 2,731 acre-feet per year (afy) of this non-potable water for industrial uses. ~~Section 7.5 of the agreement provides that Aerojet will pursue an amendment to its existing agreement with the County regarding rights to this non-potable water, but this amendment has not yet been executed.~~

## 8.2 ENVIRONMENTAL SETTING

### 8.2.1 WATER SUPPLY SOURCE AND RIGHTS

Although the project is located in unincorporated Sacramento County, pursuant to a 1986 agreement, the City of Folsom currently provides water supply to existing Aerojet facilities and would continue to serve the project area. **Water is diverted from Folsom Reservoir at Folsom Dam via the Natoma Pipeline and delivered to the Folsom Prison water treatment plant by the U.S. Bureau of Reclamation and to the** ~~The City diverts surface water from Folsom Reservoir at Folsom Dam for delivery via the Natoma~~

~~Pipeline to the Folsom Prison water treatment plant, the Folsom Water Treatment Plant (FWTP) and the Willow Hill Reservoir by the City of Folsom.~~ Water treated at the City's FWTP is distributed to the City's service areas south of the American River: the Folsom Service Area-West; the Folsom Service Area-East; and the Aerojet property. The San Juan Water District supplies water to the City's Ashland and American River Canyon areas north of the American River because it is a separate water system using San Juan Water District water entitlements. The water supply for these areas is not relevant to this EIR.

The City has rights to 34,000 afy of surface water for diversion from Folsom Reservoir and/or the Folsom South Canal:

- 22,000 afy of pre-1914 appropriative water right for diversion from Folsom Reservoir or the Folsom South Canal;
- 5,000 afy of pre-1914 appropriative water right for diversion from Folsom Reservoir or the Folsom South Canal; and
- 7,000 afy from a Central Valley Project (CVP) contract entitlement for surface water for diversion from Folsom Reservoir.

As described in Section 8.1.2, the volume of surface water that the City may divert under these water supply entitlements would be reduced during dry years. The City's surface water supply under its CVP contract entitlement is subject to dry year reductions; the City would also coordinate with other purveyors regarding reduced surface water availability in driest (Conference) years (see Easton WSA in Appendix H).

Groundwater supply in the City is limited to private use for golf course irrigation and emergency non-potable supply for Intel Corporation; groundwater is not considered a reliable source of potable water. The City does not currently use recycled water, but it is evaluating the potential for such opportunities.

Pursuant to its June 2007 agreement, Aerojet granted the City a conditional right to treated groundwater from two Aerojet Groundwater Extraction and Treatment (GET) facilities. GETs A and B are expected to provide the City with up to 3,250 afy of treated groundwater to meet Aerojet's non-potable industrial demands. These demands, projected to average 2,731 afy, are currently being met from City's surface water entitlements delivered from Folsom Reservoir via the Natoma Pipeline and Willow Hill Reservoir. The City will look for other additional non-potable uses of the GET water, but has not identified any to date.

## 8.2.2 WATER TREATMENT AND DISTRIBUTION

The FWTP is located on East Natoma Street and Randall Drive; water treated at the FWTP is stored and pumped through a system of reservoirs and pumping stations for delivery to the City's West and East Service Area customers. The FWTP has a normal treatment capacity of 40 million gallons per day (mgd), with a maximum capacity of 50 mgd. In 2006, the FWTP treated an estimated 23,804 acre-feet of water for delivery to

the City's service areas. The City of Folsom Utilities Department has stated that ongoing improvements at the FWTP will assure sufficient capacity to serve the project and other planned land uses in the City (Payne 2007).

### 8.2.3 CURRENT WATER DEMAND IN PROJECT AREA

In 2006, the City delivered 2,990 acre-feet of non-potable water to Aerojet from the Willow Hill Reservoir. Non-potable water is currently delivered to Aerojet via the Natomas Ditch, a 30-inch raw water pipeline ~~an unlined canal; future delivery would be provided via pipelines to reduce water losses.~~ The City also delivers approximately 450 afy of potable water to Aerojet via two 12-inch-diameter water pipelines under Folsom Boulevard and Prairie City Road (MacKay and Soms 2005b) to a one million-gallon reservoir located in the northwest portion of the project area at Folsom Boulevard and Alabama Avenue.

### 8.2.4 PROJECTED WATER DEMAND IN CITY'S SERVICE AREA

Water demand is expected to increase until buildout of the City's service area (est. 2010); after buildout, water demand is expected to slightly decrease with the significant decline in water use associated with construction activities. The total demand for the City's East and West service areas is projected to be 27,069 afy in 2030 based on average unit water demand factors applied to City land uses assumed in the 2005 Urban Water Management Plan (excluding the project) (City of Folsom 2006), industrial and other non-potable uses, and estimated unaccounted/lost water. The City's total water demand in 2006 was 27,392 acre-feet, including non-potable industrial water use at Aerojet.

Pursuant to the City's 2007 agreement with Aerojet, the City will meet Aerojet's industrial demands with either treated groundwater from Aerojet GETs A and B or from a new source of water that Aerojet would pay the City to acquire and deliver. Accordingly, the City would no longer supply 2,731 afy from existing City water entitlements to meet Aerojet's non-potable industrial demand. By deducting this 2,731 afy from the 27,069-afy projection of 2030 demands on the City's water system, the net 2030 baseline (pre-project) demand would be 24,338 afy.

## 8.3 IMPACT ANALYSIS

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### 8.3.1 METHODOLOGY

This analysis is based on the Easton WSA (Appendix H). The Easton WSA describes the City's existing sources of supply and system capacity and evaluates the City's ability to meet the project's water supply demand in addition to existing and other planned future uses. This EIR analyzes the environmental impacts of providing water service to the project based on the information provided in the Easton WSA.

Pursuant to Water Code Section 10910, the Easton WSA describes how the City would provide water service to the project area. Water Code Section 10910, subdivision (d)(1), states:

The Assessment required by this section shall include an identification of any existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the proposed project, and a description of the quantities of the water received in prior years by the public water...under the existing water supply entitlements, water rights, or water service contracts.

Pursuant to this statutory direction, the first water supply scenario (Scenario 1) analyzed in the Easton WSA assumed that the Water Forum Agreement would not apply to the City's use of water supply rights. The City made this assumption because: (1) the Water Forum Agreement contemplates that other water suppliers will execute agreements with the City to provide the City supplemental water supplies during dry years in which the City's own diversions would be reduced below 27,000 afy under the Water Forum Agreement; and (2) those agreements with other water suppliers have not yet been executed, although they are being negotiated. In light of these facts, while the City intends to comply with the Water Forum Agreement, Water Code Section 10910 requires the City to assume initially that it would be forced to rely solely on its existing water supply rights as part of the analysis in the project's WSA.

The Easton WSA's initial water supply scenario, therefore, identifies different hydrologic conditions for a normal year, single dry year, and multiple dry years as follows:

#### Scenario 1: Absence of Water Forum Agreement

- Normal year – City has all available water supplies, projected to be 34,981 acre-feet (pre-1914 rights of 27,000 acre-feet plus 5,250 of 7,000 acre-feet of Central Valley Project water plus 2,731 acre-feet of GET water).
- Single dry year – City has full entitlement to pre-1914 rights of 27,000 acre-feet and GET water (2,731 acre-feet), but no Central Valley Project water (projected supplies are 29,731 acre-feet).
- Multiple dry years – City has full entitlement to pre-1914 rights of 27,000 acre-feet and GET water (2,731 acre-feet), and Central Valley Project supplies are available in the third year (projected supplies are 29,731 acre-feet in the first and second years; 34,981 acre-feet in the third year).

While the Easton WSA assumed Scenario 1 as the City's initial water supply scenario, that Assessment also states that the City intends to implement the Water Forum Agreement during the 20-year window that Water Code Section 10910 required the City to analyze in relation to the project. Specifically, Water Code Section 10910, subdivision (c)(3), states:

If the projected water demand associated with the proposed project was not accounted for in the most recent adopted urban water management plan...the water supply assessment for the project shall include a discussion with regard to

whether the public water system's total projected water supplies, available during normal, single dry, and multiple dry water years during a 20-year projection, will meet the projected water demand associated with the proposed project, in addition to existing and planned future uses, including agricultural and manufacturing uses.

Because the City's most reasonable projection of its water supplies over the next 20 years includes an assumption that the Water Forum Agreement will be implemented, the Easton WSA analyzed the following water supply scenario (Scenario 2) in which the Agreement is implemented:

#### Scenario 2: Water Forum Agreement Implemented

- Normal year – City has all available water supplies (projected supplies are 34,981 acre-feet).
- Single dry year – City diversions are limited to 20,000 acre-feet, and agreements are implemented to supply remainder of water supply (assumed to be 7,000 acre-feet); GET water is also available (2,731 acre-feet) (projected supplies are 29,731 acre-feet).
- Multiple dry years – City diversions are limited to 27,000 acre-feet in the first year, 22,000 acre-feet in the second year, and no reduction in the third year; agreements are implemented in the second year to supply an additional 5,000 acre-feet; GET water is also available (2,731 acre-feet) (projected supplies are 29,731 acre-feet in the first and second years and 34,981 acre-feet in the third year).

The Easton WSA determined that, under either Scenario 1 or Scenario 2, the City's water system would be able to satisfy the project's water demands, along with other projected demands, in normal, single dry, and multiple dry years, partly because of the water demand reductions that the City expects to achieve in drier years by implementing its water conservation ordinance (Tully and Young 2007). The Easton WSA documented the City's basis for concluding that its implementation of that ordinance would produce the expected water demand reductions (Tully and Young 2007). Pursuant to Water Code Section 10911(b), the Easton WSA is attached as Appendix H and is incorporated by reference in this document.

#### 8.3.2 CRITERIA FOR DETERMINING SIGNIFICANCE

Adverse impacts related to water supply would be considered significant if the project would:

- Require the construction of new water treatment facilities that would cause significant effects on other resources.
- Create a substantial demand for water supplies that cannot be met by existing or planned water supply entitlements, demand management programs, or facilities.

- Result in substantial indirect environmental effects due to unanticipated diversion of surface water.

### 8.3.3 IMPACTS AND MITIGATION MEASURES

#### 8.3.3.1 PROPOSED PROJECT

WS-1

**Impact WS-1: The project would require construction of new water supply distribution pipelines, which would have minimal effects on the environment, but could increase traffic delays off-site.**

Construction of new water distribution pipelines within the project area would result in minimal adverse effects on the environment. The pipelines would be constructed entirely within the footprint of the proposed roads, buildings, homes, and other development. The development area would be graded in preparation for the development; therefore, impacts associated with water distribution pipeline construction within the footprint of the proposed development would be minimal once the area has been cleared for development. Environmental effects of the development on various resources (e.g., cultural resources and biological resources) are analyzed in other chapters of this EIR. Although the development in its entirety may have significant environmental effects, construction of water distribution pipelines within the development would be considered a minor effect and less than significant.

Additionally, two water distribution mains would be constructed outside the project area along Folsom Boulevard (20-inch water main, 1.8 miles long) and Prairie City Road (18-inch water main, 1 mile long). These mains would be constructed entirely within the right-of-way of existing roadways and would not adversely affect natural or cultural resources. Temporary traffic delays would occur with off-site construction, as discussed in Chapter 11. Minor construction-related emissions would occur during the construction activities (emissions are considered part of Phase I development, as discussed in Chapter 12). However, emissions from off-site water main construction would be minimal in comparison to the entire development and would not likely exceed air quality thresholds. Although most impacts on the environment from off-site water main construction would be minimal, traffic impacts would be significant.

**Significance Level Before Mitigation: Significant.**

*Mitigation Measure WS-1: Implement a Traffic Management Plan to minimize traffic impacts from off-site construction activities along Folsom Boulevard and Prairie City Road.*

Implement Mitigation Measure TC-1.

**Significance Level After Mitigation: Less than significant because implementation of a Traffic Management Plan would ensure minimal traffic impacts, and construction of water distribution pipelines for the project would result in minimal environmental effects.**

WS-2

**Impact WS-2: Project implementation would increase the demand for water supply by 3,343 acre-feet per year, but the City of Folsom would have sufficient water supply to meet the demand.**

Based on the project's proposed land uses, the project would generate a water supply demand of approximately 3,343 afy at buildout in 2030 (Table WS-1; Tully and Young 2007). This is approximately 10 percent of the City of Folsom's total available water supply of 34,981 acre-feet during a normal year. During normal years under both Scenario 1 and 2, the City would have sufficient supplies to meet the projected demands for the City and project, with some surplus of water (estimated at 4,569 acre-feet in 2030). Table WS-1 below reflects this fact.

One point of clarification is necessary in relation to Table WS-1. The table shows the City's water demands and corresponding supplies during normal, single-dry, and multiple dry years. Water demands include all projected uses within the City's service area, including Aerojet's industrial demands. Water supplies include the City's American River water supplies as well as GET water from Aerojet. GET water supplies are estimated to be 3,250 afy. However, the only existing planned use for this water supply is to serve Aerojet's industrial demands, which are projected to be 2,731 afy. Because Aerojet's industrial demands are the only existing use for the GET water, only that portion (2,731 afy) is included in the supply projections. In other words, **Aerojet's industrial demands and the 2,731 afy of available GET water effectively offset one another, so that those demands and that supply do not affect the availability of water for potable use within the City and for the project.** GET water supplies depicted in Table WS-1 equal Aerojet's industrial demands. The remaining 519 afy of GET water are omitted from the supplies reflected in Table WS-1 because the City has not yet identified other potential uses for that water.

During single and multiple dry years under both Scenario 1 and 2, and with the additional demand from the project, the City's 2030 water supply shortfall would increase by approximately 779 acre-feet to a total 2,202 acre-feet. As described in the Easton WSA, the City would declare a water shortage condition and implement temporary conservation strategies in accordance with Municipal Code Chapter 13.26 to conserve water and reduce the demand for surface water diversion (Tully and Young 2007). Without the proposed project, these strategies are required to reduce demand approximately 5 percent (1,423 acre-feet); at buildout of the project, the required demand reduction would increase by about 2 percent, to a total of 7 percent (2,202 acre-feet)<sup>1</sup>.

<sup>1</sup> The City assumes that water use will increase by 5 percent above normal demand in dry years; without this assumed increase, the City would have an adequate supply to meet demand, even in dry years, without the proposed project, but would need to reduce overall dry year demand by 2 percent at buildout of the project.

**Table WS-1  
Project Water Demand Estimate**

Year	Projected Baseline Water Demand			Hydrologic Year Type	Available Water Supply (AFA) <sup>a</sup>		Projected Surplus/ (Shortfall) (AFA)		
	Existing Service Area	Easton Project <sup>b</sup>	Total		Existing Service Area	With Easton Project	Existing Service Area	With Easton Project	
2007	27,394	---	27,394	Normal	32,250	-	4,856	-	
2010	27,756	500	28,256	Normal	32,250	34,981	4,494	6,725	
	29,144	525	29,669	Single Dry	27,000	29,731	2,144	62	
				Multiple Dry	Year 1	27,000	29,731	2,144	62
					Year 2	27,000	29,731	2,144	62
Year 3	32,250	34,981	3,106	5,312					
2015	27,002	1,003	28,005	Normal	32,250	34,981	5,248	6,976	
	28,352	1,053	29,405	Single Dry	27,000	29,731	(1,352)	326	
				Multiple Dry	Year 1	27,000	29,731	(1,352)	326
					Year 2	27,000	29,731	(1,352)	326
Year 3	32,250	34,981	3,898	5,576					
2020	27,069	1,672	29,079	Normal	32,250	34,981	5,181	5,902	
	28,423	1,755	30,178	Single Dry	27,000	29,731	(1,423)	(447)	
				Multiple Dry	Year 1	27,000	29,731	(1,423)	(447)
					Year 2	27,000	29,731	(1,423)	(447)
Year 3	32,250	34,981	3,827	4,803					
2025	27,069	2,507	30,084	Normal	32,250	34,981	5,181	4,897	
	28,423	2,633	31,055	Single Dry	27,000	29,731	(1,423)	(1,324)	
				Multiple Dry	Year 1	27,000	29,731	(1,423)	(1,324)
					Year 2	27,000	29,731	(1,423)	(1,324)
Year 3	32,250	34,981	5,181	3,926					
2030	27,069	3,343	30,412	Normal	32,250	34,981	5,181	4,569	
	28,423	3,510	31,933	Single Dry	27,000	29,731	(1,423)	(2,202)	
				Multiple Dry	Year 1	27,000	29,731	(1,423)	(2,202)
					Year 2	27,000	29,731	(1,423)	(2,202)
Year 3	32,250	34,981	3,827	3,048					

<sup>a</sup> This is the total supply, including surface and GET water. Aeroject demands in 2007 are still being met with raw water from Willow Hill Reservoir; surface water assumes that an average 5,250 afy is available from CVP contract supply.

<sup>b</sup> The demands for Easton Place/Glenborough assume the project begins by 2010 and has 30% of the demand by 2015 and 50% of the demand by 2020.

AFA=Acre-Feet Available

Specific strategies that would be implemented include prohibiting wasteful use of water; confining water use to property limits; prohibiting free-flowing hoses; using recirculation devices on pools, ponds, and artificial lakes; limiting irrigation to three days per week; allowing automatic sprinkling only during off-peak hours; prohibiting street and driveway washing; and serving water only upon request at restaurants. Through mandatory implementation of these strategies, the City would have sufficient water supply to serve the City and project demands during dry years.

Scenario 1 and Scenario 2 described in the Easton WSA differ with respect to the City's ability to successfully negotiate agreements pursuant to the Water Forum Agreement, whereby other area purveyors would use supplemental water sources to reduce total diversions from Folsom Reservoir in dry years, as described under Scenario 2. These agreements would ensure the City has at least 27,000 acre-feet of surface water supplies available, consistent with the pre-1914 rights held by the City.

While the Easton project would add 3,343 acre-feet of currently unplanned demand to the City of Folsom's service obligations by 2030, the City-Aerojet agreement provides the City a new GET water supply of 2,731 acre-feet to meet projected industrial and other non-potable uses at Aerojet that are currently being met by the City from Folsom Reservoir. With its existing water rights and the conveyance of GET water rights to the City under the June 2007 agreement, the City's net water demand would increase by 612 afy. The City would have sufficient water supply to serve the project during normal years and in Year 3 of multiple dry years; the City would need to reduce overall demand an additional 2 percent through its conservation efforts in driest years and Years 1 and 2 of multiple dry years. Because the City would have sufficient water supply to serve the project and its other users, this impact would be less than significant.

**Significance Level Before Mitigation: Less than significant because the City would have sufficient water supply to serve the project and its other users.**

WS-3

**Impact WS-3: Project water demands may adversely affect the Lower American River and Sacramento–San Joaquin Delta.**

As explained in the discussion of Impact WS-2, the project would increase Folsom's net water demand by only 612 afy, with Folsom's water supplies consisting of use of its existing water rights plus conveyance of GET water rights to the Folsom. This small net increase in water demands would have minimal adverse impacts on the Lower American River and Sacramento–San Joaquin Delta. As explained in Impact WS-2, the project's water demands can be met by Folsom's existing water rights, GET water rights, and 2 percent additional conservation during certain dry years, without requiring additional American River diversions. Therefore, impacts on the Lower American River and Sacramento–San Joaquin Delta would be less than significant.

It should be noted that environmental impacts of Folsom's diversions of American River water to serve all of Folsom's water demands were assessed in three previous EIRs:

- Environmental Impact Statement (EIS)/EIR for CVP Water Supply Contracts under Public Law 101-514 (Section 206) (“Fazio Water”; U.S. Bureau of Reclamation [USBR] et al. 1997; SCH# 1993042023)—available at Sacramento County Water Agency, 827 7<sup>th</sup> Street, Room 301, Sacramento, CA 95814.
- EIR for Water Forum Proposal (EDAW and SWRI 1999; SCH# 95082041)—available at Sacramento County Department of Environmental Review and Assessment (DERA) office, 827 7<sup>th</sup> Street, Room 220, Sacramento, CA 95814.
- EIR for City’s Natoma Pipeline Replacement and Folsom Water Treatment Plant Expansion Project (City of Folsom 1998; SCH# 97042005)—available at Folsom Public Works Department, 50 Natomas Street, Folsom, CA 95630.

**Significance Level Before Mitigation: Less than significant because the project’s net increase in water demand can be met with existing supplies and would therefore have minimal impacts on the Lower American River and Sacramento–San Joaquin Delta.**

### *8.3.3.2 LOW DENSITY ALTERNATIVE*

Under the Low Density Alternative, fewer residential units would be developed compared with the project (approximately 3,557 vs. 4,883), but the total square feet for commercial and office uses would remain the same (4,227,400 square feet). The water demand for the Low Density Alternative would be lower than the project’s demand.

This alternative would result similar impacts associated with construction of water supply facilities (Impact WS-1). The City of Folsom would have sufficient water supply to meet the alternative’s demand (Impact WS-2) because the demand would be lower than the project’s. Water demands for this alternative would have reduced impacts on the Lower American River and Sacramento–San Joaquin Delta compared with the project (Impact WS-3).

### *8.3.3.3 MIXED USE ALTERNATIVE*

Under the Mixed Use Alternative, more dwelling units would be developed compared with the project (approximately 5,064 vs. 4,883). This alternative would result in a higher water supply demand than the project; however, the City of Folsom would have sufficient water supply to serve this alternative based on the discussions presented in the Easton WSA (Tully and Young 2007).

This alternative would result similar impacts associated with construction of water supply facilities (Impact WS-1). The City of Folsom would have sufficient water supply to meet the alternative’s demand (Impact WS-2) although the demand would be slightly increased. Water demands for this alternative would have slightly increased impacts on the Lower American River and Sacramento–San Joaquin Delta compared with the project (Impact WS-3).

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#### 8.3.3.4 *BIOLOGICALLY SENSITIVE ALTERNATIVE*

Under the Biologically Sensitive Alternative, fewer dwelling units would be developed compared with the project (approximately 4,432 vs. 4,883). This alternative would result in a lower water demand than the project, and impacts would be the same as the Low Density Alternative.

#### 8.3.3.5 *NO PROJECT ALTERNATIVE*

Under the No Project Alternative, the project area would be developed for industrial and office/commercial uses. Square footage devoted to these uses would be substantially greater than the project's office/commercial square footage (10,225,340 vs. 4,227,400); however, no residential or related uses would be constructed. It is assumed that water supply lines similar to the project's would be required to deliver water to the project area, resulting in similar construction impacts (Impact WS-1). This alternative could result in a greater non-potable demand than the project or under existing conditions, but the potable demand would likely be lower than the project unless water-intensive uses are developed. The City of Folsom may not have sufficient water supplies to serve the increased industrial uses due to a limited supply of non-potable water (limited to GET facilities) (Impact WS-2). Development under the No Project Alternative requiring water supply beyond the Aerojet properties' projected demand of 2,731 acre-feet would require additional analysis to determine a source and assess impacts of the source (Impact WS-3).

#### 8.3.4 SIGNIFICANT AND UNAVOIDABLE IMPACTS

No significant and unavoidable impacts were identified for water supply.

