UNITED STATES DEPARTMENT OF COMMERCE
Economic Development Administration
Washington, DC 20230

February 12, 2015

Via email

Richard Lucas
Jennifer Witherspoon
Vicki Gold
Mount Shasta Bioregional Ecology Center

Dear Mr. Lucas, et al.:

This letter is in response to your Freedom of Information Act (5 U.S.C. § 552) ("FOIA") request dated January 9, 2015 that was received on January 12, 2015 by the Economic Development Administration ("EDA").

Per your request, you seek a copy of the following records:

1. Any subsequent amendments or updates to the application submitted to the EDA by or on behalf of the City of Mount Shasta and Crystal Geyser (listed as primary beneficiary) for funding to carry out the improvement of a sewer pipeline and to provide new jobs to the community.

The stated purpose of the Project is to:

- expand its capacity for current and future growth in the community
- to prevent storm water from leaking into the existing sewer pipe
- to eliminate manhole leaking
- to accommodate Crystal Geyser's wastewater
- to add 2 new wastewater treatment ponds
- to add 150 new jobs to the community

2. All the documents, including legal documents, maintained in the EDA's project file for the above-mentioned grant not already sent in early December 2014.

3. *All communications from December 7, 2014 through present (and additionally including items italicized in #4. below).* among the City of Mount Shasta, or its employees, officers, or contractors, Crystal Geyser, CGWA or Otsuka Pharmaceuticals or its employees, officers, contractors or attorneys, all emails, correspondence, and handwritten notes referencing phone

conversations regarding communication among EDA (Seattle, Washington and Sacramento branches), California Department of Fish & Wildlife representatives, Siskiyou County Planning Director Greg Pluckett or Richard Tinsman, Siskiyou Economic Development Council representatives, NorthState Resources, PACE Engineering, letters of support and all communications from Senator Diane Feinstein, Senator Barbara Boxer, former Congressman Wally Herger, Congressman Doug LaMalfa and any other communications from other agencies regarding the EDA grant.

4. All internal communications among employees and/or officials of the EDA regarding the grant. This request also applies to any non-identical duplicates of records that, by reason of notation, attachment, or other alteration or supplement, include any information not contained in the original record. *Apparently according to a recent conversation with Shannon Fitzgerald she recalled that there may be additional records of emails pertaining to the grant that were not previously sent since laptop computers were used by staff prior to the October 2013 operation systems upgrade post malware infection. I am told these are in storage but accessible by your IT staff and would date from 2012 through October 2013.*

Fees are charged for processing FOIA requests in accordance with the uniform fee schedule outlined in the Department of Commerce Regulations found at 15 C.F.R. § 4.11. As an "All Other Requesters," fees are charged for search and duplication of the records. Since the response to your FOIA request resulted in less than two hours of search time but more than 100 pages, EDA will waive all fees for your request.

At this time, EDA is releasing an **interim response** to your inquiry. EDA is releasing 168 pages in this interim response (167 pages are released in their entirety and 1 page is partially redacted). Please note that the search for documents related to your FOIA request is still ongoing.

The redacted information is being withheld under FOIA exemption (b)(5). Exemption (b)(5) exempts from disclosure communications that are pre-decisional and part of the deliberative process (which includes attorney-client privileged communications). The purposes of this specific exemption are: (1) to encourage open, frank discussions on matters of policy between subordinates and superiors; (2) to protect against premature disclosure of proposed policies before they are actually adopted; and (3) to protect against public confusion that might result from disclosure of reasons and rationales that were not in fact ultimately the grounds for an agency's action.

Also, EDA is withholding, in its entirety, the following documents pursuant to Exemption (b)(5):

- 2-page document entitled "Meeting Minutes" attached to a March 20, 2013 email from Brian Parker to A. Leonard Smith re: "Congressional Contact, Office of Senator Dianne Feinstein: City of Mt. Shasta Grant Application";

- 1-page document containing two emails between Kristine Skrinde and Michelle Branigan (attorney), one dated December 18, 2014 and the other December 19, 2014, re: "City of Mt Shasta – CA";

- 1-page document containing one email, dated December 11, 2014, from Michelle Branigan (attorney) to Shannon Fitzgerald re: "Anything new/EA on Mt Shasta?"; and

- 1-page document containing two emails, both dated January 12, 2015—one is from Stephen Kong (attorney) to A. Leonard Smith and Kristine Skrinde re: "FOIA File No. SRO 15-06," the other is from Kristine Skrinde to others re: "FW: FOIA File No. SRO 15-06."

Pursuant to 15 CFR § 4.10, you have the right to appeal an adverse determination with respect to your FOIA request (as described under 15 CFR § 4.7(b)) by filing either a written or electronic appeal with the Assistant General Counsel for Administration. A written or electronic appeal must be received within 30 calendar days of the date of this response letter by the Office of Assistant General Counsel for Administration, Room 5898-C, U.S. Department of Commerce, 14th and Constitution Avenue, N.W., Washington, D.C. 20230. Your appeal may also be sent by e-mail to FOIAAppeals@doc.gov, by facsimile to (202) 482-2552, or via FOIAonline (if you have a FOIAonline account) at https://foiaonline.regulations.gov/foia/action/public/home#. The appeal must include a copy of the original request, the response to the request and a statement of the reason why withheld records should be made available and why denial of the records was in error. The submission, whether by e-mail, facsimile or FOIAonline, is not complete without the required attachments. The appeal letter, the envelope, the e-mail subject line, and the fax cover sheet should all be clearly marked "Freedom of Information Act Appeal." The email, FOIAonline, and fax machine in the Office of the Assistant General Counsel for Administration are monitored only on working days during normal business hours (8:30 a.m. to 5:00 p.m., Eastern Time, Monday through Friday). FOIA appeals posted to the e-mail box, fax machine, FOIAonline, or Office after normal business hours will be deemed received on the next normal business day.

Please contact my office at (202) 482-4687 if you have any questions or concerns.

Sincerely,

Stephen D. Kong
Freedom of Information Act Officer

Project: Sewer Line and Wastewater Treatment Facility Improvements
Applicant: City of Mount Shasta, Siskiyou County, California
Project Number: 07-79-07000

I. PROJECT DESCRIPTION

This project is located within and just west of the City of Mount Shasta (the City), Siskiyou County, California. The scope of work for this EDA project involves increasing the capacity of a main sewer line (upsizing an existing 12-inch sewer interceptor line to an 18 or 24-inch interceptor line). The applicant would replace 6,000 to 9,000 feet of line and manholes. The new sewer line would run parallel to the existing sewer line. The new sewer line would be within existing right-of-ways (ROW) and easements. The existing sewer line would be abandoned in place. The project also includes constructing two ponds (approximately 4 to 4.5 million gallons each) with earthen dikes and related headworks at the Mount Shasta Wastewater Treatment Plant (WTP) which is to the southwest of the City.

Specifically, the proposed sewer line will begin at Manhole 402 at the end of West Jessie Street. It will proceed west under the Interstate 5 (I-5) Freeway to the resumption of West Jessie Street on the west side of I-5. At that point, it will proceed approximately 600 feet to the intersection of West Jessie and Hatchery Lane. Then it will turn south crossing under Hatchery Lane and will proceed approximately 3,000 feet across wetlands and meadow. Then it will turn to the southwest to intersect Old Stage Road. It will cross Old Stage Road and will follow the ROW for 2,000 feet across pasture and wetlands to Ream Avenue. It will cross Ream Avenue and continue south to Manhole 20. This will be a gravity-flow system and there are no lift stations. The sewer line will also cross Cold Creek.

Details on project description are provided in the engineering report in the EDA Application for Federal Assistance and any amendments thereto.

II. PURPOSE AND NEED

These infrastructure improvements will support development in the commercially-zoned area along North Mount Shasta Boulevard which has pockets of industrial use. It would also support the reuse of a vacant water bottling facility.

The primary beneficiary would be Crystal Geyser Water Company which is a subsidiary of Otsuka Enterprises, a Japanese conglomerate. Crystal Geysers is in the process of purchasing the

vacant Coca Cola bottled water facility that was initially operated by Danone Waters of North American (Dannon). In addition to Crystal Geyser, other beneficiaries would include businesses that support the bottling plant, such as storage, refrigeration, and trucking companies. The sewer line upgrade would also support in-fill development along North Mount Shasta Boulevard.

II. DATA BASE

This Environmental Assessment and all attachments hereto are a part of the environmental file. Findings made in this Environmental Assessment that are based upon information referenced in this Section III are completed with the understanding that all data presented by the Applicant, public agencies, and other individuals and entities as referenced were provided truthfully and with full disclosure of the relevant facts. Detailed information upon which environmental impacts are assessed is contained in the following documents:

1. Applicant's Environmental Narrative, with attachments, notes, and addendums
2. CH2MHILL for the Central Valley Regional Water Quality Control Board, August 2001, Dannon Natural Spring Water Bottling Facility, Mount Shasta, California, Proposed Initial Study/Mitigated Negative Declaration
3. U.S. Geological Survey map
4. FEMA Floodplain map
5. U.S. Fish and Wildlife Service (FWS) National Wetlands Inventory map
6. North State Resources, Inc., March 6, 2013, letter to City Planner Keith McKinley regarding Biological Resources
7. North State Resources, Inc., March 5, 2013, letter to City Planner Keith McKinley regarding Cultural Resources
8. Native American Historic Commission, February 1, 2011, Native American Tribal Consultation List
9. Letter to the U.S FWS
10. Siskiyou Daily News, August 9, 2013, Affidavit of Publication and newspaper clipping
11. Mount Shasta Herald, August 7 and 14, 2013, newspaper clipping
12. CH2MHILL, December 13, 2012, Technical Memorandum regarding Mt. Shasta Sewer Capacity Analysis for Crystal Geysers
13. Articles on bottled water facilities

IV. ENVIRONMENTAL IMACTS

The Environmental Narrative and documents in the Data Base are used to develop this Environmental Assessment in order to comply with the National Environmental Policy Act (NEPA) of 1969. This Environmental Assessment (EA) has been prepared to comply with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) NEPA regulations (40 CFR Parts 1500-1506), and the U. S. Department of Commerce's Economic Development Administration's (EDA) Directive 17.02-2, *EDA Program to Implement the National Environmental Policy Act of 1969 and Other Federal Environmental Mandates as Required.* These laws and directive require an evaluation of potential environmental effects prior to the approval of the release of funding for a proposed construction project. EDA, as a federal agency, is required to complete an independent environmental assessment for each Federal Action not deemed qualified for a Categorical Exclusion as interpreted in EDA Directive 17.02-2 (10/14/92). The following subsections provide impact assessment for concerns that include wetlands, floodplains, wilderness, wild and scenic rivers, endangered species, land use, farmland,

historic preservation, archaeological resources, solid waste, hazardous waste, water quality, air quality, noise, transportation, coastal zones, environmental justice, and construction. Additionally, this document reviews public reaction, alternatives to the proposed project, and cumulative and indirect impacts.

A. Alternatives

The existing sewer line is through two wetlands, one of which is a wetlands mitigation bank. The applicant is working with both the U.S. Fish and Wildlife Service and the U.S. Army Corps of Engineers on installing the new line parallel to the existing one. If for some reason this is not possible, the applicant has also considered running the line in the right-of-way of an adjacent road, although that route would require lift stations and the acquisition of easements and right-of-ways.

As for replacing the sewer line under I-5, the applicant believes there is adequate room for upsizing the interceptor. If there is not adequate room, the applicant will bore and jack under I-5 which will involve obtaining a permit from the California Department of Transportation (CalTrans).

The No Action alternative would curtail future developments in the northern and central areas of the City at some future point. It would also prevent the reuse of the water bottling facility.

If the preferred alternative route present significant environmental impacts and regulatory constraints that cannot be mitigated for (e.g., running the line through the wetlands conservation area, obtaining a CalTrans permit in a timely manner), then the alternative routes will be used.

B. Wetlands and Floodplains

The original sewer main was installed in 1970 through two seasonally-flooded wetlands (freshwater emergent). According to the application and retired City Manager Ted Marconi, in 1990, the northern-most wetland was set aside as a wetlands conservation area as mitigation for the development of a shopping center on the east side of I-5. The southern wetland, which is not in the conservation area, is used as pastureland. However, it still qualifies as a wetland under the U.S. Army Corps of Engineers' (Corps) Hydrogeomorphic methodology of identifying wetlands. The sewer line also crosses the Cold Creek. The applicant has applied for a Clean Water Act (CWA) Section 404 permit from the Corps for dredging and fill within the wetlands and a Water of the U.S. As part of this, the applicant will either need to conduct a wetland delineation or sign a Preliminary Jurisdictional Determination. The applicant anticipates that the Corps will require certain mitigation measures, such as planting willows, and stockpiling and replacing soil over the new line.

With the Corps' CWA Section 404 permit and the mitigation measure required by it, this project will have no significant impacts on wetlands or Waters of the U.S. The requirements in Executive Order 11990 are met.

FEMA Flood Insurance Rate Map Number 06093C3025D, effective January 19, 2011, was reviewed for potential floodplains. The sewer line and wastewater treatment facility are in Flood Zone X, which is protected from the 100-year flood. The requirements in Executive Order 11988 have been met. This project will have no significant impacts on floodplains.

C. Wilderness and Wild and Scenic Rivers

The project is located east of the Shasta National Forest. Part of the project is near the Sacramento River, although it is not designated as a Wild and Scenic River. There are no wilderness areas; wildlife habitats; state or national refuges, parks; or designated wild and scenic rivers in the immediate project area. This project will have no impacts on any of the above.

D. Endangered Species

City staff and a biologist from North State Resources, Inc. conducted a preliminary biological review of the sewer line route by driving the route and occasionally stopping and noting vegetation communities and wetland types. These field notes were compared to habitat requirements of special-status plant and wildlife species known to occur in the region to develop a preliminary list of special-status species that could occur in the project area. The results of the survey were sent to the City in a March 6, 2013 letter. There was a subsequent August 13, 2013 letter noting the lack of habitat for vernal pool fairy shrimp.

The results of the report indicated that no federally-listed wildlife species have the potential to occur within the project area. The preliminary biological reports notes that one federal candidate for listing, the Pacific fisher (*Martes pennanti*), has the potential to use the area for foraging.

Three state-listed species have potential to occur: the willow flycatcher (*Empidona traillii brewsteri*), greater sandhill crane (*Grus canadensis tabida*), and bald eagle (*Haliaeetus leucocephalus*). California species of special concern which may occur within the project area are the foothill yellow-legged frog (*Rana boylii*), the Cascades frog (*Rana cascadae*), northwestern pond turtle (*Clemmys marmorata marmorata*), and the yellow warbler (*Dendroica petechia*).

No federally-listed or state-listed plant species are likely to occur in the project area. There are four special status plant species, which are California Native Plant Society RPR 1b and 2-ranked species. These plants are: Oregon fireweed (*Epilobium oreganum*); Aleppo avens (*Geum aleppicum*); northern adder's tongue (*Ophioglossum pusillum*); and marsh skullcap (*Scutellaria galericulata*).

On March 12, 2013, the City sent an informal Endangered Act Section 7 consultation letter to the U.S. Fish and Wildlife Service (USFWS) Office in Yreka. In the letter, the City proposed that construction would be done in late summer/fall when there should be no immobile young fishers or nesting birds. A pre-construction survey for special status plants is also proposed. If special status plants are present, they will be mapped and avoided. If impacts to special status plants are unavoidable, appropriate conservation measures will be implemented. A determination of "may affect, but is not likely to adversely affect" was initially made for the proposed project.

In an August 28, 2013 email, the FWS concurred that there will be "no effect" to vernal pool fairy shrimp. According to the FWS, if there are indirect or cumulative impacts to Big Springs, then the effect of those impacts on listed species will need to be determined. An assessment will need to be done on proposed groundwater impacts to Big Springs before the FWS consultation can be concluded.

In an August 29, 2013 email, the FWS recommended contacting the National Oceanic and Atmospheric Administration (NOAA) Fisheries regarding Central Valley steelhead which are

federally listed as threatened and winter run chinook salmon. On August 30, 2013, NOAA Fisheries confirmed that there are no federally-listed fish above Shasta Dam and therefore none in the project area (personal communication, Amy Moore).

There are Black oak trees where the applicant proposes to construct the ponds at the Mount Shasta WTP. The Black oak trees may provide nesting habitat for birds protected under the Migratory Bird Treaty Act. Therefore, the trees should either be removed during non-nesting season or a survey should be conducted for nesting migratory birds prior to removal. If nesting migratory birds are present, then the applicant will need to wait until chicks have fledged and left the nest.

Implementing any mitigation measures that result from consultation with the FWS, NOAA Fisheries and CDFW should reduce any impact to federally listed species to less than adverse. Special conditions are included to address this.

E. Land Use and Zoning

The project is located within with the City of Mt. Shasta and unincorporated Siskiyou County. Land use includes open space, rural residential, small farms, and infrastructure (sewer plant, roads and interstate). The project crosses several zones including single-family residential and commercial (although in single-family housing) within the City. The zoning also includes County land zoned as Single Family with five acre minimum lot sizes, and Non-Prime Ag Land. North of I-5 is primarily residential, although there is commercial zoning along N. Mount Shasta Boulevard and pockets of industrial use. This project is consistent with land use and zoning.

F. Prime Farmland

There are no prime farmlands in the vicinity of the project site. There will be no significant impacts to prime farmland.

G. Historic/Archaeological Resources

The applicant has conducted a cultural resources records search through Northstate Resource, Inc. at the Northeast Information Center (NEIC). There is one prehistoric site within 0.07 miles of the site and four historic-era sites within 0.25 miles of the project site, the closest of which is 0.08 miles from the project. No resources listed on the National Register of Historic Places or on any of the California lists are located within the 0.25 mile radius of the project. No surveys have been conducted in the project area. Previous surveys (in the area) indicate a moderate probability for cultural resources, both prehistoric and historic-era, to be present.

A list of Native American Tribes was provided from the Native American Heritage Commission. The Native American Heritage Commission provided a list of eight tribes that expressed an interest in the project area. The archaeological consultant identifies the Winnemen Wintu Tribe, the Pit River Tribe, the Shasta Nation; and the Modoc Tribe as the tribes to be most likely associated with the area.

A special condition is included that National Historic Preservation Act Section 106 consultations must be completed with the State Historic Preservation Office and Native American Tribes before any earth-disturbing activities occur.

H. Solid Waste Disposal

The existing sewer line will be abandoned in place. Excess trenching spoils from construction will be disposed of in appropriate fill areas outside of wetlands. The primary beneficiary will produce wastes typical of bottling facilities including plastic, cardboard, and packing materials. California law requires that major commercial and industrial operations implement recycling programs for these materials. Other solid waste will be send to one of the City's Black Butte Transfer Station where it is then sent to one of several Siskiyou County landfills. This project will have no significant impact on solid waste disposal.

I. Hazardous Waste

An EDA Form ED-535, Applicant Certification Clause, was executed for this project. There were no indicators from this form or other information provided by the applicant of concerns regarding hazardous materials or toxic substances. Based on the nature of the affected areas around the project components and the due diligence performed by the applicant, it is concluded that there are no hazardous material concerns related to the EDA project. Consistent with EDA Directive 17.01 (07/09/92; revised 03/18/98), a grant condition is in the Standard Terms and Conditions of the Grant Agreement to indemnify EDA from liability regarding any damages resulting from hazardous waste contamination.

J. Water Quality, Resources, and Uses

Surface Water

There are several surface water bodies near the project. The sewer line will cross Cold Creek. The WTP is near and discharges to the Sacramento River during certain times of the year. There are also numerous springs (e.g., Big Springs, Cold Springs) which fed in to Big Springs Creek and Cold Creek. These drain to Siskiyou Lake which is created by Box Canyon Dam on the Sacramento River.

A Streambed Alteration Agreement with the California Department of Fish and Wildlife (CDFW) will be required for work in Cold Creek. If the applicant decides to bore under the creek, a notice will still need to be provided to the CDFW. A Corps 404 permit will be required for trenching in the wetlands and creek.

A National Pollution Discharge Elimination Systems (NPDES) Stormwater Permit is required for this project if it disturbs more than one acre. With a Stormwater Permit and a Stormwater Pollution Prevention Plan (SWPPP), this project will have no significant erosion or runoff impacts.

In August 2001, a Proposed Initial Study/Mitigated Negative Declaration (IS/MND) that was prepared by CH2MHILL was used issued by the Central Valley Regional Water Quality Control Board (CVRWQC) for improvements at the Dannon bottled water facility. The IS/MND identified possible impacts to the California Department of Fish and Game (now California Department of Fish and Wildlife) Mount Shasta Fish Hatchery from groundwater pumping for the Dannon facility. The impacts were identified as being less than significant to Big Springs, Big Springs Creek, and the CDFG water diversion to the Mount Shasta Fish Hatchery. However, the IN/MND contained the mitigation measure that if over time there was a significantly reduced flow on Big Springs Creek, Dannon would discuss and participate with all other water users in developing a proportionate, equitable and mutually agreed action plan to address such an issue. It appears that Crystal Geyser will extract more groundwater than Dannon did (see discussion below). Therefore, impacts to Big Springs Creek will be greater, although without further information and analysis it is not known if they will be significant.

Wastewater

The permitted capacity of the Mount Shasta WTP is 0.8 million gallons per day (MGD). The average dry weather flow (ADWF) to the WTP is 0.6 MGD. Peak wet weather flow to the WTP is 2 to 3 MGD. Treated wastewater from the WTP is disposed in a variety of ways depending on several factors. During the summer months when it cannot be discharged into the Sacramento River, it is used to irrigate the Mount Shasta Resort Golf Course. It is also disposed in a leachfield near Highway 89.

With the two ponds and headworks improvements, an additional 0.25 MGD of treatment capacity will be added, resulting in an upgraded treatment capacity of 1.05 MGD, which provides 0.45 MGD in available treatment capacity. Upgrading the sewer line would increase the conveyance ability of the system by 0.75 MGD.

According to the CVRWQCB WDR, the average discharge rate for the Dannon facility with three production lines would be 60,000 gallons per day (gpd), with a maximum discharge rate of 108,000 gpd. According to a Technical Memoradum by CH2MHILL, dated December 13, 2012, the Crystal Geysers bottling facility will generate wastewater flows of 675,000 gpd. The Environmental Narrative states that the amount of wastewater generated by Crystal Geysers could ultimately reach 750,000 gpd. The wastewater would consist primarily of rinse water generated by cleaning bottles and equipment. The rinse water would contain fruit juices and peracetic acid (a weak acid used for cleaning).

The City is undertaking a feasibility study to determine if the current plant processes will enable them to meet new NPDES requirements and future loading from the primary beneficiary, or whether they will have to redesign the entire plant. While the proposed upgrade of the wastewater conveyance and treatment systems would facilitate the initial start-up of the primary beneficiary, additional wastewater infrastructure upgrades would be required for full build-out. The new lagoons, which are 4 to 4.5 million gallons in capacity, will be needed as storage and ballast even if they are not part of the treatment system in the future.

Groundwater

In the City of Mount Shasta, water is either provided by the City's water system (produce from Cold Springs and groundwater wells) or private wells. The sourcewater for the primary beneficiary is the Big Springs Aquifer. These sources are recharged by precipitation on the flanks of Mount Shasta. Studies prepared for Dannon indicated that the groundwater used by the bottling facility was in hydraulic connection with down-gradient Big Springs. The Dannon facility was served by one well (DEX-6) that is 2,000 feet to the north of the bottling facility. The Environmental Narrative states that Crystal Geyser facility will be served by a series of wells. The California Department of Water Resources requires permits for groundwater wells. Water produced by wells is regulated by the Siskiyou County Public Health Department.

According to the IN/MND, the Dannon facility with three production lines pumped an average of approximately 150 gallons per minute, or 78.8 million gallons per year, from the Big Springs Aquifer. Dannon also trucked in approximately 7.7 million gallons per year from Mossbrae Spring in Dunsmuir. According to the Environmental Narrative, the primary beneficiary could use up to one million gallons per day (1 MGD) of groundwater. This could equate to 365 million gallons per year, although it is unknown if the facility would use 1 MGD every day.

The IS/MND identified the following impacts to groundwater from the Dannon facility: a maximum reduction in groundwater levels to the closest private wells of approximately six (6) inches; and a slight reduction in flow from Big Springs (Headwaters Spring) of approximately 1.8 to 3.5 percent on average with a maximum effect of approximately five (5) percent. At the time the study was done, no municipal or private wells were closer than 1,500 feet from Dannon's production well (DEX-6). Impacts to groundwater, nearby wells, and springs were determined to be less than significant.

It appears that the primary beneficiary will use more groundwater than what was previously used. The facility will use more rinse water because of rinsing the equipment between the different flavors of water and teas that will be produced. The existing leachfield cannot handle the increase in rinse water so rinse water will be discharge to the sewer. This means recharge to groundwater will be less than when Dannon was using the leachfield for disposal of rinse water. With more groundwater use and no recharge to groundwater from the bottling facility, there will be greater impacts to groundwater, wells, Big Springs, and Big Springs Creek. A study will need to be done to determine if these impacts are significant.

Summary

Special conditions are included regarding the requisite Corps 404 permit, CDFW Streambed Alteration Agreement, and NPDES Stormwater Permit. With these permits and implementation of the mitigation measures within them, this project should not have significant impacts on surface water quality or, if there are significant impacts, they will be temporary.

The impact to groundwater levels, springs, and surface water fed by the springs could be potentially significant. Until more is known about the quantity and timing of groundwater extraction by the primary beneficiary, the impacts of the project on groundwater cannot be assessed in this Environmental Assessment. Information regarding documented impacts from the Dannon and Coca Cola operations to groundwater and springs would also be useful in assessing impacts. A special condition is included that the requisite CEQA analysis also examine indirect impacts from the project to groundwater, wells, springs, streams, and the CDFW Mt. Shasta Fish Hatchery.

K. Air Quality

According to the July 2013 U.S. EPA website on non-attainment areas, Siskiyou County is not in any non-attainment areas. As increase in truck traffic from the operation of the primary beneficiary will create additional impacts on air quality. The IN/MDN identified potentially significant air impacts from the Dannon plant. However, at the time that the IN/MND was prepared, the County was in non-attainment for PM10 (particulate material 10 micron or less in size). The County is no longer in non-attainment for PM10. Therefore, air impacts are less than significant.

L. Noise

The only potential for significant noise impacts associated with the EDA project would be during construction. Contractors will be expected to take appropriate measures and to use Best Management Practices (BMP) to keep noise levels to within tolerable and regulated limits such as using muffled construction equipment and limiting construction activity to reasonable hours. There will be no significant noise impact from this project.

M. Transportation

Regarding direct impacts to transportation from the proposed project, the wastewater line will intersect existing road right-of-ways (ROW) in three locations. Construction in the roads will create temporary impacts. The project also includes boring under the I-5 ROW and an encroachment permit will need to be obtained from the California Department of Transportation for that.

According to the Environmental Narrative, the transportation systems, both local streets and regional roads, will not change as a result of this project. However, the IS/MND indicated that there would be a slight increase in traffic on local roads with the operation of the bottling plant. For the Dannon facility, there were 3 to 5 delivery trucks per day and 10 truck of final product. Employee vehicle trips ranged from 22 to 35 per day. The IS/MND did not identify traffic impacts as being potentially significant.

N. Coastal Zone Management

The Coastal Zone Management Act does not apply to this project.

O. Environmental Justice

Executive Order 12898 concerns avoiding federal actions that may have a disproportionate adverse health or environmental impact on minority and low-income populations. This project will have no adverse impact on minority or low-income populations.

P. Construction

Contractors will be expected to use best management practices (BMP) methods to minimize noise, erosion, siltation, particulate air pollution, and other effects associated with construction activities. This project will have no significant construction impacts.

Q. Public Reaction

The City has discussed the proposed wastewater project at City Council meetings, but no formal public hearings have been held yet. Under CEQA, the City will conduct an analysis of the impacts associated with of the proposed wastewater infrastructure project.

As part of the EDA grant application process, NEPA public notices were published in local and regional newspapers. This was followed by a 15-day public comment period. The NEPA public notice was published in the weekly Mount Shasta Herald on August 7 and 14, 2013. The notice was published in the regional Siskiyou Daily News on August 9, 2013. The 15-day public comment period ended on August 29, 2013. No public comments were received.

While it was not disclosed in the Environmental Narrative, information from newspaper articles and websites indicate that bottled water facilities (the primary beneficiary) are controversial and contentious. A proposed new water bottling plant by Nestle Waters North America in the neighboring town of McCloud was the subject of a lawsuit and eventually not built. Crystal Geyser proposed building a water bottling facility in the town of Orland in Glenn County. Crystal Geyser decided to not build the new facility in Orland and instead decided to reopen the vacant Coca Cola water bottling facility in Mt. Shasta. Concerns in the McCloud project included impacts to streams and springs. Concerns in the Orland case included impacts to groundwater and adjacent wells.

V. CUMULATIVE AND INDIRECT IMPACTS

Environmental Narrative, under Item 20, Cumulative Impacts to Proposed Project, provided evidence of consideration of incremental impacts of the action, when added to other past, present, and reasonably foreseeable future actions. (40 CFR Section 1508.7)

The Environmental Narrative states that there are no foreseeable indirect or cumulative effects of this project on the environment that cannot be mitigated during the course of construction. However, the IN/MND for Dannon facility noted that the bottled water facility would have effects that are individually limited, but cumulatively considerable. Elsewhere in the IN/MND, it states that the Dannon project would not contribute to cumulative impacts to Big Springs aquifer, adjacent groundwater users, or Big Springs Creek.

The Mount Shasta Municipal Code, Chapter 13.95, specifically exempts commercial bottling water enterprises from having to obtain a groundwater extraction permit in the City of Mount Shasta. In Siskiyou County, bottling is permitted outright. Therefore, if other bottled water facilities located in or adjacent to the City of Mount Shasta, there could be significant cumulative impacts to groundwater. At

this time, there is no information that other bottling facilities plan on building additional bottled water facilities in the area.

The indirect impacts of pumping up to one million gallons per day of groundwater with no groundwater recharge could impact groundwater, wells, springs, creeks, and the Mount Shasta Fish Hatchery. The severity of those impacts cannot be assessed without additional information that will be collected as part of the CEQA process.

VI. CONCLUSION

While sewer infrastructure projects tend to not be controversial, the primary beneficiary of this sewer project will be a bottled water facility. Bottled water facilities have been controversial. Depending on the amount of groundwater extracted, the project has the potential to create significant adverse impacts to ground water quantity, springs, and possibly surface water quantity and quality. Review of all available data and completion of this Environmental Assessment have resulted in a Mitigated Finding of No Significant Impact (Mitigated FONSI). A CEQA analysis will be conducted for this proposed project. A determination of impacts to Big Springs will be necessary to finish the ESA consultation with the FWS. Should the impacts determination or CEQA analysis indicate that there are significant adverse impacts that cannot be mitigated to less than significant, then this Mitigated FONSI will be withdrawn.

With the requisite permits, consultations, agreements, and mitigation measures, in my opinion the approval of this project will not violate the following:

1. The National Environmental Policy Act of 1969, as amended
2. American Indian Religious Freedom Act
3. The Archeological and Historic Preservation Act of 1974
4. The Clean Air Act, as amended
5. The Clean Water Act, as amended
6. Coastal Barrier Act
7. Coastal Zone Management Act as amended
8. Community Environmental Response Facilitation Act of 1992
9. Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended
10. The Endangered Species Act , as amended
11. Environmental Quality Improvement Act of 1970, as amended
12. Executive Order 11514, Protection and Enhancement of Environmental Quality, as amended
13. Executive Order 11593, Protection and Enhancement of the Cultural Environment
14. Executive Order 11988, Floodplain Management
15. Executive Order 11990, Protection of Wetlands
16. Executive Order 12088, Federal Compliance with Pollution Control Standards
17. Executive Order 12372, Intergovernmental Review of Federal Programs, as amended
18. Farmland Protection Policy Act
19. Fish and Wildlife Coordination Act, as amended
20. Marine Protection, Research and Sanctuaries Act of 1972, as amended
21. Marine Sanctuaries Amendments of 1984, as amended
22. The National Historic Preservation Act of 1966, as amended
23. Noise Control Act of1972, as amended
24. Pollution Prevention Act of 1990
25. Resource Conservation and Recovery Act of 1976, as amended
26. The Safe Drinking Water Act
27. Superfund Amendments and Reauthorization Act of 1986
28. Toxic Substances Control Act, as amended
29. The Wild and Scenic Rivers Act, as amended

(19) **SPECIAL CONDITIONS:** To assure mitigation of potential environmental impacts, mitigation measures are used in the form of grant conditions. The following Special Conditions are recommended for placement on the Grant Agreement as an addendum to the General Term and Conditions:

U.S. ARMY CORPS OF ENGINEERS (ACOE): Prior to advertisement for construction bid, the Recipient shall provide evidence satisfactory to the EDA that the ACOE has issued a Clean Water Act Section 404 permit for the project.

U.S. FISH AND WILDLIFE (USFWS): Prior to advertisement for construction bid, the Recipient shall provide evidence satisfactory to the EDA that consultations with the FWS under the Endangered Species Act and Migratory Bird Treaty Act have been completed, and mitigation measures resulting from these have been incorporated into construction plans.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW): Prior to advertisement for construction bid, the Recipient shall provide evidence satisfactory to the EDA that a Streambed Alteration Agreement has been obtained from the CDFW for work in Cold Creek and resulting mitigation measures are incorporated into construction plans.

CALIFORNIA STATE HISTORIC PRESERVATION OFFICER (SHPO): Prior to any earth-disturbing activities, the Recipient shall provide evidence satisfactory to the EDA that the National Historic Preservation Act Section 106 consultations have been completed with the California SHPO and Native American Historic Preservation Officers, and recommendations resulting from these have been incorporated into construction plans.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA): Prior to advertisement for construction bid, the Recipient provide evidence satisfactory to EDA that a CEQA analysis of the project has been completed, including an analysis of indirect impacts from the project to groundwater, wells, springs, streams and the CDFW Mount Shasta Fish Hatchery

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEMS (NPDES): Prior to earth-disturbing activities, the Recipient shall provide evidence satisfactory to the EDA that a Stormwater NPDES Permit for General Construction has been obtained from the California Regional Water Quality Control Board.

PREPARED BY: Shannon FitzGerald DATE: 8.30.13

Shannon FitzGerald
Regional Environmental Officer

Note: This concise format is in accordance with NEPA guidance provided by the President's Council on Environmental Quality at: http://www.nepa.gov/nepa/regs/guidance.html

APPENDIX

ENVIRONMENTAL NARRATIVE, FIGURES, CORRESPONDENCE, AND OTHER MATERIALS SUBMITTED BY APPLICANT AND OTHER PARTIES ARE PART OF AND SUPPORT THE FINDINGS OF THE ENVIRONMENTAL ASSESSMENT

U. S. DEPARTMENT OF COMMERCE
Economic Development Administration
915 Second Avenue, Room 1890
Seattle, WA 98174
Fax: 206.220.7669
Voice: 206.220.7660

Finding of No Significant Impact

MEMORANDUM FOR THE PROJECT FILE

SUBJECT: Environmental Impact Determination and Necessary Environmental Findings for the City of Mt. Shasta, California, Sewer Line and Wastewater Treatment Facility Improvements Project Number 07-79-07000

An environmental assessment has been prepared for the subject project and is attached. After reviewing the assessment and supporting materials, I find that for the following reasons the project will not significantly affect the quality of the human environment.

- The project is a Class II Action as defined by EDA Directive 17.02-2.
- Both the individual and cumulative impacts will not be significant.
- No unique or unusual environmental conditions exist which would be adversely affected by the project.
- The project will not exceed two or more indicators of significance.
- The project is compatible with local land use plans, zoning restrictions, and the Comprehensive Economic Development Strategy (CEDS).
- The Agency policy with respect to Executive Orders 11988, Floodplain Management, and 11990, Wetlands Protection, has been met because the project will not impact either the values or functions of a floodplain or wetland.
- No known cultural resources will be impacted by the project.
- Project design will mitigate identified construction impacts.
- The pre-approval requirements of EDA Directive 17.02-7 are met.
- No negative comments have been received through the state or regional clearinghouse processes, and federal public notice process.

An environmental assessment has been prepared for the subject project and is attached. For the above reasons, and with the inclusion of the attached Special Condition, preparation of an environmental impact statement is not required.

A. Leonard Smith
Regional Director

9.3.2013
Date

Special Conditions:

U.S. ARMY CORPS OF ENGINEERS (ACOE): Prior to advertisement for construction bid, the Recipient shall provide evidence satisfactory to the EDA that the ACOE has issued a Clean Water Act Section 404 permit for the project.

U.S. FISH AND WILDLIFE (USFWS): Prior to advertisement for construction bid, the Recipient shall provide evidence satisfactory to the EDA that consultations with the FWS under the Endangered Species Act and Migratory Bird Treaty Act have been completed, and mitigation measures resulting from these have been incorporated into construction plans.

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NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEMS (NPDES): Prior to earth-disturbing activities, the Recipient shall provide evidence satisfactory to the EDA that a Stormwater NPDES Permit for General Construction has been obtained from the California Regional Water Quality Control Board.

Parker, Brian

From: Ted Marconi <TMarconi@ci.mt-shasta.ca.us>
Sent: Wednesday, August 14, 2013 12:11 PM
To: FitzGerald, Shannon; Parker, Brian
Subject: NEPA Publication Notices
Attachments: FWS Ltr Reconsideration.pdf; NEPA Notice Sisk.pdf; 6810 - nepa public notice - affidavit.pdf

Shannon and Brian,

Attached are the notices of publication for the NEPA and NHPA review.
Also attached is a copy of our letter requesting a reconsideration by the Fish and Wildlife office of their non-concurrence with our determination regarding threatened and endangered species.

Thank you for all your help with this project.

Ted Marconi
City Manager
City of Mt. Shasta
530) 926-7519
fax (530) 926-0339
marconi@ci.mt-shasta.ca.us

PROOF OF PUBLICATION
(2015.5 C.C.P.)

Mt. Shasta Area Newspapers
Mount Shasta Herald,
Weed Press, Dunsmuir News
STATE OF CALIFORNIA,
County of Siskiyou

I am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the Administrative Assistant of the Mt. Shasta Area Newspapers, newspapers of general circulation, published weekly in the cities of Mount Shasta, Weed and Dunsmuir, County of Siskiyou, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Siskiyou, State of California, under the dates of: Mount Shasta Herald-July 9, 1951, Case Number 14392; Weed Press-June 22, 1953, Case Number 15231; Dunsmuir News-May 25, 1953, Case Number 15186; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspapers and not in any supplement thereof on the following dates, to-wit:

August 7 and 14,

all in the year 2013

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Mount Shasta, California,

this 14th day of August

2013.

/s/ Marcella Gerace
Authorized Signature

PROOF OF PUBLICATION OF

CITY OF MT SHASTA
PUBLIC NOTICE

The U.S. Department of Commerce, Economic Development Administration (EDA) is considering a request for Federal assistance from the City of Mt. Shasta to construct a Mt. Shasta Wastewater System Upgrade in Mt. Shasta, Siskiyou County, California. Pursuant to the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA), EDA is conducting an assessment of the potential of the proposed project to affect the environment and/or historic properties.

The project includes upsizing of the main sewer interceptor line and construction of two new ponds and associated headworks at the Wastewater Treatment Facility. The project will be located at in the current sewer line right of way primarily between Interstate 5 and Old Stage Road from West Jessie Street to Ream Avenue and at the Wastewater Treatment Facility at 1500 Grant Road. Project information is available for review at Mt. Shasta City Hall, 305 N. Mt. Shasta Blvd., Mt. Shasta, CA: (530) 926-7510.

If you have any information regarding potential impacts environmental resources or historic properties associated with this proposed project, please, provide it in writing to:

U.S. Department of Commerce
Economic Development Administration
Seattle Regional Office
Attn: Regional Environmental Officer
915 Second Avenue, Room 1890
Seattle, Washington 98174-1012

Comments received in the EDA Regional Office by 5:00 p.m. in the Pacific Time Zone on August 29, 2013 will be considered. A copy of the NEPA/NHPA decisional document will be available upon request at the above EDA Regional Office.

6810 msan au7,14c

PROOF OF PUBLICATION

AFFIDAVIT OF PUBLICATION

CITY OF MT. SHASTA
ATTN: ACCOUNTS PAYABLE
305 N. MT. SHASTA BLVD.
MOUNT SHASTA, CA 96067

IN THE MATTER OF

NEWS #6808
CITY OF MT. SHASTA PUBLIC NOTICE

STATE OF CALIFORNIA) ss:
County of Siskiyou)

FAINA GAYNOR

of said County, being duly sworn, deposed and says: THAT she is and at all times herein mentioned was a citizen of the United States of America, over the age of twenty-one years, and that she is not, nor was she at any of the times hereinafter named a party to, nor interested in the above entitled matter; that she is the PRINCIPAL CLERK OF THE PRINTER of THE SISKIYOU DAILY NEWS, a newspaper of general circulation, printed and published in the City of Yreka, County of Siskiyou, State of California, and which newspaper is published for the dissemination of local and telegraphic news and intelligence of a general character, and which newspaper at all times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said City of Yreka, County of Siskiyou, State of California, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to; and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race or denomination, or any number of same; that the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof, on the following; dates, to-wit:

AUGUST 9, 2013

Siskiyou Daily News adjudicated May 18, 1953, No. 15190

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

(Signed) Faina Gaynor

Date: 8.9.13

U. S. DEPARTMENT OF COMMERCE
Economic Development Administration
915 Second Avenue, Room 1890
Seattle, WA 98174
Fax: 206.220.7669
Voice: 206.220.7660

DEC 19 2014

Mr. Paul Eckert
City Manager
City of Mt. Shasta
305 North Mt. Shasta Boulevard
Mount Shasta, California 96067

RE: EDA Award No. 07-79-07000
Mt. Shasta Sewer Line and Wastewater Treatment Facility Improvement Project

Dear Mr. Eckert:

EDA has reviewed your November 12 and November 26, 2014 letters regarding a budget revision to the subject EDA award as well as your response to EDA's November 21, 2014 letter. Thank you for the additional information. As you are aware, the project has experienced significant controversy involving the prime beneficiary which has resulted in the City's request to amend the project budget to help fund a California Environmental Quality Act Environmental Impact Report (EIR). The funding for the EIR was **not part** of the approved scope of work. Originally, the "Other A/E" line item was established at $95,000 to accomplish necessary environmental reviews such as cultural resources consultations and wetlands delineation. However, the request to utilize both the "Other A/E" line item as well as 60 percent ($269,263) of the "Contingency" line item is a substantial increase that fundamentally alters the original purpose of the EDA project funds. "Contingency" line item funds are typically utilized to address construction cost issues such as change orders. Therefore, after review of the City's budget revision request and with consideration of the original intent of the EDA grant award, EDA is not in a position to approve the proposed budget revision.

EDA realizes that these budget difficulties were essentially beyond your control, and we sincerely regret that the project has not proceeded as originally planned. We note the comments in your letter that the project may not continue without the proposed budget revision, and we offer the following alternatives for your consideration:

- The purpose of the EDA funds is to aid local economic development and ultimately lead to the creation of permanent jobs. EDA's funding purpose could be addressed with utilization of the EDA funds **solely** at the City's wastewater treatment plant. Further, if the City had State funding available for wastewater treatment plant work, then those State funds might be eligible to be used as match to the EDA funds and provide for increased improvements at the wastewater treatment plant. This would allow the City to serve future business development and meet State-mandated wastewater treatment requirements; or

- The City could request a termination for convenience on the EDA grant, which will result in a termination of all of EDA's obligations to the project and a return of all non-obligated EDA project funds (less potential eligible, non-cancellable costs) to the U.S. Treasury.

To allow for the upcoming holiday period, please provide your response to EDA within 45 calendar days. Please address any questions to Mr. Stan Good, Civil Engineer, at (206) 220-7701.

Sincerely,

A. Leonard Smith
Regional Director

Copy to: Malinda Matson, EDR

CITY of Mt SHASTA

305 North Mt. Shasta Boulevard
Mt. Shasta, California 96067
Tel (530) 926-7510
Fax (530) 926-1342
www.mtshastaca.gov

January 5, 2015

Mr. A. Leonard Smith
Regional Director
915 Second Avenue Room 1890
Seattle, WA 98174

RE: EDA Award No. 07-79-07000
Mt. Shasta Sewer Line and Wastewater Treatment Facility Improvement Project

Greetings Director Smith:

Again, thank you for most recent correspondence received December 26, 2014. This letter follows up on our most recent letter dated December 30, 2014. A Councilmember and our City Attorney suggested that City staff reemphasize an element of the line item transfer request contained in our prior letters. The City of Mt. Shasta wants to emphasize that the line item transfer represents the total amount of requested transfer. The amount of $269,263 from the contingency is a "not to exceed" amount. The City would not request any additional transfers for the purpose of the environmental review. In the unlikely event more funding was required the City would utilize funds from other sources. As reminder, our request in no way affects the total amount of the EDA's Grant Award.

It is our understanding that a small vocal minority has reached out to the EDA. We want to underscore to you that this project has strong support from the broader community. Comments you may receive relating to the projected costs of the EIR process are speculative and flawed. The City believes the amount we have requested to transfer is an accurate reflection of future costs.

We hope this information is useful and that it may alter the alternatives you provided in your letter received December 26th. At this point we remain committed to recommending to the City Council that all work related to the Interceptor Project be terminated immediately until such time other alternatives are identified, if any. We will inform Crystal Geyser of our intentions as well. As mentioned, we may also approach the Siskiyou County Board of Supervisors regarding EIR funding since the project actually resides in the unincorporated County area and not the City of Mt. Shasta.

Again, we remain very appreciative of the award and your flexibility to allow it to be utilized for our ongoing WWTP improvements. At this point, redirecting the funds to the WWTP appears the most likely outcome. The EDA's continued support of our region is critical to our region due to our distressed economics. As you may be aware, Siskiyou County has nearly the lowest per capita incomes and nearly the highest unemployment rate in the State of California.

As previously mentioned, we will discuss our alternatives at the January 26th public City Council meeting. We hope to respond to your letter shortly thereafter. We want to again assure you that we will

diligently cooperate with all EDA and other agency requirements while genuinely meeting the expectations of our area residents, openly and cooperatively.

We thank you for your support and the alternatives you have provide for our consideration. Our community remains very appreciative and excited about the beneficial economic impacts of our EDA Grant.

Respectfully,

Paul Eckert, City Manager
City of Mt. Shasta

Copy City Council
City Finance Director
City Attorney John Kenny
Consultant Project Attorney Andrea Mattarazzo, Pioneer Law Group

CITY of Mt SHASTA

305 North Mt. Shasta Boulevard
Mt. Shasta, California 96067
Tel (530) 926-7510
Fax (530) 926-1342
www.mtshastaca.gov

December 30, 2014

Mr. A. Leonard Smith
Regional Director
915 Second Avenue Room 1890
Seattle, WA 98174

RE: EDA Award No. 07-79-07000
Mt. Shasta Sewer Line and Wastewater Treatment Facility Improvement Project

Greetings Director Smith:

Thank you for most recent correspondence received December 26, 2014 including your response to our request for a line item transfer. Your response followed the attached letters regarding the line item transfer request from the City of Mount Shasta to the EDA dated: November 6th; November 12th; November 26th; and December 12th. We understand and greatly appreciate your response and alternatives. While not involved in the initial grant development, the Finance Director and I have consistently been under the impression that the funding of the EIR was an appropriate element of the EDA Grant Award. EDA staff members David Farnsworth-Martin and Stan Good understood and supported the EIR's financial impacts as long as they did not create overruns.

Our previous letters reflected this understanding and also included documents referencing the funding of WWTP improvements. As shared previously, the City does not have the financial means to fund the expanded EIR without the use of the existing EDA and Crystal Geyser funding. Simply put, our community cannot shoulder these expenses without additional funding. Therefore, staff will soon recommend to the City Council that all work related to the Interceptor Project be terminated immediately until such time other alternatives are identified, if any. We will inform Crystal Geyser of our intentions as well. We also hope to brainstorm options with Crystal Geyser that would allow for the Interceptor Project to continue. Crystal Geyser will have a variety of alternatives to consider, including onsite treatment and funding of the EIR among other options. We may also approach the Siskiyou County Board of Supervisors regarding EIR funding since the project actually resides in the unincorporated County area and not the City of Mt. Shasta.

We remain very appreciative of the award and your flexibility to allow it to be utilized for our ongoing WWTP improvements. At this point, redirecting the funds to the WWTP appears the most likely outcome. The EDA's continued support of our region is critical to our region due to our distressed economics. As you may be aware, Siskiyou County has nearly the lowest per capita incomes and nearly the highest unemployment rate in the State of California.

We will discuss our alternatives at the January 26th public City Council meeting. We hope to respond to your letter shortly thereafter. We want to again assure you that we will diligently cooperate with all

EDA and other agency requirements while genuinely meeting the expectations of our area residents, openly and cooperatively.

We thank you for your support and the alternatives you have provide for our consideration. Our community remains very appreciative and excited about the beneficial economic impacts of our EDA Grant.

Respectfully,

Paul Eckert, City Manager
City of Mt. Shasta

Copy City Council
City Finance Director
City Attorney John Kenny
Consultant Project Attorney Andrea Mattarazzo, Pioneer Law Group

U. S. DEPARTMENT OF COMMERCE
Economic Development Administration
915 Second Avenue, Room 1890
Seattle, WA 98174
Fax: 206.220.7669
Voice: 206.220.7660

DEC 19 2014

Received 12/26/14

Mr. Paul Eckert
City Manager
City of Mt. Shasta
305 North Mt. Shasta Boulevard
Mount Shasta, California 96067

RE: EDA Award No. 07-79-07000
Mt. Shasta Sewer Line and Wastewater Treatment Facility Improvement Project

Dear Mr. Eckert:

EDA has reviewed your November 12 and November 26, 2014 letters regarding a budget revision to the subject EDA award as well as your response to EDA's November 21, 2014 letter. Thank you for the additional information. As you are aware, the project has experienced significant controversy involving the prime beneficiary which has resulted in the City's request to amend the project budget to help fund a California Environmental Quality Act Environmental Impact Report (EIR). The funding for the EIR was **not part** of the approved scope of work. Originally, the "Other A/E" line item was established at $95,000 to accomplish necessary environmental reviews such as cultural resources consultations and wetlands delineation. However, the request to utilize both the "Other A/E" line item as well as 60 percent ($269,263) of the "Contingency" line item is a substantial increase that fundamentally alters the original purpose of the EDA project funds. "Contingency" line item funds are typically utilized to address construction cost issues such as change orders. Therefore, after review of the City's budget revision request and with consideration of the original intent of the EDA grant award, EDA is not in a position to approve the proposed budget revision.

EDA realizes that these budget difficulties were essentially beyond your control, and we sincerely regret that the project has not proceeded as originally planned. We note the comments in your letter that the project may not continue without the proposed budget revision, and we offer the following alternatives for your consideration:

- The purpose of the EDA funds is to aid local economic development and ultimately lead to the creation of permanent jobs. EDA's funding purpose could be addressed with utilization of the EDA funds **solely** at the City's wastewater treatment plant. Further, if the City had State funding available for wastewater treatment plant work, then those State funds might be eligible to be used as match to the EDA funds and provide for increased improvements at the wastewater treatment plant. This would allow the City to serve future business development and meet State-mandated wastewater treatment requirements; or

- The City could request a termination for convenience on the EDA grant, which will result in a termination of all of EDA's obligations to the project and a return of all non-obligated EDA project funds (less potential eligible, non-cancellable costs) to the U.S. Treasury.

To allow for the upcoming holiday period, please provide your response to EDA within 45 calendar days. Please address any questions to Mr. Stan Good, Civil Engineer, at (206) 220-7701.

Sincerely,

A. Leonard Smith
Regional Director

Copy to: Malinda Matson, EDR

CITY of Mt SHASTA

305 North Mt. Shasta Boulevard
Mt. Shasta, California 96067
Tel (530) 926-7510
Fax (530) 926-1342
www.mtshastaca.gov

December 12, 2014

Mr. A. Leonard Smith
Regional Director
915 Second Avenue Room 1890
Seattle, WA 98174

RE: EDA Award no. 07-79-0700 City of Mt Shasta. CA

Greetings Director Smith:

Earlier this week we had a the opportunity to have a constructive telephone conference with our EDA Project Manager Stan Good and several other key EDA Team members. We discussed: the EDA process associated with our existing line item transfer request from the "Contingency" line item to the "additional engineering and services" line item to properly account for California mandated environmental expenses; the letter of verification from Crystal Geyser CEO Doug MacLean that they are NOT closing other facilities; and information required from the EDA describing the interceptor line and sewer plant improvements.

Attached you will find a letter from our Project Engineer describing the sewer project improvements and their respective timing. Also attached are minutes from the City's Project Engineer dated 1/6/14 and our minutes taken by our City Public Works Director dated 10/24/13. Both minutes are from meetings that included EDA staff, consultant engineers, and City staff. The meetings included in depth conversations regarding our intended process for sewer plant improvements, including support and approval of the EDA staff.

As background to our previous line item transfer request, our current Award includes funding for CEQA Environmental review, we specifically requested a line item transfer of $269,263 from the contingency line item to be added to the "Other architectural and engineering fees" for the specific purpose of funding the increased CEQA process costs due to requirements by the State of California as interpreted by our legal experts from the Pioneer Law Group in Sacramento and our Environmental experts North State Resources in Redding, CA.

As shared previously, if we are unable to transfer the funds and complete the expanded EIR, we fear the Crystal Geyser project and our sewer project will be challenged through legal processes. The City does not have the financial means to fund the expanded EIR without the use of the existing EDA and Crystal Geyser funding.

We remain very appreciative of the award. We have worked diligently to conform to all EDA requirements, as well as all applicable State of California CEQA requirements. We have worked diligently to meet the needs and expectations of all of our residents in all regards for this project that is outside of our boundaries. As stated previously, we have used a variety of experts to ensure compliance with our CEQA requirements and to protect our community's natural resources. We have incurred

nearly $200,000 of project expense to date and have experienced hundreds of hours of staff and City Council time on the County's project. As shared previously, we need approval of the line item transfer in order for our project to proceed. Without continued EDA approval and support, the City Council will need to reconsider the project and evaluate our options relevant to the costs incurred to date.

Simply put, our community cannot shoulder these expenses without EDA funding. As you may be aware, Siskiyou County has nearly the lowest per capita incomes and nearly the highest unemployment rate in the State of California. The City of Mt. Shasta has a very limited economy and budget and is only able to provide very limited City services. There was absolutely no possibility for the City to provide sewer services without the EDA Grant Award and the funding provided by Crystal Geyser.

We are working diligently to meet all of the EDA, CEQA, and other agency requirements while meeting the expectations of our area residents. We understand the EDA is in contact with County and City residents. In addition to working to meet all EDA and CEQA requirements, we want to assure you that our City Council, consultants, and staff are working genuinely and very cooperatively with our area residents.

We thank you for your clarification and your ongoing support and consideration. We remain committed to remaining in full compliance with the terms of our EDA Award. Our community remains very appreciative and excited about the beneficial economic impacts of our EDA award.

Respectfully,

Paul Eckert, City Manager
City of Mt. Shasta

Copy City Attorney John Kenny
Consultant Project Attorney Andrea Mattarazzo, Pioneer Law Group

FitzGerald, Shannon

From: Kanim, Nadine <nadine_kanim@fws.gov>
Sent: Wednesday, November 05, 2014 10:42 AM
To: FitzGerald, Shannon
Subject: Re: Notice of Preparation of Draft EIR for Mt. Shasta Sewer Line Improvement Project

Thanks so much, Shannon. This information is very helpful and I'm glad to have the EA for my files. I look forward to hearing from you, if there are any new developments on the project!

Cheers,
Nadine.

On Tue, Nov 4, 2014 at 1:34 PM, FitzGerald, Shannon <SFitzGerald@eda.gov> wrote:

Hi Nadine,

When I got back from lunch, there was a message from Vicki, so I will give her a call back.

I've attached a copy of the environmental assessment and FONSI for the City of Mt. Shasta's sewer line project. As you'll see, there are a lot of special conditions associated with it. For instance, when I asked if a hydrologic report had been done regarding indirect effects on groundwater, springs, streams, which in turn can affect special status species, I was told that a hydrologic study would be done as part of the EIR. So I'm hoping that the EIR provides information that can be used in further assessing impacts and in consultations.

Thanks for staying in touch on this. I'll let you know if there are any new developments on our end. –Shannon

Shannon FitzGerald

Regional Environmental Officer

Economic Development Administration

915 Second Avenue, Room 1890

Seattle, WA 98174

Phone: 206-220-7703

Fax: 206-220-7657

sfitzgerald@eda.gov

From: Kanim, Nadine [mailto:nadine_kanim@fws.gov]
Sent: Tuesday, November 04, 2014 11:50 AM
To: FitzGerald, Shannon
Subject: Notice of Preparation of Draft EIR for Mt. Shasta Sewer Line Improvement Project

Hi Shannon,

Thanks for filling me in on the status of the Mt. Shasta Sewer Line Improvement Project, yesterday. It was great to talk with you! And thanks for faxing the Notice of Preparation of the Draft EIR for the project. After we spoke, I thought it might be good for me to have a copy of the EA that was prepared for the project last year. Do you have an electronic copy you could send?

Also, I gave your contact information to Vicki Gold, a Mt. Shasta resident, so you might be hearing from her. Vicki was concerned that agencies might not know about the Crystal Geyser connection to the Mt. Shasta Sewer Line Improvement Project.

Thanks again for your help on this!

Nadine.

--

Nadine R. Kanim

Fish and Wildlife Biologist

U.S. Fish and Wildlife Service

Yreka Fish and Wildlife Office

1829 S. Oregon Street

Yreka, California 96097

(530) 841-3108

(530) 842-4517 (fax)

nadine_kanim@fws.gov

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Nadine R. Kanim
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
Yreka Fish and Wildlife Office
1829 S. Oregon Street
Yreka, California 96097
(530) 841-3108
(530) 842-4517 (fax)
nadine_kanim@fws.gov

FitzGerald, Shannon

From: Vicki Gold <victoria7@snowcrest.net>
Sent: Monday, December 08, 2014 11:04 AM
To: FitzGerald, Shannon
Subject: Re: EDA grant Mount Shasta/ Crystal Geyser

Hi Shannon,
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Thanks so much,
Vicki Gold

FitzGerald, Shannon

From: FitzGerald, Shannon
Sent: Wednesday, December 10, 2014 1:20 PM
To: 'Vicki Gold'
Subject: RE: EDA grant Mount Shasta/ Crystal Geyser

Hi Vicki,

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Thanks for the information. -Shannon

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FitzGerald, Shannon

From: Vicki Gold <victoria7@snowcrest.net>
Sent: Wednesday, December 10, 2014 1:25 PM
To: FitzGerald, Shannon
Cc: Branigan, Michelle
Subject: Re: EDA grant Mount Shasta/ Crystal Geyser

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Thanks so much,
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FitzGerald, Shannon

From: FitzGerald, Shannon
Sent: Wednesday, December 10, 2014 1:38 PM
To: 'Vicki Gold'
Subject: RE: EDA grant Mount Shasta/ Crystal Geyser

Hi Vicki,

Sorry for the delay--it's been really busy. EDA prepared an EA. Regarding the comments on the NOP, we would be interested in seeing those.

Thanks for the information. -Shannon

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FitzGerald, Shannon

From: FitzGerald, Shannon
Sent: Wednesday, December 10, 2014 3:24 PM
To: 'Vicki Gold'
Subject: RE: EDA grant Mount Shasta/ Crystal Geyser

Hi Vicki,

The project manager should have included information in the pre-award file. I'll ask him to provide that to our Regional Council. In the meantime, I can provide her with the EA in response to the FOIA.

I will request the comment on the NOP from the City.

Thanks, Shannon

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From: Vicki Gold [mailto:victoria7@snowcrest.net]
Sent: Wednesday, December 10, 2014 1:25 PM
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FitzGerald, Shannon

From: Vicki Gold <victoria7@snowcrest.net>
Sent: Thursday, January 08, 2015 5:48 PM
To: FitzGerald, Shannon
Subject: Fwd: Crystal Geyser Mount Shasta and CCTC jobs projected

Hello Shannon,
I am forwarding this link below provided by the CalCompete Tax Incentive program at the GoBiz office.
Thanks so much for reviewing.
Vicki

Begin forwarded message:

From: Vicki Gold <victoria7@snowcrest.net>
Subject: Crystal Geyser Mount Shasta and CCTC jobs projected
Date: January 6, 2015 12:56:38 AM PST
To: Malinda Matson <MMatson@eda.gov>

Hello Malinda,
We just received this with the link to the application/ credit agreement between CCTC and CGWC. It seems to verify our position that very few new jobs will be created by the Mount Shasta CGWC project. Although as I said. the job numbers were redacted from their 12/14/14 letter sent to you, I imagine the numbers comply with the CCTC grant application and certainly are nowhere near the numbers projected in the 2013 EDA grant application (150-200 at full build out)
Any news from Seattle?
Thank you again,
Vicki

Begin forwarded message:

From: William Koch <William.Koch@GOV.CA.GOV>
Subject: RE: Revised letter from W.A.T.E.R group in Mt Shasta
Date: January 5, 2015 5:01:58 PM PST
To: 'Bruce Hillman' <bhillman@pacbell.net>, Vicki Gold <victoria7@snowcrest.net>

Hi Bruce & Vicki,

The agenda has been posted and Crystal Geyser is #19 on the list. The link to Crystal's credit agreement is below, however, the agreement is not effective unless approved by the committee. I received your revised letter earlier today and will include it in the briefing binders for the committee members.

http://www.business.ca.gov/Portals/0/CA%20Competes/Docs/Agreements/FY1415P1/20.%20Crystal%20Geyser%20Water%20Company.pdf

Thanks,

Will Koch
Deputy Director, California Competes Tax Credit Program
California Governor's Office of Business and Economic Development (GO-Biz)
1325 J Street, 18th Floor
Sacramento, CA 95814
william.koch@gov.ca.gov
www.business.ca.gov

FitzGerald, Shannon

From: Vicki Gold <victoria7@snowcrest.net>
Sent: Thursday, January 08, 2015 5:54 PM
To: FitzGerald, Shannon
Subject: CGWC attorney's letter responding to NOP
Attachments: churchwellwhite.pdf

> Above attached is Barbara Brenner's NOP response for Crystal Geyser.

Churchwell White LLP

churchwellwhite.com

1201 K Street, Suite 710
Sacramento, CA 95814
T 916.468.0950 | F 916.468.0951

Barbara A. Brenner
T 916.468.0625
barbara@churchwellwhite.com

December 01, 2014

VIA U.S. MAIL & E-MAIL (tlapthorne@mtshastaca.gov)

Tammy Lapthorne
Deputy City Clerk
City of Mount Shasta
305 North Mt. Shasta Boulevard
Mt. Shasta, CA 96067

Re: Comments to the Notice of Preparation for the Mount Shasta Sewer Line Improvements Draft Environmental Impact

Dear Ms. Lapthorne:

On behalf of Crystal Geyser Water Company ("Crystal Geyser"), we appreciate the opportunity to comment on the Notice of Preparation ("NOP") of a Draft Environmental Impact Report ("Draft EIR") for the Mount Shasta Sewer Line Improvements Project, which the City of Mount Shasta ("City") circulated as the lead agency. The purpose of this letter is to respond to areas where the NOP addressed Crystal Geyser's bottling plant in connection with the City's sewer upgrade project.

At the present time, we have three initial comments to the NOP and other issues that were raised during the NOP scoping session:

First, some members of the public have questioned the timing of CEQA review of the City's sewer upgrade project vis-à-vis Crystal Geyser's activities at its bottling plant. In response to these questions, we note that Crystal Geyser may seek to dispose its rinse water and other discharges into the City's existing sewer system prior to the completion of the City's sewer upgrade project. The City's sewer upgrade project does not constitute a basis for precluding discharges into the existing system, so long as discharges from the bottling plant do not exceed the existing capacity of the sewer line and treatment facility. The existing treatment facility has surplus capacity to accommodate dry weather flows of up to 100,000 gallons per day, without any improvements. (NOP at pp. 3, 6.)

Second, the NOP refers to measures taken by Crystal Geyser to reduce impacts to surrounding communities, such as the truck access easement that Crystal Geyser recently acquired, which will allow trucks to avoid accessing the bottling facility

through Ski Village Drive and downtown Mount Shasta. Crystal Geyser will continue to engage in voluntary measures as a good neighbor to reduce impacts of the bottling plant to the City and local community. For example, Crystal Geyser recently upgraded the landscaping to improve the entry area and surrounding landscaping around the bottling plant. Crystal Geyser is also looking into energy efficient light fixtures that will reduce nighttime glare from the plant. In commenting on the NOP, however, we note that the City's limited discretionary approval over the bottling plant similarly limits the scope of mitigation measures that the City may impose on the bottling plant pursuant to CEQA. (14 Cal. Code Reg. § 15126.4(a)(2).)

Third, Crystal Geyser recognizes that there are some members of the community who have concerns over the bottling plant, and that these members will continue to express their concerns throughout the CEQA process for the City's sewer upgrade project. The NOP properly identified the baseline to include the bottling facility and its existing physical structures. In addition, Crystal Geyser possesses active permits for the bottling facility, such as a Waste Discharge Requirement permit with the Regional Water Quality Control Board, which previously underwent extensive CEQA review. As our final comment on the NOP, we suggest that the active permits for the bottling plant be factored into the environmental baseline as the City prepares the Draft EIR. (*See, e.g., Citizens for East Shore Parks v. California State Lands Comm.* (2011) 202 Cal.App.4th 549; *accord, North Coast Rivers Alliance v. Westlands Water Dist.* (2014) 227 Cal.App.4th 832.)

We look forward to working with the City throughout the CEQA process. Please do not hesitate to contact me if you have any questions or comments regarding our comments to the NOP.

Best Regards,

CHURCHWELL WHITE LLP

Barbara A. Brenner
Partner

RRB/ems

cc: Client

FitzGerald, Shannon

From:	Vicki Gold <victoria7@snowcrest.net>
Sent:	Thursday, January 08, 2015 6:03 PM
To:	FitzGerald, Shannon
Subject:	Fwd: WWTP Feasibility Study complete
Attachments:	Feasibility Study Presentation.pdf; ATT00001.htm

Hi Shannon,
This is the larger PACE Engineering WWTP Feasibility study with discussion of tertiary or secondary treatment modalities and options under consideration. The City will probably supply this to you and Stan if they haven't already.
I understand that the ball is in the City of Mount Shasta's court now to provide documentation for their rationale of using the grant for the larger state mandated WWTP renovation. Can you inquire as to whether the EDA can require the $3 million match from CGWC?
Thanks so much,
Vicki Gold
530.926.4206

Begin forwarded message:

From: Vicki Gold <victoria7@snowcrest.net>
Subject: WWTP Feasibility Study complete
Date: November 28, 2014 10:26:18 AM PST

CITY OF MT. SHASTA

Draft Wastewater Treatment and Disposal Feasibility Study

by

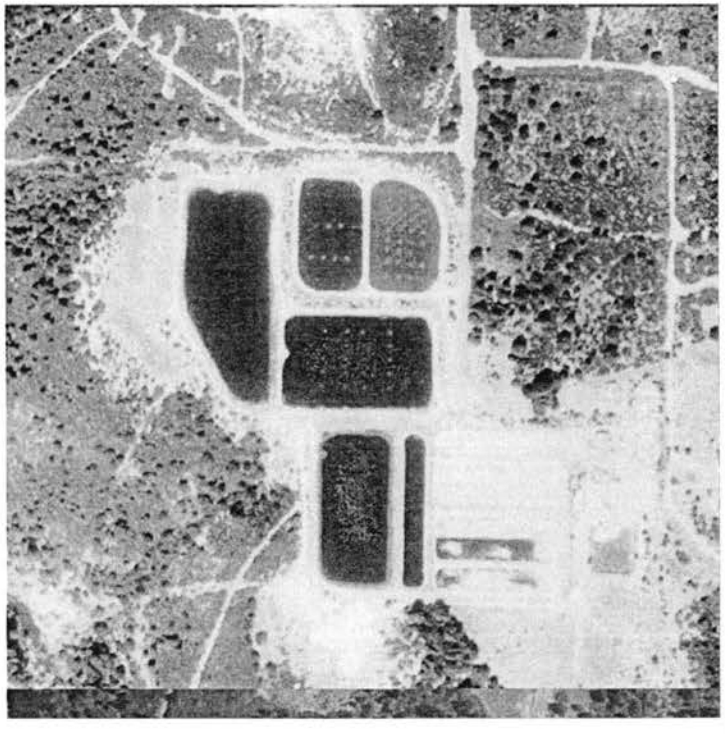
PACE Engineering, Inc.

CITY OF MT. SHASTA
INCORPORATED MAY 31, 1905

PACE
ENGINEERING
REDDING, CALIFORNIA

BACKGROUND

- Timeline
  - 1976 – Original lagoon WWTP constructed
    - Biodegradable organics (BOD, TSS)
  - 1999 – Tertiary treatment improvements (DAF/RSF)
    - Summer flows
    - Extend discharge periods
  - 2007 – CVRWQCB Waste Discharge Requirements & Cease and Desist Order
    - Metal removal (Cu, Zn)
    - Disinfection byproducts



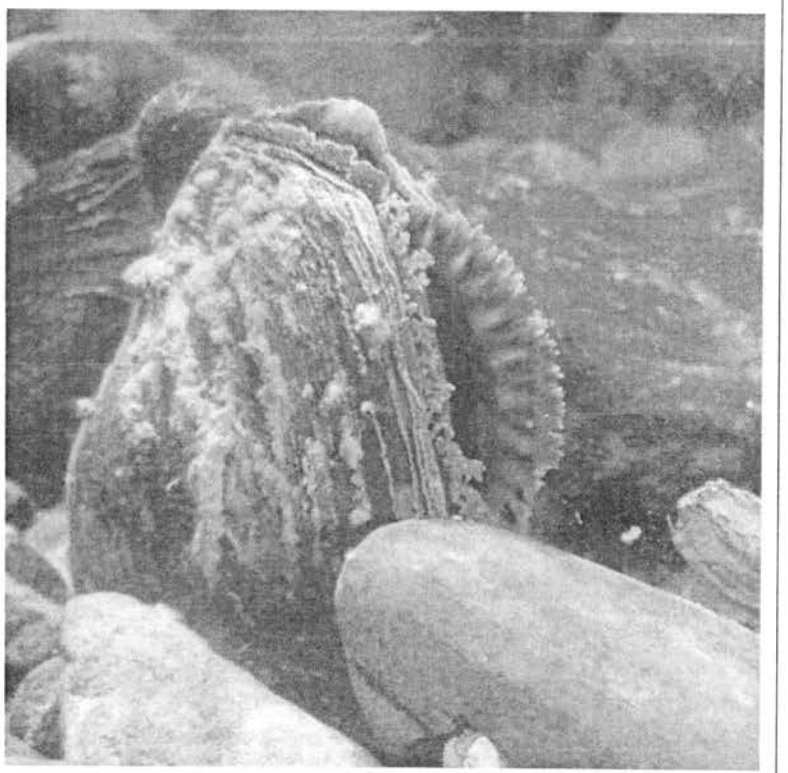
Mt. Shasta WWTP - 1994

BACKGOUND CONT'D

- Timeline
  - 2009 – Mixing Zone Dilution Study
    - Reduction in regulatory metals limit
  - 2012 – Disinfection Monitoring Improvements
    - Provide reliable, flow-paced disinfection
  - 2013 – Treatment & Disposal Feasibility Study
    - NPDES permit compliance
    - Disposal alternatives

BACKGROUND CONT'D

- Timeline
  - 2013 – New EPA Ammonia Criteria
    - More stringent ammonia limits



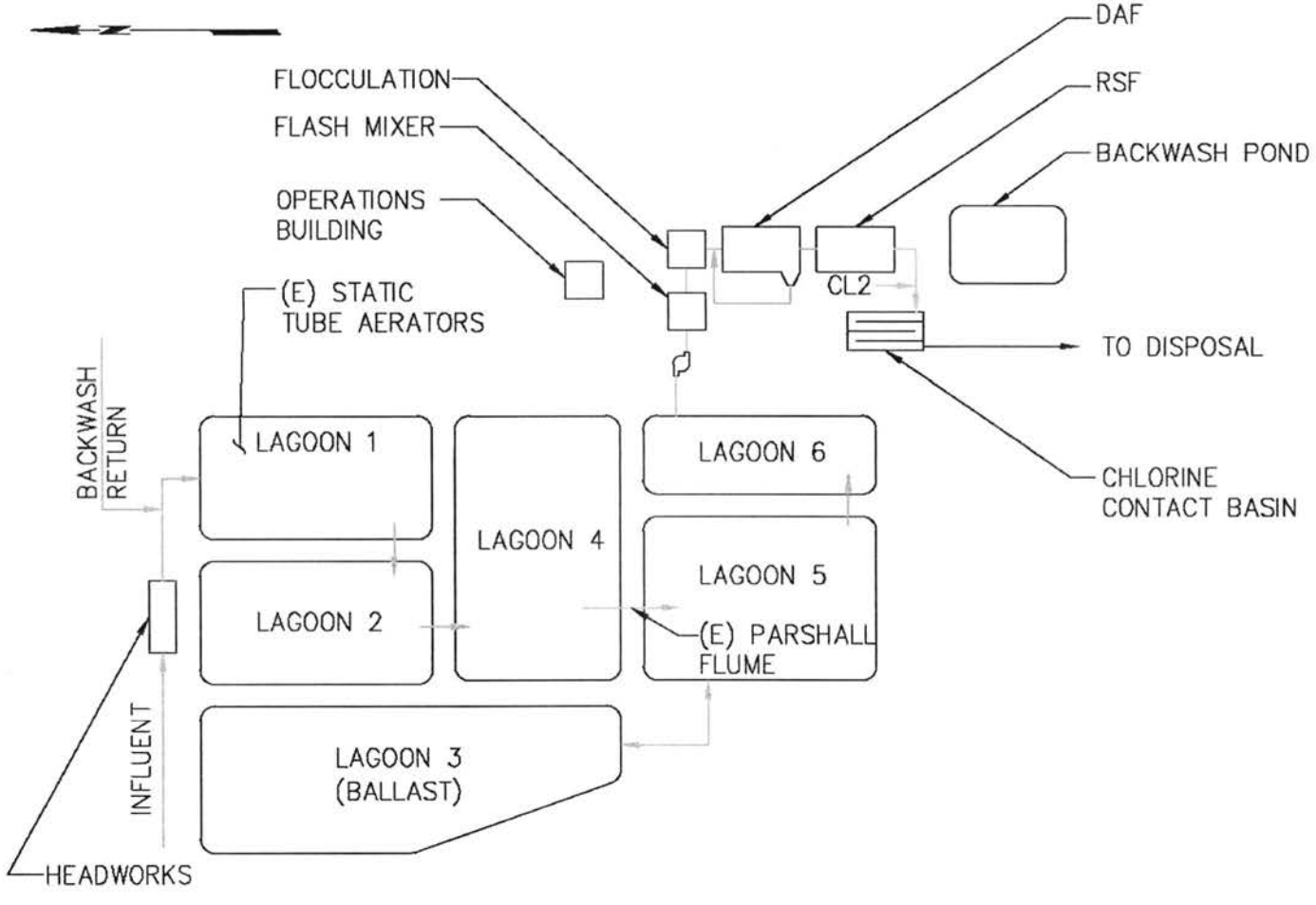
Western Pearlshell Mussel
(*Margaritifera falcate*)
Courtesy US Fish & Wildlife Services

EXISTING SYSTEM

- Existing WWTP Process Components
  - Treatment
  - Disinfection
  - Disposal

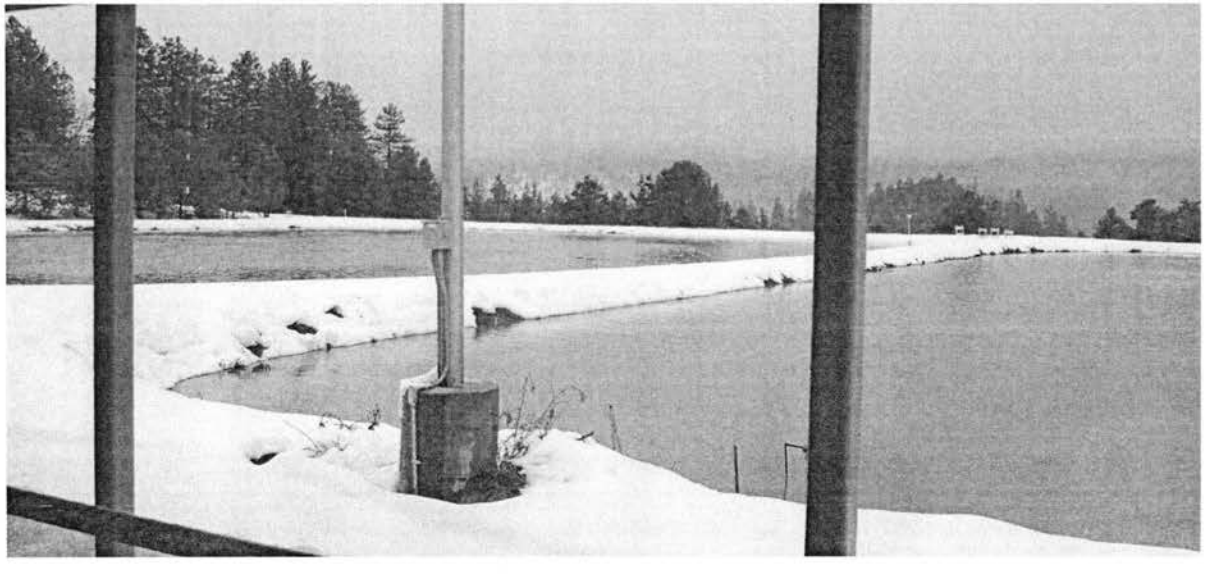
Mt. Shasta WWTP Headworks

EXISTING SYSTEM



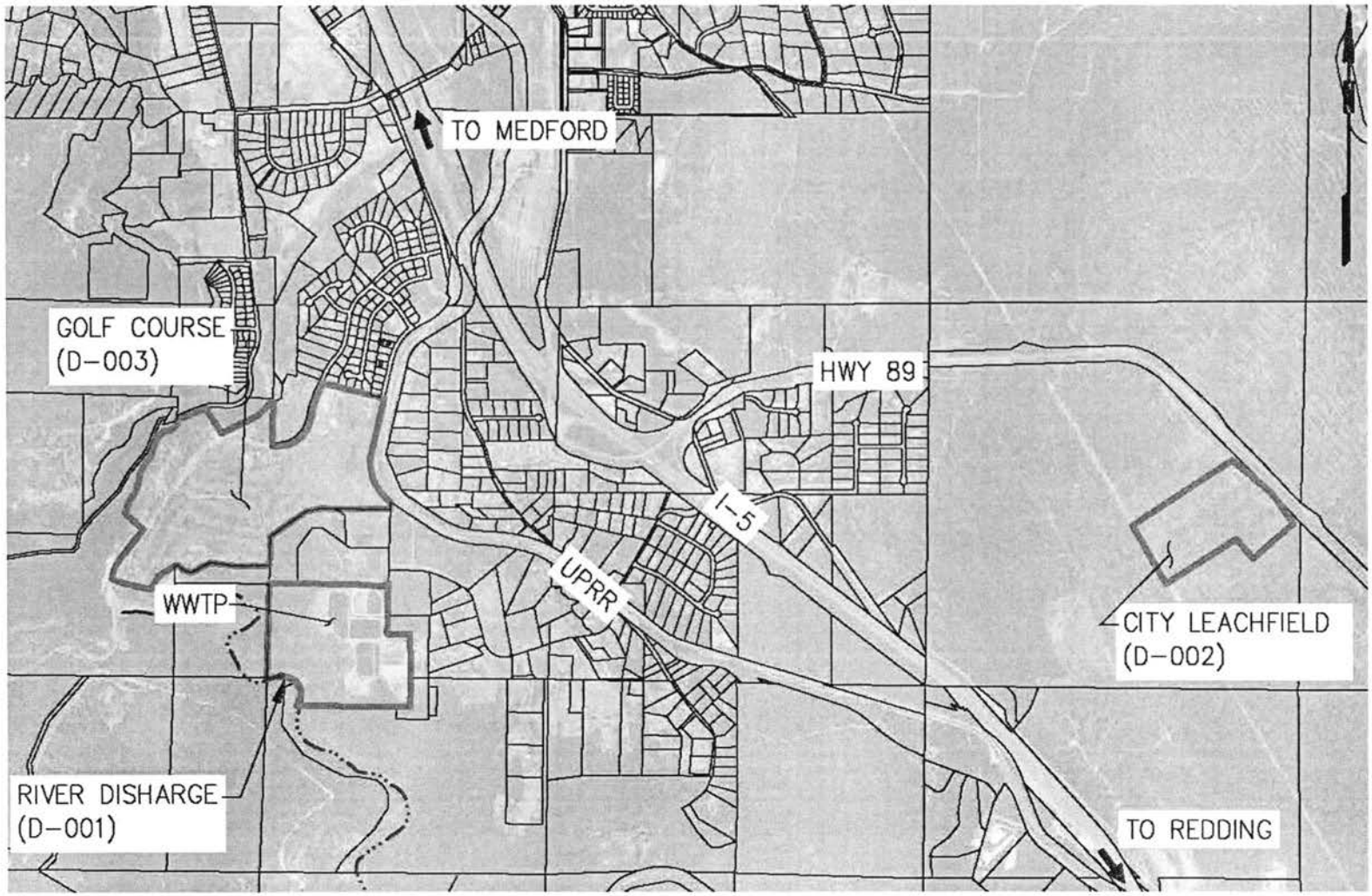
EXISTING SYSTEM

- Treatment Shortfalls
  - Difficult to remove nitrogen in cold weather
  - Ammonia resurgence from decay (New stringent ammonia limits)
  - Limited process control
  - Limited flexibility to meet future regulatory requirements
  - Lack of wintertime filtration capacity



Mt. Shasta Lagoons 1 & 2

EXISTING SYSTEM

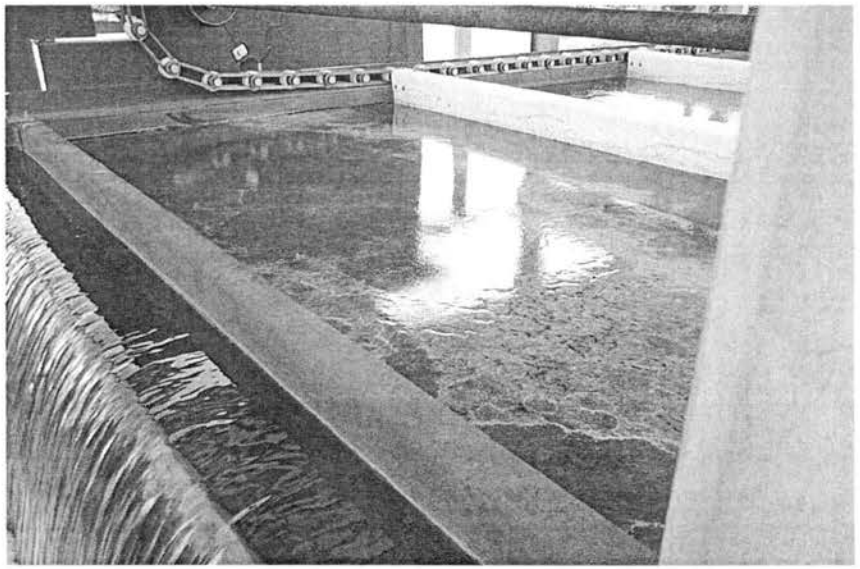


EXISTING SYSTEM

- Existing Disposal Sites
  - Sacramento River (Gravity flow, high degree of treatment)
    - During winter and early spring/late fall periods
  - Leachfield (Pumped, limited treatment)
    - Anytime effluent standards cannot be met
  - Golf Course (Pumped, high degree of treatment)
    - Spring to fall irrigation season

REGULATORY REQUIREMENTS

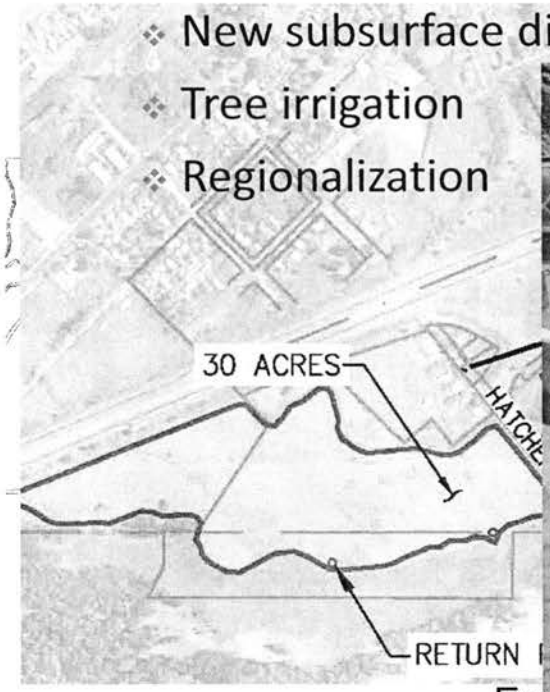
- The City Needs to Identify How it Will Comply With:
  - More stringent metals removal (Cu & Zn)
  - More Stringent nutrient removal (NH4, NO2 & NO3)
  - More stringent disinfection byproducts prevention and/or removal
  - Insufficient treatment capacity (i.e., filtration)
  - Disposal of treated wastewater

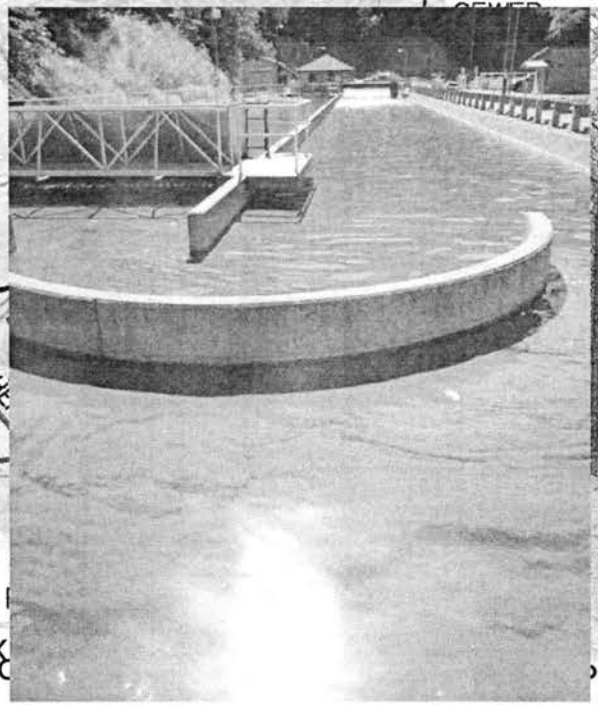


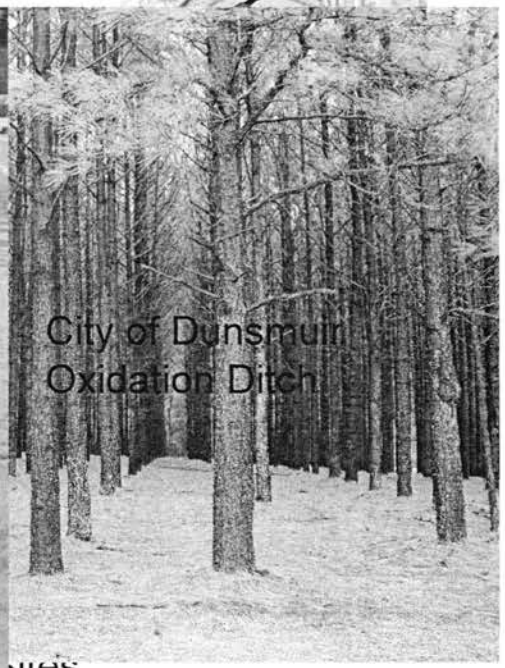
WWTP - DAF

ALTERNATIVES

- Determine Best Feasible Disposal Alternatives
  - 1st - Investigate New Disposal Sites
    - New wetlands/pasture irrigation (Combined 132 acres available)
    - New subsurface disposal (Existing 42 acre site 50% developed)
    - Tree irrigation
    - Regionalization



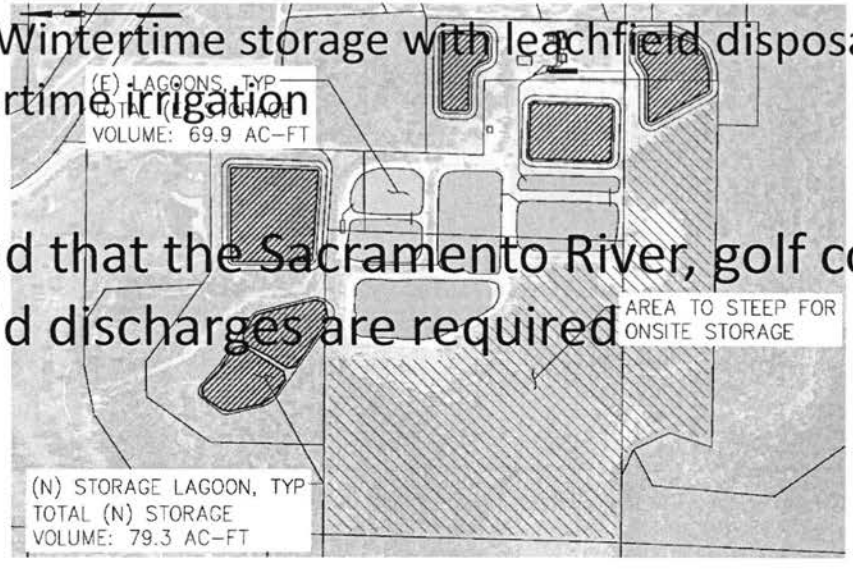




Ex
Propo
ites

ALTERNATIVES

- Determine Best Feasible Disposal Alternatives
  - 2nd - Develop Disposal Alternatives to Stop Sacramento River Discharge
    - Wintertime storage and summertime irrigation
    - Partial Wintertime storage with leachfield disposal and summertime irrigation
  - We found that the Sacramento River, golf course, and leachfield discharges are required



ALTERNATIVES

- Determine required degree of treatment based on best disposal alternative
- Determine Best Feasible Treatment Alternative
  - 7 treatment alternatives
    - 3 utilize/repurpose existing lagoons
    - 4 replace the existing lagoon system

BioLac

CAS

Bio-Shell

AeroMod

MBR

Moving Bed Bioreactor

SBR

ALTERNATIVES

- Best Treatment Alternative
  - Criteria
    - Increase WWTP Capacity
    - Increase process reliability/minimize discharge violations
    - Increase flexibility to meet future discharge requirements
    - Minimize effluent pumping cost (i.e., Leachfield)
    - Increase effluent quality discharged to the Sacramento River
    - Increase water reuse

ALTERNATIVES

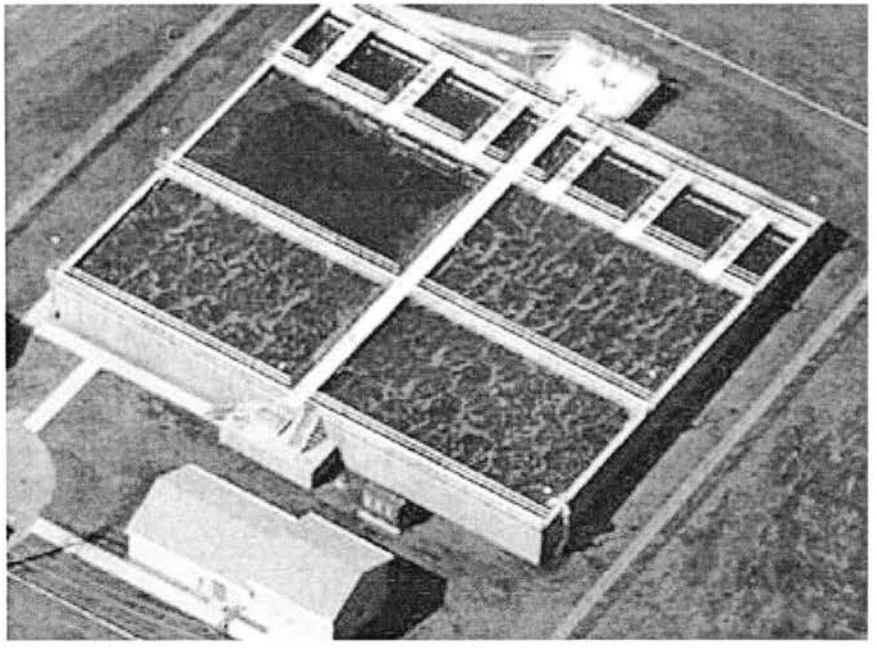
- Determine the best solution for the City based on:
  - Sewer rates
  - Constructability
  - Ease of O&M
  - Ability to adapt/modify to meet future requirements
  - Reliability
  - Safety and security

No.	Criteria	Weight Factors	Treatment Alternatives						
			BioLac	CAS	MBR	SBR	AeroMod	BioShell	MBBR
1	Monthly Wastewater Rate	20	6	3	6	6	7	6	10
2	Environmental & Permitting Constraints*	5	7	8	8	8	8	10	9
3	Constructability & Ability to Implement*	10	7	8	8	8	8	10	8
4	O&M Difficulty	10	6	7	5	6	7	10	8
5	Ability to Adapt/Modify to Meet Future Discharge Requirements	15	6	8	10	8	8	3	4
6	Treatment Process Performance & Reliability	35	7	10	9	10	10	4	6
7	Security & Safety to Workers/Public	5	7	9	10	9	9	6	5
	Weighted Totals:	100	**65%**	**77%**	**81%**	**82%**	**85%**	**59%**	**70%**
		Previous	67%	73%	69%	76%	83%	71%	81%

Decision Matrix

ALTERNATIVES

- Best Treatment Alternative
  - AeroMod's Sequox® Process
    - Activated Sludge - Ludzack-Ettinger (LE) process with a second stage sequencing aeration



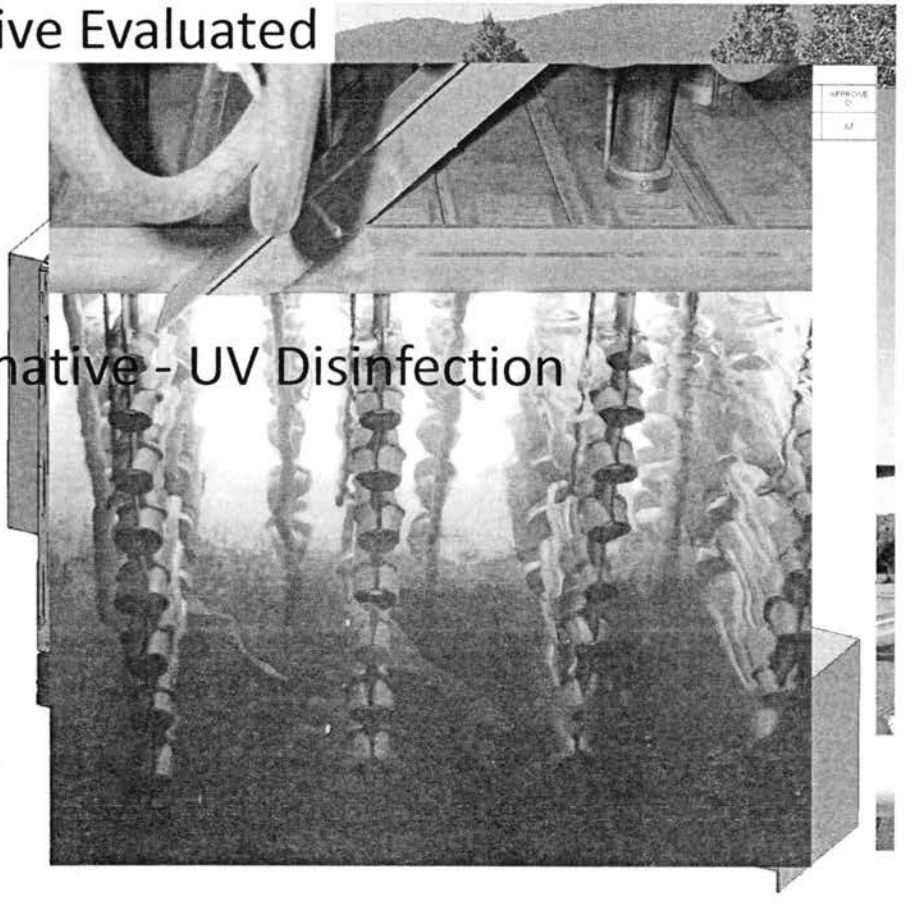
ALTERNATIVES

- Determine Best Disinfection Alternative
  - 4 Disinfection Alternative Evaluated
    - Chlorine Gas
    - Sodium hypochlorite
    - Ozone
    - Ultraviolet (UV)

No.	Criteria	Weigh Factor
1	Project Costs	20
2	O&M Costs	20
3	Likelihood to generate disinfection byproducts	15
4	Ability to Adapt/deal with potential Future Discharge Requirements, i.e. Pharmaceuticals	10
5	Lowest Potential Regulatory Burden, i.e. Least risk for disinfectant to cause a discharge violation	15
6	Security & Safety to Workers/Public	20
	Weighted Totals:	**100**

Decisic

Best Disinfection Alternative - UV Disinfection



ALTERNATIVES

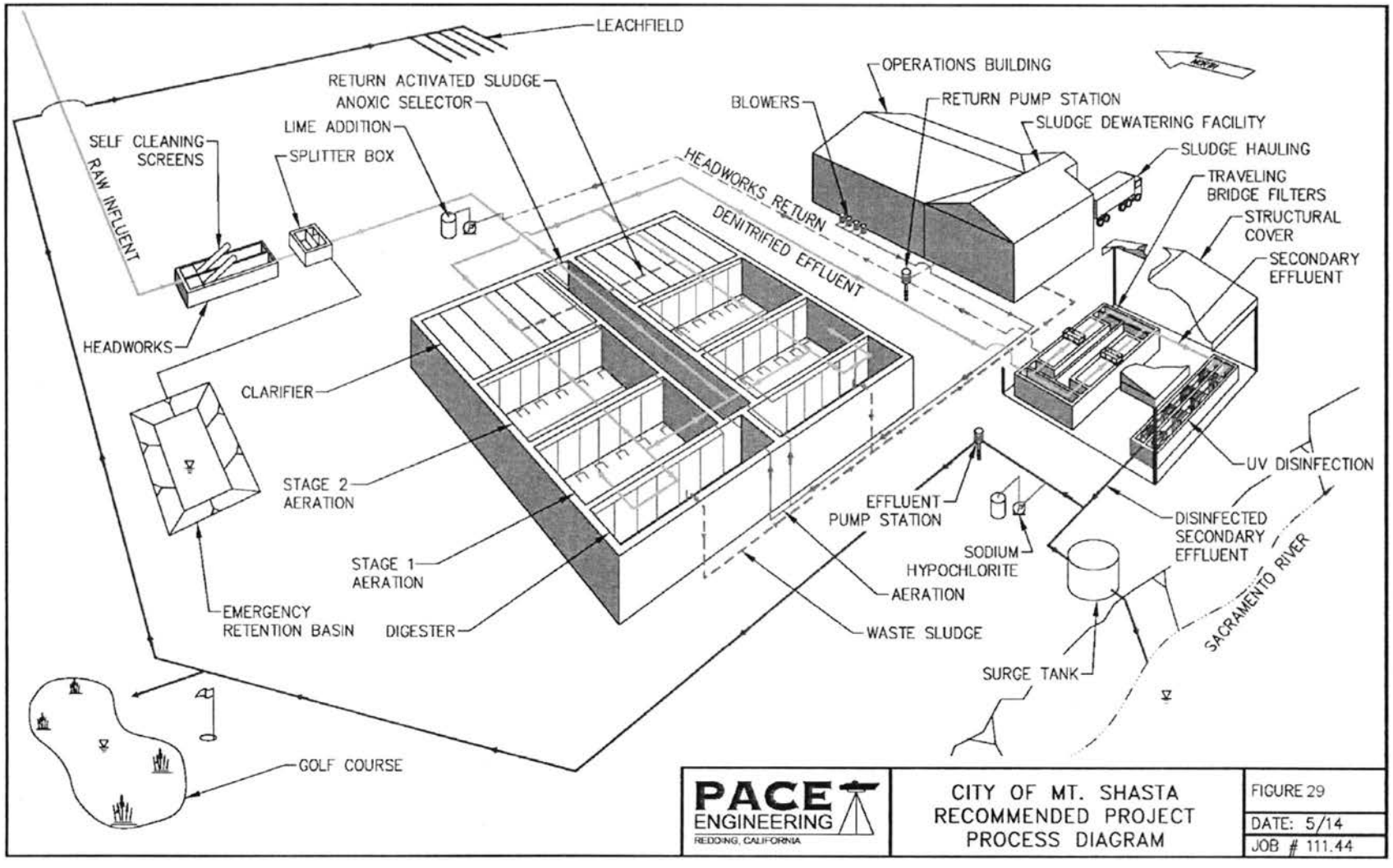
Present Worth Analysis

No.	Project Description	Total Project Cost	New WWTP Annual O&M Cost	Present Worth O&M[(1)]	Net Present Worth[(2)]
WWTP Alternatives					
1	Conventional Activated Sludge Plant	$20,000,000	$903,358	$15,357,602	$35,357,602
2	Aero-Mod Activated Sludge Plant	$16,300,000	$774,238	$13,162,495	$29,462,495
3	Membrane Bioreactor Plant	$14,600,000	$834,959	$14,194,782	$28,794,782
4	Sequencing Batch Reactor Plant	$13,300,000	$794,900	$13,513,766	$26,813,766
5	BioLac Plant	$16,600,000	$844,104	$14,350,255	$30,950,255
6	BioShell Lagoon System	$17,300,000	$691,954	$11,763,627	$29,063,627
7	Moving Bed Bioreactor	$12,000,000	$791,397	$13,454,216	$25,454,216

(1) Present worth based on 1.6% 20 year discount rate. Interest rate based on 20-yr federal discount rate from Appendix C of OMB Circular A-94 per USDA PER guidelines.

(2) Salvage value for all Alternatives is assumed to be zero

RECOMMENDED PROJECT



FINANCING

- Recommended project cost -$16.5M
- Current sewer rate - $23.95
- Sewer rate required to qualify for grant: $48.00 to $53.00
- Potential grant sources
  - USDA Rural Development – Up to $3M
  - CWSRF – Up to $4M
  - CDBG – For low and very low income

FINANCING

- Potential sewer rates with maximum grant: $54.00 & CG contribution
- Rates could be higher if grant and no CG Contribution

FINANCING

SINGLE - FAMILY MONTHLY SEWER BILL COMPARISON

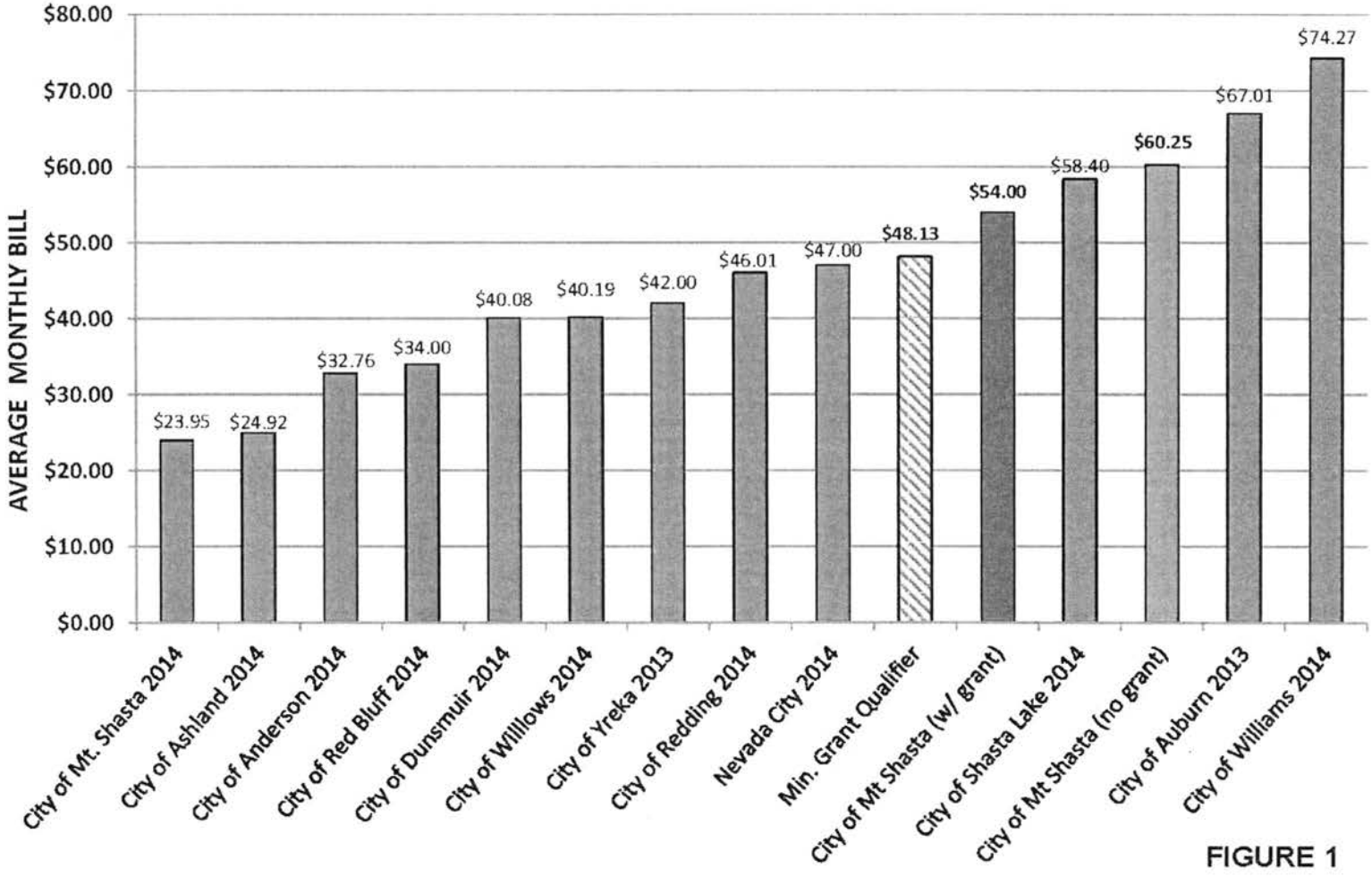


FIGURE 1

STEPS MOVING FORWARD

- Initiate environmental review – Mitigated Negative Declaration
- Prepare and submit applications for funding
  - Maximize grant opportunities
- Consider performing income survey in accordance with USDA and CWSRF guidelines
- Implement Proposition 218 rate increase proceedings

PROJECT SCHEDULING

Task	Estimated Completion Date	NPDES Compliance Date
~~Submit Leach Field Design Investigation~~	~~Feb 28, 2014~~	~~Apr 4, 2014~~
~~Submit Groundwater Monitoring Well Network Tech Report~~	~~Oct-2014~~	~~Apr 4. 2014~~
~~Submit *draft* Wastewater Treatment and Disposal Feasibility~~	~~May 30, 2014~~	~~Jun 1, 2014~~
~~Method of Compliance – Title 22 Disinfection Requirements~~	~~May 30, 2014~~	~~Jun 1, 2014~~
~~Method of Compliance – BOD, TSS, and pH~~	~~May 30, 2014~~	~~Jun 1, 2014~~
~~Method of Compliance – Cu, Zn, and ammonia~~	~~May 30, 2014~~	~~Jun 1, 2014~~
~~Workshop with project stakeholders~~	~~Jun 18, 2014~~	~~-~~
~~Public presentation of *draft* PER~~	~~Jul 21, 2014~~	~~-~~

PROJECT SCHEDULING –CONT'D

Task	Estimated Completion Date	NPDES Compliance Date
~~Submit *final* PER to project stakeholders~~	~~Aug-2014~~	
Initiate environmental review, permitting, and financing options	Oct-2014	Nov 23, 2016
Submit project financing plan to CVRWQCB	Nov-2014	Nov 23, 2014
Adopt project environmental documents	Apr-2015	-
Prepare funding applications for USDA and CWSRF funding	Dec-14 to Apr-15	-
Obtain preliminary project funding commitments	Oct-2015	-
Proposition 218 proceedings	Nov-15 to Mar-16	-
Engineering design	Mar-16 to Dec-16	-
Bidding/award/contract execution	Jan-17 to Apr-17	-
Construct improvements	May-17 to Dec 18	Nov 23, 2018
Final project completion – file Notice of Completion	Jan-2019	-
Compliance with Cu, Zn, ammonia	Apr-2019	Jun 1, 2017
Compliance with BOD, TSS, pH, and Title 22 Disinfection	Apr-2019	Nov 23, 2020
Progress Reports	Jan of each year	Jan of each year

QUESTIONS?

FitzGerald, Shannon

From: FitzGerald, Shannon
Sent: Thursday, January 08, 2015 6:16 PM
To: Good, Stan; Skrinde, Kristine
Subject: FW: WWTP Feasibility Study complete
Attachments: Feasibility Study Presentation.pdf; ATT00001.htm

Hi Stan and Kris,

I just had a long call from Vicki Gold. She sent me this WWTP feasibility study which you might be interested in.

Thanks, Shannon

From: Vicki Gold [mailto:victoria7@snowcrest.net]
Sent: Thursday, January 08, 2015 6:03 PM
To: FitzGerald, Shannon
Subject: Fwd: WWTP Feasibility Study complete

Hi Shannon,
This is the larger PACE Engineering WWTP Feasibility study with discussion of tertiary or secondary treatment modalities and options under consideration. The City will probably supply this to you and Stan if they haven't already.
I understand that the ball is in the City of Mount Shasta's court now to provide documentation for their rationale of using the grant for the larger state mandated WWTP renovation. Can you inquire as to whether the EDA can require the $3 million match from CGWC?
Thanks so much,
Vicki Gold
530.926.4206

Begin forwarded message:

From: Vicki Gold <victoria7@snowcrest.net>
Subject: WWTP Feasibility Study complete
Date: November 28, 2014 10:26:18 AM PST

FitzGerald, Shannon

From: Vicki Gold <victoria7@snowcrest.net>
Sent: Monday, January 12, 2015 10:47 AM
To: FitzGerald, Shannon
Subject: Fwd: W.A.T.E.R Newsletter January 12

Hi Shannon,
I thought you might be interested in this. It just went out this morning.
Vicki

Begin forwarded message:

From: WATER group <mountshastawater@gmail.com>
Subject: W.A.T.E.R Newsletter January 12
Date: January 12, 2015 8:23:50 AM PST
To: Vicki <victoria7@snowcrest.net>
Reply-To: WATER group <mountshastawater@gmail.com>

Even more comments on EIR flood Mount Shasta

The Mount Shasta Herald reported last week that a record 212 comment letters on the Crystal Geyser/ Interceptor line project were submitted to the City. North State Resources and the City 's legal counsel, Pioneer Law Group, will read the comments and propose a scope of the draft EIR based on those comments. We need to ensure that the scoping document includes all of our concerns and includes a thorough investigation of the effects of the Crystal Geyser plant. Most interesting was the comment submitted by Crystal Geyser itself. They assert that they can immediately hook up to the City sewer system through existing sewer lines as long as they do not exceed the maximum capacity of the waste treatment plant. This would mean they could use all remaining capacity with no other users accommodated. They also consider things like truck traffic avoiding downtown to be "voluntary measures as a good neighbor." This shows more than ever why we need mandatory and enforceable limits on Crystal Geyser operations. (See HERE for complete document)

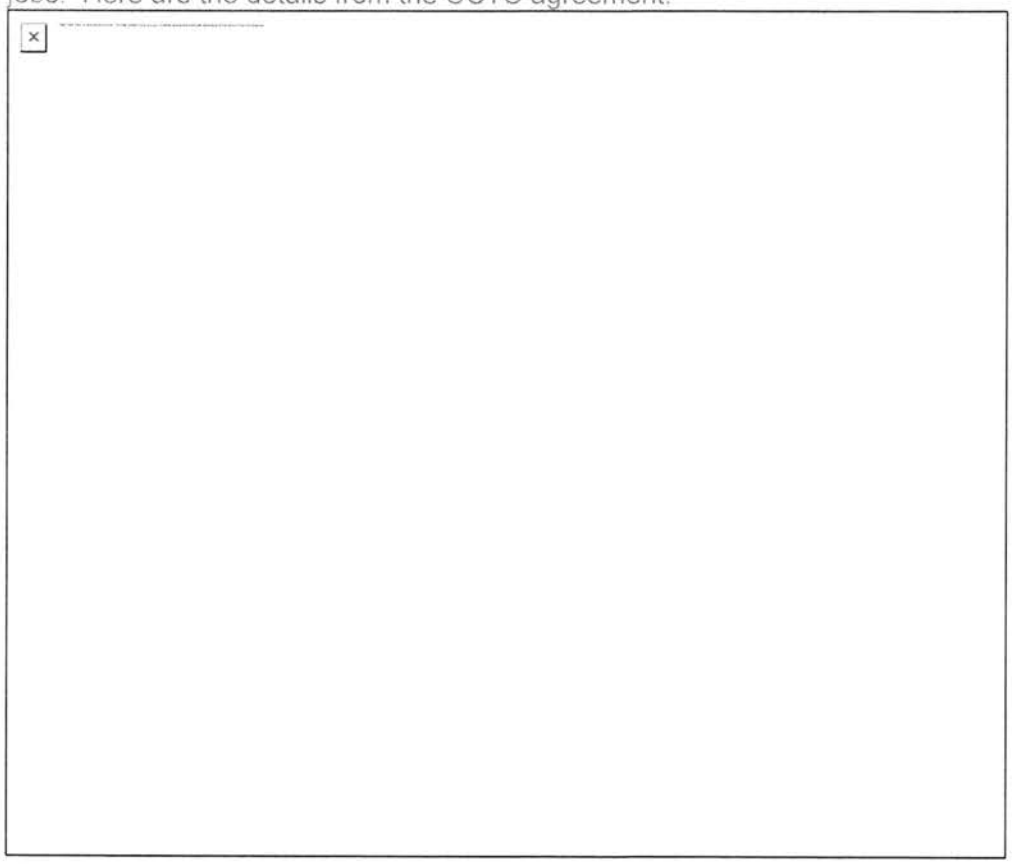
Crystal Geyser plans end run around EIR?

City Manager Paul Eckert told the Mount Shasta Herald that now CG is talking of opening their plant without an EIR by not starting with tea and juice squeeze drinks. Eckert stated: "But now Crystal Geyser is talking about starting with water only. We've verified with our attorneys that if bottling water only is consistent with the existing permit for the facility, they can do that."
(seehttp://www.mtshastanews.com/article/20150102/NEWS/150109986/)
This would be a blatant attempt to evade an EIR and start the plant operations before an EIR can be done. We will need to fight such a bait and switch operation every step of the way.

Crystal Geyser applies to State for corporate welfare.

We have learned that Crystal Geyser has applied to the California Governor's Office of Business and Economic Development (GO-Biz) for a California Competes Tax Credit (CCTC). If awarded, this would give Crystal Geyser $237,500 of our tax dollars to help

them run their tea and juice squeeze drink factory. The ostensible purpose of this tax credit is to help businesses that want to stay or grow in California. However the CCTC agreement document with Crystal Geyser (CG) shows that only 12 jobs will be added by CG over the next three years! My how things have changed. Originally CG claimed 200 jobs would be created (in the EDA grant application), then it was claimed that 50 to 60 jobs would be created; now while asking for a taxpayer handout they reveal a maximum of 12 jobs. Here are the details from the CCTC agreement:



Full document HERE

We are strongly against CG getting our tax dollars while they refuse to agree to an EIR and fight any limits on their water extraction plans. WATER has written a letter to GO-Biz stating our objections. Stay tuned for further developments. See URL HERE to see the documents.

Crystal Geyser neglects fire safety.

On January 8 the Mt. Shasta Area Fire Safe Council met with the Spring Hill fuel reduction project as a key topic of discussion. Crystal Geyser owns Spring Hill. If you have walked up the popular Spring Hill trail you cannot help but notice the dense undergrowth and build up of flammable materials on the hillside. However at the meeting it was reported that each time the Fire Safe Council has approached Crystal

Geyser about brush reduction, they have been told no, they would not allow that on their property. The Fire Safe Council was offering Crystal Geyser a free service, but they have refused. We think that Crystal Geyser should immediately (and with their OWN money) perform the needed fuel reduction on Spring Hill. As we learned from the Boles fire, overgrown hillsides next to town can be VERY dangerous.

Thank You!

Last November WATER received a $2000 matching donation. Due to several generous donations we were able to meet our match! This will help us to pay for environmental experts and legal help as we continue our fight to ensure that Crystal Geyser will not harm our Mount Shasta environment. If you can, please donate athttp://groupspaces.com/WATERS/donate/ or mail checks to **P O Box 1143, Mount Shasta, CA 96067**, made out to **MSBEC** and write ***"FOR WATER"*** in the memo section. WATER is a fiscally sponsored project of the Mount Shasta Bioregional Ecology Center (MSBEC) and donations are tax deductible.

Our mailing address is:
We Advocate Thorough Environmental Reivew
108 B Siskiyou Ave.
Mount Shasta, Ca 96067

FitzGerald, Shannon

From: Vicki Gold <victoria7@snowcrest.net>
Sent: Wednesday, December 10, 2014 6:29 PM
To: FitzGerald, Shannon
Subject: Re: EDA grant Mount Shasta/ Crystal Geyser

Thanks Shannon,
I just heard from Nicole at City that she has the many NOP comments in a file that can be put in a dropbox or sent in a CD.
I requested Dropbox.
They were surprised by the large numbers of comments and she is now covering both City Clerk and Planning issues, way on overload.
Vicki
On Dec 10, 2014, at 3:23 PM, "FitzGerald, Shannon" <SFitzGerald@eda.gov> wrote:

> Hi Vicki,
>
> The project manager should have included information in the pre-award file. I'll ask him to provide that to our Regional Council. In the meantime, I can provide her with the EA in response to the FOIA.
>
> I will request the comment on the NOP from the City.
>
> Thanks, Shannon
>
> -----Original Message-----
> From: Vicki Gold [mailto:victoria7@snowcrest.net]
> Sent: Wednesday, December 10, 2014 1:25 PM
> To: FitzGerald, Shannon
> Cc: Branigan, Michelle
> Subject: Re: EDA grant Mount Shasta/ Crystal Geyser
>
> Hi Shannon,
> Will EDA request those NOP comments from the City? It would be preferable if they did on their own, although we will have access to them through PRR by the end of the month hopefully. I don't believe the EA was included in the FOIA materials I received. I have requested any recent communications in a separate FOIA and wonder if the EA could be included.
> Thanks so much,
> Vicki
> On Dec 10, 2014, at 1:19 PM, "FitzGerald, Shannon" <SFitzGerald@eda.gov> wrote:
>
>> Hi Vicki,
>>
>> EDA prepared EA. When EIRs are prepared, we do want to see them. I've seen the comments on EIRs and the responses incorporated into Final EIRs. It would be interesting to see the comments on the NOP.
>>
>> Thanks for the information. -Shannon
>>
>> -----Original Message-----
>> From: Vicki Gold [mailto:victoria7@snowcrest.net]

>> Sent: Monday, December 08, 2014 11:04 AM
>> To: FitzGerald, Shannon
>> Subject: Re: EDA grant Mount Shasta/ Crystal Geyser
>>
>>
>> Hi Shannon,
>> We have been reviewing the FOIA documents, and I have a question. From the notes and emails we can see that you and Stan Good were asking very good questions about the project's environmental impacts. Thank you for having outlined your concerns so clearly. We continue to ask some of those questions and more. There was a very brief 3 or 4 page environmental assessment by Julian Colescott of Northstate Resources. Was that the only EA?
>>
>> The NOP public and agency response period ended 12/1/14. Although it isn't official, rumor is that there were over 125 letters questioning the project as outlined in the NOP. This is of course indication of substantial controversy in the community. The anonymous call to David Farnworth-Martin was obviously an early attempt to forewarn the EDA of the anticipated rallying of public support questioning the CG project. (He and you were already aware of the Mount Shasta Herald headline announcing no CEQA required by Siskiyou County.) The community recognized this to be non-compliant with CEQA and indicative of the need to engage the City of Mount Shasta immediately as lead agency for the grant and all environmental review. The City knew this in November as well. This was the beginning of the passing of the buck as to who would be paying for the EIR; this remains an important question. I'm sure many of the letters addressed that concern.
>>
>> The group is questioning whether EDA will request a copy of the comment letters from the City. I understand that they scanned all letters before forwarding to PACE Engineering for their summary. PACE is expected to report back to the City Council by January. Since the first meeting is 1/12/15, I assume it will be at that meeting as a regular agenda item.
>>
>> Thanks so much,
>> Vicki Gold
>
>

Parker, Brian

From:	Brian A Parker <brian.a.parker@eda.gov>
Sent:	Thursday, March 07, 2013 2:37 PM
To:	TMarconi@ci.mt-shasta.ca.us
Subject:	EDA Funding Request, Control No. 07123: Required Documentation Missing from Application Package
Attachments:	Application Review Comments - City of Mt. Shasta.docx
Importance:	High

Mr. Marconi:

I am sending this message pursuant to recent communication you have had with Mary Rudokus regarding the referenced grant application. I have performed my own review of the documentation in the file record and have discovered that key required documents are missing from the package.

A list of the items that the City of Mt. Shasta will need to submit are identified in a document that is attached to this message. I understand that the City is working on the Environment Narrative. All of the other items listed are required to be provided for the application to be considered complete, in addition to the Environmental Narrative.

Please, arrange to have the outstanding items submitted, as soon as possible. I realize that the documents are not likely to be submitted here by March 13. However, if they can be sent here within the few weeks after March 13, it would be helpful.

If you have questions or need additional assistance, feel free to contact me.

Thank you for your interest in EDA funding.

Brian

Brian Parker
Economic Development Specialist

Seattle Regional Office
Economic Development Administration
915 Second Avenue, Room 1890
Seattle, Washington 98174-1012
(206) 220-7675 (Voice)
(206) 220-7669 (Fax)
E-Mail: brian.a.parker@eda.gov
World Wide Web: www.eda.gov

Application Review Comments
City of Mt. Shasta
Mount Shasta Sewer Line and Wastewater Treatment Facility Improvement Project

The following forms and documents need to be submitted in addition to those currently included in the application package or some of the items will need to be submitted:

- Engineering Report
- Environmental Narrative
- Environmental Report (Copy of any previously prepared environmental assessment or impact study in existence, if available)
- Documented approval of the planned project from the State Historic Preservation Officer of the State of California

Parker, Brian

From: Brian A Parker <brian.a.parker@eda.gov>
Sent: Tuesday, March 19, 2013 4:39 PM
To: TMarconi@ci.mt-shasta.ca.us
Cc: Mary S Fitzgerald
Subject: EDA Funding Request, Control No. 07123: SHPO Letter Guidance
Attachments: SHPO-THPO Letter Template.docx; Letter to SHIPO - Required Information.docx; Sample Letter to California SHPO.docx

Ted:

I am sending this message pursuant to your request for a template for a letter to the State Historic Preservation Officer (SHPO). A general template and guidance for required information to include in a letter to the SHPO are attached to this message for your reference. A formatted sample letter with some of the blanks filled in is included, as well. It is pretty much set up to be printed on the City of Mt. Shasta's letterhead.

If you have questions or need additional assistance, feel free to contact me.

Thank you for your work.

Brian

Brian Parker
Economic Development Specialist

Seattle Regional Office
Economic Development Administration
915 Second Avenue, Room 1890
Seattle, Washington 98174-1012
(206) 220-7675 (Voice)
(206) 220-7669 (Fax)
E-Mail: brian.a.parker@eda.gov
World Wide Web: www.eda.gov

SAMPLE OF LETTER TO SHPO/THPO

Date:

(*Name of State/Tribal Historic Preservation Officer*)
(*Name of Historic Preservation Officer*)
(*Address*)

RE: National Historic Preservation Act Section 106 consultation for proposed EDA grant assistance to construct (*Project*), (*Location*)

Dear (*Name of State/Tribal Historic Preservation Officer*):

The (*Applicant's Name*) has made an application for grant funding to the U.S. Department of Commerce, Economic Development Administration (EDA) to construct (*General Project Description*). Under 36 CFR §800.2(c)(4), EDA is delegating authority to (*Applicant's Name*) to consult with you on the behalf of EDA.

The project includes (*Provide a detailed description of the project. For SHPO, this description must include depth, width and footprint of the "Area of Potential Effect" of the undertaking. The description must also include any ground disturbing activities or trenching that will occur as a result of the undertaking. Be precise in describing the location of the undertaking. If the undertaking includes the remodel of an existing building, include the date of the original building construction. Also include the description of any known historic or archaeological resources in the immediate area of the project effect (buildings, etc. of local importance). Include maps of the project area and photographs of buildings older than 50 years that will be renovated or demolished*).

In accordance with 36 CFR §800 the (*Applicant's Name*) is initiating the Section 106 consultation process on behalf of EDA.

Enclosed is documentation of the (*Applicant's Name*) effort to identify and evaluate historic properties pursuant to 36 CRF §800.4. This documentation includes:

- Evidence that all interested parties (*this includes Tribes, museums, and organizations*) were consulted pursuant to 36 CFR §800.4(a) (3)-(4);

- Documentation of effort to identify and evaluate historic properties. (*For instance, evidence that a record search was completed at the local Historical Information Center. As a result of this record search, a need for an historical/archaeological resources survey may be indicated. If a survey is, or has been, completed, provide a copy of the survey report*); and

- An assessment of the undertaking's potential to affect historic properties pursuant to 36 CFR §800.4(d) or 36 CFR §800.5. (*Possible determinations are: (1) No historical properties present; (2) No historical properties affected; or (3) Historical properties affected.*)

We ask for your concurrence on these findings and determination. If further information is required, please contact me at (*Applicant's telephone number and email address*).

Sincerely,

(*Name*)
(*Title*)

Enclosures

Copy to: EDA Project Officer

NOTE: For information regarding Section 106 and implementing regulations, please refer to the Advisory Council on Historic Preservation's Web Page at http://www.achp.gov/work106.html

Letter to State Historic Preservation Officer (SHPO) Required Information

EDA designates applicants for EDA project funding as its non-federal representative per 36 CFR Part 800.2 (c)(4) to act on its behalf to consult with the SHPO in determining the impact of a project on cultural resources in the area that may potentially be affected. Applicants are then required by EDA to submit appropriate information to the SHPO for compliance with Section 106 of the National Historic Preservation Act of 1966.

At a minimum, the EDA applicant must provide the SHPO with:

1. **Record Search Results**: Applicants must request a record search from their local Historic Information Center to identify any known historic archaeological resources within the proposed project sites(s) that are listed on the National Register of Historic Places or are considered to be of local and State significant and perhaps eligible for listing on the National Register. Provide copy of records search from Historic Information Center.

2. **Historic/archeological Resources Survey**: As a result of this records search, the need for an historic/archaeological resources survey may be indicated. If a survey has been completed, provide a copy of the survey report. If a survey has been completed, provide a copy of the survey report. If a survey is required but has not been completed, indicate when the survey will be done and forwarded to SHPO and EDA.

3. Evidence that **interested parties** (*such as **Indian Tribes***) were consulted pursuant to 36 CFR §800.4(a) (3)-(4)

4. A narrative description of the proposed project's elements and its location

5. A map of the area surrounding the proposed project, which identifies the project site, adjacent streets and other identifiable objects

6. Line drawings or sketches of the proposed project

7. Photographs of the affected properties if building demolition or renovation is involved; and

8. A request for the SHPO to submit comments on the proposed project to EDA

Although the applicant has the authority to conduct the routine aspects of the consultation, EDA retains the responsibility for any determinations or findings made during the course of the consultation.

The applicant's written correspondence and attachments on behalf of EDA to the SHPO requests SHPO concurrence that the documentation submitted by the applicant is sufficient for the SHPO to complete the consultation process and subsequently provides the necessary SHPO review required in accordance with 36 CFR Part 800.

The SHPO then provides information to the applicant and/or EDA as to whether or not historic-cultural resources are affected by the proposed project, and if so, what mitigation/monitoring measures are required.

{Overwrite and Insert Date}

Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer
Office of Historic Preservation
State of California
1725 23rd Street
Sacramento, California 95816

RE: National Historic Preservation Act Section 106 consultation for proposed EDA grant assistance to construct sewer lines, Mount Shasta, California

Dear Dr. Roland-Nawi:

The City of Mt. Shasta has made an application for grant funding to the U.S. Department of Commerce, Economic Development Administration (EDA) to construct new sewer lines. Under 36 CFR §800.2(c)(4), EDA is delegating authority to the City of Mt. Shasta to consult with you on the behalf of EDA.

The project includes (*Provide a detailed description of the project. For SHPO, this description must include depth, width and footprint of the "Area of Potential Effect" of the undertaking. The description must also include any ground disturbing activities or trenching that will occur as a result of the undertaking. Be precise in describing the location of the undertaking. If the undertaking includes the remodel of an existing building, include the date of the original building construction. Also include the description of any known historic or archaeological resources in the immediate area of the project effect (buildings, etc. of local importance). Include maps of the project area and photographs of buildings older than 50 years that will be renovated or demolished*).

In accordance with 36 CFR §800 the City of Mt. Shasta is initiating the Section 106 consultation process on behalf of EDA.

Enclosed is documentation of the City of Mt. Shasta's effort to identify and evaluate historic properties pursuant to 36 CRF §800.4. This documentation includes:

- Evidence that all interested parties (*this includes Tribes, museums, and organizations*) were consulted pursuant to 36 CFR §800.4(a) (3)-(4);

- Documentation of effort to identify and evaluate historic properties. (*For instance, evidence that a record search was completed at the local Historical Information Center. As a result of this record search, a need for an historical/archaeological resources survey may be indicated. If a survey is, or has been, completed, provide a copy of the survey report*); and

An assessment of the undertaking's potential to affect historic properties pursuant to 36 CFR §800.4(d) or 36 CFR §800.5. (*Possible determinations are: (1) No historical properties present; (2) No historical properties affected; or (3) Historical properties affected.*)

We ask for your concurrence on these findings and determination. If further information is required, please contact me at {*Overwrite and Insert Telephone Number and/or E-Mail Address}*.

Sincerely,

Theodore Marconi
City Manager

Enclosures

c: Brian Parker, Economic Development Administration

Parker, Brian

From: Ted Marconi <TMarconi@ci.mt-shasta.ca.us>
Sent: Tuesday, March 05, 2013 6:11 PM
To: Mary R Rudokas
Cc: Brian A Parker
Subject: RE: new project officer and where is the environmental stuff?

Mary,

We have reached a definite YES on the reconsideration. We are now working on the environmental narrative and will submit it electronically by the 13th. I could not figure out how to do it without engaging a consultant so we have done so. Hopefully that will put us ahead of the game when we begin the project. We have made contact with ACoE and FWS as well as CalTrans.

Brian, I can get you the letter requesting consideration tomorrow if that would be helpful. We had thought to submit it all at once on the 13th.

P.S. Does anyone have any idea if sequestration is going to impact this next round, and if so how.

Ted Marconi
City Manager
City of Mt. Shasta
From: mary.r.rudokas@eda.gov [mailto:mary.r.rudokas@eda.gov]
Sent: Tuesday, March 05, 2013 5:49 PM
To: Ted Marconi
Cc: brian.a.parker@eda.gov
Subject: new project officer and where is the environmental stuff?

Dear Ted,
I will be going on detail April 1, so there has been a reshuffling of duties in the office. Your new project officer is the very capable and friendly Brian Parker. He has your project folder, all of the emails and the application mods made through the last cycle. He is awaiting the YES we want to be reconsidered during the next cycle... due AT THE LATEST, by March 13. Remember, a new app is not needed but it would be beneficial to your consideration if the environmental narrative were complete and conveyed to Brian at that time.

I look forward to hearing great things about Mt. Shasta! Good luck.

Brian's contact information is:
Brian Parker
206 220 7675
Brian.a.Parker@eda.gov

Sincerely,
Mary

Mary Rudokas | Civil Engineer | Economic Development Administration | Tel (206) 220-7694 | Fax (206) 220-7669

-----"Ted Marconi" <TMarconi@ci.mt-shasta.ca.us> wrote: -----

To: <mary.r.rudokas@eda.gov>
From: "Ted Marconi" <TMarconi@ci.mt-shasta.ca.us>
Date: 01/22/2013 04:43PM
Subject: RE: IRC environmental review of Mt. Shasta application

Thank you Mary. I will put everyone to work as soon as I receive your official letter.

Ted Marconi
City Manager
City of Mt. Shasta

Parker, Brian

From: Ted Marconi <TMarconi@ci.mt-shasta.ca.us>
Sent: Tuesday, March 12, 2013 4:21 PM
To: Brian A Parker
Subject: Mt. Shasta Application
Attachments: EDA Reconsider Request.pdf; EDA Engr Repts.pdf

Mr. Parker,

As noted previously the City of Mt. Shasta wishes to have its application for funding reconsidered in the current round. Attached in this and subsequent e-mails are a letter formally requesting such reconsideration and supplemental documentation supporting that application. We believe all of the requested documentation is included except for the approval from SHPO, which per your application instructions was not to even be applied for until after project approval.

Ted Marconi
City Manager
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CITY OF MT. SHASTA

305 North Mt. Shasta Boulevard
Mt. Shasta, California 96067
(530) 926-7510 • Telephone
(530) 926-0339 • Fax

March 12, 2013

A. Leonard Smith, Regional Director
U.S. Department of Commerce
Economic Development Administration
915 Second Avenue, Room 1890
Seattle, WA 98174

Dear Mr. Smith,

The City of Mt. Shasta wishes to have our application for funding for the FY 2013 Economic Development Assistance Programs carried forward to the upcoming funding cycle.

The City has prepared additional supporting documentation and has forwarded it to the assigned Project Manager as of this date.

Thank you very much for your reconsideration of our application. We look forward to being able to work with EDA on this project. If further information is required, please contact me at (530) 926-7510, or cityofms@nctv.com.

Sincerely,

Theodore E Marconi

Theodore E. Marconi,
City Manager
City of Mt. Shasta

STAGED WASTEWATER TREATMENT PLANT EXPANSION

The existing treatment plant was initially designed for an ADWF of 0.7 MGD and a PWWF of 2.1 MGD. As discussed in the previous chapter, there have been a number of modifications to the oxidation lagoon system over the years and the initial intermittent sand filter system was replaced with a flotation thickener/filtration system in 1999.

The 2002 ADWF has been estimated at about 0.59 MGD, but this may include some quantity of overflow from the golf course effluent storage pond. The 24-hour PWWF on December 14, 2002, was recorded at 2.6 MGD and the 15-minute peak flow could have been in excess of 3.0 MGD, but the headworks is subject to overflows at about that flow rate and the Parshall flume is subject to surcharging so the actual peak is unknown. In addition, one would expect that if the current restriction in the upstream interceptor is removed, the PWWF will probably increase somewhat.

Based upon our analysis, it appears that the existing oxidation lagoon system, with some limited modifications, can probably handle an ADWF of about 0.75 MGD. At the estimated growth rate of 1.0 percent per year, this flow rate would be reached by about 2025. In order to handle ADWFs of greater than 0.75 MGD, it will be necessary to expand the oxidation lagoon system by either adding the two new lagoons in front of the existing lagoons as shown in the 1992 Master Sewer Plan or by constructing a new lagoon where the inactive intermittent sand filters are located. In addition, the DAF system has a maximum capacity of 1.0 MGD. Thus, these existing facilities impact the available plant capacity as the ADWFs and the shoulder period (spring and fall) flows approach 1.0 MGD.

Since the discharge requirements for discharge to the City's reclamation site are not as restrictive as the discharge to the Sacramento River, it may be possible to blend some of the secondary effluent with filtered effluent and discharge it to the reclamation site during the shoulder periods. However, this will involve additional pumping cost and is somewhat contingent on the effluent solids from the lagoon system not getting too high.

Based upon measurements taken by City staff, Lagoon No. 2 has an average of about 2 feet of sludge and Lagoon No. 1 has an average of about 1.2 feet of sludge. This sludge accumulation not only reduces the hydraulic detention time available, but also adds to the oxygen requirements of the lagoon system and reduces the efficiency of the treatment facility.

If the influent ADWFs do increase at 1 percent per year, then the Stage 2 improvement would need to be completed by about 2025.

Figure 2 at the end of this report indicates a layout of the existing and proposed major wastewater treatment facilities. Project cost estimates for the Stage 1 and Stage 2 Improvements are shown in Table 3. These order of magnitude cost estimates are based on June 2004 dollars and include an allowance for engineering and contingencies. However, they do not include allowances for inflation or financing costs.

Date: 10/16/2003
Job No: 111.23
File Name: WWPTCostest

TABLE 3

Preliminary Project Cost Estimate for Wastewater Treatment Plant Staged Expansion Program

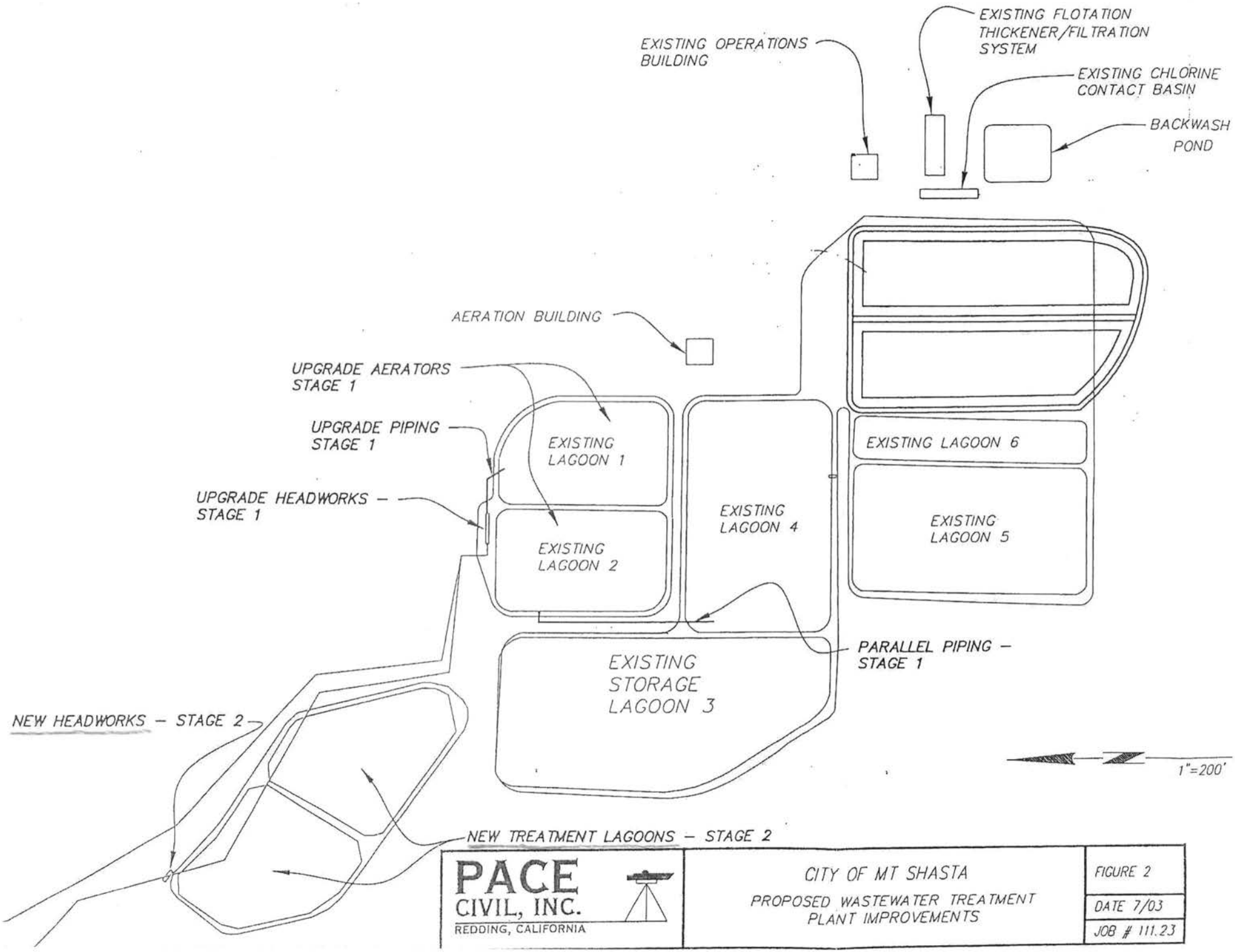
ITEM NO.	DESCRIPTION	ESTIMATED COSTS	COMMENTS
	STAGE 1 IMPROVEMENTS (Year 2004 to 2005)		
1	Expand Headworks capacity	$55,000	Prevent overflows and improve flow measurement capability
2	Increase pipeline size to Lagoon No. 1	$15,000	Prevent overflows and improve flow measurement capability
3	Parallel pipeline from Lagoon No. 2 to Lagoon No. 4	$65,000	Eliminate need to bypass Lagoon No.2 during high flow conditions
4	Plant hydraulic analysis and develop a high flow management plan	$8,000	Verify need for needed piping improvements and provide a more reliable and less labor intensive operation.
5	Upgrade aerators in Lagoon Nos. 1, 2, and 4	$150,000	Increase BOD removal capacity
6	Sludge removal from Lagoon Nos. 1 and 2 with dredge equipped with submersible pump system	$60,000	Improve BOD removal capabilities
7	Mechanical dewatering of sludge removed from Lagoon Nos. 1 & 2	$500,000	Centifuge dewatering cost estimate. Consider using Lagoon No. 3 or old filter beds for dewatering and drying.
8	Dried sludge hauling and disposal cost	????	
	SUBTOTAL	$853,000	
	STAGE 1 IMPROVEMENTS (Year 2006 TO 2010)		
1	Replace 750 feet of river outfall with 24-inch pipeline and parallel 550 feet with 18-inch pipeline.	$145,000	Increase capacity of river outfall to 5.0MGD, if confirmed by results of Item 4 above.
	SUBTOTAL	$145,000	
	TOTAL STAGE 1 IMPROVEMENTS	**$998,000**	

Date: 10/16/2003
Job No: 111.23
File Name: WWPTCostest

TABLE 3

Preliminary Project Cost Estimate for Wastewater Treatment Plant Staged Expansion Program

ITEM NO.	DESCRIPTION	ESTIMATED COSTS	COMMENTS
	STAGE 2 IMPROVEMENTS		
1	Add two new aerated lagoons totaling 8.5MG with clay liner and fencing	$1,435,000	Increase BOD removal capacity
2	Headworks for new lagoons	$108,000	Increase BOD removal capacity
3	Modify effluent piping to allow for discharge of blended Lagoon and filtered effluent to reclamation site	$50,000	Increase plant capacity during shoulder periods by providing for discharge of blended effluent to reclamation site.
4	Increase Reclamation Effluent Pumps to 200 HP, if necessary	$200,000	Increase discharge capacity during no-river discharge period
5	Allowance for increasing capacity of existing lagoon piping	$102,000	
6	Electrical modifications and additions	$81,000	
7	Miscellaneous improvements	$54,000	
	TOTAL STAGE 2 IMPROVEMENTS	**$2,030,000**	



PACE CIVIL, INC.
REDDING, CALIFORNIA

CITY OF MT SHASTA
PROPOSED WASTEWATER TREATMENT PLANT IMPROVEMENTS

FIGURE 2
DATE 7/03
JOB # 111.23

Mt. Shasta Sewer Capacity Analysis for Crystal Geysers

PREPARED FOR: File

COPY TO: Paul Reuter/PACE Engineering

PREPARED BY: Nancy Maschke/CH2M HILL
Peter Rude/CH2M HILL

DATE: December 13, 2012

CH2M HILL has conducted a preliminary sewer system capacity analysis to determine if there is a need for the City of Mt. Shasta to make improvements to accommodate a 0.675 million gallons per day (mgd) flow increase from Crystal Geysers bottling facility. PACE Engineering has provided CH2M HILL with H20MAP Version 9.0 Hydraulic Model results for 2010 Peak Wet Weather Flow (PWWF) of 3.5 mgd. The max flows from the H20MAP model were used as the existing conditions in this analysis. PACE Engineering has also provided CH2M HILL with pipe diameters, lengths, invert elevations, and Manning's n values for each section of pipe from the Crystal Geysers connection at manhole 620 to manhole 6 at the downstream end near the City's wastewater treatment plant (WWTP).

In summary, 15 pipes from manholes 19-20 and 21-35 were found to be undersized with the addition of 0.675 mgd. Please see the attachments for the pipe capacity calculations and the below explanation of each attachment.

TABLE 1
Summary of Sewer Replacement with the Addition of 0.675 mgd from Crystal Geysers
Mt. Shasta Sewer Capacity Analysis for Crystal Geysers

Result	15 pipes over capacity
Manholes	19-20 and 21-35
From Diameter (in)	12
To Diameter (in)	1-24in, 2-21in, 6-18in, and 3-15in
Total Length (ft)	6134.5

Attachment 1 – Existing Flows and Capacity

Some of the existing data that has been provided from PACE engineering can be found in this attachment. Link ID provides the upstream to downstream manhole number of each pipe segment. The top of the column is the most upstream, and the bottom is the most downstream to the WWTP. Calculated flow is based off velocity calculated by Equation 1 – Manning's Equation and the wetted area. Cells highlighted in yellow provide updated information from Pace Engineering on December 12, 2012.

EQUATION 1
Manning's Equation for Open Channel Flow
Mt. Shasta Sewer Capacity Analysis for Crystal Geysers

$$v = \left(\frac{1}{n}\right) R^{\frac{2}{3}} \sqrt{s}$$

Where:

v = velocity

n = Manning's n roughness

R = Hydraulic radius

s = slope

Existing capacity was calculated based on a d/D of 0.8. The same Manning's equation was used to determine the greatest allowable flow in each pipe segment. The only difference between the existing table and the existing capacity table is that flow was based on a 0.8 d/D and not the observed d/D.

This analysis is assuming that at its peak, Crystal Geysers will release 0.675 mgd of wastewater to the treatment plant.

When determining whether the pipes are over capacity with the addition of the 0.675 mgd, the total flow including the existing max flow conditions plus the future Crystal Geysers flow was subtracted from the calculated capacity using a d/D of 0.8. Those cells highlighted in rose color were found to be over capacity. Here, the condition of d/D of 0.8 cannot be met, and these pipes must be upgraded to meet the new demand on the system.

Attachment 2 – Proposed Updated Diameters and Excess Capacity

To accommodate Crystal Geysers' flow, the rose colored pipes in Attachment 1 must be sized greater to meet the new need. Using Manning's equation again, the pipes were up-sized from 12 inches in order to be within capacity. The new size of each pipe and its new capacity can be found in this attachment. The total flow encompassing the existing conditions plus the 0.675 mgd from Crystal Geysers was subtracted from the new calculated capacity to find the new excess capacity. Now, all pipes have met the future capacity needs.

New Pipe Diameter Capacity (0.8 d/D)

Link: ID	Diameter (in)	Max Flow (MGD)	d/D	Manning's n	Calculated Flow (MGD)
620-619	12	0.009	0.8	0.013	4.03
619-618	12	0.009	0.8	0.013	4.03
618-617	12	0.009	0.8	0.013	4.03
617-615	12	0.009	0.8	0.013	4.03
615-613	12	0.009	0.8	0.013	1.77
613-612	12	0.008	0.8	0.013	1.77
612-611	12	0.008	0.8	0.013	1.61
611-610	12	0.044	0.8	0.013	1.33
610-609	12	0.027	0.8	0.013	1.68
609-608	12	0.026	0.8	0.013	3.23
608-607	12	0.026	0.8	0.013	3.24
607-606	12	0.026	0.8	0.013	2.55
606-605	12	0.026	0.8	0.013	2.55
605-604	12	0.025	0.8	0.013	2.07
604-603	12	0.036	0.8	0.013	3.22
603-602	12	0.036	0.8	0.013	3.22
602-601	12	0.036	0.8	0.013	1.78
601-405	12	0.036	0.8	0.013	1.78
405-404	12	2.202	0.8	0.013	4.80
404-403A	18	2.743	0.8	0.013	13.44
403A-403	12	2.893	0.8	0.013	4.57
403-402	12	2.893	0.8	0.013	4.54
402-401	12	2.893	0.8	0.013	4.21
401-35	12	2.89	0.8	0.013	5.78
35-34	15	2.889	0.8	0.013	4.05
34-33	15	2.884	0.8	0.013	4.70
33-32	15	2.876	0.8	0.013	4.70
32-31	18	3.33	0.8	0.013	7.64
31-30	18	3.323	0.8	0.013	7.65
30-29	18	3.315	0.8	0.013	7.64
29-28	18	3.42	0.8	0.013	6.25
28-27	18	3.408	0.8	0.013	6.25
27-26	18	3.408	0.8	0.013	6.86
26-25	18	3.408	0.8	0.013	6.87
25-24	18	3.407	0.8	0.013	6.86
24-23	18	3.406	0.8	0.013	6.88
23-22	21	3.404	0.8	0.013	8.10
22-21	21	3.403	0.8	0.013	7.19
21-20	24	3.4	0.8	0.013	13.24
20-19	24	3.859	0.8	0.013	15.91
19-18B	30	3.857	0.8	0.013	14.78
18B-18A	30	3.851	0.8	0.013	11.17
18A-18	30	3.846	0.8	0.013	25.35
18-17	24	3.842	0.8	0.013	20.74
17-16	24	3.84	0.8	0.013	17.44
16-15	24	3.837	0.8	0.013	12.13
15-14	24	3.835	0.8	0.013	12.04
14-13	24	3.827	0.8	0.013	14.92
13-12	24	3.822	0.8	0.013	21.92
12-11	24	3.821	0.8	0.013	9.85
11-10	24	3.818	0.8	0.013	12.93
10-9	18	3.817	0.8	0.013	5.07
9-8	18	3.817	0.8	0.013	8.83
8-7	18	3.817	0.8	0.013	8.63
7-6	18	3.817	0.8	0.013	7.74

Red background cells denotes new diameter.

Parker, Brian

From: Ted Marconi <TMarconi@ci.mt-shasta.ca.us>
Sent: Tuesday, March 12, 2013 4:24 PM
To: Brian A Parker
Subject: Mt. Shasta App-Additional Docs
Attachments: EDA Env Narrative 1.pdf; EDA Topo & Nat Wet Inv Maps.pdf

Here is the Env narrative and first of maps.

Ted Marconi
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FY 2013 Economic Development Assistance Program
Mt. Shasta Wastewater System Upgrade
Environmental Narrative

A. BENEFICIARIES

Direct beneficiaries of the project will be Crystal Geyser Water Company which proposes to purchase and reopen the Coca Cola water bottling facility north of Mt. Shasta, and Coca Cola which will realize the proceeds of the sale. Other direct beneficiaries will be holders of undeveloped infill property in north and central Mt. Shasta who may not be able to develop without upgrades to the sewer interceptor line.

B. PROJECT DESCRIPTION

1. Proposed Construction: The City of Mt. Shasta proposes to upgrade an existing 12" main sewer interceptor line to 18" to 30" sewer interceptor line. The project will involve replacing approximately 7,000 feet of line and associated manholes, located in Sections 16 and 21 of Township 40N Range 4W in Siskiyou County, California, approximately between 41°18'N, 122°19'W and 41°17'N, 122°18'W. The project will take place within the existing 20' wide easements and right of way. The project will entail trenching and laying of new parallel pipe and disposing in place the existing pipe. The project will require boring and jacking under the Interstate 5 Freeway where an existing crossing already exists.

The project will cross the alignment of Cold Creek and at least two delineated wetlands areas. The project area was previously disturbed in the 1970's when the current existing line was installed. One of the wetlands area is used as pasture land and one of the areas has been reclaimed and/or enhanced as a wetlands mitigation bank. None of the project area is considered to be flood plain.

The project also proposes to create two new ponds with earthen dikes and associated headworks facilities at the existing wastewater treatment facility located in Section 28 T40N R4W approximately 41°16'N, 122°19'W. The project will entail excavation and compaction of material to create the ponds and concrete work and associated piping for the headworks and connecting the ponds to the existing facility.

2. Alternatives to the Project: The No-Project alternative would leave the existing line in place and would prevent the reuse of the existing Coca Cola spring water bottling facility by Crystal Geyser for bottling flavored waters and teas. This alternative would also mean that the City of Mt. Shasta would have to curtail future developments in the northern and central areas of the City at some future point.

An alternative alignment that bypasses the wetlands areas and reroutes the interceptor line in existing roadways would require the installation and ongoing operation of lift stations, the acquisition of new rights of way and easements, and the disruption of travel and replacing of roadway after construction. The costs, both current and future, of this alternative are considerably higher than the proposed project.

3. Mitigation: Best management practices for construction activities include those for erosion control, siltation control, air quality, and noise will be implemented. Minimization of impacts to wetlands can be achieved through stockpiling and replacing removed top soils to maintain the existing riparian species, replanting with compatible species, and additional enhancements to the disturbed areas.

C. HISTORIC/ARCHEOLOGICAL RESOURCES

A records search (W13-31) was conducted for the City by Northstate Resources, Inc. at the Northeast Information Center (NEIC) on February 28, 2012. The search included the cultural resource records and survey reports as well as the lists of resources on the National Register of Historic Places (NRHP), the California Historical Landmarks listing, the California Register of Historical Resources (CRHR), and the California Points of Historical Interest. Seven cultural resources surveys have been conducted within 0.25 miles the undertaking. Five cultural resources have been recorded within 0.25 miles of the undertaking (see Table). The resources documented in the search radius include one prehistoric site and four historic-era sites. No resources listed on the National Register or any of the California lists are located in or within 0.25 miles of the project. Although no surveys have been conducted within the Project area, and no cultural resources have been identified in the Project area, the previous surveys indicate that there is a moderate probability for cultural resources, both prehistoric and historic-era, to be present.

Site Number	Type	Distance from Project
CA-SIS-4095	Prehistoric	0.07 miles
CA-SIS-3889	Historic-Era	0.20 miles
CA-SIS-3888	Historic-Era	0.08 miles
CA-SIS-2558	Historic-Era	0.25 miles
CA-SIS-2446	Historic-Era	0.18 miles

There are a number of Native American tribal organizations with historical ties in the surrounding area. Although no other sites are believed to be in the project area, the most likely occurrences would be associated with the Winnemem Wintu Tribe, the Pit River Tribe, the Shasta Nation, and the Modoc Tribe. (A list of all tribal contacts is attached).

D. AFFECTED ENVIRONMENT

1. Affected Area: The project affects two areas, the lands that the interceptor line passes through, and the Wastewater Treatment plant. In general, the project's affected area is in the planning area of the City of Mt. Shasta. The City of Mt. Shasta is located in southern Siskiyou County at the southwest base of Mount Shasta, a 14, 162-foot volcanic peak in the Cascade Mountains of Northern California. The City of Mt Shasta and the immediate vicinity of the project is a montane mixed conifer and pasture environment with flat and rolling topography west of the city. The area is mostly within the Strawberry Valley, but comes close to the Sacramento River above the rim of a box canyon immediately downstream of Siskiyou Lake. The city of Mount Shasta and the project area are approximately 3600 ft. elevation at the City limit, and decreases to approximately 3400 feet.

The affected area includes lands that are immediately within, and adjacent to, an existing 20 foot wide easement that extends approximately 7000 linear feet from the terminus of West Jessie Street immediately east of Interstate 5, then under the Interstate 5 Right of Way (ROW), through an existing

residential neighborhood within the ROW of West Jessie Street and then south through undeveloped lands containing delineated wetlands and the channel for Cold Creek. The channel exits the wetland area and travels through very low density single family residential lands. The project area then intersects the ROW of North Old Stage Road and follows in the ROW briefly for approximately 500 feet then veers into open lands through wet pasture land until it intersects the West Ream Ave ROW and connects to the a manhole located approximately 500 feet south of West Ream Ave.

The affected area of the pond work is within the current wastewater treatment plant property located at Grant Road southwest of the City of Mt. Shasta. The project will add two additional ponds to the northwest of the existing ponds. The project site is almost all uplands, but is adjacent and in proximity to identified wetlands areas.

2. Shorelines, Estuaries, Beaches and Dunes: No river banks (shorelines), beaches or dunes will be affected by this project. This is not a designated coastal zone. There are no over-water structures as a part of this project.

3. Wetlands: Waters of the United States ("waters") are present in the Project area. Features observed include the large wet meadow complex (streams and wetlands), and roadside ditches. Prior to implementation of the project, all "waters" shall be mapped according to the U.S. Army Corps of Engineers (Corps) standards. The "wetland delineation" shall be submitted to the Corps for verification. Impacts to "waters" are likely due to the trenching required to construct the project. Prior to construction, the appropriate Clean Water Act Sections 401 and 404 permits shall be obtained authorizing the project. (National Wetlands Inventory maps are attached).

Adequate mitigation is required as a permit condition. Likely, the project would have to restore the temporary effects of the construction by recontouring the impacted area to pre-existing contours, replacing the top soil, and replanting the alignment with native wetland plant species. Because the wetland south of Hatchery Lane was created as mitigation for a past development, the City of Mt. Shasta will also have to research whether the Corps, or any other regulatory agency, placed restrictions (e.g., deed restriction, conservation easement) upon the area as a condition of its use as a mitigation area

4. Floodplains: There are no floodplains that will be affected by this project. The City is not located in an area that is mapped by FEMA for floodplains. (See attached Map).

5. Vegetation and wildlife resources: There are a variety of land uses and therefore a variety of vegetation and wildlife resources along Project alignment including open space, rural residential, small farms, and urban (sewer plant, roads and highways). The Project alignment would traverse several different plant community types including wet meadow, pasture, and mixed chaparral. It also crosses Interstate Highway 5 and several other area streets. Dominant plants observed during the "drive by" survey and other descriptive information from each land use type include the following:

- Rural residential, small farms - The rural residential areas include widely spaced homes with large lots and scattered small farmsteads. The lots are landscaped or left in a natural form, and the small farms largely consist of open pastures with scattered outbuildings. Dominant plants observed include: black oak (*Quercus kelloggii*), Russian olive (*Elaeagnus angustifolia*), black locust (*Robina pseudoacacia*), ponderosa pine (*Pinus ponderosa*), willow (*Salix* sp.) shrub and tree forms, Himalayan blackberry (*Rubus armemiacus*), Scotchbroom (*Cytisus scoparius*), sweet pea (*Lathyrus latifolius*), and orchard grass (*Dactylis glomerata*).

- Open space - The large wetland area located near the northern end of the sewer pipe alignment, south of Hatchery Lane is a complex of wetlands with small streams, old ditches, and ponds, as well as pockets of fresh emergent wetland and seasonal wetlands. This wet meadow was formerly used as pasture, and then in the 1970's set aside as a wetland mitigation area for the development of the Mt. Shasta Shopping Center. The dominant vegetation observed includes willow shrubs, cattail (*Typha latifolia*), common tule (*Schoenoplectus acutus*), wetland grasses [e.g., spreading bent grass (*Agrostis stolonifera*)], sedges (*Carex* sp.), and rushes [e.g., Baltic rush (*Juncus balticus*)].

- Urban - The wastewater treatment plant occurs in an area directly south of the Mt. Shasta Resort golf course, in an area dominated by greenleaf manzanita (*Arctostaphylos patula*), young ponderosa pine, incense cedar (*Calocedrus decurrens*), bitter cherry (*Prunus emarginata*), scattered willow shrubs, young black oak, and various upland herbaceous species. The existing treatment ponds support fringe wetland vegetation and a host of waterfowl (e.g., ducks and grebes). The site is approximately 0.1 mile from the Sacramento River canyon ("Box Canyon").

- Interstate Highway – I-5 is a four-lane freeway, with an on-ramp in the north-bound lanes, and an off-ramp on the south-bound lanes. Roadside ditches occur on both sides of the freeway and supported flowing water during the March 1, 2013 site visit. Wetland vegetation including willows, sedges and wetland grasses were observed in the ditch features.

6. Endangered Species:

Botanical. No state or federally listed plants species are likely to occur in the project area. The four special-status plant species with potential to occur on the Project area are CNPS RPR 1b and 2-ranked species. Species designated as RPR Lists 1b or 2 are not protected under the federal or state Endangered Species Acts, but they are commonly considered by lead agencies under the California Environmental Quality Act (CEQA) review process. The following RPR plant species occur in wetland habitat types, and could be affected by the Project: *Epilobium oreganum*-Oregon fireweed; *Geum aleppicum* -Aleppo avens; *Ophioglossum pusillum*-Northern adder's tongue; and *Scutellaria galericulata*-Marsh skullcap. If such special status plants are identified during a pre-construction survey, their locations will be mapped and avoided or if unavoidable appropriate conservation measures will be implemented.

Wildlife. No federally listed wildlife species have the potential to occur within the Project area. One federal candidate for listing (Pacific fisher) has the potential to occur. Three state-listed species have potential to occur (willow flycatcher, greater sandhill crane and bald eagle). Several California species of special concern may occur within the Project area (foothill yellow-legged frog, Cascades frog, northwestern pond turtle, and yellow warbler).

Pacific fisher is a widely distributed mammal that occurs throughout the Sierra Nevada, Cascades and California Coast Ranges. Pacific fisher is a highly mobile species with a large home range. Fishers den in large trees, snags, logs, rock areas or slash piles, and they may occur in areas impacted by humans (e.g., small towns, farms) in search of food. They may traverse wetland areas, or utilize stream corridors as travel routes. The project area does not support typical denning features, but may be utilized by Pacific fishers during foraging. Recommendations provided below for birds would result in late summer/fall construction, which would correspond to the time when no immobile young are present. All juvenile and adult fishers would flee from the construction and would not likely be affected by the project.

Willow flycatcher, greater sandhill crane and bald eagle are state-listed birds that may be present in the vicinity of the project. Yellow warbler is a California species of special concern that may also nest in the area. Willow flycatchers and yellow warblers nest in willow shrubs in mosaic wetland/stream complexes. Greater sandhill cranes nest in large wetland areas, and bald eagles nest in large snags typically near large streams or lakes. Both the willow flycatcher and sandhill cranes may nest in the large wetland south of Hatchery Lane. Bald eagles may nest along the Box Canyon near the wastewater treatment plant. (Preliminary Assessment reports and Section 7 Consult Letter are attached).

7. Land Use and Zoning: The project is in two jurisdictions, the City of Mt. Shasta and the County of Siskiyou. Within the City limits, the project starts in as neighborhood zoned R-1, single family residential and immediately crosses underneath the Interstate 5 ROW. At the other side of the Interstate, the project area is along the West Jesse Street ROW in an area that is currently zoned (C-1) commercial but is primarily single family detached housing. The project then leaves the City of Mt. Shasta jurisdiction passes through relatively large open spaced land which is zoned for residential with a 1 acre minimum lot size (R-R-B-1). Farther south, the land use changes to be inhabited with single family residential and is zoned R-R-B-5. (Single Family with 5 acre minimums). The project then crosses a large tract of non-prime agricultural property used for pasture zoned Non-Prime Ag Land.

The primaries beneficiaries are community wide, but specifically industry utilizing the interceptor lines are surrounded by various development. For example the zoning at the northern end of the City of Mt. Shasta is typically residential, but there are pockets of industrial land use adjacent to the site. The water bottling facility is located in industrial zoning, and has been in operation previously but closed in the last few years. (Siskiyou County zoning map is attached).

8. Solid Waste Management: The Project facilities themselves will produce no solid wastes. Trenching spoils and waste piping as a result of construction will be disposed of in appropriate fill areas outside of any wetlands. The primary beneficiary will produce solid wastes typical of bottling facilities including plastic, cardboard, packing materials. California law requires that major commercial and industrial operations implement recycling programs for these materials. Solid wastes for the entire County are transported to local transfer stations and then ultimately to out of area landfills, so there is no single disposal facility that is impacted.

9. Hazardous or Toxic Substances: No hazardous or radioactive substances will be used or produced by the project facilities or primary beneficiary. The project area does not contain any known hazardous or toxic substances. Construction vehicles and equipment will have gasoline and/or diesel engines and other automotive fluids. The affected area does not have any of the materials currently listed on the California Cortese list (CGC Section 65962.5). Spills from refueling will be minimized by establishing fixed fueling stations outside of the wetlands areas to minimize contamination by accidental spills. Hazardous materials regulation and enforcement in Siskiyou County is managed by the Siskiyou County Health Department, and Central Valley regional Water Quality Control Board.

10. Water resources: The only water course that will be impacted is the small stream, Cold Creek. The creek emerges from the ground immediately east of Mt. Shasta and at the project site meanders in a large open area that has been developed as a wetland mitigation bank. The disturbance to this stream will be temporary and will have a less than significant impact. Mitigation measures will be implemented as described in the section for wetlands and other biological resources. The effluent from the ponds to be created at the wastewater treatment facility will enter the facility and eventually discharge to the

Sacramento River during the winter season. The facility is operated under NPDES Permit CA 0078051 which sets effluent limitation limits for discharge.

11. Water Supply and Distribution System: The project will require no domestic water supply. The primary beneficiary obtains water from a series of private wells at their location. These wells and their output are used for production, domestic use, and fire suppression capability. The wells are regulated by the Siskiyou County Public Health Department and permitted by the California Department of Water Resources. The primary beneficiary could ultimately utilize up to a million gallons per day for production.

12. Wastewater Collection and Treatment Facilities: The project facilities are for wastewater conveyance and treatment. The treatment system consists of headworks, four oxidation/stabilization ponds, ballast lagoon, dosing basin, dissolved air flotation system, intermittent backwash filter, chlorine contact chamber, dechlorination system and discharge line. Treated Wastewater can be discharged to any of three locations, depending on water quality and time of year: the Sacramento River, a leach field located adjacent to highway 89, or Title 22 reclaimed water to the Mt. Shasta Resort Golf Course.

The primary beneficiary will create industrial effluent with constituents of juice residues and disinfection process components, primarily peracetic acid. Amounts could ultimately reach 0.75 million gallons per day (MGD). The current facility is rated for 0.8 MGD with average daily flows of 0.6 MGD and peak flows during extreme wet weather of 2 to 3 MGD. This project is designed to increase the capacity of the conveyance system to handle an additional 0.75 MGD, and the facility to handle an additional 0.25 MGD which will be required for the initial operations of the primary beneficiary. The facility does not currently meet the final effluent limitations established by the Regional Water Quality Control Board and is operating under interim limitations in the current NPDES Permit. The City is currently in the process of conducting a feasibility analysis of additional upgrades to the facility to meet new effluent discharge requirements and the additional loading from the bottling facility at ultimate buildout. These changes will then be part of a future project to be implemented in the next 5 to 7 years.

13. Environmental Justice: This project does not disproportionately affect minorities or lower income populations nor does it divide communities. The project is the upgrading of wastewater interceptor line replacing an existing older line. The affected area is typically low/very low density single family housing.

14. Transportation: The transportation systems, both local streets and regional roads, will not change as a result of this project. Most of the project site is not in existing roadways. The wastewater line intersects existing right of way (ROW) in three locations. The project includes boring under the Interstate 5 ROW, and flows along the right of way along West Jessie Street west of the Interstate and along S. Old Stage Road. No permanent impacts will occur as a result of the project. Construction will result in temporary interruptions of traffic when working in the ROW. Best management practices will be used for traffic control at those locations.

15. Air Quality: The project is located in Siskiyou County and is part of the Northwest Plateau Air Basin. The basin currently has no air quality plans in place, however Siskiyou County is in full attainment of federal and state ambient air quality standards. The project will involve the underground installation wastewater lines, and constructing additional ponds at the treatment plant. Construction will have temporary and localized impacts to air quality from digging and earthmoving. Equipment used during construction may contribute to temporary localized impacts to air quality from diesel and gasoline engines. Depending on weather conditions the City will incorporate best management practices for dust

control measures during construction. The addition of ponds at the waste water treatment plant will not have any long term impact on air quality.

16. Noise Pollution: The completed project will not contribute to an increase in noise or create new noise sources. The construction will contribute to ambient noise in the affected area although temporary. The addition of ponds will not contribute to additional noise. Best practices for noise mitigation will be implemented such as limiting the time for construction. Connecting to existing infrastructure also may include operation of a bypass pump if needed. Any pumping equipment will have residential grade muffler to limit noise levels.

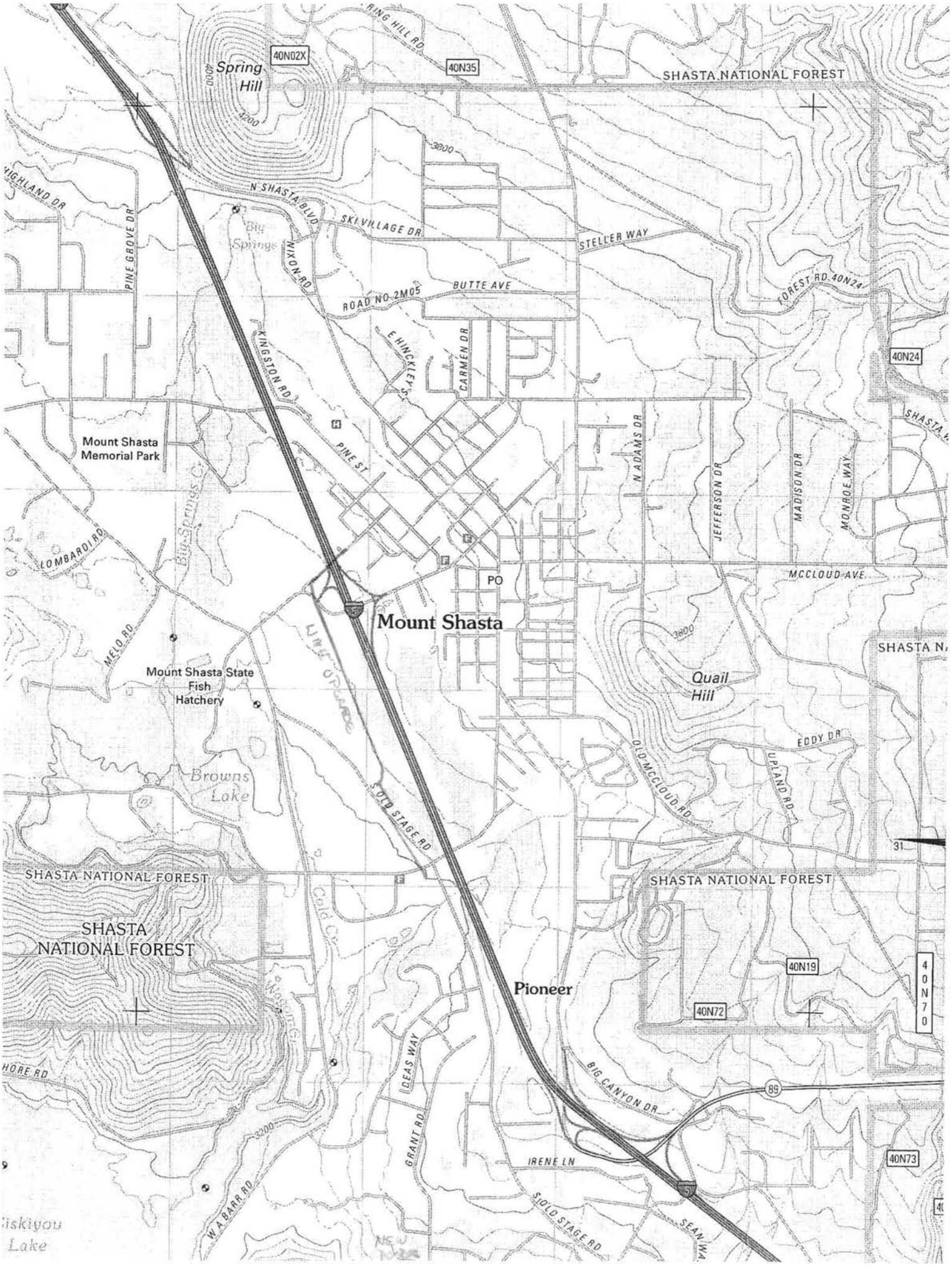
17. Permits: The Project will require an Army Corps of Engineers 404 Permit for operation in the wetlands areas. It will also require temporary encroachment permits from the California Department of Transportation and the Siskiyou County Public Works Department for construction in the ROW. As noted the City already holds an NPDES permit for operation of the wastewater treatment facility. (ACOE application is attached).

18. Public Notification/Controversy: The City has discussed the proposed project at City Council meetings, but no formal public hearings have yet been conducted. These will take place as part of the California Environmental Quality Act process, which requires a public review and comment period prior to project adoption, once the project has been fully designed. Public and reviewing agencies will be provided opportunity to submit comments written and at a public hearing. No formal hearings have been scheduled at this time, but as environmental documents are generated times and dates for public participation will be determined. Methods for public outreach are incorporated into the CEQA compliance process such as press releases, public notices, posting on city web-pages, and direct mailings to those immediately adjacent to the project.

19. Direct, Indirect, and Cumulative Effects: There are no foreseeable indirect or cumulative effects of this project on the environment that cannot be mitigated during the course of construction. While the project increases the size of the interceptor line, it does not extend its reach to new areas that are not already being served by the existing sewer collection system. It will facilitate the development of infill parcels within the current service area where there are already capacity issues, but the effects would be less than significant, or in the case of any unforeseen large project would have to be mitigated as part of such a project. The direct effects of the construction phase of the project will be rendered less than significant by the mitigation measures outlined in the preceding sections. The improvements will allow the reopening of a water bottling facility, and the increase in available jobs could affect traffic, air quality and other areas impacted by a concomitant increase in population, but impacts would not exceed those experienced when employment levels were higher than at present.

E. LIST OF ATTACHMENTS

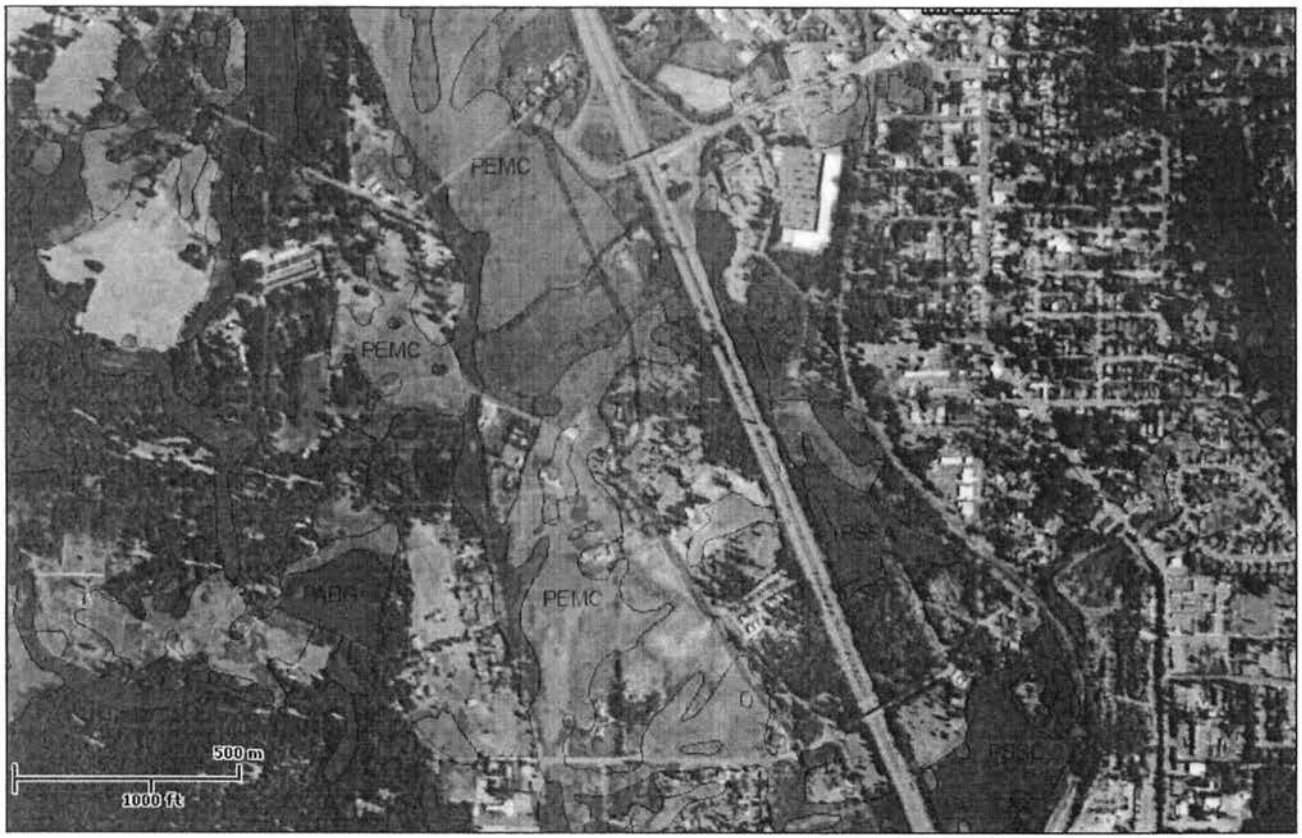
- USGS Topographical Map of Project Area
- Tribal Consultation Contacts
- NFWS Wetlands Inventory Maps
- FIRM Floodplain Map
- Northstate Resources Preliminary Assessments
- USFWS Section 7 Request
- Siskiyou County Zoning Map
- Army Corps of Engineers Permit Application


Spring Hill
40N02X
RING HILL RD
40N35
SHASTA NATIONAL FOREST
4000
4200
3800
HIGHLAND DR
PINE GROVE DR
N SHASTA BLVD
SKI VILLAGE DR
STELLER WAY
Big Springs
NIXON RD
BUTTE AVE
ROAD NO 2M05
FOREST RD 40N24
E HINCKLEY ST
CARMEN DR
40N24
KINGSTON RD
PINE ST
Mount Shasta Memorial Park
N ADAMS DR
JEFFERSON DR
MADISON DR
MONROE WAY
SHASTA V
LOMBARDI RD
Big Springs Ck
PO
MCCLOUD AVE
Mount Shasta
MELO RD
Mount Shasta State Fish Hatchery
Upper Ouse
3800
SHASTA N
Quail Hill
EDDY DR
OLD MCCLOUD RD
UPLAND RD
Browns Lake
OLD STAGE RD
31
SHASTA NATIONAL FOREST
SHASTA NATIONAL FOREST
SHASTA NATIONAL FOREST
Cold Ck
Pioneer
40N19
40N72
40N70
HORE RD
IDEAS WAY
BIG CANYON DR
89
3200
GRANT RD
IRENE LN
40N73
W A BARR RD
SIOLD STAGE RD
SEAN WA
Iskiyou Lake

U.S. Fish and Wildlife Service
National Wetlands Inventory

EDA Sewer Project

Feb 8, 2013



Wetlands

- Freshwater Emergent
- Freshwater Forested/Shrub
- Estuarine and Marine Deepwater
- Estuarine and Marine
- Freshwater Pond
- Lake
- Riverine
- Other

Status

- Digital
- Scan
- Non-Digital
- No Data

User Remarks: SEWER LINE LOCATION

U.S. Fish and Wildlife Service
National Wetlands Inventory

EPA Lagoon Project Area

Mar 11, 2013

Wetlands

- Freshwater Emergent
- Freshwater Forested/Shrub
- Estuarine and Marine Deepwater
- Estuarine and Marine
- Freshwater Pond
- Lake
- Riverine
- Other

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

User Remarks:

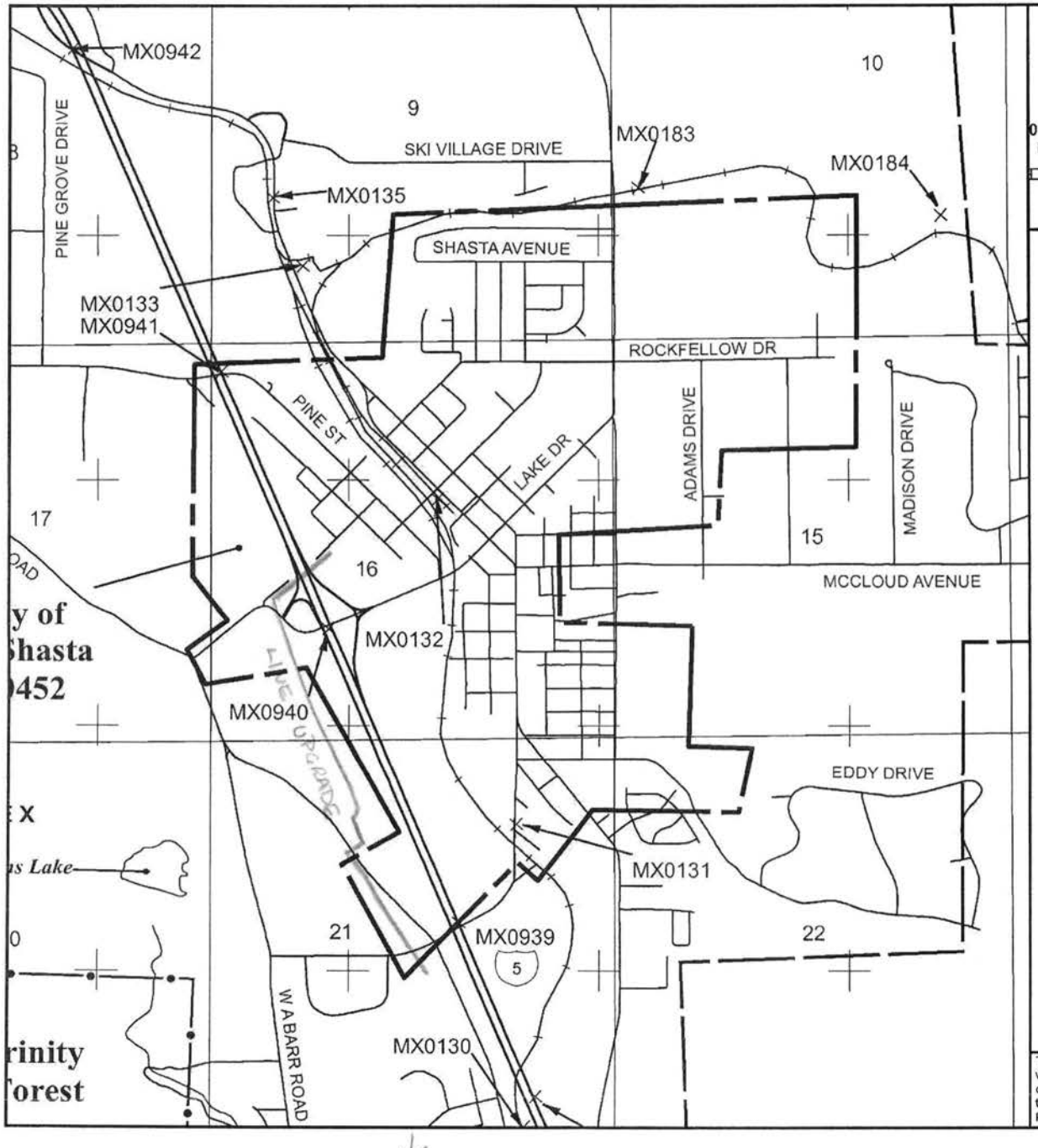
NEW PONDS LOCATIONS

Parker, Brian

From: Ted Marconi <TMarconi@ci.mt-shasta.ca.us>
Sent: Tuesday, March 12, 2013 4:27 PM
To: Brian A Parker
Subject: Mt. Shasta App-More Docs
Attachments: EDA FIRM & Zoning Maps.pdf; EDA Tribal Consult Lists.pdf

Here are the other maps and the tribal consult listing.

Ted Marconi
City Manager
City of Mt. Shasta
530) 926-7519
fax (530) 926-0339
marconi@ci.mt-shasta.ca.us



MAP SCALE 1" = 2000'

000 0 2000 4000 FEET

METER

NFIP

NATIONAL FLOOD INSURANCE PROGRAM

PANEL 3025D

FIRM

FLOOD INSURANCE RATE MAP

SISKIYOU COUNTY, CALIFORNIA
AND INCORPORATED AREAS

PANEL 3025 OF 3750

(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
DUNSMUIR, CITY OF	060363	3025	D
MT. SHASTA, CITY OF	060452	3025	D
SISKIYOU COUNTY	060362	3025	D

Notice to User: The **Map Number** shown below should be used when placing map orders; the **Community Number** shown above should be used on insurance applications for the subject community.

MAP NUMBER
06093C3025D

EFFECTIVE DATE
JANUARY 19, 2011

Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov

City of Mt. Shasta Wastewater Interceptor Line

Siskiyou County Planning Division
March 1, 2013

Karuk Tribe
Helene Rouvier, THPO
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Happy Camp, CA 96039
Tel: 530.493.1600 x 2202
Fax: 530.493.2564
Email: hrouvier@karuk.us

Pit River Tribe
Terry A. Del Bene, Ph.D., THPO
36970 Park Avenue
Burney, CA 96013
Tel: 530.335.5421 x 222
Email: terrydelbene@me.com and thpo@pitrivertribe.org

Smith River Rancheria
Ms. Suntayea Steinruck, THPO
140 Rowdy Creek Road
Smith River, CA 95567-9525
Tel: 707.487.9255 x 3180
Fax: 707.487.0930
Email: sunsteinruck@tolowa.com
Website: http://www.tolowa-nsn.gov

Susanville Indian Rancheria
Melany Johnson, THPO
745 Joaquin Street
Susanville, CA 96130
Tel: 530.251.5633
Fax: 530.251.5635
Email: nagpra1@citlink.net

Yurok-Table Bluff Tribe
Robert McConnell, THPO
HC Box 196, Hwy 96
Hoopa, CA 95546
Tel: 530.625.4130 x 1629
Fax: 530.625.4841
Email: rmcconnell@yuroktribe.nsn.us

OFFICE OF HISTORIC PRESERVATION
1725 23rd Street, Suite 100
Sacramento, CA 95816

PH: 916-445-7000
FAX: 916-445-7053
EMAIL: calshpo@parks.ca.gov

Native American Tribal Consultation List

County of Siskiyou
February 1, 2011

Pit River Tribe of California
Ida Riggins, Chairperson
36970 Park Ave
Burney , CA 96013
(530) 335-5421

Pit River
Achumawi - Atsugewi
Wintun

Winnemem Wintu Tribe
Caleen Sisk-Franco, Tribal Chair
14840 Bear Mountain Road
Redding , CA 96003
winnemem@hotmail.com
(530) 275-2737

Wintu

Karuk Tribe of California
Arch Super, Chairperson
P.O. Box 1016
Happy Camp, CA 96039
asuper@karuk.us
(800) 505-2785

Karuk / Karok

Modoc Tribe of Oklahoma
John Ballard, Environmental Director
515 G Street Southeast
Miami , OK 74354
modoc-oeg@cableone.net
(918) 542-1190

Modoc

Quartz Valley Indian Community
Harrold Bennett, Chairperson
13601 Quartz Valley Road
Fort Jones , CA 96032
tribalchair@qvir.com
(530) 468-5907

Karuk
Shasta
Upper Klamath

Shasta Nation
Roy V. Hall, Jr, Chairperson
P.O. Box 1054
Yreka , CA 96097
(530) 842-5654

Shasta

Wintu Tribe of Northern California
Kelli Hayward
PO Box 995
Shasta Lake, CA 96019
wintu_tribe@hotmail.com
(530) 245-0141
(530) 245-0241 - FAX

Wintu

Klamath Tribe
PO Box 436
Chiloquin 97624
, OR
taylor.david@klamathtribes.
(541) 783-2219

Klamath
Modoc

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Section 65352.3.

Parker, Brian

From: Ted Marconi <TMarconi@ci.mt-shasta.ca.us>
Sent: Tuesday, March 12, 2013 4:30 PM
To: Brian A Parker
Subject: Mt. Shasta App - Remaining Documents
Attachments: EDA Bio & Cult Assess Ltrs NSR.pdf; EDA ACOE App.pdf

Here are the Environmental Assessment reports, the USFWS consult application, and the Army Corps 404 application

Ted Marconi
City Manager
City of Mt. Shasta
530) 926-7519
fax (530) 926-0339
marconi@ci.mt-shasta.ca.us

North State Resources, Inc.

March 6, 2013

Keith McKinley
City Planner
City of Mount Shasta Planning Department
305 N. Mt. Shasta Boulevard
Mt. Shasta, CA 96067

Subject: EDA Grant Preparation Assistance for the Mount Shasta Sewer Replacement Project, City of Mount Shasta, Siskiyou County, California (NSR Project #28152)

Dear Mr. McKinley:

In support of the Economic Development Agency (EDA) grant application being prepared by the City, North State Resources, Inc. (NSR) conducted a preliminary biological review conducted within the Mount Shasta Sewer Replacement Project (Project) Area. The purpose of this letter is to provide information for the EDA Environmental Narrative that will be included with the grant application. This letter describes the plant communities present, the special-status plants and animals that may occur within those communities, and strategies for avoiding sensitive biological resources present in the project area. The project would include the replacement of an approximately 9,000 foot long segment of sewer pipeline and portions of the existing treatment plant facility. The project is located in Sections 16 and 21 of Township 40 North, Range 4 West of the *City of Mount Shasta, California* 7.5-minute topographic map.

Methods

On March 1, 2013, Julian Colescott (NSR biologist) drove the alignment with City of Mt. Shasta staff, stopping periodically to view the proposed alignment. Notes on vegetation communities and wetland types within the alignment were recorded. These field notes were then compared to the habitat requirements of special-status plant and wildlife species known to occur in the region to develop a preliminary list of special-status plants and wildlife that could occur within the alignment.

For the purpose of this evaluation, special-status plant species include plants that are (1) listed as threatened or endangered under California Endangered Species Act (CESA) or federal Endangered Species Act (ESA); (2) designated as rare by the California Department of Fish and Wildlife (CDFW); (3) state or federal candidate or proposed species for listing as threatened or endangered; and/or (4) have a California Rare Plant Rank (RPR) 1A, 1B, or 2.

Special-status wildlife include species that are (1) listed as threatened or endangered under the CESA or ESA; (2) proposed or petitioned for federal listing as threatened or endangered; and/or (3) state or federal candidates for listing as threatened or endangered. Other special-status wildlife species are identified by the CDFW as Species of Special Concern or California Fully Protected Species.

The California Natural Diversity Database (CNDDB) was reviewed for records of special-status plants and wildlife on the *Mt. Shasta City, California* USGS 7.5-minute quadrangle, and all adjacent quadrangles (California Department of Fish and Wildlife 2013). The CNDDB is a database consisting of historical observations of special-status plant species, wildlife species, and natural plant communities. Because the CNDDB is limited to reported sightings, it is not a comprehensive list of plant species that may occur in a particular area. However, it is useful in refining the list of special-status plant and wildlife species that have the potential to occur on the site. A list of the CNDDB occurrences for the 9-quadrangle area surrounding the project area is available upon request.

A database search was performed using the CNPS *Electronic Inventory*, which allows users to query the *Inventory of Rare and Endangered Plants of California* using a set of search criteria (e.g., county, habitat type, elevation). The search was performed using the *Mt. Shasta City, California* USGS 7.5-minute quadrangle and all adjacent quadrangles (California Native Plant Society 2013). The *Inventory of Rare and Endangered Plants of California* can produce a comprehensive list of plant species depending on search criteria that may occur in a particular area. It is a very useful tool in determining the list of special-status plant species that have the potential to occur on the site. The CNPS query results for the 9-quadrangle area surrounding the project area is available upon request.

The U.S. Fish and Wildlife Service (USFWS) maintains a database that lists federal endangered, threatened, and candidate species for each USGS quadrangle or county within the jurisdiction of the Sacramento Fish and Wildlife Office. The database was queried and all plant and animal species within the range of the study area were reviewed for this analysis (U.S. Fish and Wildlife Service 2012). The USFWS list is available upon request.

The following information sources were also referenced to determine special-status plant and animal species and/or other special habitats having the potential to occur in the study area.

- *Mt. Shasta City California* USGS 7.5 minute topographic quadrangle map;
- Aerial photography of the Project area and vicinity;
- Pertinent literatures including: The Jepson Manual, Vascular Plants of California (Baldwin et. al. 2012), the California's Wildlife series volumes I, II and III (Zeiner et al. 1988; Zeiner et al. 1990a; Zeiner et al. 1990b), Mt. Shasta General Plan Environmental Impact Statement (Biological Resources Section) (Pacific Municipal Consultants 2005), and other relevant literature.

Based on the results of the March 1, 2013 field visit and interpretation of the CNDDB, CNPS, and USFWS query results, preliminary lists of special-status plant species (Table 1 attached) and special-status wildlife (Table 2) with the potential to occur on the site were developed.

Results/Discussion

Land uses within the Project alignment include open space, rural residential, small farms, and urban (sewer plant, roads and highways). The Project alignment would traverse several different plant community types including wet meadow, pasture, and mixed chaparral. It also crosses Interstate Highway 5 and several other area streets. Dominant plants observed during the "drive by" survey and other descriptive information from each land use type include the following:

- Rural residential, small farms - The rural residential areas include widely spaced homes with large lots and scattered small farmsteads. The lots are landscaped or left in a natural form, and the small farms largely consist of open pastures with scattered outbuildings. Dominant plants observed include: black oak (*Quercus kelloggii*), Russian olive (*Elaeagnus angustifolia*), black locust (*Robina pseudoacacia*), ponderosa pine (*Pinus ponderosa*), willow (*Salix* sp.) shrub and tree forms, Himalayan blackberry (*Rubus armemiacus*), Scotchbroom (*Cytisus scoparius*), sweet pea (*Lathyrus latifolius*), and orchard grass (*Dactylis glomerata*).

- Open space - The large wetland area located near the northern end of the sewer pipe alignment, south of Hatchery Lane is a complex of wetlands with small streams, old ditches, and ponds, as well as pockets of fresh emergent wetland and seasonal wetlands. This wet meadow was originally set aside as a wetland mitigation area for the development of the Mt. Shasta Shopping Center. The dominant vegetation observed includes willow shrubs, cattail (*Typha latifolia*), common tule (*Schoenoplectus acutus*), wetland grasses [e.g., spreading bent grass (*Agrostis stolonifera*)], sedges (*Carex* sp.), and rushes [e.g., Baltic rush (*Juncus balticus*)].

- Urban - The wastewater treatment plant occurs in an area directly south of the Mt. Shasta Resort golf course, in an area dominated by greenleaf manzanita (*Arctostaphylos patula*), young ponderosa pine, incense cedar (*Calocedrus decurrens*), bitter cherry (*Prunus emarginata*), scattered willow shrubs, young black oak, and various upland herbaceous species. The existing treatment ponds support fringe wetland vegetation and a host of waterfowl (e.g., ducks and grebes). The site is approximately 0.1 mile from the Sacramento River canyon ("Box Canyon").

  Interstate Highway 5 is a four-lane freeway, with an on-ramp in the north-bound lanes, and an off-ramp on the south-bound lanes. Roadside ditches occur on both sides of the freeway and supported flowing water during the March 1, 2013 site visit. Wetland vegetation including willows, sedges and wetland grasses were observed in the ditch features.

Botanical. No state or federally listed plants species are likely to occur in the project area. The four special-status plant species with potential to occur on the Project area are CNPS RPR 1b and 2-ranked species. Species designated as RPR Lists 1B or 2 are not protected under the federal or state Endangered Species Acts, but they are commonly considered by lead agencies under the California Environmental Quality Act (CEQA) review process. The RPR plant species identified in Table 1 occur in wetland habitat types, and could be affected by the Project. Measures recommended to protect special-status plants include:

- Conduct a botanical survey of the wetland portions of the Project alignment to locate any special-status plants. If no plants occur, then additional measures will not be necessary. If special status plants are observed, their locations shall be mapped and avoided during project implementation. If complete avoidance is not possible, then the project proponent (City of Mt. Shasta) shall consult with the CDFW to determine appropriate conservation measures. Such measures may include collecting seeds for propagation and planting, or transplanting individual plants to safe, suitable areas in the immediate vicinity.

Wildlife. No federally listed wildlife species have the potential to occur within the Project area. One federal candidate for listing (Pacific fisher) has the potential to occur. Three state-listed species have potential to occur (willow flycatcher, greater sandhill crane and bald eagle). Several California species of special concern may occur within the Project area (foothill yellow-legged frog, Cascades frog, northwestern pond turtle, and yellow warbler).

Pacific fisher is a widely distributed mammal that occurs throughout the Sierra Nevada, Cascades and California Coast Ranges. Pacific fisher is a highly mobile species with a large home range. Fishers den in large trees, snags, logs, rock areas or slash piles, and they may occur in areas impacted by humans (e.g., small towns, farms) in search of food. They may traverse wetland areas, or utilize stream corridors as travel routes. The project area does not support typical denning features, but may be utilized by Pacific fishers during foraging. Recommendations provided below for birds would result in late summer/fall construction, which would correspond to the time when no immobile young are present. All juvenile and adult fishers would flee from the construction and would not likely be affected by the project.

Willow flycatcher, greater sandhill crane and bald eagle are state-listed birds that may be present in the vicinity of the project. Yellow warbler is a California species of special concern that may also nest in the area. Willow flycatchers and yellow warblers nest in willow shrubs in mosaic wetland/stream complexes. Greater sandhill cranes nest in large wetland areas, and bald eagles nest in large snags typically near large streams or lakes. Both the willow flycatcher and sandhill cranes may nest in the large wetland south of Hatchery Lane. Bald eagles may nest along the Box Canyon near the wastewater treatment plant. The following measures are recommended to protect nesting special-status birds:

- Construction shall occur outside of the typical nesting period of the bird species with potential to occur. The typical nesting period for these species in Siskiyou County is from March 1 to September 30. Construction outside of these dates would not affect the species. If construction must occur within the nesting period, then preconstruction surveys for the species shall be conducted. If nesting special-status birds are observed, then, in consultation with the CDFW, a buffer of 100 feet to one-quarter mile (depending on the species) shall be established around the nest to avoid impacting the species. The nests shall be monitored by a qualified biologist and once the young have fledged the protective buffer shall be eliminated and work within the area can proceed.

Foothill yellow-legged frog, Cascades frog, northwestern pond turtle may occur in the aquatic features (ponds, creeks and flowing ditches) within the project area. Unlike birds, there is no season within which construction could occur to eliminate the potential to affect these species. Adult frogs and turtles, and potentially turtle nests may still be present during the late summer/fall construction period. Therefore, the following measures are recommended to protect special-status amphibians and reptiles:

- Preconstruction surveys are recommended within two weeks of the start of construction in any aquatic areas that may be affected by the Project. If adult frogs, turtles, or turtle nests are observed, then the CDFW would be contacted to determine the best approach to minimize adverse affects to the species. Typical measures include allowing the turtle or frog to move from the impact area, or relocating a turtle nest.

Waters of the United States. Waters of the United States ("waters") are present in the Project area. Features observed include the large wet meadow complex (streams and wetlands), and roadside ditches. Prior to implementation of the project, all "waters" shall be mapped according to the U.S. Army Corps of Engineers (Corps) standards. The "wetland delineation" shall be submitted to the Corps for verification. Impacts to "waters" are likely due to the trenching required to construct the project. Prior to construction, the appropriate Clean Water Act Sections 401 and 404 permits shall be obtained authorizing the project. Adequate mitigation is required as a permit condition. Likely, the project would have to restore the temporary effects of the construction by recontouring the impacted area to pre-existing contours, replacing the top soil, and replanting the alignment with native wetland plant species.

Because the wetland south of Hatchery Lane was created as mitigation for a past development, the City of Mt. Shasta will also have to research whether the Corps, or any other regulatory agency, placed restrictions (e.g., deed restriction, conservation easement) upon the area as a condition of its use as a mitigation area.

If you have any questions about this report, please contact me by telephone at 530/926-3595 ext. 201, or by email at colescott@nsrnet.com.

Sincerely,
NORTH STATE RESOURCES, INC.

Julian Colescott
Project Manager

References

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U.S. Fish and Wildlife Service. 2012. List of Endangered and Threatened Species That May Occur in or be Affected by Projects in the Mt. Shasta City, California USGS Quadrangle. Available at http://www.fws.gov/sacramento/ES_Species/Lists/es_species_lists-form.cfm. Last updated on September 18, 2011. Accessed on February 27, 2013.

TABLE 1. PRELIMINARY REVIEW OF SPECIAL-STATUS PLANT SPECIES WITH POTENTIAL TO OCCUR IN THE MT. SHASTA SEWER PROJECT AREA

Species	Federal/State/CNPS RPR Status	Habitat Suitability
Epilobium oreganum Oregon fireweed	--/--/1B	Several historic (1914) records of the plant within 5 miles of the project area. The wetland area south of Hatchery Lane provides suitable habitat for this species. Prefers wet, gently sloping stream banks, meadows, and bogs from 500 to 7,800 feet in the Klamath Range. Blooms June-August (CNPS 2013).
Geum aleppicum Aleppo avens	--/--/2	Several records of the species within 5 miles. The wetland area south of Hatchery Lane provides suitable habitat for this species. Great Basin scrub, lower montane coniferous forest, meadows and seeps from 1,350-4,500 feet. Blooms June-August (CNPS 2013).
Ophioglossum pusillum Northern adder's tongue	--/--/2	One historic (1894) record of the species within 5 miles. The wetland area south of Hatchery Lane provides suitable habitat for this species. Marshes and swamp margins, valley foothill grassland at 3,000 to 6,000 feet. Blooms July (CNPS 2013).
Scutellaria galericulata Marsh skullcap	--/--/2	One historic (1894) record of the species within 5 miles. The wetland area south of Hatchery Lane provides suitable habitat for this species. Lower montane coniferous forests, meadows and seeps (mesic) and marshes and swamps from 0 to 6,000 feet. Blooms June–September (CNPS 2013).

NOTES:
FED = Federal
ST = State
Federal & State Codes:
E = Endangered; T = Threatened; R = Rare; SC = Species of Concern

CNPS = California Native Plant Society
CNPS RPR Codes:
List 1B = Rare, Threatened or Endangered in CA and Elsewhere;
List 2 = Rare, Threatened or Endangered in CA, but more common elsewhere;
List 3 = More information is needed – a review list

TABLE 2. PRELIMINARY REVIEW OF SPECIAL-STATUS WILDLIFE SPECIES WITH POTENTIAL TO OCCUR IN THE MT. SHASTA SEWER PROJECT AREA

Common Name/*Scientific Name*	Federal/State Status[a]	Habitat Suitability
Amphibians		
Rana boylii Foothill yellow-legged frog	--/CSC	Numerous CNDDB records of occurrence from the project vicinity. Stream features found within the project area are suitable to support this species. Frequents shallow, slow, gravelly streams and rivers with sunny banks in forests, chaparral, and woodlands from sea level to 6,700 ft.
Rana cascadae Cascades frog	--/CSC	Numerous CNDDB records of occurrence from the project vicinity. Stream features found within the project area are suitable to support this species. Requires montane aquatic habitats (lakes, ponds, small streams) in open coniferous forests at elevations between 750 and 7,500 feet (CDFG 1988).
Reptiles		
Clemmys marmorata marmorata Northwestern pond turtle	--/CSC	Only one CNDDB record from the project vicinity, but the species is known to occur within the project area. Ponds or other aquatic features within the wetland south of Hatchery Lane are suitable to support this species. Associated with permanent or nearly permanent water habitats such as wetlands, ponds, marshes, lakes, streams, irrigation ditches and vernal pools to 6,000 feet in elevation (CDFG 1988). Prefers aquatic habitats that usually have adequate vegetative cover. Breeding usually occurs in April and May.
Birds		
Dendroica petechia Yellow warbler	--/CSC	Willow and other shrubs within the project area are suitable to support this species. Occurs as a summer resident in northern California. Nests in dense riparian deciduous habitats with cottonwoods, willows, alders, and other small trees and shrubs.
Empidonax traillii Willow flycatcher	--/E	All occurrences within the project vicinity occur in the McCloud River drainage near the community of McCloud. However, the wetland habitat south of Hatchery Lane is suitable to support this species. Inhabits extensive thickets of low, dense willows in or near open water (CDFG 1990a). The nearest current records of nesting are along Pig Creek and Squaw Valley Creek south of McCloud (CNDDB 2013).
Grus canadensis tabida Greater sandhill crane	--/T, CA	Known to nest in wet meadows within the project vicinity, the large wetland feature south of Hatchery Lane is suitable to support this species. Nests and forages in open short grass plains and open wet meadow habitat. Known to breed in the Shasta Valley and Tule Lake regions of Siskiyou County.

TABLE 2. PRELIMINARY REVIEW OF SPECIAL-STATUS WILDLIFE SPECIES WITH POTENTIAL TO OCCUR IN THE MT. SHASTA SEWER PROJECT AREA

Common Name/*Scientific Name*	Federal/State Status[a]	Habitat Suitability
Haliaeetus leucocephalus Bald eagle	D/E, CA	Known nests occur along the Sacramento River and Lake Siskiyou but nesting habitat is absent from the project area. Nests and forages in proximity to lakes and large rivers. Preys on fish, waterfowl and other birds, small mammals, and carrion (CDFG 1990a). Commonly observed over Lake Siskiyou. .
Mammals		
Martes pennanti Pacific fisher	C/CSC	Many CNDDB records document presence of this species throughout the project vicinity. Forages in old-growth forests or mixed stands of old-growth and mature trees. May use riparian corridors for movement (CDFG, 1990b).

Definitions:

[a] C = Candidate D = Delisted E = Endangered T = Threatened CSC = California Species of Special Concern

North State Resources, Inc.

March 5, 2013

Keith McKinley
City Planner
City of Mount Shasta Planning Department
305 N. Mt. Shasta Boulevard
Mt. Shasta, CA 96067

SUBJECT: EDA Grant Preparation Assistance for the Mount Shasta Sewer Replacement Project, City of Mount Shasta, Siskiyou County, California (NSR Project #28152)

Dear Mr. McKinley -

In support of the Economic Development Agency (EDA) grant application being prepared by the City, North State Resources, Inc. (NSR) conducted a preliminary cultural resources review conducted for the Mount Shasta Sewer Replacement Project (Project). The purpose of this letter is to provide information for the EDA Environmental Narrative that will be included with the grant application. This letter summarizes the research efforts conducted by NSR to determine the potential for cultural resources to occur within the Project Area. In addition, this letter also provides strategies for avoiding resources present in the project area. The project would include the replacement of an approximately 9,000 foot long segment of sewer pipeline and portions of the existing treatment plant facility. The project is located in Sections 16 and 21 of Township 40 North, Range 4 West of the *City of Mount Shasta, California* 7.5-minute topographic map (Figure 1).

Results of Background Research

NSR conducted a records search (W13-31) at the Northeast Information Center (NEIC) on February 28, 2012. The search included the cultural resource records and survey reports as well the lists of resources on the National Register of Historic Places (NRHP), the California Historical Landmarks listing, the California Register of Historical Resources (CRHR), and the California Points of Historical Interest. Seven cultural resources surveys have been conducted within 0.25 miles the undertaking (Table 1). Four cultural resources have been recorded within 0.25 miles of the undertaking (Table 2). The resources documented in the search radius include one prehistoric site and four historic-era sites. No resources listed on the National Register or any of the California lists are located in or within 0.25 miles of the project. Although no surveys have been conducted within the Project area, and no cultural resources have been identified in the Project area, the previous surveys indicate that there is a moderate probability for cultural resources, both prehistoric and historic-era, to be present.

Table 1: Surveys Previously Conducted near the Project

Date	Author	Title	NEIC Study #
1980	Anthropological Resource Management	Archaeological Reconnaissance of the Proposed Shasta Holiday Development Siskiyou County, California	SI-L-10
1985	Manning, James	Archaeological Survey of the C.D.M.S., Inc. Site, City of Mount Shasta, Siskiyou County, California	SI-L-374
1992a	Elliot, Daniel	Archaeological Survey for the Proposed Dal Gallo Subdivision and Conversion Plan, Mount Shasta, Siskiyou County, California	3946a
1992b	Elliot, Daniel	Dal Gallo Timber Harvest Plan	3946b
1994	Berryman, Ron	Dal Gallo-Cheek Timber Harvest Plan	3946c
1998	Osterhoudt, Donald	Gemini Timber Harvest Plan	2884
2004	Jensen, Peter	Roseburg Infrastructure Improvement Project, Mt. Shasta, Siskiyou County, California	7167
2004	Dalu, Chris	Cultural Resources Inventory Survey for the Proposed Radio Antenna Relocation and Wetland Creation Project, City of Mount Shasta, Siskiyou County, California	5997
2006	SWCA Environmental Consultants	Cultural Resources Final Report of Monitoring and Finings for the Qwest Network Construction Project, State of California	7362

Table 2: Known Cultural Resource Sites near the Project

Site Number	Type	Distance from Project
CA-SIS-4095	Prehistoric	0.07 miles
CA-SIS-3889	Historic-Era	0.20 miles
CA-SIS-3888	Historic-Era	0.08 miles
CA-SIS-2558	Historic-Era	0.25 miles
CA-SIS-2446	Historic-Era	0.18 miles

Strategies for Avoiding Resources

Adverse effects, including the damage to or destruction of cultural resources can be avoided through a number of strategies. These can include conducting an archaeological survey, monitoring of known sites and potentially sensitive areas, and coordination with various agencies:

A cultural resources inventory including further archival research and a field survey is the best strategy for identifying and ultimately avoiding adverse effects on cultural resources. Knowledge of resource locations allows project designers the ability to avoid or minimize effects to cultural resources prior to construction. If a cultural resources inventory identifies areas of high probability for buried cultural resources or identifies potentially significant (per NRHP/CRHR criteria) resources, the presence of an archaeological monitor during construction/excavation activities is recommended. Monitoring allows the archaeologist to identify buried resources and provide appropriate avoidance and mitigation measures.

If previously unknown cultural resources are discovered during project activities, all work in the immediate vicinity of the discovery shall be stopped immediately and the contractor shall notify the City of Mount Shasta. An archaeologist meeting the Secretary of Interior's Professional Qualifications Standards shall be retained to evaluate the discovery and recommend appropriate conservation measures. The conservation measures will be implemented prior to re-initiation of ground-disturbing activities in the vicinity of the discovery.

If human remains are discovered during project activities, all activities in the vicinity of the find will be stopped and the Siskiyou County Sheriff-Coroner's Office shall be notified. If the coroner determines that the remains may be those of a Native American, the coroner will contact the Native American Heritage Commission (NAHC). Treatment of the remains shall be conducted in accordance with further direction of the County Coroner or the NAHC, as appropriate.

The information contained in this letter is sensitive regarding the nature and location of historic properties that should not be disclosed to the general public or unauthorized persons. Historic properties information is exempt from disclosure to the general public under the California Public Records Act Chapter 6254.10 and Section 304 of the National Historic Preservation Act. Please do not hesitate to contact me at (530) 345-4552, ext. 202, if you wish to discuss the results of the background research or NSR's recommended avoidance and mitigation measures.

Sincerely,

Kristina Crawford, M.A., RPA
Archaeologist

CITY OF MT. SHASTA

305 North Mt. Shasta Boulevard
Mt. Shasta, California 96067
(530) 926-7510 • Telephone
(530) 926-0339 • Fax

March 12, 2013

Erin Williams,
Field Supervisor
U.S. Fish and Wildlife Service
1829 S. Oregon Street
Yreka, CA 96097

U.S. Fish and Wildlife Service
Pacific Southwest Region 8
2800 Cottage Way #W2928
Sacramento, CA 95814

RE: Endangered Species Act Section 7 Consultation for proposed EDA grant assistance to construct Mt. Shasta Wastewater System Upgrade

Dear Ms,

The City of Mt. Shasta has made application for grant funding to the U.S. Department of Commerce, Economic Development Administration (EDA) to construct the Mt. Shasta Wastewater System Upgrade project. The EDA designates the City of MT. Shasta as EDA's non-federal representative for the purpose of consultation with the U.S. Fish and Wildlife Service (FWS) under 50 CFR Sec.402.08.

The project involves upgrade an existing 12" main sewer interceptor line to 18" to 30" sewer interceptor line, replacing approximately 6,000 to 7,000 feet of line and associated manholes, located in Sections 16 and 21 of Township 40N Range 4W in Siskiyou County, California. The project will take place within the existing 20' wide easements and right of way and will entail trenching and laying of new parallel pipe. The project will require boring and jacking under the Interstate 5 Freeway where an existing crossing already exists. The project will cross the alignment of Cold Creek and at least two delineated wetlands areas. The project area was previously disturbed in the 1970's when the current line was installed. One of the wetlands area is used as pasture land and one of the areas has been reclaimed and/or enhanced as a wetlands mitigation bank. The project also proposes to create two new ponds with earthen dikes and associated headworks facilities at the existing wastewater treatment facility located in Section 28 T40N R4W. The project will entail excavation and compaction of material to create the ponds and concrete work and associated piping for the headworks and connecting the ponds to the existing facility.

The project area is located in the above referenced sections at approximately between 41°18′N, 122°19′W and 41°17′N, 122°18'W for the interceptor line and at approximately 41°16′N, 122°19′W for the ponds. National Wetlands Inventory maps with the project location are attached.

No state or federally listed plants species are likely to occur in the project area. There are four special status plant species with potential to occur in the Project area which are California Native Plant Society (CNPS) RPR 1b and 2-ranked species. The following RPR plant species occur in wetland habitat types, and might be affected by the Project: *Epilobium oreganum*-Oregon fireweed; *Geum aleppicum* -Aleppo avens; *Ophioglossum pusillum*-Northern adder's tongue; and *Scutellaria galericulata*-Marsh skullcap.

No federally listed wildlife species have the potential to occur within the Project area. One federal candidate for listing, the Pacific fisher has the potential to occur. Three state-listed species have potential to occur: willow flycatcher, greater sandhill crane and bald eagle. California species of special concern which may occur within the Project area are foothill yellow-legged frog, Cascades frog, northwestern pond turtle, and yellow warbler.

There would be no permanent direct impacts from the project on any listed species or any candidate or special status species. The project area does not support typical denning features, but may be utilized by Pacific fishers during foraging. Recommendations for timing would result in late summer/fall construction and there should be no immobile young fishers or nesting birds at that time. If special status plants are identified during a pre-construction survey, their locations will be mapped and avoided or if unavoidable appropriate conservation measures will be implemented.

Based on the above information, a determination of "may affect, but is not likely to adversely affect" has been made for this project.

We respectfully ask for your concurrence on these findings and determination. If further information is required, please contact me at (530) 926-7510, or cityofms@nctv.com.

Thank you very much for your assistance with this project

Sincerely,

Theodore E. Marconi

Theodore E. Marconi,
City Manager
City of Mt. Shasta

encl

cc EDA Project Officer

U.S. ARMY CORPS OF ENGINEERS

APPLICATION FOR DEPARTMENT OF THE ARMY PERMIT

33 CFR 325. The proponent agency is CECW-CO-R.

OMB APPROVAL NO. 0710-0003
EXPIRES: 28 FEBRUARY 2013

Public reporting for this collection of information is estimated to average 11 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of the collection of information, including suggestions for reducing this burden, to Department of Defense, Washington Headquarters, Executive Services and Communications Directorate, Information Management Division and to the Office of Management and Budget, Paperwork Reduction Project (0710-0003). Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number. Please DO NOT RETURN your form to either of those addresses. Completed applications must be submitted to the District Engineer having jurisdiction over the location of the proposed activity.

PRIVACY ACT STATEMENT

Authorities: Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research, and Sanctuaries Act, Section 103, 33 USC 1413; Regulatory Programs of the Corps of Engineers; Final Rule 33 CFR 320-332. Principal Purpose: Information provided on this form will be used in evaluating the application for a permit. Routine Uses: This information may be shared with the Department of Justice and other federal, state, and local government agencies, and the public and may be made available as part of a public notice as required by Federal law. Submission of requested information is voluntary, however, if information is not provided the permit application cannot be evaluated nor can a permit be issued. One set of original drawings or good reproducible copies which show the location and character of the proposed activity must be attached to this application (see sample drawings and/or instructions) and be submitted to the District Engineer having jurisdiction over the location of the proposed activity. An application that is not completed in full will be returned.

(ITEMS 1 THRU 4 TO BE FILLED BY THE CORPS)

1. APPLICATION NO.	2. FIELD OFFICE CODE	3. DATE RECEIVED	4. DATE APPLICATION COMPLETE

(ITEMS BELOW TO BE FILLED BY APPLICANT)

5. APPLICANT'S NAME	8. AUTHORIZED AGENT'S NAME AND TITLE (agent is not required)
First - Middle - Last -	First - Theodore Middle - E. Last - Marconi
Company - City of Mt. Shasta	Company - City Manager, City of Mt. Shasta
E-mail Address - cityofms@nctv.com	E-mail Address - marconi@ci.mt-shasta.ca.us
6. APPLICANT'S ADDRESS:	**9. AGENT'S ADDRESS:**
Address- 305 N. Mt. Shasta Blvd.	Address- SAME
City - Mount Shasta State - CA Zip - 96067 Country - USA	City - State - Zip - Country -
7. APPLICANT'S PHONE NOs. w/AREA CODE	**10. AGENTS PHONE NOs. w/AREA CODE**
a. Residence b. Business c. Fax	a. Residence b. Business c. Fax
(530) 926-7510 (530) 926-0339	SAME

STATEMENT OF AUTHORIZATION

11. I hereby authorize, Theodore E. Marconi to act in my behalf as my agent in the processing of this application and to furnish, upon request, supplemental information in support of this permit application.

SIGNATURE OF APPLICANT DATE

NAME, LOCATION, AND DESCRIPTION OF PROJECT OR ACTIVITY

12. PROJECT NAME OR TITLE (see instructions)
Mt. Shasta Wastewater System Upgrade

13. NAME OF WATERBODY, IF KNOWN (if applicable)	14. PROJECT STREET ADDRESS (if applicable)
Cold Creek tributary to Sacramento River	Address N/A
15. LOCATION OF PROJECT	City - State- Zip-
Latitude: °N 41deg 18min Longitude: °W 122deg 19min	

16. OTHER LOCATION DESCRIPTIONS, IF KNOWN (see instructions)
State Tax Parcel ID Multiple Municipality City of Mt. Shasta
Section - 16, 21, and 28 Township - 40N Range - 4W

17. DIRECTIONS TO THE SITE

Interstate 5 to Central Mt. Shasta/Lake Street offramp. West on Hatchery Lane to beginning of line at Jessie Street.
Then continue west on Hatchery Lane to South Old Stage Road. South along South Old Stage Road which approximately parallels alignment.
For Wastewater Treatment Plant continue south on South Old Stage Road to Siskiyou Lake Boulevard. Right on Boulevard, Left on Christian Way, Right on Grant Road approximately 1 mile to Plant.

18. Nature of Activity (Description of project, include all features)

Trench and recover to install 18 to 30 inch diameter wastewater sewer pipe in 20 foot easement parallel to existing 12 inch diameter pipe. Abandon in place existing pipe. Pipeline alignment will cross Cold Creek and associated wetlands. Pipeline also crosses Interstate 5, South Old Stage Road, and Ream Avenue right of ways.
Excavate and build two approximately 4 million gallon earthen dike wastewater lagoons at existing treatment plant and associated headworks and piping facilities.

19. Project Purpose (Describe the reason or purpose of the project, see instructions)

Project is necessary to upgrade existing sewer transmission lines to accommodate future growth and the reopening of a water bottling facility.

USE BLOCKS 20-23 IF DREDGED AND/OR FILL MATERIAL IS TO BE DISCHARGED

20. Reason(s) for Discharge

Spoils will be created and need to be removed to avoid elevating the terrain in the wetlands and roadways. There will be no permanent discharge of materials in the wetlands. The same excavated native soils will be used as backfill except for sand backfill to protect the pipe and the volume displaced by pipe installation. All excess material will be removed from the wetlands areas.

21. Type(s) of Material Being Discharged and the Amount of Each Type in Cubic Yards:

Type Amount in Cubic Yards	Type Amount in Cubic Yards	Type Amount in Cubic Yards
Excavation spoils - 2000 cy		

22. Surface Area in Acres of Wetlands or Other Waters Filled (see instructions)

Acres

or

Linear Feet Approximately 4000 feet of trench bedding and backfill. No net increase in filled uplands will remain on project completion.

23. Description of Avoidance, Minimization, and Compensation (see instructions)

Wetlands area topsoils will be retained and replaced, trench cutoffs will be installed at the wetlands limits, and baffles will be placed in bedding materials to prevent new channelization, and vegetation will be replanted to restore wetlands areas to original conditions.

24. Is Any Portion of the Work Already Complete? ☐ Yes ☒ No IF YES, DESCRIBE THE COMPLETED WORK

25. Addresses of Adjoining Property Owners, Lessees, Etc., Whose Property Adjoins the Waterbody (if more than can be entered here, please attach a supplemental list).

a. Address- Douglas Merrill, P.O. Box 219, S Old Stage Road

City - Mount Shasta State - CA Zip - 96067

b. Address- James Nile, 825 W. Ream Avenue

City - Mount Shasta State - CA Zip - 96067

c. Address- Mount Shasta Resort, 1000 Siskiyou Lake Blvd.

City - Mount Shasta State - CA Zip - 96067

d. Address- Pacific Power, P.O. Box 400, S Old Stage Road

City - Portland State - OR Zip - 97207

e. Address-

City - State - Zip -

26. List of Other Certificates or Approvals/Denials received from other Federal, State, or Local Agencies for Work Described in This Application.

AGENCY	TYPE APPROVAL*	IDENTIFICATION NUMBER	DATE APPLIED	DATE APPROVED	DATE DENIED
Siskiyou County	Encroachment	Pending			
CalTrans	Encroachment	Pending			

* Would include but is not restricted to zoning, building, and flood plain permits

27. Application is hereby made for permit or permits to authorize the work described in this application. I certify that this information in this application is complete and accurate. I further certify that I possess the authority to undertake the work described herein or am acting as the duly authorized agent of the applicant.

Theodore E Marcum

SIGNATURE OF APPLICANT DATE SIGNATURE OF AGENT DATE

The Application must be signed by the person who desires to undertake the proposed activity (applicant) or it may be signed by a duly authorized agent if the statement in block 11 has been filled out and signed.

18 U.S.C. Section 1001 provides that: Whoever, in any manner within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals, or covers up any trick, scheme, or disguises a material fact or makes any false, fictitious or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statements or entry, shall be fined not more than $10,000 or imprisoned not more than five years or both.

Parker, Brian

From: Ted Marconi <TMarconi@ci.mt-shasta.ca.us>
Sent: Tuesday, March 19, 2013 2:30 PM
To: Mary S Fitzgerald
Cc: Brian A Parker
Subject: Mt. Shasta Application
Attachments: EDA Bio & Cult Assess Ltrs NSR.pdf

Ms. Fitzgerald,

Here are the consult letters from our natural resources folks. If you send me the SHPO template I will get that letter ready to go, but hold on to it until I hear from you.

I gave you all of the tribal contacts associated with the area; but I think the main ones are the Winnemem Wintu, the Pit River Tribe, and the Shasta Nation, with the Karuk, the Modoc, and the Klamath as secondary.

Again I apologize for our people getting the politicians involved.

Ted Marconi
City Manager
City of Mt. Shasta
530) 926-7519
fax (530) 926-0339
marconi@ci.mt-shasta.ca.us

North State Resources, Inc.

March 6, 2013

Keith McKinley
City Planner
City of Mount Shasta Planning Department
305 N. Mt. Shasta Boulevard
Mt. Shasta, CA 96067

Subject: EDA Grant Preparation Assistance for the Mount Shasta Sewer Replacement Project, City of Mount Shasta, Siskiyou County, California (NSR Project #28152)

Dear Mr. McKinley:

In support of the Economic Development Agency (EDA) grant application being prepared by the City, North State Resources, Inc. (NSR) conducted a preliminary biological review conducted within the Mount Shasta Sewer Replacement Project (Project) Area. The purpose of this letter is to provide information for the EDA Environmental Narrative that will be included with the grant application. This letter describes the plant communities present, the special-status plants and animals that may occur within those communities, and strategies for avoiding sensitive biological resources present in the project area. The project would include the replacement of an approximately 9,000 foot long segment of sewer pipeline and portions of the existing treatment plant facility. The project is located in Sections 16 and 21 of Township 40 North, Range 4 West of the *City of Mount Shasta, California* 7.5-minute topographic map.

Methods

On March 1, 2013, Julian Colescott (NSR biologist) drove the alignment with City of Mt. Shasta staff, stopping periodically to view the proposed alignment. Notes on vegetation communities and wetland types within the alignment were recorded. These field notes were then compared to the habitat requirements of special-status plant and wildlife species known to occur in the region to develop a preliminary list of special-status plants and wildlife that could occur within the alignment.

For the purpose of this evaluation, special-status plant species include plants that are (1) listed as threatened or endangered under California Endangered Species Act (CESA) or federal Endangered Species Act (ESA); (2) designated as rare by the California Department of Fish and Wildlife (CDFW); (3) state or federal candidate or proposed species for listing as threatened or endangered; and/or (4) have a California Rare Plant Rank (RPR) 1A, 1B, or 2.

Special-status wildlife include species that are (1) listed as threatened or endangered under the CESA or ESA; (2) proposed or petitioned for federal listing as threatened or endangered; and/or (3) state or federal candidates for listing as threatened or endangered. Other special-status wildlife species are identified by the CDFW as Species of Special Concern or California Fully Protected Species.

The California Natural Diversity Database (CNDDB) was reviewed for records of special-status plants and wildlife on the *Mt. Shasta City, California* USGS 7.5-minute quadrangle, and all adjacent quadrangles (California Department of Fish and Wildlife 2013). The CNDDB is a database consisting of historical observations of special-status plant species, wildlife species, and natural plant communities. Because the CNDDB is limited to reported sightings, it is not a comprehensive list of plant species that may occur in a particular area. However, it is useful in refining the list of special-status plant and wildlife species that have the potential to occur on the site. A list of the CNDDB occurrences for the 9-quadrangle area surrounding the project area is available upon request.

A database search was performed using the CNPS *Electronic Inventory*, which allows users to query the *Inventory of Rare and Endangered Plants of California* using a set of search criteria (e.g., county, habitat type, elevation). The search was performed using the *Mt. Shasta City, California* USGS 7.5-minute quadrangle and all adjacent quadrangles (California Native Plant Society 2013). The *Inventory of Rare and Endangered Plants of California* can produce a comprehensive list of plant species depending on search criteria that may occur in a particular area. It is a very useful tool in determining the list of special-status plant species that have the potential to occur on the site. The CNPS query results for the 9-quadrangle area surrounding the project area is available upon request.

The U.S. Fish and Wildlife Service (USFWS) maintains a database that lists federal endangered, threatened, and candidate species for each USGS quadrangle or county within the jurisdiction of the Sacramento Fish and Wildlife Office. The database was queried and all plant and animal species within the range of the study area were reviewed for this analysis (U.S. Fish and Wildlife Service 2012). The USFWS list is available upon request.

The following information sources were also referenced to determine special-status plant and animal species and/or other special habitats having the potential to occur in the study area.

- *Mt. Shasta City California* USGS 7.5 minute topographic quadrangle map;
- Aerial photography of the Project area and vicinity;
- Pertinent literatures including: The Jepson Manual, Vascular Plants of California (Baldwin et. al. 2012), the California's Wildlife series volumes I, II and III (Zeiner et al. 1988; Zeiner et al. 1990a; Zeiner et al. 1990b), Mt. Shasta General Plan Environmental Impact Statement (Biological Resources Section) (Pacific Municipal Consultants 2005), and other relevant literature.

Based on the results of the March 1, 2013 field visit and interpretation of the CNDDB, CNPS, and USFWS query results, preliminary lists of special-status plant species (Table 1 attached) and special-status wildlife (Table 2) with the potential to occur on the site were developed.

Results/Discussion

Land uses within the Project alignment include open space, rural residential, small farms, and urban (sewer plant, roads and highways). The Project alignment would traverse several different plant community types including wet meadow, pasture, and mixed chaparral. It also crosses Interstate Highway 5 and several other area streets. Dominant plants observed during the "drive by" survey and other descriptive information from each land use type include the following:

- Rural residential, small farms - The rural residential areas include widely spaced homes with large lots and scattered small farmsteads. The lots are landscaped or left in a natural form, and the small farms largely consist of open pastures with scattered outbuildings. Dominant plants observed include: black oak (*Quercus kelloggii*), Russian olive (*Elaeagnus angustifolia*), black locust (*Robina pseudoacacia*), ponderosa pine (*Pinus ponderosa*), willow (*Salix* sp.) shrub and tree forms, Himalayan blackberry (*Rubus armemiacus*), Scotchbroom (*Cytisus scoparius*), sweet pea (*Lathyrus latifolius*), and orchard grass (*Dactylis glomerata*).

- Open space - The large wetland area located near the northern end of the sewer pipe alignment, south of Hatchery Lane is a complex of wetlands with small streams, old ditches, and ponds, as well as pockets of fresh emergent wetland and seasonal wetlands. This wet meadow was originally set aside as a wetland mitigation area for the development of the Mt. Shasta Shopping Center. The dominant vegetation observed includes willow shrubs, cattail (*Typha latifolia*), common tule (*Schoenoplectus acutus*), wetland grasses [e.g., spreading bent grass (*Agrostis stolonifera*)], sedges (*Carex* sp.), and rushes [e.g., Baltic rush (*Juncus balticus*)].

- Urban - The wastewater treatment plant occurs in an area directly south of the Mt. Shasta Resort golf course, in an area dominated by greenleaf manzanita (*Arctostaphylos patula*), young ponderosa pine, incense cedar (*Calocedrus decurrens*), bitter cherry (*Prunus emarginata*), scattered willow shrubs, young black oak, and various upland herbaceous species. The existing treatment ponds support fringe wetland vegetation and a host of waterfowl (e.g., ducks and grebes). The site is approximately 0.1 mile from the Sacramento River canyon ("Box Canyon").

  Interstate Highway 5 is a four-lane freeway, with an on-ramp in the north-bound lanes, and an off-ramp on the south-bound lanes. Roadside ditches occur on both sides of the freeway and supported flowing water during the March 1, 2013 site visit. Wetland vegetation including willows, sedges and wetland grasses were observed in the ditch features.

Botanical. No state or federally listed plants species are likely to occur in the project area. The four special-status plant species with potential to occur on the Project area are CNPS RPR 1b and 2-ranked species. Species designated as RPR Lists 1B or 2 are not protected under the federal or state Endangered Species Acts, but they are commonly considered by lead agencies under the California Environmental Quality Act (CEQA) review process. The RPR plant species identified in Table 1 occur in wetland habitat types, and could be affected by the Project. Measures recommended to protect special-status plants include:

- Conduct a botanical survey of the wetland portions of the Project alignment to locate any special-status plants. If no plants occur, then additional measures will not be necessary. If special status plants are observed, their locations shall be mapped and avoided during project implementation. If complete avoidance is not possible, then the project proponent (City of Mt. Shasta) shall consult with the CDFW to determine appropriate conservation measures. Such measures may include collecting seeds for propagation and planting, or transplanting individual plants to safe, suitable areas in the immediate vicinity.

Wildlife. No federally listed wildlife species have the potential to occur within the Project area. One federal candidate for listing (Pacific fisher) has the potential to occur. Three state-listed species have potential to occur (willow flycatcher, greater sandhill crane and bald eagle). Several California species of special concern may occur within the Project area (foothill yellow-legged frog, Cascades frog, northwestern pond turtle, and yellow warbler).

Pacific fisher is a widely distributed mammal that occurs throughout the Sierra Nevada, Cascades and California Coast Ranges. Pacific fisher is a highly mobile species with a large home range. Fishers den in large trees, snags, logs, rock areas or slash piles, and they may occur in areas impacted by humans (e.g., small towns, farms) in search of food. They may traverse wetland areas, or utilize stream corridors as travel routes. The project area does not support typical denning features, but may be utilized by Pacific fishers during foraging. Recommendations provided below for birds would result in late summer/fall construction, which would correspond to the time when no immobile young are present. All juvenile and adult fishers would flee from the construction and would not likely be affected by the project.

Willow flycatcher, greater sandhill crane and bald eagle are state-listed birds that may be present in the vicinity of the project. Yellow warbler is a California species of special concern that may also nest in the area. Willow flycatchers and yellow warblers nest in willow shrubs in mosaic wetland/stream complexes. Greater sandhill cranes nest in large wetland areas, and bald eagles nest in large snags typically near large streams or lakes. Both the willow flycatcher and sandhill cranes may nest in the large wetland south of Hatchery Lane. Bald eagles may nest along the Box Canyon near the wastewater treatment plant. The following measures are recommended to protect nesting special-status birds:

- Construction shall occur outside of the typical nesting period of the bird species with potential to occur. The typical nesting period for these species in Siskiyou County is from March 1 to September 30. Construction outside of these dates would not affect the species. If construction must occur within the nesting period, then preconstruction surveys for the species shall be conducted. If nesting special-status birds are observed, then, in consultation with the CDFW, a buffer of 100 feet to one-quarter mile (depending on the species) shall be established around the nest to avoid impacting the species. The nests shall be monitored by a qualified biologist and once the young have fledged the protective buffer shall be eliminated and work within the area can proceed.

Foothill yellow-legged frog, Cascades frog, northwestern pond turtle may occur in the aquatic features (ponds, creeks and flowing ditches) within the project area. Unlike birds, there is no season within which construction could occur to eliminate the potential to affect these species. Adult frogs and turtles, and potentially turtle nests may still be present during the late summer/fall construction period. Therefore, the following measures are recommended to protect special-status amphibians and reptiles:

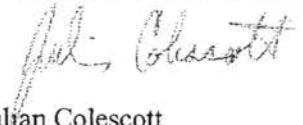
- Preconstruction surveys are recommended within two weeks of the start of construction in any aquatic areas that may be affected by the Project. If adult frogs, turtles, or turtle nests are observed, then the CDFW would be contacted to determine the best approach to minimize adverse affects to the species. Typical measures include allowing the turtle or frog to move from the impact area, or relocating a turtle nest.

Waters of the United States. Waters of the United States ("waters") are present in the Project area. Features observed include the large wet meadow complex (streams and wetlands), and roadside ditches. Prior to implementation of the project, all "waters" shall be mapped according to the U.S. Army Corps of Engineers (Corps) standards. The "wetland delineation" shall be submitted to the Corps for verification. Impacts to "waters" are likely due to the trenching required to construct the project. Prior to construction, the appropriate Clean Water Act Sections 401 and 404 permits shall be obtained authorizing the project. Adequate mitigation is required as a permit condition. Likely, the project would have to restore the temporary effects of the construction by recontouring the impacted area to pre-existing contours, replacing the top soil, and replanting the alignment with native wetland plant species.

Because the wetland south of Hatchery Lane was created as mitigation for a past development, the City of Mt. Shasta will also have to research whether the Corps, or any other regulatory agency, placed restrictions (e.g., deed restriction, conservation easement) upon the area as a condition of its use as a mitigation area.

If you have any questions about this report, please contact me by telephone at 530/926-3595 ext. 201, or by email at colescott@nsrnet.com.

Sincerely,
NORTH STATE RESOURCES, INC.



Julian Colescott
Project Manager

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TABLE 1. PRELIMINARY REVIEW OF SPECIAL-STATUS PLANT SPECIES WITH POTENTIAL TO OCCUR IN THE MT. SHASTA SEWER PROJECT AREA

Species	Federal/State/CNPS RPR Status	Habitat Suitability
Epilobium oreganum Oregon fireweed	--/--/1B	Several historic (1914) records of the plant within 5 miles of the project area. The wetland area south of Hatchery Lane provides suitable habitat for this species. Prefers wet, gently sloping stream banks, meadows, and bogs from 500 to 7,800 feet in the Klamath Range. Blooms June-August (CNPS 2013).
Geum aleppicum Aleppo avens	--/--/2	Several records of the species within 5 miles. The wetland area south of Hatchery Lane provides suitable habitat for this species. Great Basin scrub, lower montane coniferous forest, meadows and seeps from 1,350-4,500 feet. Blooms June-August (CNPS 2013).
Ophioglossum pusillum Northern adder's tongue	--/--/2	One historic (1894) record of the species within 5 miles. The wetland area south of Hatchery Lane provides suitable habitat for this species. Marshes and swamp margins, valley foothill grassland at 3,000 to 6,000 feet. Blooms July (CNPS 2013).
Scutellaria galericulata Marsh skullcap	--/--/2	One historic (1894) record of the species within 5 miles. The wetland area south of Hatchery Lane provides suitable habitat for this species. Lower montane coniferous forests, meadows and seeps (mesic) and marshes and swamps from 0 to 6,000 feet. Blooms June–September (CNPS 2013).

NOTES:
FED = Federal
ST = State
Federal & State Codes:
E = Endangered; T = Threatened; R = Rare; SC = Species of Concern

CNPS = California Native Plant Society
CNPS RPR Codes:
List 1B = Rare, Threatened or Endangered in CA and Elsewhere;
List 2 = Rare, Threatened or Endangered in CA, but more common elsewhere;
List 3 = More information is needed – a review list

TABLE 2. PRELIMINARY REVIEW OF SPECIAL-STATUS WILDLIFE SPECIES WITH POTENTIAL TO OCCUR IN THE MT. SHASTA SEWER PROJECT AREA

Common Name/*Scientific Name*	Federal/State Status[a]	Habitat Suitability
Amphibians		
Rana boylii Foothill yellow-legged frog	--/CSC	Numerous CNDDB records of occurrence from the project vicinity. Stream features found within the project area are suitable to support this species. Frequents shallow, slow, gravelly streams and rivers with sunny banks in forests, chaparral, and woodlands from sea level to 6,700 ft.
Rana cascadae Cascades frog	--/CSC	Numerous CNDDB records of occurrence from the project vicinity. Stream features found within the project area are suitable to support this species. Requires montane aquatic habitats (lakes, ponds, small streams) in open coniferous forests at elevations between 750 and 7,500 feet (CDFG 1988).
Reptiles		
Clemmys marmorata marmorata Northwestern pond turtle	--/CSC	Only one CNDDB record from the project vicinity, but the species is known to occur within the project area. Ponds or other aquatic features within the wetland south of Hatchery Lane are suitable to support this species. Associated with permanent or nearly permanent water habitats such as wetlands, ponds, marshes, lakes, streams, irrigation ditches and vernal pools to 6,000 feet in elevation (CDFG 1988). Prefers aquatic habitats that usually have adequate vegetative cover. Breeding usually occurs in April and May.
Birds		
Dendroica petechia Yellow warbler	--/CSC	Willow and other shrubs within the project area are suitable to support this species. Occurs as a summer resident in northern California. Nests in dense riparian deciduous habitats with cottonwoods, willows, alders, and other small trees and shrubs.
Empidonax traillii Willow flycatcher	--/E	All occurrences within the project vicinity occur in the McCloud River drainage near the community of McCloud. However, the wetland habitat south of Hatchery Lane is suitable to support this species. Inhabits extensive thickets of low, dense willows in or near open water (CDFG 1990a). The nearest current records of nesting are along Pig Creek and Squaw Valley Creek south of McCloud (CNDDB 2013).
Grus canadensis tabida Greater sandhill crane	--/T, CA	Known to nest in wet meadows within the project vicinity, the large wetland feature south of Hatchery Lane is suitable to support this species. Nests and forages in open short grass plains and open wet meadow habitat. Known to breed in the Shasta Valley and Tule Lake regions of Siskiyou County.

TABLE 2. PRELIMINARY REVIEW OF SPECIAL-STATUS WILDLIFE SPECIES WITH POTENTIAL TO OCCUR IN THE MT. SHASTA SEWER PROJECT AREA

Common Name/*Scientific Name*	Federal/State Status[a]	Habitat Suitability
Haliaeetus leucocephalus Bald eagle	D/E, CA	Known nests occur along the Sacramento River and Lake Siskiyou but nesting habitat is absent from the project area. Nests and forages in proximity to lakes and large rivers. Preys on fish, waterfowl and other birds, small mammals, and carrion (CDFG 1990a). Commonly observed over Lake Siskiyou. .
Mammals		
Martes pennanti Pacific fisher	C/CSC	Many CNDDB records document presence of this species throughout the project vicinity. Forages in old-growth forests or mixed stands of old-growth and mature trees. May use riparian corridors for movement (CDFG, 1990b).

Definitions:

[a] C = Candidate D = Delisted E = Endangered T = Threatened CSC = California Species of Special Concern

North State Resources, Inc.

March 5, 2013

Keith McKinley
City Planner
City of Mount Shasta Planning Department
305 N. Mt. Shasta Boulevard
Mt. Shasta, CA 96067

SUBJECT: EDA Grant Preparation Assistance for the Mount Shasta Sewer Replacement Project, City of Mount Shasta, Siskiyou County, California (NSR Project #28152)

Dear Mr. McKinley -

In support of the Economic Development Agency (EDA) grant application being prepared by the City, North State Resources, Inc. (NSR) conducted a preliminary cultural resources review conducted for the Mount Shasta Sewer Replacement Project (Project). The purpose of this letter is to provide information for the EDA Environmental Narrative that will be included with the grant application. This letter summarizes the research efforts conducted by NSR to determine the potential for cultural resources to occur within the Project Area. In addition, this letter also provides strategies for avoiding resources present in the project area. The project would include the replacement of an approximately 9,000 foot long segment of sewer pipeline and portions of the existing treatment plant facility. The project is located in Sections 16 and 21 of Township 40 North, Range 4 West of the *City of Mount Shasta, California* 7.5-minute topographic map (Figure 1).

Results of Background Research

NSR conducted a records search (W13-31) at the Northeast Information Center (NEIC) on February 28, 2012. The search included the cultural resource records and survey reports as well the lists of resources on the National Register of Historic Places (NRHP), the California Historical Landmarks listing, the California Register of Historical Resources (CRHR), and the California Points of Historical Interest. Seven cultural resources surveys have been conducted within 0.25 miles the undertaking (Table 1). Four cultural resources have been recorded within 0.25 miles of the undertaking (Table 2). The resources documented in the search radius include one prehistoric site and four historic-era sites. No resources listed on the National Register or any of the California lists are located in or within 0.25 miles of the project. Although no surveys have been conducted within the Project area, and no cultural resources have been identified in the Project area, the previous surveys indicate that there is a moderate probability for cultural resources, both prehistoric and historic-era, to be present.

Table 1: Surveys Previously Conducted near the Project

Date	Author	Title	NEIC Study #
1980	Anthropological Resource Management	Archaeological Reconnaissance of the Proposed Shasta Holiday Development Siskiyou County, California	SI-L-10
1985	Manning, James	Archaeological Survey of the C.D.M.S., Inc. Site, City of Mount Shasta, Siskiyou County, California	SI-L-374
1992a	Elliot, Daniel	Archaeological Survey for the Proposed Dal Gallo Subdivision and Conversion Plan, Mount Shasta, Siskiyou County, California	3946a
1992b	Elliot, Daniel	Dal Gallo Timber Harvest Plan	3946b
1994	Berryman, Ron	Dal Gallo-Cheek Timber Harvest Plan	3946c
1998	Osterhoudt, Donald	Gemini Timber Harvest Plan	2884
2004	Jensen, Peter	Roseburg Infrastructure Improvement Project, Mt. Shasta, Siskiyou County, California	7167
2004	Dalu, Chris	Cultural Resources Inventory Survey for the Proposed Radio Antenna Relocation and Wetland Creation Project, City of Mount Shasta, Siskiyou County, California	5997
2006	SWCA Environmental Consultants	Cultural Resources Final Report of Monitoring and Finings for the Qwest Network Construction Project, State of California	7362

Table 2: Known Cultural Resource Sites near the Project

Site Number	Type	Distance from Project
CA-SIS-4095	Prehistoric	0.07 miles
CA-SIS-3889	Historic-Era	0.20 miles
CA-SIS-3888	Historic-Era	0.08 miles
CA-SIS-2558	Historic-Era	0.25 miles
CA-SIS-2446	Historic-Era	0.18 miles

Strategies for Avoiding Resources

Adverse effects, including the damage to or destruction of cultural resources can be avoided through a number of strategies. These can include conducting an archaeological survey, monitoring of known sites and potentially sensitive areas, and coordination with various agencies:

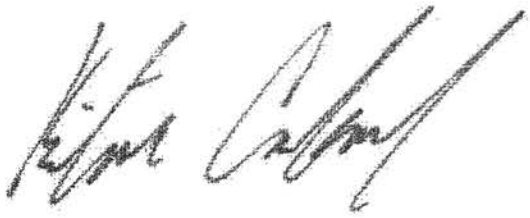
A cultural resources inventory including further archival research and a field survey is the best strategy for identifying and ultimately avoiding adverse effects on cultural resources. Knowledge of resource locations allows project designers the ability to avoid or minimize effects to cultural resources prior to construction. If a cultural resources inventory identifies areas of high probability for buried cultural resources or identifies potentially significant (per NRHP/CRHR criteria) resources, the presence of an archaeological monitor during construction/excavation activities is recommended. Monitoring allows the archaeologist to identify buried resources and provide appropriate avoidance and mitigation measures.

If previously unknown cultural resources are discovered during project activities, all work in the immediate vicinity of the discovery shall be stopped immediately and the contractor shall notify the City of Mount Shasta. An archaeologist meeting the Secretary of Interior's Professional Qualifications Standards shall be retained to evaluate the discovery and recommend appropriate conservation measures. The conservation measures will be implemented prior to re-initiation of ground-disturbing activities in the vicinity of the discovery.

If human remains are discovered during project activities, all activities in the vicinity of the find will be stopped and the Siskiyou County Sheriff-Coroner's Office shall be notified. If the coroner determines that the remains may be those of a Native American, the coroner will contact the Native American Heritage Commission (NAHC). Treatment of the remains shall be conducted in accordance with further direction of the County Coroner or the NAHC, as appropriate.

The information contained in this letter is sensitive regarding the nature and location of historic properties that should not be disclosed to the general public or unauthorized persons. Historic properties information is exempt from disclosure to the general public under the California Public Records Act Chapter 6254.10 and Section 304 of the National Historic Preservation Act. Please do not hesitate to contact me at (530) 345-4552, ext. 202, if you wish to discuss the results of the background research or NSR's recommended avoidance and mitigation measures.

Sincerely,



Kristina Crawford, M.A., RPA
Archaeologist

CITY OF MT. SHASTA

305 North Mt. Shasta Boulevard
Mt. Shasta, California 96067
(530) 926-7510 • Telephone
(530) 926-0339 • Fax

March 12, 2013

Erin Williams,
Field Supervisor
U.S. Fish and Wildlife Service
1829 S. Oregon Street
Yreka, CA 96097

U.S. Fish and Wildlife Service
Pacific Southwest Region 8
2800 Cottage Way #W2928
Sacramento, CA 95814

RE: Endangered Species Act Section 7 Consultation for proposed EDA grant assistance to construct Mt. Shasta Wastewater System Upgrade

Dear Ms,

The City of Mt. Shasta has made application for grant funding to the U.S. Department of Commerce, Economic Development Administration (EDA) to construct the Mt. Shasta Wastewater System Upgrade project. The EDA designates the City of MT. Shasta as EDA's non-federal representative for the purpose of consultation with the U.S. Fish and Wildlife Service (FWS) under 50 CFR Sec.402.08.

The project involves upgrade an existing 12" main sewer interceptor line to 18" to 30" sewer interceptor line, replacing approximately 6,000 to 7,000 feet of line and associated manholes, located in Sections 16 and 21 of Township 40N Range 4W in Siskiyou County, California. The project will take place within the existing 20' wide easements and right of way and will entail trenching and laying of new parallel pipe. The project will require boring and jacking under the Interstate 5 Freeway where an existing crossing already exists. The project will cross the alignment of Cold Creek and at least two delineated wetlands areas. The project area was previously disturbed in the 1970's when the current line was installed. One of the wetlands area is used as pasture land and one of the areas has been reclaimed and/or enhanced as a wetlands mitigation bank. The project also proposes to create two new ponds with earthen dikes and associated headworks facilities at the existing wastewater treatment facility located in Section 28 T40N R4W. The project will entail excavation and compaction of material to create the ponds and concrete work and associated piping for the headworks and connecting the ponds to the existing facility.

The project area is located in the above referenced sections at approximately between 41°18′N, 122°19′W and 41°17′N, 122°18'W for the interceptor line and at approximately 41°16′N, 122°19′W for the ponds. National Wetlands Inventory maps with the project location are attached.

No state or federally listed plants species are likely to occur in the project area. There are four special status plant species with potential to occur in the Project area which are California Native Plant Society (CNPS) RPR 1b and 2-ranked species. The following RPR plant species occur in wetland habitat types, and might be affected by the Project: *Epilobium oreganum*-Oregon fireweed; *Geum aleppicum* -Aleppo avens; *Ophioglossum pusillum*-Northern adder's tongue; and *Scutellaria galericulata*-Marsh skullcap.

No federally listed wildlife species have the potential to occur within the Project area. One federal candidate for listing, the Pacific fisher has the potential to occur. Three state-listed species have potential to occur: willow flycatcher, greater sandhill crane and bald eagle. California species of special concern which may occur within the Project area are foothill yellow-legged frog, Cascades frog, northwestern pond turtle, and yellow warbler.

There would be no permanent direct impacts from the project on any listed species or any candidate or special status species. The project area does not support typical denning features, but may be utilized by Pacific fishers during foraging. Recommendations for timing would result in late summer/fall construction and there should be no immobile young fishers or nesting birds at that time. If special status plants are identified during a pre-construction survey, their locations will be mapped and avoided or if unavoidable appropriate conservation measures will be implemented.

Based on the above information, a determination of "may affect, but is not likely to adversely affect" has been made for this project.

We respectfully ask for your concurrence on these findings and determination. If further information is required, please contact me at (530) 926-7510, or cityofms@nctv.com.

Thank you very much for your assistance with this project

Sincerely,

Theodore E. Marconi

Theodore E. Marconi,
City Manager
City of Mt. Shasta

encl

cc EDA Project Officer

Parker, Brian

From: Mary R Rudokas <mary.r.rudokas@eda.gov>
Sent: Tuesday, March 05, 2013 7:13 PM
To: Brian A Parker
Subject: Fw: RE: new project officer and where is the environmental stuff?

I love his ps.

All yours now...
Mary Rudokas | Civil Engineer | Economic Development Administration | Tel (206) 220-7694 | Fax (206) 220-7669

-----Forwarded by Mary R Rudokas/EDA on 03/05/2013 07:12PM -----
To: <mary.r.rudokas@eda.gov>
From: "Ted Marconi" <TMarconi@ci.mt-shasta.ca.us>
Date: 03/05/2013 06:11PM
Cc: <Brian.a.Parker@eda.gov>
Subject: RE: new project officer and where is the environmental stuff?

Mary,

We have reached a definite YES on the reconsideration. We are now working on the environmental narrative and will submit it electronically by the 13th. I could not figure out how to do it without engaging a consultant so we have done so. Hopefully that will put us ahead of the game when we begin the project. We have made contact with ACoE and FWS as well as CalTrans.

Brian, I can get you the letter requesting consideration tomorrow if that would be helpful. We had thought to submit it all at once on the 13th.

P.S. Does anyone have any idea if sequestration is going to impact this next round, and if so how.

Ted Marconi
City Manager
City of Mt. Shasta

From: mary.r.rudokas@eda.gov [mailto:mary.r.rudokas@eda.gov]
Sent: Tuesday, March 05, 2013 5:49 PM
To: Ted Marconi

Cc: brian.a.parker@eda.gov
Subject: new project officer and where is the environmental stuff?

Dear Ted,

I will be going on detail April 1, so there has been a reshuffling of duties in the office. Your new project officer is the very capable and friendly Brian Parker. He has your project folder, all of the emails and the application mods made through the last cycle. He is awaiting the YES we want to be reconsidered during the next cycle... due AT THE LATEST, by March 13. Remember, a new app is not needed but it would be beneficial to your consideration if the environmental narrative were complete and conveyed to Brian at that time.

I look forward to hearing great things about Mt. Shasta! Good luck.

Brian's contact information is:

Brian Parker

206 220 7675

Brian.a.Parker@eda.gov

Sincerely,

Mary

Mary Rudokas | Civil Engineer | Economic Development Administration | Tel (206) 220-7694 | Fax (206) 220-7669

-----"Ted Marconi" <TMarconi@ci.mt-shasta.ca.us> wrote: -----

To: <mary.r.rudokas@eda.gov>
From: "Ted Marconi" <TMarconi@ci.mt-shasta.ca.us>
Date: 01/22/2013 04:43PM
Subject: RE: IRC environmental review of Mt. Shasta application

Thank you Mary. I will put everyone to work as soon as I receive your official letter.

Ted Marconi
City Manager
City of Mt. Shasta

Parker, Brian

From: Mary R Rudokas <mary.r.rudokas@eda.gov>
Sent: Tuesday, March 05, 2013 7:13 PM
To: Brian A Parker
Subject: Fw: RE: new project officer and where is the environmental stuff?

make sure he has his consultant talk to Shannon. Looks like they overlooked SHPO...
Mary Rudokas | Civil Engineer | Economic Development Administration | Tel (206) 220-7694 | Fax (206) 220-7669

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Subject: new project officer and where is the environmental stuff?

Dear Ted,

I will be going on detail April 1, so there has been a reshuffling of duties in the office. Your new project officer is the very capable and friendly Brian Parker. He has your project folder, all of the emails and the application mods made through the last cycle. He is awaiting the YES we want to be reconsidered during the next cycle... due AT THE LATEST, by March 13. Remember, a new app is not needed but it would be beneficial to your consideration if the environmental narrative were complete and conveyed to Brian at that time.

I look forward to hearing great things about Mt. Shasta! Good luck.

Brian's contact information is:

Brian Parker

206 220 7675

Brian.a.Parker@eda.gov

Sincerely,

Mary

Mary Rudokas | Civil Engineer | Economic Development Administration | Tel (206) 220-7694 | Fax (206) 220-7669

-----"Ted Marconi" <TMarconi@ci.mt-shasta.ca.us> wrote: -----

To: <mary.r.rudokas@eda.gov>
From: "Ted Marconi" <TMarconi@ci.mt-shasta.ca.us>
Date: 01/22/2013 04:43PM
Subject: RE: IRC environmental review of Mt. Shasta application

Thank you Mary. I will put everyone to work as soon as I receive your official letter.

Ted Marconi
City Manager
City of Mt. Shasta

Parker, Brian

From: Mary R Rudokas <mary.r.rudokas@eda.gov>
Sent: Tuesday, March 19, 2013 1:11 PM
To: Kristine L Skrinde
Cc: Brian A Parker; Mary S Fitzgerald
Subject: mt shasta

shannon is in. She is responding to Matson now. On quick review the application is complete enough to go to IRC. Looks like they do not have Secton 106 and 7 consultation done but as you know this is not a showstopper. Shannon is reviewing environmental though so wait for her final call.

Mary Rudokas | Civil Engineer | Economic Development Administration | Tel (206) 220-7694 | Fax (206) 220-7669

Parker, Brian

From: Malinda S Matson <malinda.s.matson@eda.gov>
Sent: Wednesday, March 20, 2013 8:24 AM
To: Brian A Parker
Subject: mt. Shasta

Brian,

Would you mind if the applicant were on the call today with Senator Feinstein's office ? Is there anything in this discussion that they would not already be privy to?

Malinda

Parker, Brian

From: Brian A Parker <brian.a.parker@eda.gov>
Sent: Wednesday, March 20, 2013 8:34 AM
To: Malinda S Matson
Subject: Re: mt. Shasta

Malinda:

I have no problem with the applicant participating in the call. As a matter of fact, it would be good for whomever will be on the call from the City of Mt. Shasta to get some visibility into how our process actually works. From my perspective, this situation has much to do with misunderstandings that need to be cleared up.

Thank you for bringing this development to my attention.

Brian

-----Malinda S Matson/EDA wrote: -----
To: Brian A Parker/EDA@EDA
From: Malinda S Matson/EDA
Date: 03/20/2013 08:24AM
Subject: mt. Shasta

Brian,

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Malinda

Parker, Brian

From:	Brian A Parker <brian.a.parker@eda.gov>
Sent:	Wednesday, March 20, 2013 12:47 PM
To:	TC@feinstein.senate.gov
Cc:	Kim_Castle@feinstein.senate.gov; Malinda S Matson
Subject:	City of Mt. Shasta: EDA Grant Application Correspondence
Attachments:	Notice of Carry Forward - City of Mt. Shasta Signed.pdf

Thomas:

I am sending this message pursuant to our earlier conference call. A copy of the notice to carry forward the City of Mt. Shasta's application for funding from the 2nd Funding Cycle of Fiscal Year 2013 to the 3rd Funding Cycle is attached to this message for your records.

If you have any questions, you may send them through Malinda Matson.

Thank you for your interest.

Brian

Brian Parker
Economic Development Specialist

Seattle Regional Office
Economic Development Administration
915 Second Avenue, Room 1890
Seattle, Washington 98174-1012
(206) 220-7675 (Voice)
(206) 220-7669 (Fax)
E-Mail: brian.a.parker@eda.gov
World Wide Web: www.eda.gov

U. S. DEPARTMENT OF COMMERCE
Economic Development Administration
915 Second Avenue, Room 1890
Seattle, WA 98174
Fax: 206.220.7669
Voice: 206.220.7660

January 14, 2013

Mr. Theodore Marconi, City Manager
City of Mt. Shasta
305 N. Mt. Shasta Boulevard
Mt. Shasta, California 96067-2621

Dear Mr. Marconi:

The U.S. Economic Development Administration's (EDA) Seattle Regional Office Investment Review Committee (IRC) has considered your application for investment assistance in the current funding cycle to design and construct a wastewater interceptor and treatment plant lagoons. For each funding cycle, EDA receives many more meritorious proposals than it can fund. Although the IRC found your application consistent with EDA investment priorities, the Agency regrets to inform you that your application has not been selected for this cycle.

Although EDA cannot fund your project in this cycle, you may elect to have your application carried forward and re-considered in the next competitive funding cycle, which will begin on March 13, 2013. The option to carry your application forward does not guarantee that the application will be funded. The Seattle Regional Office IRC, however, is willing to re-consider your application for funding with other applications that are received in the next funding cycle.

If you would like EDA to carry your application forward and consider it in the next funding cycle, please respond in writing to this notice no later than March 13, 2013. If you do not respond, EDA will consider the application withdrawn. You also have the option of withdrawing the application and submitting a new or revised application for the next funding cycle.

Please do not hesitate to contact David Farnworth-Martin at david.j.farnworth.martin@eda.gov or (206) 220-7699 if you have any questions.

Thank you for your interest in EDA. For more information about our programs and other upcoming funding opportunities, please consult our website at www.eda.gov.

Sincerely,

A. Leonard Smith
Regional Director, Seattle Regional Office

Parker, Brian

From:	Brian A Parker <brian.a.parker@eda.gov>
Sent:	Wednesday, March 20, 2013 4:10 PM
To:	David J Farnworth Martin
Subject:	Fw: Congressional Contact, Office of Senator Dianne Feinstein: City of Mt. Shasta Grant Application
Attachments:	Meeting Minutes - Conference Call with Senator Feinstein's Office.docx

Keeping you in the loop.

-----Forwarded by Brian A Parker/EDA on 03/20/2013 04:09PM -----
To: A Leonard Smith/EDA@EDA
From: Brian A Parker/EDA
Date: 03/20/2013 03:43PM
Cc: Kristine L Skrinde/EDA@EDA, Richard A Manwaring/EDA@EDA, Mary S Fitzgerald/EDA@EDA
Subject: Congressional Contact, Office of Senator Dianne Feinstein: City of Mt. Shasta Grant Application

(See attached file: Meeting Minutes - Conference Call with Senator Feinstein's Office.docx)

Len:

I am sending this message to inform you that Shannon FitzGerald and I were on a conference call that was arranged by Malinda Matson with staff from Senator Dianne Feinstein's office earlier today. They wanted to discuss the issues impacting the grant application from the City of Mt. Shasta.

You should be aware that there could be a request forthcoming to expedite a decision on the application before the upcoming IRC Meeting sessions scheduled for April 9 and 10. According to a representative of an economic development organization in the region, the private beneficiary of property to be purchased in connection with the project is facing an escrow expiration deadline on April 4.

Meeting Minute notes were prepared and are attached to this message for your review and records.

If you have any questions, feel free to call or we can talk after your return to the office.

Thank you.

Brian

Brian Parker
Economic Development Specialist

Seattle Regional Office
Economic Development Administration
915 Second Avenue, Room 1890
Seattle, Washington 98174-1012
(206) 220-7675 (Voice)
(206) 220-7669 (Fax)
E-Mail: brian.a.parker@eda.gov
World Wide Web: www.eda.gov

Parker, Brian

From: Brian A Parker <brian.a.parker@eda.gov>
Sent: Tuesday, March 26, 2013 9:17 AM
To: Barbara A Smith
Cc: Kristine L Skrinde; A Leonard Smith; Richard A Manwaring
Subject: Congressional Inquiry: City of Mt. Shasta, CA
Attachments: EDA Congressional Inquiry Information Sheet - Funding Request Verification -- City of Mt. Shasta, CA.docx

Barbara:

The information you seek for the referenced applicant is contained in the form that is attached to this message.

My apologies for the delay in our response. I have had technical difficulty with my computer and have limited access to the network.

Thank you.

Brian

Brian Parker
Economic Development Specialist

Seattle Regional Office
Economic Development Administration
915 Second Avenue, Room 1890
Seattle, Washington 98174-1012
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E-Mail: brian.a.parker@eda.gov
World Wide Web: www.eda.gov

Economic Development Administration
Congressional Inquiry Information Sheet
Funding Request Verification

Date: March 26, 2013

Member of Congress/U.S. Senator Name: Senator Dianne Feinstein

Subject: City of Mt. Shasta

Regional Office: Seattle

Has EDA received an investment assistance application from the referenced subject?

☒ Yes ☐ No

For which program or funding opportunity was the application received?

Public Works and Economic Development Facilities

What is the processing status of the application? Under Review, Pending Investment Review Committee Evaluation

Are there any concerns or legal issues regarding the application? ☐ Yes ☒ No

If yes, describe the nature of the concerns or issues:

Comments/Additional Information: A conference call with Senator Feinstein's office was arranged by Malinda Matson, which included a representative of the City of Mt. Shasta and an interested party. The next steps of the application review process were discussed.

Parker, Brian

From: Malinda S Matson <malinda.s.matson@eda.gov>
Sent: Wednesday, March 20, 2013 8:37 AM
To: Brian A Parker
Subject: Re: mt. Shasta

Thank you. Just so you know - I have laryngitis. I will get the call going and then let you or Shannon take over. [redacted]

-----Brian A Parker/EDA wrote: -----
To: Malinda S Matson/EDA@EDA
From: Brian A Parker/EDA
Date: 03/20/2013 11:33AM
Subject: Re: mt. Shasta

Malinda:

I have no problem with the applicant participating in the call. As a matter of fact, it would be good for whomever will be on the call from the City of Mt. Shasta to get some visibility into how our process actually works. From my perspective, this situation has much to do with misunderstandings that need to be cleared up.

Thank you for bringing this development to my attention.

Brian

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From: Malinda S Matson/EDA
Date: 03/20/2013 08:24AM
Subject: mt. Shasta

Brian,

Would you mind if the applicant were on the call today with Senator Feinstein's office ? Is there anything in this discussion that they would not already be privy to?

Malinda

Parker, Brian

From: Mary S Fitzgerald <mary.s.fitzgerald@eda.gov>
Sent: Tuesday, March 19, 2013 2:38 PM
To: Malinda S Matson
Cc: A Leonard Smith; Angela D Ewell Madison; David J Farnworth Martin; Katherine W Dedrick; Kristine L Skrinde; Brian A Parker; Mary R Rudokas
Subject: Re: Mt. Shasta project

Hello Melinda,

I'm sorry that I wasn't here to be on a call. I was in transit from my home which is several hours north of Seattle.

I have reviewed the Environmental Narrative from the City of Mt. Shasta. The City of Mt. Shasta is in the process of consulting with the U.S. Fish and Wildlife Service and California State Historic Preservation Officer on the proposed project. If the application is invited for further consideration, EDA will need to directly consult with four Tribes as part of the National Historic Preservation Act Section 106 process. The applicant is applying to the U.S. Army Corps of Engineers for a Clean Water Act Section 404 permit for excavation and fill work in wetlands. As part of that process, the applicant will also need to obtain a Clean Water Act Section 401 Water Quality Certification from the California Regional Water Quality Control Board. They will also need to obtain coverage under a Stormwater National Pollutant Discharge Elimination System (NPDES) Permit, as well as encroachment permits.

In summary, the applicant is moving quickly on obtaining permits and approvals. Most consultations and permit approvals take longer than EDA's grant processing period. Therefore, we regularly include the completion of consultations and permits as special conditions in grant awards. If that should occur in this situation, it shouldn't be a problem.

I have a doctor's appointment tomorrow morning, but will be available anytime after 11 am for a conference call. I will also be available all day on Thursday.

Thank you, Shannon

Shannon FitzGerald / Regional Environmental Officer / Economic Development Administration
915 Second Ave., Room 1890, Seattle, WA 98174 / 206-220-7703 / fax: 206-220-7657 /
mary.s.fitzgerald@eda.gov

Parker, Brian

From:	Brian A Parker <brian.a.parker@eda.gov>
Sent:	Wednesday, March 20, 2013 3:44 PM
To:	A Leonard Smith
Cc:	Kristine L Skrinde; Richard A Manwaring; Mary S Fitzgerald
Subject:	Congressional Contact, Office of Senator Dianne Feinstein: City of Mt. Shasta Grant Application
Attachments:	Meeting Minutes - Conference Call with Senator Feinstein's Office.docx

Len:

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If you have any questions, feel free to call or we can talk after your return to the office.

Thank you.

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(206) 220-7675 (Voice)
(206) 220-7669 (Fax)
E-Mail: brian.a.parker@eda.gov
World Wide Web: www.eda.gov

Parker, Brian

From: Mary S Fitzgerald <mary.s.fitzgerald@eda.gov>
Sent: Tuesday, March 19, 2013 4:22 PM
To: Malinda S Matson
Cc: A Leonard Smith; Angela D Ewell Madison; Brian A Parker; David J Farnworth Martin; Katherine W Dedrick; Kristine L Skrinde; Mary R Rudokas
Subject: Re: Re: Mt. Shasta project

Hi Melinda,

Sounds good. SRO will call in at 11:30 PST/2:30 EST.

Thanks, Shannon

-----Malinda S Matson/EDA wrote: -----
To: Mary S Fitzgerald/EDA@EDA
From: Malinda S Matson/EDA
Date: 03/19/2013 03:34PM
Cc: A Leonard Smith/EDA@EDA, Angela D Ewell Madison/EDA@EDA, Brian A Parker/EDA@EDA, David J Farnworth Martin/EDA@EDA, Katherine W Dedrick/EDA@EDA, Kristine L Skrinde/EDA@EDA, Mary R Rudokas/EDA@EDA
Subject: Re: Re: Mt. Shasta project

All,

The conference call is scheduled for 2:30 EDST tomorrow, Wednesday March 20th.
(I can't send out a meeting request because my calendar has an all hands that has been rescheduled for next week)

1-877-316-5319
Leader: 372468
PIN: 449725
Thank you

Malinda

-----Mary S Fitzgerald/EDA wrote: -----
To: Malinda S Matson/EDA@EDA
From: Mary S Fitzgerald/EDA
Date: 03/19/2013 05:37PM
Cc: A Leonard Smith/EDA@EDA, Angela D Ewell Madison/EDA@EDA, David J Farnworth Martin/EDA@EDA, Katherine W Dedrick/EDA@EDA, Kristine L Skrinde/EDA@EDA, Brian A Parker/EDA@EDA, Mary R Rudokas/EDA@EDA
Subject: Re: Mt. Shasta project

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Thank you, Shannon

Shannon FitzGerald / Regional Environmental Officer / Economic Development Administration
915 Second Ave., Room 1890, Seattle, WA 98174 / 206-220-7703 / fax: 206-220-7657 /
mary.s.fitzgerald@eda.gov

Parker, Brian

From: Mary R Rudokas <mary.r.rudokas@eda.gov>
Sent: Tuesday, March 19, 2013 3:53 PM
To: Brian A Parker
Cc: Mary S Fitzgerald
Subject: Re: Re: Mt. Shasta project

This type of email I would send to Ted Marconi so he knows what is going on at HQ and doesn't get caught with his pants down. He knows what the lobbying group in DC is doing and can help to cool everyone's jets.... your choice...maybe he should even be in the call-suggest to Malinda?

Also, if you are on this call, it is considered a congressional contact. In Public Works if we get this, we codify it in written notes for file.

Mary Rudokas | Civil Engineer | Economic Development Administration | Tel (206) 220-7694 | Fax (206) 220-7669

-----Malinda S Matson/EDA wrote: -----
To: Mary S Fitzgerald/EDA@EDA
From: Malinda S Matson/EDA
Date: 03/19/2013 03:16PM
Cc: A Leonard Smith/EDA@EDA, Angela D Ewell Madison/EDA@EDA, Brian A Parker/EDA@EDA, David J Farnworth Martin/EDA@EDA, Katherine W Dedrick/EDA@EDA, Kristine L Skrinde/EDA@EDA, Mary R Rudokas/EDA@EDA
Subject: Re: Re: Mt. Shasta project

Shannon,

Thank you for this information. I have contacted Sen. Feinstein's office to see if we can reschedule for tomorrow afternoon. I will let you know as soon as I here.

Malinda

-----Mary S Fitzgerald/EDA wrote: -----
To: Malinda S Matson/EDA@EDA
From: Mary S Fitzgerald/EDA
Date: 03/19/2013 05:37PM
Cc: A Leonard Smith/EDA@EDA, Angela D Ewell Madison/EDA@EDA, David J Farnworth Martin/EDA@EDA, Katherine W Dedrick/EDA@EDA, Kristine L Skrinde/EDA@EDA, Brian A Parker/EDA@EDA, Mary R Rudokas/EDA@EDA
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Shannon FitzGerald / Regional Environmental Officer / Economic Development Administration
915 Second Ave., Room 1890, Seattle, WA 98174 / 206-220-7703 / fax: 206-220-7657 /
mary.s.fitzgerald@eda.gov

Parker, Brian

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Sent: Tuesday, March 19, 2013 3:35 PM
To: Mary S Fitzgerald
Cc: A Leonard Smith; Angela D Ewell Madison; Brian A Parker; David J Farnworth Martin; Katherine W Dedrick; Kristine L Skrinde; Mary R Rudokas
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