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

City of Healdsburg Utilities 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.

In 2014, the City prepared an addendum to the 2005 EIR ("2014 Addendum") to cover a proposed minor modification of the Project: expansion of the agricultural areas to which recycled water could be applied for seasonal agricultural irrigation during the 2014 and 2015 irrigation seasons. Under the 2014 Addendum, the City was permitted to deliver recycled water to up to 25,000 acres within a larger approximately 100,000-acre area comprising the Alexander, Dry Creek, and Russian River Valleys, and recycled water could be trucked to its place of use.

This Addendum has been prepared to address a nearly identical proposed minor modification to the Project as addressed in the 2014 Addendum, but for the 2016-2020 irrigation seasons.

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, who have already dealt with years of drought, face the prospect that water supplies for agricultural irrigation will be critically short once again during the 2016 irrigation seasons, and potentially beyond. The need for the current proposal is thus at least as great, if not even greater, than the need for the modification that was the subject of the 2014 Addendum. Water shortages have threatened 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 still high, and so it continues to be crucial for local growers to have access to a consistent and reliable supply of water. 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, adverse changes to groundwater quality, and potential secondary impacts to surface waters. By supplying recycled water to local growers, 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 reduce 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 approximately 1,350 acres. The 2014 Addendum covered a modification that allowed recycled water to be used for seasonal agricultural irrigation on up to an additional 25,000 acres (located within the larger 100,000-acre area comprising the Alexander, Dry Creek, and Russian River Valleys) during the 2014 and 2015 irrigation seasons, with the use of trucks to haul water for irrigation permitted.

The City now proposes a modification nearly identical to that covered by the 2014 Addendum. Under the proposal, the City will again be allowed to deliver recycled water for seasonal agricultural irrigation on up to 25,000 acres. The 25,000 acres that may be supplied with recycled water under the proposal must be located in an approximately 100,000-acre area comprising the Alexander, Dry Creek, and Russian River Valleys and an additional approximately 1,500 acres just outside the boundaries of the three Valleys. Hauling of water by truck will again be permitted, but in addition the City will construct pipeline extension to provide for piped delivery of water to 600 of the 25,000 acres that are eligible for recycled water, and potentially engaging more

lands. The pipeline would be approximately 2.5 miles initially. As more suitable irrigation water users become identified, the pipeline may extend as long as 6 miles to provide recycled water to additional lands.

Like the proposal covered by the 2014 Addendum, this proposal is temporary, but covers a five-year period instead of a two-year period. The City is requesting a five-year period instead of a two-year period in an effort to ensure that the modification remain in effect until the drought is over and water storage levels have fully recovered. In 2014, it appeared that a two-year expansion would see the City and its growers through the drought, but as the 2015-2016 El Niño appears weakening than expected (the City's rainfall total February 2016 was less than 1.00 inch), that hope has been proven wrong. The City believes that 2016 will be yet another drought year, and is concerned that this pattern of dry years will continue even beyond 2016.

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 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 only difference is that the water being used for irrigation will come from the WWTP, rather than other sources.

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 2016-2020 irrigation seasons.

An extension of an existing 16-inch pipeline is proposed to provide for delivery of recycled water to 600 of the 25,000 eligible acres. The extension will be initially

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

approximately 2.5 miles long (potentially up to approximately 6 miles) and will be located almost entirely under and along existing dirt roads located primarily within the vineyards on private property. Recycled water cannot be delivered to all of the additional areas by pipeline. In the areas where pipeline service is not feasible, 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 significant 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. Extension of the pipeline is also consistent with the agricultural character of the surrounding property, is desired by the underlying property owners, and is relatively minor in the broader context of the City’s efforts to expand delivery of recycled water for irrigation reuse. The modification will be temporary and essentially identical to the modification covered by the 2014 Addendum (with the exception of the pipeline), 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 individual components of the proposal, or any combination of those components, constitute a “substantial” change in the Project.

The proposed modification 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 five 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 five irrigation seasons, and the use of trucks for this agricultural purpose is consistent with the existing uses of the additional areas.

Finally, while the extension of the pipeline may also produce “new” environmental effects, the City also finds that such effects will not be significant because the pipe will be constructed in dirt roads that are already heavily disturbed and virtually devoid of any vegetation, the digging and dust production associated with installation of the pipeline will be in character with the agricultural nature of the property and the existing effects of agricultural activities at the same location, and because the impacts of construction will be temporary in nature, occurring only during the actual installation of the pipe. There will be no significant traffic impacts because the dirt roads in which the pipe will be installed are private roads, and the owners of those roads are not only aware of the City’s proposal, but desire it, and so will not be adversely affected by the construction work. Although the pipeline will cross Storey Creek (an ephemeral stream that is dry much of the year and is in fact dry as of February 16, 2016), installation of the crossing will be done during the dry season, is expected to take no more than four days to complete, and will be done in compliance with the terms and conditions of a required Streambed Alteration Agreement, which would be designed to protect fish and wildlife resources from adverse impacts.

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 continued drought conditions constitute a “substantial change” in the circumstances of the Project, the impacts of the Project have not substantially 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. REGULATORY PROCESS

The City will seek authorization for the proposed modification from the North Coast Regional Water Quality Control Board ("NCRWQCB") through the State General Order for Recycled Water Use. This Addendum is necessary to support the authorization process. The City is also considering formulation of a proposal to permanently expand the areas to which its recycled water may be applied for agricultural irrigation, and will conduct additional CEQA review for that proposal when appropriate. The Streambed Alteration Agreement may contain additional measures designed to prevent any adverse impacts to fish and wildlife resources. While the proposed Project 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, these additional regulatory processes will provide for an additional layer of review regarding the proposed modification and 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.