

MEMORANDUM

DATE: December 20, 2024

To: Anne Girtz, Senior Engineer, West Yost Associates

FROM: Dena Giacomini, Associate/Senior Environmental Planner, LSA
Ashley Honer, Environmental Planner, LSA

SUBJECT: California Environmental Quality Act Categorical Exemptions for the Proposed Sewer Repair and Rehabilitation Project for the Graton Community Services District in Graton, California

LSA is pleased to submit this memorandum in consideration of a Class 1 and Class 2 Categorical Exemption for the proposed Sewer Repair and Rehabilitation Project (Project) for the Graton Community Services District (District) in Graton, California.

INTRODUCTION

The District has identified deficiencies in the existing sanitary sewer network and proposes to conduct repairs and rehabilitation to repair the existing sewer collection system (refer to Figure 1). The District is located west of Santa Rosa, bounded by Sebastopol to the south, Occidental to the west and Forestville to the north. The District provides sewer collection, treatment, and disposal services to approximately 1,600 residents in Graton. The existing Graton wastewater system is owned and operated by the District. Most of the system was constructed in 1976, meaning it is approximately 50 years old. The Project seeks to rectify deteriorated and failing infrastructure, thereby enhancing the system's reliability and minimizing the potential risk of sanitary sewer overflows. The Project would not expand the District's sewer infrastructure but would update existing pipelines to meet the current infrastructure design standards and public health and safety standards.

PROJECT DESCRIPTION

The Project includes various replacement and repairs to the existing wastewater collection system including, repairs at one existing lift station, replacement of one existing lift station, repairs of approximately 3.6 miles of existing sewer pipelines and associated manholes, replacement of approximately 0.70 miles of existing sewer pipelines and associated manholes, rehabilitation at the existing headworks influent channel, and installing approximately 0.33 miles of redundant pipeline adjacent to an existing sewer line for additional reliability of the system (refer to Figure 2). The repairs or replacement of existing pipelines would require excavation to a depth of between 5 and 10 feet below ground surface (varies based on pipeline location). The new 8-inch PVC or HDPE redundant pipeline would be installed parallel to the existing 8-inch force main which serves the District's primary lift station. Currently, the District's lift station #1 only has one force main and no

bypassing capability which does not allow that force main to be taken out of service for inspection or repairs, or to bypass the force main in case of a break. Installation the new pipeline would require excavation to a depth of 5 feet below ground surface. Lift station #2 is in poor condition and requires full replacement. The existing headworks influent channel is in poor condition and requires application of a rehabilitation liner to extend the life of concrete elements.

The majority of construction would occur on existing paved roadways that are within public rights-of-way or on a bike path within the Town of Graton, with no tree removal or vegetation clearing required. Some additional construction would occur within the footprint of the WWTP. Construction activities would result in the disturbance of approximately 13,000 cubic yards of soil. Excavated soil would be placed along the trench alignment and replaced as each section is repaired. The existing pipelines that require repairs are believed to be asbestos cement (AC) material, based on best available information. AC pipeline would be replaced with 6, 8, and 12-inch polyvinyl chloride (PVC) pipes, with no increase in capacity. The Project would also include repaving of the existing roads and bike path to restore them to preconstruction conditions. Land uses in the vicinity of the Project site primarily include residential, agricultural, industrial, and commercial uses. The Project construction period is dependent on available grant funding from the California Clean Water State Revolving Fund grant. The soonest construction would begin is in the Spring of 2026. The total construction period would occur over a 12-to-21-months.

To ensure full protection of nesting birds within the area, Project Features will be included prior to construction activities. These Project Features include a pre-construction nesting bird survey if construction occurs within nesting bird season (February 1 through September 15) to which a qualified biologist will provide appropriate avoidance protocols and establish buffer zones and setback distances based on applicable CDFW and USFWS guidelines for any avian species found on or near the Project area.

Although cultural and historic resources in the area would not be impacted by the Project and most ground disturbance would occur in previously disturbed roadways, additional Project features will be implemented for an inadvertent discovery of archaeological deposits and/or human remains. If archaeological deposits or human remains are discovered construction activities would stop and a qualified archaeologist will be contacted and provide avoidance protocols and next steps for maintaining the finds and to provide federal, State and local compliance protocols.

CALIFORNIA ENVIRONMENTAL QUALITY ACT, SECTION 15301, CLASS 1 EXISTING FACILITIES EXEMPTION

Under *State California Environmental Quality Act (CEQA) Guidelines* Section 15301, a Class 1 exemption is applicable to projects that consist of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use beyond that existing at the time of the lead agency's determination. The Project would closely align with *State CEQA Guidelines* Section 15301(b) and (d):

(b) Existing facilities of both investor and publicly-owned utilities used to provide electric power, natural gas, sewerage, or other public utility services; and

(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.

The Project involves various repairs to the existing wastewater collection system, including two lift stations, approximately 4.3 miles of existing sewer pipelines and associated manholes, and installing approximately 0.33 miles of redundant pipeline adjacent to an existing sewer line to enhance system reliability. Repairs or replacement of the existing pipelines would require excavation to a depth of between 5 and 10 feet below ground surface.

As a wastewater utility provider, the District owns and operates the wastewater collection system as part of its public facilities. The proposed repairs and replacement are essential to maintaining a reliable wastewater system for the residents of Graton. The improvements represent a minor alteration of existing facilities, aimed at resolving current sewer issues without expansion beyond the existing condition to correct a sewer problem.

The Project would be consistent with the current sewer capacity and would be accommodated by the existing infrastructure. The Project would serve the same purpose and function as the District's current utility infrastructure and would involve no expansion of use beyond the District's existing utility framework.

Therefore, given the Project components and the scope of work, the Project qualifies for an exemption under *State CEQA Guidelines* Section 15301.

CALIFORNIA ENVIRONMENTAL QUALITY ACT, SECTION 15302, CLASS 2 REPLACEMENT OR RECONSTRUCTION EXEMPTION

Under *State California Environmental Quality Act (CEQA) Guidelines* Section 15302, a Class 2 exemption is applicable to projects that consist of the replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. The Project would closely align with *State CEQA Guidelines* Section 15302(c):

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

Similar to a Class 1 exemption, the Project would be consistent with the capacity and use of the current wastewater system. The Project would have the same purpose and function as the District's existing utility infrastructure and would involve no expansion of use beyond the District's existing utility infrastructure.

Therefore, based on the Project components and the scope of work, the Project qualifies for an exemption under *State CEQA Guidelines* Section 15302.

CALIFORNIA ENVIRONMENTAL QUALITY ACT CATEGORICAL EXEMPTIONS – EXCEPTIONS

State CEQA Guidelines Section 15300.2 provides exceptions that apply to specific types of projects and/or projects where substantial evidence exists that a project involves unusual circumstances. The exceptions to the Categorical Exemptions pursuant to *State CEQA Guidelines* Section 15300.2 are the following.

- (a) **Location.** Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The Project does not rely on the specific classes of exemptions 3, 4, 5, 6, and 11 called out at the beginning of exception 15300.2(a). However, any exceptions to these outlined exemptions have been thoroughly reviewed and documented, and none of these exceptions apply to the Project.

- (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 includes various repairs to the existing wastewater collection system including, two lift stations, approximately 4.3 miles of existing sewer pipelines and associated manholes, and installing approximately 0.33 miles of redundant pipeline adjacent to an existing sewer line for additional reliability of the system. Future construction of additional utility infrastructure would occur as necessary to maintain the health and safety of the residents of Graton.

The Project would rely on, and be accommodated by, the existing infrastructure associated with the Project site. The Project would not, in and of itself, result in significant environmental impacts. The Project would increase noise and emissions from construction temporarily but would not cause a permanent impact to noise and air quality or contribute to adverse cumulative impacts. The District is responsible for conducting the necessary repairs and upgrades to ensure the reliability of wastewater services for the public. These repairs are crucial for maintaining service reliability and will also enhance environmental protection by preventing hazardous leaks or spills.

- (c) **Significant Effect.** A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The Project includes various repairs to the existing wastewater collection system including, two lift stations, approximately 4.3 miles of existing sewer pipelines and manholes, and installing approximately 0.33 miles of redundant pipeline adjacent to an existing sewer line for additional reliability of the system. The scope of work would be limited to the boundaries of the Project

site. Furthermore, implementation of the Project would not require amendments to an adopted planning document.

The Project activities would occur on existing paved roadways within public rights-of-way and a bike path in an urbanized area in the Town of Graton. According to the Biological Resources Report¹ prepared for the Project, the Project vicinity contains suitable nesting and/or foraging habitat for a variety of avian species. It is anticipated that during nesting bird season, several species may use areas adjacent to the Project for nesting. Construction activities may have the potential to be disturbed resulting in nest abandonment. Adverse effects on the nesting success of raptors, migratory birds, or result in the mortality of individual birds are considered violations of State and federal laws and are considered a potentially significant impact under CEQA.

Implementation of the Project Features outlined in the Project Description would reduce potential impacts to nesting raptors, migratory birds, and special status birds to a less than significant level under CEQA and will ensure compliance with State and federal laws protecting avian species.

Given the nature of the proposed improvements, the developed nature of the Project site and the surrounding area, and its existing function and use, there is no evidence to indicate that the Project would have a significant effect on the environment due to unusual circumstances.

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

Project activities would occur on existing paved roadways within public rights-of-way and a bike path in the Town of Graton. Portions of the Project are located immediately adjacent to State Route 116, which is an officially designated State scenic highway.² However, there are no scenic resources such as trees, historic buildings, rock outcroppings or similar resources within the Project site that would be damaged as a result of the Project. Construction activities may be visible from some portions of State Route 116; however, the change of visual character at the Project site during construction activities would be temporary in nature and would be returned to pre-construction conditions after completion of the Project. Therefore, the Project would not result in impacts to existing scenic highways.

¹ LSA Associates, Inc. 2024. *Biological Resources Assessment Report, Sewer System Repair and Rehabilitation Project, Graton Community Services District, Sonoma County, California*. July.

² California Department of Transportation. 2018. *California State Scenic Highway System Map*. Website: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa> (accessed July 5, 2024).

- (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.

According to the Department of Toxic Substances Control's EnviroStor tool, the Project site is not included on the Department of Toxic Substances Control's Hazardous Waste and Substances Site List or any lists compiled pursuant to Section 65962.5 of the Government Code.¹

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

The Project includes various repairs to the existing wastewater collection system including, two lift stations, approximately 4.3 miles of existing sewer pipelines and manholes, and installing approximately 0.33 miles of redundant pipeline adjacent to an existing sewer line for additional reliability of the system. The repairs or replacement of existing pipelines would require excavation to a depth of between 5 and 10 feet below ground surface. The Project site and area around the Project site are fully developed and have undergone substantial surficial and subsurface disturbance.

According to the Cultural Resources Study completed for the Project², no archaeological resources were identified within the Project site. However, Pleistocene- to Holocene-age terrace deposits are mapped within the northwest portion of the Project site, which have a general potential to contain buried pre-contact archaeological deposits. Therefore, it is possible that Project-related construction could encounter subsurface isolated archaeological resources in the northwest portion of the Project site. However, this potential is limited and does not warrant archaeological monitoring of ground-disturbing activities. Implementation of the Project Features outlined in the Project Description would reduce potential impacts to archaeological resources to a less than significant level under CEQA.

CONCLUSION

In summary, the Project would not result in any specific or general exceptions for the use of a Categorical Exemption as detailed under *State CEQA Guidelines* Sections 15301 and 15302. No potential cumulative impacts or unusual circumstances would occur that may reasonably create an environmental impact. The Project site does not have value as habitat for endangered, rare, or threatened species. The Project would not result in damage to a scenic resource within a highway designated as a State Scenic Highway. Further, the Project site is not on any list compiled pursuant to Section 65962.5 of the Government Code. Therefore, the Project is exempt from the provisions of CEQA as specified by the *State CEQA Guidelines* identified above.

Attachments: A: Figures

¹ California Environmental Protection Agency. 2024. EnviroStor. Website: <https://calepa.ca.gov/sitecleanup/corteselist/> (accessed July 5, 2024).

² LSA Associates, Inc. 2024. *Cultural Resource Study for the Graton CSD Sewer Repair & Rehabilitation Project, Graton, Sonoma County, California LSA Project No. 20241654*. August 1, 2024.

ATTACHMENT A

FIGURES

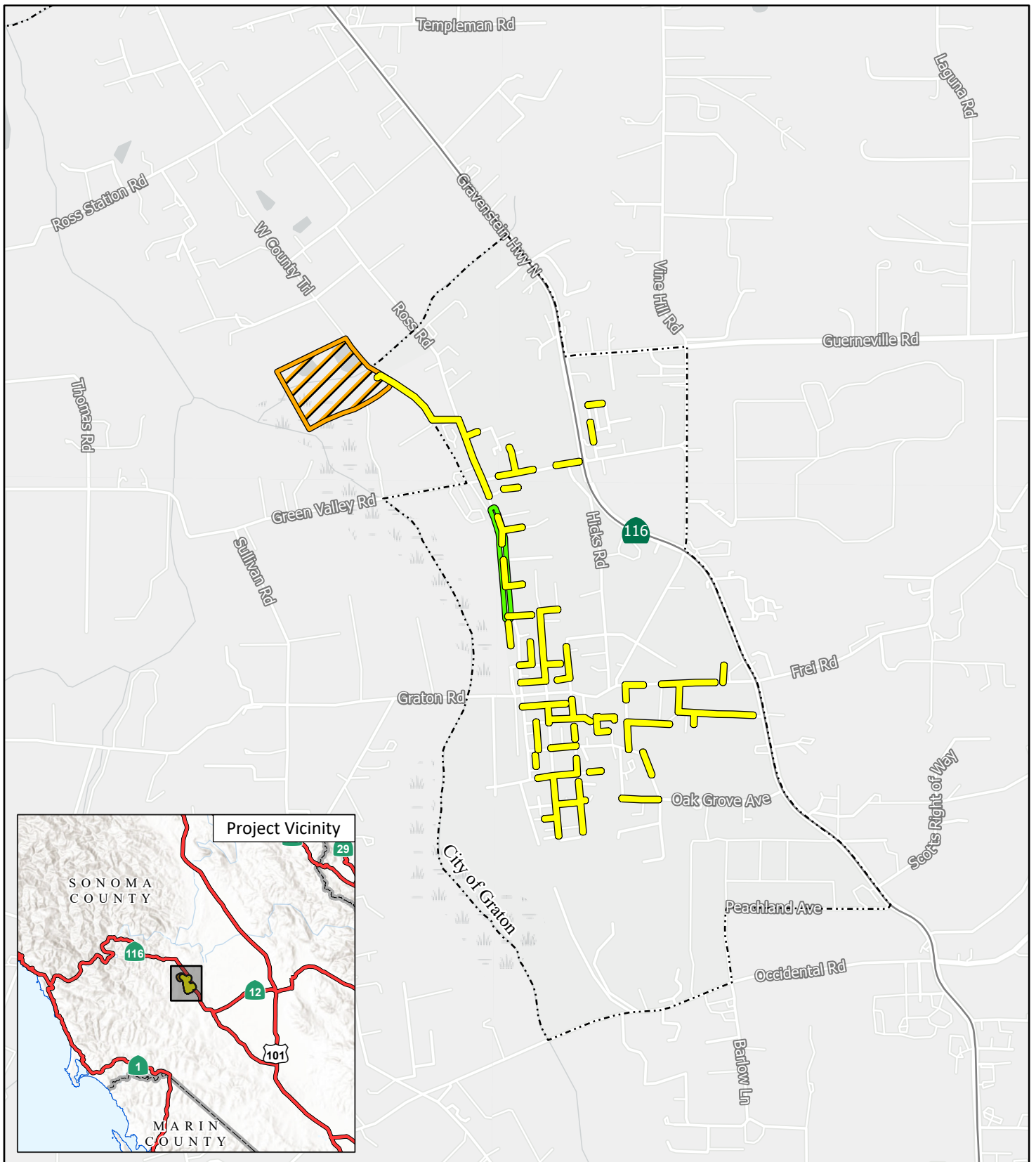




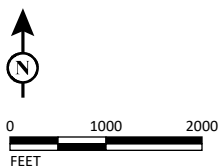


FIGURE 1

LSA

-  City Boundary
- Project Site**
-  Existing Sewer Pipeline
-  Proposed New Sewer Pipeline
-  Existing Graton Community Services District Wastewater Treatment Plant



SOURCE: Esri Light Gray Canvas (2024)

Graton Community Services District,
Sewer Repair and Rehabilitation Project
Project Location and Regional Vicinity

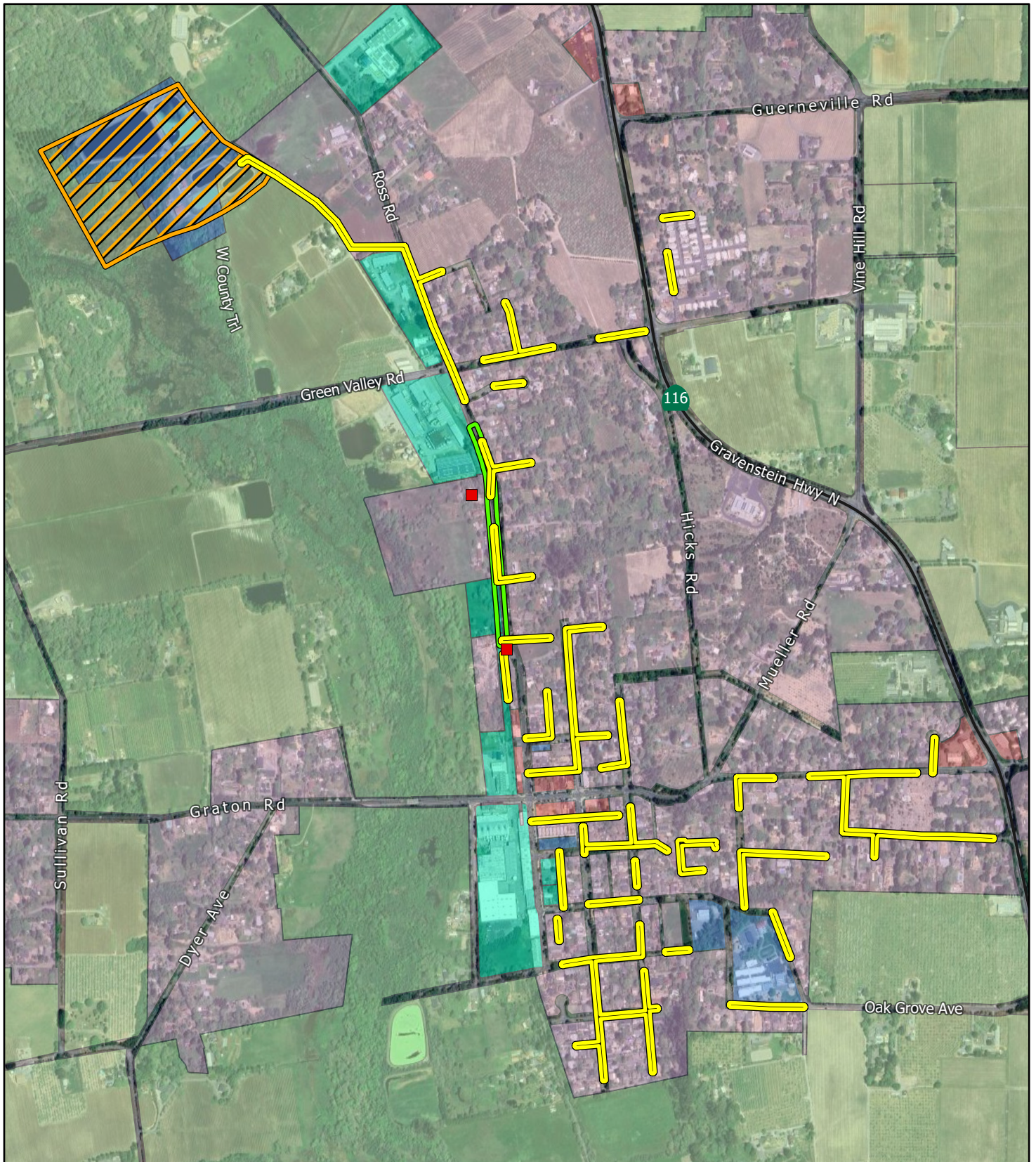
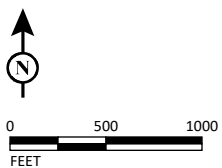


FIGURE 2

LSA

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| ■ Lift Station | Land Use Designation |
| ▭ Project Site | ▭ Agriculture |
| ▭ Existing Sewer Pipeline | ▭ Commercial |
| ▭ Proposed New Sewer Pipeline | ▭ Industrial |
| ▭ Existing Graton Community Services District Wastewater Treatment Plant | ▭ Public Space |
| | ▭ Residential |



SOURCE: Google Maps (2023)

*Graton Community Services District,
Sewer Repair and Rehabilitation Project
Aerial Photograph of the Site
and Surrounding Land Uses*