

RECLAMATION

Managing Water in the West

Draft FINDING OF NO SIGNIFICANT IMPACT

Santa Clara Valley Water District's 2017 Pacheco Conduit Maintenance Project

FONSI-15-059



U.S. Department of the Interior
Bureau of Reclamation
South-Central California Area Office

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Mission Statements

The mission of the Department of the Interior is to protect and manage the Nation's natural resources and cultural heritage; provide scientific and other information about those resources; and honor its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

BUREAU OF RECLAMATION
South-Central California Area Office, Fresno, California

FONSI-15-059

**Santa Clara Valley Water District's 2017
Pacheco Conduit Maintenance Project**

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Introduction

In accordance with section 102(2)(c) of the National Environmental Policy Act of 1969, as amended, the South-Central California Area Office of the Bureau of Reclamation (Reclamation), has determined that an environmental impact statement is not required for routine maintenance, rehabilitation, and factual condition assessment of the Pacheco Conduit, Santa Clara Conduit, and Santa Clara Tunnel and their appurtenances. This draft Finding of No Significant Impact (FONSI) is supported by Reclamation's Environmental Assessment (EA)-15-059, *Santa Clara Valley Water District's 2017 Pacheco Conduit Maintenance Project*, and is hereby incorporated by reference.

No final decision shall be made on the FONSI until public review has been completed and comments, if any, considered.

Background

The Pacheco Conduit, Santa Clara Conduit, and Santa Clara Tunnel are part of the of the Bureau of Reclamation's (Reclamation) San Felipe Division of the Central Valley Project (CVP) which supplies raw water to both the Santa Clara Valley Water District (Santa Clara or District) and San Benito County Water District. Santa Clara, pursuant to Operating Agreement (Contract No. 7-07-20-W0130A), operates and maintains the Pacheco Conduit, Santa Clara Conduit, and Santa Clara Tunnel on Reclamation's behalf.

The San Felipe Reach 1 transmission system which includes the Pacheco Tunnel Reach 2, a 114-inch reinforced concrete-lined tunnel, and the Pacheco Conduit, a 120-inch pre-stressed concrete cylinder pipe, are located downstream of the Pacheco Pumping Plant (Figure 1 and Appendix A). In Tunnel Reach 2, water flows approximately 5.2 miles to the Pacheco Sectionalizing Valve. Water then flows approximately 7.9 miles in the Pacheco Conduit to the Bifurcation Structure. At the bifurcation structure, water travelling through the Pacheco Conduit is split, with a portion of the water travelling to San Benito County, through the Hollister Conduit, and the remaining water traveling to Santa Clara County through the San Felipe Reach 2 transmission system.

The San Felipe Reach 2 transmission system, downstream of the Bifurcation Structure, includes the Santa Clara Conduit a 96-inch pre-stressed concrete cylinder pipe and the Santa Clara Tunnel a 102-inch reinforced concrete-lined tunnel. Water travels for one mile through the Santa Clara Conduit to the Santa Clara Tunnel where it travels for one mile before re-entering the Santa Clara Conduit. The water then travels approximately 21-miles in the Santa Clara Conduit to the Coyote Pumping Plant in Morgan Hill, California.

Routine maintenance, rehabilitation, and factual condition assessment of the facilities are necessary to ensure that the Pacheco Conduit, Santa Clara Conduit, and Santa Clara Tunnel and their appurtenances continue to transport water between the San Luis Reservoir and Santa Clara

and San Benito Counties. The District has requested authorization from Reclamation to inspect, maintain, or rehabilitate the Pacheco Conduit, Santa Clara Conduit, and Santa Clara Tunnel. Reclamation prepared a Categorical Exclusion Checklist (CEC) 2013 Draining and Inspection of the Pacheco and Santa Clara Tunnels, CEC-13-024, which analyzed the draining of large areas of the San Felipe water delivery system. CEC-13-024 is incorporated by reference.

The Proposed Action sites are located within Santa Clara County and the plan area (Santa Clara Valley Habitat Plan (VHP)). The VHP is a joint habitat conservation plan and natural communities conservation plan developed to serve as the basis for issuance of incidental take permits and authorizations pursuant to Section 10 of the federal Endangered Species Act and California Natural Community Conservation Planning Act. The proposed project (Santa Clara County portion) is a covered activity identified in the VHP. All activities associated with the proposed project must be implemented consistent with requirements outlined in the VHP. The impacts of general construction activities within the VHP plan area were previously evaluated at a programmatic level in the VHP Final Environmental Impact Report/Environmental Impact Statement, August 2012.

Proposed Action

Reclamation proposes to authorize the District's inspection, maintenance, or rehabilitation the Pacheco Conduit, Santa Clara Conduit, and Santa Clara Tunnel as described herein.

District engineering and maintenance staff would access the entirety of San Felipe Division Reach 1 facilities, the first two miles of the San Felipe Division Reach 2 facilities, and all appurtenances on the Pacheco Conduit, the section of the Santa Clara Conduit between the Bifurcation Structure and the Santa Clara Tunnel, and the Santa Clara Tunnel.

In general the Proposed Action includes the following:

- Pipeline and tunnel dewatering.
- Pipeline and tunnel inspections.
- Appurtenance rehabilitation, as needed.
- Internal pipeline maintenance and repair activities, as needed.
- Structural lining and repair of internal surface lining, as needed.
- The installation of new equipment and improvements.

See Section 2.2 of EA-15-059 for a detailed description of the Proposed Action.

Environmental Commitments

The District shall implement the environmental protection measures listed in Appendices C, D, and E of EA-15-059 to reduce environmental consequences associated with the Proposed Action. Environmental consequences for resource areas assume the measures specified would be fully implemented.

Findings

Reclamation's finding that implementation of the Proposed Action will result in no significant impact to the quality of the human environment is supported by the following findings:

Resources Eliminated from Detailed Analysis

As described in Table 2 of EA-15-059, Reclamation analyzed the affected environment and determined that the Proposed Action does not have the potential to cause direct, indirect, or cumulative adverse effects to the following resources: cultural resources, environmental justice, Indian Sacred Sites, Indian Trust Assets, land use, recreation, or socioeconomic resources.

Air Quality

As shown in Table 3 of EA-15-059, the estimated criteria pollutant emissions from the Proposed Action are well below both the Bay Area Air Quality Management District and the Monterey Bay Unified Air Pollution Control District's thresholds of significance. Consequently, the Proposed Action would not result in significant impacts upon air quality and a conformity analysis pursuant to the Clean Air Act is not required.

Biological Resources

The Proposed Action would result in the removal of 0.1 acres of woody chaparral vegetation at PC #15 and PC #16 (including the blowoff riser at PC #16) to ensure safe access during maintenance activities. The removal of woody chaparral vegetation is being treated as a permanent impact of 0.1 acre of Northern Mixed Chaparral/Chamise Chaparral land cover for compliance with the VHP; this would impact unlisted migratory birds. There would be a temporary loss of 9.69 acres of kit fox foraging and denning habitat. This impact would be minimized and compensated by the District's compliance with the VHP (included as Environmental Commitments in the Proposed Action). No lethal take of Least Bell's Vireos would occur, as the VHP requires pre-activity surveys and a buffer around riparian habitat that may be used by the vireos for nesting. If present, the vireos could still be subject to minor disturbance from noise and the presence of personnel involved in the proposed repairs. As specified by the measures required in the VHP, some water would need to be drained at a discharge rate of 2-4 cfs, into the creeks named above in the Affected Environment section. Impacts to the steelhead and its critical habitat would be minimized by the measures specified in NMFS (2008) (and included in the Proposed Action), in which NMFS concluded that the proposed draining may affect, but was not likely to adversely affect both the species and its critical habitat. These measures would avoid or minimize impacts to the steelhead that might otherwise result from scouring, sedimentation, etc. that could damage eggs, damage the gills of fish, and possibly result in false attraction flows that could attract fish into an area to spawn, only to leave them stranded when the water recedes.

On March 31, 2017, Reclamation sent the District's form used to comply with the VHP, along with a request that the Service confirm that Reclamation's responsibilities under section 7 of the ESA are met by the District's compliance with the VHP. The VHP measures ensure compliance with the Migratory Bird Treaty Act, by requiring that take be avoided. Reclamation consulted with NMFS (NMFS 2008) on the proposed draining, and as explained above, NMFS concluded that the proposed draining may affect, but is unlikely to adversely affect the South-Central California steelhead and its critical habitat.

Global Climate Change

As shown in Table 3 of EA-15-059, annual construction and operational emissions of Carbon Dioxide equivalents (CO₂e) are estimated to be 450.8 and 108.5 metric tons (2017 and 2018 respectively), well less than the EPA's 25,000 metric tons per year threshold for annually reporting greenhouse gases emissions. Accordingly, the Proposed Action would result in below *de minimis* impacts to global climate change.

Water Resources

The Pacheco Conduit, Santa Clara Conduit, and Santa Clara Tunnel would be out of service temporarily, during the dewatering and construction periods of the Proposed Action. Both water districts have alternative sources of water. In order to reduce the temporary disruption and inconvenience to water users, work requiring pipeline(s) shutdown would be scheduled for when demand is lower. As described in Section 2.2, BMPs found in Appendix B, which may include coir logs, straw wattles, and visqueen would be used in the construction area to control erosion; to prevent any potential impacts to local waterways; and to minimize ground saturation in the appurtenance work areas. In addition, the District will acquire all permits required for working in waterways and implement all necessary BMPs to avoid and/or minimize potential water quality impacts. Completion of the Proposed Action would ultimately provide both water district's customers with a more reliable source of water.

Cumulative Impacts

Cumulative impacts result from incremental impacts of the Proposed Action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment.

Air Quality

The estimated annual operational emissions are shown below. The California Emissions Estimator (CalEEMod), Version 2013.2.2, was used to estimate construction and operational (vehicle trips) emissions. The modeling results are provided in Table 3 and the CalEEMod output files are provided in Appendix E of EA-15-059,

Construction-related emissions are considered temporary, and do not exceed the Air District's thresholds of concern, so cumulative adverse effects would not occur. Since long-term operational emissions would be unchanged as a result of the Proposed Action, they also would not contribute to cumulative air quality impacts.

Biological Resources

Agricultural and urban development has historically resulted in loss and modification of habitat for Federally listed species in the Proposed Action Area. Current impacts that are expected to continue in the future include agricultural activities, such as mowing of an adjacent hay field and possible use of pesticides. Compliance with the VHP includes a requirement that the District compensate for habitat loss that would result from the Proposed Action. This, in conjunction with the minimization measures required, would reduce any cumulative contribution to biological resource impacts in the Proposed Action Area.

Global Climate Change

Greenhouse gases emissions generated by the Proposed Action are expected to be extremely small, as seen in Table 3 of EA-15-059. While any increase in greenhouse gases emissions would add to the global inventory of gases that would contribute to global climate change, the Proposed Action would result in potentially minimal to no increases in greenhouse gases emissions and a net increase in greenhouse gases emissions among the pool of greenhouse gases would not be detectable.

Water Resources

Temporary disruption in water service to the District and San Benito Water District's customers would occur during the Proposed Action; however, there would be cumulatively beneficial impacts over the long-term as water supply would be more reliable. Additionally, the completion of this Proposed Action, when combined with future O&M activities, would reduce the need to discharge large amounts of water prior to future maintenance activities.