City of Calistoga

Calistoga Riverside Ponds Relocation Project Addendum No.1 to Previously Adopted Initial Study/Mitigated Negative Declaration

January 2024

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City of Calistoga

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City of Calistoga Public Works Department

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1 Introduction and Description of Project Modification

1.1 Overview

The City of Calistoga is proposing the Riverside Ponds Relocation Project (project). The City adopted an Initial Study/Mitigated Negative Declaration (IS/MND) in compliance with the California Environmental Quality Act (CEQA) for the project in November 2019 (SCH 2018089100). The project that was analyzed in the 2019 IS/MND is referred to in this addendum as the "approved project." The IS/MND addressed relocation of four existing riverside ponds and associated water conveyance and treatment utilities at the Dunaweal Wastewater Treatment Plant (WWTP); realigning river channels away from WWTP infrastructure, restoring a vegetated riparian buffer, and stabilizing channel banks between the riverside ponds and headworks structure and the adjacent active river channels to protect the facilities from subsequent erosion. The primary objectives of the Calistoga Riverside Ponds Relocation Project are to:

- Line the ponds to prevent percolation and meet Cease and Desist Order requirements from the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB).
- Reduce the risk of failure of headworks and riverside pond due to flooding and associated bank erosion.
- Raise the berms along the East and West ponds to move the ponds out of the 100-year floodway and floodplain.
- Improve stormwater conveyance at the project site, and to separate stormwater and wastewater outflows, currently comingled in the outfall pipe into the Napa River.

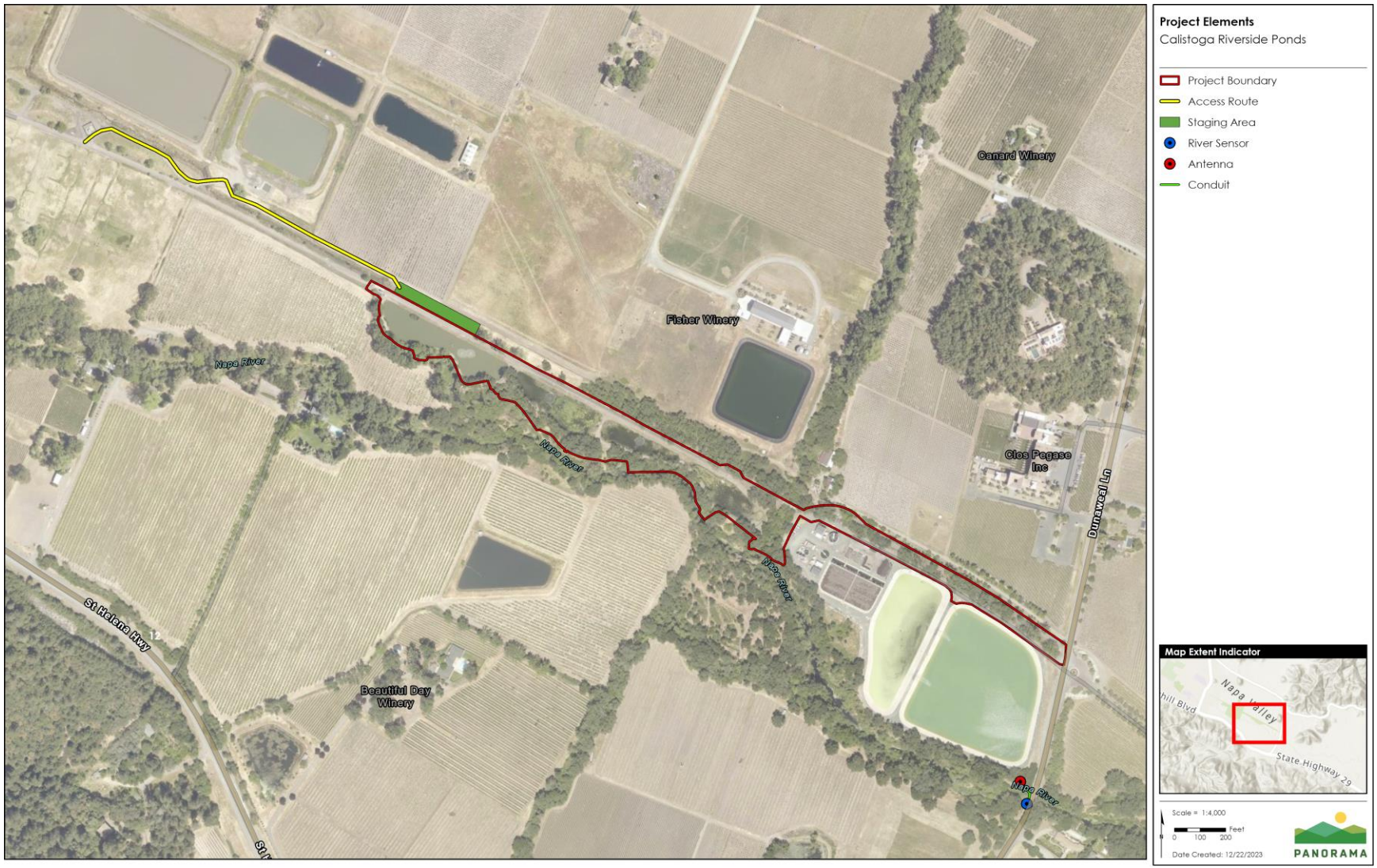
Since the IS/MND was adopted in 2019, the City has decided to add a new temporary on-site staging area and access route to assist with project construction and a new river level sensor to identify water levels within the Napa River downstream of the WWTP during operation. This addendum addresses provides an environmental evaluation under the CEQA for the new staging area, access route, and river level sensor that would be added to the project.

1.2 Project Location and Existing Uses

1.2.1 Staging Area

As shown in Figure 1, the proposed 0.45-acre staging area is located adjacent to the existing project footprint, north of existing pond 4 and on the north side of the Napa Valley Vine Trail. The proposed staging area would be located on City property that is regularly used for material storage and stockpiling activities associated with operation of the WWTP. The staging area has been previously disturbed.

Figure 1 Proposed Addendum Components



1.2.2 Access Route

The proposed temporary access road is located north of the Napa Valley Vine Trail and connects the existing project site to the City's off-site treated water storage facility. The proposed temporary access road includes existing paved, gravel, and overland access roads that are used by the City to access the WWTP and treated water storage ponds. The proposed temporary access road is shown in Figure 1. Photos of the proposed temporary access road area are included in Figure 2.

1.2.3 River Level Sensor

The proposed river level sensor would be located over the Napa River, fastened to the existing Dunaweal Lane bridge. Figure 1 shows the location of the stream gauge and its relation to the project site. The river level sensor would connect to a small solar panel, located just outside of the City's property for the wastewater treatment plant in the County ROW.

1.3 Proposed Project Modifications

1.3.1 Project Modifications

The proposed modifications to the project include the addition of a new on-site staging area, temporary construction access road, and stream gauge. The proposed staging area is located immediately adjacent to the project site on the northern side of the Napa Valley Vine Trail. An off-site staging area 0.4 miles away from the project was already approved; however, the City is proposing to add a new on-site staging area to provide material and equipment storage closer to active construction activities. The new temporary access road would provide an additional access route between the off-site staging and stockpiling areas and the project site.

Additionally, the City of Calistoga is proposing the installation of a radar river level sensor to measure water level and speed of flow in the Napa River. The river level sensor would be installed at the existing Dunaweal Lane bridge, attached to the bridge deck with securing straps. The device would hang directly under the bridge deck and would not touch the water. Electrical conduit would be installed along the bridge deck and then extend approximately 50 linear feet via underground trench to a new mast installed in a concrete foundation. The foundation would be 1.5 feet in diameter and 3 feet deep and secures a mast arm which would house a solar panel to power a radio antenna and battery enclosure. The conduit trench would be approximately 3 feet deep.

1.3.2 Construction

Staging Area

The staging area would be established during site preparation activities. Staging area establishment would involve installation of temporary fencing around the boundary of the staging area. No grading, vegetation removal, or ground disturbance would be required to establish the staging area. Secondary containment structures would be installed around the staging area.

Figure 2 Existing Temporary Access Road Conditions (December 2023)

Proposed activities at the on-site staging area are consistent with the staging area activities evaluated in the previous IS/MND and include:

- Overnight parking and temporary storage of construction equipment applicable for the project
- Temporary storage of construction materials including rebar, wood, masonry materials, greases, oils, trash receptacles and other miscellaneous raw construction materials
- Temporary restroom facility for construction crew

Following construction, the staging area would be restored to pre-construction conditions. Temporary fencing, materials, and equipment would be removed from the site.

Temporary Access Road

A new temporary access road would be used to provide construction access between the project site and the off-site staging and stockpile areas. The new temporary access road is shown in Figure 1. Construction traffic, including haul trucks, would use the proposed access road to transport loads that exceed the size and capacity limits of the Napa Vine Trail bridge over Oat Hill Mine Ditch.

The proposed access road is a combination of existing gravel and disturbed overland roads that traverse City-owned land between the City's WWTP and water storage ponds. The access road is maintained regularly, including mowing of the overland segment of the route. No improvements to the proposed access road would be necessary.

River Level Sensor

To install the radar river level sensor, a construction crew member would access the underside of the Dunaweal Lane bridge on foot and attach the sensor using securing straps. A small electrical conduit would be installed along the bridge deck and then extend approximately 50 feet to a new mast in a concrete foundation. The underground conduit would be installed approximately 3 feet underground using an open cut trench. Native soil would be backfilled to close up the trench.

The 1.5-foot-diameter concrete foundation would be poured to a depth of approximately 3 feet. After the foundation has cured, a mast arm, a solar panel, radio antenna, and battery would be installed.

1.3.3 Project Operations

Staging Area and Access Route

After construction, the staging area and overland portions of the access route would be restored to pre-construction conditions. Since these areas are currently used for access and material storage, restoration of the areas is anticipated to include removal of fencing and any materials stored at the on-site staging area. No activity is proposed during project operation.

River Level Sensor

Operation of the river level sensor would not require staff to be present. City staff would occasionally walk down to the stream gauge to conduct regular and as-needed maintenance, which would involve checking the securing straps and ensuring equipment is functioning properly. Maintenance activities are not anticipated to require any equipment other than hand tools.

2 CEQA Framework for Addendum

The CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3) recognize the possibility for a project to be modified after an Environmental Impact Report (EIR) has been certified or a Negative Declaration has been adopted, and identify various levels of additional environmental review that may be undertaken to provide appropriate environmental disclosure. Pursuant to Section 15164 (b) of the CEQA Guidelines, "An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for preparation of a subsequent EIR or negative declaration have occurred." Pursuant to CEQA Guidelines Section 15162, a subsequent EIR or negative declaration is required when:

1. Substantial changes are proposed in the project which will require major revision 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 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 or negative declaration;
    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.

Pursuant to CEQA Guidelines Section 15164(b), "an addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred."

3 Comparison of the Approved and Modified Project

3.1 Overview

The IS/MND (Appendix A) determined that the approved project could result in potentially significant impacts to the following resources:

- Aesthetics
- Air quality
- Biological resources
- Cultural and tribal cultural resources
- Geology and soils
- Hydrology/water quality
- Noise
- Public services
- Recreation
- Transportation/traffic
- Utilities and service systems
- Wildfire
- Mandatory findings of significance

Design features incorporated into the project, compliance with existing regulations and permit conditions, and implementation of the adopted mitigation measures (Appendix B) were determined to reduce potentially significant impacts of the approved project to a less-than-significant level.

The analysis below evaluates whether modifications to the approved project would result in a new or substantially more adverse significant effects or require any new mitigation measures not identified in the IS/MND requiring preparation of a subsequent environmental document pursuant to CEQA Guidelines Section 15162. The analysis focuses on environmental resources that could be affected by the construction and operation of the modified project components. Resources that are not anticipated to be affected by the modified project components are listed in Table 1 and are not discussed in detail in Section 3.2.

Table 1 Resources Not Affected by Modified Project Components

Resource	Rational for Exclusion from Detailed Analysis in Section 3.2
Agriculture and Forestry	The modified project would not affect agricultural and forestry resources. No agricultural or forestry resources are in the location of the modified project components.

Energy	The modified project would not increase use of energy resources. Addition of the on-site staging area would reduce fossil fuel use due to the shorter distance of travel between the work location and material storage areas.
Geology and Soils	Modified project activities would be located in the same location as the approved project and would not change the potential for exposure to geologic hazards. Modified project activities do not involve extensive ground disturbance.
Greenhouse Gas Emissions	The modified project would not increase the greenhouse gas emissions generated by the project. Addition of the on-site staging area would reduce fossil fuel use due to the shorter distance of travel between the work location and material storage areas.
Hazards and Hazardous Materials	The modified project would not use, transport, or store any new hazardous materials that were not analyzed in the adopted IS/MND.
Hydrology and Water Quality	The modified project would not involve extensive ground disturbance within drainages or waterways. The modified project would not affect drainage patterns on site or within surface waters.
Land Use and Planning	The modified project would not change land use or zoning within the project area. The modified project would not divide a community or conflict with any land use plans.
Mineral Resources	The modified project would not change the availability of mineral resources within the project vicinity.
Noise	The modified project would not result in the creation of construction or operation noise at any new sensitive receptors. No new sources of vibration would result from the modified project.
Population and Housing	The modified project would not affect housing and would not result in any changes to local populations.
Public Services	The modified project would not affect public services.
Recreation	The modified project would not affect recreational resources. No recreational resources are located in the modified project area.
Transportation and Traffic	The modified project would not affect transportation on public roads. The temporary access road would connect to the same public roads that were previously analyzed.
Utilities and Service Systems	The modified project would not affect utilities.
Wildfire	The modified project would not affect wildfire response or preparedness.
Mandatory Findings of Significance	The modified project would not affect mandatory findings from the adopted IS/MND.

3.2 Environmental Effects of the Modified Project

3.2.1 Aesthetics

As documented in the IS/MND, the approved project would have less-than-significant impacts related to aesthetics during construction and operation, with implementation of mitigation measures necessary. The modified project staging area and temporary access road would only affect aesthetics during project construction. The river level sensor would be permanent.

As with the approved project, construction impacts would be minimal and temporary. The modified project impacts would be similar in nature to construction impacts assessed in the IS/MND. The modified project would not be visible from scenic vistas analyzed in the IS/MND, including Siverado Trail. The modified project would also not be visible from any designated state scenic highways or designated scenic corridors.

Staging and access activities would be visible from the publicly accessible vantage points on the Lower Washington Street Bike Path of the Napa Valley Vine trail during construction. Construction activities associated with the modified project would be consistent with those analyzed in the IS/MND. No additional tree removal would be necessary. Since the staging area and overland access route are occasionally used during routine maintenance activities at the WWTP, views of material storage in the on-site staging area and haul trucks driving on the temporary access road would not be out of the ordinary for the area. Following construction, the staging area and temporary access road would be restored to pre-construction conditions.

The river level sensor would be installed under the existing Dunaweal Lane bridge. A small mast arm, solar panel, radio antenna, and battery would be installed near the bridge and may be visible to pedestrians walking on the bridge. Although the solar panel, antenna, and battery could be visible from the bridge, the equipment would be very small in footprint to the existing river gauge and would not detract from the surrounding visual character.

Determination: **No new significant environmental effects, or a substantial increase in the severity of previously identified significant effects, would occur. No new mitigation measures are required.**

3.2.2 Air Quality

As documented in the IS/MND, the approved project would have less-than-significant impacts related to air quality with implementation of mitigation measures.

Project-related emissions would be generated from the use of heavy-duty diesel off-road construction equipment and from vehicle trips associated with removal of any contaminated excavated material and the delivery of clay material from the stockpile location, delivery of rock material, and delivery of other materials and equipment to the Project site, and from daily construction worker commute trips.

The IS/MND analyzed air quality emissions from the approved project and determined that fugitive dust generated by the project would be a significant impact without implementation of dust control measures developed by the Bay Area Air Quality Management District (BAAQMD).

Use of the modified project temporary access road would generate minor amounts of dust when haul trucks and heavy equipment drive on gravel roads. Dust is also possible along the overland segment of the temporary access road; however, the amount of dust generated is anticipated to be very minimal because the overland segment is vegetated with grasses. As with the approved project, dust generated by modified project activities would be mitigated through implementation of Mitigation Measure AQ-1, *Implement BAAQMD Basic Construction Mitigation Measures*. The IS/MND determined that implementation of AQ-1 would mitigate fugitive dust impacts to a less-than-significant level.

The IS/MND analyzed the approved project's incremental toxic air contaminant (TAC) exposure risk to sensitive receptors within a 1,000-foot radius and determined that the approved project would generate diesel particulate matter (DMP), which is considered to be a TAC, during material hauling and delivery, and use of off-road equipment. A health risk assessment was prepared to support the IS/MND analysis and determined that the maximum exposed individual (MEI) in the project vicinity would be exposed to an incremental cancer risk of 1.1 on 1 million, which is below the BAAQMD threshold of 10 in 1 million. The maximum annual average PM2.5 exhaust concentration would be up to 0.007 µg/m3 at the MEI, which is below the BAAQMD's significance threshold of 0.3 µg/m3. TAC exposure from the approved project's construction emissions would result in a maximum chronic hazard index of 0.005, which is below the BAAQMD threshold of 1.0.

The modified project is anticipated to minimally reduce TAC emissions anticipated for the approved project. The addition of the on-site staging area would reduce air quality emissions by reducing the number of vehicle and equipment trips between the project site and the off-site staging area. The temporary access road would be approximately 50 feet further away from the MEI. No access improvements would be required for the modified project access route other than mowing vegetation.

Installation of the river level sensor would not increase TAC emissions. All construction activities associated with installation of the river level sensor would be completed using hand tools that would be manually or battery powered. The installation of the river level sensor is anticipated to take up to three days.

Determination: **No new significant environmental effects, or a substantial increase in the severity of previously identified significant effects, would occur with implementation of Mitigation Measure AQ-1.**

3.2.3 Biological Resources

As documented in the IS/MND, the approved project would have less-than-significant impacts related to biological resources with incorporation of mitigation measures.

The approved project identified potentially significant impacts to rare plants and special status wildlife, including aquatic wildlife, nesting birds and roosting bats. The approved project would also have the potential for significant impacts to riparian woodland, a sensitive natural community.

The special-status species that may occur within the staging area, temporary access road, and river level sensor area include:

- Plants
  - Colousa layia (*Layia septentrionalis)*
  - Marsh microseris (*Microseris paludosa*)
  - Baker's navarretia (*Navarretia leucocephala* ssp. *bakeri*)
  - Napa bluecurls (*Trichostema ruygtii*)
- Wildlife
  - Foothill yellow-legged frog (*Rana boylii)* – dispersal habitat only
  - California red-legged frog (*Rana draytonii*) – dispersal habitat only
  - Western pond turtle (*Emys marmorata*) – dispersal habitat only

The modified project does not involve vegetation removal and would not impact aquatic wildlife. None of the modified project activities would require work within wetted channels. The modified project would not involve removal of trees or other vegetation or structures that could be used for bird nesting or bat roosting.

The modified project involves the establishment of a temporary staging area and access road within areas that have been previously disturbed. Areas of previous disturbance have a lower likelihood of supporting special-status plant and wildlife species; however, special status species may still occur within the modified project areas.

Installation of the river level sensor would not impact aquatic resources because the sensor would be installed on the bridge instead of in the river. Installation of the antenna mast foundation would involve minor disturbance to the upper bank of the Napa River. The mast with solar panel, battery, and radio antenna would be installed along the upper bank of the Napa River using hand tools (e.g., shovel) to install the small concrete base and to bury the small conduit. Removed soil would be replaced after installation of the mast base and conduit. The bank may serve as dispersal habitat for special-status amphibians and reptiles.

As required by Mitigation Measures BIO-1, *Protection of Rare Plants,* and BIO-2, *Protection of Special-status Wildlife,* a biologist would be required to construct a pre-construction survey for rare plants and special status species within the work area prior to any construction activity. In addition, temporary exclusion fencing would be required around the project site to exclude

special-status amphibians and reptiles from the project site. If rare plants or special-status wildlife are observed during pre-construction surveys or during construction, work within the vicinity of the individual would halt until appropriate avoidance measures are implemented in coordination with applicable wildlife agencies, including California Department of Fish and Wildlife and United States Fish and Wildlife Service.

Determination: **No new significant environmental effects, or a substantial increase in the severity of previously identified significant effects, would occur with implementation of Mitigation Measures BIO-1, BIO-2.**

3.2.4 Cultural and Tribal Cultural Resources

As documented in the IS/MND, the approved project would have less-than-significant impacts related to cultural and tribal cultural resources, with implementation of mitigation measures. No known historic or archaeological resources occur within the project disturbance area. No tribal cultural resources have been identified in the project area through archival research, field survey, or Native American consultation. The approved project has the potential to impact previously unidentified archaeological resources during ground-disturbing activities.

Consistent with the approved project, the modified project would not impact any known historical or archaeological resources. The records search that was conducted for the approved project involved a search of the project site and a 0.25-mile radius around the project site. No previously recorded historical or archaeological resources occur within the modified project areas.

The modified project involves use of previously disturbed areas that are periodically used for access and storage of materials during WWTP maintenance activities. The modified project would not involve extensive ground disturbance; however, a small amount of ground disturbance would be required to install the river level sensor antenna mast foundation and conduit. The potential to encounter previously undiscovered historical or archaeological resources, or human remains, during modified project activities are the same as was discussed in the IS/MND for the approved project and the same mitigation measures would apply. Mitigation Measure CR-1, *Unanticipated Discovery Protocol for Archaeological Resources* and Mitigation Measure CR-2: *Unanticipated Discovery Protocol for Human Remains* would be required if any unanticipated cultural resources discoveries are made during construction. These measures require the contractor to stop work within the vicinity of the discovery until an archaeologist or the Napa County Coroner can inspect the find and determine an appropriate course of action. The impact from the modified project would be consistent with the approved project.

Determination: **No new significant environmental effects, or a substantial increase in the severity of previously identified significant effects, would occur with implementation of Mitigation Measures CR-1, CR-2.**

4 Determination

Based on substantial evidence documented in this Addendum, the City of Calistoga, as lead agency, has determined that the proposed modifications would not change the conclusions in the adopted MND. No new potentially significant impacts would occur, and the modified project would not increase the severity of previously identified potentially significant impacts.

None of the conditions described in Section 15162 of the CEQA Guidelines apply to the project as amended, and the proposed revisions to the project necessitate only minor technical changes or additions to the previously adopted MND. Therefore, preparation of an Addendum to the adopted MND provides an appropriate level of environmental review.

5 References

ESA. 2019. "Calistoga Riverside Ponds Relocation Project." Initial Study and Mitigated Negative Declaration. November.