City of Healdsburg
Findings of Fact
Regarding Environmental Impacts, Mitigation Measures, Alternatives and Overriding Considerations for the Expansion of the Recycled Water Program

Pursuant to Title 14 of the California Code of Regulations ("CEQA Guidelines") Section 15091, and the City of Healdsburg's CEQA Implementation Procedures, the City Council makes the following findings in support of the approval of the expansion of the recycled water program (hereafter "the project"), as addressed in the Subsequent Environmental Impact Report (SEIR) for the City of Healdsburg Wastewater Treatment Plant Upgrade Project. The SEIR and other supporting documentation outlined in the record of proceedings provide the basis for these findings and are incorporated herein by reference.

1 INTRODUCTION

An environmental impact report (EIR) for the City of Healdsburg Wastewater Treatment Upgrade Project was prepared in 2005 (City of Healdsburg 2005) and certified on June 13, 2005 (State Clearinghouse #2002072083) that addressed separate options for the City's proposed Water Reclamation Facility (WRF) upgrade, effluent disposal, and seasonal irrigation with recycled water. In 2014 and 2016, the City prepared addenda to the 2005 EIR that considered delivery of recycled water via haul trucks and pipelines for seasonal irrigation of up to 25,000 additional acres of agricultural land.

The City published a notice of preparation (NOP) on August 1, 2018, describing the current project, the project background, and the probable environmental impacts. 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 a Subsequent EIR 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.

On July 19, 2018, the City of Healdsburg sent letters and email messages to the Native American Tribal representatives identified by the Native American Heritage Commission (NAHC) to provide information about the proposed project and invite input. The documented responses from the tribes were lost in the Russian River flood event of February 2019, when the project engineer's office flooded. Because the of the refinements provided in the February 2019 NOP that occurred in the interim, as well as the shift to preparation of a subsequent EIR, the City re-sent the invitation letters to consult pursuant to AB 52 to the Native American tribes on the NAHC list on April 23, 2019. In addition, the Notice of Availability of the Draft SEIR was sent to these representatives. No written or verbal responses to these

outreach efforts have been received that indicate any concern for tribal cultural resources as a result of project implementation.

A Draft SEIR was prepared to analyze the project's potential impacts related to the following environmental resource topics:

- Land use consistency, agriculture, and forestry resources
- Hydrology and water quality
- Fisheries resources
- Terrestrial biological resources (vegetation, wildlife, and wetland resources)
- Earth resources (geology, soils, seismicity, and paleontology)
- Air quality
- Noise
- Cultural resources
- Transportation
- Greenhouse gases
- Wildfires
- Energy

A Notice of Availability was published on August 1, 2019 and the Draft SEIR was released for a 45-day public comment and review period extending from August 1, 2019 through September 16, 2019.

A Final SEIR for the project was prepared and brought before the City Council on November 4, 2019. At least 10 days prior to the public hearing, on October 22, 2019, the Final SEIR was made available for public review. The Final SEIR identifies all parties that commented on the Draft SEIR, responds to all comments raised, and provides clarification and corrections to information presented in the Draft SEIR. The Final SEIR together with the Draft SEIR constitute the SEIR prepared for the project.

2 PROJECT DESCRIPTION

The City of Healdsburg Wastewater Treatment Upgrade Project 2005 EIR addressed separate options for the City's Water Reclamation Facility (WRF) upgrade, effluent disposal, and seasonal irrigation with recycled water. In 2014 and 2016, the City prepared addenda to the 2005 EIR that considered delivery of recycled water via haul trucks and pipelines for seasonal irrigation of up to 25,000 additional acres of agricultural land.

The subject SEIR addresses the City's proposed expansion of the recycled water program, including proposed recycled water facilities and operations. The project includes both specific projects and programmatic components. The specific projects were analyzed in detail in the SEIR in accordance with State CEQA Guidelines Section 15161 ("Project EIR"). The components identified below for the 2018 Program Expansion Area were analyzed based on the available level of detail for these actions in accordance with State CEQA Guidelines Section 15168 ("Program EIR").

The project-level analysis in the 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 of land.
- 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 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 (MG), or 17 percent of the approximately 138 million gallons of water reclaimed during the prohibition period. The expansion of the recycled water program system facilities and activities would serve to meet the North Coast RWQCB discharge prohibition.

3 RECORD OF PROCEEDINGS

For the purposes of CEQA and these Findings, the Record of Proceedings upon which the findings and determinations related to the approval of the project are based, include the following:

1. The Notice of Preparation (NOP), dated August 1, 2018, and all other public notices issued by the City in conjunction with the project, including a revised NOP dated February 5, 2019.
2. The Subsequent DEIR prepared for the project, including all appendices and technical studies referenced therein.
3. The Notice of Availability (NOA), published August 1, 2019, providing notice that the DEIR has been completed and made available for public review and comment.

4. All comments submitted by agencies or members of the public during the NOP and Draft SEIR public comment periods.
5. All comments and correspondence submitted to the City in regards to the project.
6. The Final SEIR, including comments on environmental issues received on the Draft SEIR.
7. Documents cited or referenced in the Draft and Final SEIR.
8. All reports, studies, memoranda, maps, staff reports, and other documentation related to the project and prepared by the City, other public agencies, or consultants to the City.
9. Any minutes, transcripts, or recordings of information sessions, public meetings, or public hearings held in connection with the project.
10. Any documents or other evidence submitted to the City during public meetings.
11. Any documents expressly cited in these CEQA findings, in addition to those enumerated above.
12. Any other materials required for the record of proceedings by Public Resources Code Section 21167.6 Subdivision (e).

Public Resources Code section 21167.6(e) sets forth the contents of the administrative record for CEQA purposes and these findings. Pursuant to CEQA Guidelines Section 15091(e), the location and custodian of the documents and other materials which constitute the record of proceedings upon which these decisions are based is as follows: City of Healdsburg, 401 Grove Street, Healdsburg, California 95448.

4 FINDINGS OF FACT AND STATEMENT OF SUPPORTING FINDINGS

In making these findings, the City ratifies, adopts, and incorporates into these findings the analysis and explanation in the SEIR, and ratifies, adopts, and incorporates into these findings the determination and conclusions of the SEIR relating to environmental impacts and mitigation measures, except to the extent that any such determinations and conclusions are specifically and expressly modified by these findings. All referenced citations provided in this document can be found in the Draft SEIR References chapter.

4.1 FINDINGS REGARDING EIR ERRATA AND EIR RECIRCULATION

CEQA Guidelines Section 15088.5 requires a lead agency to recirculate an EIR when "significant new information" is added to the EIR after the lead agency gives public notice of the availability of the Draft EIR but before certification. "Information" may include project changes, changes to the environmental setting, or additional data or other information. The Guidelines do not consider new information to be significant unless the lead agency changes the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect or a feasible way to mitigate the impact that the agency or project proponent has declined to implement.

Section 15088.5 states "significant new information" requiring recirculation may include:

1. A new significant environmental impact that had not previously been disclosed in the Draft EIR would result from the project or from a new mitigation measure;

2. A substantial increase in the severity of an environmental impact that had already been identified unless mitigation measures would be adopted to reduce the impact to a level of insignificance;

3. A feasible project alternative or mitigation measure would considerably lessen the significant environmental impacts of the project, but the proponents will not adopt it; or

4. The Draft EIR was so inadequate and conclusory that meaningful public review and comment were precluded.

The changes to the Draft SEIR noted below make typographical corrections, provide clarifications, or provide additional supportive information. In some instances, mitigation measures were added or revised for clarity or to more explicitly address a topic raised by one or more comments on the Draft SEIR. These changes do not substantively change the analysis or conclusions presented in the Draft EIR. No significant new information has been added to the SEIR since public notice was given of the availability of the Draft SEIR. Therefore, recirculation of the SEIR pursuant to CEQA Guidelines Section 15088.5 is not required.

The following corrections and clarifications have been made to the Draft SEIR, as shown below in Table 1 in underline and ~~strikeout~~ text.

Table 1 – Draft SEIR Corrections and Clarifications

Draft SEIR Location	Draft SEIR Revision
p. 3.4-38	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.
pp. 3.4-39 to 3.4-40	S3.4-9: Protect Valley Oak Woodland Sensitive Natural Community in the diary/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 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 diary/vineyard 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 S3.4-3a~~1~~, "Avoid and Minimize Impacts on Special-Status Amphibians and Reptiles"), subject to review and approval by the City of Healdsburg in consultation with 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-~~5~~7, " Implement Requirements of the Sonoma County Valley Oak Habitat Combining District~~Protect Trees Subject to Sonoma County Valley Oak Combining District~~" for all native tree species affected.

4.2 FINDINGS REGARDING LESS THAN SIGNIFICANT IMPACTS (NO MITIGATION REQUIRED)

During the SEIR scoping process and preliminary analysis of the proposed project, the following environmental resource areas were determined to have impacts that would not be significant:

- Population and Housing
- Public Services
- Recreation
- Utilities
- Hazards and Hazardous Materials
- Mineral Resources
- Visual Resources

Upon preparing the detailed analysis in the Draft SEIR, the impacts listed below were determined to be less than significant. The City agrees with the characterization in the SEIR of all impacts identified as "less than significant" and finds that those impacts have been described accurately and are either less than significant or have no impact, as described in the SEIR. Section 15091 of the CEQA Guidelines does not require specific findings to address environmental effects that an EIR identifies as having "no impact" or a "less than significant" impact. However, these findings account for all resource areas in their entirety. The impacts where the proposed project would result in either no impact or a less than significant impact, and which require no mitigation, are identified in the bulleted list below. Please refer to the Draft SEIR and the Final SEIR for more detail.

4.2.1 LAND USE CONSISTENCY, AGRICULTURE, AND FORESTRY RESOURCES

Impact 3.1-1: Consistency with Sonoma County Adopted Policies, Land Use Designations, and Zoning

4.2.2 FISHERIES RESOURCES

Impact 3.3-1: Potential for Loss of Individuals, or Loss of Occupied Habitat of Endangered, Threatened, or Rare Species of Fish

Impact 3.3-2: Potential for Substantial Interference with the Movement of a Native Resident or Migratory Fish or Impedance of the Use of Native Wildlife Nursery Sites

4.2.3 TERRESTRIAL BIOLOGICAL RESOURCES

Impact 3.4-5: Impacts on Western Red Bat

Impact 3.4-6: Impacts on American Badger

4.2.4 EARTH RESOURCES

Impact 3.5-1: Potential to Expose Structures to Seismic Activity and Related Ground Failure

4.2.5 AIR QUALITY

Impact 3.6-1: Conflict with or Obstruction of the Applicable Air Quality Plan.

Impact 3.6-3: Exposure of Sensitive Receptors to Substantial Pollutant Concentrations.

Impact 3.6-5: Emissions Leading to Odors that Would Adversely Affect a Substantial Number of People.

4.2.6 NOISE

Impact 3.7-2: Generation of Long-Term Increases in Traffic Noise Levels

Impact 3.7-3: Generation of Long-Term Increases in Stationary-Source Noise Levels

Impact 3.7-4: Generation of Excessive Groundborne Vibration or Groundborne Noise Levels

4.2.7 TRANSPORTATION

Impact 3.9-1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System, Including Transit, Roadway, Bicycle, and Pedestrian Facilities.

Impact 3.9-2: Conflict or Inconsistency with State CEQA Guidelines Section 15064.3(b).

4.2.8 GREENHOUSE GAS EMISSIONS

Impact 3.10-1: GHG Emissions and Consistency with Applicable Plans, Policies, or Regulations.

4.2.9 ENERGY

Impact 3.11-1: Consumption of Energy and Consistency with State or Local Plans for Renewable Energy or Energy Efficiency.

4.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

No Significant or Potentially Significant Impacts which cannot be avoided or mitigated to a less-than-significant level were identified in the SEIR.

4.4 FINDINGS REGARDING SIGNIFICANT OR POTENTIALLY SIGNIFICANT IMPACTS WHICH CAN BE AVOIDED OR MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

The City of Healdsburg hereby finds that feasible mitigation measures have been identified in the SEIR and these Findings of Fact that will avoid or substantially lessen the following potentially significant environmental impacts to a less-than-significant level. The potentially significant impacts and the mitigation measures that will reduce them to a less-than-significant level are summarized below. Please refer to the SEIR for more detail.

4.4.1 HYDROLOGY AND WATER QUALITY

Impact 3.2-1: Degradation of Surface Water Quality from the Use of Recycled Water for Landscape and Agricultural Irrigation

Similar to any irrigation, using tertiary-treated recycled water for landscape and agricultural irrigation has the potential to create or contribute to incidental off-site runoff and discharge to adjacent drainages. Thus, discharges of irrigation runoff could reach natural surface waters, potentially causing incidental changes in surface water quality. This impact would be potentially significant.

Mitigation Measure S3.2-1: Implement Best Management Practices to Prevent Runoff from Recycled Water Irrigation

The following BMPs shall be applied to landscape and agricultural irrigation activities to prevent degradation of surface water quality from the application of recycled water.

- Do not irrigate during or immediately before or after rainfall events.
- Apply recycled water within hydraulic agronomic rates.
- Do not irrigate on water-saturated or frozen ground.
- Do not irrigate before a predicted rainfall event of 0.5 inch or greater.
- Do not irrigate for more than 12 continuous hours.
- Allow at least 24 hours of drying time between irrigations.
- Do not allow recycled water to pond on-site. All irrigation water shall infiltrate within a 24-hour period.
- Maintain 100-foot setbacks to surface waters (including ponds with river connections), unless it can be demonstrated that a lesser setback is sufficient.
- Inspect and maintain irrigation distribution system once per week during growing season to prevent pipe breaks or leaks.
- Repair leaks or pipe breaks within 72 hours or prior to the release of 1,000 gallons, whichever comes first.
- Do not install hose bibs in areas that can be accessed by general public.
- Inspect and maintain drip emitters once per month during growing season. Verify or re-establish proper operation, aim, and flowrate.
- Periodically adjust valves or pressure regulators to ensure operation of the irrigation system at the appropriate pressure.
- Conduct recycled water operations training before each growing season and whenever new employees are hired.
- Ensure that the site supervisor attends the initial and periodic refresher training required of all recycled water users.
- Implement the above measures in accordance with the BMPs prescribed by the applicable North Coast RWQCB Title 22 permit.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect associated with degradation of surface water quality. The changes are specifically identified as Mitigation Measure S3.2-1 in the SEIR. Implementing this mitigation measure would reduce the potential surface water quality impact to less than significant because compliance with these BMPs would substantially limit the volume of runoff during irrigation activities, and thus limit contact between the tertiary treated water and surface waters.

Impact 3.2-2: Degradation of Surface Water Quality from the Use of Recycled Water for Agricultural Frost Protection

Using tertiary-treated recycled water for frost protection of agricultural crops has the potential to create or contribute to incidental off-site runoff and discharge to adjacent drainages. Therefore, discharges of irrigation runoff could reach natural surface waters, potentially causing incidental changes in water quality. This impact would be potentially significant.

Mitigation Measure S3.2-2: Implement Best Management Practices to Prevent Runoff of Recycled Water Applied for Frost Protection

The following BMPs shall be applied to frost protection activities to prevent degradation of surface water quality from the application of recycled water.

- Conduct preseason inspections and infrastructure testing to ensure proper operation and verify that runoff capture systems are in place.
- Limit application rates to the rates established by the City of Healdsburg to prevent site runoff.
- Check irrigation systems during spray events to minimize ponding and runoff.
- Do not use recycled water within 25 feet of state waters containing standing or flowing water or in a manner that could result in uncontrolled runoff into state waters.
- Adequately protect all recycled water storage ponds from erosion, washout, and flooding from a 24-hour rain event having a predicted frequency of once in 25 years.
- Prevent recycled water from entering street gutters, storm drains, or nearby creeks.
- The site supervisor must attend the initial and periodic refresher training required of all recycled water users.
- Implement the above measures in accordance with the BMPs prescribed by the applicable North Coast RWQCB Title 22 permit.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect associated with degradation of surface water quality. The changes are specifically identified as Mitigation Measure S3.2-2 in the SEIR. Implementing this mitigation measure would reduce the potential water quality impacts to less-than-significant because compliance with these BMPs would substantially limit the volume of runoff during frost protection activities, and thus limit contact between the tertiary treated water and surface waters.

Impact 3.2-3: Degradation of Groundwater Quality from the Use of Recycled Water for Landscape and Agricultural Irrigation

Using tertiary-treated recycled water for landscape and agricultural irrigation could cause recycled water to infiltrate into the groundwater table, potentially causing incidental changes to water quality. Irrigation would typically take place during the summer and fall when groundwater levels are lower. This impact would be potentially significant.

Mitigation Measure S3.2-3: Implement Best Management Practices to Prevent Recycled Water Applied during Irrigation Activities from Entering Groundwater

The following BMPs shall be applied to landscape and agricultural irrigation activities to prevent degradation of groundwater quality from the application of recycled water.

- Apply recycled water within hydraulic agronomic rates.
- Do not irrigate within 50 ft of domestic water supply wells.
- Do not allow recycled water to pond on-site. All irrigation water must infiltrate within a 24-hour period.
- Do not irrigate on water-saturated or frozen ground
- Do not irrigate prior to a predicted rainfall event of 0.5 inches or greater.
- Implement short and frequent irrigation periods to prevent soil saturation and increase the soil water available to roots.
- Apply recycled water within nitrogen agronomic rates.
- When calculating the amount of commercial fertilizer needed, consider the nitrogen load applied through irrigation with recycled water.
- Implement the above measures in accordance with the BMPs prescribed by the applicable North Coast RWQCB Title 22 permit.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect associated with degradation of groundwater quality. The changes are specifically identified as Mitigation Measure S3.2-3 in the SEIR. Implementing this mitigation measure would reduce the potential surface water quality impact to less-than-significant because compliance with these BMPs would substantially limit potential subsurface infiltration during irrigation activities.

Impact 3.2-4: Degradation of Groundwater Quality from the Use of Recycled Water for Agricultural Frost Protection

Using tertiary-treated recycled water for agricultural frost protection could cause recycled water to infiltrate into the groundwater table, potentially causing incidental changes to water quality conditions. This impact would be potentially significant.

Mitigation Measure S3.2-4: Implement Best Management Practices to Prevent Recycled Water Applied for Frost Protection from Entering Groundwater

The following BMPs shall be applied to frost protection activities to prevent degradation of groundwater quality from the application of recycled water.

- Limit application rates to the agronomic rates established by the City of Healdsburg (see Appendix B of this EIR).
- Avoid applying recycled water for frost protection at a level exceeding the applicable nutrient agronomic rates of the vineyard and the cover crop.
- Conduct preseason inspections and infrastructure testing to ensure proper operation and verify that runoff capture systems are in place.
- Plant cover crops to prevent runoff, protect against erosion, and provide additional nitrogen removal.
- Check irrigation systems during spray events to minimize ponding and runoff.
- Ensure that the site supervisor attends the initial and periodic refresher training required of all recycled water users.
- Implement the above measures in accordance with the BMPs prescribed by the applicable North Coast RWQCB Title 22 permit.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect associated with degradation of groundwater quality. The changes are specifically identified as Mitigation Measure S3.2-4 in the SEIR. Implementing this mitigation measure would reduce the potential water quality impacts to less-than-significant because compliance with these BMPs would substantially limit potential subsurface infiltration during frost protection activities.

Impact 3.2-5: Degradation of Surface Water Quality during Construction

Pipeline construction activities would involve ground disturbance to excavate the linear trenches for the proposed 8-inch and 12-inch recycled-water transmission pipeline extensions, and to install the irrigation system on the diary/vineyard property. The anticipated rate of construction would be approximately 200 linear feet per day. Construction activities have the potential to generate contaminated stormwater runoff from construction sites or to accidentally cause direct nonstormwater discharges of wastes, which are a particular concern when working near or in drainage channels. This impact would be potentially significant.

Mitigation Measure S3.2-5: Develop and Implement a SWPPP and BMPs

In accordance with the SWRCB guidelines for the statewide NPDES stormwater permit for general construction activity, the City (or its designated general contractor) shall prepare a stormwater pollution prevention plan (SWPPP) in compliance with the North Coast RWQCB requirements for construction-related activities. Pollution prevention measures shall be incorporated into all final design and construction plans. The SWPPP shall describe the proposed construction activities, the pollution prevention BMPs to be implemented to prevent discharge of pollutants, and the BMP inspection and monitoring activities to be conducted. All water quality, erosion, and sediment control measures included in the SWPPP shall be

implemented in accordance with the guidelines set forth in the SWPPP and the City's standard BMPs. The SWPPP shall identify the responsibilities of all parties, contingency measures, agency contacts, and training requirements and documentation for those personnel responsible for installation, inspection, maintenance, and repair of BMPs.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect associated with degradation of surface water quality during construction. The changes are specifically identified as Mitigation Measure S3.2-5 in the SEIR. Development and implementation of the SWPPP as required by this mitigation measure would substantially limit the potential for runoff from from the project construction site and associated transport of any pollutants, and thereby reduce the potential impact to less than significant.

4.4.2 BIOLOGICAL RESOURCES

Impact 3.4-1: Impacts on Special-Status Plants

Construction activities associated with installation of the recycled water distribution system in annual grassland habitat could potentially lead to the removal of or indirect impacts on special-status plant species. If special status plant species occur in the pastures that could be subject to an extended wet season due to irrigation, these plants could be affected by irrigation if the irrigation adversely affected the habitat by making the soil too wet for the plants to persist or by otherwise changing soil or habitat conditions. This impact would be potentially significant.

Mitigation Measure 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.

If special-status plants found during focused surveys cannot be completely avoided during construction or irrigation, informal consultation with CDFW shall be conducted to determine the appropriate measures for avoiding significant impacts to the plants. During this consultation, measures to protect the plants during construction shall be developed and implemented. These measures may include one or more of the following: erecting protective fencing (to avoid indirect impact), providing worker education, transplanting the plants to suitable nearby protected habitat, or locating and enhancing another off-site population of the species. The City or its contractor shall implement the protective measures deemed suitable in informal consultation with CDFW.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect associated with special status plants. The changes are specifically identified as Mitigation Measure S3.4-1 in the SEIR. Implementing this mitigation measure would avoid or minimize potential impacts on special-status plants by first identifying the presence of special-status plants and implementing measures to avoid (e.g., by staking or flagging special-status plants) or minimize significant impacts to any identified plants (e.g., by transplanting), thereby reducing the impact to less than significant.

Impact 3.4-2: Temporary Loss or Indirect Loss of Habitat for California Red-Legged Frog, Foothill Yellow-Legged Frog, and Western Pond Turtle

Construction activities could result in indirect impacts on aquatic habitat and riparian vegetation, and result in the degradation of habitat for California red-legged frog, foothill yellow-legged frog, or western pond turtle. This impact would be potentially significant.

> Mitigation Measure S3.4-2: Avoid Indirect Impacts on Habitat for Special-status Amphibians and Reptiles
>
> Before any construction activity, the City shall avoid and minimize indirect impacts on suitable aquatic and riparian habitat for special-status amphibians and reptiles by implementing 2005 EIR Mitigation Measure 3.4-5, "Protect Waters of the United States, Wetlands, and Riparian Habitat" (listed below). To avoid impacts on these habitats, a qualified biologist will be assigned to identify the locations of aquatic resources and riparian habitat and corresponding setbacks for avoidance. Riparian setback requirements will be identified as appropriate (i.e., minimum 25-foot setback) on project maps in accordance with provisions in the certified EIR (2005), and to comply with Sonoma County Riparian Corridor Combining Zone streamside conservation setback requirements.
>
> Measures to minimize erosion and runoff will be included in all drainage plans, in accordance with the Sonoma County Construction Grading and Drainage Ordinance. Appropriate runoff controls, such as berms, straw wattles, silt fencing, filtration systems, and sediment traps, will be implemented to control siltation and the potential discharge of pollutants.
>
> > Mitigation Measure 3.4-5: Protect Waters of the United States, Wetlands, and Riparian Habitat (from 2005 EIR):
> >
> > - Before project implementation, a delineation of jurisdictional waters of the United States, including wetlands and all riparian habitat, that would be affected by the proposed options shall be made by qualified biologists using the U.S. Army Corps of Engineers (USACE) methodology for wetland delineations.
> > - The applicant shall consult with USACE to determine whether the waters and wetlands occurring onsite fall under the jurisdiction of USACE. If it is determined that the waters and/or wetlands onsite fall under USACE jurisdiction, a permit under Section 404 of the CWA would be required from USACE.
> > - If it is determined through consultation with USACE that the waters and/or wetlands occurring onsite do not fall under USACE jurisdiction, no Section 404 permit from USACE would be required.
> > - RWQCB certification, pursuant to Section 401 of the Clean Water Act (CWA), and a streambed alteration agreement, pursuant to Section 1602 of the Fish and Game Code,

would likely be required for impacts on waters and wetlands onsite, including those waters and wetlands that are not considered under the jurisdiction of the USACE.

- Impacts on USACE jurisdictional waters of the United States, including wetlands, and CDFW jurisdictional riparian habitat should be avoided, if feasible. If these sensitive habitats cannot be avoided, then implement the following measures:
  - < Before construction begins, authorization for fill of jurisdictional areas shall be secured from USACE via the Section 404 permitting process. A Section 401 RWQCB certification shall be secured for effects on water quality.
- A CDFW streambed and lakebed alteration agreement shall be required for construction in the bed, bank, or associated riparian vegetation of rivers and creeks in the project area.
- The acreage of jurisdictional habitat removed shall be replaced or rehabilitated on a no-net-loss basis in accordance with USACE and CDFW regulations. Habitat restoration, rehabilitation, and replacement shall be at a location and by methods agreeable to USACE and CDFW.
- An onsite wetlands mitigation plan, including a replacement ratio for wetlands agreed to by USACE, shall be developed by a qualified biologist. The mitigation plan shall quantify the total jurisdictional acreage lost and shall describe creation/replacement ratios for acres filled, annual success criteria, potential mitigation sites, and monitoring and maintenance requirements. The plan shall be prepared by a qualified wetland biologist pursuant to, and through consultation with, USACE. Implementation of the plan shall create wetlands to compensate for the loss of jurisdictional waters of the United States.
- Measures to minimize erosion and runoff into drainage channels shall be included in all drainage plans. Appropriate runoff controls, such as berms, storm gates, detention basins, overflow collection areas, filtration systems, and sediment traps, shall be implemented to control siltation and the potential discharge of pollutants.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect associated with habitat for California red-legged frog, foothill yellow-legged frog, or western pond turtle. The changes are specifically identified as Mitigation Measure S3.4-2 in the SEIR, including Mitigation Measure 3.4-5 from the original 2005 EIR. Implementing this mitigation measure would avoid or minimize potential impacts on aquatic resources and riparian habitat that could provide habitat for special-status amphibians and reptiles. By establishing sufficient buffer distances from any identified aquatic resources or riparian habitat, in conjunction with implementing runoff controls in compliance with the Sonoma County Construction Grading and Drainage Ordinance, potential indirect construction effects on special status reptiles or amphibians would be avoided or minimized. The impact with implementation of this mitigation measure would be less than significant.

Impact 3.4-3: Impacts on California Red-Legged Frog, Foothill Yellow-Legged Frog, and Western Pond Turtle

Grading, clearing, and other activities associated with project construction could result in direct and indirect impacts on special-status amphibian and reptile species. This impact would be potentially significant.

Mitigation Measure S3.4-3a: Avoid and Minimize Impacts on Special-Status Amphibians and Reptiles

The City shall avoid and minimize impacts on California red-legged frog, foothill yellow-legged frog, and western pond turtle by implementing the following measures listed below:

- Before the start of any construction activity, the construction contractor shall develop a worker environmental awareness program subject to review and approval by the City of Healdsburg. Before the start of construction, the environmental training will be provided to all personnel working on the project site during construction and operation. Worker environmental awareness program training materials will be submitted to the City, for their review and approval before ground-disturbing activities begin. Once approved, all City, consultant, and construction personnel entering the project site will be trained before being allowed on-site. Training materials and briefings will include but not be limited to:
    - discussion of the federal ESA and CESA, the MBTA, and CWA; California Fish and Game Code Sections 3503, 3503.5, 3511, 3513, 3800(a), 4150, 4700, 5050, 5515, and 1602; and the Porter-Cologne Act, as applicable;
    - the consequences of noncompliance with these regulatory requirements; specific conditions of any permits from regulatory and other agencies obtained for the project (e.g., USACE, North Coast RWQCB, USFWS, NMFS, CDFW, and the County);
    - identification and values of the special-status amphibian and reptile species to be protected, as well as their life history descriptions, habitat requirements during various life stages, and the species' protected status;
    - hazardous substance spill prevention and containment measures;
    - clear instructions that if any workers encounter a special-status species within or near the project site during construction, work shall halt and the project biologist and City shall be informed;
    - clear instructions regarding the scenarios in which permit conditions require the notification of specific agencies, the method for contacting the agencies, and the legally required time frames for such contact;
    - a contact person at the on-call biological services provider in the event of the discovery of dead or injured wildlife; and
    - review of any mitigation requirements related to biological resources.
- The City shall assign a qualified biologist to flag or fence aquatic habitats to clearly delineate the extent of construction. All crews will be provided a set of drawings showing the locations of aquatic habitats in and near the work area.
- Before issuance of a grading permit, the City shall consult with the State Water Resources Control Board and the North Coast RWQCB to acquire the appropriate regulatory approvals that may be necessary to obtain Section 401 water quality certification, a State Water Resources Control Board statewide National Pollutant Discharge Elimination System stormwater permit for general construction activity (Water Quality Order 2009-0009-DWQ), and any other necessary site-specific waste discharge requirements or waivers under the Porter-Cologne Act. The City shall prepare and submit the appropriate notices of intent

and if applicable prepare the storm water pollution prevention plan and any other necessary engineering plans and specifications for erosion and pollution prevention and control.

Mitigation Measure S3.4-3b: Develop and Implement a Preconstruction Survey Plan for Special-Status Amphibians and Reptiles.

The City and its construction contractor shall implement preconstruction surveys as described below. The preconstruction survey plan will identify, at minimum, the following information for each special-status amphibian species and western pond turtle:

- The life stage(s) to be surveyed for
- Survey method(s)
- Timing of survey(s)
- Justification for timing and methodology of survey design (e.g., watershed characteristics, timing and rate of spring runoff, day length, average ambient air and water temperatures, local and seasonal conditions)

The City and its construction contractor shall conduct preconstruction surveys for special-status amphibians and western pond turtles. Preconstruction surveys shall include, at minimum, the following provisions:

- Surveys shall be conducted by a qualified biologist within 3–5 days before entering or working within suitable aquatic and/or upland habitat.
- Surveys shall be conducted within the boundaries of the proposed worksite plus a 500-foot buffer zone of the construction area.
- Surveys shall include a description of any standing or flowing water.
- Visual surveys for California red-legged frog, foothill yellow-legged frog, and western pond turtle.
- If special-status amphibians or reptiles are detected during the preconstruction survey, impacts shall be avoided by establishing an exclusion buffer of no less than 50 feet within which construction activities shall be prohibited. A qualified biologist shall be on-site during all nearby construction activities. If the biologist determines that the habitat is no longer occupied, construction may proceed within the exclusion buffer.

If avoidance is infeasible, the City and its construction contractor shall coordinate with CDFW and, if applicable, USFWS (i.e., for California red-legged frog) to passively relocate the special-status amphibian or reptile.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect on California red-legged frog, foothill yellow-legged frog, or western pond turtle. The changes are specifically identified as Mitigation Measure S3.4-3a and Mitigation Measure S3.4-3b in the SEIR. These mitigation measures would avoid and minimize impacts on special-status amphibians and reptiles by identifying the locations of and habitat for these species with protective measures such as establishing construction exclusion zones and best management practices to avoid adverse effects on water quality. In addition, development of a worker awareness program would train construction employees in identifying sensitive species, and provide a clear process if sensitive species were observed onsite that would serve to avoid or minimize any impact (e.g., stop work and notify the designated on-call biologist).

Implementing Mitigation Measures S3.4-3a through S3.4-3b would reduce the impact on special-status amphibian and reptile species to less than significant.

Impact 3.4-4: Impacts on Nesting Raptors

Common raptor species such as the red-tailed hawk and American kestrel, and special-status raptor species that nest within or immediately adjacent to the project area, including white-tailed kite and osprey, may be subjected to construction impacts because suitable nesting habitat for these species is present in the project area. This impact would be potentially significant.

Mitigation Measure S3.4-4: Protect Nesting Raptors

The City and its construction contractor shall implement the following measures to protect nesting raptors:

- To the extent feasible, all grading and tree removal will occur outside the raptor nesting season (September through January). If grading or tree removal is avoided during the raptor nesting season, no further mitigation would be necessary. This measure applies to any heavy equipment activities that would occur within 500 feet of trees in or adjacent to the project area.
- If grading within 500 feet of trees or tree removal is proposed to take place during the raptor nesting season, a focused survey for raptor nests will be conducted by a qualified biologist during the nesting season to identify active nests in the project area. The survey would be conducted no more than 30 days before the beginning of grading or tree removal. The results of the survey would be summarized in a written report to be submitted to the City of Healdsburg before the beginning of grading.

If active nests are found, no construction activity shall take place within 300 feet of the nest until the young have fledged (as determined by a qualified biologist). If no active nests are found during the focused survey, no further mitigation will be required.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect on nesting raptors. The changes are specifically identified as Mitigation Measure S3.4-4 in the SEIR. Implementing this mitigation measure would avoid or minimize potential impacts on nesting raptors by avoiding the nesting season and/or conducting surveys to identify and avoid construction activity within 300 feet of an active nest, thereby reducing the impact to less than significant.

Impact 3.4-7: Impacts on Trees Subject to Sonoma County Valley Oak Habitat Combining District

Construction activities could indirectly damage tree roots and potentially result in the loss of valley oak trees protected under Sonoma County Valley Oak Habitat Combining District. This impact would be potentially significant.

Mitigation Measure S3.4-7: Implement Requirements of the Sonoma County Valley Oak Habitat Combining District

For portions of the proposed pipeline extensions that fall within the Valley Oak Habitat Combining District as designated by the County of Sonoma, removal of any valley oak tree, or small valley oaks having a cumulative diameter at breast height greater than 60 inches, will be

mitigated by implementing the measures outlined in Section 26-67-030 of the Sonoma County Zoning Ordinance. Consistent with the requirements of the Sonoma County Ordinance, compensation for loss of valley oak trees shall include one or more of the following requirements:

- retaining other valley oaks on the subject property;
- planting replacement valley oaks on the subject property or on another site in the county having the geographic, soil, and other conditions necessary to sustain a viable population of valley oaks;
- a combination of measures two measures listed above; or
- paying an in-lieu fee, which shall be used exclusively for valley oak planting programs in the county.

The specific requirements are specified in Table 26-67-030 of the County zoning ordinance. The applicable measures shall be undertaken and completed within 1 year after the valley oak or valley oaks are cut down or removed in accordance with guidelines established by resolution or ordinance of the board of supervisors.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect on valley oak trees protected under Sonoma County Valley Oak Habitat Combining District. The changes are specifically identified as Mitigation Measure S3.4-7 in the SEIR. Implementing this mitigation measure would ensure compliance with the Sonoma County regulations that require compensation for any loss of protected tree species through onsite preservation, onsite or offsite replacement, or payment of an in-lieu fee to fund planting programs in Sonoma County. thereby reducing the impact on valley oak trees and oak woodland habitat to a less-than-significant level.

Impact 3.4-8: Impacts on Jurisdictional Waters of the United States, Wetlands, and Riparian Habitat

Construction activities could potentially affect jurisdictional waters of the United States, including wetlands, and riparian habitat, through indirect impacts such as degradation of water quality. This impact would be potentially significant.

Mitigation Measure S3.4-8a: Protect Waters of the United States, Wetlands, and Riparian Habitat from adverse effects due to water quality impacts

The City and its construction contractor shall avoid and minimize indirect impacts on waters of the United States, wetlands, and riparian habitat by implementing the following measures:

- Before any construction activity, a qualified biologist will be assigned to identify the locations of aquatic resources and riparian habitat and corresponding setbacks for avoidance. Identification of aquatic resources and riparian habitat for avoidance will be in addition to and distinguished from any required construction boundary fencing or flagging. Riparian setback requirements will be identified as appropriate (i.e., minimum 25-foot setback) on project maps in accordance with provisions in the certified EIR (2005), and to comply with Sonoma County Riparian Corridor Combining Zone streamside conservation setback requirements. Streamside conservation areas will be established as indicated in the

zoning database from the top of the highest bank, and increased to include the outer drip line of any riparian trees, if present.

- Measures to minimize erosion and runoff into the drainage ditch south of Hozz Road will be included in all drainage plans, in accordance with the Sonoma County Construction Grading and Drainage Ordinance. Appropriate runoff controls, such as berms, straw wattles, silt fencing, filtration systems, and sediment traps, will be implemented to control siltation and the potential discharge of pollutants.
- Direct impacts on USACE jurisdictional waters of the United States, including wetlands, and CDFW jurisdictional riparian habitat will be avoided. If direct impacts cannot be avoided because direct physical disturbance would occur in these habitats, then the City and its construction contractor shall implement the following measures:
    - Before project implementation, a formal delineation of jurisdictional waters of the United States, including wetlands and all riparian habitat, that would be directly affected by the proposed options will be made by qualified biologists using the USACE methodology for wetland delineations.
    - The City shall consult with USACE to determine whether the waters and wetlands occurring on-site that would be directly affected by construction activity fall under the jurisdiction of USACE. If it is determined that the waters and/or wetlands that will be directly impacted fall under USACE jurisdiction, a permit under Section 404 of the CWA would be required from USACE.
    - If a 404 permit is required, secure authorization for fill of jurisdictional areas from USACE via the Section 404 permitting process, and a Section 401 RWQCB certification for effects on water quality before construction begins.
    - RWQCB certification, pursuant to Section 401 of the CWA would likely be required for direct impacts on waters and wetlands on-site, including those waters and wetlands which are not considered under the jurisdiction of the USACE but would fall under jurisdiction of the state.
    - A CDFW streambed and lakebed alteration agreement would be required for construction in the bed, bank, or associated riparian vegetation of rivers and creeks in the project area.
    - If permits are needed, the City shall comply with the mitigation requirements of the permits. At a minimum, the acreage of jurisdictional habitat removed will be replaced or rehabilitated on a no-net-loss basis in accordance with USACE, RWQCB and CDFW regulations. Habitat restoration, rehabilitation, and replacement would be at a location and by methods agreeable to USACE, RWQCB, and CDFW.If needed as a results of permit requirements from USACE, CDFW, or RWQCB an on-site wetlands mitigation plan, including a replacement ratio for habitat types agreed to by the agencies, would be developed by a qualified biologist. The mitigation plan would quantify the total jurisdictional acreage lost and describe creation/replacement ratios for acres filled, annual success criteria, potential mitigation sites, and monitoring and maintenance requirements. The plan would be prepared by a qualified wetland biologist pursuant to, and through consultation with the regulatory agency whose permit requirement is triggering the permit. Implementing the plan would create habitat to compensate for the loss of jurisdictional waters of the United States.

- Alternatively to onsite mitigation, the City may seek to purchase credit at a a local agency approved mitigation bank, if available.

Mitigation Measure S3.4-8b: Prevent Runoff of Recycled Water Applied to Irrigated Pasture

To avoid indirect impacts on jurisdictional waters of the United States, including wetlands, and riparian habitat as a result of runoff of summer irrigation water from pastures, develop a site-specific irrigation management plan as part of a recycled water use agreement between dairy/vineyard property and the City of Healdsburg before installation of a recycled water meter at the user's property. The irrigation management plan will ensure compliance with the General Order of the Regional Water Board, which requires use of recycled water at agronomic rates that consider soil, climate, and plant demand. The irrigation management plan will include provisions of the General Order, including general operating parameters, monitoring and reporting procedures, and methods to ensure compliance with Titles 17 and 22 of the California Code of Regulations. The irrigation management plan may include downloading evapotranspiration data from the local California Irrigation Management Information System Windsor Station No. 103 on a daily or weekly basis to better inform irrigation system operation. The irrigation management plan will also include the general parameters and limitations applicable to the project, summarized as follows.

Irrigation Management Plan General Parameters and Limitations:

Irrigation Type	Irrigation Months	Irrigation Schedule	Irrigation Method	Monthly Agronomic Rate (acre-ft/ac)	Annual Agronomic Rate (acre-ft/ac)
Pasture	May–October	Daily, depending on demand	Sprinkler	0.02 to 0.76	3.08
Vineyard	April–September	Variable, generally weekly	Drip Irrigation	0.03 to 0.19	0.75
Note: acre-ft/ac = acre-feet per acre					

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect on jurisdictional waters of the United States, including wetlands, and riparian habitat. The changes are specifically identified as Mitigation Measure S3.4-8a and Mitigation Measure S3.4-8b in the SEIR. Implementing Mitigation Measure S3.4-8a would avoid or minimize potential indirect impacts on jurisdictional waters of the United States, wetlands, and riparian habitat by identifying the presence of such habitats and avoiding them during constrution. It would also mitigate for direct impacts to these habitat (if unavoidable) but obtain permits and develop appropriate mitigation plans with federal and state regulators where necessary, thus compensating for any effects on jurisdictional waters of the United States, including wetlands, and riparian habitat. Implementing Mitigation Measure S3.4-8b would avoid or minimize potential indirect impacts on waters of the United States, wetlands, and riparian habitat by implementing an irrigation management plan that would limit runoff of recycled water. Therefore, indirect and direct impacts to these habitat would be reduced to a less-than-significant level.

Impact 3.4-9: Impacts on Sensitive Natural Communities

Construction activities related to grading, stockpiling, trenching, and drilling could injure or damage oak tree roots and lead to a decline in health and/or size of the affected oak woodland vegetation. This impact would be potentially significant.

Mitigation Measure 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 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 dairy/vineyard 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 S3.4-1, "Avoid and Minimize Impacts on Special-Status Amphibians and Reptiles"), subject to review and approval by the City of Healdsburg in consultation with 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 Sonoma County Valley Oak Habitat Combining District" for all native tree species affected.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect on sensitive natural communities. The changes are specifically identified as Mitigation Measure S3.4-9 in the SEIR. Implementing this mitigation measure would avoid or minimize potential direct removal or indirect harm to to valley oaks and valley oak woodland sensitive natural community by providing compensation for any loss of any tree species protected under the Sonoma County Ordinance through onsite preservation, onsite, or offsite replacement, or payment of an in-lieu fee to fund planting programs in Sonoma County, thereby reducing the impact to less-than-significant.

4.4.3 EARTH RESOURCES

Impact 3.5-2: Construction-Related Erosion

Implementing the proposed options would require trenching, grading, and placement of fill materials during project construction. Soil disturbance associated with construction activities would increase the potential for ground instability and erosion, and the placement of fill could result in unstable soil conditions associated with loose or uncompacted fill materials. This impact would be potentially significant.

Mitigation Measure S3.5-2: Develop and Implement an Erosion Control Plan

As required by Chapter 17.36 of the City of Healdsburg Municipal Code, the City shall develop and implement an erosion control plan that specifies the land treatment, structural measures, and timing requirements that would be implemented at the project site to effectively minimize soil erosion and sedimentation. The plan shall also include appropriate construction site BMPs to prevent erosion and off-site sediment transport; the specific locations where BMPs will be installed; a maintenance schedule; and the rationale for selecting the BMPs. The plan shall be prepared by a registered civil engineer. Erosion and sediment control BMPs that could be used include, but are not limited to, detention basins, berms, swales, wattles, silt fencing, and covering stockpiled soils.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect from construction-related erosion. The changes are specifically identified as Mitigation Measure S3.5-2 in the SEIR. Implementing this mitigation measure would reduce this potential earth resources impact to a less-than-significant level because an erosion control plan with site-specific BMPs would be implemented to limit erosion.

Impact 3.5-3: Location of the Project on an Unstable Geologic Unit or Soil

Most of the 2018 Proposed Area and the 2018 Program Expansion Area on the west side of Westside Road would be located on steep slopes and in mapped landslide deposits. Thus, the potential for additional landslides to occur in the future is high. The proposed facilities on the dairy/vineyard property and the 12-inch pipeline extension along Westside Road in the 2018 Program Expansion Area could be subject to landslide damage during operations. This impact would be potentially significant.

Mitigation Measure S3.5-3: Prepare a Design-Level Landslide Hazards Evaluation

A design-level landslide hazard evaluation shall be completed before construction permits are issued for all proposed facilities on the west side of Westside Road. The study shall specifically address the susceptibility of the site to landslides and shall include recommendations applicable to earthwork and site preparation, such as buttressing toe slopes and avoiding certain hazardous locations more susceptible to landslides. The evaluation shall be prepared by a registered civil or geotechnical engineer. Measures included in the report shall be implemented as appropriate, based on specific site conditions.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect related to landslide hazards. The changes are specifically identified as Mitigation Measure S3.5-3 in the SEIR. Implementing this mitigation measure would reduce this potential earth resources impact to a less than significant level because site-specific design measures to reduce landslide hazards would be implemented.

Impact 3.5-4: Location of the Project on Expansive Soil

Soils associated with the proposed booster pump station in the 2018 Proposed Area and the future extension of the 12-inch pipeline along Westside Road in the 2018 Program Expansion Area, have a moderate to high shrink-swell potential. The expansion potential of these soils could result in damage to project structures during operation. This impact would be potentially significant.

Mitigation Measure S3.5-4: Prepare Design-Level Geotechnical Study to Address Expansive Soils

A design-level geotechnical study shall be completed for the project area before construction permits are issued. The study shall specifically address whether expansive soils are present in the project area and shall identify measures, such as use of artificial/imported fill or soil treatment with lime, to address these soils where they occur. Measures included in the report shall be implemented as appropriate, based on specific soil conditions.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect related to expansive soils. The changes are specifically identified as Mitigation Measure S3.5-4 in the SEIR. Implementing this mitigation measure would reduce this potential earth resources impact to a less-than-significant level because a design-level geotechnical study will be prepared to identify whether expansive soils are present and identify measures to address such soils where they occur, thereby reducing the impact to a less-than-significant level.

Impact 3.5-5: Potential Damage to or Destruction of Unique Paleontological Resources

Project-related construction activities associated with proposed water conveyance pipelines in both the 2018 Proposed Area and a portion of the 2018 Program Expansion Area, along with the proposed booster pump station, would occur within Pleistocene-age alluvial deposits. Earthmoving activities in these deposits could result in accidental damage to or destruction of unique paleontological resources. This impact would be potentially significant.

Mitigation Measure S3.5-5: Conduct Construction Personnel Education, Stop Work if Paleontological Resources are Discovered, Assess the Significance of the Find, and Prepare and Implement a Recovery Plan, as Required

To minimize the potential for destruction of or damage to potentially unique, scientifically important paleontological resources during project-related earthmoving activities associated with all water conveyance pipelines and the booster pump station, the City shall implement the following measures.

- Before the start of construction activities, construction personnel involved with earthmoving activities shall be informed of the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction activities, and proper notification procedures should fossils be encountered. This worker training may either be prepared and presented by an experienced field archaeologist at the same time as construction worker education on cultural resources, or prepared and presented separately by a qualified paleontologist.

If paleontological resources are discovered during earthmoving activities, the construction crew shall notify the City and shall immediately cease work in the vicinity of the find. The City shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with SVP (1996) guidelines. The recovery plan may include but is not limited to a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the City, as the CEQA lead agency, to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect on paleontological resources. The changes are specifically identified as Mitigation Measure S3.5-5 in the SEIR. Implementing this mitigation measure would reduce this potential earth resources impact to a less-than-significant level because construction workers would be alerted to the possibility of encountering paleontological resources and, in the event that resources were discovered, work would stop immediately, and fossil specimens would be recovered and recorded and would undergo appropriate curation.

4.4.4 AIR QUALITY

Impact 3.6-2: Cumulatively Considerable Net Increase in a Criteria Pollutant for Which the Region is Nonattainment.

Construction of the proposed project would generate temporary emissions of ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$ from mobile equipment exhaust, including off-road construction equipment and on-road motor vehicles, and fugitive dust during site preparation and trenching. This impact would be potentially significant.

> Mitigation Measure S3.6-2: Implement Air Quality Emissions Control Measures during Construction
>
> In accordance with the BAAQMD CEQA Guidelines (BAAQMD 2017), as recommended for use by NSCAPCD and the City of Healdsburg, the City and its construction contractor shall implement the following mitigation, which includes BAAQMD-recommended Basic Construction Mitigation Measures Recommended for All Proposed Projects, as applicable to reduce construction-generated emissions. Construction activities shall also comply with all applicable NSCAPCD rules and regulations, specifically Rule 485 regarding architectural coatings, Rule 430 regarding fugitive dust, and Rule 410 regarding visible emissions.
>
> - All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
> - All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
> - All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
> - All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
> - All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
> - Idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications.

- All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The air district's phone number shall also be visible to ensure compliance with applicable regulations.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect related to criteria air pollutants. The changes are specifically identified as Mitigation Measure S3.6-2 in the SEIR. Mitigation Measure S3.6-2 would reduce emissions from construction activities by requiring the use of fugitive dust suppression techniques and best practices for operation of construction equipment. Mitigation Measure S3.6-2 contains emission reduction measures such as watering exposed surfaces twice per day, limiting vehicle speeds on unpaved roads to 15 mph, and minimizing idling times. Based on the Western Regional Air Partnership's Fugitive Dust Handbook, the dust suppression techniques of applying water to exposed surfaces twice per day and limiting on-site vehicle speeds to 15 mph have the potential to reduce particulate matter emissions by approximately 55 and 57 percent, respectively (WRAP 2006). As a result, implementing this mitigation measure would reduce the air quality impact of the project to a less-than-significant level.

4.4.5 NOISE

Impact 3.7-1: Generation of Temporary Construction Noise Levels

Simultaneous operation of on-site construction equipment could generate combined intermittent noise levels of approximately 83 dBA at 50 feet from the project site. As a result, exterior noise levels at the nearest sensitive receptors approximately 700 feet and 900 feet from the construction sites would be 54 dBA and 52 dBA, respectively, which would exceed the 50 dBA daytime threshold and would exceed the existing ambient noise level of 49 dBA in the project area. This impact would be potentially significant.

Mitigation Measure S3.7-1: Implement Noise Control Measures

The City and the general construction contractor shall implement the following measures to reduce construction-generated noise:

- Construction equipment shall be maintained properly and equipped with noise control devices, such as mufflers and shrouds, in accordance with manufacturers' specifications.
- Project construction activities shall be limited to 8 a.m. to 6 p.m. Monday through Friday, 9 a.m. to 6 p.m. on Saturdays, and 10 a.m. to 6 p.m. on Sundays and holidays.
- Construction staging areas shall be located as far from noise-sensitive uses as feasible.
- Construction equipment not being used for more than 30 minutes shall be shut down.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect related to construction noise. The changes are specifically identified as Mitigation Measure S3.7-1 in the SEIR. Implementing Mitigation Measure S3.7-1 would serve to minimize noise levels on adjacent land uses by ensuring the associated equipment is property maintained, operated only when necessary and within allowable

hours, and by maximizing the distance between construction staging areas and nearby uses. This would reduce the impact of temporary construction noise to a less-than-significant level.

4.4.6 CULTURAL RESOURCES

Impact 3.8-1: Potential Impacts on Documented Cultural Resources and Tribal Cultural Resources

If the pipeline along Westside Road were to be extended through the 2018 Program Expansion Area, two cultural resources near the west side of this thoroughfare may be affected. In addition, three other cultural resources are documented in the 2018 Program Expansion Area that could be affected by future recycled water facilities. This impact would be potentially significant.

> **Mitigation Measure S3.8-1: Reduce Potential Impacts on Cultural Resources through Archaeological Monitoring and/or Testing, Where Necessary**
>
> If the pipeline along Westside Road is to be extended or any other subsurface ground disturbance is required in the project area, the City will retain a qualified archaeologist to conduct a cultural resources field survey before ground-disturbing activities. If a potentially affected cultural resource is identified, the qualified archaeologist shall assess the resources further by conducting additional archival research to determine the significance of the resource. If warranted by the field survey and research, the project design shall be refined to help ensure avoidance of the resource and archaeological monitoring of project construction activities in the vicinity of the resource shall be required.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect on documented cultural resources and tribal cultural resources. The changes are specifically identified as Mitigation Measure S3.8-1 in the SEIR. Implementing this mitigation measure would reduce potentially significant impacts on cultural resources because the location and status of any potentially affected archaeological resources would first be confirmed. If warranted by a site-specific evaluation, the project design would be modified, and construction activities would be monitored to help ensure that archaeological resources are avoided. The resulting impact would be reduced to a less-than-significant level.

Impact 3.8-2: Potential Impacts on Undocumented Cultural Resources

Although no prehistoric cultural resources have been documented in the vicinity of the proposed facilities within the 2018 Proposed Area, there are potential undocumented resources that could be affected. Similarly, while no facilities or improvements are currently proposed for the 2018 Program Expansion Area, if the proposed recycled water transmission pipeline to the dairy/vineyard property is extended south along Westside Road, construction of this pipeline extension or other recycled water facilities could substantially impact undocumented cultural resources in the 2018 Program Expansion Area. This impact would be potentially significant.

> **Mitigation Measure S3.8-2: Reduce Potential Impacts on Cultural Resources through Archaeological Monitoring, Where Necessary**
>
> Before ground-disturbing activities are initiated, all construction personnel shall be alerted to the possibility of buried cultural resources, regulations protecting cultural resources and human remains, and the protocol to follow in case such resources are discovered. If potential historical,

architectural, archaeological, or cultural resources are discovered during subsurface excavations at the site of construction, the following procedures shall apply:

1. The Contractor shall immediately notify the City's designated construction management engineer (Engineer) and shall stop any work that may jeopardize the discovery pending an investigation of its significance.
2. The Engineer shall select a qualified archaeologist to complete an evaluation of significance before continuing work in that area.
3. The Engineer shall supply the contractor with a "stop-work order" directing the contractor to cease all portions of the work that the Engineer determines may affect the discovery. The stop-work order shall be effective until a qualified archaeologist assesses the value of the potential cultural resources. The stop-work order shall contain the following:
    a. A clear description of the work to be suspended.
    b. Any instructions regarding issuance of further orders by the contractor for materials services.
    c. Guidance as to action to be taken regarding subcontractors.
    d. Any direction to the contractor to minimize costs.
    e. Estimated duration of the temporary suspension.

The archaeologist shall determine the potential significance of the discovery and shall determine a course of action to reduce further impacts in accordance with CEQA standards. Such efforts may include no action, documentation, or testing and potential further subsurface investigation.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect on undocumented cultural resources. The changes are specifically identified as Mitigation Measure S3.8-2 in the SEIR. Implementing this mitigation measure would limit or avoid potentially significant impacts on cultural resources because previously undocumented cultural resources would be identified and protected, which would reduce potential impacts on cultural resources less-than-significant level.

Impact 3.8-3: Potential to Affect Unrecorded Human Interments

Although no evidence of prehistoric interment was identified in the 2018 Proposed Area and only one historic-era interment was identified in the 2018 Program Expansion Area, unmarked and undocumented subsurface human remains could be present, and construction activities have the potential to uncover unknown or undocumented prehistoric Native American burials and historic-era interments. This impact would be potentially significant.

Mitigation Measure S3.8-3: Stop Potentially Damaging Work if Human Remains Are Discovered during Construction, Assess the Significance of the Find, and Pursue Appropriate Management

California law recognizes the need to protect historic-era and Native American human burials, skeletal remains, and items associated with Native American interments from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097.

In accordance with the California Health and Safety Code, if human remains are uncovered during construction at the project site, the construction contractor shall immediately halt potentially damaging excavation and notify the City's designated representative. The City will immediately notify the Sonoma County coroner of the discovery. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the NAHC by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). After a Most Likely Descendant has been designated by the NAHC, the Most Likely Descendant, in consultation with the City's representative, will determine the ultimate disposition of the remains. The responsibilities of the City for acting upon notification of a discovery of Native American human remains are outlined in detail in PRC Section 5097.9.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect on unrecorded human internments. The changes are specifically identified as Mitigation Measure S3.8-3 in the SEIR. Implementing this mitigation measure would limit or avoid potentially significant impacts on cultural resources because construction work would halt and unrecorded human remains would be treated properly and according to the relevant provisions of state law, which would reduce this impact to a less-than-significant level.

4.4.7 TRANSPORTATION

Impact 3.9-3: Substantial Increase in Hazards Due to a Geometric Design Feature (e.g., Sharp Curves or Dangerous Intersections) or Incompatible Uses (e.g., Farm Equipment).

Project construction would result in temporary disruption to traffic flow, roadway wear and tear, removal or reduction of lanes, the presence of construction equipment in the public right-of-way, and localized increases in traffic congestion. As a result, drivers would be presented with unexpected driving conditions and obstacles, which could increase the occurrence of automobile or haul truck accidents. This impact would be potentially significant.

Mitigation Measure S3.9-3: Prepare and Implement a Traffic Control Plan.

Before construction begins, the City and/or its construction contractor shall prepare and implement a traffic control plan to minimize construction-related traffic safety hazards on affected roadways and ensure adequate access for emergency responders. The City and/or its contractor shall coordinate development and implementation of this plan with agencies with jurisdiction over the affected routes (e.g., Sonoma County), as appropriate. The traffic control plan shall, at minimum:

- Discuss work hours and haul routes, delineate work areas, and identify traffic control methods and plans for flagging.
- Determine the need to require workers to park personal vehicles at an approved staging area and take only necessary project vehicles to the work sites.
- Develop and implement a process for communicating with affected residents and landowners about the project before the start of construction. Public notification shall include posting notices and appropriate signage regarding construction activities. The written notification shall include the construction schedule, the exact location and duration

of activities on each roadway (e.g., which roads/lanes and access points/driveways will be blocked on which days and for how long), and contact information for questions and complaints.

- Notify the public regarding alternative routes that may be available to avoid delays.
- Ensure that appropriate warning signs are posted in advance of construction activities, alerting bicyclists and pedestrians to any closures of nonmotorized facilities.
- Notify administrators of police and fire stations, ambulance service providers, and recreational facility managers regarding the timing, location, and duration of construction activities and the locations of detours and lane closures, where applicable. Maintain access for emergency vehicles in and/or adjacent to roadways affected by construction activities at all times.
- Require the repair and restoration of affected roadway rights-of-way to their original condition after construction is completed.

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect related to traffic hazards. The changes are specifically identified as Mitigation Measure S3.9-3 in the SEIR. Implementing Mitigation Measure S3.9-3 would reduce the potentially significant construction impact associated with traffic hazards to a less-than-significant level because the traffic control plan would be used to develop detours to ensure acceptable traffic flow through and/or around the construction zone, minimize impacts on multimodal facilities by providing alternate routes for users of the facilities, and minimize traffic congestion.

4.4.8 WILDFIRE

Impact 3.12-1: Increased Risk of Wildland Fires.

The use of construction equipment and diesel fuel could pose a wildfire risk because vehicle mufflers, combustion engines, gasoline-powered tools, and other equipment could produce a spark, fire, or flame. This impact would be potentially significant.

Mitigation Measure S3.12-1: Prepare and Implement a Fire Safety and Management Plan to Minimize Potential for Wildland Fires.

Before any construction permits are issued or construction activity begins, the City shall develop a fire protection plan, which the construction contractor shall implement during construction. The fire safety and management plan shall do all of the following:

- Require that light trucks and cars with factory-installed (type) mufflers be used only on roads where the roadway is cleared of vegetation. These vehicle types shall maintain their factory-installed (type) muffler in good condition.
- Ensure that equipment staging areas and worker parking areas are cleared of all extraneous flammable materials.
- Require that construction personnel be trained and equipped to extinguish small fires to prevent them from growing into more serious threats.
- Provide a list of key names and addresses identifying whom to alert in case of an emergency.

- Prohibit smoking in wildland areas, with smoking limited to paved areas or areas cleared of all vegetation.

Implementation Measure 3.12-1: Implement Applicable Requirements of the California Public Resources Code during Construction.

The City of Healdsburg and its construction contractor shall:

- require removal of flammable materials to a distance of 10 feet from any equipment that could produce a spark, fire, or flame on days when burning permits are required (PRC Section 4427);
- provide firefighting equipment, including but not limited to backpack pump-type fire extinguishers filled with water, McLeod fire tools, and a sufficient number of shovels, during the period of highest fire danger (April 1–December 1) (PRC Section 4428); and
- prohibit the use of portable tools powered by gasoline-fueled internal combustion engines within 25 feet of flammable materials when burning permits are required (PRC Section 4431).

Finding: Changes or alterations have been required in, or incorporated into, the project which would avoid or substantially lessen the potentially significant environmental effect related to wildland fires. The changes are specifically identified as Mitigation Measure S3.12-1 in the SEIR. Project construction activities would also be subject to Implementation Measure 3.12-1. Strict adherence to Implementation Measure 3.12-1 would make the construction contractor responsible for monitoring and for implementing safety measures identified in the California Public Resources Code, thereby minimizing any risk of wildfires. Implementing Mitigation Measure S3.12-1 would reduce the potential for exacerbation of and exposure to wildland fires to a less-than-significant level because the City would prepare and implement a fire safety and management plan that would describe emergency fire precautions, require that construction workers be trained in the use of firefighting equipment, and identify emergency notification procedures.

4.5 CUMULATIVE IMPACTS

The SEIR addressed the potential for cumulative effects to occur on each of the environmental resource topics analyzed in the SEIR. Because most of the project impacts identified in SEIR are related to proposed construction activities, the analysis of cumulative impacts focuses the on the potential cumulative effects that could result from construction activities under the Sonoma County General Plan buildout, in combination with the proposed project. Potential operational impacts of the proposed project are limited primarily to hydrology and water quality. No other similar projects have been identified that could contribute to the hydrology and water effects analyzed in the SEIR. However, potential cumulative impacts related to fisheries resources considers implementation of the Sonoma County Water Agency's Fish Habitat Flows and Water Rights Project (SCWA 2016) were considered. The Draft SEIR concluded that no signficant cumulative impact would result from implementation of the project.

4.6 GROWTH-INDUCING IMPACTS

The Draft SEIR analyzed the potential for the project to result in growth-inducing impacts. For several reasons, the SEIR concluded that no substantial growth inducement would result from project implementation. These reasons include the limited volume of additional water that would result from project implemetation that would be available to serve new development, the overarching control of

growth in the project area by existing land use regulations. Thus, as detailed in the Draft SEIR, the impact would be less than significant.

4.7 Significant Irreversable Environmental Changes

Project-related construction would involve only minor amounts of energy and fuels for the proposed irrigation pipelines and booster pump station. Most of the project-related construction activities would occur in existing road right-of-ways, and therefore would not result in an irreversible loss of agricultural land or habitat. Furthermore, as detailed in the SEIR, all potentially significant impacts of the project would be reduced to a less-than-significant level with the implementation of recommended mitigation measures. Thus, no significant irreversible environmental changes are anticipated as a result of project implementation.

4.8 Mitigation Monitoring

A Mitigation Monitoring and Reporting Program (MMRP) was prepared for the proposed project (see Public Resources Code, Section 21081.6, subd. [a][1]; CEQA Guidelines Section 15097). The City will use the Mitigation Monitoring and Reporting Program to track compliance with project mitigation measures. The Mitigation Monitoring and Reporting Program will remain available for public review during the compliance period. While MMRP applies the Sonoma County grading and building permit process as a mechanism for implementation of several mitigation measures, each mitigation measure applicable to the project is ultimately under the control and authority of the City of Healdsburg.

5 EVALUATION OF ALTERNATIVES

CEQA Guidelines section 15126.6(a) requires a description of a reasonable range of alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. It also requires an evaluation of the comparative merits of the alternatives. Accordingly, the SEIR prepared for the project evaluated the alternatives outlined, below. The City Council considered the alternatives, but finds them infeasible for specific economic, legal, social, technological, or other reason, as set forth below, pursuant to CEQA Section 21081(a)(3).

The SEIR analyzed two alternatives: (1) the No Project Alternative and (2) the Geysers Pipeline Connection Alternative.

5.1 No Project Alternative

Under the No Project alternative, no expansion of the existing recycled water facilities would occur. However, the No Project alternative would include additional planned facilities and an operational expansion of recycled water activities using existing facilities. Specifically, the No Project alternative includes additional storage at the WRF that would add approximately 15 MG to the recycled water storage capacity at the WRF. Aside from the additional storage to be provided in lined ponds, the No Project alternative would maintain the status quo of the existing recycled water facilities. Additional customers could be added utilizing existing infrastructure, such that additional tertiary-treated water from the WRF could be diverted from discharge into the Basalt Pond (Russian River) and into the recycled water system. Under the No Project alternative, the current program authorizing truck hauling of recycled water for irrigation would cease at the end of 2020.

The relative impacts associated with the No Project Alternatives as compared to the proposed project are summarized in Table 2. As presented in that table, the No Project Alternative would result in a reduction or avoidance of impacts resulting from the project as relates to: biological resources, earth resources, air quality, noise, cultural resources, transportation, greenhouse gas emissions, and wildfire.

5.1.1 FINDING

Under the No Project Alternative, limited construction activities and a modest increase in operational activities would occur as compared to the project. As a result, several impacts associated with the proposed project would be avoided or reduced, as presented in Table 2. For this reason, the Draft SEIR identified the No Project Alternative as environmentally superior to the proposed project. However, because the No Project Alternative would not divert sufficient quantities of tertiary-treated water from discharge into the Basalt Pond, this alternative would not meet the City's primary objective of complying with the seasonal discharge prohibition, or fully meet objectives related to expanding the beneficial reuse of recycled water and preserving groundwater supplies. For these reasons, the City Council rejects the No Project Alternative.

Table 2 – Comparison of Impacts under each Alternative

Environmental Issue Area	No Project Alternative	Geysers Pipeline Connection Alternative
Land Use Consistency, Agriculture, and Forestry Resources	Similar	Similar
Hydrology and Water Quality	Similar	Reduced
Fisheries Resources	Similar	Similar
Biological Resources	Reduced	Reduced
Earth Resources	Reduced	Reduced
Air Quality	Reduced	Reduced
Noise	Reduced	Reduced
Cultural Resources	Reduced	Reduced
Transportation	Reduced	Reduced
Greenhouse Gas Emissions	Reduced	Reduced
Energy	Similar	Similar
Wildfire	Reduced	Reduced

5.2 GEYSERS PIPELINE CONNECTION ALTERNATIVE

The Geysers Pipeline Connection Alternative would convey the tertiary treated water to the existing Geysers Pipeline, a 60-inch-diameter transmission main that passes the west side of the City. Water in the Geysers Pipeline is currently pumped to a well field in the mountains north and east of the City of Healdsburg, where CalPine, Inc. injects the treated wastewater into wells and recovers geothermally-produced steam to generate electrical power. Under this alternative, the recycled water from the City's WRF would be conveyed to the Geysers Pipeline for injection into groundwater wells. To make a connection to the Geysers Pipeline, the City would need to construct approximately 200 feet of 8-inch-diameter pipeline and construct and operate a new booster pump station to force the recycled water into the pipeline. It is anticipated that connection to the Geysers Pipeline would be sufficient to use the entirety of the City's recycled water, some of which may be already allocated to irrigation reuse.

The relative impacts associated with the Geysers Pipeline Connection Alternative as compared to the proposed project are summarized in Table 2. As presented in that table, the Geysers Pipeline Connection Alternative would result in a reduction or avoidance of impacts resulting from the project as relates to: hydrology and water quality, biological resources, earth resources, air quality, noise, cultural resources, transportation, greenhouse gas emissions, and wildfire.

5.2.1 FINDING

As presented in the SEIR and summarized in Table 2, since the No Project Alternative cannot ultimately be designated the environmentally superior alternative, the Geysers Pipeline Connection Alternative would be the environmentally superior alternative because it would avoid or substantially lessen several impacts anticipated under the proposed project. The Geysers Pipeline Connection Alternative would also meet the primary objective of compliance with the seasonal discharge prohibition. However, it would not meet the additional objectives related to expanding the beneficial reuse of reclaimed water via landscape irrigation, agricultural irrigation, or construction use or fully meet the objective of promoting the preservation and protection of existing groundwater and surface water sources. Moreover, according to the Compliance Feasibility Investigation prepared in support of the project and alternatives, the cost to implement the Geysers Pipeline Connection Alternative is approximately $30 million, which includes about $3 million to construct a booster pump station and $27 million for a proportionate share of the capacity cost of the existing pipeline. In comparison, the project costs is estimated to be approximately $2 million. Accordingly, the Geysers Pipeline Connection Alternative is found to be prohibitively expensive and infeasible.

Based on impacts identified in the EIR and throughout this findings document, the City finds that the proposed project is the most desirable, feasible, and appropriate, and rejects other alternatives and other combinations and/or variations of alternatives as infeasible.