



Willow Creek Community Services District
Downtown Wastewater Development Project
Environmental Impact Report Addendum

SCH #2015012014

July 2021

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Introduction

The Final Environmental Impact Report (EIR) for the Downtown Wastewater Development Project (Project) in Willow Creek (State Clearinghouse Number 2015012014) was certified on September 24, 2015 by the Willow Creek Community Services District (WCCSD or District). The lead agency is the WCCSD, the decision-making body being the WCCSD Board of Directors.

The Project would include a gravity wastewater collection system with two pump stations; a recirculating filter treatment system located at the Stockel site; and subsurface disposal (leachfield) at the Stockel site.

In April 2016 following unanticipated changes to the Project Description, the WCCSD decided to prepare an Addendum to the 2015 EIR (State Clearinghouse Number 2015012014). The purpose of the 2016 EIR Addendum was to describe the abandonment of individual septic tanks/leachfields and the installation of 4-inch laterals between existing private sewer systems and the new sewer mainlines. These two Project elements were unintentionally omitted from the 2015 EIR and were therefore not included in the analysis at that time.

In early spring 2021, it became known that additional changes to the Project Description were necessary due to advancement in the Project design. Consequently, the WCCSD has chosen to prepare a second Addendum to the 2015 EIR, inclusive of the analysis performed for the 2016 EIR Addendum, that will disclose and analyze potential environmental impacts that may result from the Project as it is currently proposed (only covering project changes after the first addendum in 2016). This second addendum will be known as the 2021 EIR Addendum.

The following figures are included in Appendix A:

Figure 1: Project Vicinity

The vicinity map shows the general Project location within Humboldt County

Figure 2: Project Elements and Expanded Area of Potential Effect

This figure shows the proposed Project modifications including Project elements (infrastructure), and the expanded Area of Potential Effect (APE) addressed in this 2021 EIR Addendum.

Figure 3: Expanded Service Area

This figure shows the expanded service area of the WCCSD. The inclusion (and anticipated redevelopment) of APN 522-201-001 was accounted for during Project capacity design, however this APN was mistakenly omitted from the service area/sewered area shown in the 2015 EIR and 2016 EIR Addendum.

Applicability and use of an Addendum

The District has determined that the appropriate California Environmental Quality Act (CEQA) document for the proposed revisions to the Project is an Addendum to the original Downtown Wastewater Development Project EIR in accordance with CEQA Guidelines Section 15164(a) which states that a lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR has occurred. Under CEQA Guidelines Section 15162, when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The change in environmental impacts due to proposed Project modifications or changed conditions have been evaluated and measured against the standards set forth in paragraphs 1, 2, and 3 above to determine whether an Addendum is appropriate or a subsequent EIR is needed. The environmental analysis below provides the detailed examination of each of these issues. The conclusion is that none of the circumstances which might require a subsequent or supplemental EIR has occurred, and that an Addendum is, therefore, appropriate. This Addendum should be read together with the full text of the 2015 EIR. Even though modifications to the adopted Project are minor, the modifications have been subjected to a detailed analytical process consistent with the methodology applied in the 2015 EIR. Section 15164 of the CEQA Guidelines provides that an Addendum is the appropriate level of CEQA analysis when the circumstances defined in Section 15162 calling for preparation of a Subsequent EIR do not

occur. None of the circumstances that require a subsequent EIR, such as new significant impacts or significant impacts of a substantially more severe nature, is present. Thus, an Addendum is the appropriate level of CEQA analysis and the appropriate method of amending the 2015 EIR.

Modifications to the Project and Changes in Circumstance

Proposed Modifications to the Project

The following changes to the Project Description have occurred since the preparation of the 2016 EIR Addendum. They represent the subject of the analysis contained in the Environmental Analysis section of this 2021 EIR Addendum document. Please see Figure 2 (Appendix A) for the location of proposed Project modifications.

Additional Roads to Contain Sewer Mains

An additional 1,115 linear feet of existing public roads will be used to contain public sewer mains. These additional areas are found in five distinct locations: State Route (SR) 299 at Willow Glen Road, the northern terminus of Willow Glen Road, SR 96 at Mayfair Street, Willow Way at SR 299 and Country Club Road. Refinement in Project design has made it necessary to locate public sewer mains in these areas. The APE has therefore been expanded to include these areas.

Relocated Wastewater Treatment Plant and Leachfield

The proposed location of the wastewater treatment plant (WWTP) and on-site leachfield has been changed from its original location (Mill Site, analyzed in the 2015 EIR) to a site approximately 700 feet to the east (Stockel Site). The WWTP has not changed in size and its footprint remains at approximately 0.5 acres. This modification to the Project is necessary because the original site was not able to be acquired for the purpose of the Project. The APE has been expanded to include the footprint of the WWTP and on-site leachfield.

Private Sewer Laterals and Abandonment of Existing Septic Tanks

The Project includes the installation of approximately 110 private sewer lateral lines. These 4-inch pipes will connect existing private sewer systems to the proposed public sewer mains located in the public road. When the proposed wastewater treatment system becomes operational, the existing private septic tanks will be abandoned in place per Humboldt County standards because they will no longer be needed. A portion of each new sewer lateral will be located in both the public street and on private property. The sewer laterals will be installed using an open trench technique, or horizontal directional drilling where appropriate, and will be placed at a depth of approximately five feet. The APE has been expanded to include a six-foot swathe of ground surrounding the locations of the proposed sewer lateral lines and the to-be-abandoned septic tanks, and land near the existing WCCSD office to potentially contain a lift station (the lift station has already been considered a component of the Project, however was considered in a different location).

Expanded Service Area

The service area boundary has been expanded to include parcel number 522-201-001 (Mill Site, 42.3 acres), see Figure 3 within Appendix A. This parcel contains a non-operating lumber mill

and has in recent years been used for cannabis cultivation. Existing permanent structures include the approximately 20,000 sf lumber mill. There are no permanent residential uses present on the site. The parcel includes approximately 1,500 linear feet of Trinity River frontage and approximately 40 percent of the parcel is forested. Approximately 40 acres of the parcel is zoned Heavy Industrial (MH) with the remainder zoned Agriculture General (AG). The expanded service area does not result in the need for expansion in the treatment capacity of the WWTP because the WWTP was originally designed with considerations for serving this parcel. The WWTP planned capacity of 38,000 gallons per day (gpd) has not changed. Additionally, the Project does not propose to connect the existing private sewer system located on this parcel to the WWTP at this time. However, the connection will be installed should the owner desire to connect to the municipal wastewater system (WWTP) in the future.

As currently designed, the new wastewater system will largely serve residences and businesses in the downtown district of the community of Willow Creek. The service area includes businesses such as restaurants, medical facilities, a library, video store, consultants, auto parts store, gas stations, etc. There are currently no planned large-scale industrial or commercial facilities that will be contributing high-strength wastewater to the system. If the cannabis facility at the Mill Site ends up producing industrial wastewater, they will be required to get an industrial wastewater pre-treatment permit. The WCCSD will have an ordinance that contains standard pre-treatment requirements prior to discharging to the District's wastewater system. The District will work with the Humboldt County Planning Department if new projects do come up for development. If an industrial facility ends up coming online in the future, the District will communicate with the Regional Water Quality Control Board and plan accordingly. If new facilities would be contributing high-strength discharges to the system that would cause system failures, wastewater plant upsets, or permit violations, they will not be allowed to connect without installing their own sufficient pre-treatment units.

New industrial facilities that would contribute high-strength wastewater to the system are unlikely, as the service area is small, and the County zoning in the service area does not allow for significant industrial activity.

Changed Circumstances

No relevant changes in circumstances, such as new regulations or new reasonably foreseeable relevant cumulative projects, and no new information has been identified such that the evaluation of environmental impacts of the additional service area would be different than identified in the 2015 EIR. An area containing wetlands and an aquatic resource (drainage waterway) was observed within the 2021 expanded APE (GHD 2021), however this area will be avoided. No new special-status species have been identified within the existing and expanded service area (GHD 2021).

Environmental Analysis

This section consists of the 21 environmental resource categories analyzed in the 2015 EIR, each of which presents the analysis of the Project modifications within that environmental discipline. The analysis refers back to the original evaluation of impacts contained in the 2015 EIR and 2016 EIR Addendum and identifies the change in impacts, if any, from the Project approved at that time. If there are no changes to the previous impact evaluation, an explanation for this conclusion is provided (see Air Quality, Energy and Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Population and Housing; Public Services; and Recreation). Most of the information presented in the 2015 EIR has not changed and is not repeated here. Please refer to the 2015 EIR for descriptions of setting, discussion of methodology, and the complete identification and discussion of impacts.

The changes to the Project and the expanded APE (collectively considered Project modifications) are similar in nature to the Project as it was originally proposed and analyzed in the 2015 EIR and the 2016 EIR Addendum. The sewer mains are to be constructed nearly entirely within existing public roads, private laterals are to be constructed in previously disturbed residential yards and commercial parking lots/driveways, and the new location for the WWTP and leachfield is less than 1,000 feet from its original location. Vegetation, soil types, and slopes are also similar. The operation of the proposed WWTP would be the same as described and analyzed in the 2015 EIR, including wastewater treatment processes, system capacity, installation of pipelines, and construction staging.

In review of the Project modifications and expanded APE in context of the 21 environmental resource categories, no new impacts were identified and all mitigation measures are applicable. No mitigation measures needed to be modified. The following is a summary of the key findings.

Aesthetics

The proposed Project modifications do not require revision of the aesthetics resources evaluation. The majority of the Project consists of the installation of underground wastewater piping within existing roads, private yards, and adjacent to the wastewater treatment facility. Upon completion of the Project, there will be no perceptible visual changes to the areas as a result of the Project. The relocated WWTP would remain the same with regard to design and materials but would be located approximately 700 feet east towards Country Club Road. As such, it would be somewhat more visible to southbound traffic on Country Club Road. Views from south of the WWTP (i.e. east/west oriented segment of County Club Road) would remain largely obscured by vegetation. Views from the west and north are substantially the same. The modifications will not result in new significant impacts or substantially more severe significant impacts relative to aesthetic resources.

Agriculture and Forestry Resources

The proposed Project modifications do not require revision of the agriculture and forestry resources evaluation. However, according to the Humboldt County WebGIS (which utilizes soils data from the Natural Resources Conservation Service [NRCS]) it should be noted that the proposed WWTP site expands into soils considered prime agricultural soil (Humboldt County 2021). The former location of the WWTP was also sited within lands with prime agricultural soil,

and therefore the 2015 EIR impact analysis has accounted for this. According to historic aerial imagery, the proposed expansion of the WWTP area has not been actively grazed or farmed since at least 1988 (which is the oldest aerial imagery available), rather it has remained open space. However, it is possible that this area has been used for agriculture prior to 1988. This area has not been mapped by the California Resources Agency under the Farmland Mapping and Monitoring Program, and thus the designation of prime agriculture soil is presented at the County level, based upon federal NRCS data. The proposed expanded area for the WWTP and previous site are both currently zoned Heavy Industrial (MH). Although this area contains prime agricultural soil, it has not been used for agriculture for at least 33 years, and has potentially never been used for agriculture. Therefore it would not be converted out of production because it has not been used for production. The Project elements located within roads do not impact agriculture or forestry resources. The Project modifications would not be constructed on land zoned for agricultural or forestry uses, or land under a Williamson Act contract. Therefore, implementation of the Project would not convert farmland or forest land to other uses, nor conflict with zoning for agricultural or forestry uses. The Project modifications will not result in new significant impacts or substantially more severe significant impacts relative to agriculture and forestry resources.

Air Quality, Energy, and Greenhouse Gas Emissions

The proposed Project modifications do not require revisions to the evaluation of air quality, energy, or greenhouse gas emissions. Project modifications as they relate to air quality, energy, and greenhouse gas emissions are functionally identical to the Project as originally analyzed in the 2015 EIR. Construction techniques, equipment, and the duration of construction activities have not changed. Modifications to the design of the collection system are minor and will not result in a significant increase in the total linear feet of pipe that comprise the system. Though relocated, the size and capacity of the WWTP has not increased. Therefore, Project modifications will not result in new significant impacts or substantially more severe significant impacts relative to air quality, energy, or greenhouse gas emissions.

Biological Resources

The proposed Project modifications do not require revision of the biological resources analysis. The expanded Project APE was surveyed for wetlands, aquatic resources, special-status species and Sensitive Natural Communities in 2021 and findings were summarized in a Biological Resources Evaluation (GHD 2021). Two wetlands and one aquatic resource was observed within the expanded APE, however the Project will avoid this area and have no effect on the wetlands and aquatic resource. No other wetlands, aquatic resources, special-status species, or Sensitive Natural Communities were observed (GHD 2021). Therefore, Project modifications will not result in new significant impacts or substantially more severe significant impacts relative to Biological Resources.

Cultural Resources and Tribal Cultural Resources

The proposed Project modifications have been considered in a separate Cultural Resources Investigation Report specific to the expanded APE (RA 2021). The report found that the expanded APE does not include buildings, structures or features associated with the two

previously documented historic period-built environment resources. Furthermore, these resources have been recommended ineligible for listing in the National Register of Historic Places, and neither is considered to be a historic property. Previous investigations conducted in the expanded APE and vicinity identify one Native American archaeological site and two historic-era road segments, located within 0.5 miles of but outlying the 2021 expanded APE. Native American tribal representatives with interest in the Project's vicinity were contacted and asked to participate in the investigative effort. Correspondence was conducted with representatives of the Hoopa Valley Tribe and Tsnungwe Council (RA 2021). Representatives from the Hoopa Valley Tribe stated that they had no concerns about the expanded Project APE and that they did not believe any tribal cultural resources are known to be present in the expanded 2021 APE (RA 2021). No response was received from the Tsnungwe Council. Therefore, the Project modifications will not result in new significant impacts or substantially more severe significant impacts relative to cultural resources and tribal cultural resources.

Geology, Soils, and Mineral Resources

The proposed Project modifications do not require revisions to the evaluation of geology, soils, or mineral resources. Installing new private lateral lines in existing pre-disturbed yards and paved parking areas, abandoning septic tanks in those same areas, and minor additions to the portions of the existing roads that will contain sewer mains will not result in significant additional impacts to geology, soils, or mineral resources because pipe installation and septic tank abandonment will not result in the introduction of waste material into soils. Rather septic tanks will be emptied prior to being filled with sand or gravel and abandoned. The construction techniques and treatment of excavated material to be employed for pipe installation has not changed. The relocated WWTP will be located in close proximity to the previously proposed location (approx. 700 feet east). The previously proposed location was investigated by geotechnical engineers in 2015 (Crawford 2015) and contains soils and topography which are assumed to be similar to the currently proposed location due to the close proximity (see analysis of exploratory boring #9 in the Geotechnical Report [Crawford 2015]). The volume of excavated materials to be off-hauled and the amount of imported materials associated with the WWTP have not changed. Project modifications would not result in an increased risk to people or structures from seismic activity, additional loss of topsoil, or new structures constructed on expansive soils. Therefore, the Project modifications will not result in new significant impacts or substantially more severe significant impacts relative to geology, soils, or mineral resources.

Hazards and Hazardous Materials

The proposed Project modifications do not require revision to the evaluation of hazards and hazardous materials. Project modifications would not expose employees or persons residing in the area to additional hazards or hazardous materials beyond those previously identified. Therefore, these modifications will not result in new significant impacts or substantially more severe impacts relative to hazards or hazardous materials.

Hydrology and Water Quality

The proposed Project modifications do not require revision to the evaluation of hydrology and water quality. Project modifications would not increase impervious surfaces nor alter the

WWTP's capacity, treatment processes, or disposal method. The relocated on-site wastewater disposal site (i.e. leachfield) was analyzed in the 2015 EIR as an alternative site. Therefore, the modifications will not result in new significant impacts or substantially more severe significant impacts related to hydrology and water quality.

Land Use and Planning

The proposed Project modifications do not require revision to the evaluation of land use and planning. The Project modifications will be located in substantially the same locations (e.g. roads, private yards, etc.) and therefore are consistent with applicable zoning designations analyzed previously. The collection system will be located underground and will therefore have no impact on the mobility of residents nor divide communities. The relocated WWTP and leachfield are located on parcels with the same primary zoning designation (MH) but different underlying general plan land use designations. The former WWTP site has a land use designation of Industrial General (IG) and the proposed WWTP site has a land use designation of Commercial Services (CS). Both of these land use designations support the existing zoning (MH), therefore no impact due to the difference in land use designations would occur. Therefore, the Project modifications will not result in new significant impacts or substantially more severe significant impacts relative to land use and planning.

Noise

The proposed Project modifications do not require revision to the noise evaluation. Noise impacts are associated primarily with the construction phase of the Project and will occur in substantially the same locations (e.g. roads, private yards, etc.) as what was considered in the 2015 EIR and 2016 EIR Addendum. Noise produced during the construction of the relocated WWTP may be experienced more acutely by a cluster of homes east of the Project site on Flower McNeil Road. However, construction noise will be temporary, and noise will attenuate between the source and receptors. Underground utilities located within roads will not produce operational noise and the operational noise produced by the WWTP and lift station would not fluctuate from what was previously analyzed, which was well below the established thresholds. Therefore, the Project modifications will not result in new significant impacts or substantially more severe significant impacts relative to noise.

Population and Housing

Proposed changes to the Project and the APE do not require revision to the evaluation of population and housing. Project modifications will not induce substantial unplanned population growth because there is no proposed change in land use. Project modifications, like the Project as originally proposed, result in the creation of a WWTP to support existing and infill development consistent with current land use regulations. Allowable development density and intensity will not increase as a result of Project modifications. Therefore, Project modifications will not result in new significant impacts or substantially more severe significant impacts relative to population and housing.

Public Services

Proposed changes to the Project and APE do not require revision to the evaluation of public services. The modifications will not change the demand for public services nor the potential disruption of emergency services that was analyzed in the 2015 EIR. Construction activities that are to occur within roads will be managed to allow emergency vehicle access, as was considered in the 2015 EIR. Emergency vehicles will still be able to access the relocated WWTP from Country Club Road. Therefore, the Project modifications will not result in new significant impacts or substantially more severe significant impacts to public services.

Recreation

Proposed Project modifications do not require revision to the evaluation of recreation, because the modifications will not temporarily or permanently impact recreational opportunities. The relocated WWTP site is privately-owned and has no history of hosting recreational uses. Therefore, Project modifications will not result in new or significant impacts or substantially more severe significant impacts relative to recreation.

Transportation

Proposed Project modifications do not require revision to the evaluation of transportation. Construction-related impacts are anticipated to be nearly identical to what was analyzed in the 2015 EIR and 2016 EIR Addendum. Access to the relocated WWTP will continue to be from Country Club Road. Anticipated staffing levels (that could potentially generate traffic) will not increase as a result of Project modifications. The Project modifications fall far below the screening threshold of 110 vehicle trips per day established in the Office of Planning and Research VMT Technical Advisory (OPR 2018). Therefore Project modifications will not result in new or significant impacts or substantially more severe significant impacts to transportation.

Utilities and Service Systems

The proposed Project modifications do not require revision to the evaluation of utilities and service systems. The Project itself represents the new construction of a WWTP to support both existing and future development. As described in Section 5.1 (Development of Design Flows) of the 2014 Preliminary Engineering Report, the system was designed to accommodate an Average Dry Weather Flow of 38,000 gpd (GHD 2014). This figure was based on considerations for existing residences and businesses anticipated to be served by the project as well as potential infill, expansion, and development at the Mill Site. The system capacity analyzed in the 2015 EIR has not changed and accounts for potential future contributing flows from the Mill Site. Therefore, the modifications will not result in new or significant impacts or substantially more severe significant impacts relative to utilities and service systems.

Wildfire

The proposed Project modifications do not require revision to the evaluation of wildfire. Project modifications within roads will have no impact on wildfire risk during the construction or operational phases of the Project. The Fire Hazard Severity Zone of the proposed WWTP site is

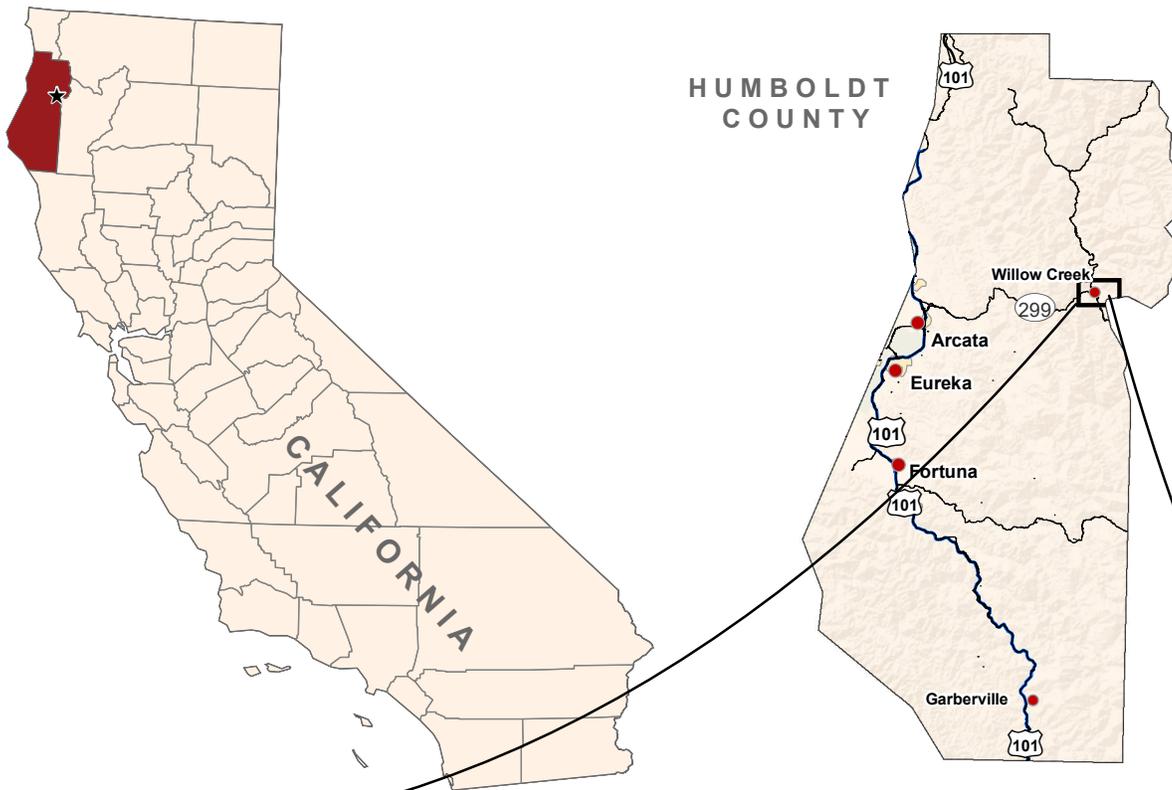
the same as the originally proposed location. Therefore, the modifications will not result in new or significant impacts or substantially more severe significant impacts to wildfire.

References

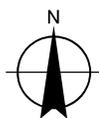
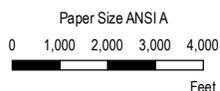
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Appendix A

Figures



Legend
 ★ Project Location

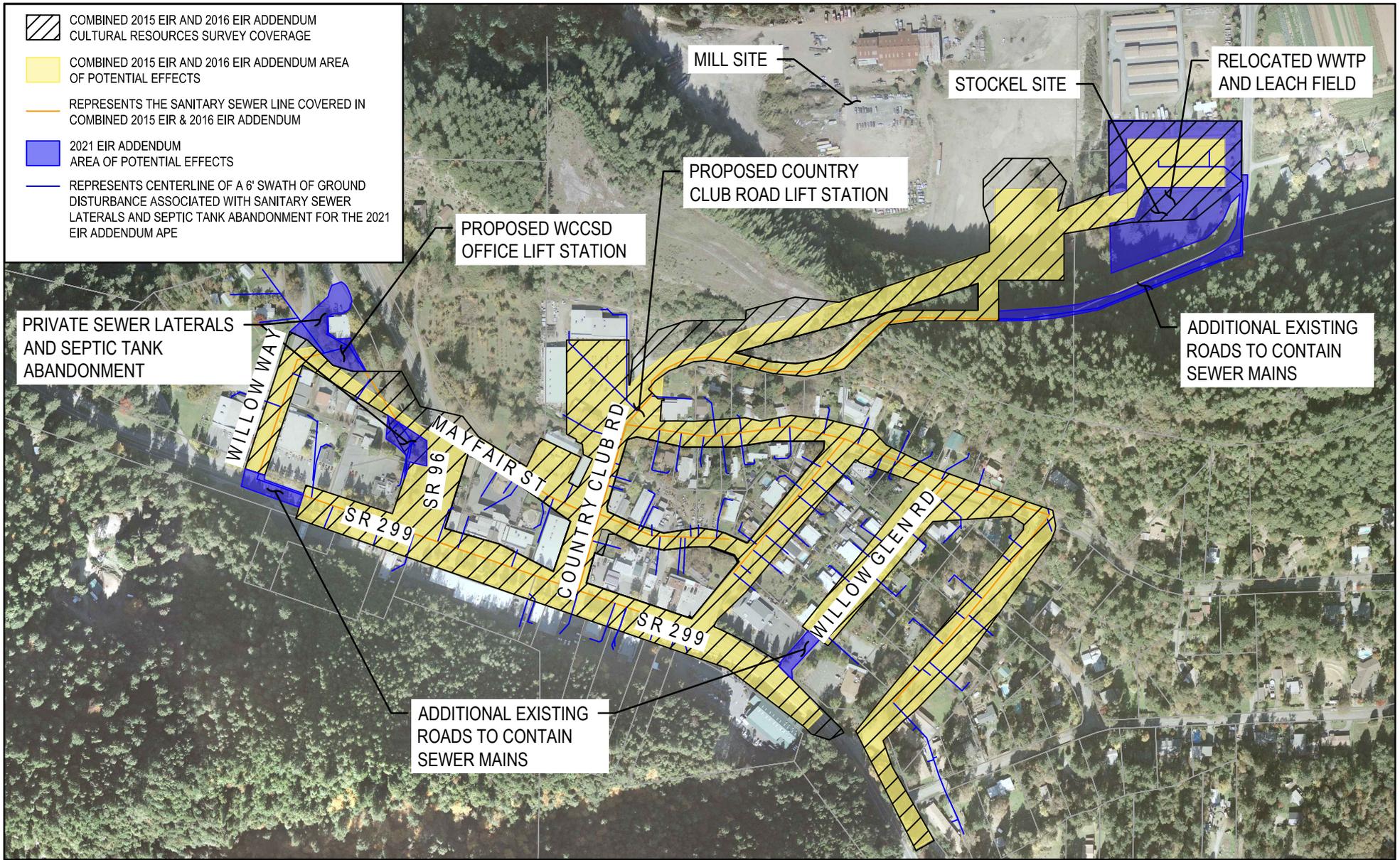


**Willow Creek Community Service District (WCCSD)
 Downtown Waste Water Development Project**

Project No. 11151183
 Revision No. -
 Date June 2021

Project Vicinity

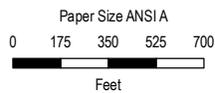
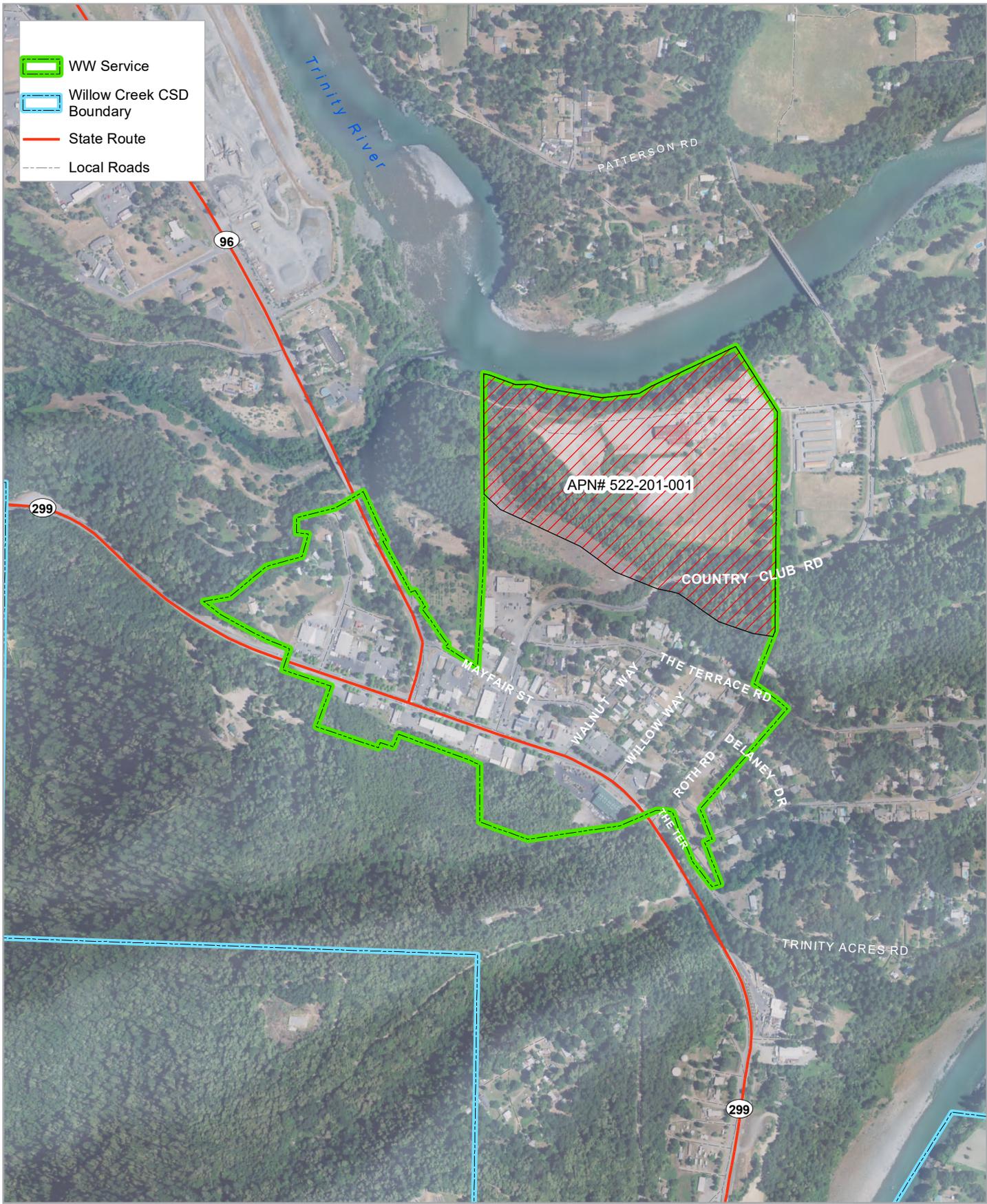
FIGURE 1



Willow Creek Community Services District
DOWNTOWN WASTEWATER COLLECTION AND
TREATMENT SYSTEM

2021 EIR ADDENDUM
AREA OF POTENTIAL EFFECTS
FIGURE 2

Project No. 11151183
Report No. -
Date 2/10/2021



**Willow Creek Community Services District
Downtown Wastewater Development Project**

Project No. 11151183
Revision No. A
Date June 2021

Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
Grid: NAD 1983 StatePlane California I FIPS 0401 Feet

**Waste Water
Service Area Map**

FIGURE 3

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