

ATTACHMENT 1

MITIGATED NEGATIVE DECLARATION



CITY OF FORT BRAGG

Incorporated August 5, 1889
416 North Franklin Street
Fort Bragg, California 95437
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PROJECT TITLE: **Wastewater Treatment Plant Update**

APPLICATIONS: Coastal Development Permit (CDP 2-16), Design Review (DR 2-16)

LEAD AGENCY: City of Fort Bragg
416 North Franklin Street
Fort Bragg, CA 95437

CONTACT: **Scott Perkins**
Assistant Planner
Community Development Department
(707) 961-2823

LOCATION: The ±5.8-acre parcel is located in the City of Fort Bragg, ±2,400 feet west of Maple Street's intersection with Highway 1 at 101 West Cypress Street (APN 008-020-07).

OWNER/APPLICANT: City of Fort Bragg

GENERAL PLAN DESIGNATION: Public Facilities and Services (PF)

ZONING: Public Facilities Zoning District (PF)

Wastewater Treatment Plant Update Project

PROJECT LOCATION

The project site is located in Fort Bragg, the largest community on the Mendocino Coast, midway between San Francisco and Eureka. The project site, located within the existing Wastewater Treatment Plant (WWTP) on a 5.8-acre City-owned parcel, is less than 100 feet from the bluff edge as illustrated in **Figure 1**. The parcel address is 101 West Cypress Street, the Assessor's Parcel Number (APN) is 008-020-07, and the site is located within the California Coastal Zone.



Figure 1: Location Map

The project site is located in the northern half of Section 12, Township 18-north, Range 18-west, and the project coordinates are approximately 39° 26' 20" (39.4388°) north latitude and 123° 48' 53" (123.8146°) west longitude.¹

The project parcel is surrounded by the Georgia-Pacific Mill Site, an approximately 319-acre currently vacant but formerly developed industrial lumber mill that extended along three miles of Fort Bragg's coastline. The vacant Mill Site is currently undergoing remediation. The City of Fort Bragg's Coastal Trail is also proximate to the project parcel. The Coastal Trail traverses 82-acres extending along the coastline both north and south of the project site.

A one mile road provides access to the existing WWTP, beginning at a gate on Cypress Street and traveling along the historic Mill Site runway to the entrance of the facility. Security gates at the southern end of the runway and at the entrance to the project parcel restrict access to the WWTP. The property is surrounded by a six-foot view-obscuring cyclone security fence.



Figure 2: Wastewater Treatment Plant Aerial Image²

PROJECT PARAMETERS AND PURPOSE

Constructed in 1970, the City of Fort Bragg's existing Wastewater Treatment Plant (WWTP) is an aging facility. The project proposes to renovate and upgrade the facility to current technology and standards utilizing an activated sludge treatment process. The current WWTP has a permitted average dry weather flow capacity of 1.0 million gallons per day (MGD), which will not be increased by the proposed project. Unit processes at the existing WWTP include: mechanical screening, grit removal, primary clarification, two-stage trickling filters (primary and secondary), secondary clarification, chlorine disinfection, sludge thickening, anaerobic digestion, sludge dewatering, and sludge drying.

Over the facility's 40-year life span, the operation has undergone various expansions and upgrades; however, most equipment has now reached a 25-30 year service life. The long-term viability of several unit processes to achieve treatment objectives is becoming increasingly problematic.

¹ U.S. Geological Survey. Fort Bragg quadrangle, California [map]. 1:24,000. 7.5 Minute Series. United States Department of the Interior, USGS, 2015.

² "Aerial Photographs of the California Coastline." California Coastal Records Project. Accessed February 02, 2016. <http://www.californiacoastline.org/>.

The proposed WWTP upgrades: 1) replace the existing trickling filters with an activated sludge system (Aero-Mod SEQUOX); and 2) repurpose the clarifiers into an emergency/surge storage system that increases system redundancy and will be used to treat on-site stormwater.

PROJECT CHARACTERISTICS

Project components consist of demolition of a variety of existing features at the facility, new construction of the activated sludge system, and renovation of existing components.

Demolition

Accommodating the updated equipment will require demolition or abandonment of various existing facilities and processes, as illustrated in **Figure 3**. Facilities proposed for demolition or repurposing include the primary and secondary clarifiers, the primary and secondary biofilter, septage handling facilities, and the concrete sludge drying basin. Demolition of various accessory facilities, including sludge piping and abandonment of storm drain outfalls is likewise proposed. All activities will take place in existing disturbed locations and no removal of natural vegetation will be required for the project. Much of the proposed demolition activity will take place after the new construction of the activated sludge system, as the City must be able to process City sewage throughout the construction process.

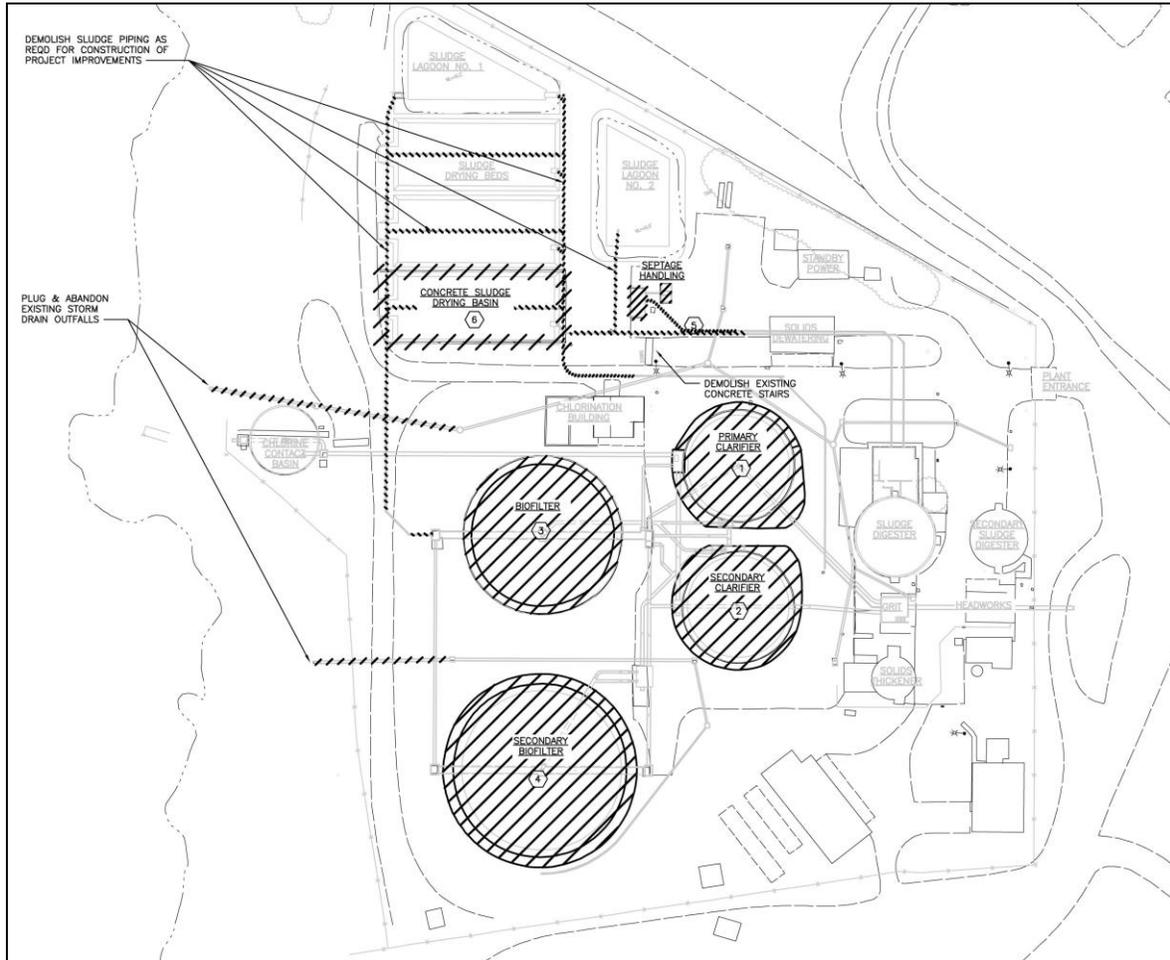


Figure 3: Demolition Plan³

³ HDR. (2015, Dec 11). *Demolition Site Plan*. (Sheet D01). [Technical drawing].

Grading

New or renovated interior site access-ways and an added or modified catchment basin will require grading and asphalt paving, as illustrated in **Figure 4**.

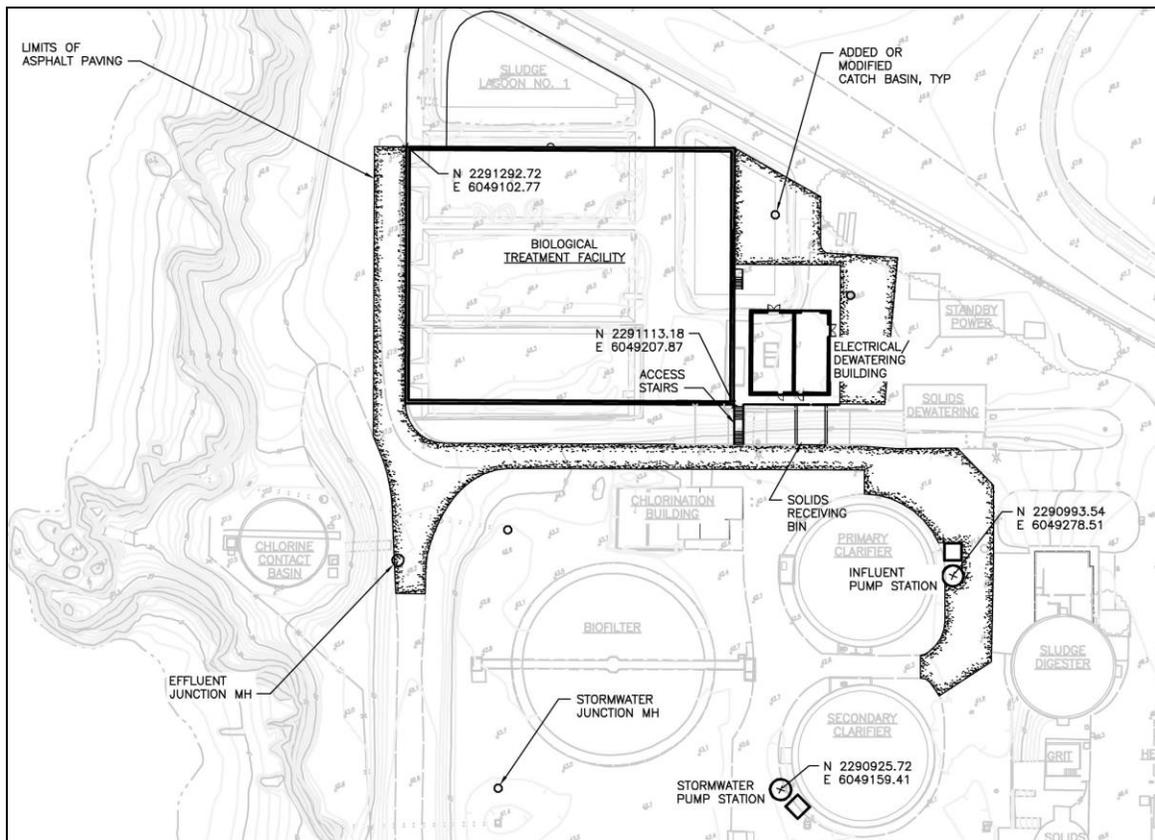


Figure 4: Grading and Paving Plan⁴

Construction

The project proposes to update the existing WWTP by installing an activated sludge treatment system. The proposed update also includes the construction of a blower building, new sludge holding area, splitter box and pump station, and conversion of the existing primary and secondary clarifiers to emergency/surge storage basins. **Figure 5** illustrates the proposed improvements.

⁴ HDR. (2015, Dec 11). *Civil Grading and Paving Site Plan*. (Sheet C02). [Technical drawing].

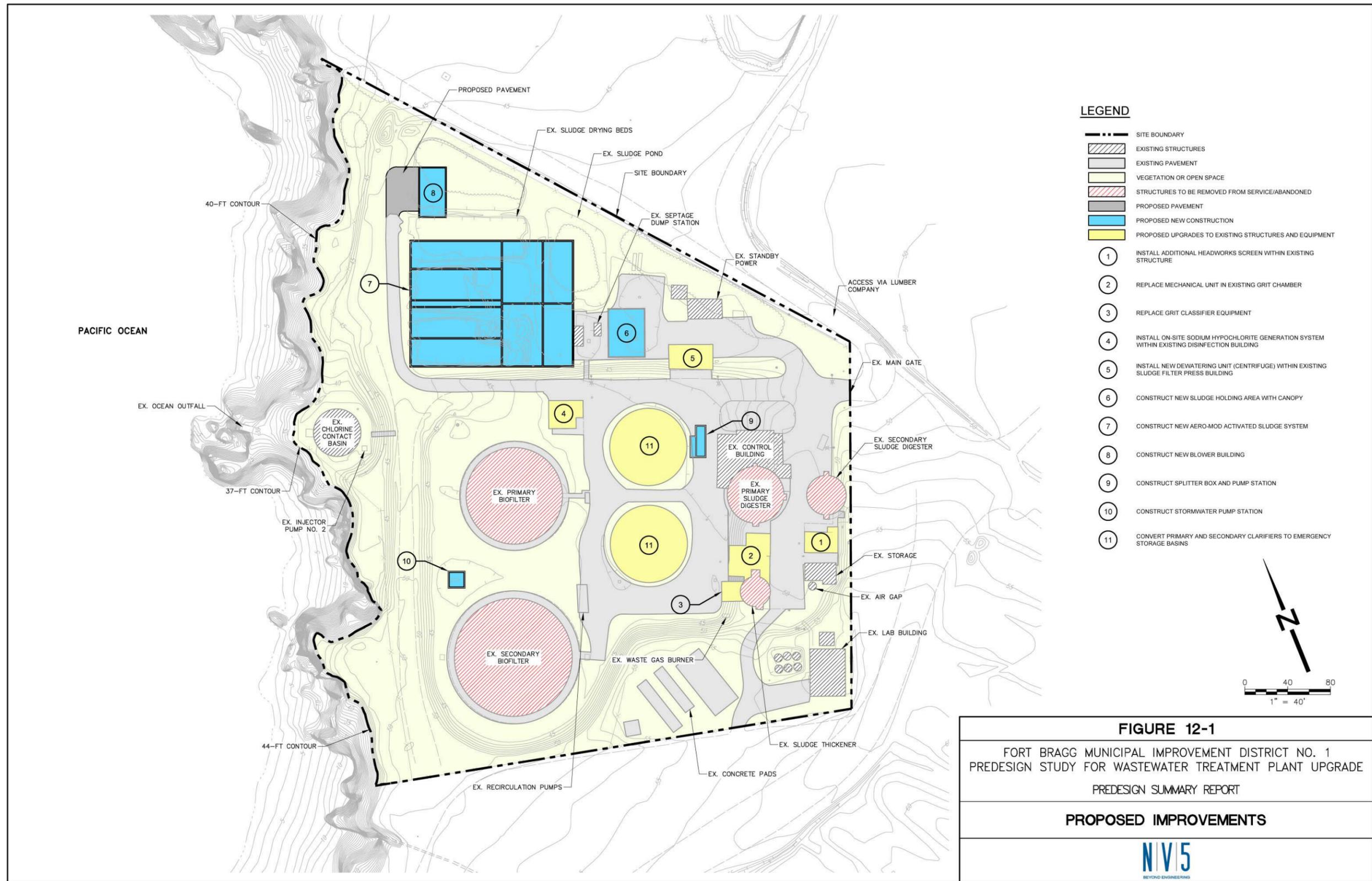


Figure 5: Proposed Improvements⁵

⁵ NV5, *Predesign Study for the Fort Bragg Wastewater Treatment Plant Upgrade Project: Predesign Summary Report*. Manteca. 2013.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages:

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance | <input type="checkbox"/> Greenhouse Gas Emissions |

DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Scott Perkins
Signature

10/5/16
Date

Scott Perkins
Printed Name

City of Fort Bragg

I. Aesthetics

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?			✓	
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			✓	
c. Substantially degrade the existing visual character or quality of the site and its surroundings?			✓	
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✓	

a. *Would the project have a substantial adverse effect on a scenic vista?*

The proposed project is not located in a mapped scenic view area as defined by the City of Fort Bragg Coastal General Plan.⁶ Map CD-1, included as **Figure 6**, locates the project in an area where “the protection and enhancement of scenic views on the former Mill Site will be addressed in a Specific Plan.” To date, the City has not adopted a final Mill Site Specific Plan. Additionally, the City’s WWTP is not part of the Mill Site.

The southern portion of the Fort Bragg Coastal Trail traverses the ocean bluffs from the north side of Noyo Bay to the south end of Soldier Bay, terminating south of the existing WWTP. Public views from the Coastal Trail are presently subject to the view-obscuring fence surrounding the WWTP property. The existing laboratory, main building, generator room, sludge and press building, and two digesters are currently visible above the fence line, back-dropped by the City and the rising hills to the east. The northern portion of the Coastal Trail presently terminates on the north side of Soldier Bay, where public views are subject to more distant and less prominent of the existing WWTP.

The proposed update to the WWTP will occur within the boundaries of the existing facility. A six-foot tall view-obscuring fence surrounds the parcel accommodating the existing and proposed development, partially shielding the view of the existing WWTP and the proposed update. The proposed structures are not of substantial scale or height to further obstruct or alter existing scenic vistas. The existing scenic vistas from public places (i.e. the Coastal Trail) would remain high in quality post-construction. The proposed WWTP update will have a less than significant impact on scenic vistas to and along the coast.

⁶ “Scenic Views in the Coastal Zone.” *Coastal General Plan*. City of Fort Bragg, 2008. 6-4.

- b. *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

The project is not visible from any State Scenic Highway, as Highway 1 is not a designated State Scenic Highway.⁷ The existing WWTP is sparsely visible from few locations along Highway 1, and the proposed update will not produce greater impacts to scenic resources. Additionally, the project will not obstruct views to trees, rock outcroppings or historic buildings.

- c. *Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*

The proposed project site is located within the development envelope of the existing WWTP. The existing site contains myriad structures and features associated with the treatment of wastewater, including two biofilters, two clarifiers, two sludge digesters, a sludge thickener and filter press, and a control building. The proposed project would include the repurposing of some existing facilities and the construction of a new activated sludge system, sludge holding area, and blower building. The proposed project would not substantially degrade the existing visual character and quality of the site.

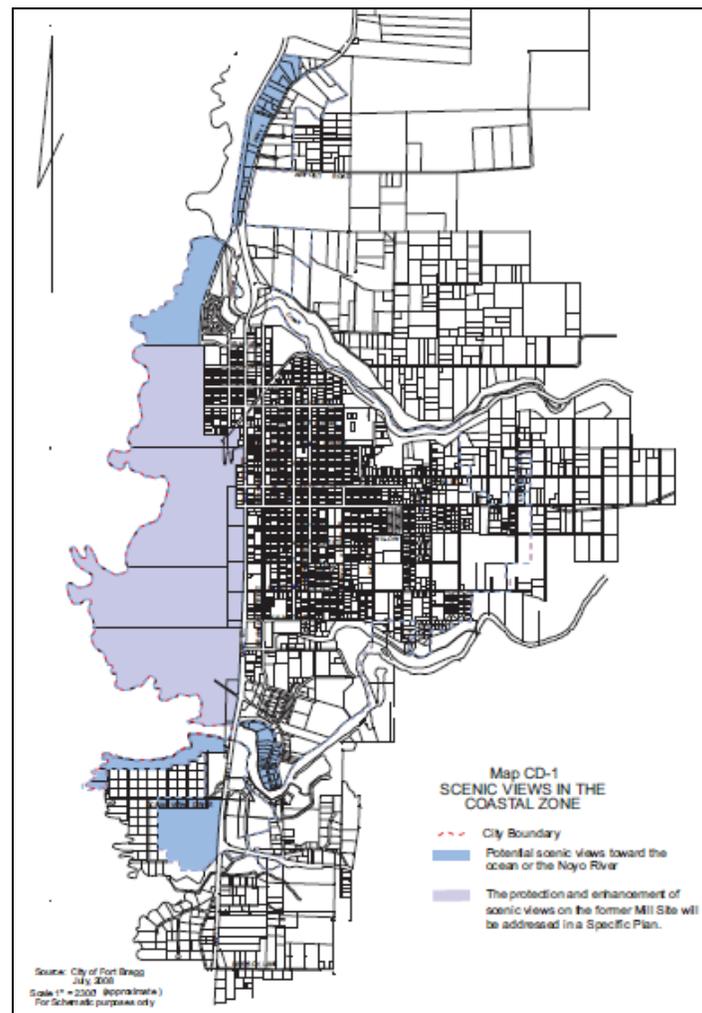


Figure 6: Fort Bragg Coastal General Plan Map CD-1

⁷ "List of Officially Designated State Scenic Highways." California Department of Transportation. 16 Mar. 2016.

- d. *Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?*

The limited lighting associated with the proposed project is necessary for safety and operation of the WWTP. Coastal Land Use and Development Code (CLUDC) Section 17.30.070 requires light fixtures be shielded or recessed to ensure that the light source is not visible beyond the property, and confines glare and reflections within the boundaries of the site to the maximum extent feasible. The CLUDC also requires light fixtures be directed downward and away from adjoining properties. Compliance with these regulations will ensure that the project impacts as a result of light or glare would be less than significant.

II. Agricultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?				✓
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				✓

- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

The proposed project would be located on a parcel designated as Public Facilities and Services (PF) in the Fort Bragg Coastal General Plan and zoned as Public Facilities and Services (PF). The project area is within the boundaries of an existing WWTP. While crop production, horticulture, orchards, and vineyards are permitted within the PF zoning district, the parcel has not been used for and is not considered prime farmland, unique farmland, or farmland of statewide importance per the Farmland Mapping and Monitoring Program.⁸ As implementation of the project will not result in the conversion of any farmland to non-agricultural uses, the project would have no impact to farmland.

- b. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

⁸ California Department of Conservation. *California Important Farmland Finder*. Accessed March 28, 2016. <http://maps.conservation.ca.gov/ciff/ciff.html>.

The proposed project is located on a parcel zoned Public Facilities and Services (PF). No agricultural uses currently exist or are planned on the site. The project would not infringe upon any lands with Williamson Act contracts. Therefore, the project would have no impact with agricultural zoning or Williamson Act contracts.

c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?*

The project parcel is zoned Public Facilities and Services (PF). No forest uses currently exist or are planned on the site. The project would have no impact on parcels zoned for forest uses.

d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

No forestlands or forest uses are present or planned on the project parcel. The proposed project would not result in the loss of forest land or the conversion of forest land to non-forest uses.

e. *Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

The surrounding land is composed of a vacant former Mill Site and the Fort Bragg Coastal Trail, neither of which is presently used for agriculture or forestry.

III. Air Quality

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?			✓	
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			✓	
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			✓	
d. Expose sensitive receptors to substantial pollutant concentrations?			✓	
e. Create objectionable odors affecting a substantial number of people?			✓	

- a. *Would the project conflict with or obstruct implementation of the applicable air quality plan?*
- b. *Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*
- c. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

The Clean Air Act, as amended in 1990, is the federal law governing air quality. Its counterpart in California is the California Clean Air Act of 1988. These laws set standards for the quantity of pollutants permitted in the air. At the federal level, these are National Ambient Air Quality Standards (NAAQS). Standards have been established for six criteria pollutants linked to potential health concerns; the criteria pollutants are: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM), lead (Pb), and sulfur dioxide (SO₂).

Under the 1990 Clean Air Act Amendments, the U.S. Department of Transportation cannot fund, authorize, or approve Federal actions to support programs or projects that are not first found to conform to the State Implementation Plan for achieving the goals of the Clean Air Act requirements. Conformity with the Clean Air Act takes place on two levels, beginning at the regional level and then at the project level. The proposed project must conform at both levels for permit approval.

The proposed project is located in Mendocino County within the North Coast Air Basin (NCAB). The project site is under the jurisdiction of the Mendocino County Air Quality Management District (MCAQMD). The MCAQMD reviews CEQA documents and has established quantitative thresholds of significance for environmental documentation. These thresholds are consistent with those developed by the Bay Area Air Quality Management District.

Mendocino County is non-attainment for the State PM-10 standard (particulate matter less than 10 microns in size).⁹ The primary manmade sources of PM-10 pollution in the area are wood combustion (woodstoves, fireplaces, and outdoor burning), fugitive dust, automobile traffic, and industry. The MCAQMD maintains full-time monitoring equipment in the City of Fort Bragg. Development within Mendocino County must comply with all applicable provisions of the Particulate Matter Attainment Plan adopted by the Mendocino County Air Quality Management District on March 15, 2005.

Temporary construction impacts are subject to Air Quality Management District Regulation 1, Rule 430, requiring dust control during construction activities. Section 18.30.080(D) of the CLUDC outlines municipal standards for dust management and prevention, which ensure compliance with applicable air quality standards. The proposed project would be consistent with these requirements.

Since the proposed project must comply with the existing standards for air quality contained in the CLUDC and the MCAQMD Particulate Matter Containment Plan, the WWTP update would not conflict with, nor would it obstruct the implementation of any air quality plan, nor would it violate any air quality standard. Additionally, the project would not contribute substantially to an existing or projected air quality violation. Finally, the WWTP update would not result in a cumulatively considerable net increase of PM-10 pollution (the only criteria pollutant for which the region is in non-attainment), provided the standards of the CLUDC and the MCAQMD Particulate Matter Containment Plan are met or exceeded.

- d. *Would the project expose sensitive receptors to substantial pollutant concentrations?*
- e. *Create objectionable odors affecting a substantial number of people?*

Users of the southern portion of the Fort Bragg Coastal Trail are currently exposed to odors from the existing WWTP at the terminus of the south trail segment. These odors intermittently affect a portion area of the trail, and only affect trail users for short periods while in close proximity to the facility, when temperatures are high and winds blow in the direction of the trail..

The proposed WWTP update will not increase the intensity or range of the existing odors; in fact, the new system will contain processes within a structure that presently occur outdoors. This modification to the existing system will decrease odors experienced off the project site. Due to the relatively short period of exposure to passersby on the Coastal Trail, and absent any increased exposure to odors caused by the WWTP update over the existing conditions, impacts would be less than significant.

⁹ Mendocino Coast Air Quality Management District of the California North Coast Air Basin. *Particulate Matter Attainment Plan*. 2005.

IV. Biological Resources

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?		✓		
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?			✓	
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		✓		
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			✓	

a. *Would the project have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife of US Fish and Wildlife Service?*

The City of Fort Bragg retained a biologist to survey the project property for special status species. Following the survey, the biologist reported the following potential project effects on special status species:

Some coastal bluff scrub, which is a special-status vegetation community, may occur on some areas within 100 feet of the project but no direct impacts to this plant community would occur. Primarily, non-native iceplant covers the bluff area.

The site was inspected for special-status plants and animals, and while none were documented from the site visit there is the potential for some species to occur. However, no special-status rare plants or animals are expected to occur where there would be direct impacts because these areas do not support habitat for such species. It is possible that some rare plants, such as Blasdale's bent grass, and rare animals, such as the Ten Mile shoulderband snail and nesting birds, could occur within 100 ft. of the project.

In the event that some of these species should occur within 100 ft. of the proposed project, mitigation measures can be implemented. Such measures would include the presence of a biological monitor during project construction to ensure that nesting birds or shoulderband snails are not impacted, and the restoration of bluff habitat by removing non-native, invasive iceplant.¹⁰

While the biologist reports a low likelihood of special-status species present at or near the project site, **Mitigation Measures BR1** and **BR2** is recommended to comply with the biologist's recommendations and reduce project impacts to a less than significant level.

Mitigation Measure BR1: The project biologist shall conduct additional surveys at least 100 feet from proposed development when Blasdale's bent grass and coastal bluff scrub is identifiable. If either Blasdale's bent grass or coastal bluff scrub are identified within 100 feet of proposed development, the City shall complete habitat restoration, per a habitat restoration plan prepared by the project biologist for the removal of non-native, invasive iceplant, and transplanting of any rare plants into restored bluff habitat. Removal of iceplant and/or reseeding of rare plants, as prescribed by the project biologist and outlined in a habitat restoration plan, shall be complete to the satisfaction of the biologist prior to final inspection of the Wastewater Treatment Plant.

Mitigation Measure BR2: A biologist shall perform preconstruction surveys for the Ten Mile shoulderband snail and nesting birds, spanning an area at least 100 feet beyond the limits of proposed development. If shoulderband snail or nesting birds are determined to be present, construction shall be stopped until such time that the project biologist in partnership with the California Department of Fish and Wildlife determine appropriate mitigation to eliminate or limit project impacts to the special-status species to a less than significant level.

- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?*
- c. *Would the project have a substantial effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means?*

¹⁰ Wear, Kyle, M.A. *Preliminary Wetland and Biological Survey - City of Fort Bragg Wastewater Treatment Facility Upgrade.*

The project biologist also surveyed the property for wetlands and riparian areas. There are no wetlands on site. There is a grease lagoon which serves as part of the WWTP process and has been excavated and used on a regular basis as a storage area for the City's grease waste from the WWTP. The proposed demolition activities include decommissioning the grease pit using fill material generated by the on site construction.

The proposed project would not result in temporary or permanent impacts to wetlands, as no wetland will be disturbed by the construction project.

- d. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife corridors, or impede the use of native wildlife nursery sites?*

The project is proposed within the footprint of an existing Wastewater Treatment Plant. The project biologist did not identify native resident or migratory fish or wildlife on the site. However, recommended **Mitigation Measure BR2** requires a biologist to survey the project site for nesting birds prior to construction, and prescribes remedies to offset any potential impacts. Compliance with this mitigation measure will ensure that project impacts to native resident or migratory wildlife will be less than significant.

- e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

There are no trees proposed for removal as a result of the WWTP update; therefore, the project would not conflict with a tree preservation policy or ordinance.

The WWTP is located in the California Coastal Zone, and is subject to the City of Fort Bragg's Local Coastal Program (LCP). The LCP includes the Coastal Land Use and Development Code (CLUDC) and the City of Fort Bragg Coastal General Plan. Approval of the proposed WWTP update requires a Coastal Development Permit, which is subject to the various policies of the LCP, including ordinances protecting biological resources. Approval of the Coastal Development Permit would require the project to be consistent with the applicable policies of the LCP. **Mitigation Measure BR3** requires approval of a Coastal Development Permit prior to initiation of the WWTP update.

Mitigation Measure BR3: A Coastal Development Permit shall be approved prior to the initiation of development to ensure that the project would not conflict with any local policies or ordinances protecting biological resources.

- f. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?*

There are no habitat conservation plans or natural community conservation plans associated with this property or habitats or communities located on this property. The project would not conflict with any habitat conservation plans or natural community conservation plans.

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V. Cultural Resources

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?				✓
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?				✓
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				✓
d. Disturb any human remains, including those interred outside of formal cemeteries?				✓

- a. *Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?*
- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*
- c. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic features?*
- d. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

ALTA Archaeological Consulting performed an archaeological survey report for the project dated February 2016.¹¹ The survey included a records check by the Northwest Information Center on January 13, 2016, which indicated that numerous cultural resource studies have been conducted within the one-half mile records search area. Previous studies evaluated the historical significance of standing structures associated with the Mill Site property, and a manuscript documenting the history of the Mill Site. The review found that no cultural resources are known within the WWTP project area.

On January 21, 2016, the archaeologist surveyed the project area for cultural resources. Following the records search and the field survey, the archaeologist determined that no cultural, historic, or archaeological resources are present within the project area, and no mitigation measures are recommended. It is a standard condition of approval for Coastal Development Permits that if previously unidentified cultural materials are unearthed during construction, work would be halted in that area until a qualified archaeologist can assess the significance of the find. As a result, any impacts to cultural resources would be less than significant.

¹¹ DeGeorgey, Alex, M.A., RPA. *Archaeological Survey Report: Fort Bragg Municipal Wastewater Treatment Plant Upgrade Project*. 2016.

VI. Geology and Soils

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			✓	
i. Rupture of known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?		✓		
ii. Strong seismic ground shaking?		✓		
iii. Seismic-related ground failure, including liquefaction?		✓		
iv. Landslides?		✓		
b. Result in substantial soil erosion or the loss of topsoil?				✓
c. Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		✓		
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code creating substantial risks to life or property?				✓

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.				✓
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- a.i. *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*
- a.ii. *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*
- a.iii. *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*
- a.iv. *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

The City of Fort Bragg is located along the central Mendocino coast, an area that is known for seismic activity. Based on published fault maps, there are no active or potentially active faults known to traverse the City and no documented landslide or liquefaction zones.¹² There are four active or potentially active faults located within a 60 mile radius of the City. These include: the San Andreas Fault approximately six miles offshore of Fort Bragg which is the most likely source of earthshaking; the Maacama Fault zone approximately 21 miles to the east of the City, which has the potential to generate strong shaking in Fort Bragg; the Mendocino Fault zone approximately 60 miles to the northwest, which is an extremely active structure; and the Pacific Star Fault, which is located between the towns of Fort Bragg and Westport and is currently under study. There are no faults known to traverse the project site, and no significant impacts involving the rupture of known earthquake faults.

As the City of Fort Bragg is in an area known for seismic activity, the project could be subject to strong seismic ground shaking. *Geotechnical Investigation Report: Fort Bragg Wastewater Treatment Plant Upgrade Project* includes numerous recommendations for site preparedness, grading, construction slopes and shoring, dewatering, foundation support, below-grade walls, and lateral resistance.¹³ These recommendations are included as **Mitigation Measure GS1**, to reduce the impacts of seismic ground shaking to a less than significant level.

Mitigation Measure GS1: Site work and construction associated with the proposed project shall conform to the recommendations outlined in the HDR *Geotechnical Investigation Report: Fort Bragg Wastewater Treatment Plant Upgrade Project*, which is included as **Attachment #** of this report.

The *Geotechnical Investigation Report* addresses soil liquefaction and its potential impacts on the proposed project. Soil liquefaction is a scenario where saturated, cohesionless soil experiences a temporary loss of strength due to excess pore water pressure during cyclic loading induced by an earthquake (HDR, 10).

The report estimates that groundwater exists within the bedrock under and surrounding the project site, as observed in some test borings performed during the investigation. The report

¹² California Department of Conservation. *Alquist-Priolo Fault Zone and Seismic Hazard Zone Maps*. <http://www.conservation.ca.gov/cgs/rghm/ap>. Accessed March 11, 2016.

¹³ HDR. *Geotechnical Investigation Report*.

judges that the potential for soil liquefaction is low. The report goes on to make recommendations for the foundation of the proposed treatment facility and the blower building, which **Mitigation Measure GS1** encompasses. As for the two proposed pump stations, the report finds that impacts due to liquefaction are negligible at their proposed depths. With the proposed mitigation, impacts would be less than significant.

The *Geotechnical Investigation Report* states that “hazards such as slope instability, lurching, or fault rupture are considered unlikely at this site because of the relatively level terrain, subsurface soil conditions, and distance from a known active fault” (HDR, 10, emphasis added). Compliance with recommended **Mitigation Measure GS1** will ensure impacts would be reduced to a less than significant level.

b. *Would the project result in substantial soil erosion or the loss of topsoil?*

The proposed project site is level with a minimal erosion risk. No top soil will be removed as a result of the project. It is also surrounded by vegetation, reducing the risk of erosion-caused impacts. The project includes a comprehensive stormwater management system, which will result in the retention and treatment of all storm water on site, thus eliminating erosional forces on the site.

c. *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

The *Geotechnical Investigation Report* evaluated potential risks due to soil instability, and determined the proposed mitigation measures would offset any potential impacts. The project’s compliance with the report’s recommendations and recommended **Mitigation Measure GS1** will reduce impacts to a less than significant level.

d. *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?*

The *Geotechnical Investigation Report* characterizes site soils as sands or silty sands (HDR, 10). There are little to no clays present, which are the soil constituents normally associated with expansive soils. Additionally, the City of Fort Bragg’s Coastal General Plan does not identify any expansive soils in this area,¹⁴ consistent with the *Geotechnical Investigation Report* characterization. There would be no environmental impacts resulting from the project due to expansive soils.

e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative water disposal systems where sewers are not available for the disposal of waste water?*

The project is a Wastewater Treatment Plant, and does not include the use of septic tanks or alternative water disposal systems; however, the project’s consistency with recommended **Mitigation Measure GS1** will ensure that any geologic risks are reduced to less than significant levels.

¹⁴ “Geologic Hazards.” *Coastal General Plan*. City of Fort Bragg, 2008. 7-3.

VII. Greenhouse Gas Emissions

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b) *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The City of Fort Bragg adopted a Climate Action Plan in 2012. The plan sets greenhouse gas reduction goals including a thirty-percent reduction in greenhouse gasses for the municipality by 2020, and a seven-percent reduction goal for the community by 2020.

Water and wastewater operations provide the largest contribution of GHG emissions to the City's carbon footprint, accounting for about 515 MTCO₂E of GHG emissions in the baseline year of 2005. This represents approximately 45% of total City generated GHG emissions. More than half (56% or 326 MTCO₂E) of those GHG emissions originate from operations at the WWTP.

GHG emissions associated with the existing WWTP are generated from the following three sources:

1. Propane combustion to heat digesters

The current WWTP requires a propane heat source for the digesters. The proposed system will decommission the digesters, and requires no combustion for operation. The proposed activated sludge system would eliminate this existing source of GHG emissions.

2. Methane emitted by digesters and sludge

The decomposition of the sludge generated by the existing WWTP is the source of 24% of the facility's GHG emissions, primarily from the generation of methane gas. In normal operating conditions, the methane released from the digesters is flared, or ignited, reducing its potential global warming potential. However, on occasion, the flare extinguishes and has to be relit manually. During these times significant amounts of methane, a GHG 23 times more potent than CO₂, is released directly into the atmosphere. The proposed activated sludge system would decommission the digesters and utilize an aerobic process, eliminating this existing source of GHG.

3. Purchased electricity

The existing WWTP emits approximately 326 MTCO₂E of GHG annually, per the City's 2012 Climate Action Plan. The proposed activated sludge plant utilizes updated technologies, reducing its reliance on electricity. As shown in **Figure 6** below, the proposed WWTP would emit approximately 209 MTCO₂E of GHG annually, a reduction of approximately 35% of GHG emitted.

1 kW-hr = 0.0007 Metric Tons CO ₂ E Cooling load 30-40 Btuh/sq-ft Heating load 25-40 Btuh/sq-ft Lighting load 0.001 - 0.002kW/sq-ft PG&E Emission Factor (Power), 201 0.168 MT CO ₂ E/MWh PG&E Emission Factor (gas), 2016 0.00531 MT CO ₂ E/Therm From HVAC Equations, Data and Rules of Thumb Greenhouse Gas Emission Factors: Guidance for PG&E Customers, November, 2015											
Item No.	Description	No. of Units in Service (1)	Flow rate, gpm	Head, ft	Efficiency	HP	kWhr/sq- ft	Average Operating Hours (2)	kWhr/day	kWhr/yr	MTCO ₂ E/yr
INDIRECT EMISSION											
Electricity Consumption											
1	Stormwater Pumps	1	1425	30	73	20		2	30	5,446	
2	Influent Pumps	2	1700	33	71	25		8	298	108,916	
3	Packaged Biological Treatment Facility										
	<i>Aeration Blower</i>	2				75		24	2,686	980,244	
	<i>Belt press dewatering system</i>	1				12		8	72	26,140	
4	Lighting Panel BB	1				10		24	179	65,350	
5	Lighting										
	<i>Chlorination Building</i>	1800					0.0015	8	22	7,884	
	<i>Electrical/Dewatering Building</i>	1680					0.0015	8	20	7,358	
6	Other Plant Processes	1				6.7		24	120	43,800	
	Total								3,426	1,245,138	209.18
BIOGENIC EMISSION											
7	No Cogen or combustion										
Footnotes: (1) Number of units in service under normal operation (2) Average operating hours per day											

Figure 6: GHG Emission Worksheet

4. Hauling of sludge

The existing process requires dried sludge to be hauled to Novato. The updated system would continue this practice, and would not increase GHG emissions based on hauling.

The updated WWTP would eliminate the digesters and reduce electrical demand, while trucking would not increase. As a result, the proposed project would have a net decrease in GHG emissions compared to the existing operation and would not conflict with any applicable climate change plan, policy or regulation.

VIII. Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. <i>Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</i>		✓		
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✓	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			✓	
e. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?			✓	
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?			✓	
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓	
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			✓	

- a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Construction of the proposed WWTP update would involve the use of materials generally regarded as hazardous, including gasoline and other fuels, hydraulic fluids and other similar materials. The risks to the community associated with the routine transport, use, and storage of these materials during construction are anticipated to be relatively small and less than significant. With appropriate handling and disposal practices, there is relatively little potential for an accidental release of hazardous materials during construction. Storage and handling of materials during construction should incorporate Best Management Practices (BMPs), and would be subject to the provisions of a Stormwater Pollution and Prevention Plan (SWPPP). BMPs would include provisions for safely refueling equipment, and spill response and containment procedures. The potential impacts due to routine transport, use, or disposal of hazardous materials during construction activities would be less than significant with the incorporation of **Mitigation Measure HM1**.

Mitigation Measure HM1: The Stormwater Pollution and Prevention Plan (SWPPP) required as a standard condition of approval for the required Coastal Development Permit, shall prescribe hazardous-materials handling procedures for reducing the potential for a spill during construction and shall include an emergency response program to ensure quick and safe cleanup of accidental spills. The plan shall identify areas where refueling and vehicle maintenance activities and storage of hazardous materials, if any, shall be permitted.

The WWTP would continue to use sodium hypochlorite, sodium bisulfite and alum (aluminum sulfate) as part of the treatment process, which are classified hazardous substances.¹⁵ Small amounts of fuels and other similar materials may also be used and stored on site. Access to chemicals would continue to be controlled to ensure safety. To ensure environmental impacts due to potential hazards would remain less than significant and operation of the facility would not subject the public, including sensitive receptors, to undue risks due to exposure of hazardous materials, **Mitigation Measure HM2** is recommended, requiring preparation and implementation of a Hazardous Materials Management Plan.

Mitigation Measure HM2: Emergency spill supplies and equipment shall be kept adjacent to all areas of work and in staging areas, and shall be clearly marked. Detailed information for responding to accidental spills and for handling any resulting hazardous materials shall be provided in the project's Hazardous Materials Management Plan, as required by the Mendocino County Department of Environmental Health.

The treatment process would also use sodium bicarbonate, citric acid and a carbon compound called MicroC, but these materials are not considered to be hazardous substances according to the California Occupational Safety and Health Regulations. These chemicals are standard for use in modern wastewater treatment processes, and will be handled by experienced plant operations staff. Mishandling by unauthorized individuals is not expected given that the treatment plant site is fenced with secure access gates operable only by plant staff. The proposed WWTP update proposes no changes to the existing security operations of the facility. The storage of these chemicals would continue to be in closed containers within areas that are further secured by fencing and building enclosures.

¹⁵ California Occupational Safety and Health Regulations (CAL/OSHA) Chapter 3.2, Subchapter 1. Regulations of the Director of Industrial Relations, Article 5. Hazardous Substances Information and Training, Section 339.

- b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

The existing hypochlorite tanks have built-in secondary containment which is double-walled with leak detection systems. The WWTP also includes existing concrete containment surrounding the hypochlorite tanks. The existing sodium bisulfite tank is single-walled surrounded by an existing concrete containment area. The proposed WWTP update would not alter the existing measures for mitigating public hazards due to the release of hazardous materials into the environment, reducing impacts to a less than significant level.

- c) *Would the project omit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

The project site is not located within one-quarter mile of any existing or proposed school, and no impacts are anticipated.

- d) *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

The State Water Resources Control Board (SWRCB) has not identified hazardous materials sites on the project parcel.¹⁶ The nearest data points shown on the SWRCB website are field monitoring points associated with the adjacent former Mill Site. No construction or development activities are proposed beyond the boundaries of the WWTP property where data points are present, and no impacts are anticipated.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport, would the project result in a safety hazard for people residing or working in the project area?*

The project is not located within an airport land use plan or within two miles of a public airport.

- f) *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

There are no private airstrips in the project vicinity. There is an abandoned air strip immediately to the south of the site, but this strip is clearly marked with large yellow Xs to indicate its abandoned nature. There is a private airstrip located approximately 2.5 miles to the northeast, and a private helipad located approximately 0.9 miles southeast of the project parcel. The project proposes the construction of a limited number of structures not exceeding thirteen feet in height within the footprint of the existing WWTP. The project would have no impact on nearby private airstrips.

- g) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project as proposed would not block any evacuation paths. The existing evacuation and emergency plans in place at the WWTP would remain in effect, and the proposed WWTP update would have no impact on the existing plans.

¹⁶ State Water Resources Control Board. 2016, February 17. GeoTracker. <http://geotracker.swrcb.ca.gov>.

- h) *Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

All project construction and operation of the proposed WWTP update would be in compliance with the goals and policies of the City's Coastal General Plan Safety Element. All construction would be subject to approval of a building permit, which will ensure compliance with California's Wildland-Urban Interface code. Compliance with the Coastal General Plan Safety Element and the California Wildland-Urban Interface code would reduce impacts to a less than significant level.

IX. Hydrology and Water Quality

<i>Would the project</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?			✓	
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table (e.g. the production rate of a pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			✓	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				✓
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				✓
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				✓
f. Otherwise substantially degrade water quality?			✓	
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				✓
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				✓

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				✓
j. Inundation by seiche, tsunami, or mudflow?			✓	

a. *Would the project violate any water quality standards or waste discharge requirements?*

Proposed construction activities include excavation and grading that would result in exposure of soil to runoff. If not managed properly, the runoff could cause increased sedimentation resulting in the blockage of water flows, potentially increasing localized ponding or flooding.

Chemical release potential is present at most construction sites. Once released, substances such as fuels, oils, paints and solvents could be transported to nearby surface waterways or into the sea.

The project would require a Coastal Development Permit and building permits prior to initiation. These permits require the development of a Stormwater Pollution Prevention Plan (SWPPP), which would cover runoff from the construction. The preparation and implementation of a SWPPP, as required by **Mitigation measure WQ1**, would ensure that impacts to water quality are less than significant.

Mitigation Measure WQ1: The City shall prepare a project Stormwater Pollution Prevention Plan (SWPPP) to include the application of BMPs minimizing the discharge of pollutants during construction. The City of Fort Bragg shall prepare a SWPPP before approving a grading permit for the site.

Continued operation and maintenance of the WWTP, post project, will result in improvements to stormwater water quality. Post construction, all stormwater runoff within the WWTP will either be infiltrated on site, or captured and conveyed to the headworks of the WWTP for treatment. The proposed project would be consistent with existing water quality standards and waste discharge requirements.

b. *Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table (e.g. the production rate of a pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?*

The proposed update to the WWTP would not require an increase in water usage beyond that of the existing operation, and would not substantially affect groundwater supplies. There would be no significant impacts to nearby wells or the surrounding groundwater table.

c. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?*

d. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase*

the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

- e. *Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*
- f. *Would the project otherwise substantially degrade water quality?*

The project would not alter the course of a stream, river or erosional forces on site, nor would the project result in flooding on or off site. The project would improve stormwater infiltration and treatment as a result of **Mitigation Measure WQ1**.

- g. *Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*

The proposed project does not include a housing component, and will have no impacts on housing within flood areas.¹⁷

- h. *Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?*

The proposed project does not place any structures within a FEMA 100-year flood hazard area, and will have no impacts to flood flows.

- i. *Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?*

The proposed project will not affect any levee or dam, and will have no impacts on people or structures due to flooding.

- j. *Would the project expose people or structures to a significant risk or loss, injury or death involving inundation by seiche, tsunami, or mudflow?*

The proposed project is not located within a mapped tsunami hazard area, and will have no impacts due to inundation by seiche, tsunami or mudflow. The proposed project is located on a blufftop at an elevation of approximately 60 feet. In a severe earthquake (magnitude 8.0 or higher), a wave of this scale could be formed from the San Andreas Fault; however; the proposed facility improvements are at no more risk from tsunami inundation than the existing WWTF. The risk is less than significant.

¹⁷ Federal Emergency Management Association. *Flood Insurance Rate Map*. No. 06045C1010F. 2011.

X. Land Use and Planning

<i>Would the project</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Physically divide an established community?				✓
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				✓
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				✓

a) *Would the project physically divide an established community?*

The proposed project is located at the western edge of the City of Fort Bragg on a coastal bluff. The approximately 5.8 acre parcel is owned by the City of Fort Bragg. The project parcel is fronted on the east by the former Georgia-Pacific Mill Site, an approximately 319-acre undeveloped oceanfront property that is currently undergoing environmental remediation. The City of Fort Bragg's Coastal Trail traverses 82-acres extending along the coastline both north and south of the project. The project parcel is presently developed with an existing Wastewater Treatment Plant. The update would take place within the parcel boundaries of the existing development. The project would not divide an established community.

b) *Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

The following goals and policies of the Coastal General Plan apply to the proposed WWTP update:

Goal PF-2 Assure that the City's infrastructure is maintained and expanded to meet the needs of the City's residents and growing population.

Policy PF-2.5 Wastewater Capacity: Review wastewater capacity and expansion plans as needed when regulations change and as the treatment and disposal facility near capacity. In addition to providing capacity for potential build-out under the City General Plan outside the coastal zone, any expansion of capacity of wastewater facilities shall be

designed to serve no more than the maximum level of development in the coastal zone allowed by the certified LCP that is consistent with all other policies of the LCP and Coastal General Plan. The City shall identify and implement wastewater system improvements or changes in service area that are designed to ensure adequate service capacity to accommodate existing, authorized, and probable future priority uses.

Program PF-2.5.2 Continue to improve the wastewater treatment and disposal facility to comply with changing State requirements.

Policy PF-2.7 Public Buildings: Ensure that public buildings in the City are adequate to provide services for the community.

The proposed project would update the existing Wastewater Treatment Plant to meet the City's ongoing needs and comply with applicable standards. No goals, policies or programs were identified that would conflict with the proposed project. The project is consistent with General Plan goals, policies and programs, specifically those relating to the continued maintenance and operation of the existing WWTP.

The project site is located within the Public Facility (PF) zoning district. According to the Coastal Land Use and Development Code (CLUDC), the project is consistent with the definition of a Utility Facility, and is principally permitted in the PF zoning district. Since the property currently contains an existing Wastewater Treatment Plant, the use is established. The project proposes to update the existing use. The project is subject to the applicable development standards outlined in Article 3 of the CLUDC, including parking, fencing, screening, and performance standards. The project is also subject to grading permit requirements and procedures outlined in Chapter 17.60 of the CLUDC. The project is subject to Design Review requirements because the new facilities would be visible from public view areas.

Site Development Regulations, including grading permit requirements and procedures, grading, erosion, and sediment control standards, and urban runoff pollution control, as outlined in Article 6 of the CLUDC, are addressed in Section VI, Geology and Soils, and Section IX, Hydrology and Water Quality, of this report.

Finally, the project requires a Coastal Development Permit. In order to obtain a Coastal Development Permit, the project must be found in compliance with the findings for approval outlined in Section 17.71.045(1)(2), including that "the proposed development...is in conformity with the City of Fort Bragg's certified Local Coastal Program..." and that "the proposed development is in conformance with the City of Fort Bragg's Coastal General Plan."

In order to obtain the necessary permits (Coastal Development Permit, Design Review, etc.), the project will have to be found in compliance with all local ordinances, policies and plans, and would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project.

c) *Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?*

There are no habitat conservation plans or natural community conservation plans associated with this property or habitats or communities located on this property. The project would not conflict with any habitat conservation plans or natural community conservation plans.

XI. Mineral Resources

<i>Would the project</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓

- a. *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- b. *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

The site does not contain any known mineral resources and construction of the project would not result in the loss of any locally important mineral resources delineated in the Fort Bragg Coastal General Plan or any other land use document.

XII. Noise

<i>Would the project</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✓	
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			✓	
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			✓	
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			✓	
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			✓	
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?			✓	

- a) *Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies?*
- b) *Would the project result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?*
- c) *Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*
- d) *Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*
- e) *For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

- f) *For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

The proposed WWTP update will not increase operational sound levels beyond existing conditions. The existing WWTP operates within the requirements of the City's noise standards prescribed in the General Plan and Coastal Land Use and Development Code. Any environmental impacts due to noise produced by the facility would be equal to the existing conditions, remain consistent with applicable noise policies and regulations, and would remain at a less than significant level.

XIII. Population and Housing

<i>Would the project</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✓
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				✓
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				✓

a) *Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The proposed project would not significantly upgrade the existing capacity of the WWTP. The average daily flow through the existing plant is approximately 600,000 gallons per day, which is not expected to change following completion of the WWTP update. The project's design modernizes an aging system to safely and reliably serve the existing community, and would not directly or indirectly induce substantial population growth in the area.

b) *Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

c) *Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

The project area is presently developed with an existing Wastewater Treatment Plant, and the proposed WWTP update will not displace any existing housing.

XIV. Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Fire protection?				✓
b. Police protection?				✓
c. Schools?				✓
d. Parks?				✓
e. Other public facilities?				✓

The proposed project would have no impact on public services, including fire and police protection, schools, parks or other public facilities. The proposed update does not change the existing use—that of a Wastewater Treatment Plant. No new impacts to public services will result from the update of the existing facility.

XV. Recreation

<i>Would the project</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✓
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓

- a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

The WWTP update would not be open for public use as a recreational facility, and public access would remain restricted for safety and security purposes. The project would not result in an increase in use of existing parks or other recreational facilities, and would continue to operate without impact to the Fort Bragg Coastal Trail. Additionally, the upgrade will reduce odors from the WWTF, which will considerably improve the user experience of the Noyo Headlands Park during the hotter months of the year.

XVI. Transportation/Traffic

<i>Would the project</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections?)				✓
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?				✓
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				✓
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✓
e. Result in inadequate emergency access?				✓
f. Result in inadequate parking capacity?				✓
g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				✓

a) *Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections?)*

The proposed project would not alter the existing public facility use on the property—a Wastewater Treatment Plant. The update to the facility would not result in any substantial

increase in relation to the existing traffic load capacity of the street system. Presently, employees and operators regularly access the existing WWTP, which would continue unchanged following the proposed update. No impacts are anticipated.

b) Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

The WWTP is not and would not be open to the public and would only be accessed on by City staff for regular operation, consistent with the traffic produced by the existing facility. Public access is restricted by locked gates. The project would not result in an increase in traffic.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The project does not include any components that would impact air traffic patterns.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The updated WWTP will be surrounded by the existing six-foot tall chain link fence for safety and security, and will be adequately separated from the public to prevent the possibility of any design feature interfering with traffic or causing traffic hazards.

e) Would the project result in inadequate emergency access?

The project will not alter the existing conditions for emergency access. Presently, access to the WWTP is via two secure gates. Access codes for the gates are provided to emergency responders for emergency access. There will be no changes to emergency access, and no new impacts are anticipated.

f) Would the project result in inadequate parking capacity?

There is currently no formal parking at the existing WWTP. The WWTP is accessed by City personnel as needed for regular operation, which would remain the case following completion of the proposed update project. The CLUDC does not include parking requirements for public facility uses. No parking spaces or loading spaces are proposed as none are warranted.

g) Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

The project does not warrant consideration of alternative transportation systems because the site would not be open to the public, and will be visited only by City staff for regular operation.

XVII. Utilities and Service Systems

<i>Would the project</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				✓
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				✓
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				✓
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				✓
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				✓
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				✓
g. Comply with federal, state, and local statutes and regulations related to solid waste?				✓

- a) *Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*
- b) *Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

The project is an update to the existing WWTP and will therefore comply with the wastewater treatment requirements of the Regional Water Quality Control Board, and by proper permitting and compliance with CEQA, would not cause significant environmental impacts.

- c) *Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

The project would not result in a significant increase of impervious surfaces, and will not necessitate expansion or construction of new stormwater drainage facilities. The amount of impervious surface at the project site would not significantly increase. All stormwater from the property would be rerouted to the headworks and treated on-site. No impacts are anticipated.

- d) *Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

The proposed WWTP update would not require an increase in water usage beyond existing conditions. The project design utilizes reclaimed on-site water, which could decrease the overall water usage at the project site. The project would have no impact on water supplies.

- e) *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

The project would not result in any increase in demand on wastewater treatment facilities.

- f) *Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

The project would not create or contribute to an increase in solid waste. Existing solid waste produced at the facility is delivered to Redwood Landfill in Novato, which is operated by Waste Management. The proposed project would not alter the existing disposal of solid wastes, and would have no new impact on solid waste capacities.

- g) *Would the project comply with federal, state, and local statutes and regulations related to solid waste?*

The project would comply with federal, state and local statutes and regulations related to solid waste. No increases to solid waste would result in the update to the WWTP.

XVIII. Mandatory Findings of Significance

<i>Would the project</i>	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			✓	
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				✓
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			✓	

With incorporation of the following mitigation measures into the project, all potential impacts would be reduced to a level of less than significant:

Mitigation Measure BR1: The project biologist shall conduct additional surveys at least 100 feet from proposed development when Blasdale's bent grass and coastal bluff scrub is identifiable. If either Blasdale's bent grass or coastal bluff scrub are identified within 100 feet of proposed development, the City shall complete habitat restoration, per a habitat restoration plan prepared by the project biologist for the removal of non-native, invasive iceplant, and transplanting of any rare plants into restored bluff habitat. Removal of iceplant and/or reseeding of rare plants, as prescribed by the project biologist and outlined in a habitat restoration plan, shall be complete to the satisfaction of the biologist prior to final inspection of the Wastewater Treatment Plant.

Mitigation Measure BR2: A biologist shall perform preconstruction surveys for the Ten Mile shoulderband snail and nesting birds, spanning an area at least 100

feet beyond the limits of proposed development. If shoulderband snail or nesting birds are determined to be present, construction shall be stopped until such time that the project biologist in partnership with the California Department of Fish and Wildlife determine appropriate mitigation to eliminate or limit project impacts to the special-status species to a less than significant level.

Mitigation Measure BR3: A Coastal Development Permit shall be approved prior to the initiation of development to ensure that the project would not conflict with any local policies or ordinances protecting biological resources.

Mitigation Measure GS1: Site work and construction associated with the proposed project shall conform to the recommendations outlined in the HDR *Geotechnical Investigation Report: Fort Bragg Wastewater Treatment Plant Upgrade Project*, which is included as **Attachment #** of this report.

Mitigation Measure HM1: The Stormwater Pollution and Prevention Plan (SWPPP) required as a standard condition of approval for the required Coastal Development Permit, shall prescribe hazardous-materials handling procedures for reducing the potential for a spill during construction and shall include an emergency response program to ensure quick and safe cleanup of accidental spills. The plan shall identify areas where refueling and vehicle maintenance activities and storage of hazardous materials, if any, shall be permitted.

Mitigation Measure HM2: Emergency spill supplies and equipment shall be kept adjacent to all areas of work and in staging areas, and shall be clearly marked. Detailed information for responding to accidental spills and for handling any resulting hazardous materials shall be provided in the project's Hazardous Materials Management Plan, as required by the Mendocino County Department of Environmental Health.

Mitigation Measure WQ1: The City shall prepare a project Stormwater Pollution Prevention Plan (SWPPP) to include the application of BMPs minimizing the discharge of pollutants during construction. The City of Fort Bragg shall prepare a SWPPP before approving a grading permit for the site.