

# **Proposed Finding of No Significant Impact** Inflow and Infiltration Repair Project City of Fort Bragg, California

**Finding:** After review of the Environmental Assessment/Initial Study (EA/IS) and information received during the public comment period EPA has determined that the proposed City of Fort Bragg Inflow and Infiltration Repair Project will not have a significant impact on the human environment and that further National Environmental Policy Act documentation is not required. To ensure that potential adverse impacts which may occur during construction are minimized, the mitigation measures identified in the EA/IS and referenced below (Environmental Consequences and Conditions) will be required as conditions of EPA project funding.

**Approved:** 

Wayne Nastri, Regional Administrator

Date:

# **Project Background and Purpose:**

The original City of Fort Bragg sewer system was constructed to carry combined storm water and sanitary sewage. In the late 1970's the combined system was converted to a "separate" sanitary sewer and storm drain system; however, leaks and remnant direct drainage connections cause excessive inflow and infiltration into the wastewater system during storms. The extra inflow can overwhelm the City's wastewater treatment plant. Further, the interconnections are such that if sewer flows were blocked through flooding, a construction accident, or an earthquake, raw sewage could be discharged into the City's storm drain system into local streams and public ocean beaches.

The proposed project would address these problems by repairing a previously identified 57 crossconnections which account for better than 95% of the total volume of potential cross-connections known to exist. EPA proposes to award a grant of funds to assist the project. Additional funding will come from the California State Water Resources Control Board and through City Municipal Utility district NO. 1.

### **Project Description:**

TheCity of Fort Bragg will excavate 57 sites and take such steps as to eliminate inflow, infiltration, and cross connections. Thirty-two of the 57 sites can be corrected by the City's Department of Public Works Road Maintenance personnel through the use of hand tools, a backhoe, and a dump truck. The other twenty-five locations will require an investigation by a sewer camera and additional smoke testing to locate and isolate. These locations will be treated under an "investigate, design, and construct" subcontract.

Other action alternatives were not evaluated in the EA/IS. Under the no action alternative, Fort Bragg would retain the existing sewer and storm drainage systems and continue to experience the associated strains on the wastewater treatment facility and potential threats to local streams and ocean beaches.

## **Environmental Consequences and Conditions:**

In compliance with the National Environmental Policy Act and California Environmental Quality Act, the lead agencies U.S. Environmental Protection Agency and City of Fort Bragg Municipal Improvement District, have prepared an Environmental Assessment/Initial Study (EA/IS) that analyzes the potential environmental impacts of the proposed project. This analysis supports a Finding of No Significant Impact (FONSI). Most potential adverse impacts are minor and would occur during construction activities over a period of two construction seasons with specific work on a location taking place over an average thirty day period. These impacts can be reduced by a number of mitigation and control measures which are enumerated in the EA/IS and which will be conditions of EPA grant award. Environmental consequences and conditions to mitigate impacts are summarized below; full documentation is available in the EA/IS.

### Air Quality

The project will involve minow excavation in order to expose the suspect storm drain/water lines. As such, the project would be subject to the Mendocino County Air Quality management district regulations concerning fugitive dust emissions, specifically, Regulation 1, Rule 400(a). To mitigate potential impacts the City will incorporate the following measures:

- 1. Enclose, cover, water, or apply soil binders to exposed stock piles.
- 2. Water active construction areas as needed to keep dust from traveling off site.
- 3. Limit dust generating activities during periods of high winds.
- 4. Remove earth tracked off of the construction site at least once daily.

If implemented correctly, the mitigation measures will reduce the amount of fugitive dust emmitted from the project to a level of insignificance.

### Surface water

The project will eliminate cross connections between the City's storm drain and sewer systems resulting in greatly reduced chance of raw sewage being released directly into the Pacific Ocean, or the local rivers. Further, the project will reduce the wet weather peak flow impacts on the City's wastewater treatment plant thus reducing the chance for the City to exceed the maximum wet weather daily flow allowances stipulated in the plant's NPDES permit.

## Ground Water

The project does not entail the expansion of groundcover, simply the replacement of the crossconnections within the existing paved portion of the City right-of way in City streets. There will be not significant impact on local ground water quantity or quality.

#### Important Vegetation

The proposed project would be conducted on paved City Street in existing City right of way. To the extent that tree roots are encountered during construction activities, they will be removed to the minimum extent feasible so that they would not pose a hazard to City facilities. The minimum amount of roots will be removed to ensure to the maximum extent feasible that no detrimental damage occur to any trees adjacent to the work area. As such, the project would have no impact on any vegetation types.

The EA/IS contains a complete list of mitigation practices for these subjects as well as road and railroad traffic during construction, soil stabilization, accidental sewage spills or sewage line breaks, avoiding effects on any hazardous materials sites in the general project area, any cultural resources uncovered during construction, and noise reduction. All mitigation measures are adopted as conditions of Finding of No Significant Impact and subsequent implementation of the project.

#### **Public Review:**

During the 30-day public comment period, the EA/IS is on file and available for public inspection at the following locations:

Fort Bragg City Hall 416 North Franklin Street Fort Bragg, CA 95437

Fort Bragg Public Library 499 Laurel Street Fort Bragg, CA 95437

These documents will also be posted on the EPA Region 9 website at <u>http://www.epa.gov/region09/water/fortbragg</u>.

Comments may be submitted no later than September 6, 2004 to:

Fort Bragg City Hall 416 North Franklin Street Fort Bragg, CA 95437

The EPA contact for this project is:

Ms. Ae-Ran Davis (WTR-3) U.S. EPA Region 9 75 Hawthorne Street San Francisco, CA 94105 Email: davis.ae-ran@epa.gav Fax: 415-947-3537

After EPA and the City of Fort Bragg assess any comments received, those comments, agency responses, and this FONSI will be forwarded to the EPA Regional Administrator for review and signature. If the FONSI is signed by the Regional Administrator, it will be available to any individual upon request.