4.0 Required CEQA Considerations

4.1 Cumulative Impacts

CEQA requires that an EIR examine cumulative impacts of a proposed project. As discussed in the CEQA Guidelines Section 15130(a)(1), a cumulative impact "consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." The analysis of cumulative impacts need not provide the level of detail required of the analysis of impacts from the project itself, but shall "reflect the severity of the impacts and their likelihood of occurrence" (CEQA Guidelines Section 15130[b]).

Cumulative impacts were evaluated in the Town of Windsor Water Reclamation Master Plan EIR (ESA, 2001). For Alternative 4X in the Master Plan EIR, cumulative impacts were determined to be as follows.

1. Concurrent construction of other projects would result in cumulative impacts, but the impacts would be less-than-significant with the implementation of project-specific mitigation measures. "Concurrent construction" includes major infrastructure projects in the general vicinity of Master Plan facilities, such as the Geysers pipeline through the Town, the Sonoma County Water Agency's storage pond along Mark West Station Road (Ocean View Reservoir), drainage improvements within the Town limits, and a bridge replacement project on nearby Wohler Road. At this time, most of these construction projects have been completed, and many are not located in the vicinity of the facilities being considered in this SEIR.

2. Implementation of the Master Plan EIR, together with other infrastructure projects and general development within the Windsor area, would result in significant cumulative effects to oak woodland habitat. Master Plan facilities – including the Project (as Pond T) – would substantially contribute to this significant cumulative effect. Although mitigation measures are prescribed in the Master Plan EIR, the impact would remain significant after mitigation (i.e., a significant and unavoidable impact).

3. One of the Master Plan facilities (Pond S) would result in less-than-significant cumulative impacts to geologic hazards and water quality when considered together with other recycled water projects, especially the adjacent Sonoma County Water Agency storage pond on Mark West Station Road (Ocean View Reservoir).

4. Discharge from Master Plan facilities into Mark West Creek, together with other point-source and non-point source discharges in the watershed, would result in cumulative water quality impacts. These impacts would not be significant when considered in the context of existing regulatory mechanisms such as the National Pollution Discharge Elimination System and Total Maximum Daily Load programs implemented by the Regional Water Quality Control Board.

5. Irrigation use from Master Plan facilities, together with irrigation from other recycled water projects, could result in cumulative effects to groundwater quality from increased salt loading. This impact would be less-than-significant because of the lower salt levels in recycled water (compared to existing groundwater salt concentrations), regional hydrogeologic conditions, and provisions to be implemented with each individual recycled water use agreement.
6. Irrigation use from Master Plan facilities, together with irrigation from other recycled water projects and local irrigation activities, could result in cumulative effects to biological resources. Cumulative impacts would be less-than-significant with the implementation of Project-specific mitigation measures.

The analysis of cumulative impacts in the Master Plan EIR remains adequate for the Eastside Road Storage Project, but some information is out-of-date. Specifically, most of the concurrent construction projects have been completed, and others are no longer relevant to the analysis because they are not located near the proposed Eastside Road Storage Project facilities. The analysis of impacts from concurrent construction projects (summarized in item no. 1 above) requires a new project list – projects in the vicinity of the proposed storage pond, pump station, and pipeline that are expected to be under construction during the Eastside Road Storage Project construction period.

At this time, no other projects are expected to be under construction at the same time as the proposed Project. No public infrastructure projects have been programmed for the area. It is possible that various discretionary and non-discretionary actions may occur on adjacent private lands (e.g., grading for agricultural purposes, construction of homes and other structures), but the Town of Windsor is not aware that any specific private construction projects are planned. To the extent that any such construction occurs concurrent with the development of the Eastside Road Storage Project, cumulative impacts would be similar to those described in Impact 5.1 of the Master Plan EIR (summarized in item no. 1 above).

The Project is consistent with the range of alternatives considered in the Master Plan EIR, and therefore the analysis of operations-phase cumulative effects remains adequate. These are described in items no. 2, 4, 5, and 6 above regarding cumulative impacts to mixed oak woodland habitat and surface water discharges, and groundwater quality and biological resources impacts from irrigation. The impacts described in item 3 are not relevant to this SEIR because Pond S is not part of the proposed Project.

Continuing implementation of the Master Plan could include other project elements considered in the Master Plan EIR such as discharge to the Geysers Pipeline, increased surface storage (e.g., construction of Pond S), and increased use of recycled water for irrigation. To the extent these are reasonably foreseeable future projects, their impacts combined with the impacts of the Project are described in the Master Plan EIR (and summarized above). Any substantial changes to the future projects would be evaluated in future environmental assessments, if necessary.

4.2 Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines states that an EIR should discuss "the ways in which the proposed project could foster economic or population growth, or the construction

of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth." To assess growth-inducing potential, the project's characteristics that encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated.

It was determined in the Master Plan Draft EIR (ESA, 2000) and Final EIR (ESA, 2001) that implementation of the Master Plan (Brelje & Race, 2001), including the proposed Project, would not be growth inducing and would not alter the location, distribution, or level of planned growth within the Town of Windsor. However, the Master Plan Draft EIR and Final EIR determined that the growth accommodated by the Master Plan, including the proposed Project, could result in secondary environmental effects. Significant, unavoidable secondary impacts identified by the General Plan EIR (Ogden, 1996b) include impacts to air quality, noise, visual resources, and potential conflicts with visual separator policies. All other impacts associated with the General Plan would be reduced to a less than significant level through policies and programs identified in the General Plan, or other regional programs within the jurisdiction of other agencies. The adopted *Town of Windsor General Plan - 2015* policies and mitigation measures (Ogden, 1996a) are applicable to the Master Plan, including the proposed Project. No additional growth inducing-impacts are anticipated from the proposed Project, beyond what has previously been identified in the Master Plan Draft EIR or Final EIR; no additional mitigation measures are required.

4.3 Significant and Unavoidable Adverse Impacts

According to CEQA Guidelines §15126, an EIR must disclose the significant unavoidable impacts that would result from a project. Moreover, these guidelines state that an EIR should explain the implications of such impacts and the reasons why the project is being proposed, notwithstanding such impacts. Implementation of the proposed Project would result in the alteration of the physical environment. Section 3 of this Draft SEIR (Setting, Impact Analysis, and Mitigation Measures), and Section 4.1 (Cumulative Impacts), provide a description of the potential environmental impacts of the Project, as well as measures to reduce the environmental impacts to less than significant.

With implementation of the mitigation measures described in Section 3, the only Project-related impacts that can not be feasibly mitigated to a less than significant level are the loss of mixed oak woodland habitat and the loss of protected trees. As discussed in Section 3.2, Biological Resources and Section 4.1, Cumulative Impacts, impacts to mixed oak woodland habitat would be significant despite the lessening of these impacts through substantial mitigation. In addition to the measures used to decrease Project-specific impacts (see Mitigation Measures 3.2-1a through 3.2-1d), great effort was taken on the part of the Town to design the Project to minimize potential for mixed oak woodland impacts.

As discussed in Section 2.1 (Project Background and Origin), in accordance with the Town Council's direction, other Master Plan program elements were pursued before the Project in order to defer significant and unavoidable impacts associated with this Project. However, delays in implementing other recycled water programs and unforeseen problems meeting the Town's anticipated demand for water use have resulted in the Town needing to implement the proposed Project.

4.4 Significant Irreversible Changes

Materials used for the Project are primarily non-renewable (concrete, plastics, and fuels required to power construction equipment). Once operational, the Project need for energy is minor and limited to the occasional/seasonal use of the pump station. Mitigation for the loss of mixed oak woodland habitat, a slowly-renewable resource, is identified in Section 3.2, Biological Resources. As described in Sections 3.2 and 4.1, the loss of mixed oak woodland is a significant and unavoidable impact.

4.5 References

Brelje & Race. 2001. *Town of Windsor Water Reclamation Master Plan for Treatment, Storage and Disposal*. Adopted by the Town of Windsor. December.

Environmental Science Associates (ESA). 2001. *Town of Windsor Water Reclamation Master Plan for Treatment, Storage and Disposal Final EIR*, SCH No. 99112034. Certified by the Town of Windsor on February 7, 2001 and compiled in May 2001.

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Harland Bartholomew & Associates. 1996. *Santa Rosa Subregional Long-Term Wastewater Project Draft EIR/EIS.* Prepared for the City of Santa Rosa and U.S. Army Corps of Engineers, San Francisco District. July.

Ogden Environmental & Energy Services Co. (Ogden). 1996a. *Town of Windsor General Plan – 2015.* Adopted by Town of Windsor Planning and Building Department. March.

_____. 1996b. *Town of Windsor General Plan – 2015 Final Environmental Impact Report.* Certified by the Town of Windsor. January.

Santa Rosa Plain Conservation Strategy Team. 2005. *Final Santa Rosa Plain Conservation Strategy.* December.