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Addendum to Final Environmental Impact Report
City of Healdsburg Wastewater Treatment Plan Upgrade/
Seasonal Irrigation Reuse Project

City of Healdsburg Public Works Department
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I. INTRODUCTION

In 2005, the City of Healdsburg ("City") certified the final Environmental Impact Report ("2005 EIR") for its Wastewater Treatment Plant ("WWTP") Upgrade Project ("Project"). A component of the Project analyzed in the 2005 EIR was a proposal to beneficially reuse water recycled from the WWTP to meet seasonal irrigation demands in urban and agricultural areas. More specifically, the 2005 EIR studied the potential impacts of seasonal irrigation reuse of recycled water on up to 1,350 acres of land in the rough vicinity of the WWTP. The City concluded that the Project, including the seasonal irrigation reuse component, would not result in any significant, unavoidable environmental impacts.

This Addendum has been prepared pursuant to the California Environmental Quality Act ("CEQA"), to address a proposed modification to the Project: an expansion of the agricultural areas to which recycled water may be applied for seasonal agricultural irrigation to include the Alexander, Dry Creek, and Russian River Valleys.

II. NEED FOR THE PROPOSED MODIFICATION

Persistent, severe drought conditions in California have dramatically impacted regional water supplies. Agricultural water users in and around the City are facing the prospect that water supplies for agricultural irrigation will be critically short during the 2014 and 2015 irrigation seasons. The looming shortage threatens millions of dollars in investments in local vineyards and orchards: vineyards and orchards cannot be fallowed, and so if they cannot be irrigated, they are at risk of being completely lost. In turn, the loss of permanent crops, such as vineyards, poses a risk of additional detrimental effects over the long term: potentially including (i) abandonment of agricultural land or permanent conversion of agricultural land to other purposes, (ii) consequential air quality impacts (*i.e.*, increased dust) resulting from the lack of irrigation, (iii) impacts associated with removal of dead permanent crops (*i.e.*, the use of heavy equipment and potential disruption of useful habitat), (iv) increased unemployment and associated economic impacts, and (v) a reduced local economic base due to lost agricultural production.

Despite the fact that the use of highly efficient irrigation systems has increased over time, the risk of the loss of local permanent crops due to short water supplies is high, and so it is crucial for local growers to have access to supplemental water

supplies. If growers cannot obtain water from purveyors like the City, they may resort to other options such as increased groundwater pumping, which could result in lowered groundwater levels, increased land subsidence, and adverse changes to groundwater quality. By supplying recycled water to local growers on a temporary basis, the City can help avoid the need for growers to obtain water from other, potentially sensitive sources, and also reduce the risk of the loss of permanent local crops and the detrimental effects such losses would produce.

III. PROPOSED CHANGE

The 2005 EIR addressed the impacts of beneficially reusing recycled water for seasonal agricultural irrigation on up to 1,350 acres. The City proposes to modify the Project to allow recycled water to be used for seasonal agricultural irrigation on up to an additional 25,000 acres during the 2014 and 2015 irrigation seasons. As recycled water cannot be delivered to all of the additional areas by pipeline, trucks will be used to deliver recycled water to some of the additional areas. In sum, there are two components of the proposed modification: (1) increasing the number of acres to which recycled water can be applied for irrigation during the 2014 and 2015 irrigation seasons, and (2) the use of trucks to deliver some recycled water for irrigation.

The additional areas covered by the proposal are essentially identical in character to the areas studied in the 2005 EIR. The USDA Web Soil Survey¹ shows that soil conditions in the additional areas are the consistent with those in the areas covered by the 2005 EIR. Accordingly, the drainage characteristics of the additional areas are also consistent with the areas covered by the 2005 EIR. As the additional areas are currently used for irrigated agriculture, the modification will not result in an increase in irrigated acreage, but will in effect maintain a status quo that has existed for many years.

The proposed modification will not require a new water right because the water to be delivered will come from the WWTP. And, as with the previously-approved seasonal reuse of recycled water for agricultural irrigation, under the modified Project recycled water would be made available on a voluntary basis to willing users: no growers will be forced to accept recycled water for irrigation. As noted above, under the proposed modification the additional areas will only be able to receive recycled water for irrigation during the 2014 and 2015 irrigation seasons.

¹ See <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>.

Recycled water cannot be delivered to all of the additional areas by pipeline. In the areas where pipeline service is not available, recycled water may be delivered by truck. The number of truck trips that will be needed to deliver water by truck is not expected to exceed 10-15 per day. Even with these additional truck trips, the total number of truck trips will remain within the normal range of agricultural operations in the area.

IV. CONSIDERATION OF POTENTIAL IMPACTS OF THE PROPOSED CHANGE

Under Public Resources Code section 21166 and section 15162 of the CEQA Guidelines, when an EIR has been certified for a project, a subsequent or supplemental EIR for that project is not required unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the 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 the project will have impacts not discussed in the previous EIR or that will be substantially more severe than shown in the previous EIR, or that feasible mitigation measures are available to reduce one or more significant effects of the project.

These conditions are addressed in turn below.

- 1) The City has considered the scope of the proposed modification to the Project, as well as the potential environmental effects the proposed modification may produce.

The City concludes that the modification does not involve “substantial” changes to the Project and will not involve new significant environmental effects or a substantial increase in the severity of any previously identified environmental effects.

The proposed modification involves the same type of activity – application of recycled water for seasonal irrigation – as the existing Project, and the use of trucks to deliver water to some of the additional areas will be consistent with existing agricultural activities that have occurred on those properties for many years. The modification will be temporary, and application of recycled water for irrigation will be on a voluntary basis. No new water right is required to accomplish the modification. In light of these facts, the City finds that neither the application of recycled water for seasonal irrigation to additional areas, nor the use of trucks to deliver water to some of the additional areas, nor both of those components together, constitute a “substantial” change in the Project.

Even if the proposed modification constituted a “substantial” change, it will not involve new significant environmental effects. Application of water to additional areas will not produce new environmental effects, because the soils and drainage characteristics of the additional areas are similar to the areas addressed in the 2005 EIR. Even if the application of recycled waters to additional areas could produce new environmental effects, the City finds that any potential new effects will not be significant because the modification is only for two irrigation seasons, recycled water will only be applied to the additional areas on a seasonal basis, at agronomic rates, and the additional areas have been irrigated on a seasonal basis for many years – the modification will only change the source of the water used for irrigation on those properties. Similarly, while the use of trucks to deliver recycled water to the additional areas may produce a “new” environmental effect, the City finds that this effect will not be significant, because the number of truck trips will be small, the use of trucks will be seasonal, the modification will only be for two irrigation seasons, and the use of trucks for this agricultural purpose is consistent with the existing uses of the additional areas.

For the same reasons, the City finds that proposed modification will not substantially increase the severity of any of the environmental effects identified in the 2005 EIR.

2) There has been no substantial change with respect to the circumstances under which the Project is undertaken that requires major revision to the 2005 EIR due to new or increased significant environmental effects. Even if the current drought conditions constitute a “substantial change” in the circumstances of the Project, the impacts of the Project have not changed or increased due to the drought conditions. Thus, the drought conditions do not affect the analysis of the 2005 EIR regarding the effects of the Project.

3) Finally, there is no new information before the City regarding the Project that was not known and could not have been known with the exercise of reasonable diligence at the time the 2005 EIR was certified.

V. REGIONAL BOARD PROCESS

The City will seek authorization for the proposed modification from the North Coast Regional Water Quality Control Board (“RWQCB”) consistent with existing permit requirements. This Addendum may be used to support the authorization process. The City also intends to pursue an amended RWQCB permit to authorize additional, long-term expansion of recycled water use. The City will consider its obligations under CEQA with respect to the longer-term expansion at the appropriate time. While the proposed modification will not result in any new or increased significant environmental impacts, and any longer-term expansion is not expected to result in any such impacts, the RWQCB processes will provide for an additional layer of regulatory review regarding any future Project modifications.

VI. CONCLUSION

There is no substantial evidence showing that any of the conditions set forth in section 21166 of the Public Resources Code or section 15162 of the CEQA Guidelines are present: instead, substantial evidence demonstrates that none of those conditions are present. The City therefore finds that it is not required to prepare a subsequent or supplemental EIR for the proposed modification to the Project. Accordingly, the City has caused this Addendum for the proposed modification to be prepared in compliance with section 15164 of the CEQA Guidelines, and will consider this Addendum with the 2005 EIR prior to making a decision on the proposed modification.