



Technical Memorandum

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To: Dane Downing (Covelo CSD) Project: Covelo Community Services District (CSD) Wastewater Treatment Plant Improvements Project

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Subject: Categorical Exemption Analysis Memorandum

This memorandum serves as the technical documentation of an environmental analysis performed by Wood Environment & Infrastructure Solutions, Inc. (Wood) for the Covelo Community Services District (CSD) Wastewater Treatment Plant (WWTP) Improvements Project (Project) located in the unincorporated community of Covelo, in Mendocino County, California. The intent of the analysis is to document whether the project is eligible for a Class 2 Categorical Exemption (CE) under the California Environmental Quality Act (CEQA) Guidelines Section 15302. This memorandum provides an evaluation of the project's consistency with the requirements for a Class 2 CE and the exceptions to CEs per CEQA Guidelines Section 15300.2.

Based on the environmental analysis completed, the proposed Project qualifies as a Class 2 CE, as a replacement and reconstruction of an existing structure and facility. The proposed Project includes the following four reconstruction improvements: 1) installation of two new 5-foot diameter manholes and new sewer line connections; 2) installation of a 1.5-foot wide trash screen in a below-grade concrete chamber; 3) replacement of an existing wet well and aboveground lift station, and new force main; and 4) relocation and upgrade of electrical and communication lines, and other wet utilities including wastewater and sanitary sewer lines from the existing WWTP facility.

Other proposed infrastructure improvements include the installation of an electrical control system in the existing control and office building, and the replacement of the system's main circuit breakers and pump switch system. These control systems would be installed in a weather-proof receptacle located next to an electrical panel housed in the existing controls and office building. Site improvements would include minor site grading and the installation of one 20-foot tall aluminum light pole with a light-emitting diode fixture to illuminate the screenings bin and influent pump station. No improvements are proposed for the oxidation or percolation ponds. The replacement facilities would be located on the same site as the structures that are being replaced. They will have substantially the same purpose and capacity as the structure replaced. The replacement and reconstruction of the existing WWTP facility would also involve negligible or no expansion of capacity.



The following are exceptions to the CEQA Guidelines Section 15302 Class 2 CEs:

Exception (a) A categorical exemption shall not be used for a project under Classes 3, 4, 5, 6, and 11 if the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The proposed Project qualifies as a Class 2 CE, as a replacement and reconstruction of an existing structure and facility. It is not located near an environmental resource of hazardous or critical concern where designated, mapped, and officially adopted pursuant to law by federal, state, or local agencies. According to the Biological Assessment Report completed for the proposed Project, the riparian woodland habitat along Town Creek would be avoided during construction activities (Wood 2020a). Therefore, exception (a) would not apply to the proposed Project.

Exception (b) A categorical exemption shall not be used for a project when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The proposed Project involves the implementation of upgrades to the existing Covelo CSD WWTP. These improvements consist of the replacement of an existing aboveground lift station, and wet well underneath. No successive projects of the same type in the same place would occur over time. The project is also consistent with the Mendocino County General Plan and Zoning Code (Mendocino County 2009). Therefore, potential cumulative effects are not anticipated, and Exception (b) would not apply to the proposed Project.

Exception (c) A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The proposed Project would not result in any significant effects on the environment due to unusual circumstances. The Project site is located within the existing Covelo CSD WWTP site and the unincorporated community of Covelo. The proposed Project would result in minor and temporary air quality emission associated with construction (Wood 2020b). While the Project site is located near a sensitive resource area, such as the riparian woodland corridor of Town Creek, the proposed Project was designed to avoid the riparian woodland corridor and includes environmental protection measures to minimize any impacts to the riparian woodland habitat (Wood 2020a). Three previously recorded pre-historic sites extend within 0.5 mile of the Project site, but none are within the Project's approximate 0.25-acre Area of Potential Affect (APE), and the proposed Project does not have the potential to impact other unknown historical resources in the vicinity (Wood 2020c). Therefore, Exception (c) would not apply to the proposed Project.

Exception (d) A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State scenic highway.

Based on the California Department of Transportation's California Scenic Highway Mapping System, there are no scenic highways near the project site (Caltrans 2020). The closest officially designated or eligible State scenic highway is U.S. Highway 101 located near Willits, approximately 50 miles west of the Project site (Caltrans 2020). Given the distance of the Project site to U.S. Highway 101, the proposed Project would not be visible from this highway. For these reasons, the proposed Project would have no impact on scenic resources within a State scenic highway and Exception (d) would not apply.

Exception (e) A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

Government Code Section 65962.5 requires the Department of Toxic Substance Control and State Water Resources Control Board to compile and regularly update a regulatory site listing. The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Health and Safety Code Section 116395. Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste.

There are ten listed Leaking Underground Storage Tank (LUST) cleanup sites within the Project vicinity, many of which are under investigation and assessment, verification monitoring, closed cases, or permitted underground storage tanks (DTSC 2020; SWRCB 2020). However, the Project site is not currently listed as a cleanup site pursuant to Government Code Section 65962.5 (Cortese List) (Cal EPA 2020; DTSC 2020; SWRCB 2020).

Exception (f) A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

According to the Historical Property Identification Report, there are no historical resources within the Project APE (Wood 2020c). The nearest recorded historical property is located approximately 220 feet to the northwest of the Project APE (Wood 2020c). The existing aboveground lift station and wet well were constructed between 1976 and 1977 and are not more than 50 years old (Dennis 2020). Further, the majority of the Project APE appears to have been substantially disturbed during past construction activities associated with the existing Covelo CSD WWTP (Wood 2020c). Therefore, the proposed Project would not result in a substantial adverse change in the significance of a historic resource and Exception (f) would not apply.

Conclusion

Based on this analysis, the proposed Project meets all criteria for a Class 2 CE pursuant to CEQA Guidelines Section 15302.

Sincerely yours,
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