

TECHNICAL MEMORANDUM



# IRWP Seasonal Storage Project Regulations and Approvals for Storage Alternatives

TO: City of Santa Rosa

FROM: Matt Franck/CH2M HILL  
John Schoonover/CH2M HILL  
Mieke Sheffield/CH2M HILL

REVIEWED BY: Ted Whiton/Winzler & Kelly

COPIES: Dave Smith, Merritt Smith Consulting  
Mark Millan, Data Instincts  
Pat Collins, Winzler & Kelly

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## Background and Purpose

The purpose of this Technical Memorandum (TM) is to summarize the anticipated environmental and other permits and agency approvals expected to be required for each of the seasonal storage sites under consideration for the Santa Rosa Incremental Recycled Water Program Seasonal Storage Project.

## Conclusions and Recommendations

When the Environmental Impact Report (EIR) for the project is complete, the City of Santa Rosa (City) may select one or more of the proposed storage ponds to construct. Storage ponds would potentially be constructed at three sites:

- Site 1 – Kelly Farm
- Site 2 – Brown Farm
- Site 3 – Alpha Farm

The West College and Alexander Valley Road Sites are not considered further because of findings from the geotechnical investigations indicating uncertainty related to potential impacts from liquefaction, fault zones, and/or landslides and the appropriate measures to mitigate for these potential hazards. Based on the geotechnical findings at these sites, both are considered infeasible as defined by CEQA Guidelines, as described in the TM *Geotechnical Evaluation, November 2007*.

In addition, the storage ponds at the Petaluma Hill Road Site have storage capacities of less than 50 MG each and are costly to construct due to site constraints such as high groundwater levels and faults across the site. The present worth costs per million gallon for these ponds are more than four times greater than the ponds at the other five sites. The substantially higher costs make it doubtful that the project could be successfully financed or that it is economically feasible to implement at this time. Therefore, the Petaluma Hill Road sites would not meet the Project's primary Project Objectives and it is not recommended for further study.

Facilities included in the Project include the storage ponds and all ancillary improvements. For this memorandum, the required ancillary improvements generally include onsite pump stations, access roads, connecting pipelines, electrical power lines, and, in some cases, upgrades to the Llano Pump Station.

Table 1 lists the permits and agency approvals anticipated at this time to be required for each of the three seasonal storage sites. Permit requirements would be reviewed subsequent to completion of the technical studies for the Project EIR. For those sites with more than one pond option, the same permits are expected for each individual pond. Descriptions of the various permit agency requirements are provided following the Table 1.

TABLE 1

Potentially Applicable Federal, State, Regional, County, and City Permits and Approvals Summary (an X in the box under an alternative indicates the permit applies to that alternative)  
*IRWP Seasonal Storage Project – Regulations and Approvals for Storage Alternatives*

Agency	Type of Permit or Approval	Regulated Activity	Site			Review Period	Authority	Fees (per Site)
			1	2	3			
<b>Federal Agency Permits and Approvals</b>								
USACE	Section 404 (Individual or NWP)	Discharge of dredged or fill material into waters of the U.S., including wetlands.	X	X	X	Six to 8 months after application submittal. Application based on 10% design. Ten to 12 months if an individual permit is required.	Section 404 CWA (33 USC 1344)	None
USFWS	Section 7 Consultation or Santa Rosa Plain Conservation Strategy Mitigation	Consideration of a Section 404 permit by the USACE.	X	X	X	Four to 6 months after submittal of permit application and Biological Assessment.	16 USC 1531 et seq; 50 CFR Part 17, Sections 17.94-17.96 ESA	None
NOAA	Section 7 Consultation	Consideration of a Section 404 permit by the USACE.			X	Four to 6 months after submittal of permit application and Biological Assessment.	16 USC 1531 et seq; 50 CFR Part 17, Sections 17.94-17.96 ESA	None
State Office of Historic Preservation	Section 106 Review and Compliance	Consideration of a Section 404 permit by the USACE.	X	X	X	Up to 6 months after submittal of permit application and research findings on cultural and historic resources.	NHPA 36 CFR 800	CHRIS fees starting at \$360 for two hours on up
<b>State Agency Permits and Approvals</b>								
Caltrans	Encroachment Permit	Use of California rights-of-way for traffic control measures.	X	X		Two months after certification of EIR.	California Vehicle Code Section 6	\$492 initial deposit, fee would then be re-assessed by Caltrans
Caltrans	Transportation Permit	Transport of heavy or oversized loads on state roads during construction.	X	X	X	Same day as applied for.	California Vehicle Code Section 35780; California Streets and Highway Code 117, 660-711	Up to \$90 annually
SWRCB	General Construction Stormwater NPDES Permit	All stormwater discharges from construction activities disturbing 1 acre or more.	X	X	X	Prior to construction activities.	CWA	See note 1
DSOD	Approval of plans and specifications for the construction or enlargement of a dam or reservoir	Dam or reservoir construction or enlargement.	X	X	X	Six months after application submittal.	California Water Code Division 3, Dams and Reservoirs Parts 1 and 2	See note 2

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Agency	Type of Permit or Approval	Regulated Activity	Site			Review Period	Authority	Fees (per Site)
			1	2	3			
CalOSHA	Permits for construction, trench excavations, and demolition	Construction of trenches or excavations 5 feet or deeper and into which a person is required to descend.	X	X	X	One week after application submittal.	California Labor Code Section 6500	\$50 activity fee; \$100 annual fee
CDFG	Streambed Alteration Agreement	Crossing of streams, rivers, or lakes (also for reservoirs, which interrupt streams).	X	X	X	One month after application submittal based on 50% design.	Sections 1601-1603 of the California Fish and Game Code	\$6,400
CDFG	Section 2081 Management Agreement	Potential adverse effects to state endangered or threatened species or species proposed for state listing. Incidental “take” of state-protected species by a non-state entity.	X	X	X	Seven months after application submittal based on 50% design.	Sections 2081(b) and (c) of the California Endangered Species Act	None
NCRWQCB	Section 401 Water Quality Certification	Discharge of fill materials to waters of the U.S.	X	X	X	Six months after application submittal based on 10% design.	CWA	\$500 base fee
NCRWQCB	Waste Discharge Requirements	Discharge of reclaimed water to surface water on land and to groundwater.	X	X	X	Six months to 1 year after application submittal based on 10% design.	Porter-Cologne Water Quality Control Act	Unknown
<b>City and County Permits and Approvals</b>								
Sonoma County PRMD	3836 Permit	Construction in flowing waters	X	X	X	Six weeks; must be approved by Board of Supervisors	County Codes	\$159
Sonoma County PRMD	Road Encroachment Permit	New transmission, water, or gas line crossings, or construction on or across county roads.	X	X	X	One to 2 months.	County Codes	See note 3
Sonoma County PRMD	Grading Permit	Certain grading activities if conducted prior to obtaining a building permit.	X	X	X	Two months.	County Codes	See note 4
Sonoma County PRMD	Transportation Permit	Transport of heavy or oversized loads on county roads.	X	X	X	One day.	County Codes	Up to \$90

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Agency	Type of Permit or Approval	Regulated Activity	Site			Review Period	Authority	Fees (per Site)
			1	2	3			
Sonoma County PRMD	Well Construction or Destruction Permit; Geotechnical Boring Permit	Drilling of borings and/or wells; destruction of wells.	X	X	X	One to 2 weeks.	County Codes	\$299 up to 6 monitoring wells/parcel; \$238 up to 6 geotechnical borings/parcel; \$216 well destruction
Sonoma County Department of Emergency Services	Hazardous Materials Business Plan	Storage of 55 gallons or greater of hazardous liquids (i.e., diesel) or 200 scf of gases (i.e., propane)	X	X	X	Plan to be submitted within 30 days of start of operations.	California Health and Safety Code; California Code of Regulations	\$487 if less than 550 gallons liquid or 2,000 scf of gases

Notes:

1. Site 1: \$2,607; Site 2: \$2,607 annually; Site 3: \$2,067 annually.
2. Fees are required at the application stage based on cost estimates (subject to adjustment based on actual costs). Fees are calculated on a sliding scale up to \$7 million, ranging from 3 percent of cost to 0.75 percent of cost. Fees are 0.5 percent for estimated costs over \$7 million. In addition to the application fee, a yearly fee would be required for the life of the project. The annual fee is currently \$420 per dam plus \$116 per foot of height, and is subject to periodic adjustment.
3. Fees would be charged on an actual cost basis. A minimum fee of \$93 would be required at the time the application. After staff review of the application, a preliminary estimate of costs would be provided.
4. 100,001 cubic yards or more - \$1,467.14 for the first 100,000 cubic yards, plus \$57.50 for each additional 10,000 cubic yards, or fraction thereof, plus an additional 10% of fee for Storm Water Pollution Prevention (NPDES).

CalOSHA	=	California Occupational Safety and Health Administration	ESA	=	Endangered Species Act
Caltrans	=	California Department of Transportation	NCRWQCB	=	North Coast Regional Water Quality Control Board
CCR	=	California Code of Regulations	NHPA	=	National Historic Preservation Act
CDFG	=	California Department of Fish and Game	NOAA	=	National Oceanic & Atmospheric Administration
CFR	=	Code of Federal Regulations	NPDES	=	National Pollutant Discharge Elimination System
USACE	=	U.S. Army Corps of Engineers	PRMD	=	Permit and Resource Management Department
CHRIS	=	California Historical Resources Information System	RWQCB	=	Regional Water Quality Control Board
CWA	=	Clean Water Act	Scf	=	standard cubic feet
DSOD	=	Division of Safety of Dams	SWRCB	=	State Water Resource Control Board
DWR	=	California Department of Water Resources	USFWS	=	U.S. Fish and Wildlife Service

## U.S. Army Corps of Engineers

Section 404 of the federal Clean Water Act requires that no discharge of dredged or fill material can be permitted if a practicable alternative exists that is less damaging to the aquatic environment or if the nation's waters would be significantly degraded. Section 404(a) authorizes the U.S. Army Corps of Engineers (USACE) to issue permits regulating the discharge of dredged or fill material into waters of the United States, including wetlands. When applying for a permit, the applicant must demonstrate compliance with the U.S. Environmental Protection Agency (EPA) Section 404(b)(1) guidelines. These include avoiding wetland impacts where practicable, minimizing potential impacts to wetlands, and providing compensation for any remaining unavoidable impacts through activities to restore or create wetlands.

Two basic types of Section 404 permits are issued by the USACE, general and individual. For most discharges that would have only minimal adverse effects, the USACE has approved general permits that apply to specific categories of projects. These may be issued on a nationwide, regional, or statewide basis for particular categories of activities (i.e., minor road crossings, utility line backfill and bedding) to expedite the permitting process. The Kelly, Brown, and Alpha Sites are located within the Santa Rosa Plain Programmatic Biological Opinion area, where individual permits are required for fill greater than 0.1 acre. Processing of an individual permit can require a public hearing process and preparation of an Environmental Assessment (EA). The USACE would generally not issue a permit until the Water Quality Certification is granted from the appropriate water quality agency. As part of the Section 404 process, the USACE would consult with US Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA Fisheries or NMFS) as well as the State Historic Preservation Officer (SHPO). The specific roles of these agencies are discussed in further detail below.

To support this permitting process, a wetland delineation would be prepared and submitted by the City to the USACE for verification and approval. This permit process occurs simultaneously with, and continues after, the Project EIR process. It is estimated to take 6 to 8 months after application submittal based on a 10 percent design. If an EA is required, it can run concurrently with the individual permit process. After review and approval, the USACE would provide a written response that the Project can proceed under the terms and conditions of the permit or can proceed with mitigation or special conditions.

At this time, wetland delineations have not been performed and the extent of Waters of the U.S., including wetlands, has not been determined. Waters released at the ponds' emergency spillways would encroach into Waters of the U.S. – either seasonal swales at the Kelly Farm and Brown Farm sites, or named creeks at the Alpha Farm sites. The emergency spillways would require authorization by the USACE as described above. This authorization is expected to be in the form of the nationwide permit process because of the expected small extent of encroachment. The Kelly Farm improvements would include some additional encroachments by access roads, but this would not appear to warrant the more rigorous individual permit process.

## U.S. Fish and Wildlife Service and NOAA Fisheries

The federal Endangered Species Act (ESA) of 1973 is a mechanism for the protection and recovery of species threatened with extinction. The ESA is administered by NOAA Fisheries and the USFWS. NOAA Fisheries (also known as NMFS) is generally responsible for marine species and anadromous fish, and USFWS is generally responsible for terrestrial species and freshwater fish species.

Section 7 of the ESA requires federal agencies to use their authority to conserve endangered species. It further directs federal agencies to consult with USFWS and/or NOAA Fisheries if any action they authorize, fund, or carry out “may affect” any species listed or proposed to be listed, or any critical habitat designated or proposed to be designated under the ESA. If the issuance of a Clean Water Act Section 404 permit by the USACE may affect any listed species, the USACE must consult with USFWS on the effects of the issuance of that permit.

Named creeks in the area may be considered steelhead or coho habitat, and Section 7 consultation would be required with NMFS. This applies to the Alpha Farm (Roseland Creek) site. The unnamed drainages at the Kelly Farm and Brown Farm sites are not expected to require Section 7 consultation with NMFS. NMFS is currently considering a proposal to list one or two anadromous fish species under the federal ESA. If a listing is approved, a Section 7 consultation would occur concurrently with the USACE 404 permit application.

Section 7 requires federal agencies or their designees to prepare a Biological Assessment (BA) prior to consultation. The BA analyzes the effects of the action on listed and proposed species and describes measures that would be taken to minimize Project impacts. The BA should be completed within 90 to 180 days after its initiation (or within a mutually agreeable time period). If the BA is not initiated within 90 days of receipt of the species list, the accuracy of the species list should be formally verified with the USFWS. A Biological Opinion would be issued by USFWS and/or NMFS that may allow incidental “take” of protected species. Consultation is estimated to require about 26 weeks after permit application and BA submittal.

In addition to the typical consultation process described above, several sites are within the area regulated under the Santa Rosa Plain Conservation Strategy. The Conservation Strategy is the result of a 21-month planning effort by a team of local environmental and development interests, and local, state, and federal officials including the USFWS. The purpose of the Conservation Strategy is to implement a long-term conservation program sufficient to mitigate potential adverse effects on listed species due to future development on the Santa Rosa Plain. The program would contribute to the recovery of the Sonoma County distinct population segment of the California tiger salamander (CTS), Burke’s goldfields, Sonoma sunshine, Sebastopol meadowfoam, and the many-flowered navarretia (listed plants), and to the conservation of their sensitive habitat. The Conservation Strategy accomplishes the above in a manner that protects stakeholders’ (both public and private) land use interests, and supports issuance of an authorization for incidental take of CTS and listed plants that may occur in the course of carrying out project activities on the Santa Rosa Plain. The Conservation Strategy maps eight conservation areas that identify areas where mitigation for project-related impacts to the listed species and vernal pools should be directed and

identifies areas important for the protection of CTS and listed plants. A portion of one of the proposed Kelly Farm pond sites falls within a CTS Conservation Area. Designation of an individual property as being within a conservation area does not change that property's land use designation or zoning, or otherwise restrict the use of that property. However, compliance with the ESA and other state and federal laws is still required.

A detailed map of the Conservation Strategy Study Area has been developed and was most recently updated in April 2007. Figure 1 shows the areas of impact within the study area for the proposed Kelly Farm, Brown Farm, and Alpha Farm sites.

## State Historic Preservation Officer

Section 106 of the National Historic Preservation Act (NHPA) of 1966 requires federal agencies to take into account the effects of their undertakings on historic properties, and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. Before granting a permit, the USACE would ask the SHPO to concur with its decision. To satisfy this requirement, an Archeological Reconnaissance Report must be completed for the proposed project sites to locate any archeological or tribal resources that could be affected by implementation of the project. All proposed storage sites have the potential to disturb cultural resources.

If a finding of no effect on historical properties from the proposed action is issued by the USACE, the SHPO has 30 days after receiving the notice to respond and either concur or not. A determination of no adverse effect must be sent to both the SHPO and the Advisory Council. This process could take up to 60 days, 30 days for a response from the SHPO and another 30 days for a response from the Advisory Council. If the SHPO does not respond, concurrence with the determination may be assumed.

If the SHPO does not concur with the findings and the lead agency (USACE) cannot resolve the disagreement, a formal determination of eligibility must be requested from the Keeper of the National Register (in the National Park Service). The Keeper's decision is final.

## California Department of Transportation

The use of California State highways for other than normal transportation purposes may require written authorization from the Department of Transportation (Caltrans). Posting of signage on Caltrans' rights-of-way for traffic control during periods of construction requires an Encroachment Permit. Caltrans District 04 would review the Project EIR and the proposed alternatives for their potential effects to cultural and historical resources upon receipt of a permit application.

As a state agency, Caltrans' review process follows guidelines of CEQA, including Appendix K, Archaeological Resources and Impacts. However, in situations where the project involves federal funds or permits issued by federal agencies, Caltrans would review projects for potential effects on cultural and historical resources in relation to federal regulations (i.e., Section 106 of the NHPA).

Review of Encroachment Permits takes 60 days, and approval cannot be given unless the final environmental document is submitted. As soon as routes are determined, the process can be expedited by meeting directly with Caltrans personnel.

In addition, transport of heavy or oversized loads on state roads during construction would require a Caltrans Transportation Permit. This permit can be obtained on the same day the application is submitted.

## State Water Resources Control Board

The federal Clean Water Act effectively prohibits discharges of stormwater from construction sites unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The State Water Resources Control Board is the permitting authority in California and has adopted a statewide General Permit for Stormwater Discharges Associated with Construction Activity (Water Quality Order No. 99-08-DWQ) that applies to projects resulting in 1 or more acres of soil disturbance. The proposed Project would result in disturbance of more than 1 acre of soil at each proposed site. Therefore, at a minimum 30 days prior to ground disturbance, the State Water Board requires a Notice of Intent to be filed and preparation of a Stormwater Pollution Prevention Plan (SWPPP) that would be maintained onsite. The purpose of the SWPPP is to identify potential pollutant sources that may affect the quality of discharges associated with construction activity, identify non-storm water discharges, and design the use and placement of Best Management Practices to effectively prohibit the discharge of pollutants from the construction site.

## Division of Safety of Dams

As required by the State Water Code (Division 3), the supervision of the safety of non-federal dams in California is under the jurisdiction of the California Department of Water Resources, Division of Safety of Dams (DSOD). The Water Code defines dams as all artificial barriers that are 25 feet or more high or have an impounding capacity of 50 acre-feet or more. All of the seasonal storage facilities under consideration are considered jurisdictional under DSOD requirements.

DSOD administers a formal application process, which includes reviewing plans and specifications for the construction of new dams or for the enlargement or alteration of existing dams. Application requirements are open-ended; DSOD can request “such other appropriate information as may be necessary in a given instance.” Generally, DSOD would expect rigorous geologic and hydrologic studies, as well as preliminary maps, plans, and specifications. DSOD must grant written approval before construction can begin. During construction, DSOD conducts inspections including identifying conditions that may require design changes, checking for compliance with approved plans and specifications, and approving foundations before material is placed. Following the completion of construction, DSOD must issue a Certificate of Approval before water can be impounded. In addition to this review process for new or enlarged facilities, DSOD conducts routine inspections of operating facilities to ensure that adequate maintenance is being performed and, if necessary, directs the correction of any deficiencies.

Pre-application consultations are recommended to ensure that DSOD personnel are aware of the project and pending application.

Following submittal of the application, DSOD is required to act (approve or disapprove) “as soon as practicable” after receiving all necessary technical information. It is expected that the application review period would depend on the complexity of the project. Simple impoundments could be authorized in as little as 3 months.

## California Occupational Safety and Health Administration

Generally, the California Occupational Safety and Health Administration (CalOSHA) requires permits for work that by its nature involves substantial risk of injury (8CCR341). Types of work that require a permit include: (1) construction of trenches or excavations that are 5 feet or deeper and into which a person is required to descend; (2) construction or demolition of any building, structure, scaffolding, or falsework more than three stories (36 feet) high; and (3) the underground use of diesel engines in working mines and tunnels.

Permits for construction of trenches or excavations that are 5 feet or deeper and into which a person is required to descend can be issued within 1 week after application submittal. The applicant must have a written Injury and Illness Prevention Program (Title 8, CCR Section 3203 [8CCR3203]) that identifies safe and healthful work practices for the proposed work. In the case of excavations and trenching, the applicant must have a “competent person” (as defined in Title 29 CFR Section 1926.650 [29CFR1926.650]) who is capable of identifying existing and predictable hazards in the area surrounding the excavation and who has authorization to take prompt corrective measures to eliminate such hazards.

## California Department of Fish and Game

The California Department of Fish and Game (CDFG) is responsible for conserving, protecting, and managing California’s fish, wildlife, and native plant resources. To meet this responsibility, the law requires any person, state or local governmental agency, or public utility to notify CDFG before beginning an activity that would substantially modify a river, stream, or lake. This includes rivers or streams that flow at least periodically or permanently through a bed or channel with banks that support fish or other aquatic life and watercourses having a surface or subsurface flow that support or have supported riparian vegetation. If CDFG determines that the activity could substantially adversely affect an existing fish and wildlife resource, a Lake or Streambed Alteration Agreement is required, and the proposed project, unless it is otherwise exempt, would have to be reviewed in accordance with CEQA (Pub. Resources Code, § 21000 et seq.) before work may begin. Protective measures must be recommended by CDFG within 30 days following a completed notice (application) based on 50 percent design. The EIR prepared to achieve CEQA compliance must be certified prior to issuing the agreement. A CDFG Streambed Alteration Agreement would be required at the Alpha Farm sites for the emergency spillway that extends into Roseland Creek. Additional studies (e.g., wetland delineations) expected to be completed for the Project EIR would determine necessity for Streambed Alteration Agreements at the other proposed sites.

If the proposed action is likely to adversely affect state endangered or threatened species or species proposed for state listing, the project proponent must consult with CDFG. Section

2080 of the Fish and Game Code prohibits “take” of any species that is determined to be an endangered species or a threatened species. The California Endangered Species Act (CESA) allows for take incidental to otherwise lawful development projects. A number of the proposed sites would be expected to require concurrence from CDFG regarding CESA. A Habitat Management Plan must be prepared to evaluate species impacts and identify mitigation measures that would minimize effects. Permit approval usually occurs within 26 weeks after application submittal based on 50 percent design.

## North Coast Regional Water Quality Control Board

Waste Discharge Requirements (WDRs) are adopted by the RWQCBs to regulate discharge of reclaimed water to land. It is anticipated that by coordinating the overall program closely with the North Coast RWQCB, the existing WDRs would be modified to recognize any seasonal storage sites and new WDR applications would not be needed.

In addition, under Section 401 of the federal Clean Water Act, the State must certify that any activity subject to a permit issued by a federal agency, such as the USACE, meets all state water quality standards. In California, the RWQCBs are responsible for certification actions for activities subject to any permit issued by the USACE pursuant to Section 404.

Minor construction dewatering may be required at each of the proposed sites. Construction dewatering would require a low-threat discharge authorization. This authorization is most likely in the form of a Notice of Intent filed under a regional general permit for low-threat discharge.

## Sonoma County Permit and Resource Management Department

The Sonoma County Permit and Resource Management Department (PRMD) is responsible for issuing many of the permits in the unincorporated areas of Sonoma County (Kelly Farm, Brown Farm, Alpha Farm). Permits for 3836R (construction in flowing waters), roadway encroachment, grading, and transportation would be obtained from PRMD as needed. These permits generally have a review period not to exceed 2 months (review for Transportation Permit is 1 day).

In addition, permits for geotechnical borings and the construction or decommissioning of wells in Sonoma County are issued by the PRMD. The permit application must be filed by the drilling contractor and requires about 1 to 2 weeks to process.

## Sonoma County Department of Emergency Services

The Department of Emergency Services is responsible for regulating hazardous materials storage sites. The Hazardous Materials Division has the responsibility for the County's Certified Unified Program Agency programs, which include the Hazardous Materials Business Plans (HMBP). Businesses that handle hazardous materials in California are required to file HMBPs. The HMBP consists of basic business information, an inventory of hazardous materials handled at a given site, and emergency response and training plans. Generally, hazardous materials must be reported if they are handled in quantities equal to

or greater than 55 gallons for liquids, 200 standard cubic feet for compressed gases, and 500 pounds for solids.

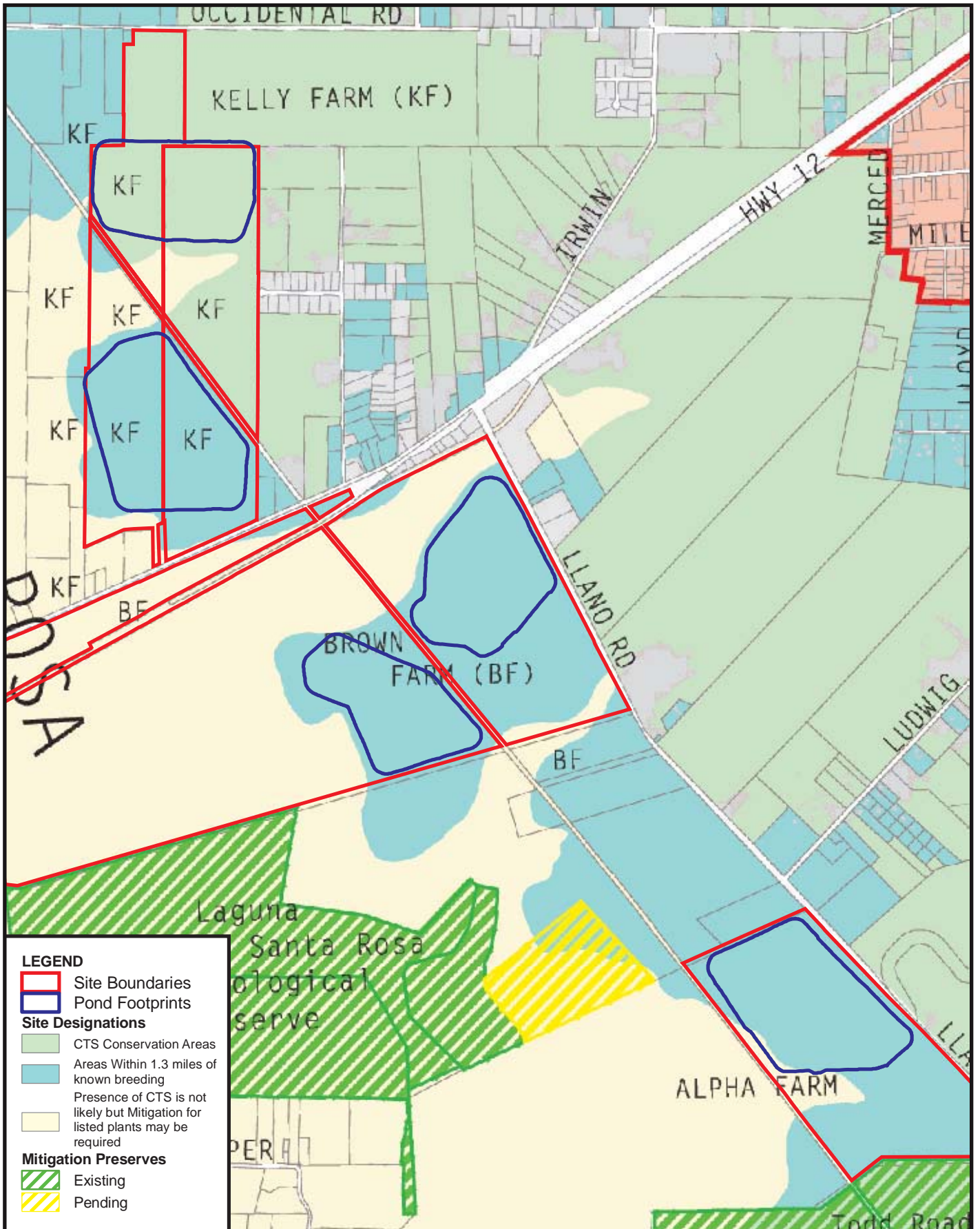
The HMBP is to be submitted within 30 days of start of operations.

## Sonoma County Water Agency

The Sonoma County Water Agency (SCWA) provides wholesale water and other services to communities in Sonoma and Marin Counties. A 48-inch SCWA pipeline crosses the Kelly Farm, Brown Farm, and Alpha Farm properties, and the development of storage facilities at these sites would require authorization (Encroachment Permit or easement) from SCWA.

## Figures

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**LEGEND**

- Site Boundaries
- Pond Footprints

**Site Designations**

- CTS Conservation Areas
- Areas Within 1.3 miles of known breeding
- Presence of CTS is not likely but Mitigation for listed plants may be required

**Mitigation Preserves**

- Existing
- Pending

*Note: Background imagery acquired from Santa Rosa Plain Conservation Strategy Map*

0 750 1,500  
Feet

N

IRWP MASTER PLAN

Seasonal Storage

WINZLER & KELLY  
CONSULTING ENGINEERS

**FIGURE 1  
STORAGE POND FOOTPRINTS**