

Notice of Exemption

Appendix E

To: Office of Planning and Research
 P.O. Box 3044, Room 113
 Sacramento, CA 95812-3044
 County Clerk
 County of: Humboldt
 825 5th Street
 Eureka CA 95501

From: (Public Agency): City of Arcata
736 F Street
Arcata, CA 9521
 (Address)
dloya@cityofarcata.org

Project Title: Plunkett Road Watermain and Booster Pump Replacement

Project Applicant: City of Arcata

Project Location - Specific:
Plunkett Rd. from Melody Ct. to Tank No.13, Dubeault and Jacoby Crk Rd intersection

Project Location - City: Arcata Project Location - County: Humboldt

Description of Nature, Purpose and Beneficiaries of Project:
 The Project is to retrofit the existing Plunkett Road water network and Booster Station #10 for the Jacoby Creek Water District's system as managed by the City of Arcata. The Plunkett Road waterline is very susceptible to breaks, due to geological instability in the area and the age of the pipes. To ensure public safety in case of geologic events, the proposed project will include replacement of the existing pipeline with new pipe. Additionally, upgrades will be performed at the nearby pump station that serves this portion of the water system.

Name of Public Agency Approving Project: City of Arcata

Name of Person or Agency Carrying Out Project: City of Arcata Engineering Department

- Exempt Status: **(check one):**
- Ministerial (Sec. 21080(b)(1); 15268);
 - Declared Emergency (Sec. 21080(b)(3); 15269(a));
 - Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
 - Categorical Exemption. State type and section number: Class 1,2,3 (Sec. 15301, 15302, 15303)
 - Statutory Exemptions. State code number: _____

Reasons why project is exempt:
 The Project includes reconstruction of the existing watermain infrastructure and will have the same purpose and capacity, with a negligible expansion of use. Utilities within the Project Area will be upgraded and/or realigned to be compatible with Project improvements, consistent with Section 15303 (d). The Project will not result in the removal of regulated vegetation or sensitive natural communities and BMPs are in place in ensure impacts to traffic and ambient noise will be less than significant (see attached CEQA memorandum for additional information).

Lead Agency
 Contact Person: Netra Khatri, City Engineer Area Code/Telephone/Extension: (707)825-2173

- If filed by applicant:**
1. Attach certified document of exemption finding.
 2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature:  Date: 3/20/25 Title: _____

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code. Date Received for filing at OPR: _____
 Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Memorandum

March 18, 2024

To	David Loya, Director of Community Development, City of Arcata		
Cc	Netra Khatri, City Engineer, City of Arcata		
From	Steven Luu, Senior Project Manager	Tel	+1 707 825 2152
Subject	Plunkett Road Watermain and Booster Pump Replacement	Project no.	2023-W-001_PLUNKETT ROAD (63-0006)

1. Introduction

The City of Arcata has performed a California Environmental Quality Act (CEQA) compliance review for Plunkett Road Watermain and Booster Pump Replacement (Project). This memorandum provides a brief description of the Project, summarizes the CEQA exemptions for which the Project qualifies, and reports the findings of supporting documentation.

2. Project Background and Overview

The Project is to retrofit the existing Plunkett Road water network and Booster Station #10 for the Jacoby Creek Water District's (JCWD) system as managed by the City of Arcata (City). Through contractual agreement, the City sells water directly to JCWD customers, maintains and repairs the JCWD distribution system, and fulfills regulatory requirements for the JCWD (including monthly reporting and sampling). The portion of the watermain to be replaced consists of 3,000 linear feet of 8" diameter pipe from the intersection of Melody Court and Plunkett Road up to Water Tank #13 at the top of Plunkett Road. This watermain is susceptible to breaks due to geological instability in the area alongside the age of the waterline. The waterline is primarily constructed with asbestos cement (AC) pipe material installed in the 1970's before seismic design provisions were required by code and has exceeded its service life as the City has had to conduct repairs as much as 4 to 5 times per year.

Since this line is a common fill/feed line, Tank #13 (60,000 gallons) begins to drain when a major break occurs which means interruption in domestic water and lack of water for fire fighting for days and potentially weeks in an emergency scenario associated with a seismic event.

The topography in the project area is steep and geologically unstable with portions of Plunkett Road having shifted 20 to 25 feet. The well-documented brittle and fragile nature of AC pipe makes this section of the system particularly susceptible to damage and breaks during earthquake events.

Booster Station #10 (Plunkett Booster Station) is near the intersection of Jacoby Creek Road and Dubeault Road, approximately 850 feet northwest of the intersection of Jacoby Creek Road and Plunkett Road. There is currently no building or shelter or back up power source at this location. The Project proposes to replace the existing aging pump infrastructure and control system with new piping and pumps within a 20'x15' concrete masonry unit block structure. This will allow installation of upgraded service panels, controls and a backup generator to ensure Tank 13 can be filled during a power outage event to maintain domestic flows and firefighting capability in the area. Development of the Booster Station structure will require easements and right of way acquisition from a private landowner and an encroachment permit from the County of Humboldt.

Construction is anticipated to start in April of 2025 and be completed by October 2, 2025. Up to 6 months will be needed to construct the Project. Staging will occur within the evaluated Project Area. Access to the Project and staging areas will be via paved roads.

The Project does not include the removal of regulated vegetation or habitats such as wetlands or Sensitive Natural Communities. If possible, vegetation affected by construction will be removed outside of nesting bird season. If vegetation removal outside of nesting bird season is infeasible, pre-construction nesting bird seasons will be conducted. If nests are identified, appropriate buffers will be established in coordination with the California Department of Fish and Wildlife. A sensitive plant species was identified within the outskirts of the project area and temporary construction fencing will be installed along the perimeter of the project area to protect the plant community.

Temporary water service and traffic control will be implemented as part of construction to limit disruption to domestic water service to residences. One way traffic will be maintained at a minimum along the project areas impacted by construction to ensure residents can enter and exit their properties and that emergency service can be maintained.

Construction would involve the use of conventional construction equipment and ground disturbing activities. Most vertical excavation will generally extend less than 5 feet below the existing ground with a deeper excavation required to provide separation from existing utilities if needed.

3. Review for CEQA Exemption

The Project was reviewed relative to the CEQA Guidelines to determine if it qualifies under a class of projects that has been determined not to have a significant effect on the environment and which may be exempted. The Project meets the criteria under Section 15301 (c) (Existing Facilities), Section 15302 (c) (Replacement or Reconstruction), and Section 15303 (d) (New Construction or Conversion of Small Structures), which are described below.

Section 15301 (c): Existing Facilities

Class 1 - Section 15301(c) consists of 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 existing or former use. Section 15301 (c) specifically applies to existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities. This includes grading for the purpose of public safety. The Project includes alteration to the existing interchange facility. The upgraded facility will not add new automobile lanes or substantially increase the capacity of the roadways. The Project will result in a negligible expansion of use, if any, and will benefit public safety. The Project includes alterations to structures in the form of replacement of existing watermain infrastructure. This is a negligible expansion of use and is not growth inducing, therefore meeting this criterion.

Section 15302 (c): Replacement or Reconstruction

Class 2 - Section 15302 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. Section 15302 (c) specifically applies to replacement of existing utility systems and/or facilities involving negligible or no expansion of capacity. The Project includes reconstruction of the existing watermain infrastructure and will have the same purpose and capacity. This is a negligible expansion of use and is not growth inducing, therefore meeting this criterion.

Section 15303 (d): New Construction or Conversion of Small Structures

Class 3 - Section 15303 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. Section 15303 (d) specifically includes water mains, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction. Utilities within the Project Area will be upgraded and/or realigned to be compatible with Project improvements, consistent with Section 15303 (d).

3.1 CEQA Guidelines Section 15300.2 Exceptions

Section 15300.2 of the CEQA Guidelines includes a list of circumstances in which a categorical exemption cannot be used. As part of a review for exemption, the City of Arcata evaluated the Project against each of the applicable exceptions, including project location, cumulative impacts, significant effects due to unusual circumstances, scenic highways, hazardous waste sites, and historical resources.

- a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- b) Cumulative Impact. All exemptions are inapplicable when the cumulative impact of successive projects of the same type in the same place over time is significant.
- c) 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.
- d) 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.
- e) Hazardous Waste Sites. 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.
- f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

As part of this review for exemption, the City of Arcata evaluated the Project against each of the applicable exceptions, summarized below.

15300.2 (a) - Location

CEQA Guidelines Section 15300.2 (a) specifies that certain classes of exemptions are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. For this Project, Section 15300.2 (a) applies to the exemptions used under Section 15303 (Class 3). The Project will be located within a developed area, and Project activities are localized and temporary and are not anticipated to result in any long-term or significant impacts.

The facility is already developed, and natural habitat is limited as a result. The Project site for the linear watermain replacement is an anthropogenic roadway. Vegetation removal to construct the booster station will

be limited to non-native blackberries, forbs and grasses along the perimeter of the existing booster station and residential lawn. A biological review of the Project Area was completed to confirm that Sensitive Natural Communities, special status plants or wildlife, and wetlands will not be impacted. Critical habitat pursuant to the federal Endangered Species Act is not present. Aquatic habitat is also absent (GHD Botanical Survey and Biological Resources Evaluation August 2021).

The Project Area is located near an Alquist-Priolo Earthquake Fault Zone; however, the Project does not include construction or operational activities that will increase the risk of fault instability or seismic-related hazards. Additionally, a Federal Emergency Management Agency (FEMA) flood hazard zone is not present in the Project area. The cultural resources investigation prepared for the Project did not identify archaeological or historical resources within the Project Area (Roscoe and Associates 2021).

No new lighting is proposed as part of the linear watermain project. Security lighting for the booster station will consist of wall packs that are downcast and shielded and will meet International Dark Sky Standards.

Based on the review, the location exception under CEQA Guidelines Section 15300.2(a) does not apply to the Project.

15300.2 (b) - Cumulative Impact

CEQA Guidelines Section 15300.2(b) specifies that a Categorical Exemption shall not be used when the cumulative impact of successive projects of the same type in the same place over time is significant. No potentially cumulative projects were identified during the Project's biological review

15300.2 (c) - Significant Effect from Unusual Circumstances

CEQA Guidelines Section 15300.2(c) specifies that 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 environment within and adjacent to the Project Area is not unusually sensitive. Construction impacts will be temporary. The future use of the Project Area will be consistent with the existing use.

No permanent impacts to designated critical habitat or sensitive species are expected. No adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan exists for the Project Area. The proposed improvements are consistent with exempt classes of projects and the Project does not have a feature that distinguishes it from others in the exempt classes, such as size or location. The Project will not impact an environmental resource of hazardous or critical concern. No unusual circumstances have been identified, and no potentially significant impacts that could occur due to the Project have been identified. Therefore, the exception under Section 15300.2(c) is not applicable.

15300.2 (d) - Scenic Highways

CEQA Guidelines Section 15300.2(d) specifies that 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. Plunkett Road and Jacoby Creek Road in the Project area are not officially designated State scenic highways and no other State-designated scenic highways are located adjacent to or in view of the Project (Caltrans 2024). Therefore, the exception under Section 15300.2(d) is not applicable to the Project.

15300.2 (e) - Hazardous Waste Sites

CEQA Guidelines Section 15300.2(e) specifies that a Categorical Exemption shall not be used for a project located on a site which is included on a list compiled pursuant to Section 65962.5 of the Government Code. To determine if any portion of the Project conflict with Section 65962.5 of the Government Code and to complete environmental due diligence related to hazardous resources, the Department of Toxic Substances Control

Envirostor database and State Water Resource Control Board GeoTracker were consulted to identify areas of potentially impacted soil and/or groundwater limited to a 2,000 foot radial study area that may require special handling and disposal during construction or will potentially pose a health exposure risk to construction workers. Two underground storage tank sites were identified on Geotracker but are listed as closed projects. As such, there are no recognized environmental conditions or known contamination within the Project Area.

The Project site is not included on any of the hazardous waste lists pursuant to Section 65962.5 of the Government Code, and no adjacent sites were identified where contamination may have extended onto the Project Area. Therefore, the exception under Section 15300.2(e) does not apply to the Project.

15300.2 (f) - Historical Resource

CEQA Guidelines Section 15300.2(f) specifies that a Categorical Exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource. A cultural resources investigation was completed for the Project and concluded there are no historic properties, inclusive of considerations for archaeological resources, identified within the Project Area (Roscoe and Associates 2021). Therefore, the Project will not impact any known historical resources. Therefore, the exception under Section 15300.2(f) does not apply to the Project.

4. Conclusion

The Project qualifies for a combination of Class 1, Class 2, and Class 3 Categorical Exemptions from CEQA under Sections 15301 (c), 15302 (c), and 15303 (d) of the CEQA Guidelines. The environmental review and documentation reported above did not identify any significant effects that will occur from the Project, and the exceptions listed in Section 15300.2 of the CEQA Guidelines were found not to apply to the Project.

5. References

- Caltrans 2024. Scenic Highway System Lists. Available online: https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx Accessed on May 23, 2024.
- GHD 2021. Biological Resources Evaluation Plunkett Road Waterline Retrofit Project. Prepared for the City of Arcata
- GHD 2021. Technical Memorandum – Arcata Plunkett Road Waterline Botanical Surveys. Prepared for the City of Arcata
- GHD 2021. Aquatic Resource Delineation for Plunkett Road Waterline Project. Prepared for the City of Arcata.
- Roscoe and Associates. 2021. Cultural Resource Investigation of the Plunkett Road Waterline Retrofit Project. Prepared for City of Arcata
- State Water Resource Control Board 2024. Geotracker. <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=plunkett+road+arcata+ca>. Accessed May 23, 2024.
- Department of Toxic Substances Control 2024. Envirostor Database. <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=plunkett+road+arcata+ca>. Accessed May 23, 2024.