



CITY OF HEALDSBURG CITY COUNCIL AGENDA STAFF REPORT

MEETING DATE: March 21, 2016

SUBJECT: Addendum to the 2005 FEIR for the Healdsburg Wastewater Treatment Plant Upgrade/Seasonal Irrigation Reuse Project

PREPARED BY: Patrick Fuss, Water/Wastewater Engineer

STRATEGIC INITIATIVE(S):
Infrastructure & Facilities

RECOMMENDED ACTION(S):

After consideration of an addendum to the Wastewater Treatment Plant 2005 FEIR, adopt a resolution modifying Healdsburg's Wastewater Treatment Plant Upgrade/Seasonal Irrigation Reuse Project

BACKGROUND:

The City of Healdsburg operates an advanced wastewater treatment plant under a permit administered by the State of California's North Coast Regional Water Quality Control Board ("NCRWQCB"). The NCRWQCB adopted the *Water Quality Control Plan for the North Coast Region* (the "Basin Plan") with the intent to protect the waters of the North Coast. One of the goals of the Basin Plan is to prevent the discharge of "waste" to specific North Coastal basins. For the City of Healdsburg, NCRWQCB enacted a seasonal prohibition of discharge to the Russian River and its tributaries, and required that the City provide advanced wastewater treatment.

The seasonal prohibition requires that the City of Healdsburg develop beneficial uses for the City's tertiary-treated disinfected recycled water with the ultimate goal of eliminating discharges of "waste" from May 15 to September 30. Additionally the Basin Plan requires that "discharges of municipal waste during October 1 through May 14 be of advanced treated wastewater". To comply with these requirements, the City upgraded its wastewater treatment plant to provide high quality tertiary (i.e., advanced)-treated disinfected wastewater.

In order to accomplish the goal of compliance with the discharge prohibition requirement, the City has invested in a distribution system to convey recycled water to the end users. The City has also promoted the use of recycled water in its Recycled Water Program (Program). The primary uses for which recycled water has been promoted and used include dust control, vineyard

irrigation, and, to a small extent, urban irrigation.

In 2014, the first year the City was approved to provide recycled water, the Program avoided the discharge of 6 million gallons to the Russian River. In 2015, the Program avoided the discharge of 10 million gallons to the Russian River. While the volume recycled not discharged is increasing, it falls short of the approximately 138 million gallons that the City needs to eliminate from the seasonal prohibition discharges.

The original design of the Recycled Water Program that was included in the approved 2005 Final Environmental Impact Report ("2005 FEIR"), expected that approximately 1,350 acres of vineyards and urban turf irrigation would be needed to meet the discharge prohibition. With a better understanding of the actual, efficient irrigation practices of the vineyards, expansion of the Program to include over 2,000 acres of vineyards is required.

Currently several vineyard owners and managers outside the area approved in the 2005 FEIR have requested the City's recycled water. As vineyard irrigation is one of the lowest costs options for expanding the City's recycled water program and these vineyards are willing participants, the approved area for irrigation should expand to include them.

DISCUSSION/ANALYSIS:

As mentioned, City staff has been approached by vineyard managers to the south of the City's Water Reclamation facility (WRF). The vineyard managers are interested in receiving the recycled water for vineyard irrigation. Ordinarily, the vineyards are irrigated with ground water under State water rights permits. However, the ongoing drought and potential for curtailment of the water rights has made the vineyard managers' need for reliable water sources particularly acute. The City's tertiary-treated recycled water presents a reliable, consistent, and safe source of water. Per Title 22 Section 13550, use of the recycled water by the vineyards will not diminish their water rights. The vineyard managers are eager for the water and willing to participate in the process to supply it.

The most efficient and effective way to deliver recycled water to the vineyards is through a pipeline. Currently, the recycled water pipeline extends approximately 6,000 feet south through Syar Vineyards, making the recycled water available to approximately 100 acres, and approximately 6,000 feet north through Ferrai-Carano and others vineyards, making recycled water available to another approximately 290 acres.

Vineyards to the south interested in the recycled water include Ferrari-Carano, Salisbury and Gallo. Collectively they would add approximately 600 acres of additional vineyard acreage. Together these vineyard operations would bring the water recycled usage up from approximately 10 million gallons to a projected 37 million gallons for vineyard irrigation (assuming average application rates). Depending on how the vineyards are irrigated, this could increase the recycled water from approximately 7 % of goal, to approximately 26% of 138 million gallon goal.

To reach the additional vineyards to the south, the existing recycled water pipeline will need to be extended by approximately 11,000 feet. The pipeline will cross Storey Creek, a seasonally flowing stream. Crossing of Storey Creek may require a Streambed Alteration Agreement with

the California Department of Fish and Wildlife. However, it is anticipated that environmental permits with the Army Corps of Engineers and other agencies are not required. It is anticipated that the stream will not be disturbed by the work to bring recycled water to the other side.

ALTERNATIVES:

As an alternative, the City Council could direct staff to extend the pipeline into and throughout the City for urban irrigation uses. The 2005 FEIR contemplates urban reuse for specific public areas within the City's boundaries. However, getting to these areas is more expensive (\$9 million to \$12 million for the completed project) than the proposed agricultural irrigation, and by itself, urban reuse does not consume enough water to comply with the seasonal zero discharge requirements.

As another alternative the City Council could direct staff to focus on the areas of agricultural irrigation already approved by the 2005 FEIR. To do so, City staff would likely need to build a robust marketing program to generate interest and participation in the lands to the north and west of the treatment facility. Over the past several years, City staff has not seen a large or active interest for the use of recycled water in these areas. Due to the limited interest, as opposed to the persistent and widespread interest to the south, staff does not recommend pursuing this alternative as it will likely not gain equivalent results as focusing on the lands to the south.

Currently the State Board is investigating the indirect and direct potable reuse of recycled water. Before the end of 2016 the State Board will present recommendations to allow indirect and direct potable reuse. These new recommendations in all likelihood will allow the City new options, potentially lower cost options, to achieve zero discharge of waste. Therefore, staff does not recommend pursuing urban irrigation at this time due to the expense and uncertainty surrounding the State's policies regarding recycled water and particularly indirect reuse.

FISCAL IMPACT:

There is no direct fiscal impact related to the approval of the addendum.

ENVIRONMENTAL ANALYSIS:

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.

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 in additional areas will be consistent with existing agricultural activities that have occurred on those properties for many years. The 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 constitutes 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 FEIR. 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 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.

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

ATTACHMENT(S):

Resolution

Addendum to Final EIR