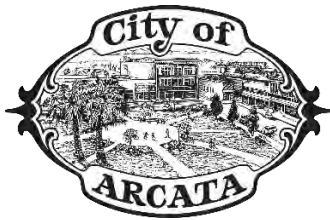


Th12a

CDP 1-20-0711 (CITY OF ARCATA)

SEPTEMBER 8, 2022

CORRESPONDENCE



736 F Street
Arcata CA 95521

City Manager
707-822-5953

Environmental Services
707-822-8184

Police
707-822-2428

Recreation
707-822-7091

Community Development
707-822-5955

Finance
707-822-5951

Engineering
707-825-2128

Transportation
707-822-3775

September 2, 2022

California Coastal Commission
1385 Eighth Street
Arcata, CA 95521

September 8th 2022 Meeting
Agenda Item 12.a

Dear Commissioners,

Thank you for the opportunity for the City of Arcata to provide written comments regarding our Coastal Development Permit application for the Arcata Wastewater Treatment Facility (AWTF) Phase I Improvement Project. The City's primary purpose in pursuing the AWTF Improvement Project is to rehabilitate and upgrade aging critical infrastructure to meet current water quality standards, eliminate byproducts associated with chlorine disinfection, protect coastal resources, and produce a higher quality effluent for beneficial use within coastal habitats while providing continuity of critical services. This letter serves to provide additional background on the City's progress with developing a Coastal Hazards Adaptation and Implementation Plan (CHAIP) (outlined as a requirement under draft Special Condition 4) and planned implementation of near-term adaptation measures through a future CDP application.

The City has been working in partnership with Coastal Commission staff throughout this Coastal Development Permit application process, which has included several discussions about the City's sea level rise adaptation strategy in relation to the currently proposed project as well as for long-term planning.

A component of the City's adaptation planning includes incremental levee augmentation (as detailed in the City's January 26th and April 14th submittals in response to Coastal Commission staff's filing information requests) to further protect the core area of treatment facility over the design life of the proposed Phase 1 wastewater treatment facility improvements. Levee augmentation will provide critical freeboard to accommodate potential impacts of combined storm and tide events. Improvements are planned to protect the core treatment facility, and would not extend bayward of the existing levee footprint. The City has been actively seeking funding for this separate levee improvement project for the past six years, and very recently (July 2022) has been awarded funding to complete the initial phase of the project (e.g. environmental review, permitting, and preliminary engineering). Funding for project construction will be contingent upon approval of all required permits.

Concurrently, for the past year the City has been seeking assistance through the State Water Board's Clean Water State Revolving Fund to complete a third-party feasibility study for the Arcata wastewater

treatment plant for future siting of wastewater facilities beyond the design life of the Phase 1 project. The City anticipates this study to commence in the fall of 2022 and will ensure the requirements of Special Condition 4 (Coastal Hazards Adaptation and Implementation Plan) are incorporated into the study.

Because securing funding for the above-referenced projects can take several years, the City has been proactively moving forward concurrently to ensure necessary adaptation measures can be implemented timely. Implementation of the future levee improvement project is not anticipated to preclude potential adaptation alternatives, and the City will implement the adaptation measures that are deemed most appropriate for given timeframes.

Given the City's progress on the CHAIP and levee improvement project, the City requests that the Commission consider removing Special Condition #10, given the City will apply for a CDP for any future shoreline protection.

If removal of Special Condition #10 is not possible, the City requests modifying Special Condition #10 to include the clarifying language in page 4 of the staff report that any future Coastal Development Permit for levee augmentation at the Arcata Wastewater Treatment Facility will need to be fully considered by the Commission. The following is suggested modified language (italicized) to Special Condition #10:

10. Waiver of Rights to Future Shoreline Protective Device(s). By acceptance of this permit, the permittee acknowledges and agrees that the redeveloped AWTF is not entitled to shoreline protection under the Coastal Act, and the permittee hereby waives, on behalf of itself and all successors and assigns, any rights to construct a shoreline protective device to protect the AWTF that may exist under the Coastal Act, certified Local Coastal Program, or other applicable laws. *This condition would not preclude the Coastal Commission from approving shoreline protection in the future if allowed under the Coastal Act, particularly where such protection is designed as part of a broader approach (as developed through the CHAIP) that can be shown to appropriately protect coastal resources over time throughout the project area."*

Thank you for your consideration of the City's request regarding Special Condition 10. City of Arcata staff will be present for the September 8 hearing to provide further information to this important project and answer any questions of the Commission.

Sincerely,



Karen Diemer
City Manager
City of Arcata

From: [Jennifer Kalt](#)
To: NorthCoast@Coastal
Cc: [Kraemer, Melissa@Coastal](mailto:Kraemer.Melissa@Coastal); [Mandy Sackett](#); [Caroline Griffith](#); [Colin](#); [Tom Wheeler](#)
Subject: Comments on Th12a, City of Arcata Wastewater Treatment Facilities Improvements Project (Phase 1)
Date: Friday, September 2, 2022 4:20:20 PM
Attachments: [Th12a.ArcataWWTFcomments.pdf](#)

Good afternoon,

Attached are comments on the City of Arcata Wastewater Treatment Facilities Improvements Project (Phase 1), agenda item Th12a, Coastal Development Permit Application No. 1-20-0711 (City of Arcata, Humboldt Co.).

Thank you for the opportunity to comment on this important project!

Jennifer Kalt, Director
Humboldt Baykeeper
600 F Street, Suite 3 #810, Arcata, CA 95521
(707) 499-3678
www.humboldtbaykeeper.org



Sept. 2, 2022

Melissa Kraemer, North Coast District
California Coastal Commission
1385 Eighth Street, #130
Arcata, CA 95521
NorthCoast@coastal.ca.gov

Submitted via email

Re: Agenda item Th 12 a, Coastal Development Permit Application No. 1-20-0711 (City of Arcata, Humboldt Co.)

Ms. Kraemer,

On behalf of Humboldt Baykeeper, Northcoast Environmental Center, Environmental Protection Information Center, and Coalition for Responsible Transportation Priorities, please accept these comments on the application by the City of Arcata to develop Phase 1 of the Wastewater Treatment Facilities Improvements Project ("Project") to meet Regional Water Board discharge requirements including, but not limited to, redeveloping aging mechanical and treatment infrastructure, constructing a new ultraviolet disinfection system and new electrical building, constructing a new outfall to brackish marsh to relocate the final discharge point, demolishing a wooden pedestrian bridge over Butcher Slough, and authorizing past and future ongoing treatment system maintenance activities located at and around 600 South G Street and the foot of South I Street adjacent to Humboldt Bay, Arcata.

We are writing to support the staff recommendations to approve a 30-year interim permit to upgrade the Arcata Wastewater Treatment Facility (AWTF) as proposed to improve water quality in Humboldt Bay while planning for relocation outside the SLR inundation zone after the life of the Project.

Support for an Interim Permit to Improve Water Quality and Protect Humboldt Bay.

We support **Special Condition 2**, which would authorize the proposed project on an interim basis of 30 years to allow for the continued operation and function of the AWTF. Approval with this condition will ensure protection of water quality and public health in the near-term, while simultaneously allowing time to plan for future wastewater treatment facility adaptation options, up to and including relocation of all or portions of the AWTF, to address changing hazard conditions as sea levels rise. As stated in the staff report, The City's ability to fully comply with current Regional Water Board requirements relies on implementation of the improvements and upgrades described in Phase 1 of the Project. A major element of the proposed upgrades will be replacing the existing chlorine disinfection system with a UV disinfection system capable of treating wet weather flows of up to 9.8 MGD, which will bring the City into compliance. Between 2012 and 2019, up to forty percent of cited violations were associated with the chlorine disinfection process, including the presence of dichlorobromomethane and carbon tetrachloride, both byproducts of this process. As a result of these violations, the City was supposed to begin using UV as its primary disinfectant no later than December 1, 2016. Bringing the AWTF into compliance as soon as possible, while simultaneously planning for relocation when the interim permit expires, will protect the health of Humboldt Bay and its residents.

Critical infrastructure projects must include long-term planning for sea level rise.

We strongly support **Special Condition 4**, which would require the applicant to develop a Coastal Hazards Adaptation and Implementation Plan that identifies strategies for protecting, relocating, or otherwise adapting the development authorized by this CDP as necessary to maintain safety from flooding and other coastal hazards in order to minimize risk and assure stability and structural integrity and to ensure protection of coastal resources over the long-term.

The Commission's Critical Infrastructure Guidance recommends using the extreme risk aversion scenario (H++) for analyzing critical infrastructure-related projects like the AWTF. This approach is important due to the potential consequences of underestimating sea level rise and the potential for significant environmental impacts resulting from damage to structures and the release of hazardous materials, risks to human health and safety, and effective and responsible use of public funding. The Commission's Critical Infrastructure Guidance and other statewide recommendations highlight the importance of phased adaptation to address current and near-term vulnerabilities while planning for extreme sea level rise scenarios. This phased approach is particularly important for vulnerable critical infrastructure, as these assets need to continue to provide public services and ensure environmental protection while long-term adaptation options are being developed, analyzed, and implemented.

Coastal Hazards Monitoring Reports

We also support **Special Condition 3**, which would require the applicant to submit biennial coastal hazards monitoring reports that, among other things, document water elevation data over the yearly reporting period and document long-term changes over the 30-year

authorization period. These reports will not only inform the City and the Commission as they plan for the future of this critical infrastructure, but also be a valuable resource for all future development planning in the Humboldt Bay area. The region is projected to experience the highest rate of relative sea level rise in the state, so monitoring changes and implementing effective strategies to address and adapt to them will be helpful to communities around the state as they plan for sea level rise adaptation.

Shoreline Protection

We strongly support **Special Condition 10**, which would require the City to acknowledge and agree that the redeveloped AWTF is not entitled to shoreline protection under Section 30235 of the Coastal Act and to waive any rights to shoreline protection that may exist under applicable law. Natural alternatives to shoreline armoring should be fully evaluated before pursuing plans to build new, taller levees, which would impact coastal resources. Relying on shoreline armoring would be harmful to the Bay in the long run and could unnecessarily forestall relocation planning, which is in the best interest of the community.

Noise Impacts

We support the recommendations for reducing noise impacts from increased use of the metal bridge over Butcher Slough if the parallel wooden bridge is demolished. This bridge is exceptionally noisy when people cross on bicycles, skateboards, etc. One of the many benefits of shifting vehicular transportation to active modes like walking, biking and rolling is a reduction in noise pollution, so it is important to design active transportation infrastructure in a way that does not produce unnecessary noise which may impact wildlife as well as other trail users.

Thank you for the opportunity to comment on this important project.

Sincerely,

Jennifer Kalt, Humboldt Baykeeper
jkalt@humboldtbaykeeper.org

Caroline Griffith, Northcoast Environmental Center
director@ournec.org

Tom Wheeler, Environmental Protection Information Center
tom@wildcalifornia.org

Colin Fiske, Coalition for Responsible Transportation Priorities
colin@transportationpriorities.org

Mandy Sackett, Surfrider Foundation
msackett@surfrider.org

From: [Daniel Holsapple](#)
To: [Gedik, Tamara@Coastal](mailto:Gedik.Tamara@Coastal); [Ted Hernandez](#); [Hazel James](#)
Subject: RE: Arcata Wastewater Treatment Project (CDP Application 1-20-0711)
Date: Wednesday, August 31, 2022 10:56:51 AM
Attachments: [image001.png](#)

Hi Tamara,

Thank you for sending this. I am happy with everything that was included in Special Condition 13 and with the findings and tribal consultation notes.

All the best,

Daniel Holsapple

Tribal Historic Preservation Officer

Blue Lake Rancheria
dholsapple@bluelakerancheria-nsn.gov
Office: (707) 668-5101 ext.1062

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I acknowledge my residence in Goudi'ni (Arcata), part of the ancestral territory of the Wiyot peoples. I offer my reconciliation and respect to their elders past and present.

<https://www.wiyot.us/162/Wiyot-Placename-Video>

From: Gedik, Tamara@Coastal [mailto:Tamara.Gedik@coastal.ca.gov]
Sent: Tuesday, August 30, 2022 10:43 AM
To: Hazel James <hazel@wiyot.us>; adam@wiyot.us; Daniel Holsapple <dholsapple@bluelakerancheria-nsn.gov>; Melanie McCavour <melaniemccavour@brb-nsn.gov>; THPO@brb-nsn.gov; Rachel Sundberg <rsundberg@trinidadrancheria.com>
Subject: Arcata Wastewater Treatment Project (CDP Application 1-20-0711)

[EXTERNAL EMAIL] This e-mail originated from outside the Blue Lake Rancheria. Please take caution with its content and do not click links or attachments unless you recognize the sender and know that they are safe.

Greetings All,

Attached please find a copy of the hearing notice that was separately mailed to you. The Commission hearing for this item (Item Th12a) is scheduled for Thursday September 8.

The staff report and supporting documents for the subject project have been uploaded to the Commission's website at <https://www.coastal.ca.gov/meetings/agenda/#/2022/9> and can be accessed online using the following links:

- Report: <https://documents.coastal.ca.gov/reports/2022/9/Th12a/Th12a-9-2022-report.pdf>
- Exhibits: <https://documents.coastal.ca.gov/reports/2022/9/Th12a/Th12a-9-2022-exhibits.pdf>
- Appendices: <https://documents.coastal.ca.gov/reports/2022/9/Th12a/th12a-9-2022-appendix.pdf>

The special condition regarding inadvertent discovery protocol is included as Special Condition 13 on page 23 of the staff report, and the findings regarding archaeological resources and tribal consultation begin on page 81.

Please let me know if you have any questions.

Thank you,

-Tamara

~Tamara L. Gedik

Supervising Analyst

California Coastal Commission

1385 8th Street, Suite 130, Arcata, CA 95521

Phone: (707) 826-8950, extension 4 (currently teleworking; voice mail only)

Tamara.Gedik@coastal.ca.gov

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The Commission remains open for business and in-person appointments are available upon request. The best way to contact me is by email. In addition to the regular means of mailing documents (please, no UPS or FEDEX at this time) as required by the regulations or statute, please make sure that you also send a copy of all correspondence or other documents electronically to me via email.

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From: [McSmith, Justin@Waterboards](mailto:McSmith.Justin@Waterboards)
To: [Gedik, Tamara@Coastal](mailto:Gedik.Tamara@Coastal); [Moore, Heaven@Waterboards](mailto:Moore.Heaven@Waterboards); [Bey, Ryan A.@Waterboards](mailto:Bey.Ryan.A.@Waterboards)
Subject: RE: Arcata Wastewater Treatment Project (CDP Application 1-20-0711)
Date: Tuesday, August 30, 2022 10:30:55 AM

Thank you very much Tamara. This has been a lot of work to get to this point. We appreciate the cooperation throughout the lead up to this meeting!

Justin

From: Gedik, Tamara@Coastal <Tamara.Gedik@coastal.ca.gov>
Sent: Tuesday, August 30, 2022 10:29 AM
To: McSmith, Justin@Waterboards <Justin.McSmith@Waterboards.ca.gov>; Moore, Heaven@Waterboards <Heaven.Moore@Waterboards.ca.gov>; Bey, Ryan A.@Waterboards <Ryan.Bey@Waterboards.ca.gov>
Subject: Arcata Wastewater Treatment Project (CDP Application 1-20-0711)

EXTERNAL:

Good morning, Justin et al,

Attached please find a copy of the hearing notice that was separately mailed to you. The Commission hearing for this item (Item Th12a) is scheduled for Thursday September 8.

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- Appendices: <https://documents.coastal.ca.gov/reports/2022/9/Th12a/th12a-9-2022-appendix.pdf>

Please let me know if there are any other contacts from your agency I should be outreaching to, and please don't hesitate to contact me with any questions or if you'd like to discuss any of the particulars of the staff recommendation.

Thank you,

-Tamara

~Tamara L. Gedik

Supervising Analyst

California Coastal Commission

1385 8th Street, Suite 130, Arcata, CA 95521

Phone: (707) 826-8950, extension 4 (currently teleworking; voice mail only)

Tamara.Gedik@coastal.ca.gov

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