

INITIAL STUDY/CHECKLIST  
AND NEGATIVE DECLARATION

*Prepared for and by*  
*North Coast Regional*  
*Water Quality Control Board*

**City of Fortuna Wastewater  
Treatment Facility (WWTF)  
180 Dinsmore Drive  
Fortuna, California  
Humboldt County**

Conditional Waiver of Waste Discharge Requirements for  
the Land Application of EQ Classified Biosolids  
Derived Compost Material as a Soil Amendment

February 17, 2011

North Coast Regional Water Quality Control Board  
5550 Skylane Boulevard, Suite A  
Santa Rosa, California 95403

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## INITIAL STUDY/CHECKLIST AND NEGATIVE DECLARATION

This Initial Study/Checklist and Negative Declaration have been prepared in accordance with section 21080(c) of the Public Resources Code and California Code of Regulations, title 14, sections 15070 and 15071. The Negative Declaration is proposed for adoption at a meeting of the California Regional Water Quality Control Board, North Coast Region, on May 5, 2011.

- Project Title:** Conditional Waiver of Waste Discharge Requirements for the land application of Exceptional Quality (EQ) classified biosolids derived compost material as a soil amendment.
- Project Location/Address:** The City of Fortuna, Municipal Wastewater Treatment Facility is located at 180 Dinsmore Drive in Fortuna. The 12 potential agricultural land application sites are located outside of the City of Fortuna boundary within Humboldt County as identified on Figure 1, Land Application Sites.
- Lead Agency:** California Regional Water Quality Control Board, North Coast Region, 5550 Skylane Boulevard, Suite A, Santa Rosa, CA 95403
- Decision Making Body:** California Regional Water Quality Control Board, North Coast Region
- Project Applicant:** City of Fortuna Municipal Wastewater Treatment Plant, 108 Dinsmore Drive, Fortuna, California 95540.

**Project Description:** The Initial Study is being prepared for the regulatory action of issuances of a Conditional Waiver of Waste Discharge Requirements by the California Regional Water Quality Control Board, North Coast Region (Regional Water Board) to the City of Fortuna for the land application of Exceptional Quality (EQ) classified biosolids derived compost material as a soil amendment. implementation of the August 2010, City of Fortuna Wastewater Treatment Facility (WWTF) Biosolids Management Plan (BMP). The BMP serves as the technical report portion of the Report of Waste Discharge for the project and describes how biosolids originating from the treatment of wastewater will be treated, handled, stored, sampled, and re-used as a soil amendment.

Biosolids are defined as sewage sludge that has been treated and tested and shown to be capable of being beneficially and legally used as a soil amendment for agriculture, silviculture, horticulture, and land reclamation activities. The appropriate treatment, storage and application procedures, including land application, is regulated under Title

40 of the Code of Federal Regulations, Part 503 (40 CFR 503), *Standards for the Use or Disposal of Sewage Sludge*, by the U.S. Environmental Protection Agency (EPA).

As per the Management Plan, sewage sludge removed during the wastewater treatment process begins the treatment process at the anaerobic digester. Microorganisms within the digester break down the sewage sludge's biodegradable material in the absence of oxygen. The sludge is anaerobically digested for a period of at least 30 days wherein the organic matter in the sludge is stabilized, pathogens and odors are reduced and the total quantity of sludge is reduced through the conversion of the volatile solids fraction into biogas. The produced digestate, which contains stabilized solids and available forms of nutrients, is then sent to the belt filter press where the water content is reduced. The belt filter press is housed in an enclosed building with odor control bio-filtration. All removed water is directed back to the headworks of the WWTF for treatment. On-site, covered sludge drying beds may also be utilized for the dewatering of digestate at times when the belt filter press is inoperable. The covered sludge drying beds have a storage capacity of 2,000 cubic yards and are designed to drain back to the WWTF headworks.

In addition to the sewage sludge removed during the wastewater treatment process, sewage sludge accumulating on the bottom of the flow equalization ponds will also be addressed. Equalization pond sludge will air dry in place during the dry-weather season. The dried sludge will then be removed from the equalization ponds and gradually blended into the de-watered digestate exiting the belt filter press. Following dewatering and blending activities, the digestate will be sampled to confirm that metals concentrations are below the limits cited in Table 3 of 40 CFR 503, a requirement of the designation of Exceptional Quality (EQ) biosolids.

Upon confirmation of EQ classification metals concentrations, the de-watered and anaerobically digested sludge will be mechanically mixed with green waste and composted in windrows for the purpose of meeting 40 CFR 503 Class A Biosolids pathogen reduction and vector attraction requirements. During composting activities a composting log will be kept to document and record daily time and temperature readings and the turning frequency of the compost windrows. The compost material will then be screened for green waste larger than ¾" diameter, and the final product will be analyzed for nitrate, ammonia, organic nitrogen, total solids percentage and specific gravity for the purpose of calculating the Plant Available Nitrogen (PAN) concentration. The sampling method and number of samples to be collected are based on the U.S. EPA Biosolids Reference Sheet, Section 2.4 Biosolids Sampling Guidance for Publically Owned Treatment Works.

Composting activities, including storage, will typically take place in an enclosed, 16,425 square foot building equipped with an odor control system. During dry weather periods, composting activities may take place outside of the compost facility on an adjoining asphalt paved area. The designated asphalt area will have the necessary infrastructure in place to contain any potential drainage on-site. In addition to the composting facility,

the EQ biosolids derived compost material may be stored in one of the on-site, covered, sludge drying beds pending its use as a soil amendment.

The processing of dewatered digestate into EQ biosolids derived compost material will be done on a quarterly basis. On average approximately 262.5 cubic yards will be produced every three months, resulting in a total of 1,050 cubic yards per year.

As per the Management Plan, the City of Fortuna will beneficially use the processed EQ biosolids derived compost material in one of the following methods:

- As a bulk soil amendment applied by the City to agricultural lands; or
- As a bulk or bagged soil amendment received and applied by ratepayers served by the City of Fortuna WWTF to their private yards; or
- As a bulk or bagged soil amendment to be marketed by a commercial fertilizer enterprise.

The application of EQ biosolids derived compost materials to agricultural lands as a soil amendment will take place at agronomic rates. The nitrogen up take rate of the crop to be grown and the background concentration of nitrogen in site soils will be compared to the plant available nitrogen (PAN) concentration of the EQ biosolids derived compost material. The purpose of this application method is to encourage the complete uptake of nutrients by the crop and to minimize the migration of nutrients beyond the root zone possibly resulting in an impact to groundwater. An Agronomic Rate Calculation Worksheet will be utilized by City of Fortuna WWTF staff to determine the number of acres needed for a particular land application event.

The Management Plan has identified twelve (12) potential sites for land application. They are documented in Figure 1, *Land Application Sites*. The total estimated usable acreage provided by these twelve sites is 278.24 acres, providing greater than four times the area needed annually for land application at current WWTF biosolids generation rates. EQ biosolids derived compost materials will not be applied to a single site two years in a row so as to avoid any potential for over-application of nutrients. An agreement between the land owner and the City will be signed prior to beginning land application activities.

All land application sites will be located on agricultural lands in Humboldt County. The sites will be located on stable geologic formations not typically subject to flooding or excessive run-off from adjacent parcels. Land application will not take place on slopes exceeding 10% or on sites where the depth to groundwater is less than or equal to four (4) feet below ground surface (bgs). Land application site areas will meet all of the following setbacks:

- 5 feet from property lines
- 200 feet from domestic water supply wells
- 100 feet from non-domestic water supply wells
- 50 feet from occupied onsite residences

- 20 feet from centerline of public roads where fields are fenced and 50 feet from centerline of public roads where fields are not fenced
- 100 feet from surface waters, including wetlands, creeks, ponds, lakes, underground aqueducts, and marshes
- 33 feet from primary agricultural drainage ways
- 100 feet from occupied non-agricultural buildings and off-site residences
- 400 feet from a domestic water supply reservoir
- 200 feet from a primary tributary to a domestic water supply
- 2,500 feet from any domestic surface water supply intake

Land application activities will be conducted by City staff and will include transportation to the application site via City owned dump truck, mowing of the application site, spreading of EQ biosolids derived mixture using a trailer manure spreader, disking in of the material to a depth of approximately six (6) inches, and re-seeding the pasture or field. The storage of EQ biosolids derived compost materials at the application site is prohibited except in unforeseen emergency events such as equipment failure or operator injury. In such instances when a forecast of rain is being predicted City staff will cover the compost material with 10ml visqueen and sandbags to prevent possible runoff and leaching. Land application activities are to take place during periods of dry, calm weather when wind speeds are less than 25 miles per hour.

The City will notify Regional Water Board staff one month in advance of any land application event to allow for scheduling of an inspection. The City will notify by mail all property owners or tenants located adjacent to the land application site prior to implementation of land application activities. A summary of the Management Plan and a copy of the Conditional Waiver will be posted on the City's website.

In accordance with the Management Plan, the City may also release EQ biosolids derived compost material to City of Fortuna WWTF ratepayers for use as a bulk or bagged soil amendment. Ratepayers will be limited in the amount of material they may receive. A Yard Application Table based on agronomic nitrogen rates will be used to determine the maximum cubic yards available to each ratepayer. The Yard Application Table calculates the cubic yards of EQ biosolids derived compost material allowed per individual ratepayer based on the nutrient content, percent solids and bulk density of the compost material, and the nitrogen uptake rate of a standard grass lawn.

In addition, the City may release EQ biosolids derived compost material to a commercial fertilizer enterprise that is interested in marketing the material in bulk, or packaged (bagged) in small quantities for resale. In accordance with 40 CFR Part 503, biosolids derived materials meeting EQ requirements may be utilized as any other type of commercial fertilizer or soil amendment.

The City of Fortuna WWTF is currently registered as an official compost facility with Humboldt County, the Local Enforcement Agency (LEA), and is subject to routine quarterly inspections. The City is required to submit an annual report to the U.S. EPA

and the Regional Water Board by February 19<sup>th</sup> of each year. The report includes information on biosolids processing and handling activities along with monitoring and nutrient loading rate data.

The proposed Draft Conditional Waiver of Waste Discharge Requirements and Draft Monitoring and Reporting Program are attached to this Initial Study.

**Environmental Setting:** Activities covered by this Waiver will take place at the City of Fortuna WWTF located at 180 Dinsmore Drive, in Fortuna; on private yards of ratepayers served by the WWTF; and on agricultural lands located outside the City boundaries as identified on Figure 1, *Land Application Sites*.

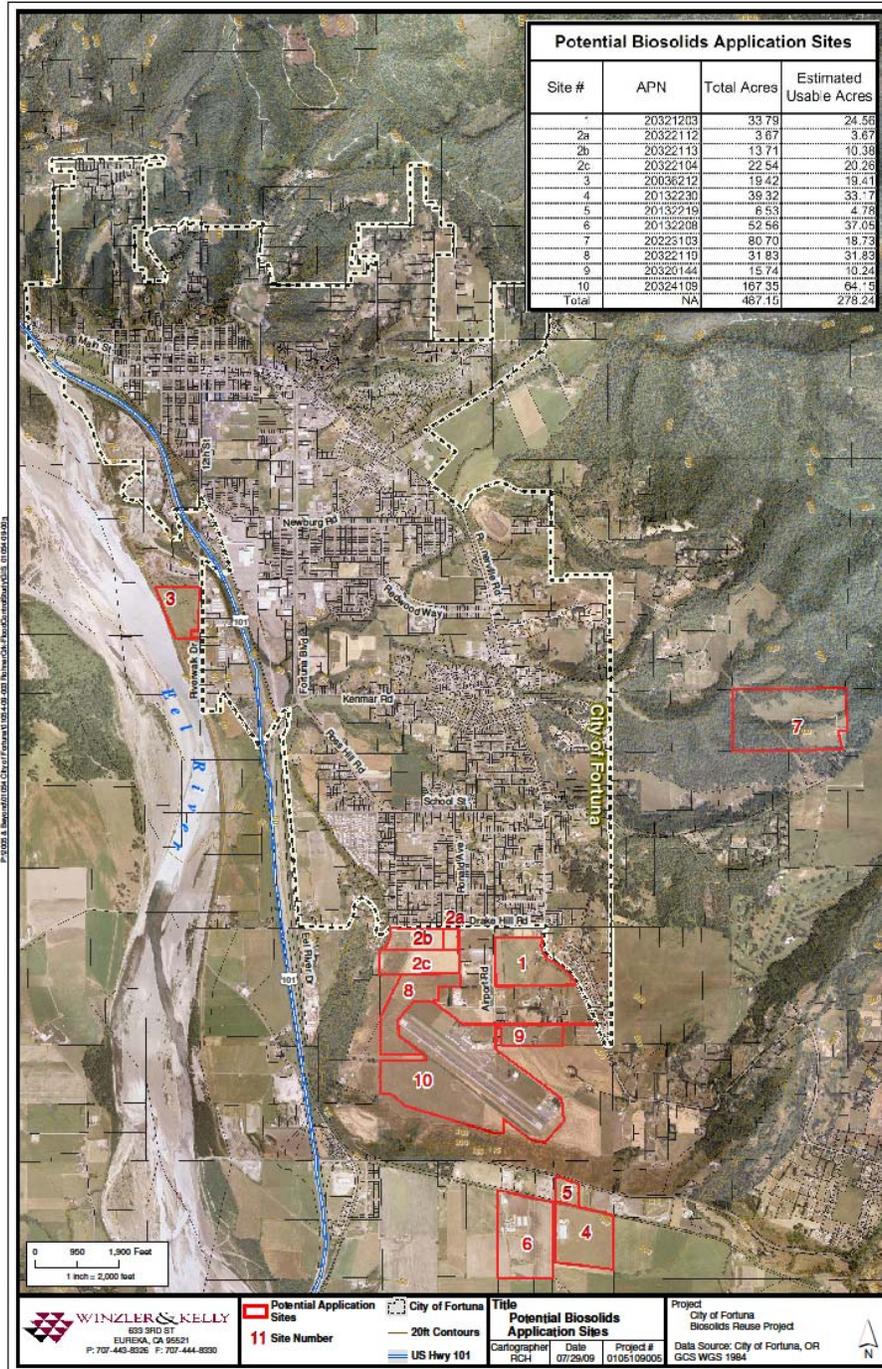
The City of Fortuna is located in the Eel River Valley area of Humboldt County, California, approximately 253 miles north of San Francisco and 20 miles south of Eureka. The city is an urbanized community consisting of several commercial corridors and industrial areas, suburban residential neighborhoods, and outlying rural-residential, agricultural and timber areas. It is generally bounded by slopes and forests to the north and east, agricultural land and State Highway 36 to the south, and U.S. 101 and the Eel River to the west.

**Discussion of Potential Effects of Proposed Project:** The California Environmental Quality Act (CEQA) requires a Lead Agency to prepare an Initial Study to determine whether a project may have a significant effect on the environment (California Code of Regulations (CCR), title 14, section 15063(a)). A "significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CCR 14, section 15382). If the Initial Study does not show that there is substantial evidence, in light of the whole record before the agency, that a project may have a significant effect on the environment, a Negative Declaration may be prepared.

The Initial Study Environmental Checklist has not identified the potential for a "significant effect on the environment" resulting from activities covered under the Regional Water Board Conditional Waiver for the City of Fortuna Municipal Wastewater Treatment Facility (WWTF) Implementation of Biosolids Management Plan therefore a Negative Declaration has been prepared. Please see the attached Checklist for additional information on potential environmental effects.

**Initial Study/Checklist:** The Initial Study/Checklist is attached. For more information call Rachel Prat at (707) 576-2542.

**Figure 1. Land Application Sites**



**APPENDIX A**

### INITIAL STUDY/ENVIRONMENTAL CHECKLIST

1. **Project title:** Conditional Waiver of Waste Discharge Requirements for the land application of Exceptional Quality (EQ) classified biosolids derived compost material as a soil amendment.
2. **Lead agency name and address:**  
California Regional Water Quality Control Board, North Coast Region (Regional Board) 5550 Skylane Blvd., Santa Rosa, CA 95403
3. **Preparer and phone number:** Rachel Prat, (707) 576-2542
4. **Project location:** The City of Fortuna, Municipal Wastewater Treatment Facility is located at 180 Dinsmore Drive in Fortuna. The 12 potential agricultural land application sites are located outside of the City of Fortuna boundary within Humboldt County as identified on Figure 1, *Land Application Sites*.
5. **Project sponsor's name and address:**  
City of Fortuna  
Municipal Wastewater Treatment Facility  
180 Dinsmore Dr. / P.O. Box 545  
Fortuna, CA 95540  
**Attn: Mr. Dennis Ryan, City Engineer**
6. **General Plan Designation:**  
Agriculture Exclusive, Timber  
Production, Industrial General and  
Public Facilities
7. **Zoning:**  
Agriculture Exclusive, Timber  
Production, Heavy Industrial and Airport
8. **Brief Description of project:** The project includes the land application of Exceptional Quality (EQ) classified biosolids derived compost material as a soil amendment to agricultural lands as described in the City of Fortuna WWTF August 2010 Biosolids Management Plan (Management Plan).
9. **Surrounding land uses and setting:** Surrounding land uses include agriculture, timber production, airfields and landing strips, industrial, and urban uses. Activities covered by the Waiver will take place within Fortuna City limits and on agricultural lands identified on Figure 1, *Land Application Sites*.
10. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.)

This project does not preclude the need to obtain permits which may be required by other local, state and federal governmental agencies.

### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors marked below would be potentially affected by this project, as indicated by the checklist on the following pages.

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

### DETERMINATION (Completed by the Regional Water Board as the Lead Agency)

On the basis of this initial study:

- 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.

Original Signed by Catherine Kuhlman

Signature

February 17, 2011

Date

## EVALUATION OF ENVIRONMENTAL IMPACTS

- 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 Section XVII, "Earlier Analyses," 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. (California Code of Regulations, title 14 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.

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

a-d) The land application of EQ biosolids derived compost material will take place on lands utilized for agricultural purposes including the cultivation and harvesting of animal feed crops and the grazing of livestock. The land application activities covered by the Waiver are equivalent to standard agricultural practices currently taking place on these parcels including the application of fertilizer, the tilling of soil, and the mowing, harvesting and/or grazing of a crop. Land application activities will be short in duration and will take place only once a year. Land application activities will not take place on any one application site two years in a row. Because the activities covered by the Waiver are short in duration and will occur at a maximum once every two years at any one land application site and because the activities are considered typical agricultural activities that are presently taking place on the designated land application sites the covered activities will not result in an aesthetic impact beyond what is already taking place. The land application activities covered by the Waiver will not have a substantial effect on a scenic vista, damage a scenic vista, degrade the existing visual character or quality of the site and its surroundings or create a new source of substantial light or glare, which would adversely affect day or nighttime views; therefore, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>II. AGRICULTURE RESOURCES:</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. 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) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				X

a-c) Activities covered by the Waiver will not involve conversion or re-zoning of agricultural land to non-agricultural use. There will be no change to agricultural resources in the project area over existing conditions; therefore, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY</b> -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				X

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				X
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				X
d) Expose sensitive receptors to substantial pollutant concentrations?				X
e) Create objectionable odors affecting a substantial number of people?				X

a-e) Activities covered by the Waiver will not conflict with or obstruct implementation of an air quality plan, violate an air quality standard or contribute to an air quality violation, result in a cumulative considerable net increase of a criteria pollutant, expose sensitive receptors to substantial pollutant concentrations or create objectionable odors affecting a substantial number of people. The Management Plan, includes measures to control the emission of dust and odors during land application activities including the requirement that applications be scheduled during times of calm weather conditions with windy weather conditions being avoided. Onsite wind conditions will be monitored during times of land application. Measurements will be taken with a hand held anemometer and will be recorded on two hour intervals. If wind speed at the application site exceeds 25 miles per hour, the land application operation will be halted until conditions improve. Records of the onsite wind speed measurements will be included with the biosolids annual report to be submitted to the Regional Water Quality Control Board. The EQ biosolids used in the compost mixture will have undergone vector attraction reduction requirements in accordance with U.S. EPA's Biosolids Rule (40 CFR Part 503) resulting in a reduction in odors. Following land application of the compost mixture to the cropland the mixture will be disked into site soils further reducing the potential for odors. In addition, the Waiver requires the City of Fortuna to comply with all applicable local, state, and federal regulations, which includes the Clean Air Act as well as the air quality standards established by the California Air Resources Board and the local Air Pollution Control Districts.

Because potential impacts to air quality from odors are addressed in the City of Fortuna BMP as stated above, and the Waiver requires compliance with all local, state, and federal regulations, including the Clean Air Act and applicable state air quality standards, activities covered by the Waiver are not expected to have an impact on air quality, and therefore, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES --</b> 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 Department of Fish and Game or U.S. Fish and Wildlife Service?				<b>X</b>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				<b>X</b>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				<b>X</b>
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?				<b>X</b>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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

- a) Activities covered by the Waiver will not result in a substantial adverse effect, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Land application activities covered by the waiver will take place on lands currently utilized for agricultural purposes including the cultivation and harvesting of animal feed crops. Activities covered by the Waiver are similar to standard land management activities such as applying fertilizers for increased crop production, disking or tilling soil for planting crops, and the harvesting or grazing of crops. The application of the EQ biosolids derived compost material will not result in any impacts above what would be expected from the implementation of typical agricultural land/crop management activities; therefore the appropriate finding is **no impact**.
- b) Activities covered by the Waiver will not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local and regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service. Activities covered by the Waiver will not take place within 100 feet of surface waters, or within 33 feet of primary agricultural drainage ways where riparian habitat would likely be located, thus the appropriate finding is **no impact**.
- c) The activities covered by the Waiver will not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. A wetland delineation will be conducted on all land application sites prior to application of the EQ biosolids derived compost material to confirm that setback requirements to wetlands as required under the Waiver are being met. Because activities covered by the Waiver will not take place within 100 feet of federally protected wetlands the appropriate finding is **no impact**.

- d) The activities covered by the Waiver will not interfere substantially with the movement of any native resident or migratory fish, wildlife species, established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; therefore the appropriate finding is **no impact**.
- e-f) The Waiver does not preclude the City of Fortuna from the need to comply with applicable local, state or federal laws and regulations; therefore, the appropriate finding is **no impact**.

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

- a-d) Land application activities covered under the Waiver will take place on agricultural lands utilized for the production of crops and will include the mowing of grass crops, the spreading of EQ biosolids derived compost material with a manure spreader, the disking in of the material to a depth of approximately six (6) inches and the reseeded of the crop. These activities will not result in a substantial adverse change of a historical, archaeological, paleontological, or unique geologic feature. These activities are unlikely to impact any human remains interred outside of a cemetery due to the application sites being disturbed previously during routine agricultural activities including the tiling of soils and ground disturbance measures covered under the Waiver are to occur at a depth of only six (6) inches. Because the project does not involve these factors, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>VI. GEOLOGY AND SOILS</b> -- Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				<b>X</b>
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.				<b>X</b>
ii) Strong seismic ground shaking?				<b>X</b>
iii) Seismic-related ground failure, including liquefaction?				<b>X</b>
iv) Landslides?				<b>X</b>
b) Result in substantial soil erosion or the loss of topsoil?				<b>X</b>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				<b>X</b>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				<b>X</b>
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?				<b>X</b>

- a i-iii) Land application activities covered by the Waiver are typical of standard agricultural practices including the application of fertilizer, the tilling of soil, and the mowing, harvesting and/or grazing of a crop. These activities will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, or seismic-related ground failure, including liquefaction. Because the project does not involve these factors, the appropriate finding is **no impact**.
- a iv) Land application activities covered by the Waiver are typical of standard agricultural practices including the application of fertilizer, the tilling of soil, and the mowing, harvesting and/or grazing of a crop. These activities will not change the exposure of people or structures to potential substantial adverse effects involving landslides, therefore, the appropriate finding is **no impact**.
- b) Land application sites will be located on stable geologic formations with slopes of less than 10% that are not typically subject to flooding or excessive run-off from adjacent parcels. All land application activities will take place during periods of dry, calm weather when wind speeds are less than 25 miles per hour. The required setbacks to property lines, agricultural drainage ways, and surface water will act as buffer zones for potential soil erosion pathways. In addition, the re-seeding of the cover crop following land application activities will allow stabilization of site soils through the growth of a crop and the crop's roots. Because the activities covered by the Waiver will not cause substantial soil erosion or result in the loss of top soil; the appropriate finding is **no impact**.
- c) Land application activities covered by the Waiver are typical of standard agricultural practices and will take place on agricultural lands that are located on stable geologic formations with slopes of less than 10%. Such activities will not result in the creation of new unstable areas either on- or off-site due to physical changes in a hill slope affecting the mass balance, material strength, or hydrology of the slope; therefore the appropriate finding is **no impact**
- d) Land application activities covered under the Waiver do not include projects such as building construction that are subject to the Uniform Building Code. Because the project does not involve this element, the appropriate finding is **no impact**.
- e) Land application activities covered under the waiver do not involve septic tanks or alternative wastewater disposal systems. Because the project does not involve these elements, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>VII. GREENHOUSE GAS EMISSIONS:</b> 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

- a) Land application activities covered under the Waiver will not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The land application of biosolids will reduce greenhouse gas emissions through the retention of carbon in soil for long periods of time and the removal from the atmospheric carbon cycle. The use of biosolids in place of a commercial fertilizer will further reduce greenhouse gas emission by saving fuel needed to mine and manufacture the commercial product; therefore the appropriate finding is **no impact**.
- b) Land application activities covered under the Waiver will not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases; therefore, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS:</b> 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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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
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 for people residing or working in the project area?				X
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X

- a) The land application of EQ biosolids derived compost material will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Biosolids are defined as treated municipal sewage sludge that has been tested and shown to be capable of being beneficially and legally used as a soil amendment for agriculture, silviculture, horticulture, and land reclamation activities as specified under the Code of Federal Regulations title 40 Part 503<sup>1</sup>, *Standards for the Use or Disposal of Sewage Sludge* (40 CFR Part 503). EQ classified biosolids meet the metals standards, Class A pathogen reduction standards, and vector attraction reduction standards contained in 40 CFR Subpart 503.13 (Table 3), 40 CFR Subpart 503.32, and 40 CFR Subpart 503.33, respectively and are not considered hazardous waste. The appropriate finding is **no impact**.
- b) Land application of EQ classified biosolids derived compost material will not 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; therefore, the appropriate finding is **no impact**.
- c) Land application activities covered under the Waiver will not result in the emission or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; therefore, the appropriate finding is **no impact**.
- d) Land application activities covered under the Waiver will not take place on sites that are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; therefore, the appropriate finding is **no impact**.
- e-f) Land application activities covered under the Waiver will not result in a change over current conditions related to activities near an airport or airstrip that would result in a safety hazard; therefore, the appropriate finding is **no impact**.
- g) Land application activities covered under the Waiver will not interfere with an emergency evacuation or response plan; therefore, the appropriate finding is **no impact**.
- h) Land application activities covered under the Waiver will not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. The appropriate finding is **no impact**.

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<sup>1</sup> All further statutory references are to title 40 Part 503 of the Code of Federal Regulations unless otherwise indicated.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				X
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X
j) Inundation by seiche, tsunami, or mudflow?				X

- a) The land application activities are required to comply with the Conditional Waiver of Waste Discharge Requirements for the City of Fortuna Municipal Wastewater Treatment Facility (WWTF) for the land application of Exceptional Quality (EQ) classified derived compost material as a soil amendment. The proposed Draft Conditional Waiver of Waste Discharge Requirements and Draft Monitoring and Reporting Program are attached to this Initial Study. The Waiver requires the application of EQ biosolids derived compost materials as a soil amendment to occur at agronomic rates. The purpose of this application method is to encourage the complete uptake of nutrients by the crop or landscape plants being grown and to minimize the migration of nutrients beyond the root zone possibly resulting in an impact to groundwater. In addition, the Waiver requires that application to agricultural lands not take place in areas where groundwater is 4 feet or less below ground surface, further reducing any potential impact to groundwaters. The Waiver includes other restrictions and requirements for the use of EQ classified biosolids derived compost materials to agricultural lands including but not limited to the following; the need to meet setbacks to water supply wells (200 feet to domestic water supply wells & 100 feet to non-domestic water supply), surface waters (400 feet from a domestic water supply reservoir, 200 feet from a primary tributary to a domestic water supply & 2,500 feet from any domestic surface water supply intake) and 33 feet from primary agricultural drainage ways .

Compliance with the Waiver will not result in violation of any water quality standards or waste discharge requirements; therefore, the appropriate finding is **no impact**.

- b) The Waiver does not authorize activities that could substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The appropriate finding is **no impact**.

- c) Activities covered under the Waiver will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. Activities covered by the Waiver will not take place within 100 feet of surface waters, or within 33 feet of primary agricultural drainage ways. Therefore the appropriate finding is **no impact**.
- d) Activities covered under the Waiver will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Activities covered by the Waiver will not take place within 100 feet of surface waters, or within 33 feet of primary agricultural drainage ways. The activities include the mowing of grass crops, the spreading of EQ biosolids derived compost material with a manure spreader, the disking in of the material to a depth of approximately six (6) inches and the reseeding of the crop. These activities may in fact decrease the amount of surface water runoff due to the potential of improved surface water percolation and retention of the soil from the incorporation of the biosolids derived compost material. Therefore the appropriate finding is **no impact**.
- e) Land application activities covered under the Waiver will not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. The land application activities may in fact decrease the amount of surface water runoff due to the potential of improved surface water percolation and retention of the soil from the incorporation of the biosolids derived compost material. In addition, a 100 foot buffer from surface waters and a 33 foot buffer from primary agricultural drainage ways is required at all areas of EQ biosolids derived compost material application. Therefore the appropriate finding is **no impact**.
- g, h) Land application activities covered under the Waiver do not authorize placement of housing or structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Because the project does not involve this element, the appropriate finding is **no impact**.
- i) Land application activities covered under the Waiver will not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; therefore, the appropriate finding is **no impact**.
- j) Land application activities covered under the Waiver will not cause inundation by seiche, tsunami, or mudflow; therefore, the appropriate finding is **no impact**.

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

- a) Land application activities covered under the Waiver will not divide an established community; therefore the appropriate finding is **no impact**.
- b) Land application activities covered under the Waiver must comply with all applicable local, state and federal regulations, which include land use plans, policies, or regulations of an agency with jurisdiction over the project. There will not, therefore, be any conflict and there is **no impact**.
- c) Land application activities covered under the Waiver will not conflict with any applicable conservation plan or natural community conservation plan therefore the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XI. MINERAL RESOURCES</b> -- 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?				<b>X</b>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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

a-b) Land application activities covered under the Waiver do not authorize mining activities or other activities that could affect mineral resources. The land application of EQ biosolids derived compost material will take place on lands utilized for agricultural purposes including the cultivation and harvesting of animal feed crops and the grazing of livestock. The land application activities covered by the Waiver are equivalent to standard agricultural practices currently taking place on these parcels including the application of fertilizer, the tilling of soil, and the mowing, harvesting and/or grazing of a crop. These activities will not result in the loss of availability of a locally important mineral resource; therefore, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XII. NOISE:</b> Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				X
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				X
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				X

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	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 expose people residing or working in the project area to excessive noise levels?				X
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X

- a) Land application activities covered under the Waiver will take place on lands designated for agriculture use. The land application activities covered by the Waiver including mowing, spreading of compost material, disking in of the compost material and reseeded of the crop will be accomplished with the use of standard farming equipment. Noise associated with the use of farming equipment on designated agricultural lands will not result in the exposure of persons to or the generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; therefore the appropriate finding is **no impact**.
- b) Land application activities covered under the Waiver will not result in the exposure of persons to or the generation of excessive groundborne vibration or groundborne noise levels; therefore the appropriate finding is **no impact**.
- c) Land application activities covered under the Waiver will not result in a substantial permanent increase in ambient noise levels in the project vicinity above existing levels. The land application activities covered will be short in duration and will occur at a maximum once every two years at any one land application site. Activities will take place on lands currently utilized for agricultural purposes and will include the mowing of grass crops, the spreading of EQ biosolids derived compost material with a manure spreader, the disking in of the material and the reseeded of the crop. These activities are equivalent to standard agricultural activities currently taking place at the application sites; therefore the appropriate finding is **no impact**.
- d) Activities covered under the Waiver may result in localized increased noise levels. Such increased noise levels would likely be associated with farming equipment operation associated with the land application of biosolids, including

the use of the manure spreader and the disking in of the EQ biosolids derived compost material. These impacts would be temporary and not considered to be a significant impact. Any such temporary impact would be similar to that currently taking place on agricultural lands from farming equipment and would not result in a substantial temporary or periodic increase in ambient noise levels above existing noise levels. Therefore the appropriate finding is **no impact**.

- e-f) Land application activities covered under the Waiver will not result in the exposure of people residing or working in the project area to excessive noise levels. Therefore, the appropriate finding is **no impact**.

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

- a-c) Land application activities covered under the Waiver do not involve construction of new homes, businesses, or infrastructure. The project would not displace people or existing housing. Because the proposed project does not involve these elements, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XIV. PUBLIC SERVICES</b>				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?				X
Police protection?				X
Schools?				X
Parks?				X
Other public facilities?				X

- a) Land application activities covered under the Waiver do not involve new or physically altered government facilities. Because the proposed project does not involve these elements, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XV. RECREATION --</b>				
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

- a) Land application activities covered under the Waiver will not cause an increase in 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 therefore, the appropriate finding is **no impact**.
- b) Land application activities covered under the Waiver will not involve increasing the use of recreational facilities; therefore, the appropriate finding is **no impact**.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				X

- a-b) Land application activities covered under the Waiver will not cause an increase in traffic or exceed the level of service standard established by the county congestion management agency for designated roads or highways; therefore the appropriate finding is **no impact**.
- c) Land application activities covered under the Waiver do not involve air traffic. Because the proposed project does not involve this element, the appropriate finding is **no impact**.
- d) Land application activities covered under the Waiver will not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Land application activities will take place on lands utilized for agricultural purposes including the cultivation and harvesting of animal feed crops and the grazing of livestock. The land application activities covered by the Waiver are equivalent to standard agricultural practices currently taking place on these parcels including the application of fertilizer, the tilling of soil, and the mowing, harvesting and/or grazing of a crop. Because the activities do not involve installation of hazardous design features or incompatible uses the appropriate finding is **no impact**.
- e-f) Land application activities covered under the Waiver will take place on lands utilized for agricultural purposes and will not affect emergency access or parking capacity; therefore, the appropriate finding is **no impact**.
- g) Land application activities covered under the Waiver do not involve alternative transportation. Because the land application activities do not involve this element, the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XVII. UTILITIES AND SERVICE SYSTEMS</b> Would the project:				

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

a-c) Land application activities covered under the Waiver do not involve the expansion or construction of wastewater or storm water treatment facilities. Because land application activities do not involve expansion or construction of wastewater or storm water treatment facilities, the appropriate finding is **no impact**.

- d) Land application activities covered under the Waiver do not authorize the development of new water supplies or change the need for existing water supplies. Because land application activities do not involve the development of new water supplies or the change in existing water supplies, the appropriate finding is **no impact**.
- e) Land application activities covered under the Waiver pertain to the use of EQ biosolids derived compost material as a soil amendment on agricultural lands. These land application activities do not affect the existing treatment capacity of City of Fortuna’s WWTF; therefore the appropriate finding is **no impact**.
- f) Land application activities covered under the Waiver pertain to the use of EQ biosolids derived compost material as a soil amendment on agricultural lands. These activities will not require the service of a landfill for solid waste disposal needs; therefore, the appropriate finding is **no impact**.
- g) Land application activities covered under the Waiver comply with federal, state, and local statutes and regulations related to solid waste, therefore the appropriate finding is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XVIII. MANDATORY FINDINGS OF SIGNIFICANCE --</b>				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				<b>X</b>
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)?				<b>X</b>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X

- a) Activities covered by the Waiver will not have the potential to degrade the quality of the environment, reduce the habitat of fish or wildlife species, cause their population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history. The appropriate finding is **no impact**.
- b) The Regional Board determines that activities conducted in compliance with the Waiver will not adversely, individually, or cumulatively affect the quality or the beneficial uses of the waters of the State. The environmental protection afforded by the adoption of the Waiver, including the implementation of the BMP, will provide sufficient controls on any potential impacts. The appropriate finding is **no impact**.
- c) The Regional Board determines that the implementation of the activities covered by the Waiver will not cause substantial adverse effects on human beings, either directly or indirectly; therefore, the appropriate finding is **less than significant**.