

NOTICE OF EXEMPTION

PROJECT TITLE:

Secondary Treatment Upgrades

PROJECT LOCATION:2501 Embarcadero Way, Palo Alto, CA 94303 [APN 008-05-005]. The
project is proposed at the City's Regional Water Quality Control Plant
(RWQCP) located in the eastern Bayshore portion of the City of Palo
Alto (City) in the northern part of Santa Clara County, east of both U.S.
Highway 101 and State Route 82.

PROJECT DESCRIPTION: The Project includes upgrades to the secondary treatment process at the RWQCP to produce treated effluent with reduced total nitrogen content, increase treatment capacity, and rehabilitate aging infrastructure. Upgrades include repairs and minor alterations, replacement or reconstruction, as well as construction and location of a limited number of new small facilities or structures. In general, the Project includes upgrades to the following facilities and systems: Intermediate lift station; Aeration tanks; Low-pressure air blowers and distribution system; Return activated sludge (RAS) system; Waste activated sludge (WAS) system; Power distribution and standby power systems; Instrumentation and Control (I&C) system; Ancillary systems. See attached documentation for further information. See Attachment A for a complete project description.

NAME OF PUBLIC AGENCY APPROVING THE PROJECT:	City of Palo Alto
NAME OF PERSON OR GROUP CARRYING OUT PROJECT:	City of Palo Alto, Public Works Department 2501 Embarcadero Way, Regional Water Quality Control Plant Palo Alto, CA 94303
EXEMPT STATUS	(check one)
	Ministerial (Sec. 21080(b)(1); 15268)
	Declared Emergency (Sec. 21080(b)(3); 15269(a))
	Emergency Project (Sec. 21080(b)(4); 15269(b)(c))

- Categorical Exemption: CEQA Guidelines §15301, 15302 and 15303
- □ Statutory Exemptions.



See Attachment B

PROJECT CONTACT:

REASONS WHY PROJECT IS EXEMPT:

> Tom Kapushinski Senior Engineer, Public Works (650) 617-3130

IF FILED BY APPLICANT:

 Attach certified document of exemption finding.
Declare if a Notice of Exemption has been filed by the public agency approving the project □N/A

for Kapulic Signature (Public Agency)

Senior Engineer, Public Works03/02/21TitleDate



ATTACHMENT A

Nature, Purpose, and Beneficiaries of Project

Background

The City of Palo Alto Department of Public Works (City) owns and operates the Regional Water Quality Control Plant (RWQCP), which receives and treats wastewater from Palo Alto, Mountain View, Los Altos, Stanford University, Los Altos Hills, and East Palo Alto Sanitary District. The plant is permitted to discharge up to 39 million gallons per day (mgd) average dry weather flow (ADWF), average treated flow of 10 mgd, and a wet weather capacity of 80 mgd. Treated effluent from the RWQCP is discharged to San Francisco Bay.

The City of Palo Alto intends to upgrade its existing two-stage secondary treatment system at the RWQCP, which consists of fixed film reactors (FFRs) followed by activated sludge aeration basins. The FFRs were installed at the plant in 1980 as part of the plant's Advanced Wastewater Treatment Process Upgrade to remove ammonia.

Over the years, the FFRs have sustained structural concrete and steel damage and are in need of repairs and retirement. Similarly, many components of the aeration basins, including the mixed liquor suspended solids (MLSS) piping and mixer platforms, the MLSS piping and header supports, the aging blowers and fine bubble diffusers, sluice gates, and mud valves are in need of replacement. The basins are also showing structural concrete damage.

The upgrade of the existing aeration basins to a biological nutrient removal (BNR) system is expected to improve the Plant's process unit reliability, ensure the Plant continues to meet effluent discharge permit limits, establish a path toward meeting potential future nutrient regulatory requirements, and allow for decommissioning of the aging FFR towers. The Project's 2054 basis of design flow is 22.2 mgd which remains far below the permitted flow of 39 mgd.

Overview of Project

A draft Preliminary Design Report has been completed for the Secondary Treatment Upgrades Project (Project).¹ The Project includes upgrades to the secondary treatment process at the RWQCP that are intended to produce treated effluent with reduced total nitrogen content, increase treatment capacity, and rehabilitate aging infrastructure. Upgrades include repairs and minor alterations, replacement or reconstruction, as well as construction and location of a limited number of new small facilities or structures. Figure A1 shows locations of Project elements which are all within the Plant Site. In general, the Project includes upgrades to the following facilities and systems:

- Intermediate lift station
- Aeration tanks
- Low-pressure air blowers and distribution system
- Return activated sludge (RAS) system
- Waste activated sludge (WAS) system
- Power distribution and standby power systems
- Instrumentation and Control (I&C) system
- Ancillary systems



Table A-1 summarizes the various improvements. Some demolition is required for the Project but it will be confined to within existing structures.

Type of Improvement	Improvement			
Paving and Grading	South of blower room			
	Around RAS pump station			
	Around load center (LC)			
Architectural	New canopy structures over RAS Pumping Station 1 and LC-1			
	New flood doors and barriers at existing blower room and equipment room			
Structural (most within existing structure)	Reconstruction of roof deck and addition of dividing wall at intermediate lift station (ILS)			
	Modify aeration tanks by adding elevated			
	channel and baffle walls			
	Addition of an elevated pipe rack around existing			
	aeration tanks			
	Raise floor of blower room			
Structural (new structures)	RAS Pumping Station 1 (elevated slab with steel canopy cover)			
	LC-11 (elevated slab with steel canopy cover)			
	Standby generator (elevated slab)			
	Load bank for standby generators (elevated slab)			
Mechanical	Includes systems associated with the treatment			
	process, heating, ventilation, and air			
	conditioning to protect electrical and I&C			
	equipment, and plumbing for flow drainage in			
	treatment process areas.			
Electrical	Includes upgrades to electrical systems to serve			
	the upgraded secondary treatment process.			

Table A-1. Summary of Project Improvements

Source: Preliminary Design Report, reference 1

REFERENCES

1. Brown and Caldwell. Draft Preliminary Design Report Secondary Treatment Upgrades. Prepared for the City of Palo Alto. June 26, 2020.



ATTACHMENT B

Why Project is Exempt

The City has determined that the Secondary Treatment Upgrade Project is categorically exempt from CEQA under the Class 1 (Existing Facilities); Class 2 (Replacement and Reconstruction); and Class 3(small structures) exemptions as outlined in Article 19 of the CEQA Guidelines.

CEQA Guidelines §15301 reads: Class 1 CEs consist of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or typographical features, invoking negligible or no expansion of existing or former use.

Relevant examples include:

- (b) Existing facilities of both investor and publicly owned utilities used to provide electric power, natural gas, sewerage, or other public utility services...
- (d) Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety, unless it is determined that the damage was substantial and resulted from an environmental hazard such as earthquake, landslide, or flood.
- (e) Additions to existing structures provided that the addition will not result in an increase of more than:
 - (2) 10,000 square feet if:
 - (A) The project is in an area where all public services and facilities are available to allow for maximum development permissible in the General Plan and
 - (B) The area in which the project is located is not environmentally sensitive. CEQA Guidelines 15302 reads:

CEQA Guidelines §15302 reads: consist of replacement or reconstruction of existing structures and facilities where the new structure will be located at the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. An example includes:

(c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.



CEQA Guidelines §15303 reads: Class 3 CEs consist of construction and location of limited numbers of new, small facilities, or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one area to another where only minor modifications are made in the exterior of the structure.

An example includes:

(d) Water main, sewage, electrical, gas, and other utility extensions, including street improvements of reasonable length to serve such construction.

The information herein documents the project's compliance with these exemptions in addition to confirming that no exceptions to the exemptions, as outlined in CEQA Guidelines §15300.2, apply to the project.

Eligibility for Exemptions

The Project is eligible for a Class 1 (15301) exemption because it includes upgrades to the secondary treatment process at the RWQCP which consist of repairs and minor alterations to existing facilities and mechanical equipment. Although it includes an addition to an existing building, that addition is less than 10,000 sf and is located within the disturbed footprint of the existing Regional Water Quality Control Plant, which does not contain any wetlands and is not vegetated and is therefore not environmentally sensitive. The area is served by existing public services and facilities.

Because the project includes replacement or reconstruction of existing structures and facilities, it also qualifies for a Class 2 (Section 15302, Class 2) exemption ¹ Although the project includes a small building addition, this would not increase the capacity of the plant. Dry weather flows have varied from 19 to 20 mgd over the last several years. While the RWQCP is permitted to discharge up to 39 mgd, actual flow increases have not materialized largely due to water conservation efforts and the extended drought. In support of the Project and the need to have a basis of design flow and loadings for design purposes, the City analyzed population growth projections from the six cities and agencies which contribute flow to the Plant, as well as data from the Association of Bay Area Governments (ABAGs) report entitled Plan Bay Area 2040.²

This analysis resulted in a 2054 basis of design flow of 22.2 mgd. The Project will increase the ability of the Plant's secondary system to treat higher flows and loading that is consistent with planned growth in the service area, and provide a higher level of treatment, but will not cause the Plant's permitted flow of 39 mgd to be exceeded.



The project also qualifies for a class 3 exemption in that it includes only one addition to a structure that is less than 10,000 sf on an existing developed site.

Therefore, the project would qualify for a categorical exemption under all three of these exemptions.

Exceptions to the Exemptions

The City is aware that there are six categories or exceptions that preclude the use of Categorical Exemptions, as listed in CEQA Guidelines 15300.2 These categories, followed by the reason(s) the City believes they are not applicable to this project, are as follows:

15300.2(a) Location. Classes 3,4,5,6 and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact may in a particularly sensitive environment

By definition, this exception does not apply to Class 1 and Class 2 Exemptions. This project also qualifies for a class 3 exemption. Although this site is located within the Palo Alto Baylands, the work would occur within the footprint of existing RWQCP disturbance area. This area contains a handful of ornamental trees that are non-native. No native vegetation, wetlands or other features are present; therefore this would not be considered sensitive environment.

15300.2(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The project is a stand-alone, site specific construction project that would not be phased.

15300.2(c) Significant Effect. There are no unusual circumstances creating the possibility that the project will have a significant effect on the environment pursuant to CEQA.

There are no unusual circumstances affecting the project or property such as known archeological or cultural resources or the presence of any wetlands or special status species. Although the project is located within the area of the Palo Alto Baylands, all work would occur within disturbed/developed areas within the footprint of the existing RWQCP. There is nothing unique about the property or the project that would constitute an unusual circumstance. The project complies with zoning and the comprehensive plan.

Although no unusual circumstances exist, the below information nevertheless documents why the project would not result in any significant impacts on the environment and identifies the standard best management practices that the City would implement, as it does for all projects, to ensure compliance with local, state, and federal regulations with respect to the replacement of trees, protection of nesting birds, and protection of unknown archeological, tribal or cultural resources if encountered during construction. These measures will be incorporated into the project design in all contract documents. Because the City intends to apply for funding from the State Water Resources Control Board State Revolving Fund (SRF) Loan Program, compliance with selected CEQA-Plus (federal laws and environmental statutes) requirements is also discussed.

Cultural Resources. A Phase 1 cultural resources evaluation of the Project was completed by Archeo-Tec in September 2020.³ The evaluation focused on the limited excavation activities of the Project and included a



review of documents at the Northwest Information Center at Sonoma State University, consultation with the Native American Heritage Commission and interested Native American representatives, and a pedestrian surface survey of the Project site (Area of Potential Effects [APE]).

The Phase 1 study found no evidence of identified archaeological resources within the APE. Therefore, pursuant to Section 106 of the National Historic Preservation Act, a finding of "no historic properties affected" was made as pertains to archaeological resources.

The Phase 1 study noted the Project would have a relatively small amount of ground disturbance below fill soils and concluded that although the potential for encountering cultural resources (including potential human remains) is remote it cannot be totally discounted. Therefore, the following recommendations from the Phase 1 study have been incorporated into the Project as control measures and will be included in the Contract Documents, resulting in a less than significant impact.

ARCH-1. Construction crew training shall take place and trenching and pile driving spoils shall be spot-monitored (i.e., intermittently inspected) by an on-site archaeologist. Crew training consists of preparation and distribution of an archaeological "Alert Sheet" to construction crews. The Alert Sheet outlines procedures for contacting an archaeologist in the event that unexpected archaeological resources are encountered.

ARCH-2. If an archaeological deposit is found—whether during monitoring or through accidental discovery—it shall be assessed for potential significance. If the archaeologist identifies an intact and potentially significant archaeological resource, he or she shall develop a treatment plan in consultation with the Palo Alto Regional Water Quality Control Plant, the SWRCB, tribal representatives (in the event of a prehistoric site) and the State Historic Preservation Officer (SHPO).

ARCH-3. If human remains are encountered, the following procedures will be implemented:

- a. Per the stipulations of the California Health and Safety Code Section 7050.5(b), the Santa Clara County Medical Examiner's Office will be contacted immediately; this will occur whether or not a Most Likely Descendant has already been appointed.
- b. The Medical Examiner's Office has two working days in which to examine the identified remains. If the Medical Examiner determines that the remains are Native American, then—if a Most Likely Descendant has not yet been appointed—the Office will notify the Native American Heritage Commission (NAHC) within 24 hours.
- c. Following receipt of the Medical Examiner's Office notice, the NAHC will contact a Most Likely Descendant. The Most Likely Descendant then has 48 hours in which they can make



recommendations to the project sponsor and consulting archaeologist regarding the treatment and/or re-interment of the human remains and any associated grave goods.

- d. Appropriate treatment and disposition of the Native American human remains and associated grave goods will be collaboratively determined in consultation between the appointed Most Likely Descendant, the consulting archaeologist, and the landowner or authorized representative. The treatment of human remains may potentially include the preservation, excavation, analysis and/or reburial of those remains and any associated artifacts.
- e. If the remains are determined not to be Native American, the Medical Examiner, archaeological research team, and the project sponsor will develop a procedure for the appropriate study, documentation, and ultimate disposition of the historic human remains.

Air Quality. An air quality technical report was prepared for the Project in October 2020 by William Popenuck.⁴ The air quality analysis included calculation of construction and operational emissions and comparison to significance thresholds. Tables B-1 and B-2 shows their comparison.

As indicated in Table B-1, Project construction period emissions would not exceed Bay Area Air Quality Management District (BAAQMD) annual and average daily significance thresholds, resulting in a less than significant impact. With respect to Federal Clean Air Act General Conformity requirements, construction emissions would be less than the de minimis thresholds and further conformity evaluation is not required. Similarly, as shown in Table B-2, operational emissions associated with the Project's new 2,000 kilowatt (kw) emergency generator are also less than significant, and further conformity evaluation is also not required. In addition, the Project would not have a significant impact with exposure of sensitive receptors to toxic air containments (TACs). There are no sensitive receptors within 1,000 feet of the Project site, and the emergency generator would result in only a minor increase in diesel particulate matter (DPM), a surrogate measure of exposure to the mix of chemicals that make up diesel exhaust as a whole and is classified as a TAC.

Table B-1. Annual and Average Daily Emissions from Project Construction



	Activity							
Year	Days	Activity/Source	ROG	NOx	co	SO2	PM10	PM2.5
		Construction Period Em	issions Per	Year (tons/y	ear)	and the second	$f_{i} = f_{i} + f_{i} + f_{i}$	· 抽《中国· 13
2022	260	Construction Activities	0.111	1.033	1.038	0.002	0.104	0.067
	50	Temporary Diesel Emergency Generator	0.0002	0.018	0.005	0.0003	0.001	0.001
	365	Diesel Generator for Bypass Pump Systems	0.029	3.136	0.950	0.050	0.190	0.142
		Total	0.14	4.19	1.99	0.05	0.30	0.21
2023	138	Construction Activities	0.069	0.429	0.491	0.001	0.039	0.026
	50	Temporary Diesel Emergency Generator	0.0002	0.018	0.005	0.0003	0.001	0.001
	193	Diesel Generator for Bypass Pump Systems	0.015	1.658	0.502	0.027	0.100	0.075
		Total	0.08	2.11	1.00	0.03	0.14	0.10
.23		BAAQMD Thresholds of Significance (tons/year)	10	10		-	15	10
		Exceed Threshold?	No	No	No	No	No	No
		Federal Conformity Threshold (tons/year)	100	100	100	100	•	100
		Exceed Threshold?	No	No	No	No	No	No
		Average Daily Construction	Period Emis	sions (pound	is/day) °			
2022	260	Construction Activities	0.855	7.942	7.988	0.016	0.802	0.518
	50	Temporary Diesel Emergency Generator	0.008	0.720	0.200	0.012	0.040	0.040
	365	Diesel Generator for Bypass Pump Systems	0.159	17.184	5.205	0.274	1.041	0.778
		Total	1.02	25.85	13.39	0.30	1.88	1.34
2023	138	Construction Activities	0.993	6.219	7.114	0.014	0.564	0.378
	50	Temporary Diesel Emergency Generator	0.008	0.720	0.200	0.012	0.040	0.040
	193	Diesel Generator for Bypass Pump Systems	0.155	17.181	5.202	0.280	1.036	0.777
		Total	1.16	24.12	12.52	0.31	1.64	1.20
		BAAQMD Thresholds of Significance (lbs/day)	54	54	-	•	82	54
		Exceed Threshold?	No	No	No	No	No	No

^a Average daily emissions calculated from annual emissions and number of working days for construction activities.

Table B-2. Annual and Average Daily Emissions for New Project 2,000 kW Emergency Generator

Emission Source	Operation Hours	ROG	NOx	со	SO2	PM10	PM2.5
An	nual Generato	r Emissions	- Tons per Y	ear	NR AND AND A	all show the second	
2,000 kW Diesel Emergency Generator	50	0.01	0.59	0.02	0.00	0.00	0.00
BAAQMD Thresholds of Significance (tons	(year)	10	10	STEP STAL	の自然になる	15	10
Exceed Threshold?		No	No	No	No	No	No
Federal Conformity Threshold (tons/year)		100	100	100	100	Serve And	100
Exceed Threshold?		No	No	No	No	No	No
Averag	e Daily Genera	tor Emissio	ns - Pounds	per Day	in Arrender		
2,000 kW Diesel Emergency Generator	50	0.07	3.23	0.08	0.00	0.01	0.01
BAAQMD Thresholds of Significance (lbs/day)	型。但这种包含于20h	54	54		臺灣中國創	82	54
Exceed Threshold?		No	No	No	No	No	No

Source: Air Quality Technical Report, reference 4

Biological Resources. A biological resource Assessment (BRA) for the Project was completed by Environmental Collaborative in October 2020.⁵ The BRA included appropriate database reviews and a site reconnaissance survey of the Project site (APE). Because the APE provides very little in terms of possible wildlife habitat given its developed condition, absence of vegetative cover, and intensity of human development, the BRA



concluded there would be a less than significant impact to special-status species, wildlife movement and no impact to sensitive natural communities and wetlands. The BRA noted, however, that active bird nests could be disrupted in violation of the Federal Migratory Bird Treaty Act and State Fish and Game Code, and several ornamental trees may need to be removed during construction. None of these are of noteworthy size nor are they native or indigenous to the APE. All contract documents will require implementation of the City's standard best management practices for the replacement of trees removed, in compliance with the City's Tree Technical Manual and Chapter 8 of the Palo Alto Municipal Code. In addition, all contract documents will require standard best management practices for the protection of nesting birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. These include:

- **BIO-1.** Ornamental trees removed during construction will be replaced by the City on-site at a minimum ratio of 1:1 using 15-gallon containers as part of replacement landscaping to maintain screening of the RWQCP. Final replacement requirements if any trees are to be removed would be determined by the City.
- **BIO-2.** Adequate measures shall be taken to avoid inadvertent take of bird nests protected under the federal Migratory Bird Treaty Act and State Fish and Game Code when in active use. This shall be accomplished according to the following steps and criteria.
 - If possible, construction shall be scheduled between September 1 and February 28 (inclusive) to avoid the bird nesting season. If Project construction is scheduled during breeding bird season (March 1 to August 31 inclusive), the District or its contractor shall retain a qualified wildlife biologist to conduct a survey for nesting raptors and migratory bird nests within 7 days of the start of construction or after any construction breaks of 14 days or more, within 7 days prior to the resumption of construction.
 - Surveys shall be performed for the Project area and for suitable habitat within 200 feet. If an active nest is discovered, a no-disturbance buffer zone around the nest tree (or, for ground-nesting species, or nests identified on Facility buildings, the nest itself) shall be established by the qualified wildlife biologist. The no-disturbance zone shall be marked with flagging or fencing that is easily identified and avoided by the construction crew, and shall not affect the nesting birds. In general, the minimum buffer zone widths shall be as follows: 100 feet (radius) for non-raptor species and 200 feet (radius) for raptor species; however, the buffer zone widths may be adjusted if an obstruction (such as a building or dense landscaping) is within line-of-sight between the nest and construction. Buffer zone widths and other avoidance measures may be modified by the qualified wildlife biologist based on consultation with the CDFW. Buffer zones shall remain in place as long as the nest is active or young remain in the area and are dependent on the nest.
 - A report of findings shall be prepared by the qualified wildlife biologist and submitted to the District for review and approval prior to initiation of construction during the nesting season (March 1 to August 31). The report shall either confirm absence of any active nests or confirm that any young are located within a designated no-disturbance zone and construction can proceed. No report of findings is required if construction is initiated during the non-nesting



season (September 1 to February 28) and continues uninterrupted according to the above criteria.

 Construction activities that are scheduled to begin outside the breeding season (September 1 through February 28, inclusive) can proceed without surveys. If possible, all necessary tree and vegetation removal shall be conducted before the start of breeding bird season to minimize the opportunity for birds to nest at the Project site and conflict with Project construction activities.

Flooding. The RWQCP is within the 100-year flood hazard area as shown on the Federal Emergency Management Administration (FEMA) flood hazard map where the base flood elevation is 11 feet based on the North American Vertical Datum of 1998 (NAVD88).⁶ Based on the City's Sea Level Rise (SLR) Adoption Policy (approved March 18, 2019) new structures are to be designed to lessen the risks of flooding. Therefore, as provided for in the Preliminary Design Report, new mechanical, electrical, and I&C components will be raised above 14.00 feet.¹ The new pump station and standby generator will be constructed on elevated slabs supported by auger cast piles. In addition, flood doors and barriers will be installed on the existing blower and equipment room to protect these facilities from flooding. Any effect of these structures on redirecting flood flows would be negligible and less than significant. The City may implement additional measures, such as construction of a flood wall, to adapt to SLR above 14.00 feet NAVD88 as a separate future project.

15300.2(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, with a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The project site is not visible from a scenic highway. I-280 and Skyline Blvd (HWY 35) are the only State scenic highways in Palo Alto and they are not visible from the RWQCP.

15300.2(e Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

The City has reviewed the Cortese List on the Envirostor databased to confirm that the project site is not on a list of hazardous waste sites compiled pursuant to Sec 65962.5 of the Government Code.

15300.2(f)Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of an historical resource.

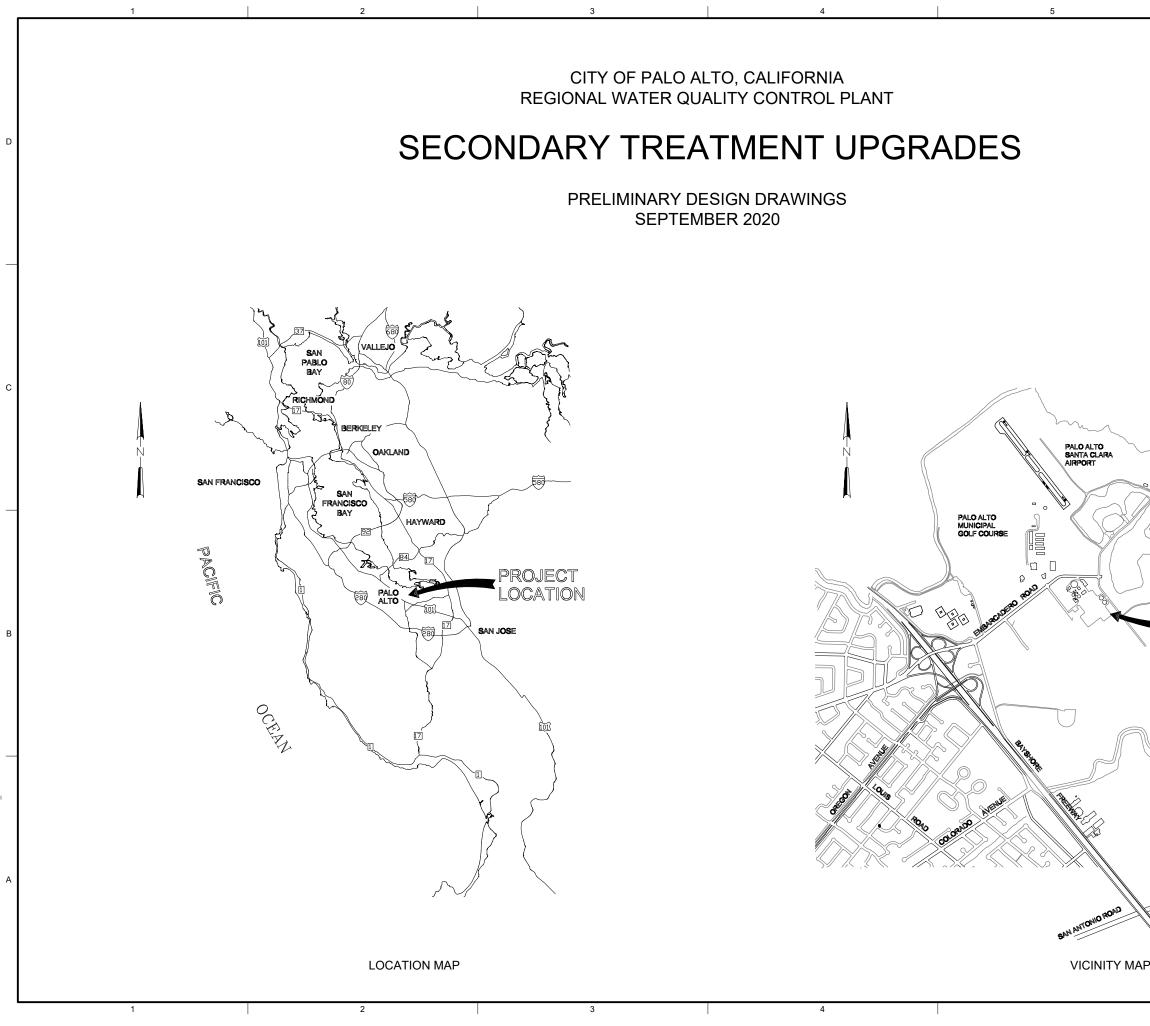
There are no historic resources listed or that are known to be eligible for listing within the project site. Therefore the project would not impact any known historical resources. All work would occur within previously disturbed area; therefore, the City does not anticipate that unknown historic resources would be uncovered during construction. However, the city will follow its standard measures to ensure the protection



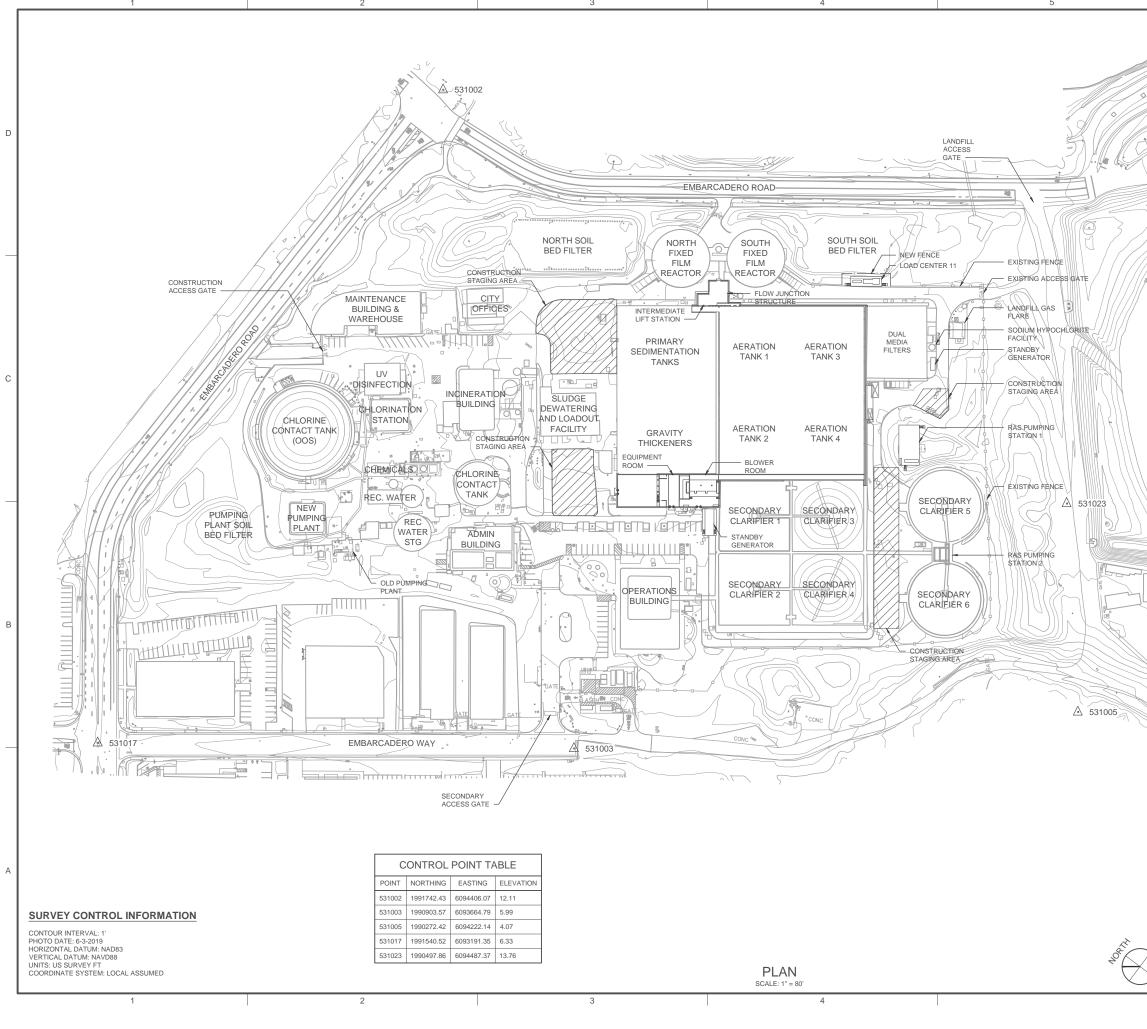
and proper treatment of any unknown historic resources in the event that they are discovered during project construction as discussed above.

REFERENCES

- 1. Brown and Caldwell. Draft Preliminary Design Report Secondary Treatment Upgrades. Prepared for the City of Palo Alto. June 26, 2020.
- 2. ABAG. Plan Bay Area 2040. Adopted July 26, 2017.
- 3. Archeo-Tec. Phase 1 Cultural Resources Evaluation. Palo Alto Secondary Treatment Plant Process Upgrade Project. September 30, 2020.
- 4. William Popenuck. Air Quality Technical Report for the Palo Alto Secondary Treatment Upgrades Project. October 8, 2020.
- 5. Environmental Collaborative. Biological Resource Assessment for the Palo Alto Secondary Treatment Upgrade Project. October 7, 2020.
- 6. Federal Emergency Management Agency. Flood Hazard Map No. 06085C0030H. May 18, 2009.



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	GEI	NERAL NOTES			N	
	1.	CONTRACTOR TO MAINTAIN ACCESS TO ALL PORTIONS OF PLANT FOR PLANT PERSONNEL.			aldwell	
	2.	CONTRACTOR SHALL MAINTAIN EROSION CONTROL MEASURES AT ALL TIMES.				
	3.	STAGING AREA IS FOR CONTRACTOR TO USE FOR TRAILERS AND STORAGE OF MATERIALS. CONTRACTOR IS RESPONSIBLE FOR SURFACING, SECURITY, AND EROSION AND SEDIMENTATION CONTROL OF STAGING AREA.			201 North Civic Drive alnut Creek, CA, 94596	
	4. 5.	CONTRACTOR'S EMPLOYEES SHALL NOT PARK IN AREAS ON THE PLANT GROUNDS, EXCEPT IN THE STAGING AREA. CONTRACTOR SHALL ACQUIRE ADDITIONAL PARKING AREA OFFSITE, IF NECESSARY. CONTRACTOR SHALL NOT STORE MATERIAL OR EQUIPMENT IN AREAS OF THE PLANT GROUNDS, EXCEPT IN THE STAGING AREA. CONTRACTOR SHALL ACQUIRE				D
	6.	ADDITIONAL STORAGE AREA OFFSITE IF NECESSARY. EROSION CONTROL AND TREE PROTECTION MEASURES SHALL BE INSTALLED PRIOR TO ANY OTHER CONSTRUCTION ACTIVITY AND SHALL BE MAINTAINED				
	7.	UNTIL PERMANENT GROUND COVER IS ESTABLISHED. CONTRACTOR IS RESPONSIBLE FOR MAINTAINING ALL EROSION CONTROL MEASURE INSTALL FOR THE FULL DURATION OF THIS CONTRACT.				
	8.	CONTRACTOR SHALL SUPPLY AND MAINTAIN ALL EROSION CONTROL MEASURES NEEDED TO PREVENT ANY MATERIAL FROM LEAVING THE SITE DURING RECONSTRUCTION OF THE ROADWAYS.				
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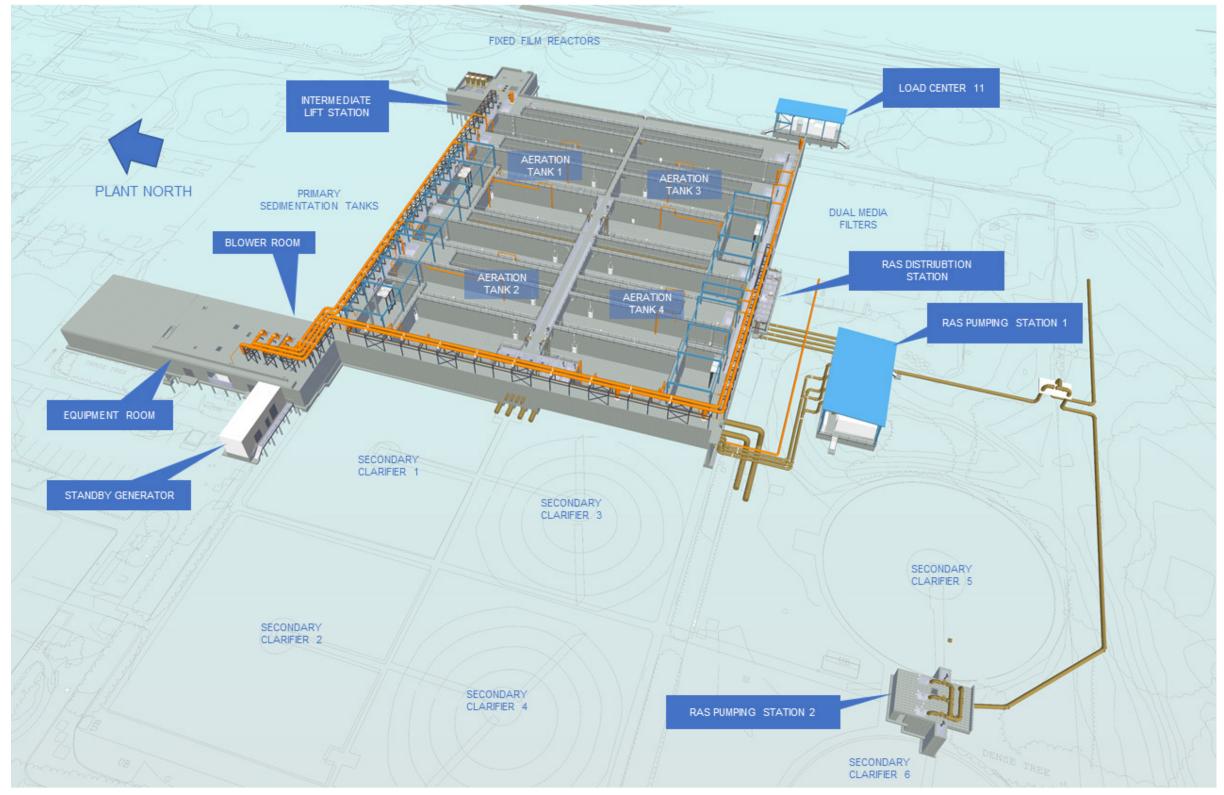


Figure 1-1. Rendering of project

