

NOTICE OF PREPARATION — Extended response date of **November 22, 2023** provided to match dates shown in the newspaper public notice

October 17, 2023

From: Santa Clara Valley Water District 5750
Almaden Expressway
San José, CA 95118

Subject: Notice of Preparation of a Draft Subsequent Environmental Impact Report

Project Title: Pipeline Maintenance Program (PMP)

Project Location: Santa Clara County, and limited portions of San Benito and Merced Counties, California.

The Santa Clara Valley Water District (Valley Water) will be the Lead Agency and will prepare a Subsequent Environmental Impact Report (EIR) for the proposed Pipeline Maintenance Program (PMP or Project). Responsible and trustee agencies, and other interested agencies, organizations, and individuals, are invited to provide written comments on the scope and content of the Draft EIR.

The project description, location, and potential environmental effects are contained in the attached materials. An Initial Study was not prepared.


Due to the time limits mandated by State law, your response must be sent at the earliest possible date but **not later than Thursday, November 16 22, 2023**. Please include a name and contact information, to receive further information on this proposed Project, or in the event there are questions.

A scoping meeting will be held at **2:30 pm on November 2, 2023**, online via Zoom at: <https://us02web.zoom.us/j/85198951440>

Or dial by phone: 1-253-205-0468, Meeting ID: 851 9895 1440

Please send your comments to: Michael F. Coleman, ACIP
Environmental Planner
Valley Water
5750 Almaden Expressway
San José, CA 95118
(408) 630-3096
MColeman@valleywater.org

Subject Line: PMP EIR Scoping Comments

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10/17/23

Rick L. Callender, Esq. Date
Chief Executive Officer

Date:

Notice of Preparation of Draft Subsequent Environmental Impact Report for the Pipeline Maintenance Program

1.1 Introduction and Background

The Santa Clara Valley Water District (Valley Water) owns, operates, and maintains raw, treated, and recycled water conveyance pipelines throughout Santa Clara County as well as in small portions of San Benito and Merced counties. These conveyance pipelines and their appurtenances are routinely inspected and maintained, repaired, and/or replaced on an as-needed basis. To standardize implementation and centralize documentation of the inspections and preventative and corrective maintenance procedures, Valley Water established their existing Pipeline Maintenance Program (existing PMP), which included preparation of a procedural manual, in 2007. The PMP activities were evaluated in an Environmental Impact Report (EIR), which was certified by the Valley Water Board of Directors in 2007. The existing PMP has been successfully implemented over the last 16 years; however, maintenance processes and tracking system technology in the pipeline related industry have been updated. In parallel, since 2007, Valley Water has updated its internal processes, organizational structure, and district-wide objectives related to pipeline maintenance programs to accommodate the use of newer and more efficient system management software. To modernize the existing PMP and encompass and standardize all pipeline-related activities under a single program, Valley Water is developing an updated Pipeline Maintenance Program (updated PMP or Program) and an associated Program Manual (updated PMP Manual). The updated PMP Manual would expand upon the existing PMP Manual to include capital pipeline projects and long-range planning efforts by Valley Water; establish new workflow processes and procedures; reflect updates to Valley Water's maintenance techniques, activities, and best management practices (BMPs); and identify updated Program documentation requirements.

Because many of the activities covered in the updated PMP would be similar to those activities covered in the existing PMP, Valley Water is preparing a Subsequent Environmental Impact Report (SEIR) for the updated PMP in compliance with the California Environmental Quality Act (CEQA) to inform the Board's decision on whether to approve the Program. The PMP EIR will analyze environmental effects at a program level to allow Valley Water to consider broad effects, alternatives, and program-wide mitigation measures on a program-wide basis. The PMP EIR will also analyze certain components of the Program about which more detail is known at the project level to ensure analysis of all potential impacts and reduce the likelihood of needing to prepare future additional CEQA documentation.

1.2 Program Area

The area covered under the PMP is shown in Figure 1 and primarily encompasses Santa Clara County with limited portions in San Benito and Merced counties. The work area subject to the PMP includes the areas around water conveyance system pipelines and related appurtenances, including streams, fields,

storm drains, and channels where release of water during pipeline draining for maintenance activities can occur. Conveyance system components are located in Valley Water right-of-way or public utility easements.

Two of the pipeline facilities covered under the PMP, the Santa Clara Conduit and Pacheco Conduit, are federal facilities owned by the U.S. Bureau of Reclamation (Reclamation) but are operated and maintained by Valley Water under formal agreement. These two pipelines are part of the San Felipe System which delivers raw water from the Pacheco Pumping Plant, at the San Luis Reservoir near State Route Highway 152, to the Coyote Pumping Plant, located in the City of Morgan Hill.

Valley Water also manages recycled water conveyance in partnership with the South County Regional Wastewater Authority, the City of Gilroy, and the City of Morgan Hill for the South County Recycled Water Pipeline system, and with the City of Sunnyvale for the Wolfe Road Recycled Water Pipeline.

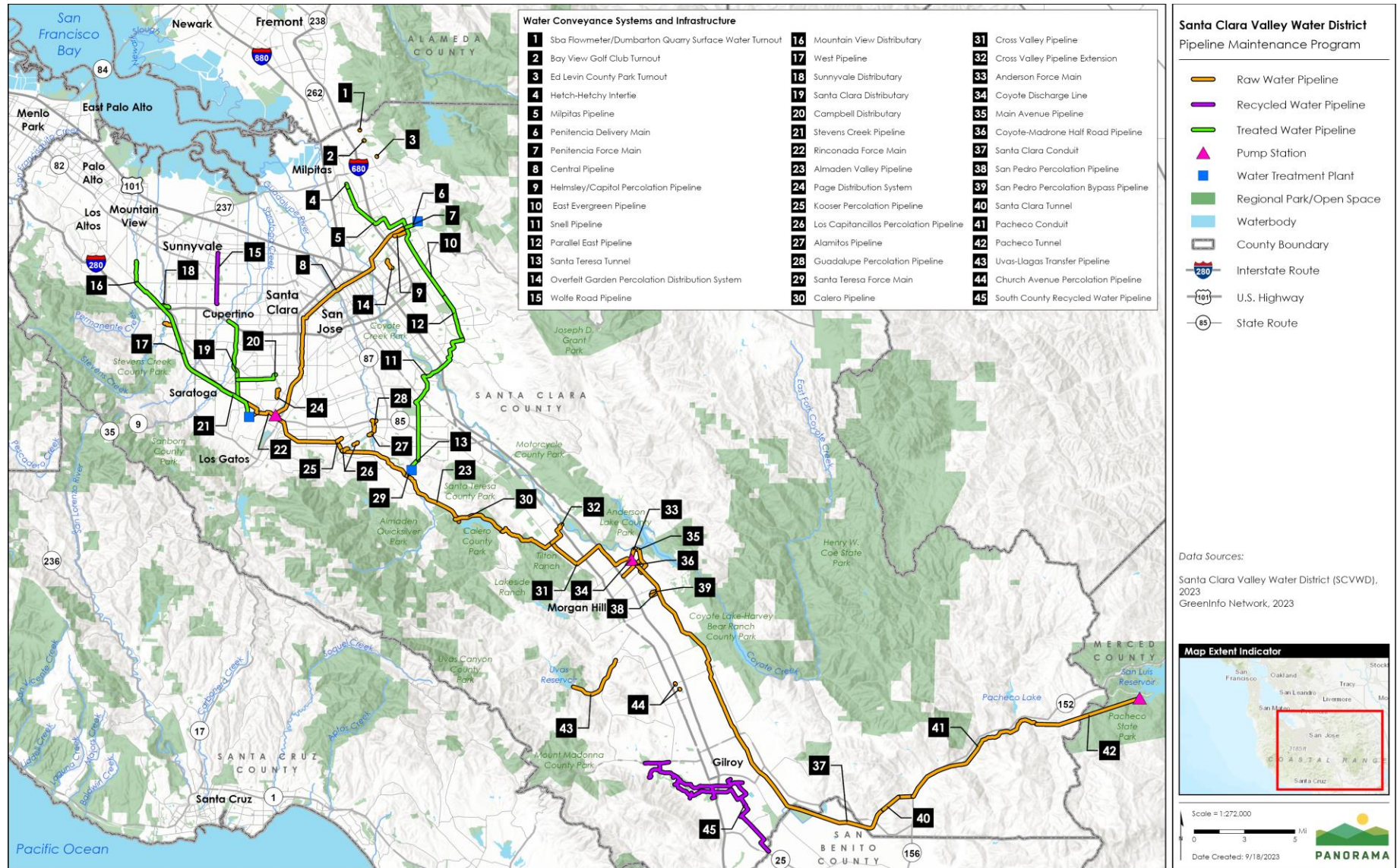
1.3 Program Purpose and Objectives

The overall goal of the PMP is to maintain Valley Water’s facilities and infrastructure that are required to meet Valley Water’s obligation to deliver safe and reliable service as a water purveyor. The PMP also serves as a policy guide for pipeline maintenance in the context of Valley Water’s overall Ends Policies¹. The objectives of the PMP are to:

1. Define standard practices and procedures for maintenance activities associated with Valley Water’s conveyance systems;
2. Enhance operational flexibility and adaptive management opportunities for evaluating and improving the maintenance activities defined in the PMP through learned experiences and successive planning over time;
3. Streamline the environmental documentation and local, State, and federal permit processing where required to facilitate efficient and timely maintenance and repair of the pipeline system.

¹ Valley Water plans, manages, and carries out work to meet policies established by its Board of Directors. Under Valley Water’s form of Policy Governance, these “Ends” policies describe the mission, outcomes, or results to be achieved by Valley Water staff. Balancing the Ends policies are Executive Limitations, which set limits on staff activities in fulfilling the Ends. Alignment of plans and resources with the Ends policies helps the Board fulfill the critical responsibility of defining, balancing, and prioritizing “what benefits, for what people, at what cost,” and enhances Valley Water staff’s accountability in using budgeted resources to accomplish those ends.

Figure 1 Program Area and PMP System



1.4 Project Description

The PMP is divided into the two major types of activities, Performance of Inspections and Maintenance of Facilities, which are described in further detail below.

- **Performance of Inspections.** Pipeline and facility inspections can be either external or internal (on the surface or outside of a pipeline or facility, or inside a pipeline or other facility). Inspections are needed to ensure the operability of pipelines or their associated facilities and, in many cases, to determine what type of maintenance may be needed based on conditions observed during the inspection.
- **Maintenance of Facilities.** Maintenance, which includes the repair, replacement, rehabilitation, or installation of the pipeline systems and facilities, can be preventative or corrective.
 - Preventative maintenance includes scheduled maintenance of wearable parts, usually to manufacturers' specifications or to known and operable standards. The purpose of preventative maintenance is to sustain equipment at an operable level to minimize the chances of failure or breakdown.
 - Corrective maintenance, in a non-emergency situation, could involve replacing parts of the pipeline that have failed, such as air release valves or electrical components, or could include repair work made necessary by a natural or manmade event. Corrective maintenance can also include excavation work, as necessary, to replace pipeline system parts and appurtenances and/or pipeline or conduit sections, and repair access roads, including some capital projects.

Several or a sequence of common actions, which are summarized in Table 1, are needed to perform these two types of activities. Actions include, but are not limited to, general set-up, draining of a pipeline segment to perform work or inspections, and replacing or repairing facilities or pipeline components within the drained segment. The activities list is not meant to be comprehensive but is meant to encompass most activities performed on the conveyance system. Activities not specifically described may also be covered by the PMP SEIR if the impacts of those activities are similar to the impacts those actions described and evaluated in the SEIR. Table 1 provides a list of the general categories of activities that would be required to perform the inspection and maintenance of the facilities; more specific descriptions of these activities would be provided in the SEIR.

In compliance with Fish and Game Code section 1602, Valley Water plans to obtain a single Routine Maintenance Agreement (RMA), issued by the California Department of Fish and Wildlife (CDFW), to cover all PMP activities that have the potential to impact CDFW-jurisdictional aquatic features (e.g., streams, stream banks, lakes, riparian habitat). Because the RMA would provide programmatic coverage for PMP activities, it would negate the need for Valley Water to obtain individual Lake and Streambed Alteration Agreements for each PMP activity, thereby resulting in greater cost, staff resource, and schedule efficiencies under the PMP. The RMA would be effective for a minimum of 5 years and renewed on a regular basis in coordination with the CDFW.

Table 1 PMP Activities and Actions Matrix

	General Actions			Pipeline Draining Actions			Pipeline System Infrastructure Maintenance and Repair Actions		
	Setup, staging, and access	Control of hazardous energy (Lock-out/tag-out)	Pump-out of vaults/manholes	Isolation	Dewatering	Refilling	Excavation, backfill, construction, and other ground disturbance	Repair of pipeline system infrastructure	Non-ground-disturbing repair
Inspection Activity									
External inspections	x	x	x	x	x		x		
Internal inspections	x	x	x	x	x				
Facility Maintenance Activity									
Buried and exposed pipeline component maintenance, including pipeline sections, valves, and fittings	x	x	x	x	x	x	x	x	
Tunnel maintenance	x		x	x	x	x	x	x	
Manhole, meter, vault, and related appurtenance maintenance	x	x	x	x	x	x	x	x	X
System instrumentation, controls, and monitoring maintenance	x	x	x	x			x		X
Backup generator maintenance	x	x					x	x	X
Pump station and facility maintenance	x	x	x	x	x	x	x	x	X
Storage tanks and facility maintenance	x	x	x	x	x	x	x	x	X
Surge tank maintenance	x	x	x	x	x	x	x	x	X
Access road and support structure maintenance	x	x	x	x	x	x	x		X
Bank stabilization, erosion control, and energy dissipation device maintenance	x				x		x		
Vegetation management	x				x		x		X

1.5 PMP Impacts to be Analyzed in the Draft SEIR

Valley Water will prepare a Draft SEIR, which will assess the PMP's potential to cause significant impacts on the environment. Specifically, the Draft SEIR will analyze the PMP's reasonably foreseeable direct and indirect impacts and cumulative impacts (in combination with other past, present, and planned projects) for the following resource areas:

- Hydrology and Water Quality
- Geology and Soils
- Biological Resources
- Hazards and Hazardous Materials
- Transportation
- Biological Resources
- Cultural Resources
- Tribal Cultural Resources
- Air Quality
- Greenhouse Gas Emissions
- Energy
- Noise
- Aesthetics
- Wildfire
- Land Use and Planning
- Recreation
- Public Services
- Agriculture and Forestry

The Draft SEIR will also identify feasible mitigation measures to reduce or eliminate potentially significant environmental impacts, where appropriate.

1.6 Environmental Review Process and Scoping

1.6.1 Notice of Preparation

This Notice of Preparation (NOP) initiates the CEQA process through which Valley Water will refine the range of issues and project alternatives to be addressed in the Draft SEIR. In compliance with CEQA Guidelines Section 15082, this NOP contains description of the project, location of the project, and probable environmental effects of the project.

1.6.2 Scoping Meeting

The CEQA public scoping process provides the public and regulatory agencies an opportunity to ask questions and submit comments on the scope of the SEIR. A virtual public scoping meeting will be held during the NOP review period on November 2, 2023. The scoping meeting will solicit input from the public and interested agencies regarding the nature and scope of environmental impacts to be addressed in the Draft SEIR.

At the meeting, a brief presentation will be made to provide an overview of the existing PMP, the new PMP and its relationship to the existing PMP, and the general CEQA process. Written comments will be accepted during the 30-day scoping period that will begin on October 17, 2023, and end on Thursday, November 16, 2023. Electronic written comments will be accepted during and after the virtual scoping meeting. Details on submitting other forms of comment are included at the end of this document.

The public scoping meeting is scheduled for:

November 2, 2023, at 2:30 p.m.

Join the webinar here: <https://us02web.zoom.us/j/85198951440>

Or dial by phone: 1-253-205-0468, Meeting ID: 851 9895 1440

This scoping meeting information is also available on Valley Water's website:

<https://www.valleywater.org/public-review-documents>

1.6.3 SEIR Process

Draft SEIR

After the 30-day review period for the NOP is complete, a draft SEIR will be prepared in accordance with CEQA (Pub. Res. Code Section 21000 et seq.) and the CEQA Guidelines (CCR Section 15000 et seq.). The Draft SEIR will analyze and disclose the reasonably foreseeable direct and indirect environmental impacts that may occur because of the PMP. The Draft SEIR, as informed by public and agency input through the scoping period, will analyze and disclose the potentially significant environmental impacts associated with the PMP and will identify potentially feasible mitigation measures and alternatives where such impacts are considered significant. Alternatives and mitigation measures will be developed with the goal to substantially reduce or avoid any significant impacts that are identified.

The completed Draft SEIR will be made available for a 45-day public review and comment period. Notice of the availability of the draft SEIR will be sent directly to interested parties, responsible and trustee agencies, and those agencies that commented on the NOP. The draft SEIR will be posted on Valley Water's website and on the State Clearinghouse website.

1.7 Submittal of Scoping Comments

The NOP will be circulated to local, state, and federal agencies, and to interested organizations and individuals who may wish to review and comment on the proposed PMP at this stage in the process. Comments concerning the scope and content of this SEIR are encouraged.

Consistent with the time prescribed by State law for public review of a NOP, your response and input regarding the project should be sent at the earliest possible date, but not later than 30 days from the date the NOP is received by agencies and the Governor's Office of Planning and Research, which is also the date published on CEQAnet (October 17, 2023). Please include your name, address, and contact number for your agency as applicable for all future correspondence related to the PMP. Written comments may be sent via email or letter to:

Santa Clara Valley Water District
Attn: Michael Coleman, AICP
Environmental Planner
PMP SEIR Scoping Comments

5750 Almaden Expressway
San Jose, CA 95118-3686
Email: mcoleman@valleywater.org
Subject Line: PMP SEIR Scoping Comments
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