

# DEPARTMENT OF PUBLIC WORKS

# COUNTY OF HUMBOLDT

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#### NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

December 16, 2020

Humboldt County Department of Public Works is providing notice of the intent to adopt a Mitigated Negative Declaration of environmental impact for the following project in accordance with the California Environmental Quality Act:

PROJECT TITLE: McKay Community Forest Trail Plan

PROJECT DESCRIPTION: The proposed project would establish a trail network with approximately 31 miles of multi-use roads, multi-use trails, hiking trails, and mountain bike trails within the McKay Community Forest located southeast of Eureka. The purpose of the project is to create a place for residents and visitors of all ages and abilities to enjoy walking, hiking, mountain-biking, wheeling (in mobility devices), horseback-riding, learning, and connecting with the natural world. The Trail Plan describes the overall goals, objectives, guiding principles, design standards, and construction practices for building sustainable trails. Initial access points include Northridge Road, Harris Street, and Redwood Acres. Future access points are anticipated to be developed near Redwood Fields. Manzanita Avenue, and Walnut Drive within approximately two to five years (or longer) as large parcels are permitted for subdivision. Amenities include signs, restrooms, benches, and trash receptacles. Construction activities include vegetation clearing, removing stumps and roots, grading and surface preparation, forming the trailbed, placing and compacting the trail surface, forming drainage features, re-vegetation, and bridge installation. Ongoing maintenance activities include trail surface maintenance, erosion control, vegetation management, and repairing short-cuts. As a separate project, Humboldt County has initiated preparation of a Forest Stewardship Plan and nonindustrial timber management plan with a target completion date of September 2021.

<u>PURPOSE OF NOTICE</u>: The purpose of this notice is to inform the public that the Department of Public Works plans to recommend that the Humboldt County Board of Supervisors adopt a Mitigated Negative Declaration for the project. An Initial Study was prepared to identify potentially significant impacts on the environment, and it was determined that the project will have a less than significant effect on the environment with the incorporation of specified mitigation measures.

**LEAD AGENCY**: County of Humboldt

## ADDRESS WHERE COPY OF INITIAL STUDY IS AVAILABLE FOR REVIEW:

- Department of Public Works, 1106 Second Street, Eureka, CA 95501
- <a href="https://humboldtgov.org/1808/McKay-Community-Forest">https://humboldtgov.org/1808/McKay-Community-Forest</a>

<u>REVIEW PERIOD</u>: The review period begins <u>December 17, 2020</u>, and ends <u>January 19, 2021</u>. Public comments regarding the correctness, completeness, or adequacy of the Initial Study are invited. Comments received by the end of the review period will be considered before adoption of the Mitigated Negative Declaration. Public meetings for the project are not planned at this time. Written comments should be addressed to the Humboldt County Department of Public Works, 1106 Second Street, Eureka, CA 95501, or e-mailed to hseemann@co.humboldt.ca.us.

# **Initial Study and Proposed Mitigated Negative Declaration**

California Environmental Quality Act (CEQA) Environmental Study

# **McKay Community Forest Trail Plan**

**Humboldt County, California** 

**December 16, 2020** 

Prepared by:
Humboldt County Public Works Department
1106 Second Street
Eureka, CA 95501



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# 1.0 PROJECT OVERVIEW

**Project Title:** McKay Community Forest Trail Plan

Link to document: <a href="https://humboldtgov.org/1808/McKay-Community-Forest">https://humboldtgov.org/1808/McKay-Community-Forest</a>

<u>Project Summary:</u> The proposed project would establish trails, access points, and amenities to provide public access and recreation at the McKay Community Forest.

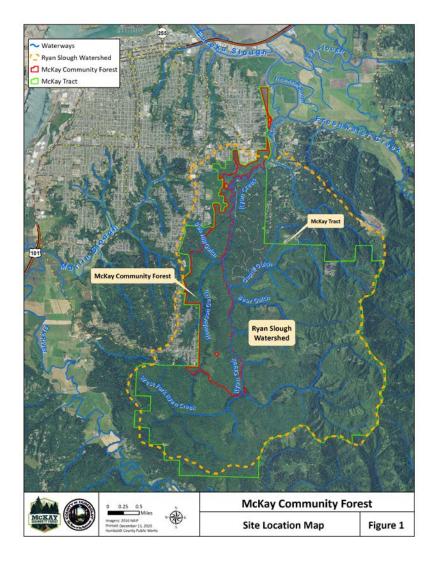
**<u>Lead Agency Name and Address:</u>** Humboldt County Public Works Department

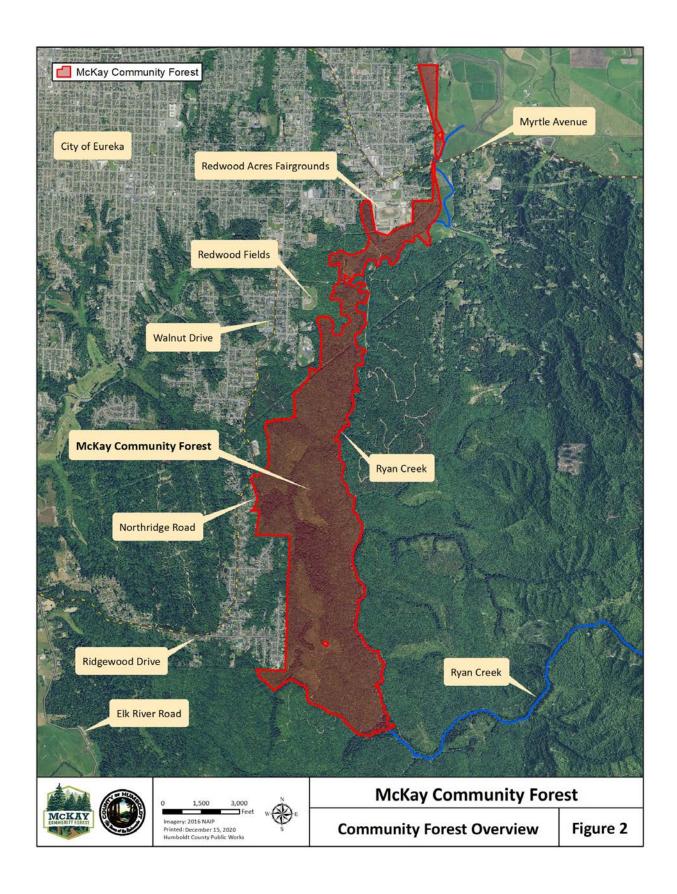
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<u>Contact Person:</u> Hank Seemann, Deputy-Director

707-445-7741 // <a href="mailto:hseemann@co.humboldt.ca.us">hseemann@co.humboldt.ca.us</a>

<u>Project Location:</u> The McKay Community Forest is located southeast of Eureka near Myrtletown, Cutten, and Ridgewood Heights within the watershed of Ryan Creek, a tributary of Humboldt Bay.





# **Affected Parcels:**

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APN	GIS	Current	Community Plan	Zoning with	In Coastal
	Acres	General Plan		Combining Zones	Zone
015-061-001	15.6	AE	HBAP	AE/T	Yes
015-171-001	6.2	AE	НВАР	AE/T	Yes
016-181-002	1.2	RL	НВАР	RS-5	Yes
016-191-004	0.6	RL	НВАР	RS-5	Yes
016-201-005	0.6	RL	НВАР	RS-5	Yes
017-031-013	71.9	P; TC	HBAP, ECP, FWCP	TPZ; TPZ/R	Yes
017-032-011	18.3	Р	ECP	TPZ	No
017-032-012	5.2	P; TC	НВАР, ЕСР	TPZ; TPZ/R	No
017-071-010	8.2	Р	ECP	TPZ	No
017-071-013	38.9	Р	ECP	TPZ	No
017-072-004	3.1	Р	ECP	TPZ	No
017-073-003	1.2	Р	ECP	TPZ	No
017-073-006	6.6	Р	ECP	TPZ	No
017-141-004	2.1	AE	НВАР	AE-60/A,F,T	Yes
017-151-007	6.7	AE, NR, RL	НВАР	AE-60/A,F,T	Yes
017-164-002	3.2	AE	HBAP	TC	Yes
017-173-003	3.7	AE	НВАР	TC	Yes
300-011-019	2	Р	FWCP	TPZ	No
300-011-024	226.6	P,T	ECP	TPZ	No
300-011-026	0.5	Р	ECP	TPZ	No
300-011-027	43.4	Р	ECP	R1*-Q/GO	No
303-011-004	81.6	Р	ECP	R1*-GO; TPZ	No
303-012-009	256.3	Р	ECP, Inland GP	TPZ	No
303-012-014	201.8	Р	ECP, Inland GP	TPZ	No
303-012-029	198.9	Т	ECP	TPZ	No
		i e			

# **Parcel Information Key:**

Α	Archeological Resource Area	NR	Natural Resource
AE	Agriculture Exclusive	Р	Public
APN	Assessor Parcel Number	Q	Qualified
ECP	Eureka Community Plan	R1*	Residential Single Family
F	Flood Hazard Areas		(minimum parcel size 6000 feet)
FWCP	Freshwater Community Plan	RL	Residential Low Density
GIS	Geographic Information System	RS-5	Residential Single Family (5-acre minimum)
GO	Greenway and Open Space	T	Transitional Agricultural Lands
GP	General Plan	TC	Coastal Timberland
HBAP	Humboldt Bay Area Plan	TPZ	Timber Production Zone

<u>Surrounding Land Uses:</u> Timber production, residential, public facility

#### Other Public Agencies Whose Approval Is Required:

- California Department of Fish & Wildlife (streambed alteration agreement under Fish and Game Code section 1602 for changes within the bed, bank, or channel of any river or stream).
- Coastal Commission (coastal development permit or *de minimis* waiver for development within the state jurisdiction portion of the coastal zone)
- Humboldt County Building and Planning Department (coastal development permit for development within the local jurisdiction portion of the coastal zone; special permit for development within the streamside management area unless determined to be ministerial in consultation with California Department of Fish & Wildlife).

## **Tribal Consultation:**

On February 10, 2020, Humboldt County sent a letter to the Wiyot Tribe, Blue Lake Rancheria, and Bear River Band of the Rohnerville Rancheria pursuant to Public Resources Code § 21080.3.1 providing notification of the project and inquiring whether the tribes desired to request consultation regarding tribal cultural resources. Correspondence regarding tribal consultation is discussed in Section XVIII of the Initial Study.

#### **CEQA Requirement:**

The McKay Community Forest Trail Plan is subject to the requirements of the California Environmental Quality Act (CEQA). CEQA encourages lead agencies and applicants to modify their projects to avoid potentially significant adverse impacts (CEQA Section 20180[c] [2] and State CEQA Guidelines Section 15070[b] [2]).

The Lead Agency for the proposed project is the County of Humboldt, per CEQA Guidelines Section 21067. Compliance with CEQA is being implemented through the Department of Public Works. The purpose of this Initial Study is to provide a basis for determining whether to prepare an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration. This Initial Study is intended to satisfy the requirements of CEQA (Public Resources Code, Div 13, Sec 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387).

Section 15063(d) of the State CEQA Guidelines states that an Initial Study shall contain the following information in brief form:

- 1) A description of the project including the project location
- 2) Identification of the environmental setting
- 3) Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to provide evidence to support the entries
- 4) Discussion of means to mitigate identified significant effects
- 5) Examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls
- 6) The name of the person or persons who prepared and/or participated in the Initial Study

The California Department of Fish & Wildlife is a trustee agency under CEQA.

The environmental checklist form contained in this document is based on Appendix G of the CEQA Guidelines (2020).

# 2.0 PROJECT DESCRIPTION

#### 2.1 Introduction

#### **Purpose**

The McKay Community Forest ("Community Forest") is located southeast of Eureka within the watershed of Ryan Creek, a tributary of Humboldt Bay. The Community Forest was established in 2014 for multiple purposes including public access and recreation, timber harvest, and watershed and resource conservation. The Community Forest is envisioned as a place for residents and visitors of all ages and abilities to enjoy walking, hiking, mountain-biking, wheeling, horseback-riding, learning, and connecting with the natural world.

The McKay Community Forest Trail Plan (December 16, 2020) provides a blueprint for the development of trails, access points, and amenities within the Community Forest. The full Trail Plan is available here: <a href="https://humboldtgov.org/1808/McKay-Community-Forest">https://humboldtgov.org/1808/McKay-Community-Forest</a>. The purpose of this Initial Study is to analyze the potential environmental impacts associated with specific elements of the Trail Plan and identify mitigation measures that are needed to ensure that the project does not have significant environmental impacts. The "project" that is analyzed in this Initial Study is summarized in Section 2.8.

#### Background

In 2009, Green Diamond Resource Company ("Green Diamond") began working with The Trust for Public Land to develop a three-phase conservation strategy for the Ryan Creek watershed, which included the concepts of establishing a publicly-owned community forest in two phases and creating a conservation easement over the majority of the land that will remain privately owned timberland. In August 2014, Humboldt County acquired approximately 997 acres of forestland as the Phase I acquisition of the McKay Community Forest. In June 2020, Humboldt County acquired approximately 197 acres as the Phase II expansion of the Community Forest, for a total size of approximately 1,194 acres. Also in June 2020, Phase III of the conservation strategy was completed through establishment of a conservation easement over approximately 5,976 acres of Green Diamond's remaining holdings in the McKay Tract. Completion of the Phase II and Phase III elements included a trail easement on a logging road owned by Green Diamond to provide a future connector trail from the Community Forest to Eggert Road.

### **Property and Vicinity**

The Community Forest is located southeast of Eureka along the urban interface with residential and commercial areas of Myrtletown, Cutten, and Ridgewood Heights (Figure 2). The Community Forest has an irregular property boundary, with a relatively narrow and constrained northern portion and wider and more expansive middle and southern portions. The western and northern boundaries are along the urban interface. The western border includes the North McKay Ranch Subdivision near Redwood Fields in Cutten. Ryan Creek and Ryan Slough form the eastern property boundary of the Community Forest. The Community Forest is bordered to the east and south by forestland owned by Green Diamond. The Community Forest abuts short segments of Harris Street, Northridge Avenue, Myrtle Avenue, and Park Street. A natural gas pipeline and electrical transmission lines owned by PG&E traverse the property. A private party owns an in-holding residential parcel (017-071-002) east of Redwood Fields and south of Redwood Acres. Humboldt Community Services District owns a 0.47-acre in-holding parcel (APN 303-012-020) within the southern portion of the Community Forest for a water tank.

The Community Forest contains approximately 1,125 acres of redwood-dominated forestland and approximately 69 acres of non-forested areas (e.g., aquatic habitat, roads, powerlines). The property

contains diverse topography including flat terraces and ridgetops, moderate to steep hillslopes, broad floodplains, and stream corridors for perennial, intermittent, and ephemeral streams. Soils are a mix of sand, silt, and clay derived from soft sedimentary deposits (primarily Hookton formation). Watercourses within the property include portions of Ryan Creek, Ryan Slough, Bob Hill Gulch, and Henderson Gulch. Many small and medium-sized tributaries are situated within steep-sided ravines. Wetlands are abundant, including features associated with springs or seeps and broader floodplain areas.

Most of the old-growth forest in the McKay Tract was harvested between the 1900s and 1930s. Some of the earliest lands to be harvested were relogged in the 1950s. Over two-thirds of the tract was commercially thinned between 1969 and 1984, and nearly half the tract was harvested using clearcut or shelterwood methods between 1975 and 1989. The Community Forest property has been subject to a series of harvests under Timber Harvest Plans (THPs) since the establishment of the Forest Practice Rules. The property contains a network of logging roads and informal use trails.

# 2.2 Planning Framework

#### **Vision and Goals**

The Trail Plan contains the following vision statement for public access and recreation:

The McKay Community Forest enhances the quality of life for Humboldt County residents and visitors by providing outstanding recreational opportunities. Recreational facilities will be compatible with adjacent land uses, forest stewardship, resource conservation, and a working forest. The McKay Community Forest will:

- Provide opportunities for people to maintain and improve health and fitness through outdoor physical activity.
- Provide recreational trails that enable people to seek challenges and engage in play.
- Provide a refuge where people can connect with nature, experience solitude and wildness, make discoveries, and observe natural beauty.
- Provide access to an outdoor classroom.
- Support appreciation of watershed services, forest management, and modern timber harvest practices.
- Nurture a sense of place in the greater Eureka area and boost civic pride.
- Promote tourism and support the local economy.

The Trail Plan contains the following management goals for public access and recreation:

- **Goal 1:** Provide an integrated trail system for a diversity of trail users.
- **Goal 2:** Promote a safe and secure environment for visitors of all ages and abilities.
- **Goal 3:** Protect the Community Forest's natural and cultural resources.
- **Goal 4:** Provide a trail information system.
- **Goal 5:** Foster community partnerships to assist with trail development and maintenance.
- **Goal 6:** Promote trail-oriented tourism and special events.
- **Goal 7:** Pursue linkages with other trails and recreational facilities.

The Trail Plan presents objectives for each management goal along with a set of guiding principles.

#### **Trail System Elements**

The trail system includes access points, trails, and amenities as described below.

Access points (also known as Trailheads) are the formal entryways to the Community Forest and provide the linkage between the broader community and the forested landscape of the Community Forest. Access points serve as meeting and gathering areas and provide information to help people plan their trip. A major access point provides designated off-street parking and more extensive amenities. A minor access point utilizes on-street parking and provides less extensive amenities.

**Trails** provide routes to pass through the Community Forest by foot, bicycle, horse, or mobility device. The term "trail" is used broadly to include multi-use roads, multi-use trails, hiking trails, and mountain bike trails. Trails include the surface tread, underlying foundation, bridges for creek crossings, and a variety of drainage, slope stabilization, and safety features. The Community Forest will provide natural surface trails composed of native soil or imported rock material.

**Multi-use Roads** provide vehicle access for management, maintenance, timber harvest, and emergency response and also serve as trails for recreational use. Multi-use roads are designed for vehicle loading and clearances which are normally more than adequate for a range of non-motorized users. One of the benefits of multi-use roads is they provide ample space to accommodate side-by-side travel.

**Multi-use Trails** are intended for all types of allowable non-motorized use. Multi-use trails are designed to accommodate a mixed traffic of users with a range of speeds and abilities. A subset of the multi-use trail will be **accessible trails**, which are designed for people with disabilities in accordance with the Architectural and Transportation Barriers Compliance Board's Accessibility Guidelines for Outdoor Developed Areas.

**Hiking Trails** are planned in areas with challenging terrain where a multi-use trail is not feasible or preferred. Hiking trails provide the opportunity to create smaller openings to allow for a more intimate experience in nature.

**Mountain Bike Trails** are planned to provide trail features designed specifically to enhance the mountain biking experience. Mountain bikers often prefer features that are technically challenging and provide an experience of play and discovery. Mountain bike trails are often kept narrow and have a preferred direction of travel.

The proposed trail network includes 11.1 miles of multi-use roads, 11.7 miles of multi-use trails, 1.1 miles of hiking trails, and 5.0 miles of mountain bike trails. Additional trails may be considered in the future. Equestrian use is expected on the majority of the multi-use roads and multi-use trails.

**Amenities** provide services and information. Potential amenities include signs, maps, information kiosks, lights, benches, restrooms, picnic tables, equestrian facilities, bike racks, fences, gates, garbage cans, and animal waste bag dispensers.

#### **Trail Design Standards**

The Trail Plan contains design guidelines (Section 2.8) for each trail type to help ensure that trails are designed for the intended recreational use. The design guidelines are intended to serve as general directions and recommendations rather than fixed rules and mandatory actions. This flexible design

approach allows trail segments to be developed in a manner most appropriate for on-the-ground conditions.

### **Progressive Development**

The designation of a trail segment as a multi-use road indicates that it is considered part of the Community Forest's permanent road network; however, the majority of roads have not been maintained for decades and require upgrades to meet the applicable requirements of the Forest Practice Rules. Roads within the Community Forest will be upgraded over the course of approximately 20 to 30 years based on funding and timber harvest planning. Therefore, progressive improvements will be a common practice. For example, a segment that is ultimately planned for a multi-use road could be improved to serve as a single-use or multi-use trail in the interim until the road segment is fully upgraded.

#### **Design Measures**

The Trail Plan identifies several design measures to minimize impacts and support the development of sustainable trails. Sustainable trails support recreational use while preserving the integrity of the landscape and holding their form over time with limited maintenance. Trails are not static but evolve over time due to compaction, displacement, and erosion. Managing water and people are the primary challenges for sustainable trails. The most enduring trails are well-drained and properly sloped, resist erosion, and blend with the surrounding area. Conformance to design standards and ensuring proper drainage will help prevent widening or formation of multiple treads from visitors trying to avoid water and mud. Concentrating visitor use on well-designed trails helps minimize impacts to the watershed and ecological communities.

#### Drainage

Sustainable trails are achieved by fitting the trail to the landscape and accounting for sufficient drainage. Drainage is a major consideration in trail design and construction. Without proper drainage, erosion from water movement can quickly damage a trail and cause impacts to vegetation and water quality. Problems are more likely to occur in situations where a trail alters natural drainage processes. Trail design must account for both surface and subsurface flow and for conditions that will occur during the wettest period of the year. A fundamental goal for managing drainage is to disperse runoff (an approach captured with the maxim "Slow it, spread it, sink it") and to avoid concentrating runoff volume and increasing flow velocities. In certain cases, it may be more appropriate to collect and route runoff in more concentrated flows (e.g., through a properly sized culvert with appropriate energy dissipation).

#### <u>Hillslopes</u>

Steep hillslopes are commonly encountered when trying to route a trail between two points. The preferred approach is to create contour trails which gently traverse a hillslope with gradual grades and allow stormwater to run across the trail rather than flowing down the length of the trail. The standard for constructing contour trails is to follow the Half Rule, which specifies that a trail's grade shouldn't exceed half the grade of the side-slope. For example, if the natural slope of the hillside is 20%, the grade of the trail traversing the hillside should be less than 10%; if the natural slope is 6%, the trail grade should be less than 3%.

A common rule-of-thumb is the 10 Percent Average Guideline, which specifies that the overall average trail grade from one end to the other should be less than 10 percent. Localized segments may exceed 10% (up to 15% to 20% in some cases), but a maximum grade ("short pitch maximum") should be determined based on site-specific conditions. Slope stabilization measures may be required in situations with especially steep slopes and terrain challenges.

#### **Grade Reversals**

Grade reversals are undulations (dips and rises) within the trail tread intended to catch water at the low point and divert it off the trail to lower ground in small volumes. Grade reversals effectively divide the trail into small sub-drainages and may be warranted as often as every 25 to 50 feet. The starting point for shaping the trail is seeking to accentuate the natural ground slopes. Techniques for implementing grade reversals include knicks and rolling grade dips. Knicks are semi-circular wedges of soil five to ten feet in diameter removed from the side of the trail. Rolling grade dips (also called drainage dips) combine a dip with a long, gentle ramp (ten to twenty feet from tip to tail). Grade reversals are optimally placed to align with naturally occurring drainage features on the hillslope. Some features may need to be reinforced or armored with rock for stability.

#### Outsloping

Trails should generally have a slight slope toward the downhill edge to help drain water off the trail in thin dispersed sheets. A rule-of-thumb for outsloping a trail is to provide a minimum cross-slope of 2% and maximum of 5%.

#### Cut and Fill

Two general trail construction techniques for crossing hillslopes are full bench construction and partial bench construction. Full bench construction involves excavation into the hillside to remove materials and soil to allow placement of the trail entirely on native, consolidated subsoil. This technique avoids constructing the trail on fill material and provides the best stability and longevity. Partial bench construction involves placement of unconsolidated fill material for some portion of the trail bed. Full bench construction techniques are generally preferred, especially for trails crossing steep terrain.

#### Wet Areas

Trails through areas with frequently saturated soils have the potential to cause problems for user access, resource impacts, and maintenance. Trail users will often walk to the side of wet areas to stay on higher ground, thus widening the trail and impacting vegetation. The preferred option is to select trail routes that avoid wet areas. Where avoidance is infeasible, the two basic trail designs for wet areas are constructing directly on the ground and raising the tread with a turnpike or raising the trail above the ground with a boardwalk. Raised tread trails are normally aligned along the existing high points within the wet area.

#### Flat Areas

Trails on flat terrain tend to form depressions, pond water, and generate a muddy surface. The trail tread should be slightly higher than the surrounding ground on at least one side to ensure proper drainage. Trails through flat areas can be built by importing four to six inches of aggregate to form an elevated trail bed with drainage swales on each side.

## **Trail Edges**

The ideal condition is for clearly defined edges to encourage users to stay on the established trail surface. The preferred approach is for trail edges to be defined with vegetation and standing trees. For special situations such as protecting sensitive areas or reducing hazards at drop-offs, edge protection using logs or rocks could be provided. However, edge protection with hard features should be used sparingly to avoid impairing drainage or creating trip hazards, and to allow a more natural-looking trail. Edge protection may be useful for providing non-visual tactile warnings or detectable wayfinding for trail users with visual disabilities, although edge protection is not required for accessible trails.

#### **Erosion Control**

Trail planning considers the local topography and geology and determines the route least likely to cause erosion, minimize the amount of soil cutting on slopes, minimize the amount of maintenance, and affords for best sustainability over the long term. By using the full bench construction technique for trail construction, the need for fill material is eliminated. This approach reduces the amount of exposed soil and the potential for erosion.

When constructing trails, care should be taken to only disturb and expose the minimum area necessary. Vegetation material (ferns, grass, forbs, small brush) and forest floor duff (leaves, needles, twigs, humus) will be saved and set to the side of the trail bed. Regardless of trail construction technique utilized, when individual trail segments or portions of segments are completed duff material is spread over any exposed soils, both native soils and imported material. The individual vegetation materials are then replanted to the sides of the trail in select areas that provide soil stabilization and show the most promise for replanting success. By doing this, surface covering and mulching is accomplished while trails are being developed. Mulching is potentially the most cost-effective sediment source control treatment by providing interception of rain drop energy, reduction of surface water flow velocities, and filtration of sediment in surface flows, along with weed suppression and aesthetic benefits. By grading the sides of the trail, covering exposed soils with native vegetation and duff material, and surfacing the trail where applicable, erosion during and after trail construction is kept to a minimum.

#### Renegade Trails and Short-cuts

To be fully sustainable, trails must provide an enjoyable and challenging experience and meet trail users' needs and expectations. A diverse and balanced trail network will help reduce the incentive for people to try to create their own trails (renegade trails) without permission. Some trail users are inclined to create or use short-cuts to reduce travel times. Short-cuts are often situated on steep slopes or traverse sensitive areas and are difficult to repair. The potential for short-cuts can be reduced by designing switchbacks and climbing turns such that the two legs of the trail are separated by trees, rocks, or other natural barriers.

#### Standards and Regulations

The following codes and regulations may apply to the certain activities project:

- Clean Water Act Sections 401 and 404
- Porter Cologne Act
- Fish & Game Code
- Coastal Act
- Humboldt County Zoning Ordinance

#### Timeline

Trail construction will begin in spring 2021, or as soon as public health guidelines allow. Build-out of the trail network may require three to five years or more.

## 2.3 Access Points included in Initial Study

The following four access points (Figure 3) are included as part of the project for this Initial Study.

#### **Northridge Access Point**

New parking and trailhead facilities were constructed near the intersection of Northridge Road and Walnut Drive in 2018, along with the construction of a left-turn pocket on Walnut Drive. The Northridge Access Point includes 26 standard vehicle parking spaces, four equestrian parking spaces, two accessible parking spaces, stormwater retention area, signage, lockable gate, and a paved area for a future portable restroom. Trees were removed over a 1.4-acre area in accordance with a Special Permit from the Building and Planning Department. This work was exempt from CEQA analysis under CEQA Guidelines 15304 (minor alterations to land) and exempt from timber harvest planning under the less-than-three-acre conversion exemption. The parking area was situated at the edge of the neighborhood (not directly across from any home). The Northridge Access Point is primarily intended to be a jumping-off point for trails within the Community Forest. Initially, amenities will include a portable restroom, bike rack, bench, waste receptacle, and animal waste bag dispenser. A permanent restroom with water and sewer service could be pursued in the future.

#### **Harris Street Access Point**

Harris Street is a major arterial road aligned in an east-west direction that spans City of Eureka and County of Humboldt jurisdiction. The section of Harris Street adjacent to the Community Forest near Redwood Acres is managed and maintained by Humboldt County Public Works. Harris Street provides access to the main logging road (R-line) that serves the Community Forest and the overall McKay Tract. A public access point to the Community Forest is planned along Harris Street between Redwood Acres and entrance to the R-line road. However, the R-line road is <u>not</u> intended to provide public access to the Community Forest due to poor sight distances and the potential for conflicts with logging trucks and other vehicles.

On-street parking is available near the Harris Access Point. Additional parking is available in the Redwood Acres parking lot located on the north side of Harris Street. A transit stop is situated approximately 750 feet to the east, on the north side of Harris Street. Amenities will be limited to an informational kiosk, bike rack, and waste receptacle. The County may consider future crosswalk enhancements such as traffic signs, high visibility crosswalk markings, bulb-outs, and/or new street lights.

### **Redwood Acres**

Redwood Acres is a regional event center and community hub managed by the Ninth District Agricultural Association, a state entity. Redwood Acres is surrounded by the McKay Community Forest on three sides. In 2016, Redwood Acres management expressed support for the concept of integrating Community Forest access within the Redwoods Acres property as an opportunity to offer additional activities and complement their core functions. The details of cooperative management of the access points and associated amenities will need to be defined in a Memorandum of Understanding. Parking for access to the Community Forest is not proposed within the main Redwood Acres site, except for accessible parking at designated parking spaces and equestrian parking at the stables (subject to a special permit from Redwood Acres). In 2016, Redwood Acres management indicated support for allowing public parking for Community Forest visitors in the large parking lot located north of Harris Street, consistent with posted restrictions for DMV use. Three trailheads to the Community Forest are proposed at Redwood Acres.

#### **Redwood Fields and North McKay Ranch Subdivision**

Redwood Fields is a youth sports complex located at the east end of Fern Street in Cutten and managed by the non-profit organization Redwood Field Committee. Redwood Fields is surrounded by the North McKay Ranch property, which is an approximately 80-acre group of parcels zoned for residential development. The County proposes to integrate public access to the Community Forest as part of the existing Redwood Fields complex and future subdivision of the McKay Ranch property. Redwood Fields is currently used for public recreation and is equipped with a large parking area. The establishment of trails to the Community Forest along with additional parking areas will be incorporated as part of the subdivision process for the North McKay Ranch property. Public Works determined that encroachment onto the eastern side of the North McKay Ranch property is necessary due to property line and topographic constraints in order to create a continuous trail connecting the northern and southern sections of the Community Forest. Conveyance of open space areas to the County to meet parkland dedication requirements as part of the North McKay Ranch property subdivision is expected to provide the property necessary to provide this trail connection.

# 2.4 Potential Future Access Points Not Included in Initial Study

#### Manzanita Avenue

Manzanita Avenue is a local road within Cutten near the northwest side of the Community Forest. The east end of Manzanita Avenue is separated from the Community Forest by private property which is currently undeveloped. Access to the Community Forest will be considered as a condition of approval when the adjacent parcels (APN 017-032-003 and 017-032-014) are permitted for subdivision and development.

#### **Mid-McKay Subdivision**

This approximately 88-acre property (APN 300-011-029) near Walnut Drive and Campton Road is zoned for residential development. Provisions for public access to the Community Forest will be evaluated after the subdivision process is initiated. The Eureka Community Plan specifies requirements for park dedications as a condition of subdivision.

#### **Park Street**

Park Street presents an opportunity for limited access to the northern portion of the Community Forest (north of Myrtle Avenue). A trail crossing must be established under the Ryan Slough Bridge at Myrtle Avenue before Park Street access could be opened. The next step would be to meet with adjacent residents and property owners and perform a more detailed evaluation of constraints.

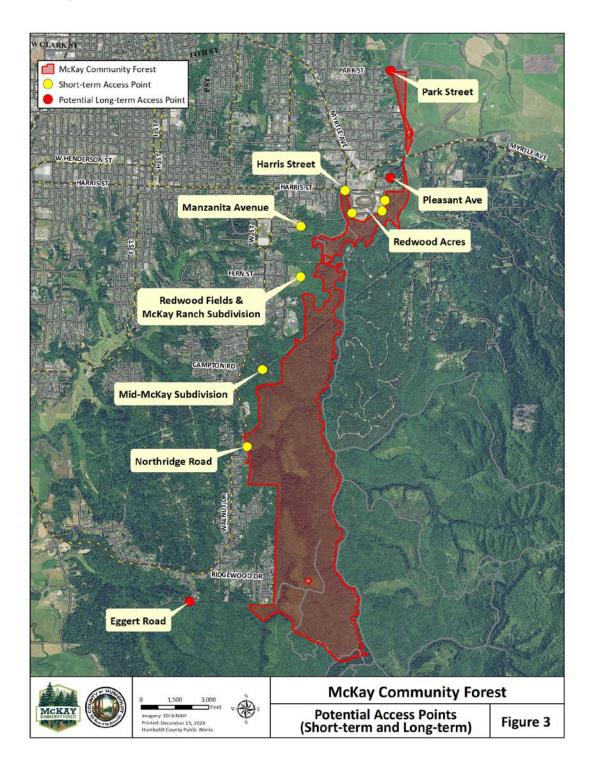
#### **Pleasant Avenue**

The Wright Refuge (2699 Pleasant Avenue) is owned by Humboldt Area Foundation (HAF) and managed by Humboldt State University Wildlife Department. This 5.85-acre property (APN 016-191-003) has a single-family residence and is adjacent to the Community Forest. The property is located near the intersection of Pleasant Avenue and Wellington Avenue. Discussions between the County and HAF regarding the future of this property have been initiated.

#### **Eggert Road**

In June 2020, Humboldt County acquired a trail easement on Green Diamond property extending along the West Fork of Ryan Creek from the southern end of the Community Forest to Eggert Road. A future trail is proposed on Green Diamond roads designated R-13-1, R-13-1-3, and ER-1. The trail would not be developed until a formal access point can be established near Eggert Road. One significant constraint is

the narrowness of Eggert Road. Current opportunities for an access point near Eggert Road have not been identified. A parcel (Assessor Parcel Number 303-012-022) owned by Green Diamond contiguous to Eggert Road has a land use designation of Open Space, Residential Low Density, and Timberland. If this parcel is subdivided for development in the future, an access point to the Eggert trail easement could likely be incorporated. Any proposed access point along Eggert Road would be subject to a future public review process.



#### 2.5 Trail Network

#### **Trails**

The Community Forest was divided into seven trail planning units based on logical boundaries such as streams, ridges, and roads (Table 1). The Trail Plan proposes approximately 31 miles of total trails including multi-use roads, multi-use trails, hiking trails, and mountain bike trails (Figure 4). Redwood Acres and Northridge will provide both equestrian access and accessible trails.

**Table 1: Trail Planning Units** 

Name	Total Trail Miles	Area (Acres)
Redwood Acres	3.0	79
Park Street	0.7	30
North McKay	2.0	105
Mid-McKay	5.0	144
South McKay	9.9	479
Northridge	3.5	113
Henderson Gulch	4.8	249
Su	ıbtotal: 28.9	1,198
Eggert Connector Trail	2.1	n/a

Total: 31.0

# **Bridges**

Bridges are necessary for crossing waterways and ravines. A total of 12 permanent bridges are planned as part of the road and trail network (Table 2). Ten bridges will be used for trails and two bridges (BR-3 and BR-12) will be used for forest management and logging use only. In addition, temporary rail-car bridges may be installed during timber harvest activities.

Table 2: Bridge

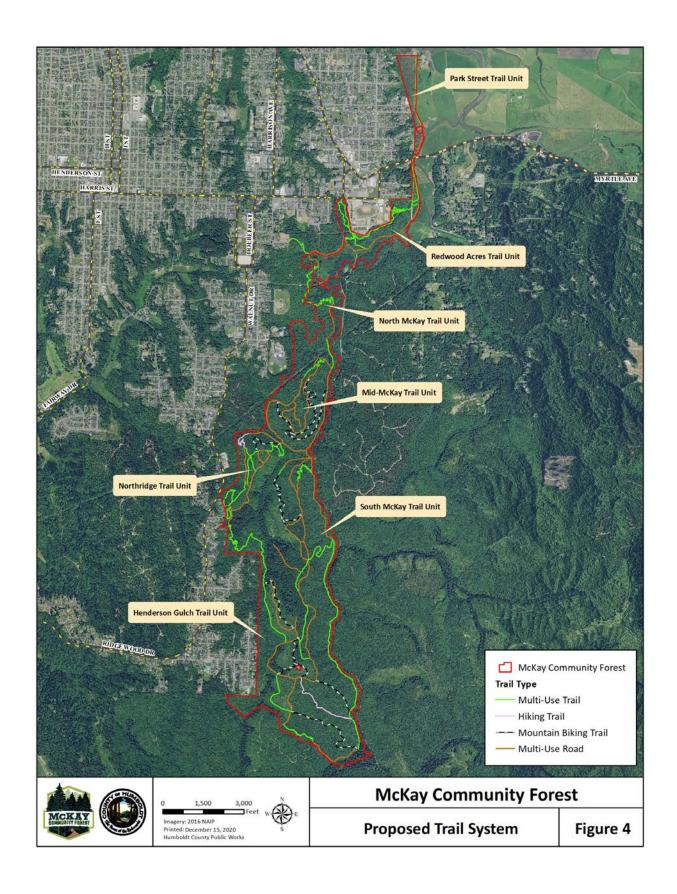
No.	Name	Waterbody	Span	Service
BR-1	Harris Trail Bridge	Unnamed ephemeral stream (ravine)	20 feet	Bike and pedestrian
BR-2	Ryan Ravine Bridge	Unnamed ephemeral stream (ravine)	25 feet	Bike, pedestrian, equestrian
BR-3	R-4 Bridge	Ryan Creek	90 feet	Large vehicles and equipment only (not for public use)
BR-4	Mid-McKay MBT Bridge	Unnamed ephemeral stream	15 feet	Bike and pedestrian
BR-5	Lower Henderson Gulch Bridge	Henderson Gulch	75-90 feet	Bike, pedestrian, equestrian, light vehicles
BR-6	Lower Bob Hill Gulch	Bob Hill Gulch	45 feet	Bike, pedestrian, equestrian,

	Bridge			light vehicles
BR-7	Upper Bob Hill Gulch Bridge	Bob Hill Gulch	20 feet	Bike, pedestrian, equestrian
BR-8	West Fork Henderson Gulch Bridge	West Fork of Henderson Gulch	15 feet	Bike, pedestrian, equestrian
BR-9	Upper Henderson Gulch Bridge	Henderson Gulch	20 feet	Bike, pedestrian, equestrian
BR-10	South McKay Creek Trail Bridge #2	Unnamed ephemeral stream (ravine)	30-35 feet	Bike, pedestrian, equestrian
BR-11	South McKay Creek Trail Bridge #1	Unnamed ephemeral stream (ravine)	25-30 feet	Bike, pedestrian, equestrian
BR-12	R-7.6 Bridge	Ryan Creek	90 feet	Large vehicles and equipment only (not for public use)

The major elements of a bridge include the deck, railing, beams, and abutments. A common bridge design for recreational trails is a wood deck with wood, fiberglass, steel, or aluminum beams. Other common bridge designs include pre-cast concrete (for spans up to 30 feet) and steel railcars (standard lengths are 45, 60, and 90 feet). Abutments are typically block structures (sills) made with concrete, plastic composite, or wood timbers. The need for piles is not anticipated. All bridges within the Community Forest can span their respective channels without piers.

#### **Bike Skills Park**

Redwood Coast Mountain Bike Association (RCMBA) proposes to collaborate with the County on the planning, development, operation, and maintenance of a Bike Skills Park near the Northridge access point. The Bike Skills Park would include a pump track, skills area, kids zone, and three sets of flow trails (easy, intermediate, advanced). These features would be integrated within the forest landscape. The Bike Skills Park would be located within the Northridge trail planning unit and encompass an area of approximately five acres.



## 2.6 Construction, Operation, and Maintenance

#### Construction

Trails will be constructed by volunteers, California Conservation Corps (CCCs), County Parks staff, and contractors. Trails can be constructed with hand work, motorized equipment, or a combination of both. Typical construction activities include vegetation clearing, removing stumps and roots, grading and surface preparation, forming the trailbed, placing and compacting the trail surface, forming drainage features, and re-vegetation. Hand tools for trail-building include Pulaskis (two-side tool with axe and hoe), McLeods (two-side tool with rake and hoe), pry bars, shovels, chainsaws, loppers, machetes, hand saws, and griphoists. Common motorized equipment for trail-building includes vibrating plate compactors, walk-behind earthmovers, mini-dozers, mini-excavators, and backhoes. Imported material can be transported in wheelbarrows, motorized carriers, or dump trucks.

Hand work allows trails to be built with a light touch and nuanced shaping and sculpting. Trail construction with volunteers provides the additional benefit of fostering a connection between the community and the trail. Motorized equipment is faster but more expensive. Light-touch construction with motorized equipment is possible with a skilled operator. In some situations, motorized equipment is the only option due to the amount of grading and earth-moving required.

Bridges BR-3, BR-5, BR-6, and BR-12 will be railcar bridges set in place with an excavator. The remaining bridges will be installed using hand labor and tools. Bridge BR-5 may require a small amount of bank stabilization using half-ton to one-ton rocks. For some bridges a relatively small amount of riparian vegetation will need to be removed for the approaches.

The first trail units to be constructed are Northridge and Redwood Acres, followed by Mid-McKay and South McKay. Completion of the trail units may depend on securing funding for constructing any bridges within the units. Construction of the North McKay trail unit will be deferred until the trail encroachment onto the McKay Ranch subdivision is formalized. Construction of the Park Street trail unit will not occur until there is additional planning for suitable access at Park Street, PG&E addresses the sinkhole along their gas distribution line, the trail undercrossing for Myrtle Avenue is designed and permitted, and a coastal development permit or *de minimis* waiver is obtained.

# **Operation and Maintenance**

Trails in the Community Forest will require operation and maintenance to keep them in a safe and usable condition. Operations include opening and closing gates, waste disposal, and implementing temporary measures (warnings and closures) during timber harvest operations. Maintenance encompasses a range of routine and non-routine tasks, including:

- Trail surface maintenance. The center of the trail may become compacted with use over time, resulting in a U-shaped tread that traps water. Loose material can collect on the outer edge of the trail, forming a berm that traps water. A periodic maintenance activity is filling and grading depressions in the trail tread, removing edge berms, and re-reconditioning drainage features such as drainage dips. Maintaining the surface of accessible trails will be a priority.
- Erosion control. Work will be needed to manage hillslope runoff coming on to the trail system and to implement various slope stabilization measures.
- Vegetation control. Clearing fallen branches, limbs, and trees, especially after storms.
- Responding to vandalism, repairing short-cuts, and decommissioning renegade trails.

# 2.7 Separate but Related Plans and Projects

# Forest Stewardship Plan and Non-industrial Timber Management Plan

The County has begun developing a Forest Stewardship Plan and Non-industrial Timber Management Plan ("NTMP") to guide timber harvest activities and watershed and resource conservation within the Community Forest. The Forest Stewardship Plan will address how silviculture, fire risk reduction, wildlife habitat restoration, carbon sequestration, monitoring, and adaptive management will be implemented over the term of the plan. The NTMP will be a long-term plan, prepared by a registered professional forester, demonstrating how the County intends to comply with the California Forest Practice Rules and associated laws and regulations. Following review and public comment, CAL FIRE will determine whether the NTMP is in conformance with the Forest Practice Rules. CAL FIRE's program for reviewing and approving NTMP's is exempt from the requirement to prepare an EIR under CEQA, and the NTMP functions as the equivalent of an EIR. Technical studies to support the Forest Stewardship Plan and NTMP include a forest inventory and analysis, inventory of controllable sediment discharge sites, and a geomorphic and geological analysis. The scheduling goal is to complete these plans in mid-2021 and to perform the first commercial timber harvest by the end of the 2021 season.

#### **Restoration Projects**

In August 2020, Thomas Gast and Associates released a report documenting a broad study of restoration opportunities along lower Ryan Creek and other tributaries of Humboldt Bay, including five sites within the Community Forest. Associated with this report, Michael Love and Associates (July 2020) prepared a Conceptual Design Report containing a 10% design for a project that would establish off-channel ponds along the Cutten Branch, a tributary to Ryan Creek. This project had the highest rank among currently feasible projects within the Thomas Gast and Associates August 2020 study. Funding for final design, permitting, and construction for this project will be pursued.

In November 2019, Pacific Watershed Associates (PWA) published a 65% Basis of Design Memorandum for the Ryan Creek Off-Channel Coho Habitat Improvement Design Project (Phase 1). This report describes the design for two alcove projects along Ryan Creek. A portion of the work would be situated along the left bank of Ryan Creek on County property.

In July 2016, the U.S. Fish and Wildlife Service published a technical report assessing opportunities for off-channel habitat improvements along lower Ryan Creek. The report includes analysis of collected data and a review of historical photographs. Concept 3 (lower R-Line wetland exit channel), Concept 4 (enhance fish passage across R-Line with causeway), and Concept 5 (investigate and analyze fish passage connections between Ryan Creek, Cutten Branch overflow wetland, and upper R-Line wetland) are located on County property. Funding to further advance these concepts will be pursued.

#### North McKay Ranch Subdivision EIR

In May 2020, the Humboldt County Planning and Building Department released the draft Environmental Impact Report (DEIR) for the North McKay Ranch Subdivision Project. The DEIR states that the proposed project is anticipated to be developed in nine phases over a period of 20 years. The proposed project consists of the development of 320 dwelling units, 22,000 square feet of commercial uses, approximately 21.73 acres of undeveloped open space. The preliminary site plan depicts six open space areas. Four of these areas (COH 201, COH 202, COH 204, COH 205) are adjacent to the McKay Community Forest. The proposed project would provide 20-foot-wide trail easements and construct trail connections to the McKay Community Forest. The DEIR states, "A temporary trail would be provided from Fern Street, Arbutus Street, or Redwood Street to the McKay Community Forest as part of the project's first phase, and would be abandoned as each subsequent phase and accompanying trails

are developed." Phase 3 would include trail connections from Arbutus Street/Oakview Drive and Canyon Lane, and Phase 8 or 9 would include a trail connection from Oakview Drive. The DEIR will be revised based on comments received during the public review period to create the final EIR. The General Plan amendment and final EIR for the North McKay Ranch Subdivision Project will be transmitted for review and approval by the Planning Commission and Board of Supervisors. Transfer of the open space areas to the County could occur in 2021.

# 2.8 Summary of Proposed Project

# **Proposed Project**

The proposed project analyzed in this Initial Study includes development, operation, and maintenance of the following elements:

- Multi-use trails, mountain bike trails, hiking trails, and interim use of multi-use roads as described in the Trail Plan (December 16, 2020).
- Northridge Access Point.
- Harris Street Access Point.
- Redwood Acres Access Points.
- Redwood Fields Access Point.
- Bike Skills Park near Northridge Access Point.

Collectively these actions comprise the project under CEQA.

#### **Actions Not Included in Proposed Project**

The following actions are not covered under this Initial Study:

- Timber harvest activities. These activities will be included in the County's NTMP.
- Construction and upgrade of new logging roads to the standards of the Forest Practice Rules. These activities will be included in the County's NTMP.
- Other potential future access points (e.g., Manzanita Avenue, Mid-McKay Subdivision, Park Street, Pleasant Avenue, Eggert Road). Other access points would warrant further review at the point when the actions are sufficiently defined to allow analysis of potential environmental impacts and to determine how CEQA applies.
- Restoration projects. These activities will be subject to their own CEQA analysis.

## 3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the proposed project, and would involve at least one impact that is determined to be a **"Potentially Significant Impact"**:

	Aesthetics		Agriculture and Forestry Resources	Air Quality
	Biological Resources	$\boxtimes$	Cultural Resources	Energy
	Geology / Soils		Greenhouse Gas Emissions	Hazards & Hazardous Materials
$\boxtimes$	Hydrology / Water Quality		Land Use / Planning	Mineral Resources
	Noise		Population / Housing	Public Services
	Recreation		Transportation	Tribal Cultural Resources
$\boxtimes$	Utilities / Services Systems		Wildfire	Mandatory Findings of Significance

Detailed explanations are provided in the checklist on the following pages. All answers take into account the whole action involved, including off-site as well as on-site; cumulative as well as project-level; indirect as well as direct; and construction as well as operational impacts. The explanation of each issue identifies: (a) the significance criteria or threshold, if any, used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to a less than significant level.

In the checklist the following definitions are used:

- "Potentially Significant Impact" means there is substantial evidence that an effect may be significant.
- "Potentially Significant Unless Mitigation Incorporated" means the incorporation of one or more mitigation measures can reduce the effect from potentially significant to a less than significant level.
- "Less Than Significant Impact" means that the effect is less than significant and no mitigation is necessary to reduce the impact to a lesser level.
- "No Impact" means that the effect does not apply to the project, or clearly will not impact nor be impacted by the project.

**DETERMINATION**: (To be completed by the Lead Agency on the basis of this initial evaluation)

	, , , , , ,	,
	I find that the proposed project COULD NOT ha NEGATIVE DECLARATION will be prepared.	ave a significant effect on the environment, and a
$\boxtimes$	I find that although the proposed project could there will not be a significant effect in this case by or agreed to by the project proponent. A MI prepared.	because revisions in the project have been made
	I find that the proposed project MAY have a sign ENVIRONMENTAL IMPACT REPORT is required.	
	been addressed by mitigation measures based	
	NEGATIVE DECLARATION pursuant to applicabl mitigated pursuant to that earlier EIR or NEGA	ve been analyzed adequately in an earlier EIR or e standards, and (b) have been avoided or
	Hanh Selman	December 16, 2020
Signatur	re	Date

# 4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

Pursuant to Section 15063 of the California Environmental Quality Act Guidelines, a brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the projects outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards.

	Except as provided in Public Resources Code , would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Threshold of signification the physical environal control of the physical environal envi	ntial adverse effect on a scenic vista? <u>cance</u> : Temporary or permanent change in nment that would be perceived by the public the views or lines of sight from a scenic vista.			$\boxtimes$	
limited to, tree within a state  Threshold of significations and the state of the signification of the state of the signification of the significance of the	damage scenic resources, including, but not es, rock outcroppings, and historic buildings scenic highway?  cance: Permanent change to the physical would eliminate or substantially alter or ources within a state scenic highway.				
c) In nonurbanize visual characte surroundings? from publicly a urbanized are zoning and otl	ed areas, substantially degrade the existing er or quality of public views of the site and its (Public views are those that are experienced accessible vantage point). If the project is in an a, would the project conflict with applicable her regulations governing scenic quality?  Cance: Permanent changes in the project area e the key elements of the visual character or				
d) Create a new s would adverse Threshold of signifi permanent source	source of substantial light or glare, which ely affect day or nighttime views in the area? <u>cance</u> : Introduction of a temporary or of light or glare that would detract from an vise subject to little artificial light or glare.				

#### **DISCUSSION:**

**I. (a)** - Less than significant impact: A "scenic vista" is considered a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. According to the Scenic Resources section of the Final Environmental Impact Report for the Humboldt County General Plan Update (Humboldt County, 2017), important scenic vistas in Humboldt County include viewpoints from

major public roadways and public areas providing views of the coast, forests, open space, or agricultural lands, as well as views of historic districts, landmarks, and cultural sites.

Except for the Park Street trail planning unit, the project will not be visible from public roadways or public areas. The Park Street trail planning unit will include a trail that occupies the prism of a former logging railroad adjacent to tidal wetlands and agricultural land. The project will not change this landform significantly and the presence of people recreating on a trail is not considered an adverse impact.

- **I. (b) No impact:** The project will not be visible from a state scenic highway.
- **I. (c) Less than significant impact:** The vicinity of the project is a mix of urbanized and nonurbanized areas. "Visual character or quality" refers to the visual attributes of the elements in a landscape and the relationships between those elements. The visual character of the project area is defined by the forest setting. The project actions involve clearing and grading on the ground surface to create trails and placement of relatively small bridges. The low profile of these features will not alter the forest setting nor obstruct views. The features introduced by the project will be consistent with, and not detract from, the visual character of the surrounding area. The limited expanse of the project features and the consistency with existing roads and trails result in the impacts being less than significant.
- **I. (d)** Less than significant impact: Placement of lights at access points is not currently planned but could be considered in the future if warranted. Lights would likely be solar powered or mounted on an existing utility pole. Equipment would be selected to direct light downward and away from other properties. The proposed access points receive light from vehicles and adjacent development under existing conditions so the area is not considered sensitive to new light sources.

**MITIGATION MEASURES:** No mitigation required.

FINDINGS: The Project would have Less than Significant Impact on Aesthetics.

II. AGRICULTURE AND FORESTRY RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul> <li>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</li> <li>Threshold of significance: Conversion of more than one acre of agricultural lands that are designated under the Farmland Mapping and Monitoring Program.</li> </ul>				$\boxtimes$
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?  Threshold of significance: Change in land management or land use regulation that would substantially affect agricultural activities in more than one acre of lands zoned for agriculture, particularly lands under Williamson Act contracts.				$\boxtimes$

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?		$\boxtimes$
<u>Threshold of significance</u> : Change in land management or land use regulation that would substantially affect more than one acre of forestland or timberland.		
<ul> <li>d) Result in the loss of forest land or conversion of forest land to non-forest use?</li> <li>Threshold of significance: Conversion of more than three acres of forest land to non-forest uses.</li> </ul>		
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?  Threshold of significance: Introduction of changes into the		$\boxtimes$
project area that would substantially affect the viability of more than one acre of farmland or forestland.		

#### **DISCUSSION:**

- **II. (a) through (b) No impact:** No Prime Farmland, Unique Farmland, Farmland, or land under Williamson Act contract are present within or adjacent to the project area. Therefore, the project will result in no impact to these resources.
- **II. (c) through (e) No impact:** The access points, trails, and amenities are intended to be integrated into the Community Forest while allowing the property to continue to be managed for sustainable timber harvest and other forest management goals and objectives. One of the main principles of community forestry is the compatibility between recreational use and active forest management. As a separate effort, the County is developing a Forest Stewardship Plan and Nonindustrial Timber Management Plan to guide forest management and timber harvest activities.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The Project would have **No Impact** on Agriculture and Forestry Resources.

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?      Threshold of significance: Project-related effect that would directly interfere with the attainment of long-term air quality objectives.				

b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			
Thre	eshold of significance: Generation of pollutants by the			
proj	ect that would cumulatively contribute to non-attainment			
for a	any priority pollutant.			
c)	Expose sensitive receptors to substantial pollutant concentrations?			
<u>Thre</u>	eshold of significance: Pollutant loading generated by the			
proj	ect near sensitive receptors that would result in a locally			
sign	ificant air quality impact.			
d)	Result in other emissions (such as those leading to odors)			
	adversely affecting a substantial number of people?		$\boxtimes$	
Thre	eshold of significance: Release of a project-related odor			
that	would affect a substantial number of receptors.			

#### **DISCUSSION:**

The project is located within the North Coast Air Basin and subject to the jurisdiction of the North Coast Unified Air Quality Management District (Air District). The following information was obtained from the Air District website (<a href="http://www.ncuagmd.org/index.php?page=agplanning.cega">http://www.ncuagmd.org/index.php?page=agplanning.cega</a>).

Humboldt County is listed as "attainment" or "unclassified" for all federal and state ambient air quality standards except the state 24-hour standard for particulate matter of 10 microns or less (PM<sub>10</sub>), for which Humboldt County is designated "nonattainment." PM<sub>10</sub> air emissions include chemical emissions and other inhalable particulate matter with an aerodynamic diameter of less than 10 microns. PM<sub>10</sub> emissions include smoke from wood stoves, airborne salts, diesel exhaust, and other particulate matter naturally generated by ocean surf. Primary sources of particulate matter include on-road vehicles (engine exhaust and dust from paved and unpaved roads), open burning of vegetation (both residential and commercial), residential wood stoves, and stationary industrial sources (factories). In 1995, the Air District conducted a study to identify the major contributors of PM<sub>10</sub>, which is summarized in the draft report entitled Particulate Matter PM<sub>10</sub> Attainment Plan. According to the Air District website, this report should be used cautiously as it is not a document that is required in order for the Air District to come into attainment for the state standard. Cars and trucks and other vehicles are considered a source of particulate matter within the district. Fugitive emissions as a result of vehicular traffic on unpaved roadways are the largest source of particulate matter emissions within the district.

In determining whether a project has significant air quality impacts on the environment, planners typically apply their local air district's thresholds of significance to projects in the review process. However, the Air District has not formally adopted significance thresholds, but rather utilizes the Best Available Control Technology emission rates for stationary sources as defined and listed in the Air District's Rule 110 - New Source Review And Prevention of Significant Deterioration. The Air District does not currently have thresholds for toxics but recommends the use of the latest version of the California Air Pollution Control Officers Association's "Health Risk Assessments for Proposed Land Use Project" to evaluate and reduce air pollution impacts from new development.

III. (a), (b), (c), (d) - Less than significant: Air quality impacts for the proposed project are associated with typical construction-related activities such as delivery of aggregate and building materials and operation of heavy equipment. Air emissions associated with these activities are minor and of limited duration, and do not present a significant exposure concern. Emissions from construction-related vehicles and equipment will dissipate into the atmosphere before they could expose people working or residing in the area to substantial pollutants. Based on knowledge of emissions from similar projects, calculation of estimated emissions is not necessary to conclude with certainty that the project would have a less than significant impact on increases of any criteria pollutants, and would not result in cumulatively considerable net increases of any criteria pollutants.

The project would be consistent with the Air District's  $PM_{10}$  Attainment Plan as the project does not include the operation of woodstoves or hearths and would not emit  $PM_{10}$  at levels that would exceed the Air District's threshold of 15 tons per year. This project will not conflict with or obstruct implementation of the Air District's air quality objectives or standards, or contribute in a substantive way to a non-attainment of air quality objectives in the project area air basin.

The project is subject to the Air District's Rule 104, Section D, for fugitive dust emissions. Pursuant to Rule 104, no person shall allow handling, transporting, or open storage of materials in such a manner which allows or may allow unnecessary amounts of particulate matter to become airborne. Further, reasonable precautions shall be taken to prevent particulate matter from becoming airborne, including:

- (1) Covering open bodied trucks when transporting materials likely to give rise to airborne dust;
- (2) The use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
- (3) The application of asphalt, oil, water or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can give rise to airborne dusts.
- (4) The prompt removal of earth or other track out material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The Project would have **Less Than Significant Impact** on Air Quality.

IV. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
<u>Threshold of significance</u> : Uncompensated loss of any plant or animal species or individuals listed as rare, threatened, or endangered by federal or state government, or loss or degradation of habitat that supports such species.				

<ul> <li>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</li> <li>Threshold of significance: Uncompensated loss of more than an incidental and minor area of riparian habitat or other sensitive habitat type (excluding wetlands defined by Section 404 of the Clean Water Act) identified under federal, state or local policies.</li> </ul>		
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?  Threshold of significance: Uncompensated loss or severe degradation of more than an incidental or minor area of wetlands as defined by Section 404 of the Clean Water Act.		
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?  Threshold of significance: Uncompensated loss or substantive modification of key habitat areas that provide for continuity of movement for resident or migratory wildlife, or loss or substantive degradation of key habitat components that would result in loss of use of important wildlife concentration areas.		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?  Threshold of significance: Uncompensated loss of important biological resources that is inconsistent with local ordinance or policies.		
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?  Threshold of significance: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.		$\boxtimes$

#### **DISCUSSION:**

#### Overview

The Community Forest is dominated by coastal redwood and Douglas-fir, with small components of grand fir, western hemlock, Sitka spruce, and red alder, and supports terrestrial and aquatic habitat for a variety of species.

#### Rare Plants and Sensitive Natural Communities

# Special-status plant species are defined as:

- 1. Species listed, proposed, or under review as threatened or endangered under the federal Endangered Species Act of 1973 and/or the California Endangered Species Act;
- 2. Species designated as rare under the California Native Plant Protection Act; and/or
- 3. Taxa that meet the criteria for listing as described in Section 15380 of the CEQA Guidelines, including species listed on California Department of Fish and Wildlife's (CDFW's) Special Vascular Plants, Bryophytes, and Lichens List (CDFW 2018a), plants with a California Rare Plant Rank (CRPR) of 1, 2, 3, or 4, and/or species considered a locally significant species (i.e., rare or uncommon in the county or region).

**Sensitive natural communities** are defined as those natural community types (i.e., legacy natural communities in CDFW's California Natural Diversity Database [CNDDB], vegetation alliances and/or associations) with a state ranking of S1 (critically imperiled), S2 (imperiled), or S3 (vulnerable) on CDFW's California Sensitive Natural Communities List (CDFW 2018b) or in the CNDDB (CDFW 2019).

Surveys for special-status plant species and sensitive natural communities were performed along the proposed trail corridors within selected trail planning units in 2019 and 2020 as shown on Table 3. Results are summarized on Table 4. For each year, spring and summer surveys were performed to capture all pertinent bloom periods. Surveys were performed by a two-person team composed of a qualified botanist and ecologist. Surveys followed the methods of the *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants* (USFWS 1996) and *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018). All vascular plant species were identified following the taxonomy of the *Jepson eFlora* (Jepson Flora Project 2020). Surveys for three nonvascular special-status species (two bryophytes, one lichen) utilized laboratory procedures (dissection). Bryophyte species were identified using the taxonomy of the *California Moss eFlora* (Wilson 2020).

Table 3: Plant Surveys Performed in 2019 and 2020

Trail Planning Unit	Segments	Year	Report
Redwood Acres	All except RA-18, RA-19, RA-20	2019	Stillwater Sciences (2019)
Redwood Acres	RA-18, RA-19, RA-20	2020	Stillwater Sciences (2020)
North McKay	All	2020	Stillwater Sciences (2020)
Mid-McKay	All	2019	Stillwater Sciences (2019)
South McKay	SM-1, portion of SM-2	2019	Stillwater Sciences (2019)
South McKay	All except SM-1	2020	Stillwater Sciences (2020)
Henderson Gulch	HG-4, HG-5	2020	Stillwater Sciences (2020)

Table 4: Summary of Results from 2019 and 2020 Plant Surveys

Species	Status	Location	Description	Potential Impact
		(trail planning unit)		
Carex lyngbyei (Lyngbye's sedge)	CRPR 2B.2	Redwood Acres (RA-7, RA-8, RA-20)	Multiple occurrences ranging from 100 individuals to over 1,000 individuals along the banks of Ryan Creek, separated from the trail corridor by a forested elevated berm.	No impact
Pleuropogon refractus (nodding semaphore grass)	CRPR 4.2	Mid-McKay (MM-01) Northridge (BG-01) South McKay (SM-01)	Small number of individuals (typically 1 to 3 individuals) on or adjacent to former timber roads within the Survey Area.	Potential disturbance, will be flagged for avoidance or re- location
Chrysosplenium glechomifolium (Pacific golden saxifrage)	CRPR 4.3	Mid-McKay (MM-01, MM-02, and MM-03)	Several occurrences ranging from 5 to over 1,000 individuals in small to extensive patches along the Ryan Creek floodplain in the Survey Area.	Potential disturbance, will be flagged for avoidance or re- location
Angelica lucida (sea- watch)	CRPR 4.2	Redwood Acres (RA- 20)	One occurrence within the upper bank just above the coastal salt marsh habitat along Ryan Slough.	No impact
Montia howellii (Howell's montia)	CRPR 2B.2	Henderson Gulch (HG-5) South McKay (SM-2/- 3)	One population with approximately 100 individuals and another with approximately 500 individuals on or adjacent to former timber roads. One smaller occurrence composed of approximately 5–10 individuals on a decommissioned timber road on a log used as an informal bridge crossing over a drainage.	Potential disturbance, will be flagged for avoidance or re- location

CRPR 2b.2: Rare, threatened, or endangered in California, but more common elsewhere; fairly threatened in California. CRPR of 4.2: Limited distribution, a watch list; fairly threatened in California

CRPR of 4.3: Limited distribution, a watch list; not very threatened in California

The 2019 and 2020 surveys identified the following vegetation cover types:

Table 5: Vegetation Cover Types Identified in 2019 and 2020 Surveys

Vegetation Cover Type	Status (Note 1)	Area (acres)
Sequoia sempervirens Forest Alliance	S3	539.0
Riparian forest (Acer macrophyllum and	S3/None (Note 2)	55.8
Alnus rubra Forest Alliances)		
Holcus lanatus–Anthoxanthum odoratum	None	3.2
Semi-natural Herbaceous Alliance		

#### Note 1:

S3 Vulnerable – Vulnerable in the state due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation.

None – Semi-natural alliances are nonnative stands and therefore have no state rank by CDFW.

#### Note 2:

Acer macrophyllum Forest Alliance has a state status of S3; Alnus rubra Forest Alliance does not have a state status.

Public Works will perform plant surveys for the unsurveyed areas (Table 6) prior to trail construction.

**Table 6: Future Plant Surveys** 

Trail Planning Unit	Segments	Timing	
Park Street	All	Prior to construction	
Henderson Gulch	All except HG-4, HB-5	Prior to construction	
Northridge	Bike Skills Park	Prior to construction	
Eggert Connector Trail	All	Prior to construction	

#### Wetlands

In 2018, Pacific Coast Fish, Wildlife and Wetlands Restoration Association (PCFWWRA) performed a limited field investigation to survey previously unmapped wetlands within the Phase 1 portion of the Community Forest. The intent of this work was to identify wetlands areas that were unmapped on the National Wetland Inventory (NWI) maps maintained by the U.S. Fish & Wildlife Service. The NWI maps identified a total of 73 acres of wetlands within the Community Forest; however, this data set only covered the northern portion of the property. PCFWWRA mapped wetlands within the remainder of the Phase 1 property using a combination of aerial photograph interpretation and ground-truthing.

Within the survey area, PCFWWRA mapped a total of 43.14 acres of wetlands. The majority of these wetlands were freshwater forested wetlands (43.0 acres) associated with the Ryan Creek and its tributaries. The freshwater forested wetlands found bordering Ryan Creek and its tributaries are classified as Palustrine Forested, Broad-leaved Deciduous, Seasonally Flooded wetlands (PFO1c). These wetlands were characterized by the presence of wetland plants that are adapted to the wet soil conditions created by periodic flooding during the rainy season. The forested wetlands are transitional between aquatic channel habitats and upland forest habitats. The wetland boundary was mapped where there was a shift in dominance from hydrophytic to nonhydrophytic plant species. The boundary was often associated with a change in topography. In addition, a small freshwater emergent wetland (0.14 acre) was mapped in the southeast region of the study area. This wetland was associated with a sediment reduction project performed in 2013.

While PCFWWRA focused their assessment on mapping naturally occurring wetlands, they also observed areas of wetland vegetation that have developed artificially as a result of altered drainage patterns resulting from historical road building and timber operations. PCFWWRA noted that as sediment reduction and habitat restoration work continues, many of these artificially wet areas would be re-contoured to support natural drainage patterns. Restoration of natural hydrology would enhance natural wetland functions in the landscape while the total area would likely be reduced.

#### Northern Spotted Owl

Northern Spotted Owls (*Strix occidentalis caurina*) are listed as Threatened under the federal Endangered Species Act and California Endangered Species Act. Threats to Northern Spotted Owls include habitat impacts associated with wildfire and timber harvest and displacement by barred owls (*Strix varia*). The County has conducted annual surveys for Northern Spotted Owls since 2015 in accordance with the procedures outlined in the revised 2011 U.S. Fish and Wildlife Service Northern Spotted Owl survey protocol (USFWS, 2012). The County retained Leopardo Wildlife Associates in 2015 and 2016, Natural Resources Management in 2017, 2018, and 2019; and S.E. McAlister in 2020 for Northern Spotted Owl surveys. All survey efforts were coordinated with Green Diamond.

A Northern Spotted Owl activity center is a mapped point within an area of nesting and roosting habitat with concentrated activity and detections. Activity centers are designated by California Department of Fish & Wildlife. The Community Forest contains one designated activity center on the property and several others have a portion of their ranges (0.7-mile radius) within the Community Forest boundary.

In 2020, S.E. McAlister performed a total of six site visits in and around the Community Forest, which yielded no positive detections of Northern Spotted Owls, four detections of barred owls, and one detection of an unidentified *Strix* owl. Certain *Strix* owl vocalizations are not diagnostic and are recorded as "unknown *Strix*" unless a visual observation is made or a diagnostic call is also heard. Green Diamond detected NSOs on three occasions within the Ryan Creek stream corridor along the east boundary of the Community Forest. CDFW will make an official determination to associate these Northern Spotted Owl detections with an activity center.

In addition to publishing the Northern Spotted Owl survey protocol, the U.S. Fish & Wildlife Service publishes guidelines for measures to avoid incidental take of Northern Spotted Owls during timber operations, including the Northern Spotted Owl Take Avoidance Analysis and Guidance for Private Lands in California within the coastal redwood region, also known as Attachment A (USFWS, 2019). Although Attachment A applies to timber operations and not for trail development, Attachment A is used as reference to develop appropriate mitigation measures.

#### **Aquatic Habitat**

The following background information is provided in PWA (2019):

"Ryan Creek is located in the Eureka Plain HU [Hydrologic Unit] and is a significant tributary to Freshwater Slough and Humboldt Bay. Three listed salmonid species utilize Ryan Creek and its tributaries. Humboldt Bay and its tributaries have been identified as critical habitat for coho salmon, maintaining some of the healthier populations within the state. The Ryan Creek watershed is 14.7 sq. miles and contains approximately 14 miles of anadromous habitat. It has been shown that Ryan Creek is extensively utilized by juvenile coho salmon, many of them migrating out of the Freshwater Creek system to take advantage of Ryan Creek's velocity and water quality refugia and feeding opportunities during high flow events in the winter, as well as to over-summer in Ryan Creek's cool water pools.

"The Ryan Creek watershed is typical of other sub-watersheds in the Humboldt Bay region where cumulative impacts caused by historic timber production and ranching activities have resulted in the loss of channel complexity and fish habitat. The extensive road and skid trail network has disconnected large areas of floodplain from the mainstem and ranching activities in the downstream end of the watershed further impacted the stream system by the construction of an extensive dike and levee system and grading activities that filled in side channels and leveled the floodplain. This has significantly reduced the habitat available for coho salmon and increased stress on a population that is already stressed by a number of other local and regional factors."

The lower approximately one-half mile of Ryan Creek is tidally influenced. Juvenile salmonids move between the stream-estuary ecotones of Freshwater Creek, Wood Creek, and Ryan Creek for summer and winter rearing (CDFW, 2018). Portions of Henderson Gulch, Bob Hill Gulch, and unnamed tributaries within the Community Forest are accessible to salmonids.

#### Migratory Birds and Raptors

The Community Forest provides habitat for migratory birds and a number of raptors. Nesting by osprey at the top of redwood snags or dead-topped trees is possible from February 15 through August 15. Nesting by peregrine falcon is unlikely, but possible, from January 15 through August 15.

#### Marbled Murrelet

Marbled murrelets are listed as threatened under the federal Endangered Species Act and endangered under the California Endangered Species Act. Murrelets are sea birds that fly inland for nesting. Along the North Coast of California, murrelets are primarily restricted to nesting within large stands of old-growth redwood forest. Because the Community Forest is composed of second- and third-growth, the Community Forest does not contain suitable nesting habitat for marbled murrelets.

#### Amphibians and Reptiles

Stream amphibians such as northern red-legged frog (*Rana aurora*), coastal tailed frog (*Ascaphus truei*), and southern torrent salamander (*Rhyacotriton variegatus*) may be present within aquatic habitats of the Community Forest. Northern red-legged frogs are likely present, while tailed frog and southern torrent salamander are unlikely but possible. Del Norte salamander is primarily restricted to talus habitats and is not expected to be present. The presence of western pond turtles is unlikely but possible.

#### **Humboldt Marten**

The coastal Distinct Population Segment of the Pacific marten (*Martes caurina*), also known as Humboldt marten, was listed as threatened under the federal Endangered Species Act effective November 9, 2020 (Federal Register 63806-63831). The Humboldt marten is a medium-sized carnivore in the mustelid family that occurs in coastal Oregon and coastal northern California in older forest stands or forests that have old-forest characteristics. Currently the Humboldt marten exists in four small populations, including the Northern Coastal California Extant Population Area. According to Figure 20 in USDA (2019), the Humboldt marten has not been detected near the Community Forest. As shown in Figure 23 of USDA (2019), the Northern Coastal California Extant Population Area spans portions of the Smith River and Klamath River watersheds within Del Norte, northern Humboldt, and western Siskiyou counties.

# IV. (a) - Less than significant with mitigation incorporated:

The Community Forest is known to contain habitat for rare plants, Northern Spotted Owl, migratory birds and raptors, amphibians, and salmonids. The project involves very little in-channel work (small areas of bank stabilization at one or two bridge crossings) and limited trail development within riparian areas. The trails within riparian areas will primarily utilize existing road corridors with reduced footprints. Portions of the roads within riparian areas will be decommissioned or re-graded for improved drainage and reduced erosion.

Five mitigation measures (BIO-1, BIO-2, BIO-3, BIO-4, BIO-5), listed below, have been developed to ensure that the project will not have a substantially adverse effect on rare plants, Northern Spotted Owl, native migratory birds, osprey and peregrine falcon, and riparian areas.

# IV. (b) - Less than significant with mitigation incorporated:

One mitigation measure (BIO-5), listed below, has been developed to ensure that the project will not have a substantially adverse effect on riparian habitat.

#### IV. (c) - Less than significant with mitigation incorporated:

One mitigation measure (BIO-6), listed below, has been developed to ensure that the project will not have a substantially adverse effect on wetlands.

#### IV. (d) – Less than significant impact:

The proposed project will not substantially alter the forest structure or the stream and riparian corridors within the Community Forest. Based on the inherent nature and limits of the project, impacts to movement of any native resident or migratory fish or wildlife species will be less than significant.

**IV. (e)** - Less than significant impact with mitigation incorporated: The Eureka Community Plan contains policies for streamside management areas, wetland and wetland buffer areas, and other sensitive and critical habitats. The six mitigation measures (BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6) listed below will collectively ensure that the project will not conflict with policies or ordinances protecting biological resources.

**IV. (f) - No Impact:** The project area is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Green Diamond's Habitat Conservation Plans apply only to Green Diamond property.

#### **MITIGATION MEASURES:**

The County of Humboldt will implement the following measures to ensure no significant impacts to biological resources:

## Mitigation Measure BIO-1 - Rare Plant Avoidance:

- A. Trail construction in the following trail units will be subject to rare plant avoidance measures:
  - Mid-McKay (MM-01), Northridge (BG-01), South McKay (SM-01) Occurrences of *Pleuropogon refractus* (nodding semaphore grass) will be flagged and either avoided or re-located.
  - Mid-McKay (MM-01, MM-02, and MM-03) Occurrences of *Chrysosplenium glechomifolium* (Pacific golden saxifrage) will be flagged and either avoided or re-located.
  - Henderson Gulch (HG-05), South McKay (SM-02/-03) Occurrences of *Montia howellii* (Howell's montia) will be flagged and either avoided or re-located.
  - **B.** Seasonally-appropriate surveys for rare plants within the Park Street trail planning unit, Henderson Gulch trail planning unit, Bike Skills Park, Eggert Connector Trail, and other unsurveyed trail segments will be performed within three years prior to construction.

Mitigation Measure BIO-2 - Northern Spotted Owl Protective Measures: Trail construction within Segment SM-07, SM-08, SM-13, SM-16, HG-03, HG-04, HG-05, and HG-06 will be subject to seasonal restrictions for protection of Northern Spotted Owls. Work with heavy equipment or chain saws will not occur between February 1 and July 10 within these trail segments, unless protocol surveys determine that Northern Spotted Owls are non-nesting, or that nesting has failed, or California Department of Fish & Wildlife authorizes deviation from this measure due to proposed noise minimizations or other site-specific factors. If additional activity centers are identified within the Community Forest, trail segments within a 0.25-mile (1,320 feet) radius will also be subject to seasonal heavy equipment and chain saw restrictions. Work activities using hand labor are not subject to seasonal restrictions.

**Mitigation Measure BIO-3 - Native Migratory Bird Nest Avoidance:** For trail construction work, Public Works will attempt to remove trees and other vegetation that could potentially contain nesting migratory birds outside the bird nesting season (March 15 to August 15). If vegetation removal occurs

outside the bird nesting season, no further mitigation is necessary. If vegetation removal occurs between March 15 and August 15, Public Works shall have a qualified wildlife biologist conduct preconstruction surveys within the vicinity of the impact area to check for nesting activity of native migratory birds. The biologist shall conduct a minimum of one preconstruction survey within the sevenday period prior to vegetation removal activities. If vegetation removal work lapses for seven days or longer during the nesting season, a qualified biologist shall conduct a supplemental avian survey before project work is reinitiated. If an active nest is found, the biologist will determine the extent of an appropriate construction-free buffer zone to be established around the nest and/or operational restrictions in consultation with the California Department of Fish and Wildlife. Buffer zones will be delineated with flagging and maintained until the nests have fledged or nesting activity has ceased. This measure does not apply to vegetation that does not contain potential bird nesting habitat.

Mitigation Measure BIO-4 - Osprey and Peregrine Falcon Protective Measures: Trail construction coordinators will be alert for potential osprey or peregrine falcon detections during the pertinent nesting seasons (February 15-August 15 for osprey; January 15-August 15 for peregrine falcon). If osprey or peregrine falcons are sighted or heard, then a qualified wildlife biologist will conduct a preconstruction survey to determine if a nesting location is nearby. No trail building will occur within 500 feet of an occupied osprey or peregrine falcon nest.

**Mitigation Measure BIO-5 - Riparian Vegetation Protective Measures:** Bridges will be located to minimize removal of riparian vegetation. Where removal of riparian vegetation is unavoidable, a new tree will be planted along the stream reach for each tree larger than four inches diameter at breast height removed. The planted trees will be of the same species as the removed trees.

**Mitigation Measure BIO-6 - Wetland Avoidance and Mitigation Measures:** For trail segments RA-08, RA-19, PS-01, NM-07, MM-01, SM-17, HG-04, and other segments with potential wetlands, Public Works will implement the following measures:

- A. Wetlands near proposed trail alignments will be delineated and flagged.
- B. The trail will be routed to avoid wetlands to the greatest extent practicable.
- C. If wetlands cannot be avoided, the amount of wetland impact will be quantified and wetlands will be created within the Community Forest at a 3:1 ratio by removing soil within existing upland areas and re-vegetating with native species.

**FINDINGS:** The Project would have **Less than Significant Impact** on Biological Resources **with Mitigation Incorporated**.

v.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?				
des	eshold of significance: Physical changes in known or ignated historical resources, or in their physical surroundings, manner that would degrade their significance.				

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		
<u>Threshold of significance</u> : Physical changes in archaeological sites that represent important or unique archaeological or historical information.		
c) Disturb any human remains, including those interred outside of formal cemeteries?	$\boxtimes$	
<u>Threshold of significance</u> : Disturbance of human burial sites as a result of project construction activities.		

The project area was traditionally occupied by the Wiyot people. Villages were typically located around the shores of the Humboldt Bay and near the mouths of rivers. The County does not have evidence of known cultural sites within the project area. See also Section XVIII (Tribal Cultural Resources).

Local historian Jerry Rohde prepared a historic profile of the McKay Tract (Rohde, 2014). The history of logging on the property extends back to the 1850s and spans the use of oxen, steam donkeys, tractor skidding, and modern methods. In the early period logs were transported to Eureka Slough and rafted through Humboldt Bay to mills along the Eureka waterfront, including the Occidental mill. Logs were conveyed by railroad to a log-dump on Eureka Slough from the 1880s to the 1930s. The parents of former Humboldt County Supervisor Roger Rodoni leased a house and ranch within the McKay Tract from 1940 to 1976. The ranch was converted back to forestland by planting spruce trees in the 1990s. The project area does not contain any buildings or structures that have the potential to be historical resource eligible for listing.

V. (a) and (b) - Less than significant impact with mitigation incorporated: There are no known or designated historical, tribal cultural, or unique archaeological resources within the project area. However, there is a small potential that the proposed project activities could inadvertently uncover archaeological materials that would need to be evaluated further to determine their significance. A mitigation measure (CULT-1) is incorporated as a precautionary measure to ensure appropriate response in the event of inadvertent discovery of cultural resources. With mitigation a less than significant impact would occur.

**V. (c) - Less than significant impact with mitigation incorporated:** The proposed project activities have the potential to inadvertently uncover human remains during construction. A mitigation measure (CULT-2) is incorporated as a precautionary measure to ensure appropriate response in the event of inadvertent discovery of cultural resources. With mitigation a less than significant impact would occur.

#### **MITIGATION MEASURES:**

Mitigation Measure CULT-1 - Inadvertent Discovery Protocol for Cultural Materials: If cultural materials (e.g., chipped or ground stone, historic debris, building foundations, or bone) are discovered during ground-disturbance activities, work within 20 meters (66 feet) of the discovery shall be stopped, per the requirements of CEQA (Title 14 CCR 15064.5 [f]). Work near the archaeological find(s) shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the materials and offered recommendations for further action. Any identified cultural resources will be recorded on DPR 523 historic resource recordation forms, from the Office of

Historic Preservation. If Native American archaeological remains are inadvertently encountered, the Tribal Historic Preservation Officers (THPOs) of the three recognized Wiyot-area tribes (Blue Lake Rancheria, Bear River Band of Rohnverville Rancheria, and Wiyot Tribe) will be immediately notified, permitted to observe the findings in the field, and afforded the opportunity to make recommendations for avoiding, minimizing, or mitigating impacts from the proposed development.

Mitigation Measure CULT-2 - Inadvertent Discovery Protocol for Human Remains: If human remains are discovered during project construction, work within 20 meters (66 feet) of the discovery location, and within any nearby area reasonably suspected to overlie human remains, will cease (Public Resources Code, Section 7050.5). The Humboldt County Coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws regarding the disposition of Native American burials, which fall within the jurisdiction of the California Native American Heritage Commission (NAHC) (Public Resources Code, Section 5097). In this case, the coroner will contact NAHC. The descendants or most likely descendants of the deceased will be contacted, and work will not resume until they have made a recommendation to the landowner or person responsible for excavation work with direction regarding appropriate means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.

**FINDINGS:** The Project would have **Less than Significant Impact** on Cultural Resources **with Mitigation Incorporated**.

VI. ENERGY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul> <li>Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</li> <li>Threshold of significance:</li> </ul>				$\boxtimes$
<ul> <li>b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</li> <li>Threshold of significance:</li> </ul>				

**DISCUSSION**: The project would create negligible demand for energy resources.

MITIGATION MEASURES: No mitigation required.

**FINDINGS:** The Project would have **No Impact** on Energy.

VII. GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.  Threshold of significance: Loss or damage to project elements as a direct result of fault movement along a fault identified on an				
Alquist-Priolo map.  ii) Strong seismic ground shaking?  Threshold of significance: Loss or damage to project elements as a result of seismically derived ground movement.				
iii) Seismic-related ground failure, including liquefaction?  Threshold of significance: Loss or damage to project elements as a result of seismically derived ground failure.				
<ul><li>iv) Landslides?</li><li><u>Threshold of significance</u>: Loss or damage to project elements due to landslides.</li></ul>				
b) Result in substantial soil erosion or the loss of topsoil?  Threshold of significance: Erosion by water or wind of more than a minimal volume of earth materials.			$\boxtimes$	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?  Threshold of significance: Secondary instability of earth materials, related to the project, that could subsequently fail, damaging				
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?  Threshold of significance: Location of the project on expansive soils that are identified by professional geologists, which could result in				
damage to project elements or other sites or structures.  e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?  Threshold of significance: Placement of a septic tank or alternative disposal system on soils not capable of supporting such systems.				

f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		
<u>Thre</u>	eshold of significance: Disturbance of a unique paleontological resource or site or unique geologic feature as a result of project construction activities.		

The North Coast is a seismically active area located near a triple junction of tectonic plates that increase the likelihood of regionally significant earthquakes. All construction projects are subject to the seismic safety standards in the California Building Code. The County's geologic hazards regulations are provided in Humboldt County Code, Title III (Land Use Development), Division 3 (Building Regulations), Chapter 6 (Geologic Hazards). Potential seismic hazards include surface fault rupture, liquefaction, and landsliding.

Much of the ground in the Ryan Creek watershed has been disturbed and altered by historical logging and road-building, and large rainfall events have triggered occurrences of mass wasting. Overall, the landscape is in a progressive state of recovery from historical disturbance. Potentially sensitive landscape features such as headwall swales, landslides, steep stream banks, and unstable fills are present. Further discussion regarding geology and geomorphology is provided in PWA (2019).

VII. (a)(i) - Less than significant impact: An Earthquake Fault Zone is a regulatory zone that encompasses traces of Holocene-active faults to address hazards associated with surface fault rupture (California Geological Survey, 2018). Surface fault rupture is the result of fault movement that breaks to the surface of the earth (either suddenly or slowly) and is the result of tectonic movement that originates at depth. Surface fault rupture poses a hazard because the displacement that occurs can severely damage buildings. The purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prevent the construction of structures for human occupancy across traces of active faults. The project area is not situated within an Earthquake Fault Zone (https://maps.conservation.ca.gov/cgs/EQZApp/app/) and does not involve the construction of occupied structures.

VII. (a)(ii) - Less than significant impact: The project area is located in a region of high seismicity and will likely be subjected to high levels of seismically-induced shaking. The level of shaking at will depend on the earthquake magnitude and the distance to the source. There is a high probability the project site will experience shaking associated with a seismic event of magnitude seven or greater during its lifetime. The project area does not have unique characteristics or hazards that would elevate the risk of strong seismic ground shaking.

VII. (a) (iii) - No impact: Liquefaction involves a sudden loss in strength of a water-saturated soil and results in temporary transformation of the soil into a fluid mass. Recent alluvial floodplain soils and coastal sand deposits exhibit the highest liquefaction hazard (Humboldt County, 2018 – Safety Element). Portions of the project area, primarily along stream corridors, are situated within mapped liquefaction hazard zones (Humboldt County, 2015). Liquefaction is primarily a concern for structures with deep foundations such as large buildings and bridges. Because the trail bridges will be built on small concrete slabs placed on the ground surface, the project would have no impact on liquefaction-related hazards.

VII. (a) (iv) – Less than significant impact: Hazards related to slope instability and landslides are generally associated with mountain terrain, bluffs, and steep riverbanks. The proposed trail alignments have been developed to avoid steep and unstable areas where possible. Trail building will involve only

minor grading within a narrow corridor. For these reasons the potential for a landslide as a result of project activities or the completed project is considered low.

- VII. (b) Less than significant impact: The project involves limited grading and will utilize sediment and erosion control best management practices during construction. The disturbed soil areas will be covered with duff and vegetation materials following the completion of trail-building. Soil erosion or loss of topsoil will be minimal.
- VII. (c) Less than significant impact: The proposed trail alignments have been developed to avoid steep and unstable areas where possible. In steep or potentially unstable areas, trail-building will include stabilization measures (e.g., log crib walls) and a variety of measures to provide sustainable drainage and limited erosion. Due to these considerations, there is low potential for instability to result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- **VII.** (d) No impact: Expansive soils are those soils with significant clay content that expand when wet and shrink when dry. Soils with a high content of expansive minerals can form deep cracks in drier seasons, which can be detrimental to foundations and other structural members. The predominant soil types within the project areas are not expansive soils.
- **VII. (e) No impact:** The project does not involve placement of septic tanks or alternative disposal systems.
- VII. (f) No impact: Based on the geological setting, there is no potential for paleontological resources to be present. In addition, unique geologic features are not present.

MITIGATION MEASURES: No mitigation required.

**FINDINGS:** The Project would have a **Less Than Significant impact** on Geology and Soils.

VIII. GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions (GHG), either directly or indirectly, that may have a significant impact on the environment?				
<u>Threshold of significance</u> : For land use development projects, the threshold is annual emissions less than 1,100 metric tons per year (MT/yr) of carbon dioxide equivalent (CO <sub>2</sub> e). For stationary-source projects, the threshold is 10,000 metric tons per year (MT/yr) of CO <sub>2</sub> e.				
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG?				$\boxtimes$
<u>Threshold of significance</u> : Substantial conflict with a goal, standard, or implementation measure of an applicable plan, policy, or regulation for GHG reduction.				

Section 15064.4 of the CEQA guidelines specifies how the significance of impacts from greenhouse gas (GHG) emissions is to be determined. The Lead Agency is to make a good faith effort to describe, calculate, or estimate the amount of GHG emissions that will result from a project. The Lead Agency is also to consider the following factors when accessing the impacts of the GHG emissions on the environment:

- 1. Extent to which the project may increase or reduce GHG emissions, relative to the existing environmental setting
- 2. Whether the project emissions exceed a threshold of significance that the Lead Agency determines applies to the project
- 3. Extent to which the project complies with regulations adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions

Global climate change is a process whereby GHGs accumulating in the atmosphere contribute to an increase in the temperature of the earth's atmosphere. The primary GHGs contributing to global climate change are carbon dioxide, methane, nitrous oxide, and fluorinated compounds. These gases allow visible and ultraviolet light from the sun to pass through the atmosphere but prevent heat from escaping back out into space. Among the potential consequences of global climate change are rising sea levels and adverse impacts to water supply, water quality, agriculture, forestry, and ecosystems. In addition, global climate change may increase electricity demand for cooling, decrease the availability of hydroelectric power, and affect regional air quality and public health.

In California, the largest emitter of GHGs is the transportation sector, followed by electricity generation. Carbon dioxide, methane, and nitrous oxide emissions are byproducts of fossil fuel combustion. GHG emissions are typically reported as carbon dioxide equivalents ( $CO_2e$ ) to account for the fact that different GHGs have different potentials to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. Expressing emissions in  $CO_2e$  takes the contributions of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only carbon dioxide was being emitted (BAAQMD, 2017). Thresholds of significance for GHG emissions were adopted for the project based on BAAQMD (2017).

VIII. (a) and (b) - No impact: Project construction activities could result in a negligible increase in GHG emissions, including exhaust emissions from on-road trucks, worker commute vehicles, and off-road heavy-duty equipment (assuming these vehicles and equipment would not otherwise be operating). Operation of the facility will generate minimal vehicle trips and a negligible increase in GHG emissions.

Based on the negligible percentage of construction- and operation-related GHG emissions, and the substantial net overall reduction in GHG emissions represented by the project, it can be firmly concluded that the project would not have a significant impact through GHG generation, and that the project will not conflict with an applicable plan, policy or regulation for GHG reduction.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The Project would have **No Impact** on Greenhouse Gas Emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul> <li>a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</li> <li>Threshold of significance: Potential storage or use of chemicals, on a regular basis, that could be hazardous if released into the environment.</li> </ul>				$\boxtimes$
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?  Threshold of significance: Construction conditions that would be likely to result in the generation and release of hazardous materials.				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?  Threshold of significance: Use of hazardous materials within a quarter-mile of an existing or proposed school.				
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?  Threshold of significance: Siting of a project on a listed hazardous materials site, as defined by Government Code Section 65962.5.				×
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?  Threshold of significance: Increase in use intensity by people within the boundaries of, or within two miles of, the Airport				$\boxtimes$
Planning Area for a public airport.  f) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?  Threshold of significance: Physical change in the environment that would interfere with emergency responses or evacuations.				$\boxtimes$

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?		$\boxtimes$	
<u>Threshold of significance</u> : Increased exposure of people or structures to significant risk of life involving wildland fires.			

The Phase I and Phase II properties of the Community Forest were evaluated to identify the potential presence of environmental contamination (SHN, 2013; Amicus, 2020). Neither study found evidence of hazardous substances or petroleum products that would constitute a potential environmental impairment on the soil or groundwater associated with the properties.

**IX.** (a) and (b) – No impact: Vehicles and equipment associated with construction activities would contain fuels and lubricants. These materials are commonly used during construction, would be used in small quantities, and are not acutely hazardous. Numerous laws and regulations ensure the safe transportation, use, storage, and disposal of hazardous materials. For example, Caltrans and the California Highway Patrol regulate the transportation of hazardous materials and wastes, including container types and packaging requirements, as well as licensing and training for truck operators, chemical handlers, and hazardous waste haulers.

Worker safety regulations cover hazards related to the prevention of exposure to hazardous materials and a release to the environment from hazardous materials use. The California Division of Occupational Safety and Health (Cal-OSHA) also enforces hazard communication program regulations, which contain worker safety training and hazard information requirements, such as procedures for identifying and labeling hazardous substances, communicating hazard information related to hazardous substances and their handling, and preparation of health and safety plans to protect workers and employees.

- **IX. (c) No impact:** The project will not emit hazardous emissions, handle hazardous or acutely hazardous materials, substances, or waste.
- **IX. (d) No impact:** The project is not located on a site included on a list compiled pursuant to Government Code Section 65962.5.
- **IX. (e) No impact:** A small portion of the Park Street trail planning unit is situated within Safety Zone 6 of the Murray Field airport land use compatibility plan. Development of a trail in this area does not represent any safety hazard or noise concerns.
- **IX. (f) No impact:** No physical change to the environment will occur as a result of this project that would interfere with emergency responses or evacuations. Public Works will work with Humboldt Bay Fire to develop maps depicting emergency access routes within the Community Forest.
- **IX. (g) Less than significant impact:** The Community Forest is situated within a "High" fire hazard severity zone (see Section XX for further discussion on wildfire risk). People are present within the Community Forest under current conditions and there have been incidents of fires associated with malicious mischief or unauthorized camping. It's difficult to accurately predict whether these types of incidents would increase or decrease with an increased presence of people. More people increase the potential for ignition sources, but also provide more deterrence and/or opportunities for timely

reporting. The road and trail network will be improved which will enhance both emergency response into the forest and evacuation out of the forest. Based on these considerations, the project will not substantially change the exposure of people or structures to impacts from wildland fires. Separate from the Trail Plan, the County's Forest Stewardship Plan will evaluate the need for fuels reduction at the Community Forest's urban interface.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The Project would have **No Impact** on Hazards and Hazardous Materials.

х.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
poll Disc Disc	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?  eshold of significance: Discharge of sediment or other lutants that would violate Basin plan standards or Waste charge Requirements associated with National Pollution charge Elimination System Permit (NPDES) permits.				
	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? <u>eshold of significance</u> : Change in groundwater levels or rage that would affect potential uses of groundwater.				$\boxtimes$
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:  i) result in substantial erosion or siltation on- or off-site;  ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;  iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or  iv) impede or re-direct flood flows?  eshold of significance: Erosion due to concentrated runoff in the project site.				
d) Thr	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? <u>eshold of significance</u> : Storage of hazardous materials using tems that are vulnerable to flood, tsunami, or seiche.				

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?		
<u>Threshold of significance</u> : Potential for release of pollutants in violation of a water quality control plan or sustainable groundwater management plan.		

#### Freshwater Creek Sediment TMDL

The project is located within the Ryan Creek watershed which drains to Freshwater Slough; hence Ryan Creek is considered a sub-watershed of the Freshwater Creek watershed, which is larger. The Freshwater Creek watershed is listed on the Clean Water Section 303(d) list as a sediment impaired watershed by the North Coast Regional Water Quality Control Board (Regional Water Board) and U.S. Environmental Protection Agency. The following information was obtained from the Regional Water Board website (accessed November 10, 2020)

(https://www.waterboards.ca.gov/northcoast/water\_issues/programs/tmdls/freshwater\_creek/):

"A program has been developed to recover 303(d) List waterbodies via the establishment of Total Maximum Daily Loads (TMDL). At this time, the Regional Water Board staff is in the process of establishing a TMDL for sediment in the Freshwater Creek watershed. The goal of the TMDL program is to restore and maintain the sediment impaired beneficial uses of water of Freshwater Creek and its tributaries. Staff will develop the technical TMDL, the implementation, and monitoring plans together.

"Staff has been working with the landowners in the watershed to compile existing information about watershed conditions as well as working with the primary landowners to conduct studies to fill information gaps. As part of that process, the Regional Board contracted with the Redwood Community Action Agency to conduct interviews of watershed residents.

"As documents associated with the development of the Freshwater Creek TMDL become available, they will be posted at this location. Additionally, staff will conduct public meetings to provide an overview of the documents and provide an opportunity for the public to comment and have their questions, concerns, and suggestions considered prior to the whole document going out for public review."

The sediment TMDL for the Freshwater Creek watershed is not expected for several years.

### **Logging Road Assessment**

The County retained Pacific Watershed Associates (PWA) to evaluate the condition of the road network and identify sites and areas that have the potential to deliver sediment to waterways and impact water quality (PWA, 2014). Through other work in the Ryan Creek watershed, PWA assessed the roads within the Phase 2 property, and thus the County has a complete inventory of controllable sediment discharge sites associated with historical logging roads within the Community Forest. The NTMP currently in development will contain a detailed plan to address controllable sediment discharge sites.

# Effects of the Trail Plan

The Trail Plan will reduce trail-related impacts in the following ways:

- The Trail Plan will help minimize erosion and water quality impacts by designating the formal trail network that will be constructed to minimum standards using specified design measures.
- Logging roads have been integrated into the trail network to minimize ground disturbance.
- In some situations (e.g., R-4, R-6), a historic logging road will not be retained because less-impactful alternatives have been identified, but the road prism will be converted to a multi-use trail. This conversion reduces the footprint of an existing linear feature while avoiding the need for creating a trail on undisturbed ground.
- Many existing informal trails are situated in wet areas or on steep slopes with poor drainage.
   The alignments in the Trail Plan were developed to avoid wet areas, steep slopes, and unstable surfaces to the greatest extent possible. Several informal trails in poor locations will be decommissioned as the formal trails are constructed.
- As described in Section 2, the Trail Plan specifies a suite of design measures to manage people and drainage to promote sustainable trails.
- Trails will be laid out to avoid short-cutting, which could lead to excessive erosion.
- Opening the Community Forest for sanctioned public access will greatly reduce, if not eliminate, unauthorized use by motorcycles which are a significant source of erosion.

# Sediment Best Management Practices and Stormwater Pollution Prevention Plan

Trail construction practices will utilize Best Management Practices (BMPs) to avoid or minimize the potential for erosion and sediment delivery. BMPs include the following:

- Locate trails outside wet areas to the greatest extent possible.
- Use the "full-bench" design approach where feasible to minimize the import of fill material and creation of steepened slopes.
- Apply imported aggregate on trail surfaces in wet areas.
- Design trails to be out-sloped where feasible for dispersed drainage. Use reverse grades at sharp turns to avoid concentrated drainage.
- Preserve the duff that is removed to create the trail bed and apply this material along the edges of the trail as a natural erosion control material.
- Compact and/or protect loose soil.

The BMPs will be incorporated into a Stormwater Pollution Prevention Plan (SWPPP).

#### **Construction General Permit**

Public Works is consulting with the Regional Water Board to determine whether the project would require coverage under the State Water Resources Control Board's General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) (Order 2009-0009-DWQ amended by 2010-0014-DWQ & 2012-0006-DWQ). If required, Public Works will apply for Construction General Permit coverage. A SWPPP will be prepared regardless of whether Construction General Permit coverage is required.

X. (a), (c), (e) - Less than significant with mitigation incorporated: Construction activities necessary to construct the project would be conducted in accordance with a SWPPP. Implementation of BMPs and erosion control measures as identified in the SWPPP would reduce potential water quality impacts during project construction activities by requiring measures to control erosion and sedimentation of

receiving water bodies. In addition, the County will limit the use of heavy equipment for trail construction to the months from April through October to avoid the wet season. Finally, the County will apply aggregate rock (crusher fines or other appropriate material) to multi-use trails and multi-use roads within streamside areas to reduce erosion and sediment delivery. Together, these three mitigation measures will ensure that the potential impact on water quality during construction and operation would be less than significant.

- **X. (b) No impact:** The project does not include any groundwater withdrawals.
- **X. (d) No impact:** The project does not include potential sources of pollutants that could be affected by flood tsunami, or seiche.

**FINDINGS:** The Project would have a **Less Than Significant Impact** on Hydrology and Water Quality **with Mitigation Incorporated**.

#### **MITIGATION MEASURES:**

Mitigation Measure HYD-1: Stormwater Pollution Prevention Plan and Construction General Permit: Construction practices will utilize BMPs identified in a SWPPP to avoid or minimize the potential for erosion and sediment delivery. If required, coverage under the State's Construction General Permit will be obtained.

**Mitigation Measure HYD-2: Limited Equipment Work Period:** Trail construction work using heavy equipment will be limited to the period from April 1 through October 31 to avoid the wet season.

Mitigation Measure HYD-3: Aggregate for Multi-use Trails and Multi-use Roads within Streamside Areas: Aggregate rock (crusher fines or other appropriate material) will be applied to multi-use trails and multi-use roads within streamside areas to reduce erosion and sediment delivery. This measure applies to portions of the following trail segments: RA-20, RA-19, RA-07, RA-08, RA-09, NM-06, NM-07, MM-01, SM-17, SM-01, SM-02.

XI. LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Physically divide an established community?  Threshold of significance: Placement of a new structure that results in a perception that the project will physically divide a existing community for a duration greater than the constructiperiod.				$\boxtimes$
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for purpose of avoiding or mitigating an environmental effect Threshold of significance: Project-related effects to environmental resources in violation of protective policies adopted in the County's General Plan, or other planning documents.	the			

# **General Plan Consistency**

On November 7, 2013, the Planning and Building Department provided a report to the Planning Commission pursuant to Government Code 65402 regarding the conformance of the proposed Phase 1 property acquisition with the General Plan. The Planning Commission adopted the report which concluded that the proposed acquisition to establish a community forest conforms to the Humboldt County Framework General Plan, Eureka Community Plan, Freshwater Community Plan, and Humboldt Bay Area Plan. The report recommended that standards for trail development in the General Plan should be applied in planning for future access points and trail and support facilities. On February 20, 2020, the Planning and Building Department provided a report to the Planning Commission pursuant to Government Code 65402 regarding the conformance of the proposed Phase 2 property acquisition with the General Plan. The Planning Commission adopted the report which concluded that the proposed property acquisition is consistent with the 1995 Eureka Community Plan, 2017 Humboldt County General Plan, and 2019 Housing Element.

## Zoning Outside the Coastal Zone

The majority of the project is situated outside the coastal zone. Outside the coastal zone, the proposed project is considered a "public use" as defined at Humboldt County Code Section 314-58.1. Public uses are permitted in any zone without the need for obtaining a conditional use permit (Humboldt County Code Section 314-58.1).

# **Zoning Inside Coastal Zone**

The northern portion of the project is situated inside the coastal zone. The Park Street trail planning unit and portions of the Redwood Acres trail planning unit are situated within the jurisdiction of the Coastal Commission and subject to permitting requirements under the Coastal Act. Other portions of the Redwood Acres trail planning until are situated within the jurisdiction of Humboldt County and subject to the requirements of Humboldt County Code, Title III, Division 1, Chapter 3.

# **Special Permit**

A Special Permit may be needed for work within streamside management areas unless that work is determined to be ministerial in consultation with California Department of Fish & Wildlife.

**XI (a) - No impact:** The project is situated on public property and does not have the potential to divide an established community.

XI (b) - Less than significant impact: Acquisition of the property to establish the Community Forest was previously determined to be consistent with the Humboldt County General Plan. For development within the state jurisdiction portion of the coastal zone (primarily the Park Street trail planning unit), Public Works will consult with the Coastal Commission regarding the potential need for a coastal development permit or *de minimis* waiver. For development within the local jurisdiction portion of the coastal zone (primarily the Redwood Acres trail planning unit), Public Works will apply for a coastal development permit from the Building and Planning Department. Following the adoption of this CEQA Initial Study, Public Works will consult with the Building and Planning Department and California Department of Fish and Wildlife to determine if a Special Permit is required for trail development within streamside management areas.

**MITIGATION MEASURES:** No mitigation required.

FINDINGS: The Project would have a Less Than Significant Impact on Land Use and Planning.

XII. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul> <li>a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</li> <li>Threshold of significance: A short-term or long-term decrease in the availability of rock, aggregate, or sand that would otherwise be available for construction or other consumptive uses.</li> </ul>				
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?  Threshold of significance: Change in land use that would result in the loss of availability of locally-important mineral resource recovery site.				

**XII (a) and (b) - No impact:** The Community Forest does not contain mineral resources that are of value to the region or state. The quantity of gravel required for the project is a negligible amount compared to the total gravel extracted in the region.

MITIGATION MEASURES: No mitigation required.

**FINDINGS:** The Project would have **No Impact** on Mineral Resources.

XIII. NOISE. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?  Threshold of significance: Generation of sound-pressure levels, or the presence of people within range of these levels that exceed				
the applicable noise ordinance.				
b) Generation of excessive ground borne vibration or ground borne noise levels?				
<u>Threshold of significance</u> : Ground vibrations that interfere with normal activities or cause a nuisance condition, or damage, to adjacent properties.				

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?		
Threshold of significance: Increased noise levels arising from a public use airport as a result of the project, or the introduction (post-construction) of additional people into the vicinity of either of these airports where they will be exposed to sound levels that are not compatible with the County's noise ordinance.		

Ambient (background) noise levels within the project area are affected by the persistent sound of traffic and other sources of urban noise. These noises diminish away from the urban interface. Noise levels throughout the project area are affected by transient (short-term) events associated with amplified sounds and/or motor vehicle races at Redwood Acres, and also timber harvesting operations.

Some trail construction activities will result in short-term, minor noise events associated with heavy equipment. Most trail construction activities will involve hand-labor which produces minimal noise. Construction activities will occur during daylight hours.

The Northridge Access Point was positioned at the edge of a residential area to create separation from the nearest homes. Public Works intends to close the parking lot gate at night to prevent night-time use. The access points at Harris Street is situated on an arterial road with steady traffic and noise from events at Redwood Acres. Redwood Acres and Redwood Fields regularly host public events which generate background noise.

**XIII.** (a) - Less than significant impact: The noise generated by the project will be consistent with background noises. Humboldt County does not currently have ordinances that address construction noise. If noise from inappropriate public use becomes an issue for nearby residences, then Public Works will consider actions to curtail these activities.

**XIII.** (b) - Less than significant impact: Construction activities may occasionally require heavy equipment. Use of concrete saws or jackhammers would be rare, and only for sidewalk projects near access points. These activities will not generate ground borne vibrations that could damage a structure. The need for pile driving is not expected.

XIII. (c) - No impact: The project area is not located within the vicinity of a private airstrip.

MITIGATION MEASURES: No mitigation required.

FINDINGS: The Project would have Less than Significant Impact on Noise.

XIV. POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul> <li>a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and/or businesses) or indirectly (e.g., through extension of roads or other infrastructure)?</li> <li>Threshold of significance: Removal of an existing impediment to population growth due to an extension of an existing roadway</li> </ul>				
and improved traffic circulation in the project area.  b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?  Threshold of significance: Demolition or removal of five or more existing housing units as a result of the project.				

XIV (a) through (b) - No impact: The proposed project has no association with population or housing.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The Project would have a **No Impact** on Population and Housing.

XV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?				
Threshold of significance: Changes to an existing fire-protection				
system, or perceived need for such changes.				
b) Police protection?				$\square$
Threshold of significance: Changes to an existing law				
enforcement system, or perceived need for such changes.				
c) Schools?				$\square$
Threshold of significance: Changes in existing school enrollments,				
or the uses of schools, or perceived need for such changes.				
d) Parks?				
Threshold of significance: Changes to an existing park, resulting				
in less use, or a need for significant repairs to park facilities, or				
replacement parks.				

e) Other public facilities?		$\boxtimes$
Threshold of significance: Changes to other public facilities that		
are not directly a part of the County's roadway or storm water		
conveyance system.		

XV (a) through (e) - No impact: The proposed project in and of itself would not impact public services.

MITIGATION MEASURES: No mitigation required.

FINDINGS: The Project would have No Impact on Public Services.

XVI. RECREATION. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
<u>Threshold of significance</u> : Increased demand for recreational facilities or increased use of existing recreational areas such that those areas are physically degraded.				
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				
Threshold of significance: Increased demand for recreation facilities or increased use of existing recreational areas in a manner that would lead to an adverse change in the environment, such as degradation through over-use of environmentally sensitive areas.				

# **DISCUSSION**:

The project will help the Humboldt Bay region accommodate the increasing demand for outdoor recreation activities and alleviate the intensity of use on existing trail systems.

**XVI (a) and (b) - No impact:** The project will have a positive, rather than adverse, impact on existing recreational facilities.

MITIGATION MEASURES: No mitigation required.

**FINDINGS:** The Project would have **No Impact** on Recreation.

XVII. TRANSPORTATION. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				
<u>Threshold of significance</u> : Physical changes that would conflict with a program, plan, ordinance or policy addressing multi-modal transportation, complete streets, and other topics related to reducing vehicle miles traveled.				
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3,subdivision (b)?				
<u>Threshold of significance</u> : Physical changes that would generate a substantial increase in vehicle miles traveled.				
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
Threshold of significance: Introduction of a project element that would result in increased hazards due to design features, particularly a dangerous intersection.				
d) Result in inadequate emergency access?				
<u>Threshold of significance</u> : Project-related traffic restrictions that would prevent emergency vehicles from reaching necessary locations.				

# Overview

People will travel to the Community Forest utilizing private vehicles and public transit as well as on bicycle or by foot. One of the guiding principles of the Trail Plan (Section 2.6) is to promote connectivity by establishing multiple access points to disperse usage and provide a variety of options for entering the Community Forest. Providing access points is a challenge because much of the Community Forest is separated from public roads by private property. The four access points included within the project for this Initial Study include the Northridge Access Point, Harris Street Access Point, Redwood Acres, and Redwood Fields/North McKay Ranch Subdivision.

In 2018, a left-turn lane was constructed for the southbound lane of Walnut Drive to ensure that visitors traveling to the Northridge Access Point from the Cutten area would not impede traffic flow.

A transit stop is situated approximately 750 feet to the east of the Harris Street Access Point, on the north side of Harris Street. The County intends to provide bike racks at the Northridge and Harris Street Access Points, and other access points as warranted. Thus, visitors to the Community Forest will have the option of traveling without a passenger vehicle.

The project may result in a small increase in vehicle miles traveled by generating new trips for people traveling by vehicle to the Community Forest. However, the project will also reduce vehicle miles traveled by offsetting the need for longer trips to similar, more distant destinations.

#### **Circulation Plans**

Plans addressing the circulation system include:

- Humboldt Regional Transportation Plan Variety in Rural Options of Mobility (HCAOG, 2017).
- Humboldt County General Plan, Circulation Element (Humboldt County, 2017).
- Humboldt Bay Area Plan (Humboldt County, 2014).
- Eureka Community Plan (Humboldt County, 1995).

The Community Forest will be used primarily for non-motorized recreational purposes and incidentally for transportation. When acquisition of the Phase I property was being considered, the Project Report (Humboldt County, 2014) described how traffic circulation between Cutten and southern Eureka has been a priority for improvement. The Eureka Community Plan (1995) envisioned a connector road between Walnut Drive and Harrison Street passing west of the McKay Tract. The Circulation Element in the Humboldt County General Plan (2017) envisions a connector road between Walnut Drive and Harris Street. The boundaries of the property that was acquired to establish the Community Forest were adjusted to ensure that a new connector road between Cutten and Harris Street would not be precluded. Existing logging roads along the most likely alignment can be considered for a future public road alignment, if determined to be feasible and in the public interest.

**XVII. (a) - No impact:** Implementation of the Trail Plan will not conflict with the circulation policies in the plans listed above. The project will provide opportunities for non-motorized recreation and will not preclude the development of multi-modal networks.

**XVII.** (b) – Less than significant impact: The project will create a destination for recreational use by establishing access points and formally designated trails. The project area currently receives significant recreational use on informal trails. The project may result in an increase in vehicle trips generated, but that increase will be partially offset by reducing the need for longer distance trips. Inclusion of bike racks and the proximity of a transit stop less than a half-mile away will provide opportunities for utilizing active transportation to access the Community Forest. The project is not a residential, office, or retail development which have the greatest influence on vehicle miles traveled.

XVII. (c) - No impact: The project does not include substantial changes to public roads.

**XVII.** (d) - No impact: The proposed trail network was developed with consideration for providing access for emergency response to the extent possible. Upgraded logging roads will provide access for large and small vehicles. Some multi-use trails will provide access for light pick-ups and/or off-road vehicles (for official use only). Some trails will only be accessible by foot. Public Works will work with Humboldt Bay Fire to identify emergency access routes within the Community Forest.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The Project would have a **Less than Significant Impact** to Transportation/Traffic.

XVI	TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?				
b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?  In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				
cha	eshold of significance: Adverse alteration of those physical racteristics of a tribal cultural resource that are significant for eligibility in the national, state, or local register.				

On February 10, 2020, Humboldt County sent a letter to the Wiyot Tribe, Blue Lake Rancheria, and Bear River Band of the Rohnerville Rancheria pursuant to Public Resources Code § 21080.3.1 providing notification of the project and inquiring whether the tribes desired to request consultation regarding tribal cultural resources. On March 6, 2020, Humboldt County received an e-mail from Ted Hernandez, Wiyot Chairman and Cultural Director. Mr. Hernandez recommended adoption of an inadvertent discovery protocol. Mr. Hernandez also expressed the Wiyot Tribe's interest in participating in any advisory committee for the Forest Stewardship Plan. On March 9, 2020, Humboldt County received an e-mail from Janet Eidsness, Tribal Historic Preservation Officer for the Blue Lake Rancheria. Ms. Eidsness expressed support for the Wiyot Tribe participating in the development of the Forest Stewardship Plan. In previous communications with the Natural Resources Department of the Wiyot Tribe, staff expressed the Wiyot Tribe's interest in ethnobotanical gathering around the Humboldt Bay region and noted that coho salmon are a culturally important species (Adam Canter, personal communication). Mr. Canter expressed interest in opportunities for cultural interpretation such as signs and displays.

**XVIII.** (a) and (b) – Less than significant impact: The Community Forest is not considered a tribal cultural resource as defined under CEQA. The County intends to coordinate with the Wiyot Tribe in the context of the Forest Stewardship Plan for opportunities to share traditional ecological knowledge and inform forest management for culturally important species.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The Project would have **Less than Significant Impact** on Tribal Cultural Resources.

XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				
<u>Threshold of significance</u> : Discernible relationship between the effects of the proposed project and a direct need to upgrade or expand utilities and service systems.				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				
<u>Threshold of significance</u> : A demonstrated need for additional water supplies from the local water district.				
c) Result in a determination by the wastewater treatment provider, which serves the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				
<u>Threshold of significance</u> : An increase in hydraulic loading or waste-loading that exceeded the approved design features of the wastewater treatment facility.				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				
<u>Threshold of significance</u> : Discernible relationship between the effects of disposing solid waste generated by the project that would be in excess of the local landfill's permitted capacity.				
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				$\boxtimes$
<u>Threshold of significance</u> : Violation of any federal, state, and local statutes and regulations related to solid waste.				

**XIX.** (a) – Less than significant impact with mitigation incorporated: A proposed trail within the North McKay trail planning unit would cross over the water line leading to the residence on the inholding property within the Community Forest. Portions of the water line are aboveground or buried only to a shallow depth. Trail construction will need to avoid damaging the water line. To ensure that the trail does not impact the water line, Public Works will offer to replace a 40-foot segment of the water line in accordance with current plumbing standards prior to developing the trail in this area.

- **XIX. (b) No impact:** If a restroom is added at the Northridge Access Point in the future, the restroom would be connected to HCSD for water service. The additional water supply would be minimal.
- **XIX. (c) No impact:** If a restroom is added at the Northridge Access Point in future, the restroom would be connected to HCSD for wastewater service. The additional wastewater treatment demand would be minimal.
- **XIX.** (d), (e) No impact: Trail users will generate small amounts of waste during recreational use. Trash receptacles will be provided at the Northridge Access Point and other access points as warranted.

#### **MITIGATION MEASURES:**

The County will implement the following measure to ensure no significant impacts to a private water system:

**Mitigation Measure UTIL-1**: **Domestic Water Line Protection** - The County will offer to replace an approximately 40-feet segment of water line leading to the inholding residence in the North McKay trail planning unit where a trail (segment NM-04) is proposed to cross.

**FINDINGS:** The Project would have a **Less than Significant Impact** on Utilities and Service Systems **with Mitigation Incorporated**.

С	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
-	bstantially impair an adopted emergency response plan or nergency evacuation plan?				$\boxtimes$
would of emerge in an ad	old of significance: Potential for physical changes that create a conflict with the circulation system or an ency responder's capability to mobilize assets as described dopted emergency response plan or emergency tion plan.				
wil po	le to slope, prevailing winds, and other factors, exacerbate ldfire risks, and thereby expose project occupants to, illutant concentrations from a wildfire or the uncontrolled read of a wildfire?				
occupie	old of significance: Creation of a significant number of ed dwellings, or concentration of people, within a High or gh Fire Hazard Severity Zone.				
inf sou fire	quire the installation or maintenance of associated frastructure (such as roads, fuel breaks, emergency water urces, power lines or other utilities) that may exacerbate e risk or that may result in temporary or ongoing impacts the environment?				
	old of significance: Potential for development that would infrastructure specifically to address fire risk.				

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?		$\boxtimes$
Threshold of significance: Potential for physical changes that would expose occupied dwellings or other structures to hazardous post-fire conditions.		

The Humboldt County Community Wildfire Protection Plan (<a href="https://humboldtgov.org/2431/CWPP-2019">https://humboldtgov.org/2431/CWPP-2019</a>) contains the following description of wildfire hazard (Page 2-6):

"A location's fire-hazard ranking shows the expected behavior of fire in severe weather. Fire Hazard Severity Zones (FHSZs) are used by the State to assess and define fuel hazards, ranging from Moderate to High to Very High.... Generally, Humboldt County's coastal areas and river valleys with fog influence are rated Moderate, the western side of the county is rated High, and the eastern side of the county is rated Very High Fire Hazard Severity. Forty-five percent of Humboldt County is classified Very High, 48% high, and only 4% Moderate, the remainder being unclassified as unzoned or water, etc."

The Community Forest is situated in a High fire hazard severity zone within the State Responsibility Area (SRA), where Cal-FIRE has primary responsibility for wildfire protection services. The northern portion of the Community Forest is situated within the jurisdiction of Humboldt Bay Fire which provides all-risk fire protection services (structure fires, wildfires, medical emergencies, hazardous materials incidents, general disaster management, and other incidents). Humboldt Bay Fire will likely be first on scene in the event of a wildfire due to the proximity of their resources.

#### **DISCUSSION:**

- **XX.** (a) No impact: The Humboldt County Emergency Operations Plan (EOP) provides a framework for the Humboldt Operational Area agencies to respond to any emergency requiring multiagency participation and/or activation of the County Emergency Operations Center. The EOP primarily defines emergency management organization and procedures. Humboldt County does not have an adopted emergency evacuation plan. Implementation of the project will not impair the EOP.
- **XX.** (b) Less than significant impact: Development of access points and trails will not have a direct impact on wildfire risk. Implementation of the Trail Plan will result in an increased presence of people within the McKay Community Forest which could lead to an increase in ignition potential associated with smoking or unauthorized campfires. Conversely, the Community Forest will likely be more actively managed for wildfire risk compared to privately owned timberland. Establishment of trails will provide a potential starting point for creating fuel breaks; in some areas, their construction will reduce hazardous fuel loads in the understory that will be maintained over time. People within the Community Forest will be disbursed rather than concentrated. Development of the road and trail network will improve access for fire suppression and evacuation egress. Inclusion of signage and trail maps will assist with emergency evacuation in the event of a significant wildfire.
- **XX.** (c) Less than significant impact: The project will not require installation or maintenance of associated infrastructure that would exacerbate fire risk. The County will continue to facilitate access by

PG&E to maintain their utility corridors that pass through the Community Forest. As a separate project, the County will continue to develop a Forest Stewardship Plan for the Community Forest. The Forest Stewardship Plan will address the issue of wildfire risk and contain findings and recommendations to further assess and mitigate wildfire risk. Areas of dense forest with high fuel loading may be prioritized for thinning or fuel treatments and other mitigation measures may be pursued through implementation of the Forest Stewardship Plan. Maintenance of the trails themselves will be limited to trail surface maintenance, erosion control, vegetation management, and repairing short-cuts, none of which will result in an increase in wildfire risk beyond the impacts described in Section XX(b).

**XX.** (d) - No impact: Development of sustainable trails using the methods described in the Trail Plan will create trails more resilient to erosion following a wildfire. The project will have no effect on the exposure of people or structures to post-fire conditions.

MITIGATION MEASURES: No mitigation required.

**FINDINGS:** The Project would have a **Less than Significant Impact** to Wildfire.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?				
<u>Threshold of significance</u> : Significant if the proposed project reduced the habitat of a fish, plants, or wildlife species, or caused a fish or wildlife species to decline below a self-sustaining population size.				
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).				
Threshold of significance: Significant if the project, in combination with other recent, current, or foreseeable future projects, created a cumulatively considerable environmental effect for one or more of the environmental issue areas discussed in the checklist, even though the project itself did not.				

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?			
Threshold of significance: Significant if an element of the proposed project could be found to have a demonstrable opportunity of causing harm to individual human beings or groups.			

**XXI.** (a) – Less than significant impact: As documented in this Initial Study, the project would not substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory.

**XXI.** (b) - Less than significant impact: The project has been developed to integrate the road and trail system to minimize ground disturbance within the Community Forest. In addition, the project was developed to disperse access and use within the Community Forest to the extent feasible. Inherent to the concept of community forestry is the integration of public access, forest management, and resource conservation. Based on these considerations, the project would not have a cumulatively considerable impact on environmental resources.

**XXI.** (c) - No impact: No evidence for direct or indirect impacts with the potential to cause substantial adverse effects on human beings were identified.

**FINDINGS:** The Project would have a **Less than Significant Impact** on Mandatory Findings of Significance.

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# **ATTACHMENT A**

**Mitigation Monitoring and Reporting Program** 

# Appendix A Mitigation Monitoring and Reporting Program McKay Community Forest Trail Plan

Environmental Factor	Mitigation Measure	Implementation Responsibility	Timing
BIO-1	<ul> <li>Rare Plant Avoidance:</li> <li>A. Trail construction in the following trail units will be subject to rare plant avoidance measures: <ul> <li>Mid-McKay (MM-01), Northridge (BG-01), South McKay (SM-01) – Occurrences of Pleuropogon refractus (nodding semaphore grass) will be flagged and either avoided or relocated.</li> <li>Mid-McKay (MM-01, MM-02, and MM-03) – Occurrences of Chrysosplenium glechomifolium (Pacific golden saxifrage) will be flagged and either avoided or re-located.</li> <li>Henderson Gulch (HG-05), South McKay (SM-02/-03) – Occurrences of Montia howellii (Howell's montia) will be flagged and either avoided or re-located.</li> </ul> </li> <li>B. Seasonally-appropriate surveys for rare plants within the Park Street trail planning unit, Henderson Gulch trail planning unit, Bike Skills Park, Eggert Connector Trail, and other unsurveyed trail segments will be performed within three years prior to construction.</li> </ul>	Humboldt County Public Works	Part A: During trail construction  Part B: Prior to trail construction during appropriate blooming periods
BIO-2	Northern Spotted Owl Protective Measures: Trail construction within Segment SM-07, SM-08, SM-13, SM-16, HG-03, HG-04, HG-05, and HG-06 will be subject to seasonal restrictions for protection of Northern Spotted Owls. Work with heavy equipment or chain saws will not occur between February 1 and July 10 within these trail segments, unless protocol surveys determine that Northern Spotted Owls are non-nesting, or that nesting has failed, or California Department of Fish & Wildlife authorizes deviation from this measure due to proposed noise minimizations or other site-specific factors. If additional activity centers are identified within the Community Forest, trail segments within a 0.25-mile (1,320 feet) radius will also be subject to seasonal heavy equipment and chain saw restrictions. Work activities using hand labor are not subject to seasonal restrictions.	Humboldt County Public Works	February 1-July 10 (annually)
BIO-3	Native Migratory Bird Nest Avoidance: For trail construction work, Public Works will attempt to remove trees and other vegetation that could potentially contain nesting migratory birds outside the bird nesting season (March 15 to August 15). If vegetation removal occurs outside the bird nesting season, no further mitigation is necessary. If vegetation removal occurs between March 15 and August 15, Public Works shall have a qualified wildlife biologist conduct preconstruction surveys within the vicinity of the impact area to check for nesting activity of native migratory birds. The biologist shall conduct a minimum of one preconstruction survey within the seven-day period prior to vegetation removal activities. If vegetation removal work lapses for seven days or longer during the nesting season, a qualified biologist shall conduct a supplemental avian survey before project work is	Humboldt County Public Works	March 15-August 15 (annually)

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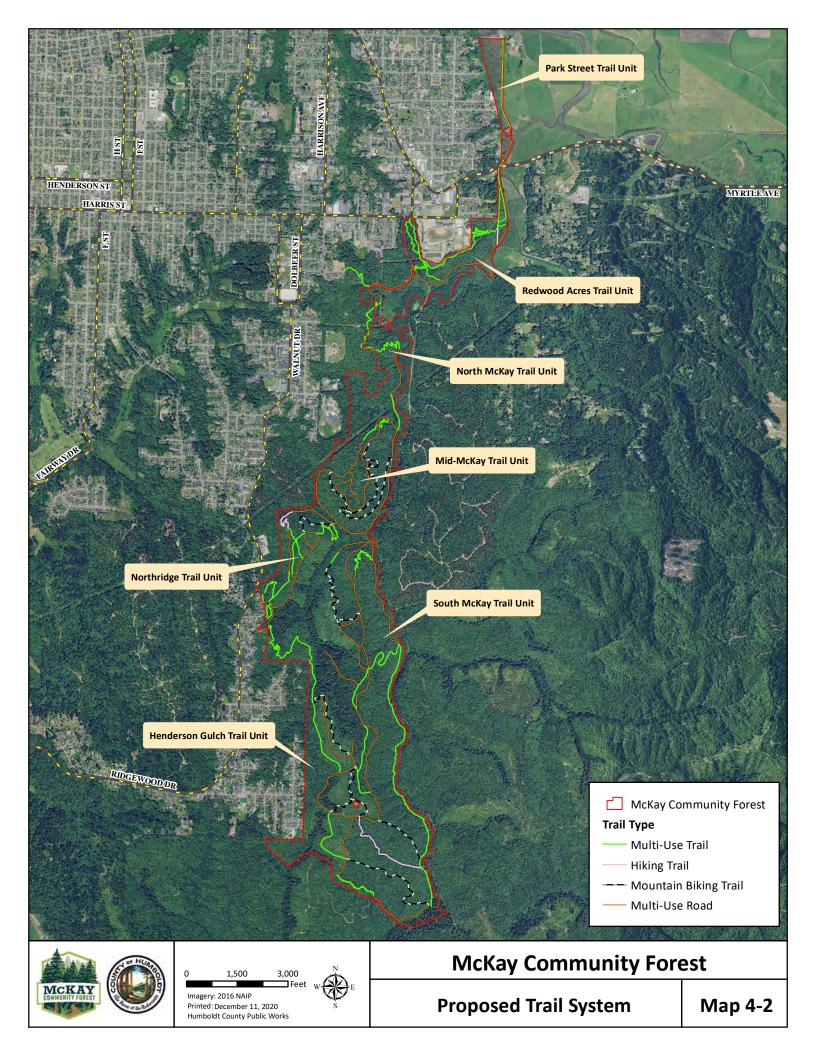
	reinitiated. If an active nest is found, the biologist will determine the extent of an appropriate construction-free buffer zone to be established around the nest and/or operational restrictions in consultation with the California Department of Fish and Wildlife. Buffer zones will be delineated with flagging and maintained until the nests have fledged or nesting activity has ceased. This measure does not apply to vegetation that does not contain potential bird nesting habitat.		
BIO-4	Osprey and Peregrine Falcon Protective Measures: Trail construction coordinators will be alert for potential osprey or peregrine falcon detections during the pertinent nesting seasons (February 15-August 15 for osprey; January 15-August 15 for peregrine falcon). If osprey or peregrine falcons are sighted or heard, then a qualified wildlife biologist will conduct a preconstruction survey to determine if a nesting location is nearby. No trail building will occur within 500 feet of an occupied osprey or peregrine falcon nest.	Humboldt County Public Works	January 15-August 15 (annually)
BIO-5	<b>Riparian Vegetation Protective Measures:</b> Bridges will be located to minimize removal of riparian vegetation. Where removal of riparian vegetation is unavoidable, a new tree will be planted along the stream reach for each tree larger than four inches diameter at breast height removed. The planted trees will be of the same species as the removed trees.	Humboldt County Public Works	Concurrent with bridge construction
BIO-6	<ul> <li>Wetland Avoidance and Mitigation Measures: For trail segments RA-08, RA-19, PS-01, NM-07, MM-01, SM-17, HG-04, and other segments with potential wetlands, Public Works will implement the following measures:</li> <li>A. Wetlands near proposed trail alignments will be delineated and flagged.</li> <li>B. The trail will be routed to avoid wetlands to the greatest extent practicable.</li> <li>C. If wetlands cannot be avoided, the amount of wetland impact will be quantified and wetlands will be created within the Community Forest at a 3:1 ratio by removing soil within existing upland areas and re-vegetating with native species.</li> </ul>	Humboldt County Public Works	Parts A and B: prior to trail construction  Part C: Within one year of trail construction
CULT-1	Inadvertent Discovery Protocol for Cultural Materials: If cultural materials (e.g., chipped or ground stone, historic debris, building foundations, or bone) are discovered during ground-disturbance activities, work within 20 meters (66 feet) of the discovery shall be stopped, per the requirements of CEQA (Title 14 CCR 15064.5 [f]). Work near the archaeological find(s) shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the materials and offered recommendations for further action. Any identified cultural resources will be recorded on DPR 523 historic resource recordation forms, from the Office of Historic Preservation. If Native American archaeological remains are inadvertently encountered, the Tribal Historic Preservation Officers (THPOs) of the three recognized Wiyot-area tribes (Blue Lake Rancheria, Bear River Band of Rohnverville Rancheria, and Wiyot Tribe) will be immediately notified, permitted to observe the findings in the field, and afforded the opportunity to make recommendations for avoiding, minimizing, or mitigating impacts from the proposed development.	Humboldt County Public Works	During trail construction

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	Inadvertent Discovery Protocol for Human Remains: If human remains are discovered during project construction, work within 20 meters (66 feet) of the discovery location, and within any nearby area reasonably suspected to overlie human remains, will cease (Public Resources Code, Section 7050.5).		
CULT-2	The Humboldt County Coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws regarding the disposition of Native American burials, which fall within the jurisdiction of the California Native American Heritage Commission (NAHC) (Public Resources Code, Section 5097). In this case, the coroner will contact NAHC. The descendants or most likely descendants of the deceased will be contacted, and work will not resume until they have made a recommendation to the landowner or person responsible for excavation work with direction regarding appropriate means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.	Humboldt County Public Works	During trail construction
HYD-1	Stormwater Pollution Prevention Plan and Construction General Permit: Construction practices will utilize BMPs identified in a SWPPP to avoid or minimize the potential for erosion and sediment delivery. If required, coverage under the State's Construction General Permit will be obtained.	Humboldt County Public Works	Spring 2021
HYD-2	<b>Limited Equipment Work Period:</b> Trail construction work using heavy equipment will be limited to the period from April 1 through October 31 to avoid the wet season.	Humboldt County Public Works	April-October (annually)
HYD-3	Aggregate for Multi-use Trails and Multi-use Roads within Streamside Areas: Aggregate rock (crusher fines or other appropriate material) will be applied to multi-use trails and multi-use roads within streamside areas to reduce erosion and sediment delivery. This measure applies to portions of the following trail segments: RA-20, RA-19, RA-07, RA-08, RA-09, NM-06, NM-07, MM-01, SM-17, SM-01, SM-02.	Humboldt County Public Works	Concurrent with construction of affected trail segments
UTIL-1	<b>Domestic Water Line Protection:</b> The County will offer to replace an approximately 40-feet segment of water line leading to the inholding residence in the North McKay trail planning unit where a trail (segment NM-04) is proposed to cross.	Humboldt County Public Works	Prior to construction of trail segment NM-04

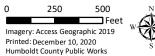
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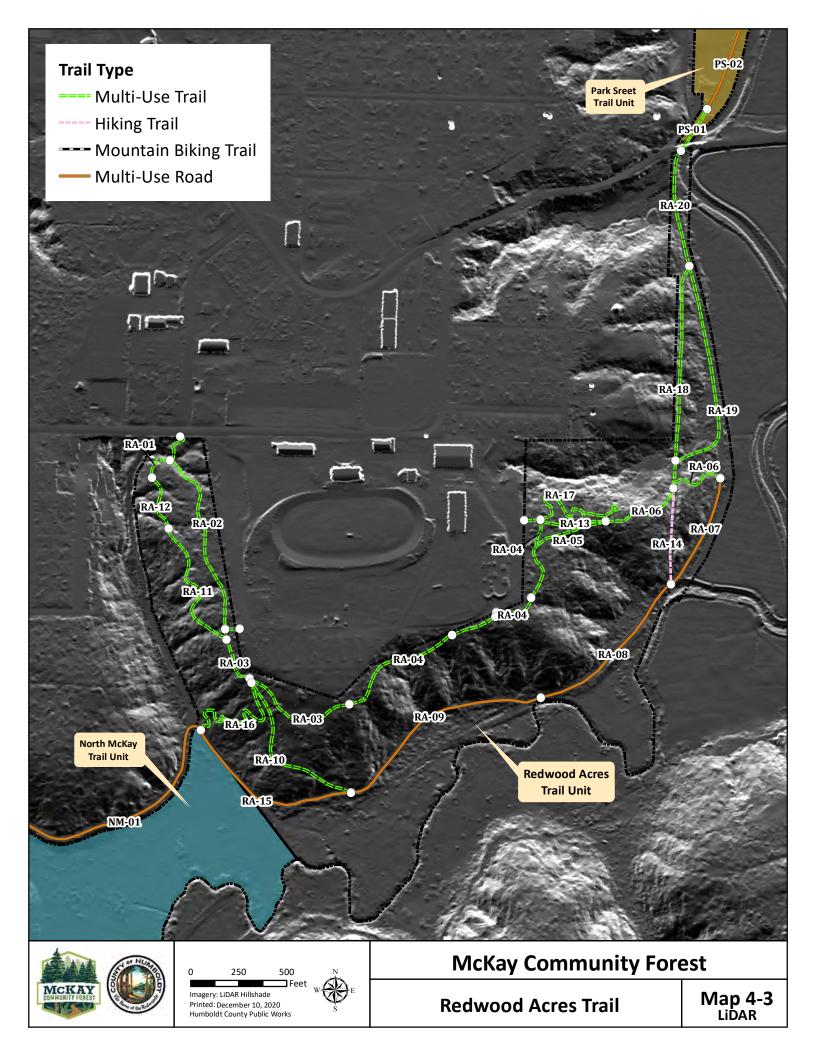
ATTACHMENT B
Trail Maps

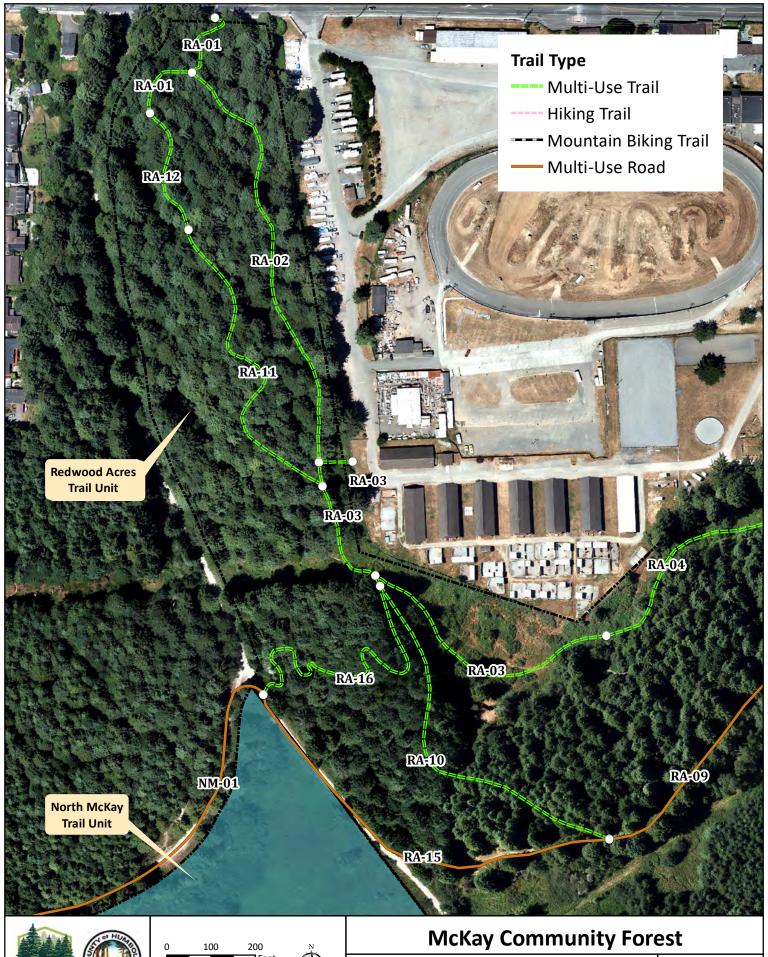




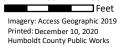








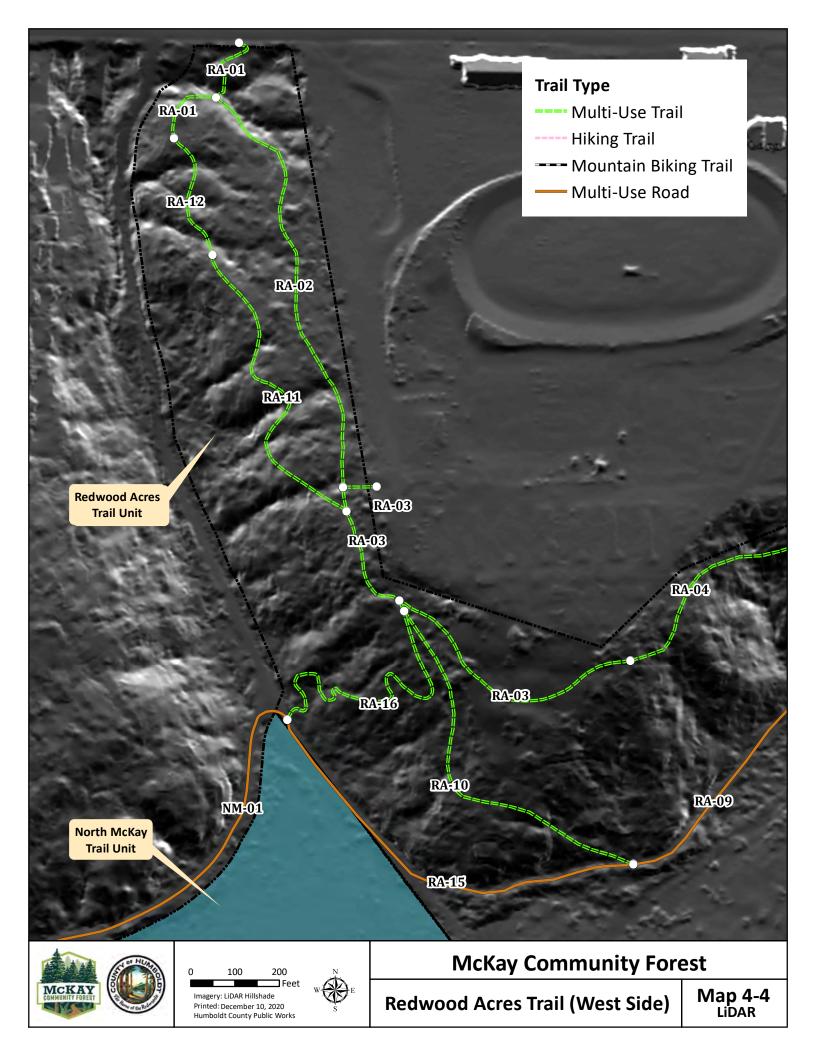


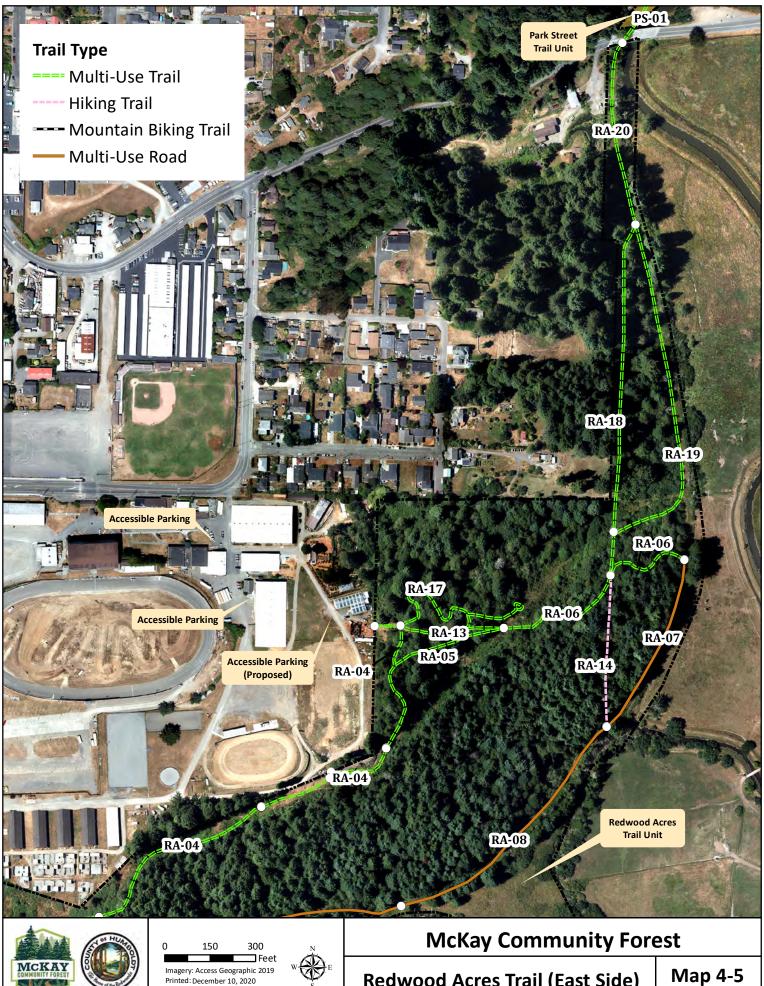




**Redwood Acres Trail (West Side)** 

Map 4-4 Aerial



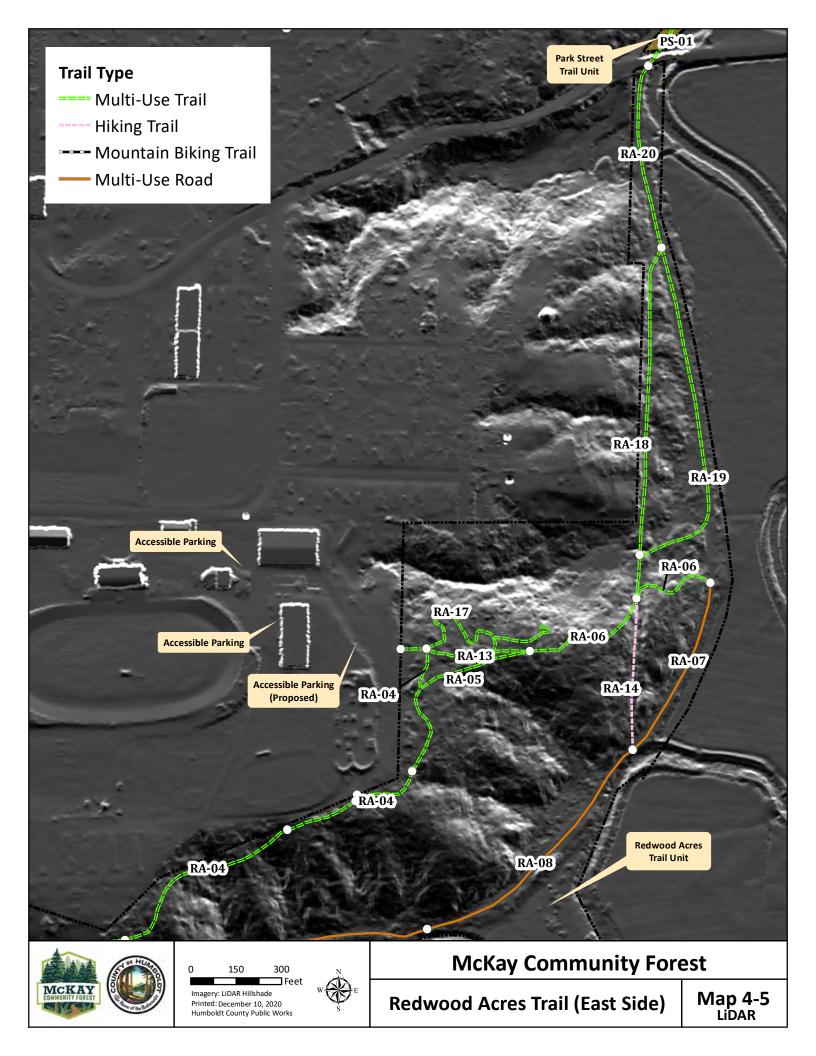


Humboldt County Public Works



**Redwood Acres Trail (East Side)** 

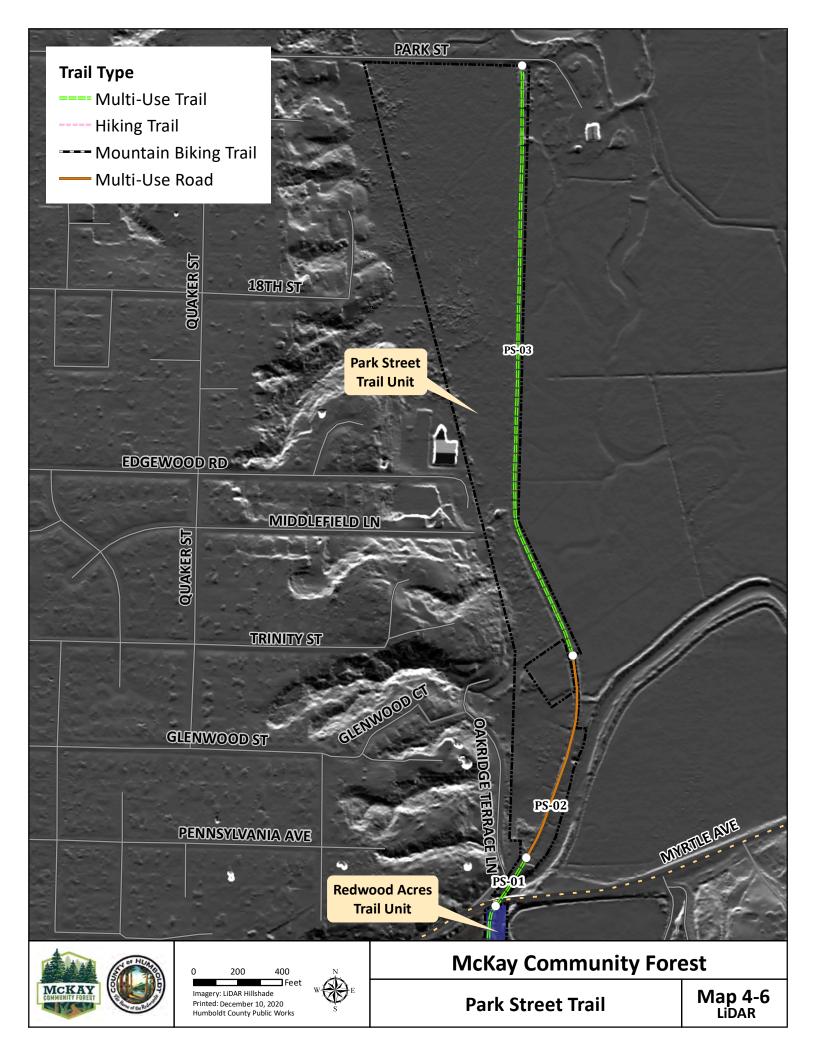
Map 4-5 Aerial

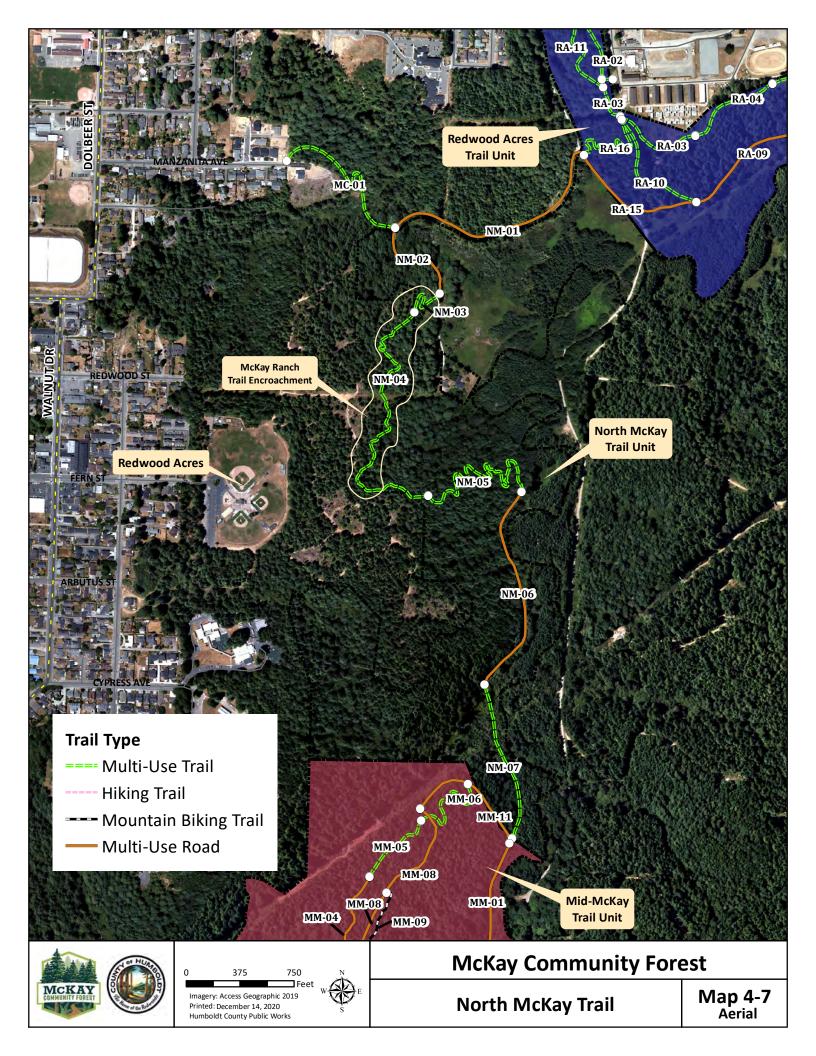


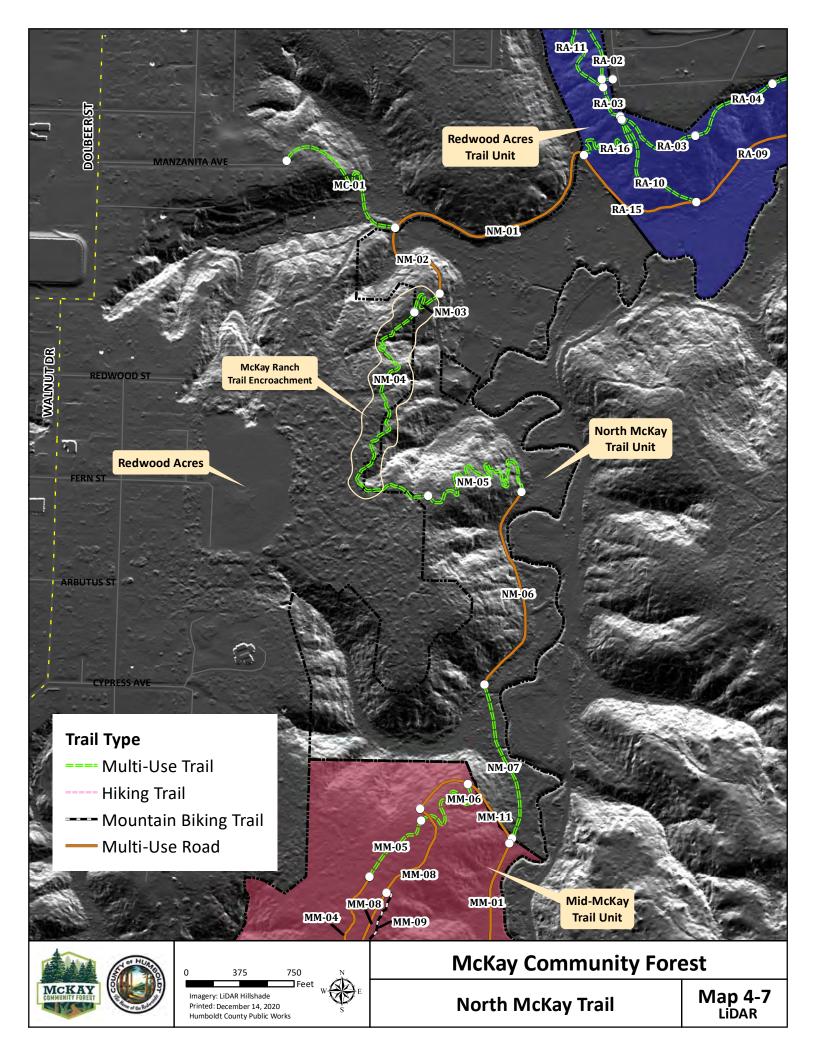


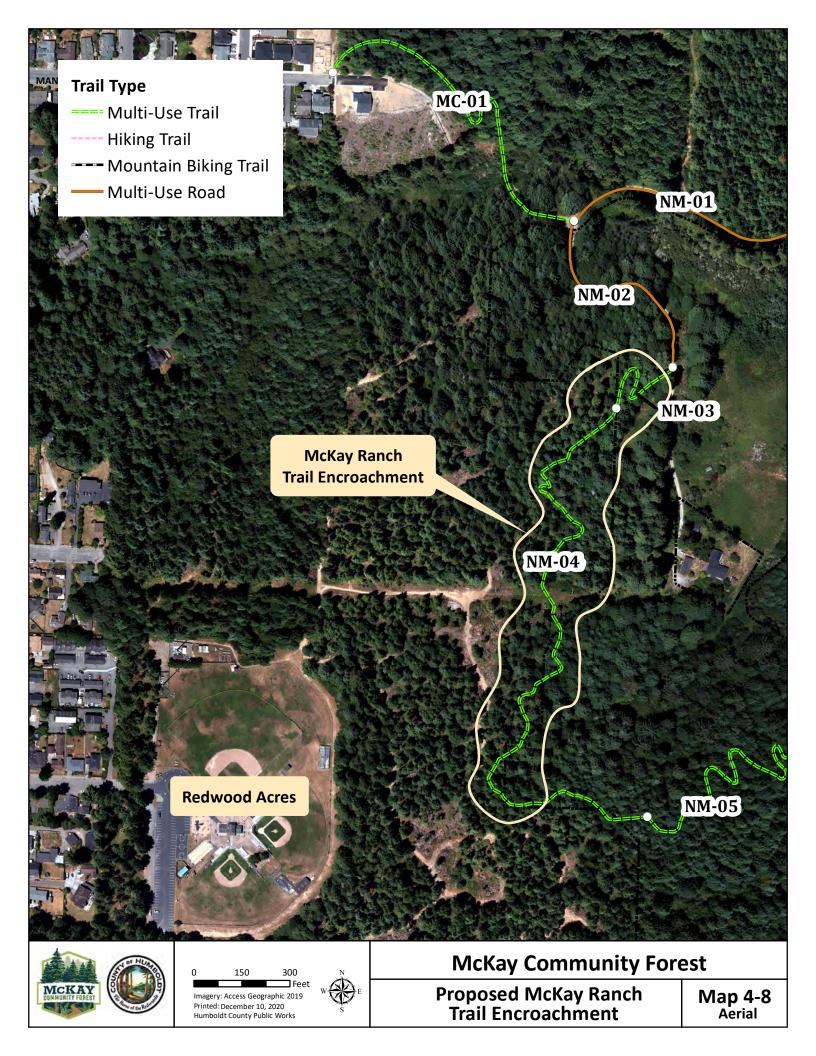


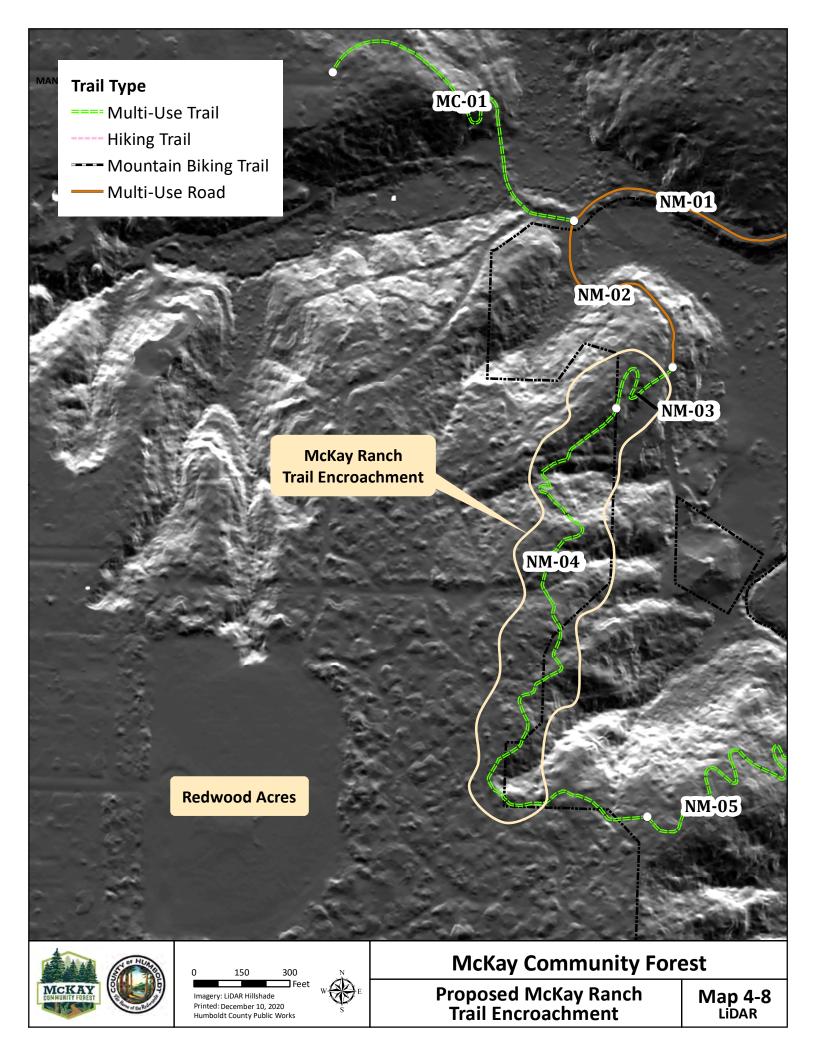


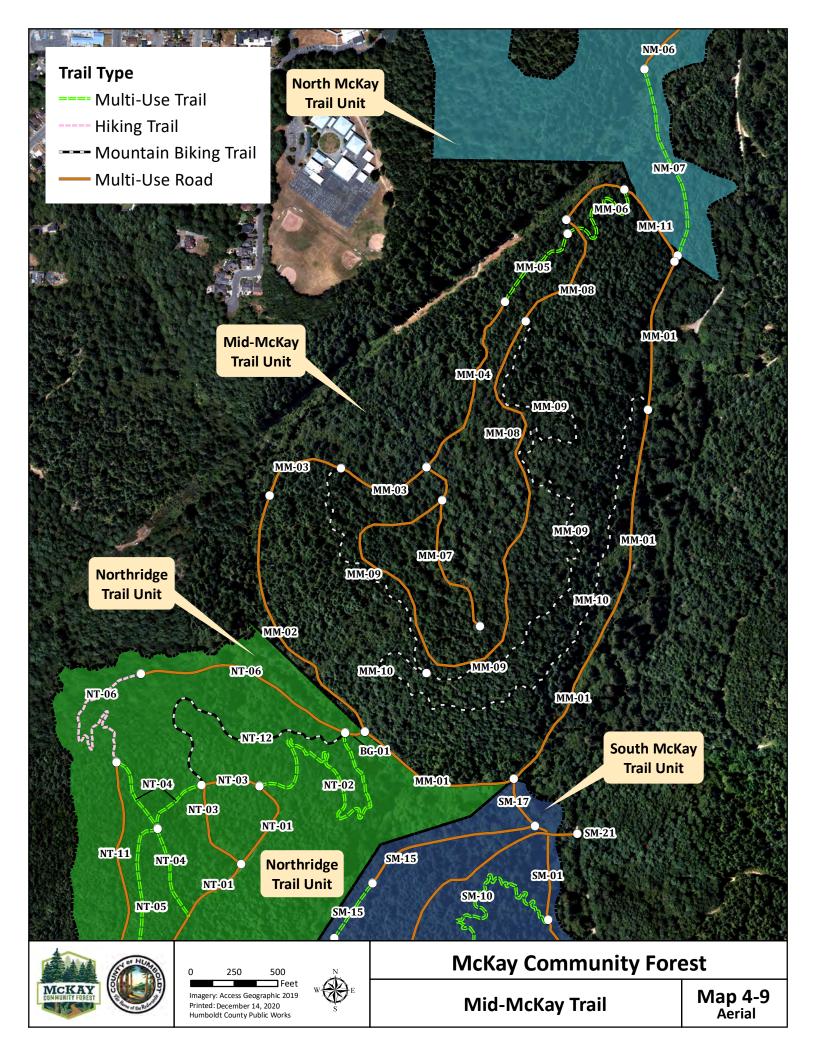


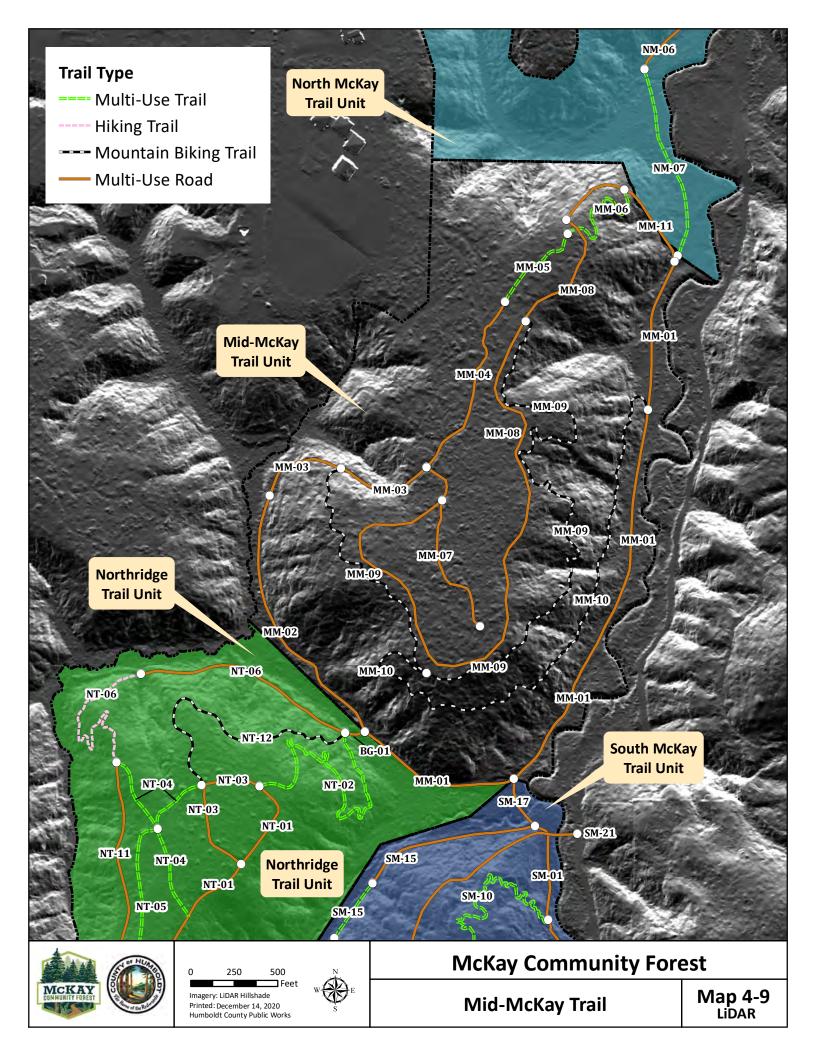


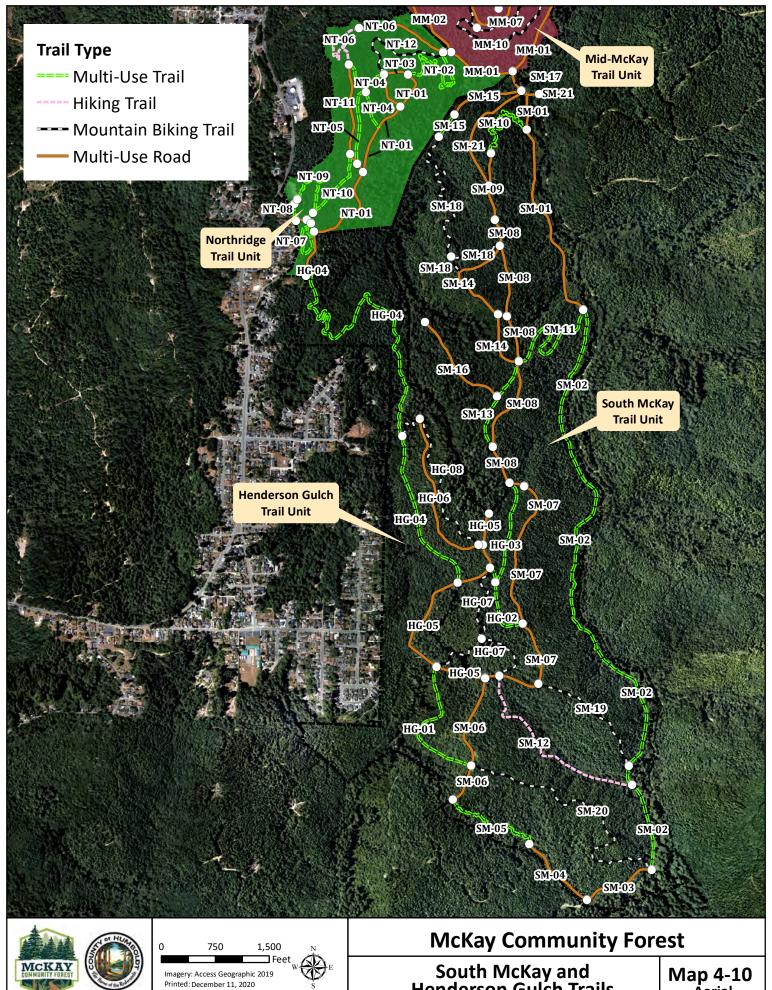




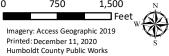






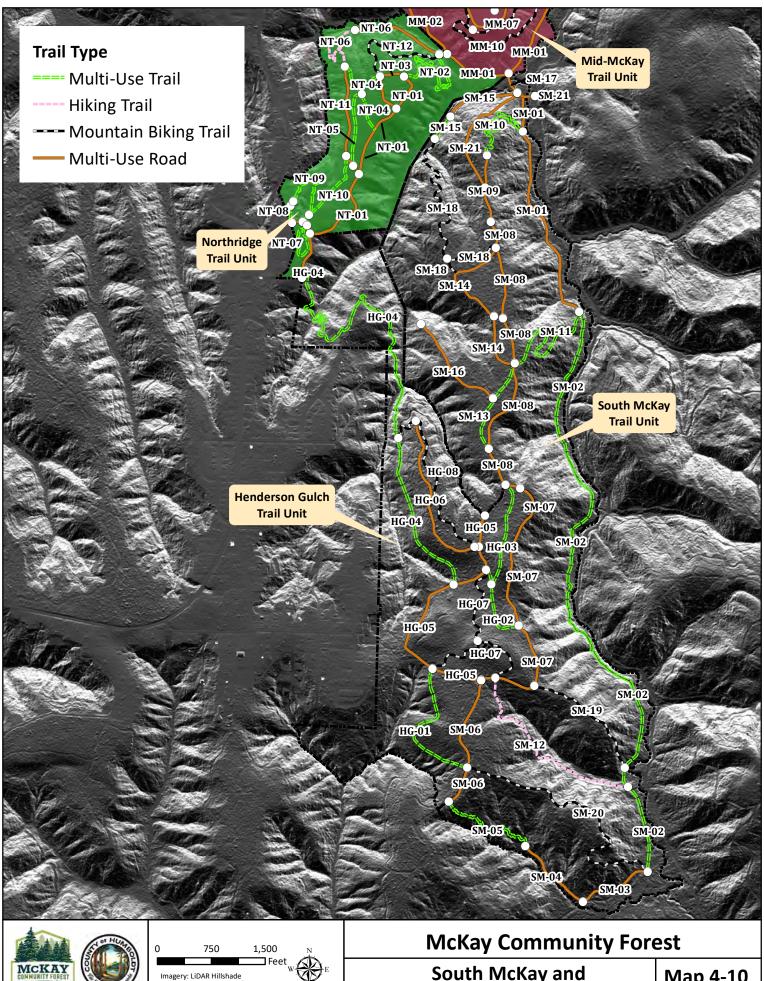






South McKay and Henderson Gulch Trails

**Aerial** 







South McKay and Henderson Gulch Trails

Map 4-10 LiDAR

