

INITIAL STUDY AND
DRAFT MITIGATED NEGATIVE DECLARATION



CITY OF FERNDALE
Citywide Sewer Replacement

DRAFT
March 2021

Lead Agency:
City of Ferndale
834 Main St
P.O. Box 1095
Ferndale, CA 95536

Prepared by:

PLANWEST
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1.0 Project Information

PROJECT TITLE: City of Ferndale Citywide Sewer Replacement

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PROJECT LOCATION: Ferndale, Humboldt County, CA

ASSESSOR'S PARCEL NUMBER: Various

GENERAL PLAN & ZONING DESIGNATION: Various

PROJECT DESCRIPTION:

Introduction

The City of Ferndale operates a wastewater treatment plant (WWTP) and collection system in Ferndale, California (Figure 1). The system is publicly owned and is designed to treat domestic sewage from approximately 571 residential connections and 89 business connections located in the City and some surrounding, unincorporated areas in the vicinity of the City. The WWTP is regulated by the Waste Discharge Requirements and Water Recycling Requirements set forth in the North Coast Regional Water Quality Control Board (NCRWQCB) Order No. R1-2018-0046 and National Pollutant Discharge Elimination System (NPDES) No. CA0022721 (referred to herein as Order No. R1-2018-0046).

The WWTP is designed to treat up to approximately 0.95 million gallons per day (MGD) (peak average daily wet weather design flow). During rain events when the flow exceeds the design capacity, up to 5.0 MGD is sent to an equalization basin for later treatment. The equalization basin is a retention pond used for influent storage during wet weather storm events or during emergencies. This allows the facility to manage flow up to 6.0 MGD.

The collection system experiences a considerable amount of inflow and infiltration (I&I). Due to the I&I, the inflows to the WWTP exceed the treatment capacity during storm events. The excess influent water is pumped to a retention pond located just north of the WWTP. The City conducted a system wide study to determine which sections of the sewer collection system are contributing the greatest amount of I&I. The City proposes to replace portions of the collection system to reduce I&I based on the study recommendations.

Project Overview

Sewer lines in the City of Ferndale vary greatly in age, construction, and condition. This has led to an increase of inflow and infiltration in the system that frequently exceeds the capacity of the WWTP. In an

effort to reduce I&I and create a more efficient system, the City is proposing a series of sewer line replacements. These replacements, as shown in Figure 2, will take place in phases as funding becomes available.

Proposed Construction Methods

Typical sewer line replacement will involve excavation of the existing pipeline in existing street right of ways and utility easements, installation of new plastic pipeline (PVC, polyethylene, or other plastic material), backfill, and patching of disturbed street areas. When construction is taking place in street ways, traffic control will be necessary to route vehicles around the area of construction as controlled one-way travel. It is not anticipated that construction activities will require full street closures or detours.

Much of the City has a high groundwater table and depending on what time of year construction occurs, groundwater may be present at construction sites. Shoring may be required to prevent the trench from collapsing, and pumping may be required to remove water from the trench. Any groundwater pumped from the trench will be diverted into the collection system downstream of the construction area in order to reduce any potential groundwater contamination.

One of the sections scheduled for replacement is Main Street (State Highway 211) from Van Ness Avenue to Ocean Avenue. This portion of the system dates from the 1920's and the exact location of the pipeline and connecting laterals is not known. Typically, ground penetrating radar would be used to locate pipelines. However, preliminary investigations with radar technology were inconclusive due to the clay soil in the area. As such, a pipe locator will be used along with potholing in key locations to determine where pipelines exist. A new sewer line will be installed in the same location as the existing system with the old line being removed completely and disposed of. New cleanouts will be installed in sidewalk areas to ensure ease of access to service laterals.

After installation of the new sewer line along Main Street, the street will be repaved. The California Department of Transportation (Caltrans) may require the street to be completely replaced as there is an existing cement base under the street asphalt. Complete replacement of the roadway will involve removal and disposal of the existing roadway materials, minor grading, installation of new cement base, and pavement with asphalt. The project will also include construction of new manholes and cleanouts for purposes of maintenance and inspection of newly installed lines. Construction of these features will also take place within existing road right of ways and easements.

Construction activities would occur primarily during the hours of 7:00 a.m. to 5:00 p.m. although longer work hours may be necessary during sewer tie in events. Limited sewer service interruptions may occur in some locations during construction. The City would provide advanced notice to the adjacent customers of any planned sewer service interruptions, night-time, or weekend construction activity that is necessary. Anticipated construction equipment for project activities include: excavator, loader, backhoe, service trucks, generator, shovels, and misc. hand tools.

Best Management Practices

Standard Best Management Practices (BMPs) for construction will be implemented as needed. Standard erosion control BMPs will be employed during and after construction. These BMPs include water conservation practices, paving and grinding operations, storm drain inlet protection, bio-filter bags as found necessary, stabilized construction entrance, solid waste management, and sanitary/septic waste management. All concrete activities will be conducted in a manner to avoid impacts to water quality

including designating fully-contained concrete washout areas at least 100 feet from a receiving water and appropriately dispose of or treat concrete effluent from the construction activities.

Regional Setting

The City of Ferndale is located on the north coast of California in Humboldt County at latitude 40.578654 and longitude -124.261656 which is approximately 230 miles north of San Francisco, California and 140 miles southwest of Medford, Oregon. The City is situated on the southern edge of the Eel River flood plain approximately 4 miles from the Pacific Coastline and 15 miles from Eureka, California (Figure 1). Primary access to the City is by CA-211 from Fernbridge along Highway 101 approximately 4 miles to the northeast. Additional access roads include Grizzly Bluff Road to the east, Mattole Road to the south, and Centerville Road to the west. The surrounding area is primarily agricultural exclusive or agricultural grazing land with flat lowlands around the City to the north and hills adjacent to the City in the south.

Local Setting

The City of Ferndale was settled in 1852 by a small group of settlers that crossed the Eel River and traveled up Francis Creek to the base of the surrounding hills. The City was officially incorporated on August 23, 1893 and covers approximately one square mile of land. Services provided by the City include wastewater, stormwater drainage, law enforcement, streets and street maintenance, and parks and recreation. This small community has traditionally had an agricultural-based economy that has expanded to also include a very successful tourist economy. Specifically, the main industries in Ferndale are dairy farming, cattle ranching, tourism, lumber and wood products, and service.

The City of Ferndale is known as the “Victorian Village” for its classic Victorian-era architecture and its historic main street. The city is also the location of the Humboldt County Fairgrounds that hosts an annual fair and many other events. The City of Ferndale was designated as a State Historic Landmark (No. 883) in 1975 by the California State Parks Office of Historic Preservation. In addition, Ferndale's Main Street Historic District was established in 1994 by the National Park Service and placed on the National Register of Historic Places.

The sanitary sewer system originally consisted of vitrified clay pipe and laterals flowing north towards the treatment facility located along Francis Creek at its confluence with the Salt River; just north of the City boundary. The wastewater treatment facility was expanded in 2011 with a design capacity of 1.0 million gallons per day with a 1:1 dilution ratio at its discharge location in Francis Creek. However, due to the aging pipes and the high level of Infiltration/Inflow in the system, wet weather flows can exceed the capacity of the treatment system and excess wastewater must be temporarily stored in the City's retention pond located adjacent to the treatment facility. As such, the City is seeking to replace aging sanitary sewer lines in an effort to reduce I&I and improve services for City residents.

Regulatory Setting & Approvals Required

City CEQA review and project approval would be required before commencement of project activities. Wastewater collection and treatment systems are overseen by the North Coast Regional Water Quality Control Board (NCRWQCB). A Caltrans Encroachment Permit will be required for construction activities along Main Street (Highway 211). Project activities outside the City Boundary may require a Coastal Development Permit (i.e. Improvement Area 1: B1-B2 as shown on Figure 2).

Figure 1. Regional Setting

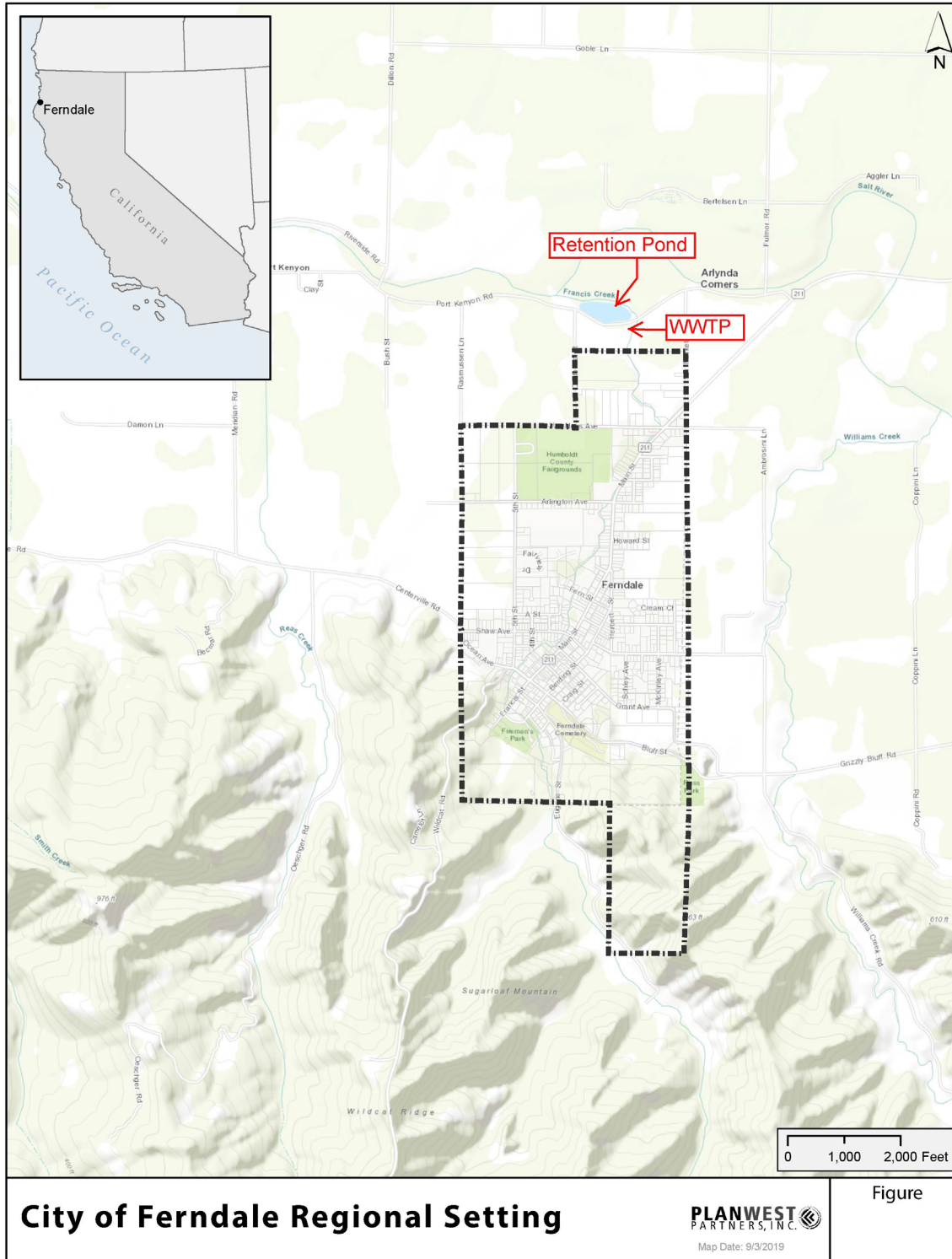
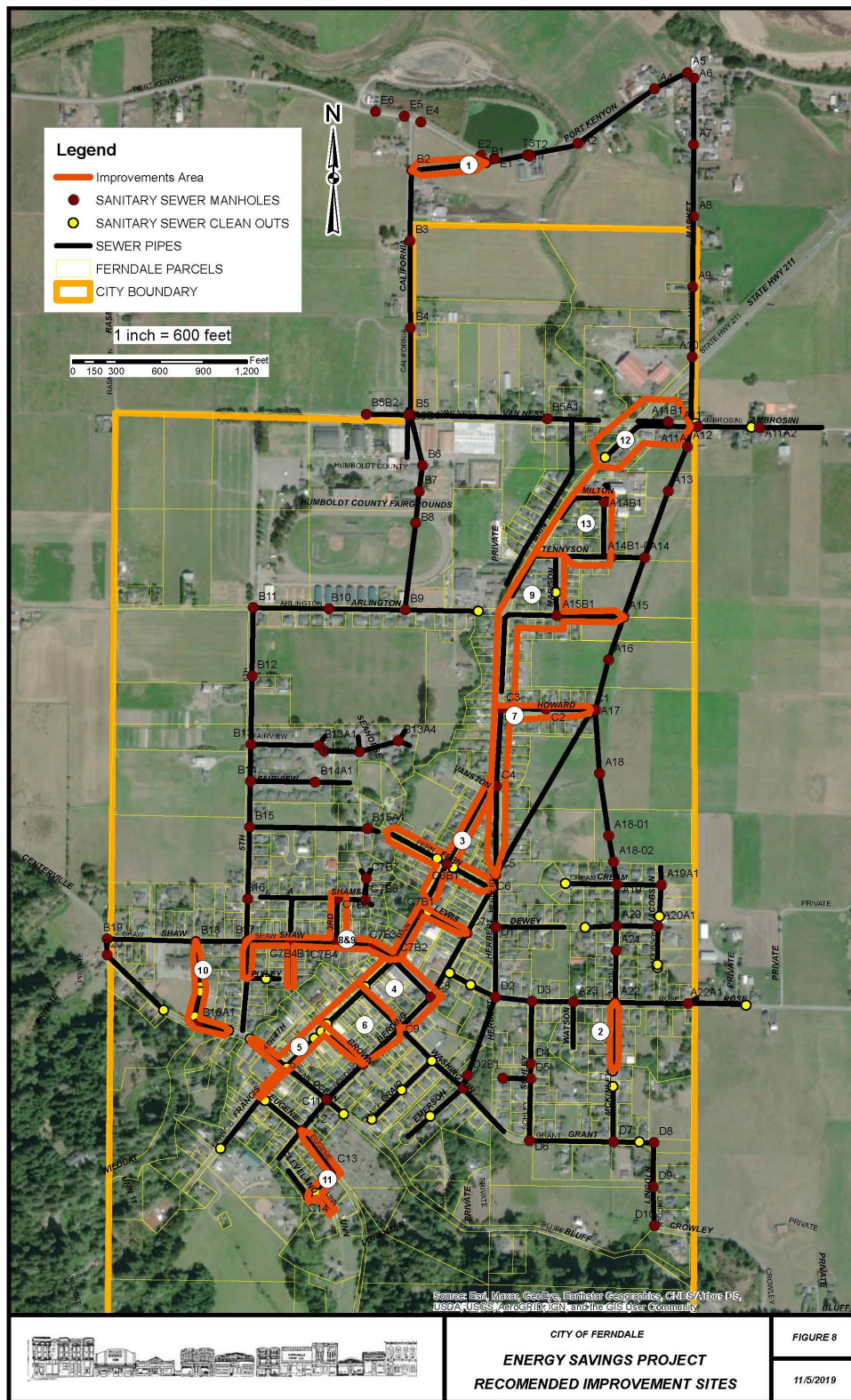


Figure 2: Ferndale Planned Sewer Line Improvements



2.0 Statement of Findings and Determination

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

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.



Signature

Vanessa Blodgett

Printed Name

March 18, 2021

Date

City of Ferndale, Contract Planner

For

3.0 Environmental Impacts Evaluation and Checklist

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The analysis of each issue should identify:
 - a) the significance criteria or threshold used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

AESTHETICS	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from a publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Setting

The City of Ferndale was settled in 1852 and was incorporated as a city in 1893. The City is known for its historic Victorian architecture and several locations, including Main Street, are designated as historical places. The surrounding area is characterized by flat agricultural lands often used for grazing. These lands continue throughout the Eel River Valley creating vast open vistas. To the south of the City is hilly terrain that is characterized by ridge and valley landscapes.

Ferndale's Design Review Committee oversees development proposals within the City. The utilization of the City's Zoning Ordinance and the issuance of Design Review Permits ensure that commercial and residential development meet basic design criteria. Design review procedures are intended to promote orderly and harmonious development in the City, including the protection and enhancement of its visual resources.

Discussion

- a) The City's topography is generally flat except for small portions adjacent to the hill areas to the south such as those around Firemen's Park. General vistas from roadways not in the City center are of flat rural lands primarily made up of crop fields and grazing pastures. The Project does not propose any new development or expansion of services that would promote development. Scenic vistas directly adjacent to roadways where construction is taking place may be temporarily impacted but will be returned to their original state once construction is completed. As such, any impacts to scenic vistas from implementation of the Project would be **less than significant**.
- b, c) Sanitary sewer replacement throughout the City will take place in existing roadways and rights-of-way. Along historic main street work will be required in sidewalk areas for installation of cleanouts. Construction will be limited to streets and sidewalks and will not impact historic buildings. However, in the event minor alterations are needed to accommodate cleanouts, all construction dealing with historical buildings must take place pursuant to the City's Adopted California Historical

Building Code as outlined in the City of Ferndale's Building Inspector and Construction Code Ordinance. This will ensure that the historic visual character of the City is maintained and that any alterations would be in keeping with the City's historic aesthetic. Additionally, there are no designated scenic highways in or near the City. As such, it is anticipated that there will be no impacts to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings and any impacts to the existing visual character will be **less than significant**.

- d) Construction activities will primarily take place during daylight hours. There could be temporary source of light and glare from construction equipment. However, this source of light will be removed after construction activities are completed and the sites restored to their original state. Therefore, any impacts to day or nighttime views would be considered **less than significant**.

AGRICULTURE AND FOREST RESOURCES	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
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?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X	
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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 or conversion of forestland to non-forest use?				X

Setting

Although Humboldt County land is not mapped by the California Department of Conservation Farmland Mapping and Monitoring Program, the City is surrounded by and includes lands used and designated for agricultural purposes. The Lower Eel River Basin is an agricultural area where some properties are under Williamson Act contracts and most parcels outside the City boundary are zoned Agriculture-Exclusive. Soils in the basin are generally highly productive agricultural soils. Applicable City and County General Plan policies protect these agricultural lands from conversion to non-agricultural uses. Agricultural

zoned land also exists within the City boundary. Those areas designated agricultural land have limitations on building pursuant to §15.16 of the City Municipal Code.

a, b) Humboldt County is not mapped as part of the Farmland Mapping and Monitoring Program of the California Resources Agency. Proposed Improvement Area 1 (Figure 2) is located north of the City boundary within an area designated agriculture exclusive; all other improvement areas are within roadways in developed areas of the City. Construction activities in Improvement Area 1 may temporarily impact agricultural use of a portion of the site, however once the new sewer line is installed the site would be returned to pre-project conditions. The proposed project will replace an existing underground sewer line and will not increase system capacity or induce growth. The proposed project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use; it will not conflict with existing zoning or with an existing Williamson Act contract; and it will not involve other changes in the environment which could result in the conversion of existing farmland to a non-agricultural use. Therefore, there will be **less than significant** to prime agricultural land as defined by the program.

c-e) Replacement of sanitary sewer lines will take place within existing roadways and right of ways and will not involve conversion of any agricultural or forest lands. Additionally, there are no timber production zones defined within City limits. The project would not result in loss of forestland. As such, there are no conflicts with the existing zoning, including any timber production zones as defined by Government Code section 51104(g), and **no impacts** will occur.

AIR QUALITY	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?		X		
b) 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?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Setting

The City of Ferndale is located in the North Coast Air Basin (NCAB) and is within the North Coast Unified Air Quality Management District (NCUAQMD) which oversees air quality in Humboldt, Trinity, and Del Norte counties. The District is in attainment for all air quality standards except the State's 24-hour PM₁₀ standard. As of November 2017, Del Norte and Trinity counties were in attainment but Humboldt County was not¹.

¹ California Air Resources Board, Air Quality Planning and Science Division, Area Designations for State Ambient Air Quality Standards PM₁₀, November 2017.

Particulate matter (both PM₁₀ and PM_{2.5}) can be inhaled and cause adverse health effects. Particulate matter in the atmosphere results from many kinds of dust- and fume-producing industrial, agricultural and logging operations, combustion, driving on unpaved roads, and atmospheric photochemical reactions. In rural areas, agricultural activities (tilling, disking and field burning) and logging (tree cutting, burning of slash) are the major sources of particulate matter. In urban areas, vehicle and equipment use, demolition activities, and construction activities are the major sources. In both areas, wood-burning stoves and fireplaces are also a major source of particulates and can cause exposure in residential areas, especially during winter when their use is high and meteorological conditions to prevent the dispersion of associated particulates.

The City of Ferndale consists of a commercial core surrounded by residential neighborhoods, farmland, and timberland. Sensitive air receptors include residential uses and schools. The City's proximity to the coast and its isolation from major populated areas provide for limited air pollutant emissions. Emissions are primarily from fireplaces and road dust. Project related air quality emissions will include short-term construction activities related to grading and other earth moving activities, operation of construction equipment, and travel to and from the project site by workers and equipment. Long-term operational emissions are not expected due to overall system efficiency and I&I improvements.

Discussion

- a) The California Clean Air Act (CCAA) requires the NCUAQMD to achieve and maintain state ambient air quality standards for PM₁₀ by the earliest practicable date. The NCUAQMD Particulate Matter Attainment Plan (1995) includes a description of the planning area, emissions inventory, general attainment goals, and a list of cost-effective control strategies. The PM₁₀ Attainment Plan establishes goals to reduce PM₁₀ emissions and includes three areas of recommended control strategies to meet these goals. Control strategies include transportation control measures such as encouraging car-pooling and bicycle commuting, removal or repair of vehicles with inefficient emission control systems, and traffic flow improvements that reduce idling and vehicle miles traveled (VMT). Land use control measures encourage mixed use or more dense development. The PM₁₀ Attainment Plan also includes measures that limit residential burning as well as various measures to encourage the installation of EPA-certified woodstoves.

The proposed project involves replacement of aging sewer lines which will require the use of heavy construction equipment. All equipment will be fitted with required components to reduce the amount of particulate matter that is released during operation. In order to further reduce any potential impacts, Mitigation Measure AIR-1 will be implemented for all construction phases of the project. Additionally, use of construction equipment will be temporary and not have a long-term effect. As such, the project would not conflict with or obstruct implementation of the NCUAQMD PM₁₀ Attainment Plan. Therefore, the impact would be **less than significant with mitigation**.

Mitigation AIR-1: Fugitive Dust Control: Standard BMPs to control dust during construction activities will be utilized. Best management practices may include applying water to disturbed soils a minimum of two times per day, covering haul vehicles, replanting any disturbed vegetated areas as soon as practical, restrict vehicle speeds on unpaved roads, and other measures as determined necessary to limit dust.

- b) As mentioned previously, the NCUAQMD is in non-attainment for California's 24-hour PM₁₀ standard, but it does not exceed other federal, state or local air quality standards. In the NCAB, most particulate matter is caused by vehicle emissions, wind generated dust, construction dust, wildfire and human caused wood smoke, and sea salts. The project would generate particulate

emissions over the duration of construction in the form of dust and vehicle emissions as a result of earthwork, paving, and other construction activities.

The proposed project will require temporary use of heavy construction equipment for removing asphalt, digging up sewer lines, and placing of new lines, and repair of street surfaces upon completion. This has the potential to create a temporary impact to air quality in the direct vicinity of construction areas. However, all construction equipment will be fitted with required CARB emissions controls and operators will follow all current construction BMPs. Therefore, any potential impacts will be temporary and **less than significant**.

- c) Portions of the proposed project will take place near sensitive receptors including the Ferndale Elementary School and High School. Previously discussed construction activities may result in temporary increases to air pollutants in the immediate vicinity. However, these increases will be similar to regular road maintenance such as crack repair and/or resurfacing. Additionally, as noted previously, heavy-duty construction equipment is subject to a California Air Resources Board (CARB) Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. As such, the potential impacts from the project will not create a permanent source of pollutants and are not considered to be substantial. Therefore, potential impacts from the Project would be considered **less than significant**.
- d) The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Additionally, offensive odors can be highly subjective and vary from person to person.

The proposed project involves the removal and replacement of sanitary sewer lines. Built up gasses and odors from these lines are generally considered unpleasant and are sought to be avoided. However, during removal of the old lines, there is a potential for odors to be released creating a temporary nuisance in the immediate vicinity of construction activity. However, this nuisance will be temporary and will dissipate once the exposed pipeline is removed from the area.

The project involves replacement of sewer lines throughout the City. However, replacement will not occur at the same time. Lines will be replaced incrementally as funding allows. As such, any temporary release of odors will be within a small area of the City and not affect a substantial portion of the population. Since any release of odors due to the project will be temporary and not affect a substantial portion of the population, any impacts will be considered **less than significant**.

BIOLOGICAL RESOURCES	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Depart. of Fish and Wildlife or U.S. Fish and Wildlife Service?			X	

BIOLOGICAL RESOURCES	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Depart. of Fish and Wildlife or U.S. Fish and Wildlife Service?			X	
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		X		
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?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X

Physical Setting

The City of Ferndale is located in the Eel River Valley, however no direct Eel River tributaries flow through the City. Francis Creek flows through the center of the City and is a tributary to the Salt River which flows into the Eel River delta near its entrance to the Pacific Ocean. Riparian and wetland habitats associated with Francis Creek are located along the watercourse in addition to providing potential habitat for special status fish species including coho salmon and steelhead. Other occurrences of sensitive habitat and special status species are limited within City boundaries due to existing urban development and disturbed lands from agricultural practices.

The sewer replacement is focused on areas within the City limits and seeks to provide improved infrastructure in areas that are already impacted by development or other human activities. Proposed Improvement Area 1 (Figure 2) is located north of the City boundary within an area designated agriculture exclusive; all other improvement areas are within roadways in developed areas of the City. Due to the limited potential for the occurrence of special status species and existing development, impacts to biological resources are expected to be limited.

Regulatory Setting

The federal Endangered Species Act ((ESA); 7 USC §136, 16 USC §1531 et seq.) protects the fish and wildlife species and their habitats that the USFWS or NMFS has identified as threatened or endangered.

The USFWS has jurisdiction over plants, wildlife, and most freshwater fish, and NMFS has jurisdiction over anadromous fish, marine fish, and mammals, and these two agencies administer the ESA. Under the California Endangered Species Act (CESA), CDFW has the responsibility for maintaining a list of threatened and endangered species (California Fish and Game Code Section 2070). CDFW also maintains a list of “candidate species,” which are species formally noticed as being under review for addition to either the list of endangered species or the list of threatened species.

Discussion

a,b) The sewer line replacement does not encourage the development of projects in sensitive habitat areas nor will it increase capacity of the overall system. Additionally, work will take place in existing roadways and easements in areas that are heavily disturbed. Proposed Improvement Area 1 (Figure 2) is located north of the City boundary within an agricultural field; all other improvement areas are within roadways in developed areas of the City. As such, construction will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species. Potential impacts due to sewer line replacement would be limited and temporary.

No construction will take place in riparian areas or other sensitive natural communities. Construction areas that are near riparian areas, such as Francis Creek, will adhere to all current construction BMPs to ensure that there is no unintentional water runoff into sensitive areas or other habitat disturbance. In addition, construction activities will be temporary and all areas will be returned to pre-project conditions. Therefore, potential impacts to species identified as a candidate, sensitive, or special status species, or riparian habitats, will be **less than significant**.

c) Proposed Improvement Area 1 (Figure 2) is located north of the City boundary within an agricultural field; all other improvement areas are within roadways in developed areas of the City. Construction activities in Improvement Area 1 may temporarily impact an actively used agricultural field that is seasonally wet and may be considered a coastal act wetland. Since construction activities in this area would take place during the dry season (typically April-October), potential impacts due to sewer line replacement would be limited and temporary. Construction trenching within this area will be filled with in-situ soil and re-planted with native vegetation; once the new sewer line is installed the site would be returned to pre-project conditions.

Construction activities will adhere to all current construction BMPs to ensure that there is no unintentional water runoff into sensitive areas or other habitat disturbance. In addition, because temporary construction activities in Improvement Area 1 will take place during the dry season and the site would be returned to pre-project conditions, potential impacts will be temporary. As such, potential impacts to state or federally protected wetlands, will be **less than significant with mitigation**.

Mitigation BIO-1: Improvement Area 1 Construction: Improvement Area 1 construction activities will take place during the dry season (typically April-October) and will be re-planted with native vegetation; once the new sewer line is installed the site will be returned to pre-project conditions.

d) The sewer line replacement does not propose or encourage development on any habitat areas that would impede movement of species. As such, there will be **no impact** to the movement of any native resident or migratory fish or wildlife species or to established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

- e) The sewer line replacement project maintains consistency with City regulations and ordinances. As such, there will be **no conflict** with any local policies or ordinances protecting biological resources.
- f) The sewer line replacement project was developed in compliance with other local and regional planning documents. It proposes the replacement of sewer lines within the City limits in areas already largely disturbed by urbanization and agricultural use and not subject to conservation. Additionally, there is no Habitat Conservation Plan or Natural Community Conservation Plan for the City. As such, there will be **no conflicts** with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

CULTURAL RESOURCES	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?		X		

Setting

The City of Ferndale was settled by people of European descent in 1852 by the Shaw brothers and companion Willard Allen². Since before that time the area has been home to the Wiyot tribe of Native Americans. The Wiyots have a long history in the areas around Humboldt Bay from the Eel River floodplain north to the Little River and east to the redwood belt. The Wiyots maintained a strong presence along the tributaries to Humboldt Bay. They fished the rivers and the ocean and collected shellfish in abundance³.

Ferndale was settled as an agricultural area and remains so to present day. In 1893 the City of Ferndale was officially incorporated and began providing services to the residents in the area. Early residents of the City included a wide range of European and Asian immigrants who pursued a variety of agricultural and infrastructure related interests. Dairy farming and creameries were brought to the area by the Danes in the 1870's⁴. The City is noted for the many Victorian style houses that were built in the early 1900's and its historic Main Street. The City seeks to maintain the historic nature of the area and in 2012 prepared a Historical and Cultural Resources Element of the General Plan.

The following Ferndale General Plan policies are intended to reduce or avoid impacts to historic resources:

² US Department of Interior, Heritage Conservation and Recreation Service, National Register of Historic Places Inventory – Nomination Form, September 1983.

³ Loud, Llewellyn, Ethnogeography and Archaeology of the Wiyot Territory, 1918.

⁴ City of Ferndale, Historical and Cultural Resources Element, May 2012, pg. 2-2.

2520.3) Rehabilitation of existing structure should be encouraged so as to preserve the City's Victorian character and to increase housing options where the zoning is appropriate.

2540.4) Any alteration of buildings or new construction in the Central Business District should be in keeping with the existing Victorian architecture and historic features.

2560.6) Design control should be maintained for the portion of the City with Victorian structures and Main Street.

In addition to the General Plan policies above, the Ferndale Zoning Ordinance includes design review procedures applicable to all structures within the Design Control Combining (D) zone. These procedures were established to ensure that new buildings and structures and/or the modification, alteration, and/or enlargement of existing buildings or structures occur in a manner consistent with General Plan policies (Zoning Ordinance Section 6.05). Project work will take place within public rights-of-way and will replace existing underground infrastructure.

Discussion

- a) The project involves replacement of existing sewer lines in streets and right of ways through excavation, minor grading, and patching of disturbed street areas. The project includes the installation of new underground sewer lines within Main Street and new laterals to existing historic buildings along Main Street. The new sewer lines and laterals will be underground and will not result in changes to historic resources. Therefore, the project would not cause a substantial adverse change in the significance of a historical resource, a **less than significant** impact will occur.
- b) Previously unrecorded archaeological resources could exist and be unearthed during excavation and grading. Discovery of archaeological resources can occur even in already disturbed areas. The proposed project would be compliant with all General Plan and Municipal Code policies and programs which provide guidelines for any discovery on previously unknown artifacts. Additionally, Mitigation Measure CUL-1 will be implemented for all project phases. Therefore, it is anticipated that potential impacts to historical/archeological resources within the project area will be **less than significant with mitigation**.

Mitigation CUL-1: Inadvertent Discovery of Archaeological Material. If cultural materials (e.g. chipped or ground stone, historic debris, building foundations, bone) are discovered during ground-disturbance activities, work shall be stopped within 20 meters (66 feet) of the discovery, per the requirements of CEQA. Work near the archaeological finds shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the materials and offered recommendations for further action.

- c) In the event that human remains are discovered during development of any site, the project proponent would be required to comply with the State Health and Safety Code 7050.5, which prohibits further disturbance until the County Coroner has made a determination of the origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified immediately of the find. If the remains are determined to be prehistoric, the coroner is required to notify the Native American Heritage Commission (NAHC), which will determine and identify a Most Likely Descendant (MLD). With the permission of the owner of the land or his/her authorized representative, the descendant may inspect the site of the discovery. The descendant shall complete the inspection within 24 hours of notification of the NAHC. The MLD may recommend

scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Mandatory compliance with the State Health and Safety Code is required in the course of excavation for any project undertaken as part of the sanitary sewer replacement program. Additionally, Mitigation Measure CUL-2 will be implemented for all phases of the project. As such, any impacts to human remains would be considered **less than significant with mitigation**.

Mitigation CUL-2: Inadvertent Discovery of Human Remains. If human remains are discovered during project construction, work will stop at the discovery location, within 20 meters (66 feet), and any nearby area reasonably suspected to overlie or be adjacent to human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (Public Resources Code, Section 5097). The coroner will contact the NAHC. The descendants or most likely descendants of the deceased will be contacted, and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.

ENERGY	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				X
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

Setting

Humboldt County is geographically isolated and is almost an energy island. The majority of petroleum-based transportation fuels are imported to the county by barge. There is only one pipeline connecting the county to the larger natural gas grid, and only two major connections to the larger electric grid. The electric transmission capacity (approximately 60-70 MW) that connects Humboldt County to the regional grid is less than half of the County's 170 MW peak electrical demand. For this reason, Humboldt County generates much of its own electricity, mostly using natural gas and biomass fuels⁵.

The Energy Element of the Humboldt County General Plan lists several policies for conserving and reducing energy usage throughout the County. Included in these is the following:

⁵ Redwood Coast Energy Authority (RCEA), Schatz Energy Research Center, RePower Humboldt: A Strategic Plan for Renewable Energy Security and Prosperity, 2013.

E-G2. Increase Energy Efficiency and Conservation. Decrease energy consumption through increased energy conservation and efficiency in building, transportation, business, industry, government, water and waste management.

Discussion

a,b) The proposed project is being undertaken in order to reduce the amount of I&I throughout the City's existing sewer system. By decreasing the amount of I&I throughout the system, less influent will need to be processed by the City's WWTF which will help decrease the facility's current energy usage.

Construction of the project will require use of diesel fuels in heavy-duty equipment. Operators will adhere to current construction BMPs and reduce the use of fuels as much as possible. Operation of the project will not require the use of any additional energy usage beyond what is already utilized for operation of the City's sanitary sewer system. No increases in the capacity of the system are proposed and implementation of the project will likely decrease energy usage overall.

The project will increase the overall efficiency of the sanitary sewer system which is consistent with the Humboldt County Energy Element Policy E-G2 which calls for the increased efficiency in water and waste management. Based on the temporary impacts of construction and the overall reduced energy usage resulting from the project, there will be **no impact**.

GEOLOGY AND SOILS	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a 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? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
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 onsite or offsite			X	

GEOLOGY AND SOILS	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
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 (1994), creating substantial direct or indirect risks to life or property?			X	
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

Setting

Northwest California and the Humboldt Bay region are located in a seismically active region dominated by a series of faults including the Little Salmon fault and the Mad River fault zone. These faults are active and capable of generating large magnitude earthquakes. The activity in the region can be attributed to the collision of three different tectonic plates, the larger Pacific and North American plates, and the smaller Gorda plate that is subducting under the North American. One known fault, the Ferndale fault, runs along the base of hills through the City. This fault is characterized as undifferentiated Quaternary in a moderately constrained location.

The Coast Range Province is characterized by subparallel northwest trending faults. The Little Salmon and Yager Faults lie approximately six miles to the northeast of the City, the Goose Lake Fault Zone lies approximately thirteen miles to the southeast, and the Russ Fault lies approximately thirteen miles to the south-southwest. Of these faults, the State of California Alquist-Priolo Earthquake Fault Zoning Act considers only the Little Salmon Fault active; none of this fault is located within the City.

The Eel River is the third largest river system in California, with a 3,680-square-mile watershed that includes portions of Trinity, Mendocino, Humboldt, Glenn, and Lake Counties. The watershed's dominant geologic formation is the Franciscan Formation, which is prone to landslides and is highly erodible, particularly on steep slopes. Thus, this area is underlain by alluvial deposits consisting of fine-grained fluvial and flood deposits composed of interbedded silts, clays, and fine sands derived from nearby watercourses (Salt River, Francis Creek, and Eel River). These deposits are young and as such are generally poorly consolidated and susceptible to liquefaction during strong ground shaking.

The geology of the City is primarily classified as Q – Marine and Nonmarine (continental) Sedimentary rocks which is described as alluvium, lake, playa, and terrace deposits. A small portion of the City in the hill areas to the south is classified as Qoa – Marine and Nonmarine (continental) Sedimentary rocks which is described as older alluvium, lake, playa, and terrace deposits⁶. Soils in the area are primarily Weott (0 to 2 percent slopes) with some Loleta (2 to 5 percent slopes), Fiedler-Petellen-Nanningcreek

⁶ California Department of Conservation, Geologic Map of California, 2010. Accessed August 1, 2019 from <http://maps.conservation.ca.gov/cgs/gmc/>.

complex (30 to 50 percent slopes), and Swainslough (0 to 2 percent slopes)⁷. Various other soils exist in the area in minimal amounts.

Discussion

a.i-iv) A number of known active faults traverse the region surrounding the City, and earthquake and ground shaking in the region are unavoidable. The nearest active fault is the Little Salmon Fault, located approximately 6 miles northeast of the City. The Ferndale fault is located within the City limits but is not known to be active. In addition, the City is within 25 miles of the Cascadian Subduction Zone, where the oceanic crust of the Gorda and Juan de Fuca plates are being subducted beneath the continental crust of the North American Plate⁸.

Landslides due to seismic shaking are unlikely in the project area due to the flat nature of the City. Some portions of the City along the hillsides may be more susceptible. However, these areas are primarily Public Facility and Agricultural Exclusive lands and are not identified for sewer replacement at this time. The City's sewer main currently terminates on Cleveland Street near Fireman's Park along the gradually sloped Francis Creek ravine.

The City of Ferndale is situated on alluvial plains which may be susceptible to liquefaction⁹. However, all construction will be built according to seismic requirements set forth in the California Building Code Title 24 which would decrease the potential for impacts.

Therefore, as addressed above, a **less than significant** impact would occur with regards to exposing people or structures to potential substantial adverse effect involving: the rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map; strong-seismic ground shaking; and seismic related ground failure including liquefaction and landslides.

- b)** Construction associated with the project will be conducted entirely within existing roadways and utility easements for the City. The majority of construction will take place in roadways that are already devoid of topsoil. In areas not within roadways, applicable erosion control measures and Best Management Practices such as re-vegetation and covering soil stockpiles will be utilized. Implementing these measures would avoid substantial erosion or topsoil loss resulting in a **less than significant** impact.
- c,d)** The project will take place entirely within already disturbed areas that are primarily within roadways. The project will not involve grading that could cause soil to become unstable. By adhering to the standards of the California Building Code any impacts would be considered **less than significant**.
- e)** Sewer service is provided throughout the City of Ferndale. As such, there will be **no impact** in which there are 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.

⁷ USDA, Natural Resources Conservation Service, Web Soil Survey. Accessed August 1, 2019 from <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.

⁸ USGS, US Quaternary Faults. Accessed August 1, 2019 from

<https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf>.

⁹ Humboldt County Planning Department, Liquefaction Hazard Zones: Humboldt County, California, 2015.

- f) The project involves excavation of sewer lines in historic portions of the City. While the area has been previously disturbed, there is potential for unearthing of previously unknown paleontological resources. As discussed under cultural resources, the proposed project would be compliant with all General Plan and Municipal Code policies and programs which provide guidelines for any discovery of previously unknown artifacts. Additionally, there are no unique geologic features in the area that may be disturbed by the project. As such, any impacts to unique paleontological resource or site, or unique geologic features, will be **less than significant**.

GREENHOUSE GAS EMISSIONS	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Setting

Global temperatures are affected by naturally occurring and anthropogenic-generated atmospheric gases such as water vapor, carbon dioxide, methane, and nitrous oxide. Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). Emissions of GHGs from human activities such as electricity production, motor vehicle use, and agriculture, are elevating the concentration of GHGs in the atmosphere and are reported to have led to a trend of unnatural warming of the earth's climate, known as global warming or global climate change, and should be lessened and/or mitigated whenever possible. Other than water vapor, the primary GHGs contributing to global climate change include the following gases:

- Carbon dioxide (CO₂), primarily a byproduct of fuel combustion;
- Nitrous oxide (N₂O), a byproduct of fuel combustion and also associated with agricultural operations such as the fertilization of crops;
- Methane (CH₄), commonly created by off-gassing from agricultural practices (e.g., livestock), wastewater treatment, and landfill operations;
- Chlorofluorocarbons (CFCs), which were used as refrigerants, propellants, and cleaning solvents, although their production has been mostly prohibited by international treaty;
- Hydrofluorocarbons (HFCs), which are now widely used as a substitute for chlorofluorocarbons in refrigeration and cooling; and
- Perfluorocarbons (PFCs) and sulfur hexafluoride (SF₆) emissions, which are commonly created by industries such as aluminum production and semiconductor manufacturing.

In 2002, the California legislature declared that global climate change was a matter of increasing concern for the state's public health and environment, and enacted laws requiring the state Air Resources Board (ARB) to control GHG emissions from motor vehicles (Health & Safety Code §32018.5 et seq.). CEQA Guidelines define greenhouse gases to include carbon dioxide (CO₂), nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. The California Global Warming Solutions

Act of 2006 (Assembly Bill 32) definitively established the state's climate change policy and set GHG reduction targets (Health & Safety Code §38500 et seq.).

In 2011, the CEQA Guidelines Section 15064.4 Appendix G was modified to include thresholds of significance for Greenhouse Gases. The project would have potential significant impacts if the project would: generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Discussion

- a) The proposed project will require the use of heavy-duty equipment for construction. This equipment will create a temporary increase in GHG emissions. However, any and all equipment used for construction is required to adhere to current CARB regulations and current construction BMPs in order to reduce GHG emissions. Operational GHG emissions will remain the same or be reduced due to the reduction in influent that needs to be treated at the WWTF. Therefore, any impacts on GHG levels as a result of the project will be **less than significant**.
- b) The California Climate Solutions Act of 2006 (AB 32) requires that statewide GHG emissions be reduced to 2000 levels by the year 2010, 1990 levels by the year 2020, and to 80 percent less than 1990 levels by year 2050. These reductions are to be accomplished through an enforceable statewide cap on GHG emissions that were phased starting in 2012. By adhering to current construction BMPs and CARB regulations the proposed project will not conflict with any existing policies or plans regarding the reduction of GHG emissions. Therefore, any impacts associated with the project to be **less than significant**.

HAZARDS AND HAZARDOUS MATERIALS	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
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?				X

HAZARDS AND HAZARDOUS MATERIALS	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
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 result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

Setting

Humboldt County is the primary agency responsible for emergency response and evacuation planning in the County. Local agencies, such as the City of Ferndale, are required to coordinate emergency planning with the Humboldt County Office of Emergency Services (HCOES). The Humboldt County Emergency Operations Plan (EOP) and Local Area Hazard Mitigation Plan (LAHMP) serve to address planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies in or affecting Humboldt County. These plans establish the organization, responsibilities, and procedures to adequately respond to natural and man-made emergencies. According to the State Water Resources Control Board GeoTracker website there are five open Leaking Underground Tank (LUST) cleanup sites located in Ferndale. These sites are monitored regularly by the County of Humboldt. There are approximately 30 closed cleanup sites within the City.

Discussion

a,b) The Citywide sewer line replacement project will involve excavation of the existing pipeline in existing street right of ways and utility easements, installation of new PVC pipeline, backfill, and patching of disturbed street areas. Materials used on site during construction activities would be properly stored and secured to prevent access by the general public. Temporary use of asphalt and other materials typical of construction activities would occur. However, the types and quantities of hazardous materials to be used are not expected to pose a significant risk to the public and/or environment and would be managed in accordance with federal, state, and local regulations. Since the transport, use, and storage of any limited hazardous materials at the site would be required to be conducted in accordance with all federal, state, and local regulations, a less than significant impact would occur.

The project would not transport, or dispose of hazardous materials, and thus would not create a significant hazard to the public or the environment associated with these materials by creating accident conditions or through routine transport of hazardous materials. This project is not expected to require the use, transportation, disposal, or storage of dangerous quantities of hazardous materials. Materials will be used to patch disturbed street areas; however, it will be temporary and limited to the hours of 7 a.m. to 7 p.m. during weekdays and 8 a.m. to 7 p.m. on weekends in accordance with the City of Ferndale Noise Ordinance.

The proposed project would not conflict with any hazardous materials regulations and would not be exempt from the City's programs to control and safely dispose of hazardous materials and wastes. It is not expected that there will be any spills, however, in the event there is a spill, it will be immediately contained and cleaned up using absorbent materials and/or soil removal and disposal. All spills will be reported to the Humboldt County Department of Environmental Health and Human Services and/or the State Office of Emergency Services. All contaminated soil will then be removed and disposed at the local hazardous waste facility in Eureka. Therefore, any impacts associated with the implementation of the Citywide sewer line replacement project are considered to be **less than significant**.

- c) The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school. Temporary use of asphalt and other materials typical of construction activities would occur in construction areas including areas adjacent to Ferndale High School. However, used of potentially hazardous materials would be contained to the immediate construction area and any and all spills would be contained immediately to prevent potential exposure. Construction work may take place on the elementary school grounds, but will be performed during the summer when students are not present. The proposed project would not conflict with any hazardous materials regulations and would not be exempt from the City's programs to control and safely dispose of hazardous materials and wastes according to the City's Sewer Ordinance 03-05. As such, a **less than significant** impact would occur.
- d) The project would take place in already disturbed sites which are not hazardous sites as determined by Government Code Section 65962.5. As such, there would be **no impacts** that would create a significant hazard to the public or the environment.
- e) There are no airports within two miles of the City of Ferndale. As such, there will be **no impacts** that would result in a safety hazard or excessive noise for people residing or working in the project area.
- f) The City of Ferndale is a participant in the Humboldt Local Hazard Mitigation Plan which was updated in 2019. This plan meets the requirements of the Disaster Mitigation Act and takes a proactive approach to planning for disaster situations. The associated maintenance as a result of the sewer line replacement project is not anticipated to interfere with current emergency response plans including the LHMP because the project will be completed in phases as funding allows ensuring accessibility by main evacuation routes. Therefore, any impacts associated with implementation of the project are considered to be **less than significant**.
- g) The project seeks to replace sewer lines with the majority in City limits and a small portion outside of City limits which are currently served by the Ferndale Volunteer Fire Department. Construction will take place along already disturbed street right of ways and utility easements located in urbanized areas with low fire risks. As such, there are **no impacts** that would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

HYDROLOGY AND WATER QUALITY	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		X		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation on or offsite;			X	
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
(iii) 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; or			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

Setting

The Eureka area, including the City of Ferndale, sees a normal annual precipitation of 40.33 inches¹⁰ and benefits from the marine cloud layer that covers the area on an almost daily basis. Major hydrological features in and around the City include the Eel River approximately 3 miles north and 5.5 miles east of the City center, and the Pacific Ocean approximately 4 miles to the west. The City of Ferndale is within the lower Eel River Watershed. The Eel River watershed has a total drainage area of approximately 3,680 square miles and extends from the headwaters in the mountains to the east, to the mouth of the river at the Pacific Ocean. Ferndale is located approximately 4 miles southeast of the Eel River mouth. Francis Creek is a tributary to the Salt River, which discharges into the Eel River slough at the river mouth. Francis Creek is a perennial stream with a small watershed, and stream flow quickly subsides after moderate rain events. Flooding events occur periodically during large storm events.

¹⁰ National Weather Service Forecast Office – Eureka, CA, Climatological Report (Annual), January 1, 2019.

Much of the City is flat in nature with a less than 5% grade. The City maintains a stormwater system separated into east and west drainage basins by Francis Creek. Stormwater from the City eventually flows into the Salt River to the north¹¹. Surface water flows generally follow natural waterways but have also been altered by constructed features (e.g. drainage channels, detention basins) including the City's stormwater system. Federal, State, County and City regulations, plans, and permits are in place to control and minimize pollutants in stormwater runoff and treated wastewater discharges, including but not limited to the federal Clean Water Act, State Quality Control Plan for the North Coast Basin (Basin Plan) State Water Resources Control Board NPDES Permit and Waste Discharge requirements for WWTF discharge, State TMDLs for the Eel River, Ferndale Drainage Master Plan (2004), and Floodplain Management Ordinance 08-02. These regulations, plans, and permits have been designed to avoid significant water quality impacts associated with development. In addition, new discretionary residential projects would be subject to project-level environmental review and mitigation under CEQA.

The Eel River basin is the largest source of groundwater in the greater Eureka area. Groundwater is tapped in the lower eight miles of the Eel River Valley for agricultural, industrial, and domestic use. River terrace deposits are important sources of groundwater. The river terrace deposits consisting of recent alluvium are important aquifers where they are lower than the Eel River, are hydraulically connected to the river, and are recharged by high water events. Recharge of groundwater to the lowest terrace deposits and recent alluvial deposits is by underflow from the Eel River and infiltration by rainwater. Recharge of these units can occur rapidly during periods of heavy precipitation or flooding.

The Eel River groundwater basin has a surface area of approximately 115 square miles¹². There are approximately 12 municipal or agricultural wells and 219 domestic wells obtaining water from the basin with well yields of less than 1,200 gallons per minute¹³. The average demand estimate for the City is approximately 208,000 gallons per day which is 40% of the source capacity of 518,000 gallons per day¹⁴.

Discussion

- a) The City of Ferndale is subject to the North Coast Regional Water Quality Control Board regulations including water quality objectives as listed in Chapter 3 or the North Coast Basin Plan¹⁵. Additionally, the Wastewater Treatment Facility is subject to Waste Discharge Requirements (WDRs) under NPDES No. CA0022721 for water recycling. These WDRs set limitations on the effluent that is discharged from the facility at two separate points¹⁶. Increased water flows from I&I in the sewer system can have a negative effect on the treatment facility by overwhelming the system and increasing the amount of total suspended solids and other water quality factors that must be treated before discharge. This is most noticeable during storm events when I&I is highest. The proposed project would decrease the amount of I&I in the system and allow the treatment facility to function at a regular capacity year round including during storm events.

Construction of the project will take place entirely within existing roadways and utility easements. Construction activities may create conditions for potential runoff. To help prevent any runoff from

¹¹ Humboldt LAFCo, City of Ferndale Municipal Service Review, November 2018, pg. 23.

¹² California Department of Water Resources, Groundwater Bulletin 118, North Coast Hydrologic Region – Eel River Valley Groundwater Basin, updated February 2004.

¹³ Humboldt County General Plan Update, Revised Draft Environmental Impact Report, Chapter 3.10 – Hydrology and Water Quality, April 19, 2017.

¹⁴ Humboldt LAFCo, op. cit., pg. 20.

¹⁵ North Coast Regional Water Quality Control Board, Water Quality Control Plan for the North Coast Region, Chapter 3: Water Quality Objectives, June 2018.

¹⁶ NCRWQCB, Order No. R1-2018-0046, Waste Discharge Requirements and Water Recycling Requirements for the City of Ferndale Wastewater Treatment Plant, Humboldt County. November 14, 2018.

work sites that may degrade surface or groundwater quality, contractors will adhere to current construction BMPs which may include but is not limited to the use of swales to prevent runoff from the area. Additionally, spill response will be handled according to Mitigation Measure HYD-1.

Due to the high groundwater table in many parts of the city, groundwater may be encountered during trenching. Should groundwater be encountered, the trench will be shored, and water will be pumped out of the active construction area and into the collection system downstream of the site. This will prevent any contamination of groundwater at or near the construction site. With the implementation of construction best practices and mitigation measures, any impacts due to implementation of the project related to water quality standards, waste discharge requirements, or surface and ground water quality, would be **less than significant with mitigation**.

Mitigation HYD-1 Spill Response: Spill response materials will be made available on site during Project construction activities. These materials shall include drip pans, buckets, absorbent pads, strawbales, absorbent clay, sawdust, spill containment barriers, heavy plastic sheeting, plastic bags, shovels, and sealable containers, depending on the activities involved.

- b) Implementation of the sewer line replacement project would not adversely affect groundwater resources in the area. Reduction of I&I throughout the sewer system has the potential to increase groundwater levels in the area as much of the I&I is from groundwater entering the system. No additional impervious surfaces are proposed as part of the project and all construction BMPs will be adhered to in an effort to prevent groundwater contamination. As such, there would be **no impacts** to groundwater.
- c.i-iii) The project seeks to replace aging and damaged sewer lines throughout the City in an effort to reduce I&I. Construction activities will take place in existing roadways and easements and will not involve construction of additional impervious surfaces. The current state of the sewer lines in the City allows for a high amount of I&I. As such, during storm events, water has the ability to infiltrate the lines and drain to the WWTF. After implementation of the project, water will not be able to infiltrate sewer lines and may lead to additional potential runoff in the area. However, as the City is largely developed with urban improvements including impervious surfaces for roadways, sidewalks, and parking lots, the additional runoff is anticipated to be minimal. Additionally, the City is in the process of updating its Drainage Master Plan. This plan will identify and guide drainage upgrades throughout the City over the next 10 years. Proposed project activities do not significantly affect sensitive waterways or riparian habitats and will not substantially alter the existing drainage pattern of the area in a manner that would result in flooding, erosion, or siltation on- or off-site, or create runoff water which would exceed the capacity of existing drainage systems or provide substantial additional sources of polluted runoff. Based on the minimal amount of additional runoff and the City's current planning efforts for drainage, impacts are anticipated to be **less than significant**.
- d) The Eel River Valley is subject to flooding and in heavy rainfall years portions of the City may be inundated by flood waters. The sewer line replacement project does not encourage development in districts that may be adjacent to flood prone areas, nor will it increase capacity of the system. Additionally, the project will repair deteriorated pipelines that may be susceptible to further decline and potential failure during flood events. As such, there would be **no impacts** to flood areas.
- e) The Eel River Valley was ranked as medium priority by the California Department of Water Resources. However, it was demonstrated that the basin has operated within its limits over a 10-

year period and is now subject to an Alternative Annual Report. Any activities resulting from implementation of the sewer line replacement project would adhere to the regulations and guidelines set forth by the City in order to protect water resources and would be in keeping with the North Coast Basin Plan (discussed earlier). Therefore, implementation of the project would not conflict with current plans and **no impacts** are anticipated.

LAND USE AND PLANNING	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

Setting

Predominant land uses in the City are single family residential surrounded by agriculture, commercial along Main Street, and public and open space uses. The General Plan Land Use Element guides growth and development. The Land Use Element includes: (1) a set of goals and policies which guide land use decisions; (2) a set of land use designations which identify the type, density and development standards of permitted/ planned land uses; and (3) a General Plan Land Use Map which identifies the distribution of permitted/ planned land uses by land use designation.

Discussion

a,b) The project would not physically divide an established community as it involves replacement of existing pipeline in existing street right of ways within the established community of Ferndale. Further, the project was identified as a Capital Improvement Project, and as such is consistent with the General Plan. Therefore, **no impacts** are anticipated on land use and planning elements.

MINERAL RESOURCES	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
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?				X
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?				X

Setting

There are no surface mining operations within the Ferndale City limits, but the County supports a significant number of river and quarry mining operations that extract over one million cubic yards of material annually. These mining operations support the construction industry of Northern California.

Aggregate (sand and gravel) resources in Humboldt County are concentrated along the Eel and Van Duzen Rivers. The nearest sand and gravel extraction activities to Ferndale are located at Fernbridge on the Worswick Bar.

Discussion

a,b) Mineral resources used in connection with the replacement of sanitary sewer lines will be those associated with construction and road repair. The limited amount of mineral resources needed for the sanitary sewer line replacements within the City would not have a substantial adverse impact on the local mineral resources or reserves. Therefore, based on the above, the proposed project would not result in the loss of availability of a State or locally known mineral resource and **no impacts** are anticipated to occur.

NOISE	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive ground borne vibration or ground borne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or 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?				X

Setting

The City of Ferndale has established ordinances concerning noise in its broader Nuisance Ordinance 06-04. §7.04 of the Nuisance Ordinance outlines activities considered to be unlawful including excessive noise from residences and automobiles. Additionally, §7.04.2(d) refers to construction noise within the City. Construction activities are limited to between 7 a.m. and 7 p.m. on weekdays and 8 a.m. to 7 p.m. on weekends with no construction allowed on Federal holidays.

The City also addresses noise in the General Plan Noise and Air Quality Element. The Noise Element states that traffic is the main source of noise within the City. Normal ambient levels on Main Street were measured at 52 dB and at 5th at Shaw Streets ambient levels were measured at 45 dB which is below the normally accepted levels for residential areas as outlined by the California Department of Health, Office of Noise Control¹⁷.

¹⁷ City of Ferndale, General Plan Noise and Air Quality Elements, April 2016 Draft, pg. 4-2 to 4-3.

Community noise is commonly described in terms of the “ambient” noise level, which is defined as the all-encompassing noise level associated with a given noise environment. A common statistical tool to measure the ambient noise level is the average, or equivalent sound level (L_{eq}), which corresponds to a steady-state sound level containing the same total energy as a time varying signal over a given period (usually one hour). The L_{eq} is the foundation of the composite noise descriptors such as L_{dn} and CNEL, and shows very good correlation with community response to noise. The California Department of Health Services’ (DHS’s) Office of Noise Control has studied the correlation of noise levels and their effects on various land uses and has published land use compatibility guidelines for the noise elements of local general plans. The guidelines are the basis for most noise element land use compatibility guidelines. The recommended maximum normally acceptable noise levels for various land uses are shown below.

Table 1: Maximum Allowable Ambient Noise Exposure¹⁸

Land Use	Suggested Maximum (L_{dn} dBA)
Residential - Low Density	60
Residential - High Density	65
Transient Lodging	65
Schools Libraries Churches Hospitals	70
Auditoriums	70
Playgrounds Parks	70
Commercial	70
Industrial	75

Note: L_{dn} = day-night average sound level.

Discussion

- a) Replacement of sanitary sewer lines will result in a temporary increase of ambient noise levels due to use of construction equipment. Specifically, excavation of lines within roadways may require asphalt saws, jackhammers, front loaders, and other heavy equipment. A sample list of equipment and associated noise level is shown below.

Table 2: Construction Equipment Noise Levels

Equipment Type	Measured L_{max} at 50 ft (dBA) ¹⁹
Jackhammer	89
Excavator	81
Compactor (ground)	83
Front End Loader	79
Pneumatic Tools	85

Use of construction equipment will exceed the normal ambient noise level on Main Street and the recommended ambient noise levels for commercial and residential areas. However, these elevated noise levels will be temporary and construction activities will be confined to the hours of 7 a.m. to

¹⁸ California Governor’s Office of Planning and Research, General Plan Guidelines: 2017 Update, Appendix D – Noise Element Guidelines, July 2017.

¹⁹ Federal Highway Administration, Construction Noise Handbook, Chapter 9.0: Construction Equipment Noise Levels and Ranges. Accessed October 8, 2020 from https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook09.cfm.

7 p.m. during weekdays and 8 a.m. to 7 p.m. on weekends in accordance with the City of Ferndale Noise Ordinance. Additionally, impacts will be further reduced with implementation of Mitigation Measures NOI-1. Therefore, any impacts on noise levels as a result of the Project are considered to be **less than significant with mitigation**.

Mitigation NOI-1 Construction Noise: Project contractors will utilize the best available noise control techniques when working within the residential areas such as improved mufflers on the equipment. Additionally, all motorized equipment shall not be left idling for excessive periods of time when not in use.

- b) Construction activities resulting from replacement of sanitary sewer lines may produce some ground vibration. This vibration will occur in areas previously disturbed by construction activities and readily used for transportation by gravel mining and agricultural trucks. The ground vibration will be temporary in nature and will only be present when heavy machinery such as excavators or jackhammers are used. Therefore, any impacts on ground vibration as a result of the Project are considered to be **less than significant**.
- c) There are no airports located within two miles of the City of Ferndale. As such, there will be **no impacts** that would expose people residing or working in the project area to excessive noise levels.

POPULATION AND HOUSING	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Induce substantial unplanned population growth in the area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Setting

According to the 2010 US Census, the City of Ferndale had a population of 1,371. The most recent American Community Survey (ACS) 5-year estimate based on 2014 to 2018 data shows a population increase to 1,365 (+/-213). The ACS also estimates that there are 741 (+/-87) housing units within the City with an average household size of 2.28 persons. The projected growth rate for Humboldt County overall is expected to be approximately 1.9% during the 2019 to 2027 RHNA review period²⁰ according to the California Department of Finance. The HCD has a slightly higher projection of 3.0% for the county which was used in determining the projected housing need²¹.

Discussion

²⁰ California Department of Finance, Demographic Research Unit, Projections 2010-2060, Updated May 2019.

²¹ California Department of Housing and Community Development, Division of Housing Policy Development, Final 6th Cycle Regional housing Need Determination for Humboldt County, August 27, 2018.

- a,b)** The Project proposes to replace aging sanitary sewer lines throughout the City. Lines will be replaced with right sized plastic piping to accommodate existing demands. No extension of lines or increase of capacity is proposed. As such, the Project will not indirectly induce population growth or displace existing people or housing and **no impacts** are anticipated to occur.

PUBLIC SERVICES	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of 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:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X

Setting

The City of Ferndale is responsible for providing several public services including, but not limited to, wastewater collection and treatment, stormwater management, police protection, and parks and recreation. These services are considered vital to the health and well-being of residents in the City. Ferndale Unified School District provides elementary, middle, and high school education for area residents. The City also has a library that is a branch of the Humboldt County Public Library system.

Discussion

- a)** The Ferndale Volunteer Fire Protection District (VFPD) provides fire protection services to the City of Ferndale and the unincorporated communities of Grizzly Bluff, Arlynda Corners, Centerville, Port Kenyon, Wildcat Ridge, and other areas south of the Eel River²². Construction activities will take place along Brown Street where the Ferndale VFPD station is located. In order to ensure continued accessibility, the selected contractor will work closely with the VFPD to ensure that engines are able to exit and enter the station as necessary so there will be no interruption of service.

The Project does not propose any activities that may increase the number of emergency medical or fire calls either in the short term or long term. Construction activities will take place under standard OSHA guidelines and all necessary personal protection equipment will be worn to reduce the likelihood of severe injury. As such, **less than significant impacts** on fire protection within the City are anticipated.

- b)** Law enforcement in the City of Ferndale is provided by two agencies: the Ferndale Police Department (PD) and the Humboldt County Sheriff's Department (SD). The Ferndale PD provides services within the City limits and the SD provides services in the adjacent unincorporated areas. In the event additional aid is needed, officers from other nearby agencies will respond including Eureka, Rio Dell, California Highway Patrol, and California Department of Fish and Wildlife.

As with fire protection, the Project is not anticipated to result in any additional emergency or non-emergency calls that would require police assistance. However, the police department may be

²² Humboldt LAFCo, op. cit., pg. 25.

utilized for traffic control during construction periods should construction crews be insufficient to maintain traffic flow around active work areas. This use will be temporary and limited to locations where work is actively taking place in roadways. Therefore, any impacts on police services from the Project are considered to be **less than significant**.

- c) School services in the City of Ferndale are provided by the Ferndale Unified School District which currently operates the Ferndale Elementary School and Ferndale High School. There are currently 350 students at the elementary school which serves grades TK to 8th and 160 students at the high school which serves grades 9th to 12th.²³ The Project does not have any project elements associated with school services nor will it increase capacity of the system which could lead to additional development. All construction work on the elementary school grounds will take place during the summer when there are no students present and will not interrupt instruction. Therefore, **no impact** will occur.
- d) See section Recreation “a”.
- e) Replacement of sanitary sewer lines will have a direct positive impact on the wastewater treatment facility. The Project is intended to reduce I&I which will increase the efficiency of the treatment plant and reduce reliance on the wastewater retention pond during wet weather flows. No other services are anticipated to be impacted. As such, there will be **no impact** to other services.

RECREATION	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
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?				X
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?				X

Setting

The City of Ferndale maintains two parks within the City boundary: Russ Park and Firemen’s Park. Russ Park is a 105-acre park in the south of the City that contains several walking trails totaling approximately 4 miles. It was deeded to the City in 1920 by Mrs. Zipporah Patrick Russ. Firemen’s Park, also located in the southern portion of the City, offers a picnic area, playground, softball field, and Bocce Courts²⁴. The City also contains the Humboldt County Fairgrounds which is used for a variety of regional activities, including but not limited to fairs, horse racing, and bicycle races. Although the City does not have a park standard or park dedication requirements, the City’s existing park to population ratio exceeds the

²³ Ferndale Unified School District, Local Control Accountability Plan and Annual Update (LCAP), Year 2018-19, November 2018.

²⁴ City of Ferndale, Facilities, Firemen’s Park and Russ Park. Accessed August 2, 2019 from <https://ci.ferndale.ca.us/city-of-ferndale-facilities/russ-park/>.

State's recommended Quimby Act guideline of 3-5 acres of parkland per 1,000 residents.

Discussion

- a,b)** It is anticipated the project would not increase usage of park facilities because there will be no expansion of service or increase of capacity that could lead to further development within the City, thereby increasing population or visitor use. The project does not include recreational facilities or require the construction or expansion of recreational facilities. As such, there will be **no impact**.

TRANSPORTATION	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				X
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?			X	

Physical Setting

The City of Ferndale encompasses one square mile of land along the southern edge of the Eel River plain. The main access road is Highway 211 which turns into Main Street within the City. Other small streets branch off of Main Street creating a small network of roadways with an irregular pattern. Currently, there is no transit system that operates in the City. As such, City residents must rely on personal transportation to commute to areas outside the City.

Highway 211 crosses the Eel River at Fernbridge and is sometimes subject to flooding. In cases of heavy rainfall and runoff, the Eel River overflows its banks and floods the western approach of Fernbridge resulting in closure of Highway 211. When closed, Ferndale residents must use backroads, such as Grizzly Bluff Road, to travel to Bellevue approximately 10 miles southeast of the City.

The City of Ferndale maintains their Traffic Ordinance 04-01 which provides regulations for roadways including rules for bicycles, skateboards, parking, riding animals, and other traffic related issues. The purpose of the ordinance, as stated in §1.02, is for the preservation of the public safety and welfare in connection with vehicle and pedestrian traffic.

Regulatory Setting

The Humboldt County Association of Governments conducts a regular update to the Humboldt County Regional Transportation Plan with the latest update completed for planning year 2017. The plan serves as a guide for coordinated and efficient development of the transportation system in the region. It also

takes into consideration several other regional plans including bike plans, transit development plans, and trails plans in an effort to promote an efficient and useful multimodal transportation network for area residents.

In January 2019, the Governor’s Office of Planning and Research released comprehensive updates to the CEQA Guidelines, including updates to the Transportation Section, including changing the title of the section from “Transportation and Traffic” to simply “Transportation”, and adding a new section regarding determining the significance of a project’s transportation impacts (CEQA Guidelines Section 15064.3). The updated guidelines exhibit a clear intent to prioritize infill projects and shift away from congestion-based Level of Service (LOS) standards to Vehicle Miles Traveled (VMT), which more efficiently analyzes a project’s energy usage and overall environmental impact. Using VMT also ensures that infill projects, which may cause traffic congestion but also decrease energy inefficiencies, are not penalized.

CEQA Guidelines Section 15064.3. Determining the Significance of Transportation Impacts.

(a) Purpose. This section describes specific considerations for evaluating a project’s transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, “vehicle miles traveled” refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) (regarding roadway capacity), a project’s effect on automobile delay shall not constitute a significant environmental impact.

Discussion

a) The project seeks to improve and maintain one of the City’s primary services: wastewater. The project would be subject to current City ordinances concerning construction work within roadways and easements. The project does not propose any permanent alteration to the street network or traffic flow of the city. There may be temporary disruptions in traffic flow from construction activities as work will largely be taking place in road right of ways. However, it is not anticipated that work will require complete street closures and detours. Additionally, any potential impacts will be further reduced by Mitigation Measure TRAF-1. As such, any impacts to current programs and plans would be **less than significant with mitigation**.

Mitigation TRA-1 Traffic Control Plan: Project contractors will prepare a Traffic Control Plan for any work that will substantially alter traffic flow patterns. The Plan will be submitted to the City and Caltrans (if required for the Main Street sections).

b) Section 15064.3 (b) of the CEQA guidelines outlines “Criteria for Analyzing Transportation Impacts”. The project will not permanently alter the current design of streets or traffic flow patterns in the City and will not create a new source or destination for vehicle trips. Humboldt County does not currently have VMT thresholds or guidelines. However, the Project is the rehabilitation of an existing underground wastewater pipeline, and as such the Project will not significantly impact VMT. Construction of the project will create a temporary increase in VMT due to additional construction workers traveling to the project site and the use of construction equipment. However, this increase in trips will be temporary and take place in phases as funding becomes available. As such impacts on VMTs are anticipated to be **less than significant**.

c) No modifications to roadway features are proposed as part of the Project. The Project would replace existing underground pipeline and result in minimal work outside of the existing pipeline rights-of-

way. No permanent alterations to the design of roadways or features will take place as part of the project. As such, the project will not substantially increase hazards and **no impact** will occur.

- d) The Project would replace portions of an existing wastewater pipeline and involve other minor improvements to the underground wastewater conveyance system. No long-term modifications to roadway features are proposed as part of the Project and, therefore would not result in any long-term adverse impacts on emergency access during the operational phase.

Traffic disruption may occur during Project construction, including in front of the Ferndale Volunteer Fire Department located on Brown Street. The contractor will be required to work in stages to allow the fire trucks to respond to calls. The fire department and other emergency service providers will be well informed of the Project construction and appropriate measures for emergency access will be established. Therefore, the Project would not result in inadequate emergency and have a **less than significant** impact in this area.

TRIBAL CULTURAL RESOURCES	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k), or		X		
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the Lead Agency shall consider the significance of the resource to a California Native American Tribe.		X		

Setting

Wiyot occupation of the Humboldt Bay region preceded Euroamerican history from “time immemorial.” Wiyot people lived along and fished the Eel River until the time of European settlement when they were driven out. A small village, Wotwetwok, was once located along the Salt River which runs north of the City and is a tributary to the Eel River²⁵. It is likely that Wiyot peoples utilized the lands in and around Ferndale for hunting, fishing, and gathering purposes before the City was settled in 1852.

²⁵ California Department of Fish and Game, Salt River Watershed Assessment, May 2005. Native Inhabitants summary provided by Marnie Atkins, Cultural Director of the Table Bluff Reservation of the Wiyot Tribe, pg. 43.

A Tribal Consultation notice was sent to representatives of the Wiyot Tribe and the Bear River Band of Rohnerville Rancheria in accordance with AB 52 and pursuant to Public Resources Code §21080.3.1 on January 5, 2021. No responses have been received from either tribe.

Discussion

- a, b)** The project seeks to replace sewer lines in already disturbed areas by excavating existing pipelines in existing street right of ways and utility easements, installing new PVC pipeline, backfilling, and patching disturbed street areas. No known tribal cultural resources have been identified within the Project area. Excavation will occur in already disturbed areas, however, there does exist a possibility of unearthing unknown artifacts of historical significance to local tribes during construction activities. In such an event, the project will be subject to local and regional regulations regarding tribal resources and Mitigation Measures CUL-1 and CUL-2 will be utilized. With implementation of these measures, potential impacts related to tribal cultural resources would be **less than significant with mitigation**.

UTILITIES AND SERVICE SYSTEMS	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				X
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X

Setting

The City of Ferndale provides multiple basic services to the community including, but not limited to, public facilities, public roads, stormwater management, and wastewater collection and treatment. Water service is provided by the Del Oro Water Company which also provides water to service districts in several counties.

The City owns and operates a WWTF located just north of the City boundary within unincorporated Humboldt County. Treated wastewater discharges are regulated by the RWQCB Waste Discharge Requirements (WDR's). The RWQCB approved new WDRs for the City in July 2009, which allowed for a variance to Basin Plan requirements for the City's proposed WWTF upgrades. The City spent considerable time, effort and resources to comply with RWQCB requirements and to work towards the permitting and construction of WWTF upgrades which were completed in 2012.

Discussion

- a) The project would not result in relocation of wastewater treatment, but rather will replace existing sewer lines within existing roadways and easements. The project will also not require the construction of additional wastewater treatment facilities at will not increase the overall capacity of the system.

Replacement of the sewer lines will reduce the overall amount of I&I allowing the treatment system to operate more effectively. However, by reducing the amount of I&I, there may be an increase of surface ponding and runoff during precipitation events. However, the amount of additional runoff, if any, is likely to be minimal as much of the city is developed and includes impervious surfaces. Additionally, the City is in the process of updating its Drainage Master Plan which will help guide improvement of the existing stormwater system. Based on the minimal amount of additional runoff expected and the current planning efforts of the City, impacts are expected to be less than significant.

- b) The City of Ferndale obtains water from the Del Oro Water Company's Ferndale District. The Ferndale District consists of one well and one large concrete storage tank along with associated water mains and other distribution infrastructure. Two springs and the well provide a maximum production capacity of approximately 518,000 gallons per day. As of 2012 only approximately 40% of the maximum production was being used²⁶ which allows ample room for growth in the community. The project does not involve new development that would require water supplies. Therefore, there would be **no impact**.
- c) The City of Ferndale provides wastewater treatment services to residents of the City and parcels in the Arlynda Corners area. The City updated its wastewater treatment facility in 2012 so that it now has a maximum capacity of 1.0 million gallons per day with additional storage capacity of 5.0 million gallons per day. The City is now looking at options for upgrading the collection system as it currently has a high rate of inflow and infiltration. The project does not encourage new development within the City which could lead to increased demand on the City's wastewater collection system. Therefore, there would be **no impacts**.
- d,e) Recology Eel River provides solid waste disposal services for the City of Ferndale. Collection services include green waste, recycling, and trash pickup. Solid waste that is not recycled or otherwise diverted is taken to one of two landfills; Anderson Landfill or Dry Creek Landfill. The project will not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The project complies with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, there would be **no impacts**.

²⁶ Humboldt LAFCo, op. cit., pg. 31.

WILDFIRE	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutants from a wildfire or the uncontrolled spread of wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage change?				X

Setting

Wildland fire protection in California is the responsibility of either the State, local, or federal government. A State Responsibility Area (SRA) is a legal term defining the area where the State has financial responsibility for wildland fire protection. Incorporated cities and areas of federal ownership are not included. The prevention and suppression of fires in all areas that are not SRAs are primarily the responsibility of local or federal agencies. Local Responsibility Areas (LRAs) include incorporated cities, cultivated agriculture lands, and portions of the desert. Local responsibility area fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government.

The City is primarily located on flat river plain and is surrounded by mostly open agricultural land. The southern border of the City is forested and some portions are characterized by moderate slopes. The Fire Resource Assessment Program run by CalFire provides assessments for Fire Hazard Severity Zones in both SRA and LRA jurisdictions. According to maps for Humboldt County, much of Ferndale is unzoned, however, the southern portion of the City and minimal portions to the north are designated as Moderate and High Fire Hazard Severity Zones within LRA's²⁷. Beyond the City boundary to the south are SRA's zoned as High Fire Hazard Severity Zones.

²⁷ CalFire, Draft Fire Hazard Severity Zones in LRA, Humboldt County, September 19, 2007.

Discussion

- a) The project will be completed in phases so as to not impair an adopted emergency plan or emergency evacuation plan by ensuring access in the event of an emergency or evacuation. Further, much of the City of Ferndale is unzoned with the southern portion and minimal north portions designated Moderate and High Fire Hazard Severity Zones. Therefore, there will be **no impacts** on wildfire hazards as a result of the Sanitary Sewer Replacement Project.
- b-d) The project does not include site-specific modifications that would expose project occupants to pollutants from a wildfire or the uncontrolled spread of wildfire. Further, the project does not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, or expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage change. As such, there will be **no impacts**.

MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
a) Does the project have the potential to substantially 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, substantially 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?			X	
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.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Discussion

Certain mandatory findings of significance must be made to comply with CEQA Guidelines §15065. The proposed project has been analyzed, and it has been determined that it would not:

- Substantially degrade environmental quality;
- Substantially reduce fish or wildlife habitat;

- Cause a fish or wildlife population to fall below self-sustaining levels;
- Threaten to eliminate a plant or animal community;
- Reduce the numbers or range of a rare, threatened, or endangered species;
- Eliminate important examples of the major periods of California history or pre-history;
- Achieve short term goals to the disadvantage of long-term goals;
- Have environmental effects that will directly or indirectly cause substantial adverse effects on human beings; or
- Have possible environmental effects that are individually limited but cumulatively considerable when viewed in connection with past, current, and reasonably anticipated future projects.

The project has been evaluated in this initial study and determined to have no potentially significant impacts either individually or cumulatively. This is largely because the project will not increase the capacity of the sewer system or the WWTF. The project only seeks to repair and replace existing aging lines to meet current standards. It is not anticipated that there will be any direct or indirect adverse effects on either the environment or human beings.

- a) Potential project related environmental impacts, including impacts to habitat for fish and wildlife species, fish and wildlife populations, plant and animal communities, rare and endangered plants and animal species, and historical and prehistoric resources were evaluated as part of the analysis in this document. See Biological Resources and Cultural Resources Sections for specific discussions supporting this finding. The proposed project would not substantially degrade the quality of the environment and impacts would be **less than significant**.
- b) The project's impacts would not add appreciably to any existing or foreseeable future significant cumulative impact, such as visual quality, historic resources, traffic impacts, or air quality degradation. The project does have the potential to increase surface runoff throughout the City. However, as the project will take place in phases as funding becomes available, and the City is in the process of updating the Drainage Master Plan, these impacts are anticipated to be minimal and accommodate by updated infrastructure over time. As such, potential cumulative impacts would be **less than significant**.
- c) The project is not expected to have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly. Rehabilitation of the aging sanitary sewer system in the City will lead to more efficient operation of the WWTF and will decrease the chance of sewer overflows and/or failures. As such, potential impacts would be **less than significant**.

Appendix A

Mitigation Measures

Mitigation Measure	Description	Reporting Timeline	Responsible Party
AIR-1: Fugitive Dust Control	Standard BMPs to control dust during construction activities will be utilized. Best management practices may include applying water to disturbed soils a minimum of two times per day, covering haul vehicles, replanting any disturbed vegetated areas as soon as practical, restrict vehicle speeds on unpaved roads, and other measures as determined necessary to limit dust.	Prior to and during construction activities	Contractor and Project Engineer
BIO-1: Improvement Area 1 Construction	Improvement Area 1 construction activities will take place during the dry season (typically April-October) and will be re-planted with native vegetation; once the new sewer line is installed the site will be returned to pre-project conditions.	During project construction activities	Contractor and Project Engineer
CUL-1: Inadvertent Discovery of Archaeological Material.	If cultural materials (e.g. chipped or ground stone, historic debris, building foundations, bone) are discovered during ground-disturbance activities, work shall be stopped within 20 meters (66 feet) of the discovery, per the requirements of CEQA. Work near the archaeological finds shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the materials and offered recommendations for further action.	During project construction activities, upon inadvertent discovery.	Contractor and City Representative
CUL-2: Inadvertent Discovery of Human Remains.	If human remains are discovered during project construction, work will stop at the discovery location, within 20 meters (66 feet), and any nearby area reasonably suspected to overlie or be adjacent to human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (Public Resources Code, Section 5097). The coroner will contact the NAHC. The descendants or most	During project construction activities, upon inadvertent discovery	Contractor and City Representative

Mitigation Measure	Description	Reporting Timeline	Responsible Party
	likely descendants of the deceased will be contacted, and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.		
HYD-1 Spill Response:	Spill response materials will be made available on site during Project construction activities. These materials shall include drip pans, buckets, absorbent pads, strawbales, absorbent clay, sawdust, spill containment barriers, heavy plastic sheeting, plastic bags, shovels, and sealable containers, depending on the activities involved.	During project construction activities.	Contractor and Project Engineer
NOI-1 Construction Noise:	Project contractors will utilize the best available noise control techniques when working within the residential areas such as improved mufflers on the equipment. Additionally, all motorized equipment shall not be left idling for excessive periods of time when not in use.	During project construction activities.	Contractor and Project Engineer
TRA-1: Traffic Control Plan	Project contractors will prepare a Traffic Control Plan for any work that will substantially alter traffic flow patterns. The Plan will be submitted to the City and Caltrans (if required for the Main Street sections).	Before construction begins.	Contractor and Project Engineer