Final Notice and Public Explanation of a Proposed Activity in a Wetland

To: All interested Agencies, Groups and Individuals:

This is to give notice that the City of Arcata has conducted an evaluation as required by Executive Orders 11988 and 11990, and as implemented by U.S. Department of Housing and Urban (HUD) Regulations found at 24 CFR 55.20, to determine the potential effect that its activity in the floodplain and wetland will have on the human environment, for the proposed Arcata Wastewater Treatment Facility Upgrades Project under contract number 17-CDBG-12017. HUD has allocated Community Development Block Grant funds for the acquisition and installation of UV equipment, which would be dispersed through the City of Arcata as the Responsible Entity for the proposed project; therefore, the City of Arcata is the Lead Agency for National Environmental Policy Act (NEPA) review

There are three primary purposes for this notice. First, people who may be affected by activities in wetlands and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important public educational tool. The dissemination of information about wetlands can facilitate and enhance Federal efforts to reduce the risks associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in wetlands, it must inform those who may be put at greater or continued risk.

The Proposed Project will rehabilitate the City's existing wastewater treatment facility located at 601 G Street in Arcata, Humboldt County, California. Arcata's Wastewater Treatment Facility (Facility) is located within the Arcata Marsh and Wildlife Sanctuary, and utilizes innovative treatment methods using treatment ponds within the marsh area. The City of Arcata is proposing to replace a portion of existing Facility infrastructure and upgrade several components as part of the Arcata Wastewater Treatment Facility Improvement Project. The work includes installation of buried pipe for the flow reconfiguration of disinfected enhancement wetlands effluent, installing a discharge pipe into a constructed brackish marsh at the north end of the Arcata Bay section of Humboldt Bay (future outfall discharge point), relocation of the electrical equipment building in the Facility to allow for improved road access for fire and emergency services (requiring installation of a new utility service line), installing a new ultraviolet light disinfection system, and constructing a mitigation wetland area. For a full description of proposed activities, visit the City's Facility Upgrades page at: https://www.cityofarcata.org/856/Wastewater-Treatment-Facilities-Improvem

The Facility is located in the "AE" Flood zone, which has an annual 1% probability of flooding. Additionally, the project scope includes the installation of a new discharge pipe for treated effluent into an existing Brackish Marsh, which was constructed as part of the McDaniel Slough Restoration Project with the express intent of treating discharged wastewater. The Final Wetland Delineation identified the Outfall area as containing 0.23 acres of freshwater emergent wetland, a portion of which may be permanently impacted by the project (Stillwater Sciences Final Delineation of Waters and Wetlands, August 2020). This wetland area is subject to Section 404 of the Clean Water Act and thus under USACE-

jurisdiction as well as State- and LCP-jurisdiction. The Early Notice and Public Review of Proposed Activities in 100-Year Floodplain and Mapped Wetland Area, published July 8, 2020, shared the current available data at the time, which assumed 0.1 acres of wetland in the area of the Brackish Marsh may be affected (Stillwater Sciences Preliminary Delineation of Waters and Wetlands, April 2020). The final 8-Step Analysis and assumptions noted herein reviewed project effects and alternatives using the final calculated wetlands acreage of 0.23 acres.

The City of Arcata has considered the following alternatives and mitigation measures to be taken to minimize adverse impacts and to restore and preserve natural and beneficial values:

Locate the Project Outside of the Floodplain and Wetland (Offsite Alternative): The project's intent is to rehabilitate and improve the existing system, and a full relocation would not fit these parameters. This objective is based on both the logistic and economic and time constrained infeasibility of a full relocation of the facility. Arcata is a small community of less than 20,000 inhabitants, roughly half of which are students; the cost of a full relocation has been estimated at up to $150 million by the City engineer. There are only a handful of parcels within City limits that could house such a large facility, and the majority of them are already developed. In addition, many of the suitable industrially-zoned parcels in the northern portion of the City are subject to inundation in the case of a catastrophic failure of Matthew's Dam at Ruth Lake. Suitably large parcels in the southern or eastern portion of Arcata would likely require conversion of prime agricultural lands, and would remain located in the Coastal Zone with similar impacts and permit processes.

No Action Alternative: The project purpose and need would not be met with the No Action alternative. The No Action alternative assumes that no new upgrades to the existing facility would occur. In the absence of these upgrades, the Facility will remain out of compliance with the requirements of the NPDES permit and the quality of treated effluent discharged into Humboldt Bay will not be addressed, which has the potential to result in a variety of negative effects to humans and wildlife. The City's continued ability to utilize the Treatment Facility relies on undertaking the improvements discussed in this environmental assessment.

Onsite configuration Alternatives (includes Preferred Alternative): Four alternatives augmenting the existing facility treatment system were developed in the prepared Facility Plan (Carollo Engineers, 2017) to address improvements needed for the AWTF. The four alternatives included common improvements, including actions to reduce flood risk, vegetation maintenance, and ultraviolet disinfection, among others. A full list of common improvements can be found in the 8-Step Analysis, which can be viewed at City Hall or online at the link listed at the end of this Notice.

Alternatives were conceived through a collaboration between City staff, LACO Associates, Carollo Engineers, and the community through public discussions in a series of public workshops. The City and consultants (LACO Associates and Carollo Engineers) determined the five criteria that were important for the project and ranked each project. The five criteria were: meets permit requirements; ease of operation and maintenance; constructability; reliability; and ammonia removal.

Alternative 1 was the least expensive alternative, however it received the lowest scores for meeting permit requirements, constructability, reliability and ammonia removal. Alternative 2 provides an additional secondary treatment system that will provide BOD treatment and meet ammonia and nitrogen limits. Alternative 2 is the second most expensive alternative and received

low ranking regarding the non-economic criteria. The low ranking was due to Alternative 2 requiring the most project elements. This would increase the difficulty of operating and maintaining the treatment processes and facilities. Alternative 3 constructs an additional secondary treatment system with a larger capacity than Alternative 2 because less treatment will occur in the natural system, Alternative 3 requires less construction and maintenance than Alternative 2. Alternative 3 was the highest scoring alternative for the non-economic criteria. It achieved high rankings in reliability and ammonia removal due to the larger treatment capacity of the oxidation ditches compared to Alternative 2.

Alternative 4 (Preferred Alternative) was developed after the first three alternatives were presented to the Regional Water Quality Control Board (Water Board). The Water Board found that these three alternatives would not achieve the requirements of the permit. Alternatives 1, 2 and 3 did not provide the peak wet weather flow capacity (5.9 mgd) to pass through the Enhancement Wetlands. This is not in compliance with the Enclosed Bays and Estuaries Policy. Alternative 4 allows a peak pumped flow of 5.9 mgd at Outfall-003 to utilize the Enhancement Wetlands for additional treatment and meet the discharge requirements.

It has been determined that the Preferred Alternative would provide improved water treatment for the existing City population, and would address rehabilitation needs of critical city infrastructure. While the Preferred Alternative would change the elevation of the floodplain in the vicinity of the proposed project, it would not change the occupancy of the floodplain and would not have effects on flood velocities upstream or downstream. Once implemented, the improved levee system will be designed to withstand storm surge velocities and wave action for the 100-year-storm event. The Preferred Alternative would therefore minimize the potential effects that could be expected to occur within the floodplain and further mitigation or compliance measures will not be required. While there would be adverse effects to regulated wetlands resulting from construction of the proposed project, the Preferred Alternative would not significantly adversely affect wetland resources in the area and all permanently affect wetlands will be mitigated onsite at a minimum 1:1 ratio, in compliance with state and local wetland protection procedures. Furthermore, the project area is already developed and the treatment facility is pre-existing; implementation of the Preferred Alternative would not encourage further new development within the floodplain or wetlands in the proposed project area.

The City of Arcata has reevaluated the alternatives to building in the wetland and has determined that it has no practicable alternative. Therefore, the City determines that the proposed project complies with EOs 11988 and 11990, and 44 CFR 60.3. Environmental files that document compliance with steps 3 through 6 of EO 11988 are available for public review with the Community Development Department, located at Arcata City Hall at 736 F Street, Arcata CA, (707) 822-5955, and may be examined or copied on weekdays between 11:00 AM and 5:00 PM. The documents may also be found at:
https://www.cityofarcata.org/856/Wastewater-Treatment-Facilities-Improvem

PUBLIC COMMENTS

Pursuant to 24 CFR Part 55, an Early Notice and Public Review of a Proposed Activity in a 100-Year Floodplain and Wetland, was published on July 8, 2020. Publication of this notice was followed by a 28 day comment period, in which one public comment was received. The comment was from a partner agency and did not substantively address the proposed use of federal funds to support the construction of the proposed project in a floodplain and / or

wetland, but primarily requested further information related to project impacts to fish and wildlife, which will be further analyzed in the project's Environmental Assessment. These comments will be included as an appendix to the Final Environmental Assessment.

All interested persons, groups and agencies are invited to submit written comments to the Community Development Department of the City of Arcata regarding the proposed use of federal funds to support the construction of the proposed project in a floodplain and / or wetland, at the following email address: comdev@cityofarcata.org or the address listed above. The Community Development Department will consider all comments received by close of business on September 24, 2020.