

Attachment B  
Covelo Community Services District  
Collection System and WWTP Improvements Project

Reasons why Project is Exempt

**Class 1 Existing Facilities**

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. This project is replacing existing sewerage facilities in kind. This project does not include any expansion of the system or increase in capacity of the system.

**Class 2 Replacement or Reconstruction**

Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. This project is replacing existing sewerage facilities in kind. This project does not include any expansion of the system or increase in capacity of the system.

**Class 3 New Construction or Conversion of Small Structures**

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. This project includes a new canopy structure which will be construction over and to protect the existing Ozone equipment.

**Class 4 Minor Alterations to Land**

Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. The project will entail the minor removal of vegetation behind East Lane above the existing sewer for that portion of sewer replacement. The project will also include trenching in backfilling in that area and along Commercial Street where the surfaces will be restored.

**Exceptions to Exemptions Not Applicable**

None of the Exceptions to Exemptions Apply to the proposed project as further described below:

**Location:** A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. The Project work is occurring in areas previously disturbed where sewer already exists. Most of this sewer work is along Commercial Street. The canopy will be installed at the existing WWTP above an existing structure. The environment where the work is being completed is already previously disturbed and developed and so the environment is not particularly sensitive. A sensitive plant survey will be conducted in spring and all sensitive plant populations will be avoided during construction.

**Cumulative Impact:** All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant. Replacement of existing sewer utilities is a normal part of utility maintenance and the effects of such work accumulated over time do not result in significant impacts.

**Significant Effect:** 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. There are no unusual circumstances that apply to this project as the work that will be completed is typical of this type of work and there is nothing unusual about the circumstance or context of the work being performed.

**Scenic Highways:** 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. This exception does not apply as this project is not on a designated state scenic highway and the proposed work does not adversely affect scenic resources.