NOTICE OF EXEMPTION

To: Office of Planning and Research

P.O. Box 3044, Room 113 Sacramento, CA 95812-3044

Fax (916) 323-3018

From: Lewiston Elementary School District

685 Lewiston Road Lewiston, CA 96052

Project Title: Draft Title – Lewiston ESD Sewer Line and System Replacement

Project Location - Specific: The project site is accessed from Lewiston Road. The approximate latitude and longitude are 40.70011 and -122.8133, respectively.

Project Location - City:

Lewiston, CA

Project Location - County: Trinity County

Description of Nature, Purpose, and Beneficiaries of Project:

Please refer to the attached Exhibit "A"

Name of Public Agency Approving Project: Lewiston Elementary School District

Name of Person or Agency Carrying Out Project: Lewiston Elementary School District

Exempt Status:

15269 (b) - Emergency repairs to publicly or privately owned service facilities necessary to maintain service essential to the public health, safety or welfare.

15282 (k) - The installation of new pipeline or maintenance, repair, restoration, removal or demolition of an existing pipeline as set forth in Section 21080.21 of the Public Resources Code, as long as the project does not exceed one mile in length.

15282(m) - Minor alterations to utilities made for the purposes of complying with Sections 116410 and 116415 of the Health and Safety Code as set forth in Section 21080.26 of the Public Resources Code.

Reasons why project is exempt:

Please refer to the attached Exhibit "A"

Lead Agency Contact Person: Mike McMaster, LESD Board Chair

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Governor's Office of Planning & Research

Date:

SEP 27 2019

STATE CLEARINGHOUSE

EXHIBIT "A" LEWISTON ELEMENTARY SCHOOL DISTRICT SEWER REPLACEMENT PROJECT

PROJECT DESCRIPTION

Lewiston Elementary School (LES) currently has 64 students and 10 staff members on site on any given school day. Special events can add up to 140 people on campus using the facilities. The LES sewer system was installed circa 1956 along with construction of the Trinity and Lewiston Dams.

The LES sewer lateral has a history of root intrusion backing up sewage into the restrooms. During the Fall 2018 Semester there was an event that resulted in the installation of portable toilets while steps were taken to remove the blockage. Initial sewer inspection of the lateral using CCTV gave Lewiston Community Services District (LCSD) operators concern that the concrete lateral would not withstand high pressure jetting to remove the blockage - See CCTV 1 and 2. Eventually Weaverville Sanitary District used root cutters to clear the blockage. During the large storm events in the Spring 2019 Semester, backup appeared outside in the basketball court area.

Pipe installed after 1945 are assumed to last an average of 75 years. In estimating when the pipes will be replaced, the EPA assumed that the actual life span of the pipe will be distributed normally around its expected average life; that is, pipe expected to last 75 years will last 50 to 100 years. Given the 60+ year age of the sewer lateral and history of blockages, it is anticipated that the lateral will soon be blocked again, placing students and staff in an unacceptable position of sewage flooding the school. Therefore, it is recommended that the sewer lateral be replaced. The Lewiston Community Service District has made a similar decision within the Lewiston housing subdivision (also circa 1956), where CCTV found upwards of 70% of the laterals to have root intrusion caused largely by the concrete pipe materials with 4-foot-long, non-gasketed joints.

The following are the major Project components as shown in Figure 1:

- Horizontal Directional Drilling (HDD) will be implemented to minimize surface
 disturbance to replace the existing sewer lines and connect them with both the school
 facility and the Lewiston Community Service District sewer system. This method will
 utilize entry and exit pits while a horizontal hole is drilled, reamed, and then the new
 pipe, which is typically HDPE or fused PVC, is pulled into place. Open cut trenching is
 required for each connection and at the manholes.
- Figure 1 illustrates a preliminary design layout of the sewer lateral. Note that this design is based on aerial photogrammetry, which should be confirmed by field survey prior to the final design. It is also noted that critical design constraints include the tie-in manhole on Fremont Street, which is set at a critical grade to flow to the LCSD Wastewater Treatment Plant. Finally, the preliminary design is based on a minimum 1.5% slope between the school and Fremont Street, which is relatively flat and requires construction observation of the HDD contractor's activities on-site.

LOCATION

The Project site is located at Lewiston Elementary School's campus at 685 Lewiston Road, Lewiston, CA 96052. The project site is accessed from Lewiston Road. The approximate latitude and longitude are 40.70011 and -122.8133, respectively.

The Project also ties into the Lewiston Community Services District sewer line on Freemont Street.

REASONS FOR PROJECT EXEMPTION

CEQA allows certain government actions to proceed without further CEQA review if that type of action has been previously determined not to have a significant impact on the environment. Actions defined in a Categorical Exemption may be subject to further environmental review in the case of extraordinary circumstances under exemptions under CEQA. (14 CCR § 15061(b); 14 CCR § 15300.2.)

CEQA Guidelines Section 15300 identifies that Section 21084 of the State of California Public Resources Code requires that the CEQA Guidelines "include a list of classes of projects which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from the provisions of CEQA. "

In response to that mandate, the Secretary for Resources has found that various classes of projects "do not have a significant effect on the environment and therefore are declared to be categorically exempt from the requirement for the preparation of environmental documents." In addition, through the use of horizontal directional drilling, the project has by design eliminated potential impacts to the natural area between the school and Fremont Street.

Review of the 32 classes has led to a determination that the proposed Project would be categorically exempt under three classes – Emergency Repairs, Replacement or Reconstruction, and Minor Alterations to Utilities. For each class, discussion of applicable "examples" sited in the CEQA Guidelines is provided explaining why the proposed project is Categorically Exempt under CEQA.

15269. Emergency Repairs

15269(b) states that an exemption may be granted due to "Emergency repairs to publicly or privately owned service facilities necessary to maintain service essential to the public health, safety or welfare."

The proposed project will remedy a situation that the Trinity County Department of Environmental Health has classified as essential public health, safety and welfare, including the following statement:

"The current conditions of the Lewiston Elementary school building drains and lateral sewer connections are an imminent health and safety issue for all students and employees on campus, and if not remedied immediately, Trinity County Environmental Health will be forced to close the effected facilities, leaving the school without cafeteria, playground, and bathroom options."

15282. Replacement or Reconstruction

15282 (k) states that an exemption may be granted in the case of "The installation of new pipeline or maintenance, repair, restoration, removal or demolition of an existing pipeline as set forth in Section 21080.21 of the Public Resources Code, as long as the project does not exceed one mile in length."

The proposed project will almost exclusively consist of the installation of new pipeline and/or maintenance, repair, restoration, removal or demolition of an existing sewer pipeline servicing Lewiston Elementary School to ensure services to meet the capacity at or just above the existing use.

15282. Minor Alterations to Utilities

15282(m) states that an exemption may be granted for "Minor alterations to utilities made for the purposes of complying with Sections 116410 and 116415 of the Health and Safety Code as set forth in Section 21080.26 of the Public Resources Code."

Minor alterations to the Lewiston Community Services District access will needed to integrate the new sewer laterals with the LCSD's facilities.



