

Final Subsequent Environmental Impact Report  
City of Healdsburg  
Wastewater Treatment Plant Upgrade Project



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October 2019

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City of Healdsburg  
Wastewater Treatment Plant Upgrade Project



Prepared for:  
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## ACRONYMS AND ABBREVIATIONS

BMPs	Best Management Practices
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of Healdsburg
EIR	Environmental Impact Report
FEIR	Final Environmental Impact Report
MG	million gallons
NAGPRA	Native American Graves Protection and Repatriation Act
NOA	Notice of Availability
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
RWQCB	North Coast Regional Water Quality Control Board
SEIR	Subsequent Environmental Impact Report
THPO	Tribal Heritage Preservation Officer
VOH	Valley Oak Habitat
WRF	Water Reclamation Facility

# 1 INTRODUCTION

## 1.1 OVERVIEW

The City of Healdsburg Wastewater Treatment Upgrade Project Environmental Impact Report was certified in 2005 and addressed separate options for the City of Healdsburg (City) Water Reclamation Facility (WRF) upgrade, effluent disposal, and seasonal irrigation with recycled water. In 2014 and 2016, the City prepared addenda to the 2005 Environmental Impact Report (EIR) that considered delivery via haul trucks and pipelines of recycled water for seasonal irrigation of up to 25,000 additional acres of agricultural land within an area of approximately 103,000 acres. In 2019, a Draft Subsequent Environmental Impact Report (SEIR) was prepared and circulated for public review to address the City's proposed expansion of the recycled water program, including additional proposed recycled water facilities and expanded areas of operations.

In accordance with California Environmental Quality Act Guidelines (State CEQA Guidelines) Section 15205(d), a 45-day review period was provided on the Draft SEIR that began on August 1, 2019, and ended on September 16, 2019. In addition, and as allowed by Section 15202 of the guidelines, a public meeting was held on August 19, 2019 at the Healdsburg City Council to receive oral comments on the Draft SEIR.

In accordance with the City of Healdsburg Local Guidelines and California Environmental Quality Act (CEQA) Guidelines Sections 15088, 15089, and 15132, the City of Healdsburg has prepared the Final Environmental Impact Report (FEIR) for the project. Pursuant to CEQA requirements, the City of Healdsburg must certify the FEIR as complete and adequate prior to approval of the proposed project.

Per CEQA Guidelines Section 15132, the FEIR shall be comprised of the following:

- a) The Draft EIR or revisions of the Draft.
- b) Comments and recommendations received on the Draft EIR, either verbatim or in summary.
- c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- e) Any other information added by the Lead Agency.

As specified in Section 15088(b) of the State CEQA Guidelines, the focus of the responses to comments is on the disposition of significant environmental issues. Detailed responses are not required on comments regarding the merits of the proposed project that are unrelated to potential adverse environmental effects. This document presents responses to the comments received on the Draft SEIR and has been prepared in accordance with Sections 15089 and 15132 of the State CEQA Guidelines. It is divided into three chapters:

- Chapter 1, "Introduction," includes a summary of the proposed project and alternatives.
- Chapter 2, "Agencies and Individuals Commenting on the Draft SEIR," provides copies of all comments received on the Draft EIR, and presents responses to those comments.

- Chapter 3, “Revisions to the Draft SEIR,” identifies changes made to the Draft SEIR in response to the comments.

This document and the Draft SEIR together make up the Final SEIR. The Draft SEIR is hereby incorporated into this document by reference

## 1.2 PUBLIC PARTICIPATION

Pursuant to CEQA, the City published a Notice of Preparation (NOP) on August 1, 2018, describing the proposed project, the project background, and the probable environmental impacts. The public review period for the NOP was August 1–31, 2018. The August 2018 NOP indicated that a Supplemental EIR would be prepared, consistent with Section 15163 of the State CEQA Guidelines. A scoping meeting was held on August 21, 2018, to solicit stakeholder feedback on the CEQA process.

Based on stakeholder input received during the August 2018 NOP process, and on internal deliberations, the City decided to prepare a more comprehensive Subsequent EIR, consistent with State CEQA Guidelines Section 15162. As a result, a second NOP was published on February 5, 2019, stating that an SEIR would be prepared to address the proposed expansion of the recycled water program. This NOP also refined the project description to clarify the potentially affected project acreage and include the proposal to permanently extend the recycled-water truck hauling activities, which are currently authorized through the end of 2020. The public review period for this NOP was February 6 through March 8, 2019.

On August 1, 2019, the City of Healdsburg released a Notice of Availability (NOA) for the Draft SEIR. The NOA announced a 45-day comment period on the Draft SEIR extending from August 1, 2019 until September 16, 2018. The public comment period provided an opportunity for interested parties to provide input regarding the adequacy of the environmental document. On August 19, 2019, the Draft SEIR was considered at a public meeting before the City Council. No comments were received at that meeting from the public or members of the City Council. During the 45-day comment period, two letters were received on the Draft SEIR; a third comment letter was received after the public review period ended. All three letters are included in Chapter 2 of this document.

No substantial revisions that would merit recirculation of the Draft SEIR as defined by CEQA Guidelines Section 15088.5(b) were made to the project or analyses after public comment. All comments received from the public, interested parties, and decision makers on the Draft SEIR are identified herein (Chapter 2).

## 1.3 FINAL SEIR PROCESS

The Final SEIR is presented to the City Council for consideration prior to taking action on the proposed project. Before the City Council can take action on the proposed project, the decision makers must certify that the information presented in the Final SEIR has been reviewed and considered, that the SEIR has been completed in a manner that conforms with the requirements of CEQA, and that the City’s independent judgment pursuant to CEQA Guidelines Section 15090 is adequately reflected.

In accordance with Section 21002, 21002.1 and 21081 of the Public Resources Code and CEQA Guidelines Sections 15091 and 15093, no public agency shall approve or carry out a project for

which an EIR has been certified which identifies one or more significant effects unless one or more of the following findings are made:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the Final SEIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other consideration including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final SEIR.

When a lead agency approves a project that will result in the occurrence of significant effects that cannot be avoided or substantially lessened, the agency shall state reasons to support the action in a "statement of overriding considerations" that is supported by substantial evidence in the record. However, no significant and avoidable impacts have been identified in this SEIR.

## **1.4 SUMMARY DESCRIPTION OF THE PROPOSED PROJECT**

The proposed project includes both specific projects and programmatic components. The project-level analysis in this SEIR addresses the following facilities and features proposed for the 2018 Proposed Area:

- add approximately 1,160 acres that could receive recycled water via the proposed new pipelines (2018 Proposed Area);
- extend the existing recycled water transmission pipelines along two alignments totaling approximately 6,000 linear feet;
- construct a recycled water distribution system in the 2018 Proposed Area to irrigate approximately 150 acres of pasture lands and 40 acres of vineyards.

The following components are addressed programmatically in the analysis in this SEIR:

- Permit an additional 3,540 acres of land to receive recycled water at a future date (2018 Program Expansion Area).
- Make permanent the temporary program permitting application of recycled water via truck delivery on approximately 25,000 acres.
- To serve additional future water users in the 2018 Program Expansion Area, a 12-inch-diameter pipeline could be extended a maximum of approximately 3.5 miles.

Common to the 2018 Proposed Area, 2018 Program Expansion Area, and recycled water haul area, the project would expand the list of recycled water uses to include:

- orchards (apple, peach, plum/prune);
- cannabis;

- irrigated pasture;
- direct livestock watering (not including dairy cows);
- frost protection; and
- other agricultural uses occurring near the wastewater treatment plant, consistent with Title 22 of the California Code of Regulations.

The City of Healdsburg's Water Reclamation Facility (WRF) operates under a National Pollutant Discharge Elimination System (NPDES) permit administered by the North Coast Regional Water Quality Control Board (RWQCB). The NPDES permit prohibits discharge to the Russian River from May 15 to September 30. Currently, the City can only store approximately 25 million gallons (MIG), or 17 percent of the approximately 138 million gallons of water reclaimed during the prohibition period. The City is now planning to expand its recycled water system facilities and activities to meet the North Coast RWQCB discharge prohibition. The expanded recycled water activities and construction and operation of the associated facilities are the subject of the SEIR.

## 1.5 PROJECT ALTERNATIVES

The Draft SEIR evaluated two alternatives to the project, as listed below, and as described in their entirety in Chapter 5 of the Draft SEIR: (1) No Project Alternative and, (2) Geysers Pipeline Connection Alternative.

## 2 AGENCIES AND INDIVIDUALS COMMENTING ON THE DRAFT SEIR

The following agencies, organizations, and individuals submitted written comments during the 45-day public review period from August 1, 2019 to September 16, 2019.

- Comment No. 1: Elaini Vargas, Tribal Historic Preservation Officer, Kashia Band of Pomo Indians (received September 6, 2019)
- Comment No. 2: Buffy McQuillen, Tribal Heritage Preservation Officer, Federated Indians of Graton Rancheria (received September 9, 2019)
- Comment No. 3: Jim Jordan (received September 19, 2019)

In addition, the State Clearinghouse and Planning Unit of the Governor's Office of Planning and Research provided a letter on September 17, 2019 indicating that no state agencies submitted comments and that the City complied with the State Clearinghouse review requirements for environmental documents pursuant to the CEQA.

The following pages provides copies of the written comments received. Because none of the comments request clarification of the analysis provided in the Draft SEIR or question the conclusions provided therein, no responses to these written comments is warranted.

No verbal comments were made at the public meeting for the Draft SEIR held at the Healdsburg City Council on August 19. Thus, no responses to oral comments are provided in this document.

## 2.1 COMMENT NO. 1

From: [elaini@stewartspoint.org](mailto:elaini@stewartspoint.org) <[elaini@stewartspoint.org](mailto:elaini@stewartspoint.org)>

Sent: Friday, September 6, 2019 10:38 AM

To: Patrick Fuss <[pfuss@ci.healdsburg.ca.us](mailto:pfuss@ci.healdsburg.ca.us)>

Subject: Wastewater Treatment Plant Upgrade Project

Patrick,

Thank you for taking the time to speak with me this morning.

The proposed project area is in the Aboriginal Territory of the Stewarts Point Rancheria Kashia Band of Pomo Indians.

At this time, the Kashia Band of Pomo Indians of the Stewarts Point Rancheria have no concerns. We do reserve the Right to Comment should any Post Review Discoveries be made.

Have a nice weekend,

Elaini Vargas  
Tribal Historic Preservation Officer  
Kashia Band of Pomo Indians  
1420 Guerneville Road, Suite 1  
Santa Rosa, CA 95403  
Email: [elaini@stewartspoint.org](mailto:elaini@stewartspoint.org)  
Office: 707-591-0580 Ext 105

Response: This comment is acknowledged. This comment does not address the adequacy of the SEIR, and no further response is required.

## 2.2 COMMENT NO. 2

From: [THPO@gratonrancheria.com](mailto:THPO@gratonrancheria.com) <[THPO@gratonrancheria.com](mailto:THPO@gratonrancheria.com)>

Sent: Monday, September 9, 2019 8:21 AM

To: Patrick Fuss <[pfuss@ci.healdsburg.ca.us](mailto:pfuss@ci.healdsburg.ca.us)>

Subject: Wastewater Treatment Plant Upgrade Project

Dear Mr. Fuss,

The Federated Indians of Graton Rancheria, a federally recognized Tribe and sovereign government has received your correspondence requesting information on the Wastewater Treatment Plant Upgrade Project. The Tribe has reviewed the location of the project and we have determined it is not in our traditional ancestral territory, therefore have no comments on this project, at this time. We appreciate the opportunity to review the project proposal. If you have any additional questions regarding this letter please feel free to email my office at [thpo@gratonrancheria.com](mailto:thpo@gratonrancheria.com) or call the office at (707) 566-2288.

Buffy McQuillen

Tribal Heritage Preservation Officer (THPO)

Native American Graves Protection and Repatriation Act (NAGPRA)

Office: 707.566.2288; ext. 137

Cell: 707.318.0485

Fax: 707.566.2291

Hector Garcia

THPO Administrative Assistant II

Federated Indians of Graton Rancheria

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Office: 707.566.2288, ext. 138

Fax: 707.588-9809

Email: [hgarcia@gratonrancheria.com](mailto:hgarcia@gratonrancheria.com)

[www.gratonrancheria.com](http://www.gratonrancheria.com)

Response: This comment is acknowledged. This comment does not address the adequacy of the SEIR, and no further response is required.

## 2.3 COMMENT NO. 3

From: Jim Jordan <[jim@greatoakvineyards.com](mailto:jim@greatoakvineyards.com)>  
Date: September 19, 2019 at 3:39:31 PM PDT  
To: Patrick Fuss <[pfuss@ci.healdsburg.ca.us](mailto:pfuss@ci.healdsburg.ca.us)>  
Cc: Sandra Poysa <[sandra@greatoakvineyards.com](mailto:sandra@greatoakvineyards.com)>  
Subject: WRF SEIR

Greetings Patrick,

Thanks for your call earlier this week about the subject document. As I said, I received the August 1 notice of availability and public hearing that was sent to me. I reviewed the project description, the exhibits, and the identified potentially significant environmental impacts. I also noted that the public hearing was set for August 19 and recognized that I would be on travel and unable to attend the meeting. When I got back from my trip late last month I got caught up in other things and overlooked the notice of availability in my stack of library notices.

I did get to the library yesterday afternoon and reviewed the Draft SEIR. As would be expected after all their years of experience, AECOM/URS did a solid job putting the document together. I primarily focused on the Executive Summary and Table with Significant Impacts. I found the impact discussion comprehensive and that it presented a balanced description of potential impacts.

The Draft SEIR is the first time I can recall that "Wildfire" impacts being addressed. Given the recent fires, it seems like a useful disclosure of potential impacts, especially seeing the accompanying exhibit of fire prone areas.

I was also interested in the mitigation measures required to make the identified impacts Less Than Significant. The required mitigation measures appear comprehensive and to incorporate "lessons learned" in the Project Area. It will be interesting to see how they work out during Project construction and operation. I would like to receive a copy of any annual Mitigation Monitoring Reports if they are produced.

Further, I found the discussion of "Alternatives", the "Environmentally Superior Alternative", and "Other CEQA-Required Analyses" informative and agree with the findings. I also found the exhibits informative and leaned about the presence of an endangered manzanita that I was unaware of. To that end, if you have extra copies of the printed version of the document to be discarded/recycled I can volunteer a new home for one as the document contains lots of useful information.

Thanks for giving me an opportunity to review the document after the close of the comment period. I look forward to following the implementation of the Project when it is approved and funded.

Response: This comment is acknowledged. This comment does not address the adequacy of the SEIR, and no further response is required.

### 3 REVISIONS TO THE DRAFT SEIR

In the revised text below, please note that additions are underlined and deletions shown in ~~strikeout~~. In preparing the responses to comments, information was clarified and disclosed including revisions to the Draft SEIR. The City carefully reviewed the information developed through the response to comments process and determined that it does not constitute "significant new information" for the purposes of CEQA Guidelines Section 15088.5 and no recirculation of a revised Draft SEIR is warranted. Consistent with CEQA Guidelines, the additional information below clarifies the information and analysis in the Draft SEIR.

Page 3.4-38 of the Draft SEIR is revised as follows:

#### S3.4-1: AVOID SIGNIFICANT IMPACTS ON SPECIAL-STATUS PLANTS

Conduct focused-surveys for special-status plants at all areas subject to disturbance during construction.

If no special-status plants are found during focused surveys, the findings will be documented in a letter report to the City of Healdsburg, and no further mitigation would be required.

If special-status plants are found during focused surveys in the areas where pipelines will be installed, they should be avoided during construction. If impacts to special-status plant species can be avoided during construction, avoidance zones shall be included in construction drawings and the methods should be documented in a letter report to the City of Healdsburg. Locations of special-status plant populations shall be clearly identified in the field for avoidance by staking or flagging before construction. No project activity would occur in the marked areas. If special-status plants are found in areas to be irrigated at the dairy/vineyard property, the areas supporting the plants plus a 100 foot buffer zone shall be excluded from the area to be irrigated to avoid adverse effects on the plants from exposure to excessive moisture.

Pages 3.4-49 to 3.4-50 of the Draft SEIR is revised as follows:

#### S3.4-9: PROTECT VALLEY OAK WOODLAND SENSITIVE NATURAL COMMUNITY IN THE ~~DAIRY~~VINEYARD PROPERTY RECYCLED WATER PIPELINE EXTENSION AND SIR DISTRIBUTION SYSTEM

The City and its construction contractor shall avoid and minimize impacts on valley oak woodland that occurs outside of the Sonoma County Valley Oak Habitat (VOH) Combining District to the greatest extent feasible.

Before the start of any construction activity, the City and its construction contractor shall protect the valley oak woodland sensitive natural community in and adjacent to the eastern extent of the proposed 12-inch recycled water pipeline extension and the entire dairyvineyard property distribution system by implementing the following measures:

- Assign a qualified biologist to flag or fence valley oak woodland to clearly delineate the extent of construction. All crews will be provided a set of drawings showing the locations of valley oak woodland in and near the work area.
- Develop a worker environmental awareness program (introduced in Mitigation Measure S3.4-3a4, "Avoid and Minimize Impacts on Special-Status Amphibians and Reptiles"), subject to review and approval by the City of Healdsburg in consultation with California Department of Fish and Wildlife (CDFW), to include specific information regarding the valley oak woodland sensitive natural community that occurs on the project site and that either would be affected or has been identified for avoidance; the locations and extent of the sensitive natural community; and methods of resource avoidance.

If impacts on valley oak woodland sensitive natural community cannot be avoided, then the City and its construction contractor shall compensate for any loss or damage to valley oak or other native trees within the valley oak woodland sensitive natural community (e.g., coast live oak) by implementing the mitigation measures outlined in Mitigation Measure S3.4-7, "Implement Requirements of the Protect Trees Subject to Sonoma County Valley Oak Combining District" for all native tree species affected.