APPENDIX A: ENVIRONMENTAL QUESTIONNAIRE FOR WIFIA CREDIT ASSISTANCE PROJECTS

This questionnaire will be used for most projects receiving WIFIA credit assistance and supports the Programmatic Environmental Assessment (PEA) "tiering" framework, the PEA's associated preliminary Finding of No Significant Impact (FONSI), and project-specific NEPA documentation for the WIFIA program. WIFIA credit assistance to SRF programs should use the questionnaire in Appendix B.

1. Project title:
   Water Reclamation Facility (WRF) Project

2. Prospective Borrower:

   City of Morro Bay

3. Project description:
   The proposed project would include new wastewater treatment facilities at the WRF site that would produce advanced treated recycled water that meets or exceeds 22 CCR 60001 *et seq.* (Title 22) requirements for IPR. The proposed project would allow the City of Morro Bay ("the City") to meet the State Water Resources Control Board ("SWRCB") requirements and timeline for upgrading to at least full secondary treatment and would exceed this minimal requirement through development of an advanced water treatment facility. The proposed project requires modifications of the existing sewer collection system. All wastewater would flow to one of two new lift stations. One would be located near the existing wastewater treatment plant ("WWTP") site and one will be built near the intersection of Main Street and Highway 1. New offsite conveyance facilities would be built to connect these new lift stations to the proposed WRF site. As part of the proposed project, two new lift stations and new conveyance pipelines would be installed.

   Implementation of the proposed project would allow for the decommissioning of the existing WWTP, once the Cayucos Sanitary District's (CSD's) new and independent wastewater facility is completed and operational. During operation, advanced treated recycled water produced at the WRF would be used for groundwater recharge in the Morro Valley Groundwater Basin using subsurface application via injection wells. A recycled water distribution system would be built to convey water to one of two injection well areas. Project facilities may include, but not be limited to, recycled water conveyance pipeline, a pump station, injection wells and monitoring wells. Brine produced by the treatment process will be discharged through the existing ocean outfall.

4. Project location (briefly describe the surroundings and environment around the project location and attach map, as necessary):

   There are three main components to the project: the onsite WRF improvements, the pump stations and pipelines needed to convey raw wastewater to the onsite facilities and treated effluent and brine back to the existing ocean outfall, and the injection wells used to inject purified water into the Lower Morro Basin. The onsite WRF facilities will be located just north of

Highway 1 at South Bay Boulevard. The conveyance pump stations will be located near the existing WWTP site on Atascadero Road and near the intersection of Main Street and Highway 1. The injection wells will be located in one of two locations in the Lower Morro Basin: either west of Highway 1 or east of Highway 1 near the Narrows. See Attachment 1 that identifies the locations of the major facilities associated with the WRF Project.

5. Project type: (Check all that apply):

☐	Wastewater Projects
☐	Drinking Water Projects
☐	Energy Efficiency Enhancement Projects
☒	Repair, Rehabilitation, and Replacement Projects
☐	Brackish or Seawater Desalination Projects
☒	Drought Prevention, Reduction, or Mitigation Projects
☐	Acquisition of Real Property Projects
☒	A combination of Wastewater or Drinking Water Projects
☐	Other [Please explain]

6. Describe any environmental permits needed for the project (e.g., federal, state, local) and the status of any permit:

   The table below includes a summary of the permits that will be required for the project:

TABLE 2-10
DISCRETIONARY PERMITS POTENTIALLY REQUIRED

Agency	Permits and Authorizations Potentially Required
Regional Water Quality Control Board (RWQCB)	National Pollutant Discharge Elimination System (NPDES) permit for discharge to Pacific Ocean
	Waste Discharge Requirements (WDR) for groundwater recharge under CCR Title 22
State Water Resources Control Board (SWRCB)	WDR
	Water Quality Order No. 2004-0012-DWQ
SWRCB Division of Drinking Water	Existing water supply permit; GRRP Title 22 Engineering Report
California Coastal Commission	Coastal Development Permit
Local Agency Formation Commission (LAFCO) San Luis Obispo	Resolution of Determination for City annexation
County of San Luis Obispo	Coastal Development Permit; Development Plan
City of Morro Bay	General Plan/LCP Amendment; Coastal Development Permit; Conditional Use Permit
Air Quality Management District	Permit to Construct; Permit to Operate

The City received its updated NPDES Permit (NPDES No. CA0047881) in December 2017 and a time schedule order (TSO) for compliance with the new waste discharge requirements (WDR) in June 2018.

The City is currently developing the Title 22 Engineering Report needed for permitting of a groundwater replenishment reuse project (GRRP) and anticipates delivery of a draft to the Division of Drinking Water (DDW) in June 2020.

The City worked with the County of San Luis Obispo (County) and California Coastal Commission (CCC) for several months in order to obtain a consolidated Coastal Development Permit (CDP). The City received their CDP on November 08, 2019.

The City has not completed an application to LAFCO for annexation of the WRF site into the City. Annexation is not required to either construct or operate the WRF, and the City will determine at a later date if it will proceed with the annexation process.

Through work with the County, it has been determined that no grading or building permits are needed to construct the WRF.

The Air Quality Management District (AQMD) authority to construct/authority to operate permit application have not yet been started.

A. LAND USE:	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Conversions of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), to non-agricultural use as defined under the Farmland Protection Act 7 U.S.C. 4201 et seq.	☒	☐	☐
2. Conflicts with any applicable land use plan, policy, act, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, habitat conservation plan, specific plan, local plan, or zoning ordinance).	☒	☐	☐

Please provide mitigation measures related to land use, including those that reduce a significant impact to less than significant. Please provide references and supporting documents.

mitigation measures

The proposed project would not result in the conversion of farmland to non-agricultural use. There would be no impact.

The project would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, including the City or County General Plan, Local Coastal Plan, Coastal Zone Land Use Ordinance, or Zoning Ordinance. There would be no impact.

The project would not be not located in or adjacent to a habitat conservation plan or a natural community conservation plan and therefore would not conflict with a habitat conservation plan or natural community conservation plan. There would be no impact.

B. AIR QUALITY:	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Conflicts with or delays in implementation of any applicable federal, state, or local air quality plan.	☐	☒	☐
2. Violations of any air quality standards or contributions to an existing or projected air quality violation (including protected areas designated as mandatory Federal "Class I").	☐	☒	☐
3. Increases in any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	☐	☒	☐
4. Releases of objectionable odors, such as hydrogen sulfide.	☐	☒	☐

Please provide mitigation measures related to air quality, including those that reduce a significant impact to less than significant. Please provide references and supporting documents.

Proposed project construction would cause temporary increases in localized air pollutant emissions. However, the Project is not located in a nonattainment or maintenance area for any relevant pollutants and construction emissions are not anticipated to approach de minimus levels. Overall, air quality impacts during construction will be localized and generally short-term but less than significant. Implementation of fugitive dust control measures and other standard control measures for construction equipment would reduce emissions.

The applicant proposes to implement the following best management practices:

1. AQ-1a: Fugitive Dust Control Measures

2. AQ-1b: Standard Control Measures for Construction Equipment

3. AQ-1c: BACT for Construction Equipment

4. AQ-1d: Architectural Coatings

Additional information on these mitigations can be found in the Final EIR on pages 3.3-18 through 3.3-20.

C. NOISE AND VIBRATION:	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	☐	☒	☐
2. Permanent increases in ambient noise levels in the project vicinity above levels existing without the project.	☐	☒	☐
3. Temporary or periodic increases in ambient noise levels in the project vicinity above levels existing without the project.	☐	☒	☐
4. Generation of vibration that could increase the risk of structural damage.	☐	☒	☐

Please provide mitigation measures related to noise and vibration, including those that reduce a significant impact to less than significant. Please provide references and supporting documents:

Construction of the proposed injection and monitoring wells would require continuous drilling for 24-hour periods, at noise levels in excess of standards established in the Morro Bay Municipal Code. Implementation of a Construction Noise Reduction Plan approved by the City's building official would reduce noise levels to acceptable levels. mitigation measures

Operation of the proposed injection wells in close proximity to sensitive receptors could generate noise in excess of standards established in the Morro Bay Municipal Code. A qualified noise consultant will determine the noise reduction measures to be incorporated into project design to ensure noise levels would not exceed the City's daytime and nighttime noise standards.

The proposed project would not expose people to excessive groundborne vibration either during construction or operation.

Additional information on the proposed noise reduction measures can be found in the Final EIR on pages 3.11-16 through 3.3-34.

D. GEOLOGY AND SOILS:	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Exposure of people or structures to hazards from unstable soils, landslide, lateral spreading, subsidence, liquefaction or collapse.	☐	☒	☐
2. Increase in soil erosion or loss of topsoil.	☐	☒	☐
3. Loss of economic viable mineral deposits, scientifically significant paleontological resources, or unique geological features.	☒	☐	☐

Please provide mitigation measures related to geology and soils, including those that reduce a significant impact to less than significant. Please provide references and supporting documents.

Implementation of engineering design criteria as specified by required geotechnical investigations would reduce the exposure of people or structures to hazards from unstable soils, landslides, liquefaction or collapse.

Construction of proposed project facilities would result in ground disturbance and exposure of soils to erosion. Implementation of best management practices during construction and site restoration post-construction would minimize the potential for soil erosion or loss of topsoil.

Additional information on these mitigation measures can be found in the Final EIR on pages 3.6-14 through 3.6-22.

E. WATER RESOURCES:	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Violations of any water quality standards or waste discharge requirements, including degradation of water quality.	☒	☐	☐
2. Depletion or contamination of groundwater supplies (including sole-source aquifers) or negatively interfere with groundwater recharge.	☐	☒	☐
3. Alteration of the drainage pattern of a water resource that would result in an increase in erosion or flooding on- or off-site.	☐	☒	☐
4. Soil erosion or stormwater runoff that increases sediment, pollutants, or contaminates into streams, rivers, or other water resources.	☐	☒	☐
5. Floodplain modification, development within, or redirection, as defined by executive order 11988.	☒	☐	☐
6. Increase in flood risk affecting loss on human safety, health, and welfare.	☐	☒	☐
7. Loss, degradation, or destruction of wetlands and waterbodies through direct removal, filling, hydrological interruption, or other means.	☒	☐	☐
8. Alteration of wild and scenic rivers as defined by the Wild and Scenic River Act 16 U.S.C. 1271 et seq.	☒	☐	☐
9. Conflicts with the Rivers and Harbors Act, 33 U.S.C. 403.	☒	☐	☐
10. Conflicts with the Coastal Barrier Resources Act, 16 U.S.C. 3501 et seq.	☒	☐	☐
11. Conflicts with the Coastal Zone Management Act, 16 U.S.C. 1451 et seq.	☒	☐	☐

Please provide mitigation measures related to water resources, including those that reduce a significant impact to less than significant. Please provide references and supporting documents.

Once operational, the proposed WRF would provide tertiary treatment and advanced treatment of wastewater, thereby exceeding the secondary treatment requirements mandated by the Central Coast Regional Water Quality Control Board. This would be a beneficial impact.

As a Groundwater Recharge Reuse Project, the proposed project would inject advanced treated recycled water into the Morro Valley Groundwater Basin for subsequent withdrawal as potable water

supply. The proposed project would not result in violating water quality standards or waste discharge requirements or otherwise substantially degrade water quality.

The proposed project could degrade surface water or groundwater quality in the event of pipeline rupture or accidental spill. Implementation of regulatory requirements, including a leak detection system and preventative maintenance program for new proposed project pipelines would ensure water quality in the project area is not adversely affected.

As a Groundwater Recharge Reuse Project, the proposed project would inject advanced treated recycled water into the Morro Valley Groundwater Basin for subsequent withdrawal as potable water supply. The project would not result in a net deficit in aquifer volume or lowering of the local groundwater table.

Installation of the proposed project components would alter topography and drainage patterns at each site; however, compliance with the City's Storm Water Management Plan and other NPDES regulatory requirements would minimize erosion, siltation, and flooding onsite and offsite. Implementation of mitigation requiring post-construction restoration of conveyance pipeline alignments would also ensure long-term impacts associated with erosion, siltation or flooding during storm events would be minimized.

Installation of the proposed project components would add impervious surfaces that could increase stormwater runoff from proposed project sites. Compliance with the City's Storm Water Management Plan, Stormwater Ordinance, and other NPDES regulatory requirements would require drainage control features and LID features to be incorporated into proposed project design to control and prevent increases in stormwater runoff and minimize impacts to the existing capacity of the storm drain system.

The proposed lift station and IPR wells would be located within a 100-yearflood hazard area; however, the relatively small footprint would be negligible and would not impede or redirect flood flows. In addition, decommissioning of the WWTP would remove treatment facilities from the same 100-year flood hazard area, which is beneficial because it would remove a substantial impediment within the flood plain. Overall, the introduction of IPR wells combined with the removal of the existing WWTP would result less impervious surface than the current condition, which is a net beneficial impact.

The proposed project would remove the existing WWTP from the tsunami hazard zone, but construct a new lift station within the tsunami hazard zone. Floodproof design features and compliance with the City's Tsunami Emergency Response Plan would minimize service disruptions to the wastewater system due to the potential effects of tsunami inundation of the lift station.

Additional information on these mitigation measures can be found in the Final EIR on pages 3.9-30 through 3.9-44.

F. BIOLOGICAL RESOURCES:	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Jeopardizing the continued existence of any threatened or endangered species identified in local or regional plans, policies, or regulations, or by the U.S. Fish and Wildlife Service or National Marines Fisheries Service.	☐	☒	☐
2. Modification, fragmentation, or degradation of critical habitat identified in local or regional plans, policies, or regulations, or by the U.S. Fish and Wildlife Service or National Marines Fisheries Service.	☐	☒	☐
3. Harm to fauna, including mammals, birds, reptiles, amphibians, fish, and invertebrates.	☐	☒	☐
4. Changes in vegetation type (native to the region), particularly if the vegetation type in the region is already highly fragmented because of human activity.	☒	☐	☐
5. Modification, fragmentation, or degradation of biological sensitive areas other than those mentioned above.	☒	☐	☐
6. Disturbances to marine mammals protected by the Marine Mammal Protection Act as defined under 16 U.S.C 1361-1407.	☒	☐	☐
7. Disturbances to Bald or Golden Eagles as defined under 16 U.S.C. 668 et seq.	☒	☐	☐
8. Disturbances to migratory birds as defined under 16 U.S.C. 703-712 as amended.	☒	☐	☐
9. Conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, state, or federal habitat conservation plan.	☒	☐	☐
10. Introduction or spread of invasive species as identified under Executive Order 13112.	☒	☐	☐

Please provide mitigation measures related to biological resources, including those that reduce a significant impact to less than significant. Please provide references and supporting documents.

Ground disturbing activities during construction of the proposed project could have impacts to special status plant and wildlife species, including Morro shoulderband snail, American badger, and nesting birds, as well as indirect impacts to special status plant species such as San Luis Obispo owl's clover. Pre-construction surveys will be conducted to determine presence or absence of species prior to

initiation of construction activities. If species are present, measures to avoid or relocate individuals or avoid nests would be implemented to mitigate potential adverse impacts.

This impact is found to be less than significant with the following mitigation measures:

1. BIO-1: Construction Worker Environmental Awareness Training and Education

Program

2. BIO-2: Avoidance and Protection of Biological Resources

3. BIO-3: Morro Shoulderband Snail

4. BIO-4: American Badger

5. BIO-5: Nesting Birds

Additional information on these mitigation measures can be found in the Final EIR on pages 3.4-41 through 3.4-44.

Construction of proposed conveyance pipelines could result in direct and indirect impacts to riparian habitat. Construction of proposed wells could impact riparian habitat associated with Morro Creek and Little Morro Creek. The proposed project would use trenchless construction methods to install pipelines across Morro Creek to avoid direct impacts, and wells would be sited in upland areas to avoid riparian habitat. Implementation of best management practices during construction would minimize indirect impacts to adjacent riparian areas.

This impact is found to be less than significant with the following mitigation measures:

1. BIO-6: BIO-6: Riparian Habitat Avoidance

2. BIO-7: Trenching Buffer for Jurisdictional Features

Additional information on these mitigations can be found in the Final EIR on pages 3.4-45 through 3.4-46.

Construction of proposed conveyance pipelines could result in temporary impacts to wetlands associated with ephemeral drainages; construction of the proposed wells could impact adjacent wetlands associated with Morro Creek and Little Morro Creek. The proposed project would use trenchless construction methods to install pipelines across wetlands and avoid direct impacts. Siting of the wells in upland areas would avoid direct impacts to wetlands. Implementation of best management practices during construction would minimize indirect impacts to adjacent wetland areas. This would be a Class II impact, Less than Significant with Mitigation.

This impact is found to be less than significant with the following mitigation measures:

1. BIO-8: Construction BMPs to Protect Jurisdictional Features and Aquatic Habitat

2. BIO-9: Preparation of a Frac-Out Contingency Plan

Additional information on these mitigation measures can be found in the Final EIR on pages 3.4-47 through 3.4-49.

Construction of the proposed project could affect southern steelhead, a migratory fish species, in Morro Creek and its critical habitat, as well as native wildlife nursery sites in Morro Bay. Implementation of trenchless construction methods to install conveyance pipelines across Morro Creek would avoid direct impacts to steelhead and its habitat. Implementation of a Storm Water Pollution Prevent Plan and best management practices to protect water quality in ephemeral drainages that flow to Morro Creek, Chorro Creek, and Morro Bay would minimize indirect impacts to steelhead and its habitat.

This impact is found to be less than significant with the following mitigation measures:

1. BIO-1: Construction Worker Environmental Awareness Training and Education Program

2. BIO-2: Avoidance and Protection of Biological Resources

3. BIO-7: Trenching Buffer for Jurisdictional Features

4. BIO-8: Construction BMPs to Protect Jurisdictional Features and Aquatic Habitat

5. BIO-9: Preparation of a Frac-Out Contingency Plan

Construction of the proposed project could affect streams, which are designated as Environmentally Sensitive Habitat Areas. The proposed project would use trenchless construction methods to install pipelines across streams and avoid direct impacts. Implementation of best management practices during construction would minimize indirect impacts to streams. While no trees are expected to be removed, construction of the proposed project could impact protected trees within the City limits. Protection measures would be put in place to avoid impacts from construction activities

This impact is found to be less than significant with the following mitigation measures:

1. BIO-10: Tree Protection

Additional information on these mitigations can be found in the Final EIR on pages 3.4-51.

Section 7 Consultation with the United States Fish and Wildlife Service

The EPA, with support from the City, initiated consultation with the United States Fish and Wildlife Service (USFWS) in July 2019 in accordance with section 7 of the Endangered Species Act of 1973. The EPA requested formal consultation on October 22, 2019, for the California red-legged frog (*Rana draytonii*).

The EPA also requested concurrence that the project may affect, but is not likely to adversely affect the federally endangered tidewater goby (*Eucyclogobius newberiyi*) and the federally endangered Morro shoulderband snail (*Hetminthoglypta walkeriana*).

The EPA also made the determination that the that the project would have "no effect" on the federally endangered giant kangaroo rat (Dipodomys ingens), Morro Bay kangaroo rat (*Dipodomys heermanni morroensis*), San Joaquin kit fox (*Vulpes macrotis mutica*), California clapper rail (*Rallus longirostris obsoletus*), California condor (*Gymnogyps californianus*), California least tern (*Sterna antillarum browni*), least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax trallii extimus*), blunt-nosed leopard lizard (*Gambelia silus*), and the federally threatened southern sea otter (*Enhydra lutris nereis*), marbled murrelet (*Brachyramphits marmoratus marmoratus*), western snowyplover (*Charadrius nivosus nivosus*), California tiger salamander (*Ambystoma caflforniense*),Kern primrose sphinx moth (*Euproserpinus euterpe*), and vernal pool fairy shrimp (*Branchinecta lynchi*).

A Final Biological Opinion (BO) was developed and delivered to the EPA on February 20, 2020. A summary of the consultation effort and identified avoidance for the California red-legged frog (CRLF), tidewater goby, and Morro shoulderband snail are summarized below.

Informal consultation for the tidewater goby identified that impacts could occur as a result of the construction of the Conveyance Facilities component of the project. Avoidance measures were included in the BO including:

- Implementation of sediment control measures;
- Development of a Spill Prevention Plan;
- Implementation of restrictions on refueling, maintenance, and washout activities; and
- Development of a Frac-Out Contingency Plan for trenchless construction.

Additional information on the specific avoidance measures is available in the BO (USFWS, 2020).

Informal consultation for the Morro shoulderband snail identified that impacts could occur as a result of the construction of the Conveyance Facilities component of the project since approximately one third of the pipeline route of the project would occur on Baywood fine sand soils and dune lands. Avoidance measures were included in the BO including:

- Surveying by a USFWS-approved biologist prior to initial ground-disturbing and vegetation-clearing activities that occur on dune land or Baywood fine sand;
- Implementation of setbacks of any proposed uses on the north side of Atascadero Road opposite the existing wastewater treatment plant from any potentially suitable habitat; and
- Excluding the use of silt fence from work areas where suitable sandy soils and habitat may be present.

Additional information on the specific avoidance measures is available in the BO (USFWS, 2020).

Through formal consultation for the CRLF, the following avoidance and minimization measures are summarized below:

- Erection of permanent fencing around the WRF site consisting of a concrete exclusion barrier along the eastern boundary of the site that extends 24 inches above grade with a six-inch lip and a six-foot chain link fence with privacy slats affixed to the top of the concrete exclusion barrier;

- Erection of a six-foot chain link fence with privacy slats around the remainder of the site;
- Minimizing permanent night lighting at the WRF site;
- Mitigation for the loss of CRLF critical habitat through the conservation of 19.5 acres located on the same parcel as the WRF through a conservation easement or another appropriate and feasible mechanism within 12 months of initiating construction of the project;
- Planting native trees, shrubs, and grasses to enhance the riparian restoration zone in 1.5 acres located between the WRF's eastern fence line and the property boundary parallel to Drainage 3;
- Monitoring of the riparian restoration zone by a restoration ecologist for five years or until restored areas have met success criteria;
- Participation of only USFWS-approved biologists in activities associated with the capture, handling, and relocation of California red-legged frogs;
- Survey of the project site by a USFWS-approved biologist before the onset of work activities;
- Erection of a combination silt, safety, and wildlife exclusion fence around the entire site before the start of construction at the WRF site;
- Participation of all construction workers in an Environmental Awareness Training and Education Program developed and presented by the USFWS-approved biologist for the duration of construction;
- Daily pre-construction survey and inspection under construction equipment and materials to look for CRLFs;
- Presence of the USFWS-approved biologist at the project site during initial site disturbance activities, including installation of exclusion fencing, erosion and sediment controls, and until surface disturbance has been completed;
- Development of a Spill Prevention Plan by the contractor;
- Covering of all excavated, steep-walled holes or trenches at the close of each work day or providing one or more escape ramps;
- Properly containing, removing, and disposing of all trash that may attract predators
- from the work site regularly;
- Stockpiling soils in disturbed areas that lack native vegetation;
- Use of existing routes of travel to and from the WRF construction site;
- Minimizing areas of disturbance to the maximum extent practicable;
- Minimizing nighttime lighting during construction of the WRF to the maximum extent practicable;
- Prohibiting construction workers from bringing pets and firearms to the WRF project site and from feeding wildlife;
- Following the fieldwork code of practice by the USFWS-approved biologist developed by the Declining Amphibian Populations Task Force at all time;
- Conducting regular inspections and maintenance of the slatted chain link fence;
- Development and implementation of a revegetation plan for areas of temporary disturbance; and
- Minimizing the use of herbicides during the routine maintenance landscaping and revegetated areas, which occurs outside WRF fence.

G. CULTURAL RESOURCES:	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Changes to historical resources, including archaeological and cultural resources as defined in 36 CFR part 800.	☐	☒	☐
2. Modification of unique paleontological resources or site or unique geologic features.	☐	☒	☐
3. Disturbance of human remains, including those interred outside of formal cemeteries.	☐	☒	☐

Please provide mitigation measures related to cultural resources, including those that reduce a significant impact to less than significant. Please provide references and supporting documents.

Cultural resources were evaluated in Section 3.5 of the EIR. Impacts and mitigation measures were presented in Section 3.5.3.

Section 106 Consultation with the California State Historic Preservation Office

Since the project is being funded in part by WIFIA and the City has applied for Clean Water State Revolving Funds (CWSRF) from the State Water Resources Control Board, compliance with Section 106 of the National Historic Preservation Act (NHPA) is required. The consultation resulted in the development of a Programmatic Agreement (PA). The PA shall ensure that identification, evaluation, assessment of adverse effects, and treatment to resolve adverse effects to historic properties of archaeological sites as a result of construction activities is conducted pursuant to the Archaeological Survey, Research Design, and Treatment Plan for the Morro Bay Wastewater Reclamation Facility Project, San Luis Obispo County, California (ARTP; Far Western 2018).

Due to the lack of surface visibility, restricted access prior to construction, and potential for subsurface archaeological resources within the area of potential effects (APE), a phased approach to identification was developed. The individual phases include:

- Phase 1 – WRF Construction
- Phase 2 – Conveyance Facilities (i.e., pipelines and pump stations) Construction
- Phase 3 – Recycled Water Facilities (i.e., injection wells) Construction

For Phase 1, the PA concluded that no additional identification efforts are required for construction as this project component was surveyed with negative results and excellent ground visibility and is situated on an ancient upland landform with a low sensitivity for buried resources. The next phase of archaeological identification will be preconstruction testing will be for Phase 2. For existing sites and in areas of high sensitivity for buried resources, mechanical trenching where feasible, hydraulic continuous coring within paved streets, or hand augering for shallow deposits with difficult access, will test for

presence/absence and, if present, for integrity, content, and boundaries. The final phase of archaeological identification will be testing for construction Phase 3, which will be conducted once project design is complete. This will involve deep cores to test for presence/absence and, if present, integrity, content, and boundaries. The work for Phase 2 and Phase 3 will be documented in an addendum to the initial test report including finding of effect for construction and submitted to the State Historic Preservation Office (SHPO) for review and concurrence prior to the start of construction.

H. SOCIOECONOMIC AND ENVIRONMENTAL JUSTICE:	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Changes to the demographics around project location, such as population growth.	☐	☒	☐
2. Modifications to economic factors such as per capita income, unemployment rate, or poverty.	☒	☐	☐
3. Alterations to social assets, such as housing or public services.	☐	☒	☐
4. Disproportionate high and adverse human health environmental effects on minority population and low-income populations as defined under Executive Order 12898.	☐	☒	☐

Please provide mitigation measures related to socioeconomic resources and environmental justice, including those that reduce a significant impact to less than significant. Please provide references and supporting documents.

The aboveground facilities of the proposed project would not be located near communities that are disproportionately comprised of low income or minority populations.

The number of workers required to construct and operate the proposed project would not be large enough to significantly affect the demand for housing. Thus, the proposed project would not affect service ratios or other performance objectives for fire and police protection.

The proposed project would not induce population growth and would not require the construction of new schools, parks, or other public facilities. There would be no impact.

I. TRANSPORTATION AND TRAFFIC:	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Changes to traffic patterns around the project area including, but not limited to, the arrival and departure of construction workers, vehicles hauling equipment and materials to the site, road closures or detours, and slower movement and larger turning radii of truck going to project site.	☐	☒	☐

Please provide mitigation measures related to transportation and traffic, including those that reduce a significant impact to less than significant. Please provide references and supporting documents.

Construction of the proposed project would result in temporary partial lane closures, which could affect the operations of the local and regional circulation systems and roadway safety. However, implementation of a Traffic Control Plan would minimize the effects to less than significant.

Construction of the proposed project would include temporary partial lane closures, which could impact emergency access in proximity to the project components. However, implementation of the Traffic Control Plan would require coordination with emergency responders, which include the fire department, police department, and ambulances to ensure adequate emergency access is provided.

Construction of the proposed project would include temporary partial lane closures, which could impact alternative transportation routes around the project components. However, implementation of the Traffic Control Plan would require detours or alternative routes for transit, bicyclists using on-street bicycle lanes, and for pedestrians using adjacent sidewalks.

Additional information on these mitigation measures can be found in the Final EIR on pages 3.14-9 to 3.14-24.

J. UTILITIES AND COMMUNITY SERVICES:	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Changes to electric, cable, gas, sewer, water, stormwater, and other existing utility services.	☐	☒	☐
2. Changes to community services, such as open space, recreational and cultural facilities.	☐	☒	☐

Please provide mitigation measures related to utilities and communication, including those that reduce a significant impact to less than significant. Please provide references and supporting documents.

Proposed project construction and operation would not generate excessive stormwater runoff such that new or expanded stormwater drainage facilities are required.

Operation of the proposed project would allow for the development of advanced treated recycled water for indirect potable reuse, thereby enhancing water supplies in the project area and providing water supply reliability with a new local renewable water supply. This would be a beneficial impact.

The proposed WRF will be designed to accommodate the City's projected wastewater treatment capacity needs in the future based on buildout projections under the General Plan Update. The proposed WRF infrastructure would be more reliable than the existing WWTP, thereby reducing potential service interruptions. This would be a beneficial impact.

The proposed project would generate solid waste that could require disposal at a landfill, including construction debris and biosolids during WRF operation. Existing landfills have sufficient remaining capacity to accommodate construction-related solid waste; biosolids would be reused by a biosolids management firm rather than disposed at a landfill. The proposed project would comply with all federal, state, and local statutes and regulations related to solid waste.

The proposed project would not induce population growth and would not require the construction of new parks or other public facilities. There would be no impact.

K. HAZARDOUS AND TOXIC MATERIALS AND WASTE:	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Accidental releases, spills, or improper storage and disposal of hazardous materials.	☐	☒	☐
2. Conflicts with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA), Solid Waste Disposal Act, Toxic Substances Control Act, and Emergency Planning and Community Right-to-Know Act.	☒	☐	☐
3. Generation or increase in the amount of sewage sludge that is not in compliance with EPA standards for the use or disposal of sewage sludge.	☐	☒	☐

Please provide mitigation measures related to hazards, including those that reduce a significant impact to less than significant. Please provide references and supporting documents.

Construction and operation of the proposed project would include the routine transport, use, and disposal of hazardous materials. However, the proposed project would be required to comply with all applicable federal, state, and local regulations regarding the use and disposal of hazardous materials and wastes which would reduce the potential or impacts to human health, public safety, and the environment.

Although portions of the proposed project are located adjacent to Morro Bay High School, adherence to the applicable hazardous materials regulations would reduce potential impacts regarding hazardous materials emissions within 0.25 miles of a school.

The proposed project components would not be located on sites that are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment.

The proposed project area is not within the boundaries of an airport land use plan. Construction and operation of the proposed project would not result in a safety hazard at a public airport. There would be no impact.

The City does not include a private airstrip within its boundaries. Construction and operation of the proposed project would not affect a private airstrip or create a safety hazard. There would be no impact.

Construction of proposed project components within public rights-of-way could result in partial or full lane closures and or blocked access to roadways, which could physically interfere with an emergency

response or evacuation plan. However, implementation of a Traffic Control Plan would require construction contractors to notify emergency responders including the City s Fire Department, Police Department and ambulances of planned road closures and roadway blockages. The proposed project would not be located in a very high fire hazard severity zone and as such, the potential or wildfires is considered low. All project components would be designed to comply with all applicable fire codes and fire protection requirements established by the CCR and the City's building codes, would not be constructed of highly flammable materials, and would contain water thereby reducing flammability.

Additional information on this mitigation can be found in the Final EIR on pages 3.14-9 to 3.14-24.

L. HUMAN HEALTH AND SAFETY:	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Creating occupational health hazards for workers during construction or operation.	☐	☒	☐
2. Creating or contributing to environmental health risks and safety risks that may disproportionately affect children.	☐	☒	☐
3. Creating or contributing to public health risk of immediate injury or long-term health hazards.	☐	☒	☐

Please provide mitigation measures related to human health and safety, including those that reduce a significant impact to less than significant. Please provide references and supporting documents.

Construction and operation of the proposed project would include the routine transport, use, and disposal of hazardous materials. However, the proposed project would be required to comply with all applicable federal, state, and local regulations regarding the use and disposal of hazardous materials and wastes which would reduce the potential or impacts to human health, public safety, and the environment.

M. CUMULATIVE IMPACTS	IMPACT ANTICIPATED		
	NO IMPACT	LESS THAN SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT IMPACT
1. Land Use.	☐	☒	☐
2. Air Quality.	☐	☒	☐
3. Noise and Vibration.	☐	☒	☐
4. Geology and Soils.	☐	☒	☐
5. Water Resources.	☐	☒	☐
6. Cultural Resources.	☐	☒	☐
7. Socioeconomic and Environmental Justice.	☐	☒	☐
8. Transportation and Traffic.	☐	☒	☐
9. Utilities and Community Services.	☐	☒	☐
10. Hazardous and Toxic Materials and Waste.	☐	☒	☐
11. Human Health and Safety.	☐	☒	☐

Section 4.0 of the Final EIR describes potential cumulative impacts of the proposed project. Please refer to Section 4 (pages 4-1 to 4-26) of the Final EIR for a discussion of cumulative impacts. There are no additional mitigation measures required other than those previously described above and associated with project-specific impacts.