

# RECLAMATION

*Managing Water in the West*

## Draft FINDING OF NO SIGNIFICANT IMPACT

# Clayton Regency Mobile Home Park Out of Area Service Agreement

FONSI-10-097

Recommended by:

\_\_\_\_\_ Date: \_\_\_\_\_  
Ben Lawrence  
Natural Resources Specialist  
South-Central California Area Office

Concurred by:

\_\_\_\_\_ Date: \_\_\_\_\_  
Chuck Siek  
Supervisory Natural Resources Specialist  
South-Central California Area Office

Concurred by:

\_\_\_\_\_ Date: \_\_\_\_\_  
Randy English  
Chief, Resources Management Division  
South-Central California Area Office

Approved by:

\_\_\_\_\_ Date: \_\_\_\_\_  
Michael P. Jackson  
Area Manager  
South-Central California Area Office





# Introduction

## Background

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 to permit Contra Costa Water District (CCWD) to deliver Central Valley Project (CVP) water to the Clayton Regency Mobile Home Park (Park) outside of their service area. This Finding of No Significant Impact (FONSI) is supported by Reclamation's Final Environmental Assessment (EA) number EA-10-097, *Clayton Regency Mobile Home Park Out of Area Service Agreement*, which is hereby incorporated by reference.

The Park is located in unincorporated Contra Costa County, outside the boundaries of any water district. Over the years a variety of sources have been used to supply drinking water to the Park. The current arrangement, established in 2001, is for potable water to be delivered by truck to onsite water tanks. In 2007, the County Public Health Director issued a letter to the Park informing them that these deliveries represent an unacceptable risk of an outbreak of waterborne disease. The Health Director concluded that permanent water service by pipeline from CCWD was the only available option to address the public health hazard.

Reclamation has a long-term contract with CCWD (Contract No. 175r-3401A-LTR1), to deliver CVP water for municipal and industrial use. However, the area where the Park is located is not part of CCWD's traditional service area, and written approval has not yet been given to supply CVP water to this area. Contra Costa County completed its California Environmental Quality Act (CEQA) review on September 21, 2011 and on December 14, 2011 CCWD received approval from the Contra Costa County Local Area Formation Commission to extend service outside its jurisdictional boundary for the sole purpose of providing water service to the Park. A condition of this approval is that no other new customers would be served by the water line.

In early 2012, CCWD constructed a temporary filling station at 12000 Marsh Creek Road, next to the Marsh Creek Detention facility. This allows trucks transporting water to the Park to fill from a CCWD source rather than the city of Brentwood, which is farther away. The water comes from non-CVP sources; therefore Reclamation approval was not required for the installation. This interim arrangement was established for a period of 18 months.

## Proposed Action

### Water Line

Reclamation proposes to permit the delivery of CVP water by CCWD to customers outside of their service area. In order to deliver this water, CCWD and the Park will install and operate a water line from the current service terminus to the mobile home park, a distance of approximately 15,000 feet. The primary location of the pipeline will be within the traffic lane on the downhill slope of the road. A station for periodic flushing of the pipeline will also be constructed within the park, downstream of the service meter.

### **Staging Area**

A temporary staging area will be located on County property, adjacent to the Marsh Creek Detention Facility and the temporary filling station.

### **Chlorine Booster Station**

Due to the length of the pipeline, it is anticipated that disinfectant concentrations will drop to unacceptably low levels by the time water reaches the Park unless additional treatment is implemented. A booster station is therefore proposed at CCWD's Nob Hill Pump Station site.

### **Storm Water Outfall Reconstruction**

The existing outlet pipe to Marsh Creek is corroded at several points along the bottom, and the surrounding slope has been eroded and undermined. In order to stabilize the outfall and limit adverse impacts to the Creek, the existing outlet pipe will be replaced with a new structure and the slope will be stabilized.

### **Project Operation & Maintenance**

To ensure water quality, the new pipeline will be flushed periodically. This will result in an outflow of about 100 gallons per minute (gpm) up to a total of 20,000 gallons per occurrence of potable (dechlorinated) water into Marsh Creek. These discharges could take as long as 3.5 hours and will occur with irregular frequency, at any time of year. The dechlorinated water will use the existing storm drainage system, running across the parking lot, through a storm outlet and eventually to Marsh Creek.

## **Findings**

### **Water Resources**

The project will require one bridge crossing of Marsh Creek as well as crossings of several minor drainage structures and a petroleum transmission pipeline. Drainage crossings could either be above or below the culverts depending on the grade and available cover at each location. Work in regulated waterways may be necessary, depending on the limits of final design. It will be the responsibility of the project proponent to apply for and secure all necessary permits.

Water flushed from the pipeline during maintenance will be dechlorinated and directed to Marsh Creek by the existing storm water drainage flow path. Although the volume of water directed to the Creek will increase during these events, it will come from a clean drinking water source. There will be no introduction of new pollutants to the waterway.

Construction activities involving soil disturbance, such as excavation, stockpiling, and grading could result in increased erosion, sedimentation and siltation to surface waters. Erosion and sediment controls will be implemented such that the project will not significantly contribute to violations of water quality, or interfere with measures by others to improve water quality.

### **Land Use**

Drinking water service will be provided to an area which is currently not connected to a water utility. However, the system is being designed only to meet the existing needs of the Park. No

excess capacity will be available to serve other customers along the rest of the length of the pipeline. Therefore no changes to land use patterns are anticipated as a result of the project.

### **Biological Resources**

Under the Proposed Action, pipeline construction could result in impacts to kit foxes, upland refugial habitat for tiger salamanders, and disturbance of raptors and individual tiger salamanders and special-status frogs. Replacement of the outfall structure will stop further impacts due to the erosion associated with the current structure, but will also result in a small amount of habitat loss for special-status frogs, silvery legless lizards, pond turtles, and could disturb raptors during construction. However, measures will be implemented to avoid impacting raptors during the nesting season (i.e. if nests are present nearby, the work will not be conducted when eggs are present or if young have not fledged). The other species are covered by the East Contra Costa County HCP/NCCP, and the County will pay fees to compensate for the impacts, and implement the minimization measures prescribed by the HCP and associated 10(a)(1)(B) permit issued by the U.S. Fish and Wildlife Service pursuant to the Endangered Species Act (ESA). These measures and fee payment will prevent any take of migratory birds and prevent population-level declines of any special-status species.

### **Cultural Resources**

On May 16, 2011, Reclamation issued a Finding of No Historic Properties Affected for the proposed project. The State Historic Preservation Officer was given an opportunity to review the finding and did not object to the Finding. Therefore it is not expected that the project will adversely affect any sites or properties that are on or eligible for the National Register of Historic Places.

### **Indian Sacred Sites**

The Proposed Action will not limit access to or ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites. There will be no impacts to Indian Sacred Sites as a result of the Proposed Action.

### **Environmental Justice**

Installation of the proposed water line will improve water security for the residents of the Park, providing a positive impact. Benefits will be similar among all demographic groups.

### **Socioeconomic Resources**

In the long term, the proposed action will reduce a public health risk, resulting in an overall improvement in socioeconomic conditions for residents of the Park. However temporary disruption and inconvenience are expected in the short term as a result of construction.

### **Air Quality**

Construction of the pipeline will result in emissions of carbon monoxide, reactive organic gases (ROG), oxides of nitrogen and particulate matter. These will be temporary and minor relative to the thresholds of concern established by the Bay Area Air Quality Management District. Operation of the pipeline will not produce any air emissions, since it will be gravity-fed.

Elimination of the current deliveries of water by truck will eliminate a small existing source of emissions.

**Global Climate**

Between construction equipment and water deliveries, approximately 250 tons of greenhouse gases are anticipated to be emitted, which is well below thresholds of concern established by the Air Quality Management District. No GHG emissions will be generated during operation of the pipeline, since it will be gravity-fed. Elimination of regular water deliveries will result in a minor net reduction of annual emissions.