DEPARTMENT OF PUBLIC WORKS
COUNTY OF HUMBOLDT
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AREA CODE 707

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| | | | |
|---|---|---|---|
| ADMINISTRATION | 445-7491 | NATURAL RESOURCES | 445-7741 |
| BUSINESS | 445-7652 | NATURAL RESOURCES PLANNING | 267-9540 |
| ENGINEERING | 445-7377 | PARKS | 445-7651 |
| FACILITY MAINTENANCE | 445-7493 | ROADS & EQUIPMENT MAINTENANCE | 445-7421 |

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LAND USE 445-7205

# NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

June 2, 2022

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 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.

PURPOSE OF NOTICE: 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.

The Initial Study and Mitigated Negative Declaration was updated from the previous version (dated December 16, 2020) which was circulated for public review but not adopted. Updates include: supplemental information and plans to address controllable sediment discharge sources on historic logging roads converted to multi-use trails and service roads; and revising the proposed action related to the R-1 road which leads to a private inholding.

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
- http://www.humboldtgov.org/mckayforest

REVIEW PERIOD: The review period begins June 3, 2022, and ends July 5, 2022. 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. 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. The Humboldt County Board of Supervisors is expected to consider adoption of the Initial Study and Mitigated Negative Declaration on or around the meeting of August 16, 2022.

# Initial Study and Proposed Mitigated Negative Declaration

***California Environmental Quality Act (CEQA) Environmental Study***

# McKay Community Forest Trail Plan

**Humboldt County, California**

**June 2, 2022**

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

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### ATTACHMENTS

## 1.0 PROJECT OVERVIEW

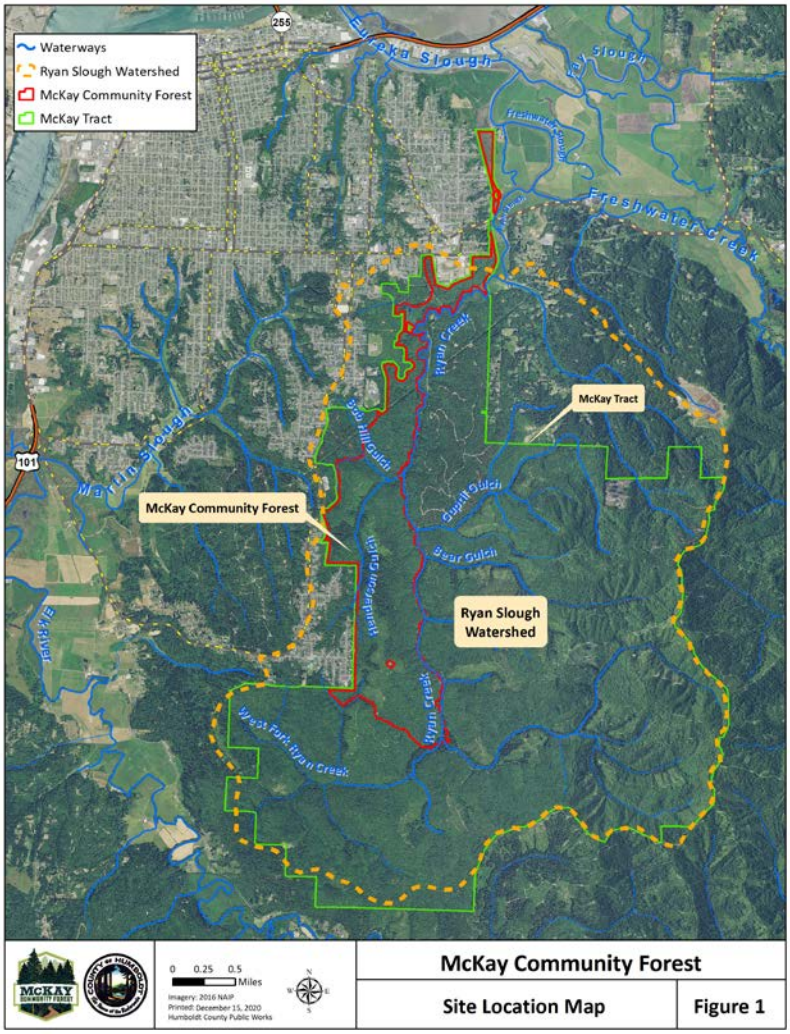
**Project Title:** McKay Community Forest Trail Plan
Link to document: https://humboldtgov.org/1808/McKay-Community-Forest

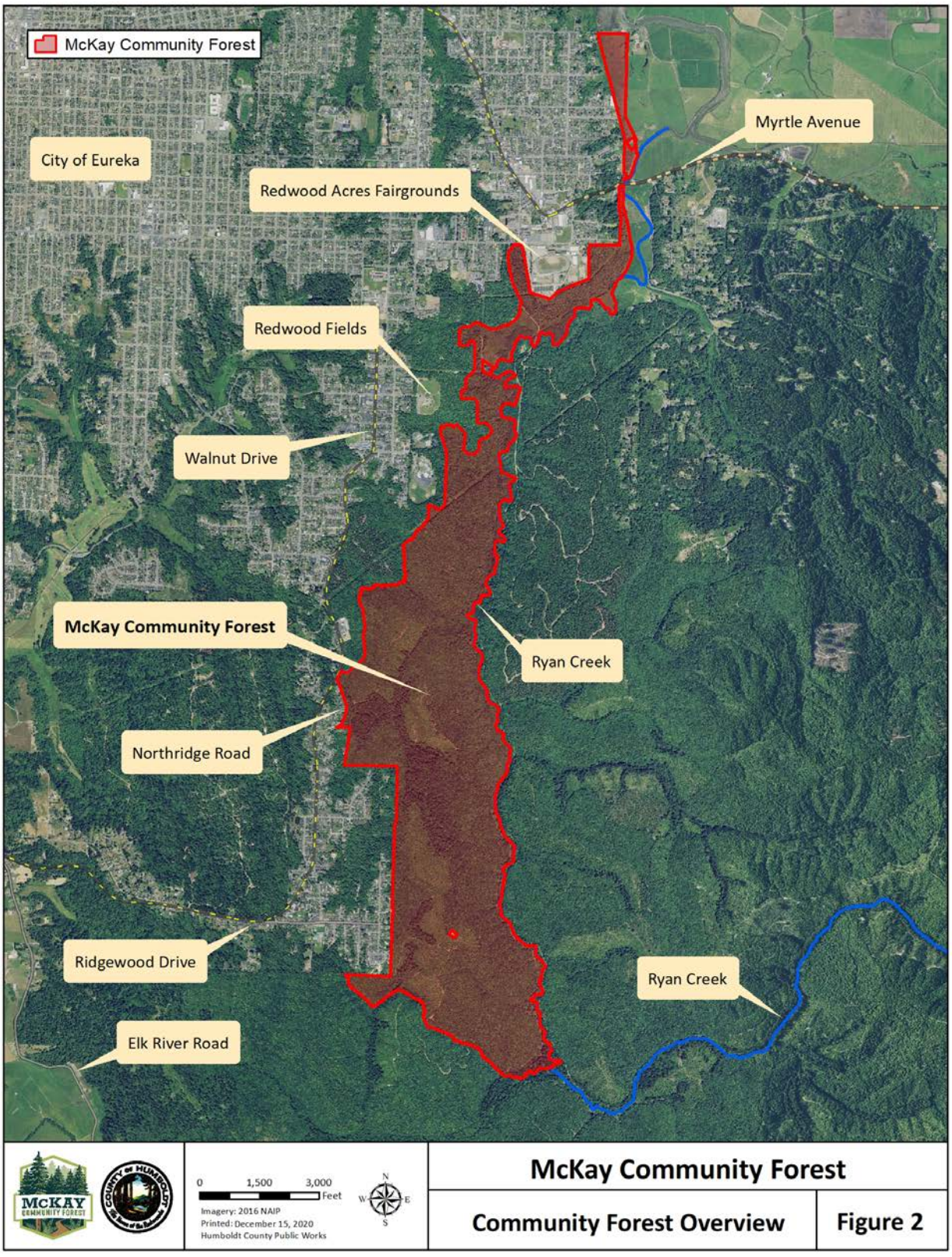
**Project Summary:** The proposed project would establish trails, access points, and amenities to provide public access and recreation at the McKay Community Forest.

**Lead Agency Name and Address:** Humboldt County Public Works Department
1106 Second Street, Eureka, CA, 95501

**Contact Person:** Hank Seemann, Deputy-Director
707-445-7741 // hseemann@co.humboldt.ca.us

**Project Location:** 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 (Figure 1).




McKay Community Forest
City of Eureka
Redwood Acres Fairgrounds
Myrtle Avenue
Redwood Fields
Walnut Drive
McKay Community Forest
Ryan Creek
Northridge Road
Ridgewood Drive
Ryan Creek
Elk River Road
0 1,500 3,000 Feet
Imagery: 2016 NAIP
Printed: December 15, 2020
Humboldt County Public Works
McKay Community Forest
Community Forest Overview
Figure 2

**Affected Parcels:**

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

**Parcel Information Key:**

| | | | |
|---|---|---|---|
| A | Archeological Resource Area | NR | Natural Resource |
| AE | Agriculture Exclusive | P | Public |
| APN | Assessor Parcel Number | Q | Qualified |
| ECP | Eureka Community Plan | R1* | Residential Single Family (minimum parcel size 6000 feet) |
| F | Flood Hazard Areas | | |
| 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 |

**Surrounding Land Uses:** 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.

# 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: https://humboldtgov.org/1808/McKay-Community-Forest. 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. Mitigation measures that will be incorporated into the project are listed in **Attachment A**.

**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. The trail network is depicted in maps contained in **Attachment B**.

**Multi-use Roads** provide vehicle access for management, maintenance, timber harvest, and/or emergency response and also serve as trails for recreational use. The general term "**multi-use road**" includes two fundamental road types: timber operation roads and service roads. The road network is depicted on maps contained in **Attachment C** and a comprehensive road and trail inventory is provided in **Attachment D**.

> **Timber operation roads** will be used for timber harvest operations and are intended to accommodate occasional use by large trucks and heavy equipment. Timber operation roads will be managed in accordance with the Forest Practice Rules. Management and use of timber operation roads are described and analyzed in the NTMP, which is a CEQA-equivalent process. The road and trail inventory identifies 9.2 miles of existing timber operation roads and 2.0 miles of new timber operation roads.
>
> **Service roads** are former logging roads that are no longer needed for timber operations but are important for providing vehicle access for trail maintenance, patrols, and emergency response. Service roads are intended to accommodate periodic use by pick-up trucks and other light vehicles. Management and use of service roads are described and analyzed in this CEQA Initial Study. The road and trail inventory identifies 1.8 miles of existing logging roads that will be converted to service roads.

**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. Equestrian use is expected on the majority of the multi-use trails and multi-use roads.

**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.

In total, the proposed trail network includes approximately 13 miles of multi-use roads, 12 miles of multi-use trails, five miles of mountain bike trails, and one mile of hiking trails. The 12 miles of multi-use trails includes 4.9 miles of existing logging roads that will be converted to multi-use trails. Additional trails may be considered in the future.

**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.

<u>Drainage</u>

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).

Hillslopes

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.

Stream Crossings

Locations where a trail crosses a stream (i.e., a geomorphic feature that conveys flowing water in a well-defined channel with a distinguishable bed and bank) warrant special measures to minimize impacts on erosion and aquatic organisms. Streams range in size from large, perennial streams to medium, ephemeral streams that convey water seasonally to small, ephemeral streams that convey water briefly

after a rain event. The first consideration is to try to avoid or minimize the number of stream crossings, to the extent feasible, by selecting alternative trail alignments. Crossing types include bridges, culverts, and fords. A useful reference for designing stream crossings is PWA (2014). Some of the key standards for stream crossings, based on the Forest Practice Rules, include the following:

- All crossings on streams that support fish or listed aquatic species shall allow for unrestricted passage of all life stages that may be present and allow for the natural movement of bedload to form a continuous bed through the crossing. The preferred option for these streams is to install a bridge crossing. The Trail Plan includes the construction of ten trail bridges (Section 2.5).
- All permanent crossings that are constructed or reconstructed shall accommodate the estimated 100-year flood flow, including debris and sediment loads.
- Critical dips shall be incorporated into the construction or reconstruction of crossings utilizing culverts, except where diversion of overflow is addressed by other methods. A critical dip is a low point across a road or trail down grade from a stream crossing that serves to intercept overflow and return it to the downstream channel rather than draining down the road or trail.
- Stream crossings and associated fills and approaches shall be constructed and maintained to prevent diversion of stream overflow down the trail and to minimize fill erosion should the drainage structure become obstructed.
- Trail approaches shall be hydrologically disconnected from the crossing to the extent feasible.
- Where a significant volume of sediment is stored upstream from a crossing that is proposed to be reconstructed or removed, the stored sediment shall be removed or stabilized.

On small and medium sized watercourses, the use of rock fords or rock armored fill crossings may be the preferred crossing design to reduce the risk of culvert failure. A rock ford is an open crossing where the streambed is stabilized with rock. Fords are a potential option where the streambanks are low, the streambed is shallow, the channel gradient is low to moderate, and the road approaches are gradually sloped. The road approaches should be surface with rock to prevent sediment delivery to the stream. Fords are especially applicable for small, ephemeral streams that flow only in direct response to rainfall.

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.

Controllable Sediment Discharge Source Treatments

**Attachment E** contains a set of tables identifying controllable sediment discharge sources on existing logging roads that are proposed for conversion to service roads or multi-use trails. The tables provide descriptions of existing conditions, proposed treatments, and timeline for treatment. This information will be incorporated into the Erosion Control Plan for the County's NTMP that will be submitted to the Regional Water Board for coverage under the NTMP General Waste Discharge Requirements.

Standards and Regulations

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

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

Public Comments on Previous Initial Study and Mitigated Negative Declaration

On December 16, 2020, the County released an Initial Study and Mitigated Negative Declaration regarding this project for public review. The review period ended January 19, 2021. This previous version was not adopted, and the current document reflects updates and revisions from the previous version. In particular, additional information was incorporated to address controllable sediment discharge sources, more specific information was incorporated into the proposed action related to the R-1 road which leads to a private inholding, and the analysis of transportation (Section XVII) was expanded. **Attachment F** contains the comments received from December 2020 through February 2021 on the previous version.

Timeline

Trail construction is expected to begin in August 2022. Trails will be constructed incrementally in a series of small, discrete projects, primarily with volunteers. Build-out of the full trail network may require five to eight 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 not 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. Instead, a trailhead and set of trails will be constructed separate and offset from the R-line road.

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.

The North McKay Ranch Subdivision Project consists of the development of 320 dwelling units, 22,000 square feet of commercial uses, and approximately 21.73 acres of undeveloped open space, to be developed in nine phases over a period of 20 years. 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 Draft Environmental Impact Report 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.

On March 22, 2022, the Board of Supervisors certified the Environmental Impact Report for the McKay Ranch subdivision and approved a Development Agreement. According to the Development Agreement, the developer will provide an easement for a trail along the eastern boundary of the subdivision when the first subdivision phase is recorded. This easement would enable construction of a trail that bypasses the private inholding. This easement would enable a continuous trail connecting the northern and southern sections of the Community Forest. As the phases of development proceed, up to six open space areas will be progressively conveyed to the County as parkland dedications.

## 2.4 Potential Future Access Points Not Included in Initial Study

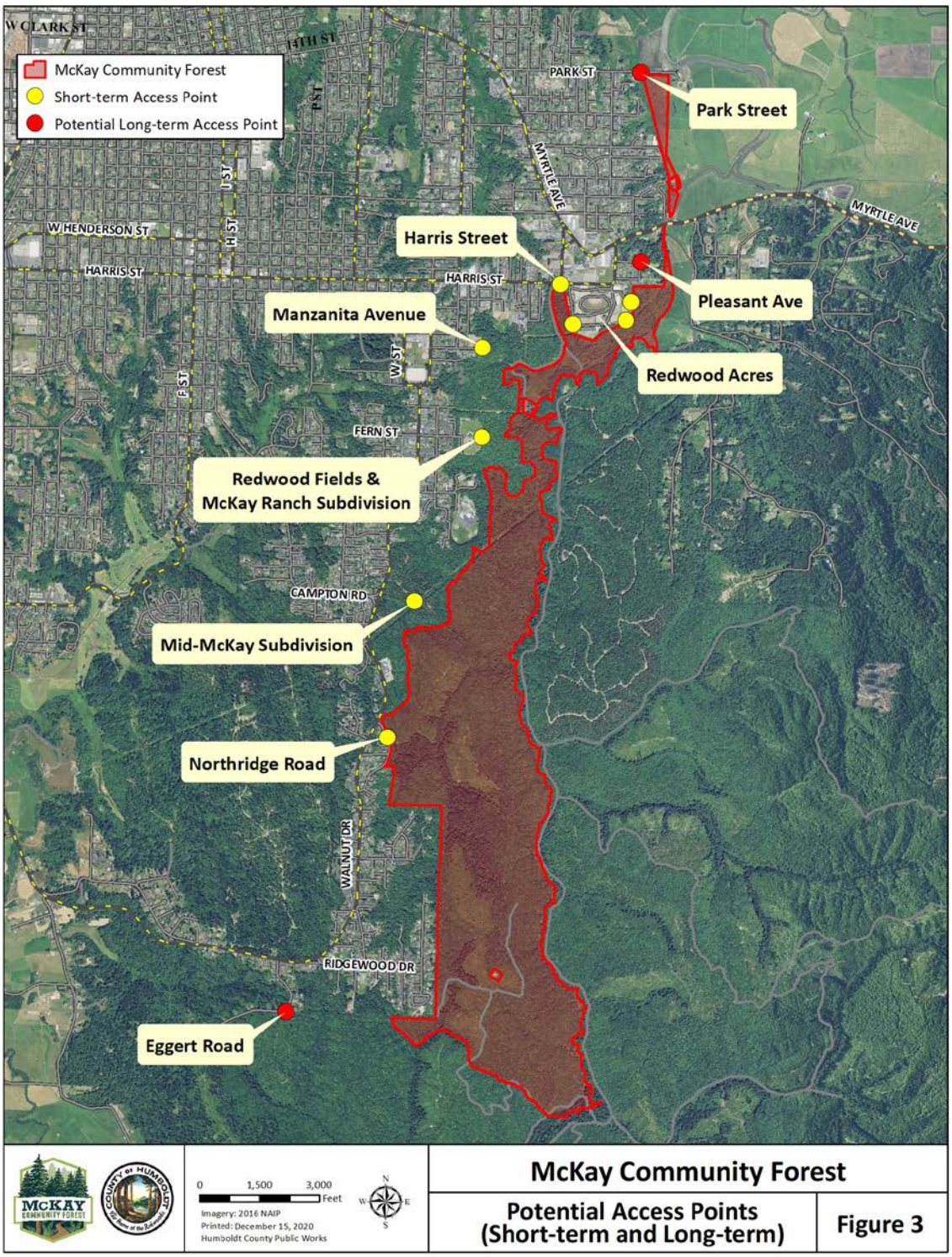
**Manzanita Avenue**
Manzanita Avenue is a local road within Cutten near the northwest side of the Community Forest. The east end of Manzanita Avenue is separated from the Community Forest by private property which is currently undeveloped. Access to the Community Forest will be considered as a condition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

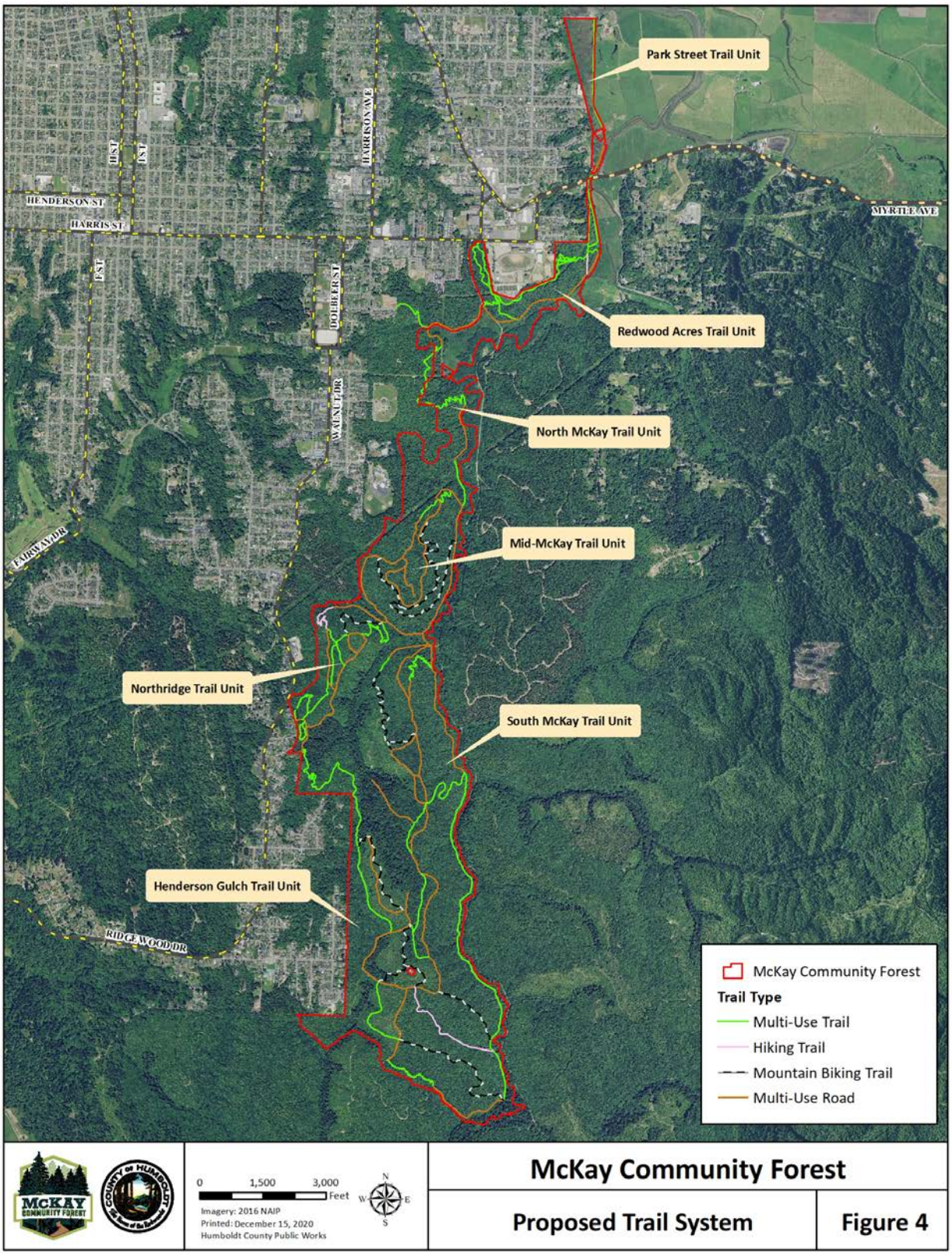
**Mid-McKay Subdivision**
This approximately 88-acre property (APN 300-011-029) near Walnut Drive and Campton Road is zoned for residential development. Provisions for public access to the Community Forest will be evaluated after the subdivision process is initiated. The Eureka Community Plan specifies 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.


McKay Community Forest
Short-term Access Point
Potential Long-term Access Point
Park Street
Harris Street
Pleasant Ave
Manzanita Avenue
Redwood Acres
Redwood Fields &
McKay Ranch Subdivision
Mid-McKay Subdivision
Northridge Road
Eggert Road
W CLARK ST
14TH ST
PARK ST
MYRTLE AVE
W HENDERSON ST
HARRIS ST
I ST
H ST
F ST
W ST
FERN ST
CAMPTON RD
WALNUT DR
RIDGEWOOD DR
0 1,500 3,000 Feet
Imagery: 2016 NAIP
Printed: December 15, 2020
Humboldt County Public Works
McKay Community Forest
Potential Access Points
(Short-term and Long-term)
Figure 3


Park Street Trail Unit
Redwood Acres Trail Unit
North McKay Trail Unit
Mid-McKay Trail Unit
Northridge Trail Unit
South McKay Trail Unit
Henderson Gulch Trail Unit
HENDERSON ST
HARRIS ST
MYRTLE AVE
HARRISON AVE
DOLBEER ST
WALNUT DR
FAIRWAY DR
RIDGEWOOD DR
McKay Community Forest
Trail Type
Multi-Use Trail
Hiking Trail
Mountain Biking Trail
Multi-Use Road
0 1,500 3,000 Feet
Imagery: 2016 NAIP
Printed: December 15, 2020
Humboldt County Public Works
McKay Community Forest
Proposed Trail System
Figure 4

## 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 |
| | Subtotal: 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 Bridge | Bob Hill Gulch | 45 feet | Bike, pedestrian, equestrian, 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.

In 2021, the California Department of Fish and Wildlife issued a Streambed Alteration Agreement for the ten trail bridges listed on Table 2 (i.e., all bridges except BR-3 and BR-12).

**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 (Figure 5). 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.

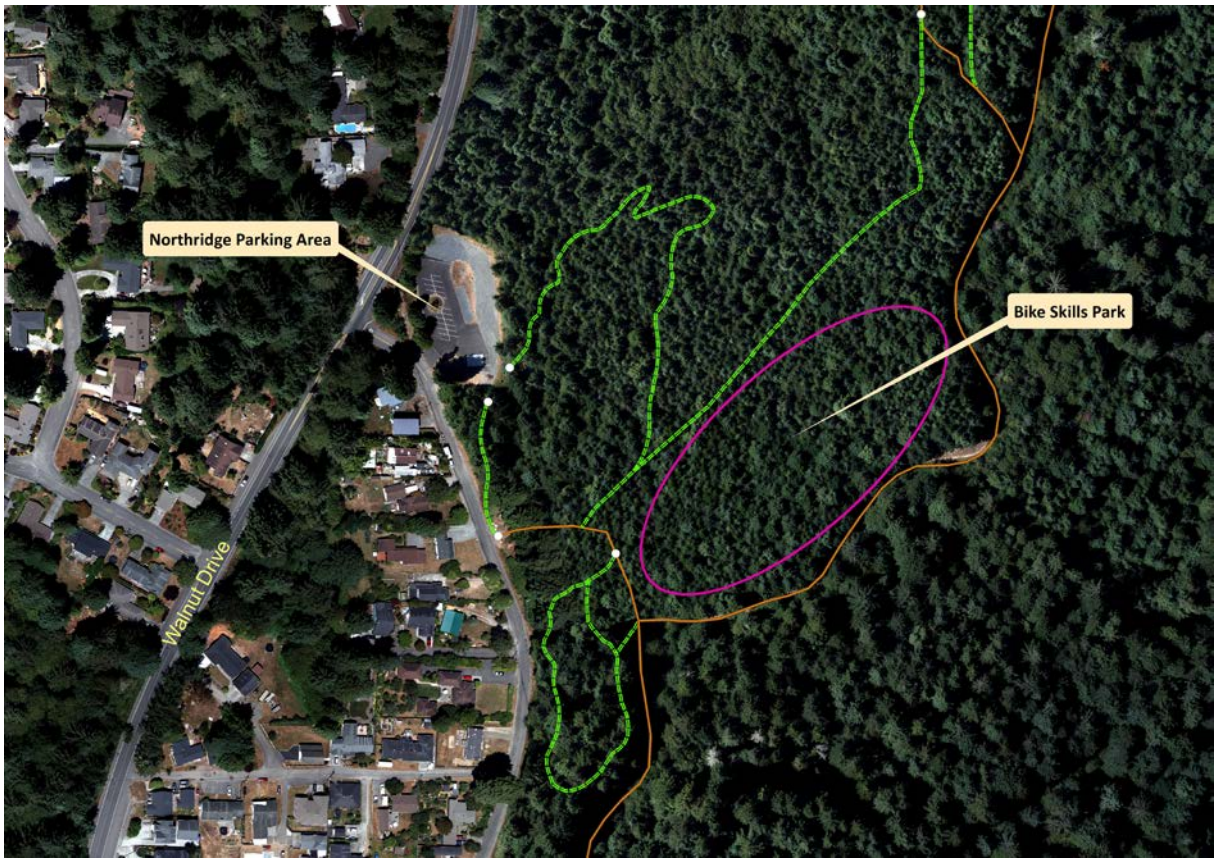



**Figure 5 Bike Skills Park near Northridge Parking Area**

**Special Provisions for R-1 Multi-use Road**

A privately-owned residential property (APN 017-071-002) is situated within the Community Forest (Figure 6). This inholding property is accessed by vehicle from Harris Street on approximately 0.84 miles of logging roads owned by Green Diamond and the County. Specifically, the property is accessed across an approximately 0.31-mile portion of the R-Line road owned by Green Diamond; an approximately 0.32-mile portion of the R-1 road owned by Green Diamond; and an approximately 0.21-mile portion of the R-1 road owned by the County. The property owners hold a non-exclusive easement (2009-6208-14) for the portions of the R-Line road and the R-1 road between Harris Street and the residence. The R-Line road and R-1 road are not open to the general public for vehicular travel. The R-Line road and the R-1 road have been used regularly by the public for many years to access the McKay Tract for hiking, biking, and other recreational uses. Under current conditions, public use is generally higher on the R-Line road than the R-1 road.

The R-Line road segment between Harris Street and the junction with the R-1 road is not proposed as part of the Community Forest trail network because the County plans to construct trails that bypass this R-Line road segment. The topography of the land between the R-Line road and Redwood Acres is favorable for trails (i.e., flat or gradually sloped) and sensitive habitat areas can generally be avoided with minimal impacts.

The County plans to designate a portion of the R-1 road (approximately 0.45 miles) as a multi-use road for hiking, biking, and equestrian use to connect the Redwood Acres trail unit with the North McKay trail unit in an area where the Community Forest is narrow and confined by sensitive areas. The R-1 road segment is proposed to connect to a new off-road trail that would extend up the hillside onto the McKay

Ranch subdivision to bypass the private inholding. The bypass trail is contingent upon the landowner granting an easement to the County. Provisions for such an easement are included in the Development Agreement for the McKay Ranch subdivision, whereby an easement would be dedicated when the map for the first subdivision phase is recorded.


**Figure 6 Road Access to Inholding Parcel**

Green Diamond owns the northern segment of the R-1 road (approximately 0.32 miles) and the County owns the southern segment (approximately 0.21). The County and Green Diamond have a reciprocal access agreement (2014-014703-54) that applies to various roads, including the R-1 road. Most of the County's access to Green Diamond's logging roads are limited to management and timber harvest activities. However, condition 1(a)(iii) of the reciprocal access agreement specifies that the portion of the R-1 road owned by Green Diamond may be used by the general public for pedestrian, equestrian, and bicycle access purposes.

The "shared roadway" approach is appropriate for low-volume, low-speed roads such as the R-1 road. Examples of the shared roadway approach include the portion of the Hammond Trail along Letz Avenue in McKinleyville; the southern end of I street in Arcata that connects to the Arcata Marsh and Wildlife Sanctuary; county roads within the Arcata Bottoms; and many city streets within Eureka, Arcata, and elsewhere. Shared roadways are common on streets and highways (Chapter 1000 of the Highway Design Manual; Caltrans, 2020). Under existing conditions (May 2022), the width of the R-1 road ranges from approximately nine to 15 feet, with a typical width of ten to 12 feet, and with approximately three wide-spots (pull-outs).

Portion of R-1 road (May 25, 2022)

Portion of R-1 road (May 25, 2022)

Portion of R-1 road (May 25, 2022)

The volume of vehicle trips on the R-1 road is low (approximately 10 to 20 one-way trips per day). Daily vehicle users include residents and visitors of the private inholding property. Occasional users include delivery vehicles and utility companies. Infrequent users include Green Diamond and the County. The R-1 road will rarely, if ever, be used for timber operations.

Drivers on the R-1 road will be responsible for driving at safe speeds, operating their vehicle with regard for the safety of other users, and being attentive to pedestrians, cyclists, and equestrians. Special provisions for using the R-1 road as a multi-use road include the following:

1. The County will install a set of permanent signs similar to the signs shown below in Exhibit 1. The purpose of the signs will be to alert drivers that they need to control their speeds and share the road, and to alert pedestrians and cyclists that they need to be prepared for vehicles driving on the road.
2. A speed limit of 15 miles per hour on the R-1 road will be established.
3. The County will periodically cut back road-side vegetation to improve sight distance. Periodic brushing and limbing is expected to result in a minimum road width of 12 feet, with a typical road width of 14 to 16 feet.
4. When heavy equipment or extra-large vehicles utilize the R-1 road under direction of the County, the County will implement traffic control with flaggers and temporary signs.
5. The County will offer to install a gate at the entrance to the private inholding property.

Alternatives to utilizing the R-1 road as a multi-use road were considered. However, the terrain and environmental conditions near the R-1 road were found to be incompatible with developing a new trail separated from the road. The R-1 road is situated at the bottom of a steep, forested hillslope with deep, incised stream channels (to the west and north) and along the edge of the Ryan Creek floodplain (to the east and south). The alternative of developing a trail west and north of the R-1 road was considered. The majority of this area is not part of the Community Forest and thus the alternative presumes that the landowner would be willing to sell property or provide an easement. However, the terrain in this area is not suitable for constructing a new trail due to the steep slopes, unstable ground, incised stream channels, and the presence of the "Cutten Branch" stream which passes through a wide floodplain. The Cutten Branch has significant potential for restoring a fish-bearing stream and will be the subject of a planning study starting later in 2022. In addition, the alternative of developing a trail east and south of the R-1 road on a fill prism or boardwalk within the Ryan Creek floodplain was considered. However, this alternative would cause significant impacts to wetlands and would require a new crossing of the Cutten Branch stream. Both of these alternatives were rejected due to the magnitude of the environmental impacts that would be caused by constructing a new trail within sensitive habitat areas, compared to the proposed shared-use of an existing road.

The concept of widening the R-1 road and using paddle markers to designate a parallel lane for trail use at the edge of the road was considered at the request of the owners of the inholding property. In some locations the road could be widened with minimal environmental impact, but in other locations road widening would have significant impacts on wetlands. The primary deficiency of this concept is that it would most likely be ineffective, because pedestrians and cyclists could easily bypass the parallel lane and utilize the full road width. Therefore, the alternative of paddle markers was rejected.


**Exhibit 1: Examples of warning signs for the R-1 multi-use road**

## 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

On April 22, 2022, the County released a draft Forest Stewardship Plan for public review and comment. The Forest Stewardship Plan is a guidance document for managing the Community Forest. This plan identifies goals, objectives, guiding principles, and conservation measures for the integrated management of the Community Forest for multiple purposes. The plan generally addresses how silviculture, fire risk reduction, habitat restoration, carbon sequestration, monitoring, and adaptive management will be implemented through the next 10 to 15 years. The Forest Stewardship Plan is a planning study that provides the context for decisions on future actions and is therefore exempt from review under CEQA. The draft Forest Stewardship Plan is available at: http://www.humboldtgov.org/mckayforest.

Non-industrial Timber Management Plan

On April 19, 2022, the County submitted a Non-industrial Timber Management Plan ("NTMP") to CAL FIRE for review. The NTMP is 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. 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. The County's NTMP for the Community Forest was issued NTMP# 1-22NTMP-00003-HUM. The NTMP is available at: https://caltreesplans.resources.ca.gov/caltrees/Default.aspx

Lower Ryan Creek Off-Channel Habitat and and Floodplain Enhancement Planning Project

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. The Cutten Branch was previously channelized to flow through a drainage ditch.

In January 2022, Redwood Community Action Agency ("RCAA") was awarded funding from the Fisheries Restoration Grant Program to develop design plans and acquire permits for an off-channel habitat and floodplain enhancement project along the Cutten Branch. This planning project will evaluate rerouting the Cutten Branch to flow through a new, off-channel ponded water feature located on the floodplain of Ryan Creek along with other connectivity enhancements in the vicinity. The planning project aims to create habitat conditions that would be available during winter and summer and take advantage of cold water inflow from the Cutten Branch. CEQA documentation will be developed as part of the planning project, which is expected to be completed in 2024. Future funding will be needed for construction.

## 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 as described in the Trail Plan (December 16, 2020).
- Conversion of historic logging roads to service roads and multi-use trails.
- Interim trail use on timber operations roads.
- 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 are included in the County's NTMP.
- Upgrades and management of timber operation roads. These activities are included in the County's NTMP.
- Construction and upgrade of new logging roads to the standards of the Forest Practice Rules. These activities are 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 on a project by project basis.

## 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"** as indicated by the checklist on the following pages:

| | | | | | |
|---|---|---|---|---|---|
| ☐ | Aesthetics | ☐ | Agriculture and Forestry Resources | ☐ | Air Quality |
| ☒ | Biological Resources | ☒ | Cultural Resources | ☐ | Energy |
| ☐ | Geology / Soils | ☐ | Greenhouse Gas Emissions | ☐ | Hazards & Hazardous Materials |
| ☒ | Hydrology / Water Quality | ☐ | Land Use / Planning | ☐ | Mineral Resources |
| ☐ | Noise | ☐ | Population / Housing | ☐ | Public Services |
| ☐ | Recreation | ☐ | Transportation | ☐ | Tribal Cultural Resources |
| ☒ | 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 have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. |
| ☒ | I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. |
| ☐ | I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. |
| ☐ | I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. |
| ☐ | I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. |

Hank Selman

Signature

June 2, 2022

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.

| **I. AESTHETICS**. Except as provided in Public Resources Code Section 21099, would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Have a substantial adverse effect on a scenic vista?<br><br>Threshold of significance: Temporary or permanent change in the physical environment that would be perceived by the public as detracting from the views or lines of sight from a scenic vista. | ☐ | ☐ | ☒ | ☐ |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?<br><br>Threshold of significance: Permanent change to the physical environment that would eliminate or substantially alter or degrade scenic resources within a state scenic highway. | ☐ | ☐ | ☐ | ☒ |
| c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?<br><br>Threshold of significance: Permanent changes in the project area that would degrade the key elements of the visual character or quality of the project area. | ☐ | ☐ | ☒ | ☐ |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?<br><br>Threshold of significance: Introduction of a temporary or permanent source of light or glare that would detract from an area that is otherwise 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 |
|---|---|---|---|---|
| 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?<br><br>Threshold of significance: Conversion of more than one acre of agricultural lands that are designated under the Farmland Mapping and Monitoring Program. | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?<br><br>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. | ☐ | ☐ | ☐ | ☒ |

| | | | | |
|---|---|---|---|---|
| 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))?<br><br>Threshold of significance: Change in land management or land use regulation that would substantially affect more than one acre of forestland or timberland. | ☐ | ☐ | ☐ | ☒ |
| d) Result in the loss of forest land or conversion of forest land to non-forest use?<br><br>Threshold of significance: Conversion of more than three acres of forest land to non-forest uses. | ☐ | ☐ | ☐ | ☒ |
| 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?<br><br>Threshold of significance: Introduction of changes into the 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?<br><br>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?<br><br>Threshold of significance: Generation of pollutants by the project that would cumulatively contribute to non-attainment for any priority pollutant. | ☐ | ☐ | ☒ | ☐ |
| c) Expose sensitive receptors to substantial pollutant concentrations?<br><br>Threshold of significance: Pollutant loading generated by the project near sensitive receptors that would result in a locally significant air quality impact. | ☐ | ☐ | ☒ | ☐ |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?<br><br>Threshold 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 (http://www.ncuaqmd.org/index.php?page=aqplanning.ceqa).

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 ($PM_{10}$), for which Humboldt County is designated "nonattainment." $PM_{10}$ air emissions include chemical emissions and other inhalable particulate matter with an aerodynamic diameter of less than 10 microns. $PM_{10}$ 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 $PM_{10}$, which is summarized in the draft report entitled Particulate Matter $PM_{10}$ 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?<br><br>Threshold of significance: 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. | ☐ | ☒ | ☐ | ☐ |

| | | | | |
|---|---|---|---|---|
| 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?<br><br>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. | ☐ | ☒ | ☐ | ☐ |
| 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?<br><br>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?<br><br>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?<br><br>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?<br><br>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. | ☐ | ☐ | ☐ | ☒ |

**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 (trail planning unit) | Description | Potential Impact |
|---|---|---|---|---|
| *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 Alnus rubra Forest Alliances) | S3/None (Note 2) | 55.8 |
| Holcus lanatus–Anthoxanthum odoratum Semi-natural Herbaceous Alliance | None | 3.2 |

**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 non-hydrophytic 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 and 2021 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 2021, S.E. McAllister, performed spot check surveys for the Henderson Gulch activity center and the two activity centers located within 0.25 miles of the Community Forest boundary. No spotted owls were detected by McAllister or Green Diamond within the survey areas for these activity centers.

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 (USFWS, 2019). Although this guidance document applies to timber operations and not for trail development, the document is used as reference to develop appropriate mitigation measures.

<u>Aquatic Habitat</u>
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. The Community Forest is within the range of the marbled murrelet, however specific habitat elements such as unfragmented stands of old-growth or mature forests with large limbs do not exist within or adjacent to the Community Forest. Individual tree attributes that provide conditions suitable for nesting for this species (i.e., provide a nesting platform) include large branches (ranging from 4 to 32 inches diameter, with an average of 13 inches) or forked branches; deformities (e.g., broken tops); dwarf mistletoe infections; witches' brooms; and growth of moss or other structures large enough to provide a platform for a nesting adult murrelet. No sightings of this species within the Community Forest or adjacent areas have been reported to the California Natural Diversity Database.

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. Stream crossings will follow the standards identified in Section 2.2.

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 un-surveyed 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 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 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?<br><br>Threshold of significance: Physical changes in known or designated historical resources, or in their physical surroundings, in a manner that would degrade their significance. | ☐ | ☒ | ☐ | ☐ |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?<br><br>Threshold of significance: 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?<br><br>Threshold of significance: Disturbance of human burial sites as a result of project construction activities. | ☐ | ☒ | ☐ | ☐ |

**DISCUSSION**:

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 |
|---|---|---|---|---|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?<br><br>Threshold of significance: | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?<br><br>Threshold of significance: | ☐ | ☐ | ☐ | ☒ |

**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.<br><br>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?<br><br>Threshold of significance: Loss or damage to project elements as a result of seismically derived ground movement. | ☐ | ☐ | ☒ | ☐ |
| iii) Seismic-related ground failure, including liquefaction?<br><br>Threshold of significance: Loss or damage to project elements as a result of seismically derived ground failure. | ☐ | ☐ | ☐ | ☒ |
| iv) Landslides?<br><br>Threshold of significance: Loss or damage to project elements due to landslides. | ☐ | ☐ | ☒ | ☐ |
| b) Result in substantial soil erosion or the loss of topsoil?<br><br>Threshold of significance: Erosion by water or wind of more than a minimal volume of earth materials. | ☐ | ☐ | ☒ | ☐ |
| 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?<br><br>Threshold of significance: Secondary instability of earth materials, related to the project, that could subsequently fail, damaging project elements or other sites or structures. | ☐ | ☐ | ☒ | ☐ |
| 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?<br><br>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?<br><br>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?<br><br>Threshold of significance: Disturbance of a unique paleontological resource or site or unique geologic feature as a result of project construction activities. | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**:

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?<br><br>Threshold of significance: For land use development projects, the threshold is annual emissions less than 1,100 metric tons per year (MT/yr) of carbon dioxide equivalent ($CO_2e$). For stationary-source projects, the threshold is 10,000 metric tons per year (MT/yr) of $CO_2e$. | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG?<br><br>Threshold of significance: Substantial conflict with a goal, standard, or implementation measure of an applicable plan, policy, or regulation for GHG reduction. | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**:

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 |
|---|---|---|---|---|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?<br><br>Threshold of significance: Potential storage or use of chemicals, on a regular basis, that could be hazardous if released into the environment. | ☐ | ☐ | ☐ | ☒ |
| 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?<br><br>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?<br><br>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?<br><br>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?<br><br>Threshold of significance: Increase in use intensity by people within the boundaries of, or within two miles of, the Airport Planning Area for a public airport. | ☐ | ☐ | ☐ | ☒ |
| f) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?<br><br>Threshold of significance: Physical change in the environment that would interfere with emergency responses or evacuations. | ☐ | ☐ | ☐ | ☒ |

| | | | | |
|---|---|---|---|---|
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?<br><br>Threshold of significance: Increased exposure of people or structures to significant risk of life involving wildland fires. | ☐ | ☐ | ☒ | ☐ |

**DISCUSSION**:

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.

| **X. HYDROLOGY AND WATER QUALITY**. Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?<br><br>Threshold of significance: Discharge of sediment or other pollutants that would violate Basin plan standards or Waste Discharge Requirements associated with National Pollution Discharge Elimination System Permit (NPDES) permits. | ☐ | ☒ | ☐ | ☐ |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?<br><br>Threshold of significance: Change in groundwater levels or storage that would affect potential uses of groundwater. | ☐ | ☐ | ☐ | ☒ |
| 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:<br>i) result in substantial erosion or siltation on- or off-site;<br>ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;<br>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<br>iv) impede or re-direct flood flows?<br><br>Threshold of significance: Erosion due to concentrated runoff from the project site. | ☐ | ☒ | ☐ | ☐ |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?<br><br>Threshold of significance: Storage of hazardous materials using systems 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?<br><br>Threshold of significance: Potential for release of pollutants in violation of a water quality control plan or sustainable groundwater management plan. | ☐ | ☒ | ☐ | ☐ |

**DISCUSSION**:

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 within the Phase I property and identify sites and areas that have the potential to deliver sediment to waterways and impact water quality (PWA, 2014). The County retained BBW & Associates (BBW) to evaluate the road network within the Phase II property which was acquired in 2020. Thus, the County has a complete inventory of controllable sediment discharge sources associated with historical logging roads within the Community Forest (see further discussion below).

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. This action will minimize and hopefully avoid the creation of unauthorized trails in inappropriate locations.
- Logging roads have been integrated into the trail network to minimize ground disturbance.
- In some situations, 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.
- The Trail Plan (Section 2) 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 consulted 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). On January 11, 2021, the County received an e-mail from Joshua Luders of the Regional Water Board stating that the Construction General Permit does not apply to the Trail Plan.

Controllable Sediment Discharge Sources

The Regional Water Board's Order No. R1-2013-0005 provides General Waste Discharge Requirements for discharges from timber operations associated with Non-Industrial Timber Management Plans (NTMPs) in the North Coast Region. As part of the development of an NTMP, the landowner is required to develop and submit an Erosion Control Plan for controllable sediment discharge sources (CSDS). CSDS are defined as sites or locations within the logging area that meet all the following conditions:

1. is discharging or has the potential to discharge sediment to waters of the state in violation of water quality requirements or other provisions of the Waste Discharge Requirements;
2. was caused or affected by human activity; and
3. may feasibly and reasonably respond to prevention and minimization management measures.

CSDS within the Community Forest are primarily associated with historical logging roads and skid trails. The Community Forest has a unique situation where portions of existing logging roads and skid trails will be retained and upgraded for future timber operations (9.2 miles), while other portions are being converted to multi-use trails (4.9 miles) or service roads with no timber operations (1.8 miles), and a small portion is planned to be fully decommissioned (0.3 miles). Treatments for CSDS need to be carefully planned by considering the risks or tradeoffs of disturbing existing vegetation and the potential disturbance associated with providing access for heavy equipment, if needed.

**Attachment D** contains the road and trail inventory which provides a break-down on the proposed disposition of each segment of the historical logging roads.

**Attachment E** contains a set of tables identifying the CSDS on existing logging roads that are proposed for conversion to service roads or multi-use trails. The tables provide descriptions of existing conditions, proposed treatments, and timeline for treatment. This information will be incorporated into the Erosion Control Plan for the County's NTMP that will be submitted to the Regional Water Board for coverage under the NTMP General Waste Discharge Requirements.

**X. (a), (c), (e) - Less than significant with mitigation incorporated:** CSDS on logging road conversions will be treated at the time of trail construction, except certain CSDS in sensitive areas will be prioritized. 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. 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 four 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: Controllable Sediment Discharge Sources:** The project includes treatments of Controllable Sediment Discharge Sources as listed in **Attachment E**.

**Mitigation Measure HYD-2: Stormwater Pollution Prevention Plan:** Construction practices will utilize BMPs identified in a SWPPP to avoid or minimize the potential for erosion and sediment delivery.

**Mitigation Measure HYD-3: 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-4: 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?<br><br>Threshold of significance: Placement of a new structure that results in a perception that the project will physically divide an existing community for a duration greater than the construction period. | ☐ | ☐ | ☐ | ☒ |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?<br><br>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. | ☐ | ☐ | ☒ | ☐ |

**DISCUSSION**:

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 |
|---|---|---|---|---|
| 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?<br><br>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. | ☐ | ☐ | ☐ | ☒ |

| | | | | |
|---|---|---|---|---|
| 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?<br><br>Threshold of significance: Change in land use that would result in the loss of availability of locally-important mineral resource recovery site. | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**:

**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?<br><br>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?<br><br>Threshold of significance: 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?<br><br>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. | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**:

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 deter night-time use. The access point 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 only be 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 |
|---|---|---|---|---|
| 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)?<br><br>Threshold of significance: Removal of an existing impediment to population growth due to an extension of an existing roadway and improved traffic circulation in the project area. | ☐ | ☐ | ☐ | ☒ |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?<br><br>Threshold of significance: Demolition or removal of five or more existing housing units as a result of the project. | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**:

**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?<br>Threshold of significance: Changes to an existing fire-protection system, or perceived need for such changes. | ☐ | ☐ | ☐ | ☒ |
| b) Police protection?<br>Threshold of significance: Changes to an existing law enforcement system, or perceived need for such changes. | ☐ | ☐ | ☐ | ☒ |
| c) Schools?<br>Threshold of significance: Changes in existing school enrollments, or the uses of schools, or perceived need for such changes. | ☐ | ☐ | ☐ | ☒ |
| d) Parks?<br>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?<br>Threshold of significance: Changes to other public facilities that are not directly a part of the County's roadway or storm water conveyance system. | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**:

**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?<br><br>Threshold of significance: 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?<br><br>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?<br><br>Threshold of significance: 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)?<br><br>Threshold of significance: 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)?<br><br>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?<br><br>Threshold of significance: Project-related traffic restrictions that would prevent emergency vehicles from reaching necessary locations. | ☐ | ☐ | ☒ | ☐ |

**DISCUSSION**:

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 presents 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.

Vehicle Miles Traveled

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. Concurrently, the project will also reduce vehicle miles traveled by offsetting the demand for longer trips to similar, more distant destinations such as Avenue of the Giants, Elk River Headwaters, Arcata Community Forest, or Prairie Creek State Park. Therefore, as a whole, the project is essentially neutral with respect to vehicle miles traveled.

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).

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.

Multi-use Roads within the Community Forest

The trail network includes multi-use roads, multi-use trails, mountain bike trails, and hiking trails. Multi-use roads include timber operation roads and service roads. With the exception of the R-1 road, the multi-use roads will have limited and intermittent vehicular use. Timber operations will be limited to relatively small portions of the Community Forest for approximately six to eight weeks in the summer and fall. During timber operations, traffic control points will be set up to limit access by recreational users to the active timber operation area, and warning signs will be placed to notify trail users about the potential presence of logging trucks on timber operation roads. Pick-up trucks operated by County staff or contractors would be occasionally present on service roads.

As discussed in Section 2.5, the residents of the inholding property utilize 0.31 miles of the R-Line road and 0.53 miles of the R-1 road for transportation between their residence and Harris Street. The County proposes to designate 0.45 miles of the R-1 road as a multi-use road that would include hiking, biking, and equestrian use. As discussed in Section 2.5, the "shared roadway" approach is appropriate for low-volume, low-speed roads such as the R-1 road. Similar examples include the portion of the Hammond Trail along Letz Avenue in McKinleyville; the southern end of I street in Arcata that connects to the Arcata Marsh and Wildlife Sanctuary; county roads within the Arcata Bottoms; and many city streets within Eureka, Arcata, and elsewhere. Shared roadways are common on streets and highways (Chapter 1000 of the Highway Design Manual; Caltrans, 2020). The volume of vehicle trips on the R-1 road is low (approximately 10 to 20 one-way trips per day). Daily vehicle users include residents and visitors of the private inholding property. Occasional users include delivery vehicles and utility companies. Infrequent users include Green Diamond and the County. The R-1 road will rarely, if ever, be used for timber operations.

Special provisions for using the R-1 road as a multi-use road were listed in Section 2.5. These provisions include a series of permanent warning signs, designation of a 15 miles-per-hour speed limit, periodic maintenance of road-side vegetation, traffic control for heavy equipment and extra-large vehicles managed by the County, and offering to install a gate near the entrance to the private inholding.

**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 to the Community Forest, but that increase will be equally or partially offset by reducing the demand for longer distance trips to other, similar destinations. 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) - Less than significant impact:** The project involves modifications to existing logging roads as part of the trail network. The majority of the existing logging roads will be utilized as multi-use roads (classified as either timber operation roads or service roads) that includes recreational use. The City of Arcata uses this same approach for roads within the Arcata Community Forest. Vehicle use of multi-use roads within the Community Forest will be limited to County staff, County contractors, Green Diamond, and other parties with special authorization, with the exception of the R-1 road, where the residents of the inholding property hold an easement for their own personal vehicular use.

A shared-use approach is compatible with low-volume, low-speed roads such as the R-1 road. Drivers on the R-1 road will be responsible for operating their vehicle at safe speeds, operating their vehicle with regard for the safety of other users, and yielding to pedestrians, cyclists, and equestrians. A primary strategy for transportation safety is to reduce vehicle speeds and increase driver attention (Governor's Office of Planning and Research, 2016). Speed reduction can best be achieved by measures that provide cues to motorists to slow their vehicle speed. The project incorporates these measures through the placement of warning signs to help increase driver attention.

The potential for conflicts on the R-Line road will likely be reduced as a result of the project by diverting a portion of the existing pedestrian and bicycling use to the parallel trails that will be developed. The potential for conflicts on the R-1 road will likely be similar or improve as a result of the project. While the number of trail users on the R-1 road may increase, the road conditions will be improved by reducing vehicle speeds and increasing driver attention for non-motorized users.

**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 emergency 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.

| **XVIII. 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?<br>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.<br><br><u>Threshold of significance</u>: Adverse alteration of those physical characteristics of a tribal cultural resource that are significant for its eligibility in the national, state, or local register. | ☐ | ☐ | ☒ | ☐ |

**DISCUSSION**:
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 inadvertent discovery protocols, which are incorporated as mitigation measures CULT-1 and CULT-2. 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?<br><br>Threshold of significance: 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?<br><br>Threshold of significance: 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?<br><br>Threshold of significance: 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?<br><br>Threshold of significance: 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?<br><br>Threshold of significance: Violation of any federal, state, and local statutes and regulations related to solid waste. | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**:

**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 the 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**.

| **XX. 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 |
|---|---|---|---|---|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan?<br><br>Threshold of significance: Potential for physical changes that would create a conflict with the circulation system or an emergency responder's capability to mobilize assets as described in an adopted emergency response plan or emergency evacuation plan. | ☐ | ☐ | ☐ | ☒ |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?<br><br>Threshold of significance: Creation of a significant number of occupied dwellings, or concentration of people, within a High or Very High Fire Hazard Severity Zone. | ☐ | ☐ | ☒ | ☐ |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?<br><br>Threshold of significance: Potential for development that would require 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?<br><br>Threshold of significance: Potential for physical changes that would expose occupied dwellings or other structures to hazardous post-fire conditions. | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**:

The Humboldt County Community Wildfire Protection Plan (https://humboldtgov.org/2431/CWPP-2019) 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?<br><br>Threshold of significance: 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).<br><br>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?<br><br>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. | ☐ | ☐ | ☐ | ☒ |

**DISCUSSION**:

**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

**Attachment A**
**Mitigation Monitoring and Reporting Program**
**McKay Community Forest Trail Plan**

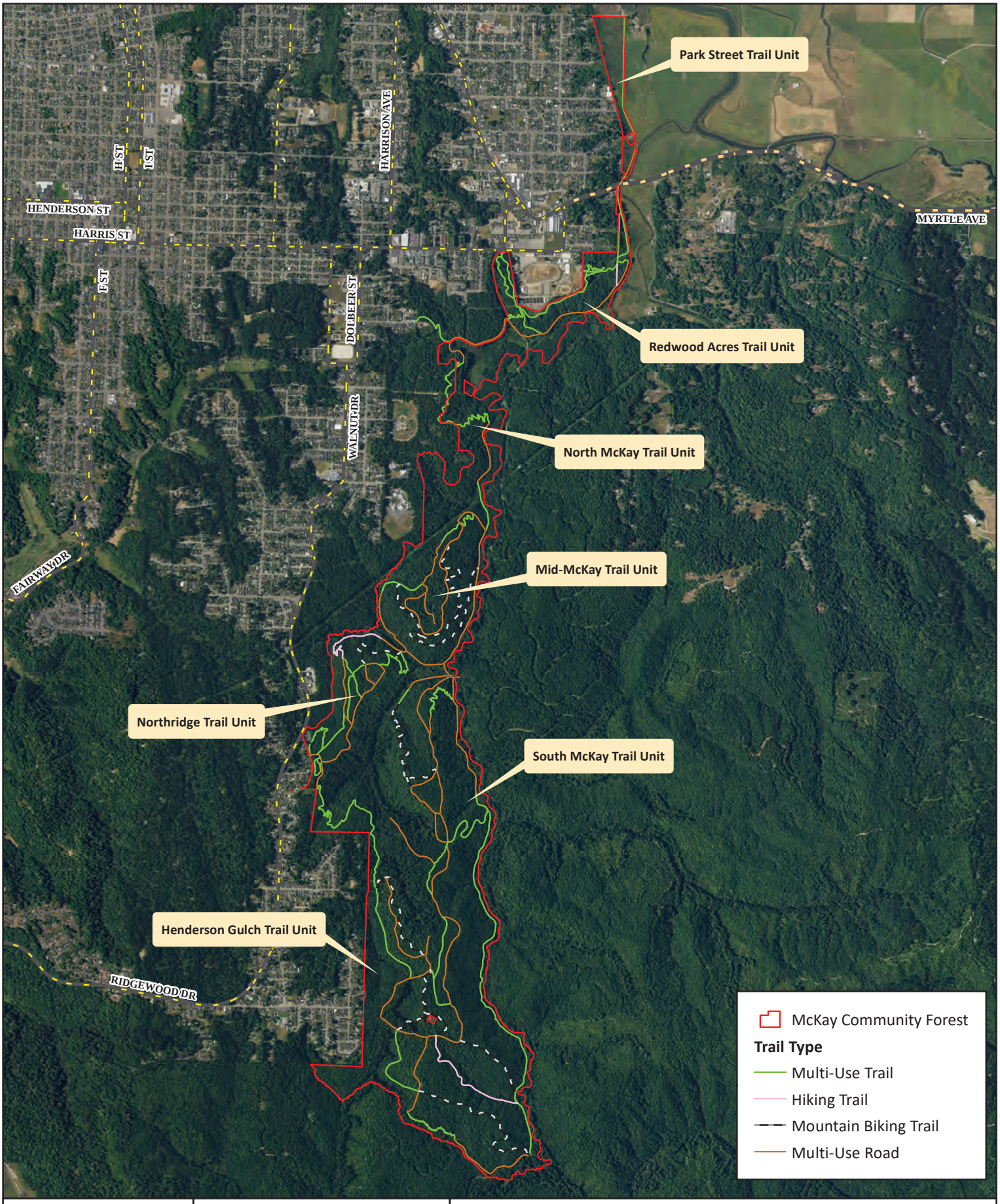
| Environmental Factor | Mitigation Measure | Implementation Responsibility | Timing |
|---|---|---|---|
| **BIO-1** | **Rare Plant Avoidance**:<br>A. Trail construction in the following trail units will be subject to rare plant avoidance measures:<br>• Mid-McKay (MM-01), Northridge (BG-01), South McKay (SM-01) – Occurrences of *Pleuropogon refractus* (nodding semaphore grass) will be flagged and either avoided or re-located.<br>• 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.<br>• 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.<br>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 un-surveyed trail segments will be performed within three years prior to construction. | Humboldt County Public Works | Part A: During trail construction<br>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) |

| | | | |
|---|---|---|---|
| | 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** | **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. | Humboldt County Public Works | Concurrent with bridge construction |
| **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:<br>A. Wetlands near proposed trail alignments will be delineated and flagged.<br>B. The trail will be routed to avoid wetlands to the greatest extent practicable.<br>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. | Humboldt County Public Works | Parts A and B: prior to trail construction<br><br>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 |

| | | | |
|---|---|---|---|
| **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. | Humboldt County Public Works | During trail construction |
| **HYD-1** | **Controllable Sediment Discharge Sources:** The project includes treatments of Controllable Sediment Discharge Sources as listed in Attachment E of the Initial Study/Mitigated Negative Declaration. | Humboldt County Public Works | During trail construction, except for specified sources in sensitive areas which will be prioritized |
| **HYD-2** | **Stormwater Pollution Prevention Plan:** Construction practices will utilize BMPs identified in a SWPPP to avoid or minimize the potential for erosion and sediment delivery. | Humboldt County Public Works | During trail construction |
| **HYD-3** | **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. | Humboldt County Public Works | April-October (annually) |
| **HYD-4** | **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** | **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. | Humboldt County Public Works | Prior to construction of trail segment NM-04 |

**ATTACHMENT B**

**Trail Maps**




0 1,500 3,000 Feet

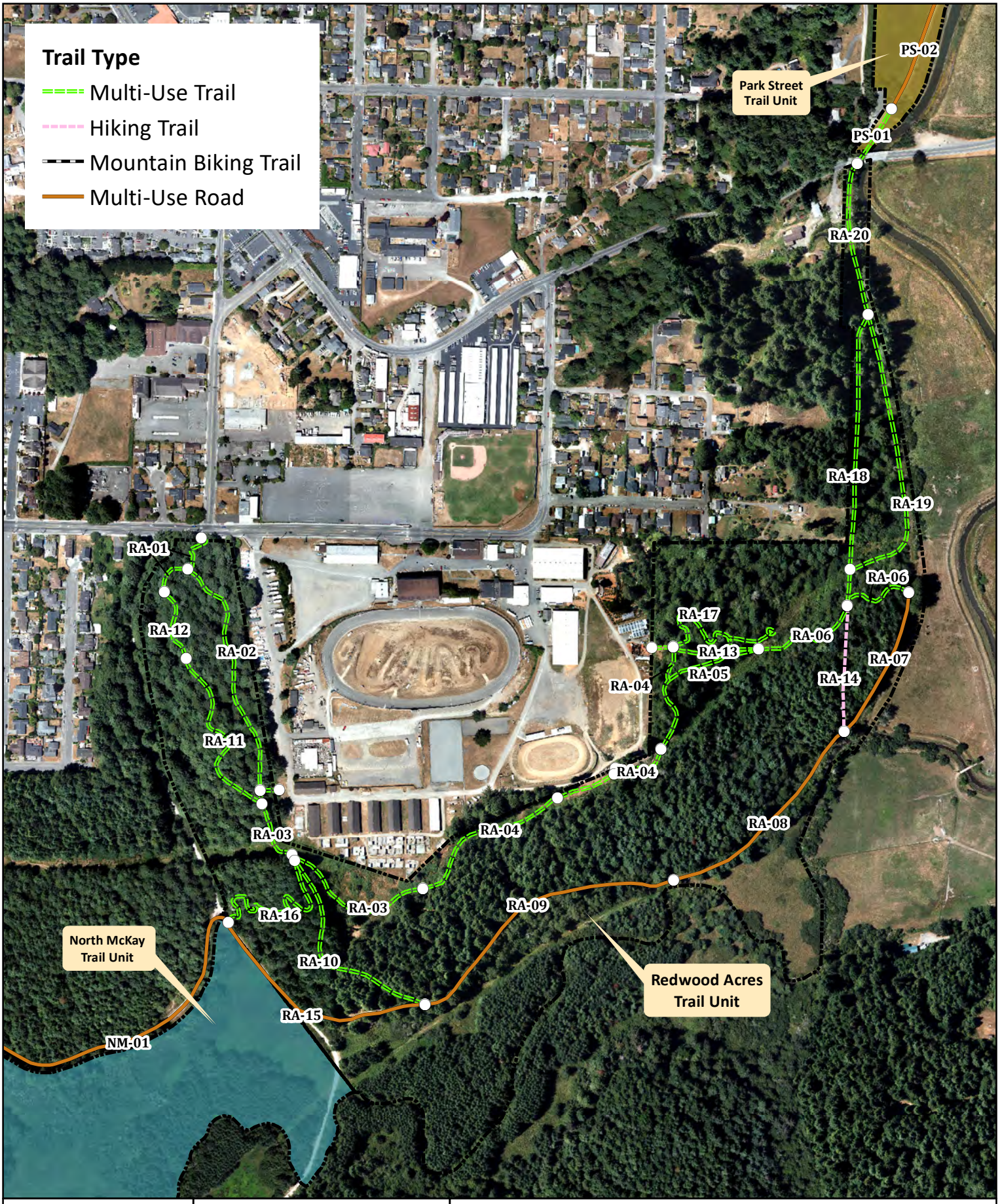
N W E S

Imagery: 2020 NAIP
Printed: June 24, 2021
Humboldt County Public Works

# McKay Community Forest

## Proposed Trail System

## Map 4-2



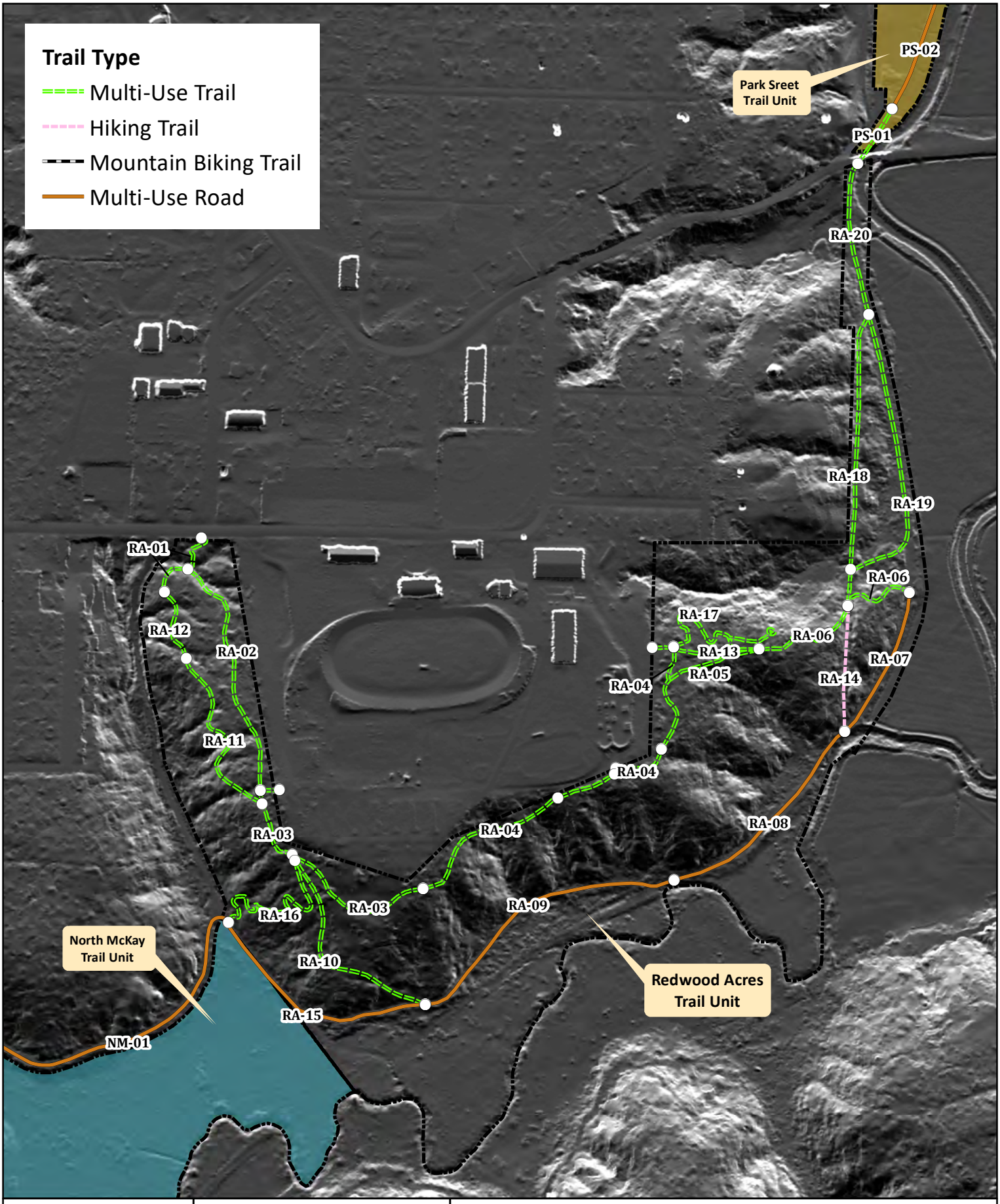

0 250 500 Feet

Imagery: Access Geographic 2019
Printed: December 10, 2020
Humboldt County Public Works

# McKay Community Forest

## Redwood Acres Trail

**Map 4-3**
Aerial



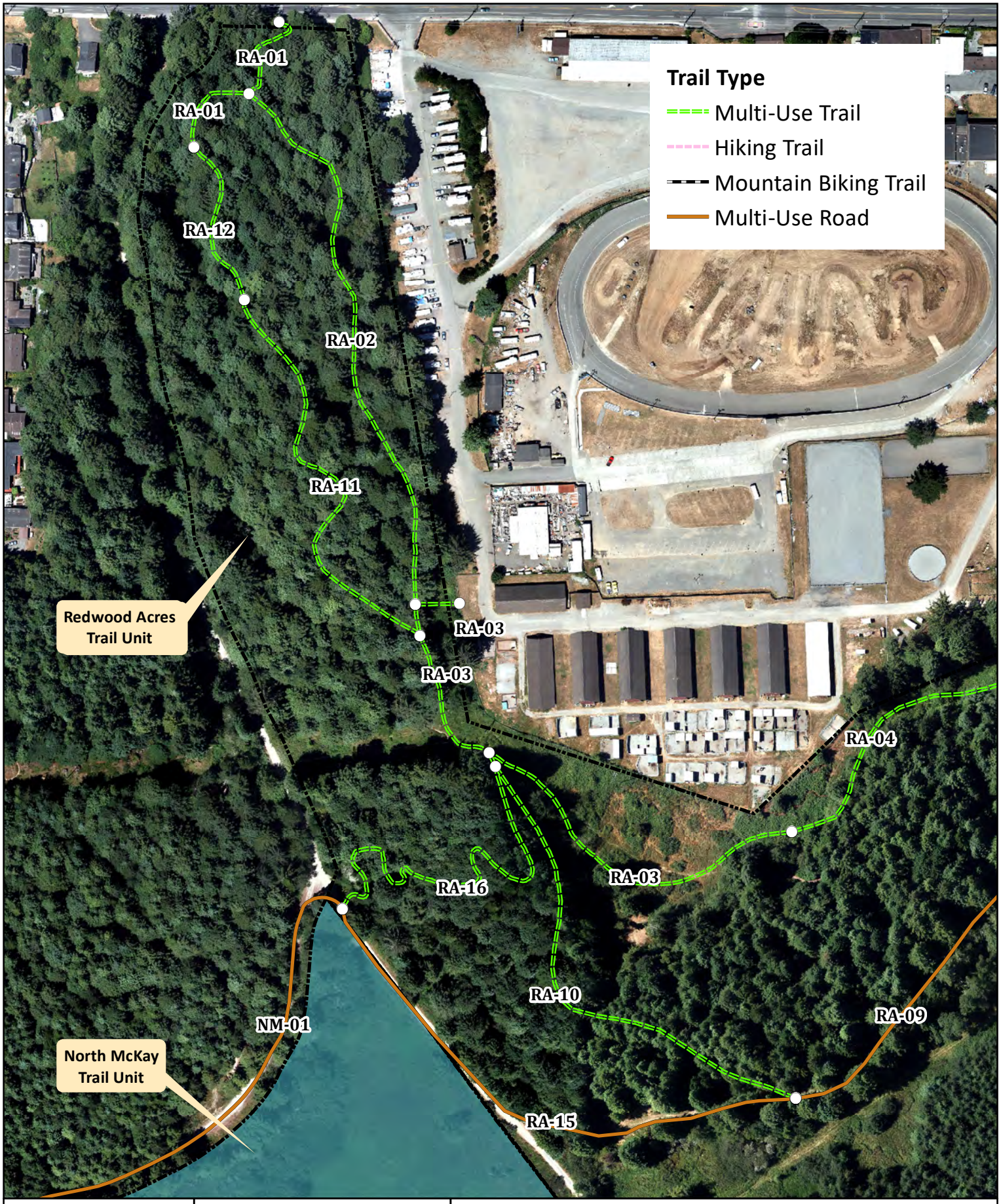

0 250 500 Feet

Imagery: LiDAR Hillshade
Printed: December 10, 2020
Humboldt County Public Works

# McKay Community Forest

## Redwood Acres Trail

**Map 4-3**
LiDAR



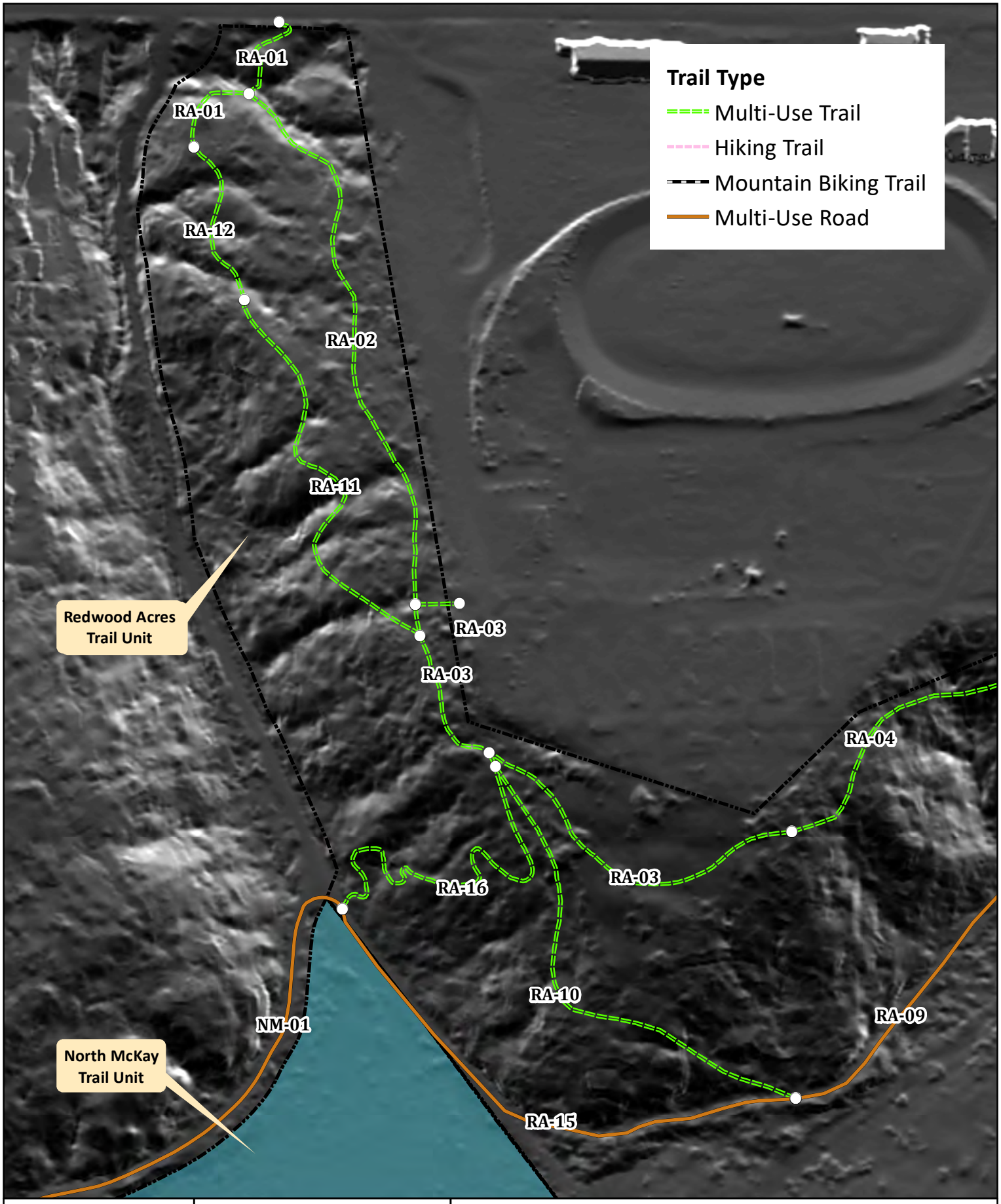

0 100 200 Feet

Imagery: Access Geographic 2019
Printed: December 10, 2020
Humboldt County Public Works

# McKay Community Forest

## Redwood Acres Trail (West Side)

**Map 4-4**
Aerial



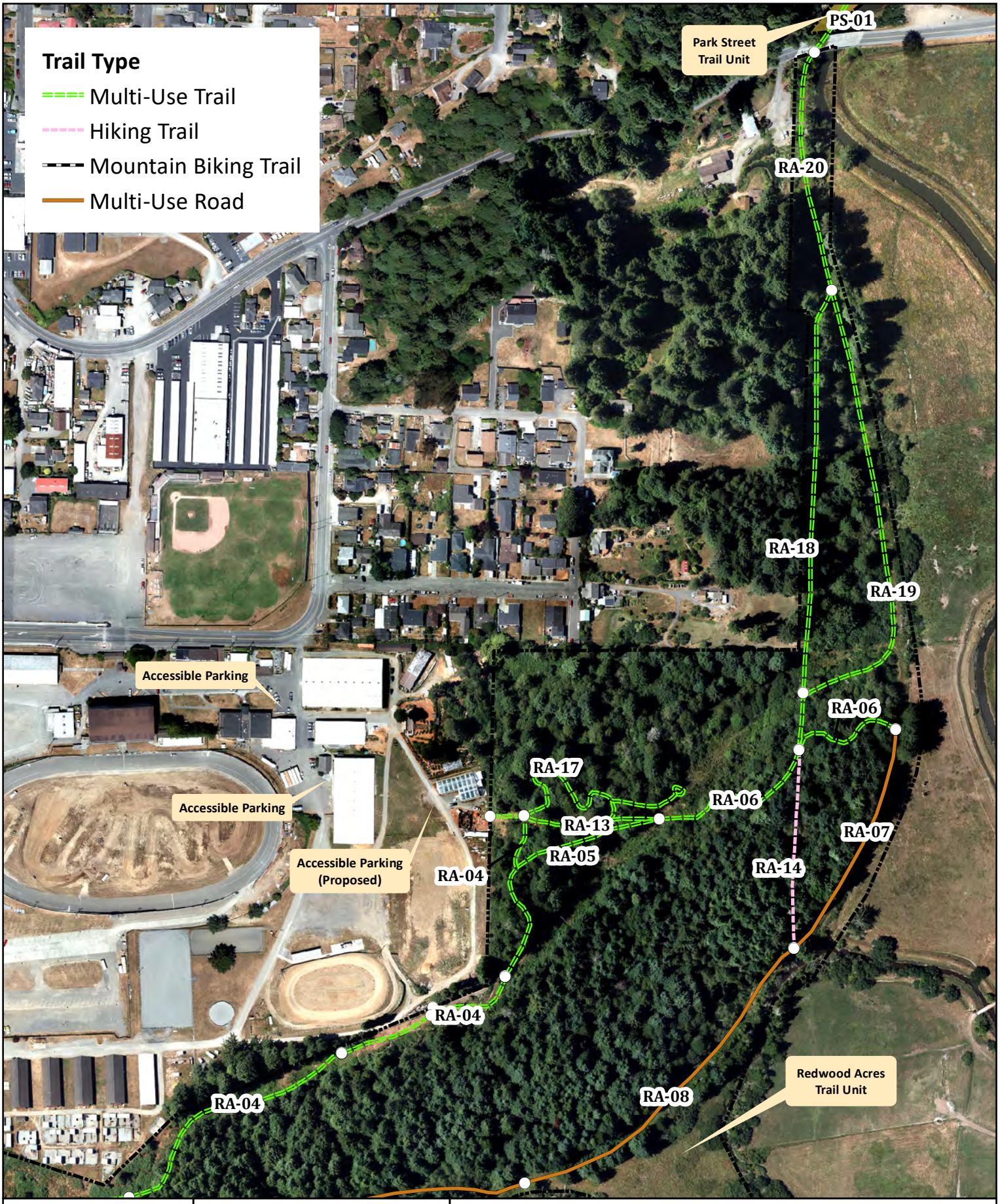

0 100 200 Feet

Imagery: LiDAR Hillshade
Printed: December 10, 2020
Humboldt County Public Works

# McKay Community Forest

## Redwood Acres Trail (West Side)

**Map 4-4**
LiDAR



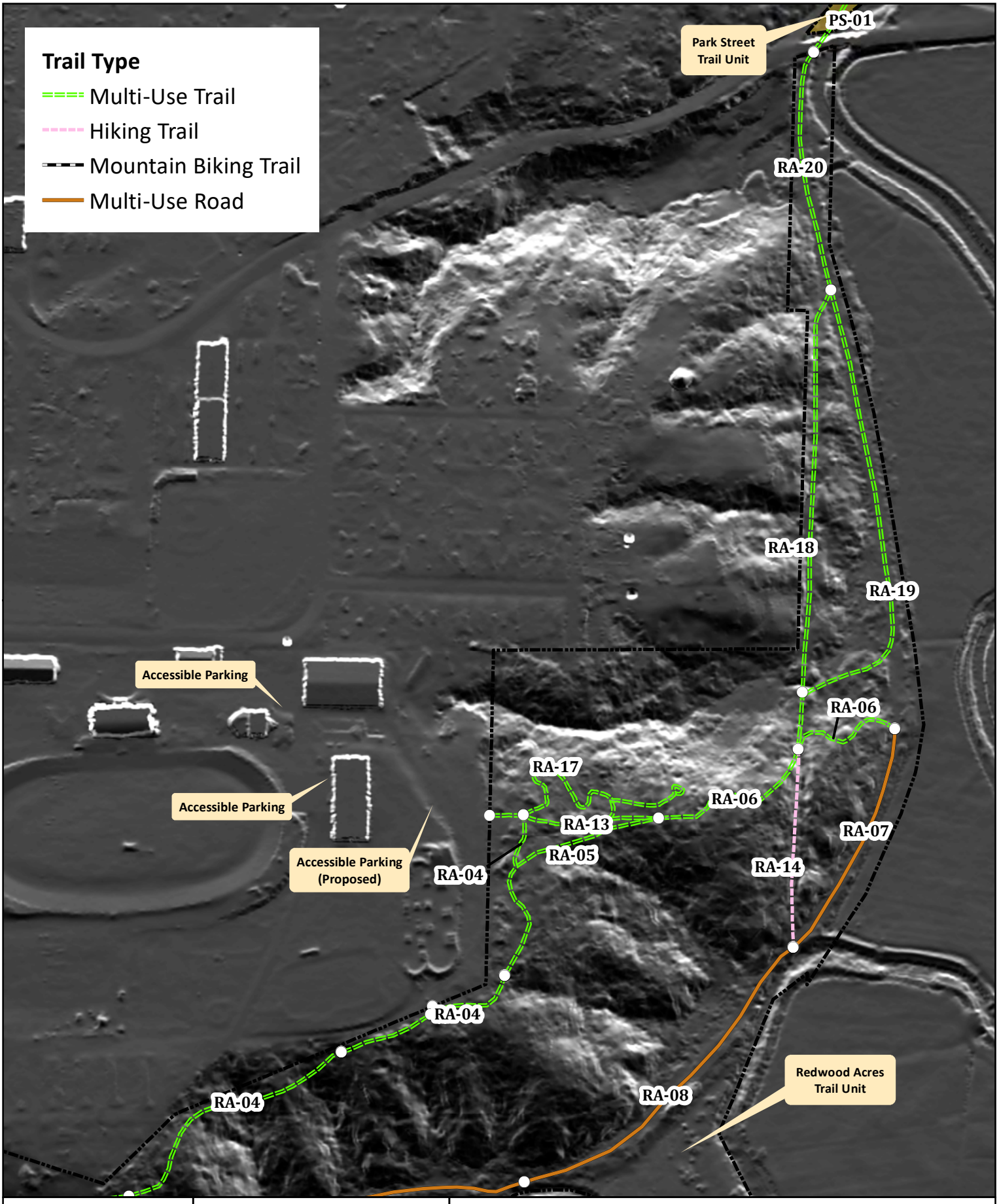

0 150 300 Feet

Imagery: Access Geographic 2019
Printed: December 10, 2020
Humboldt County Public Works

# McKay Community Forest

## Redwood Acres Trail (East Side)

**Map 4-5**
Aerial




0 150 300 Feet

Imagery: LiDAR Hillshade
Printed: December 10, 2020
Humboldt County Public Works

# McKay Community Forest

## Redwood Acres Trail (East Side)

**Map 4-5**
LiDAR

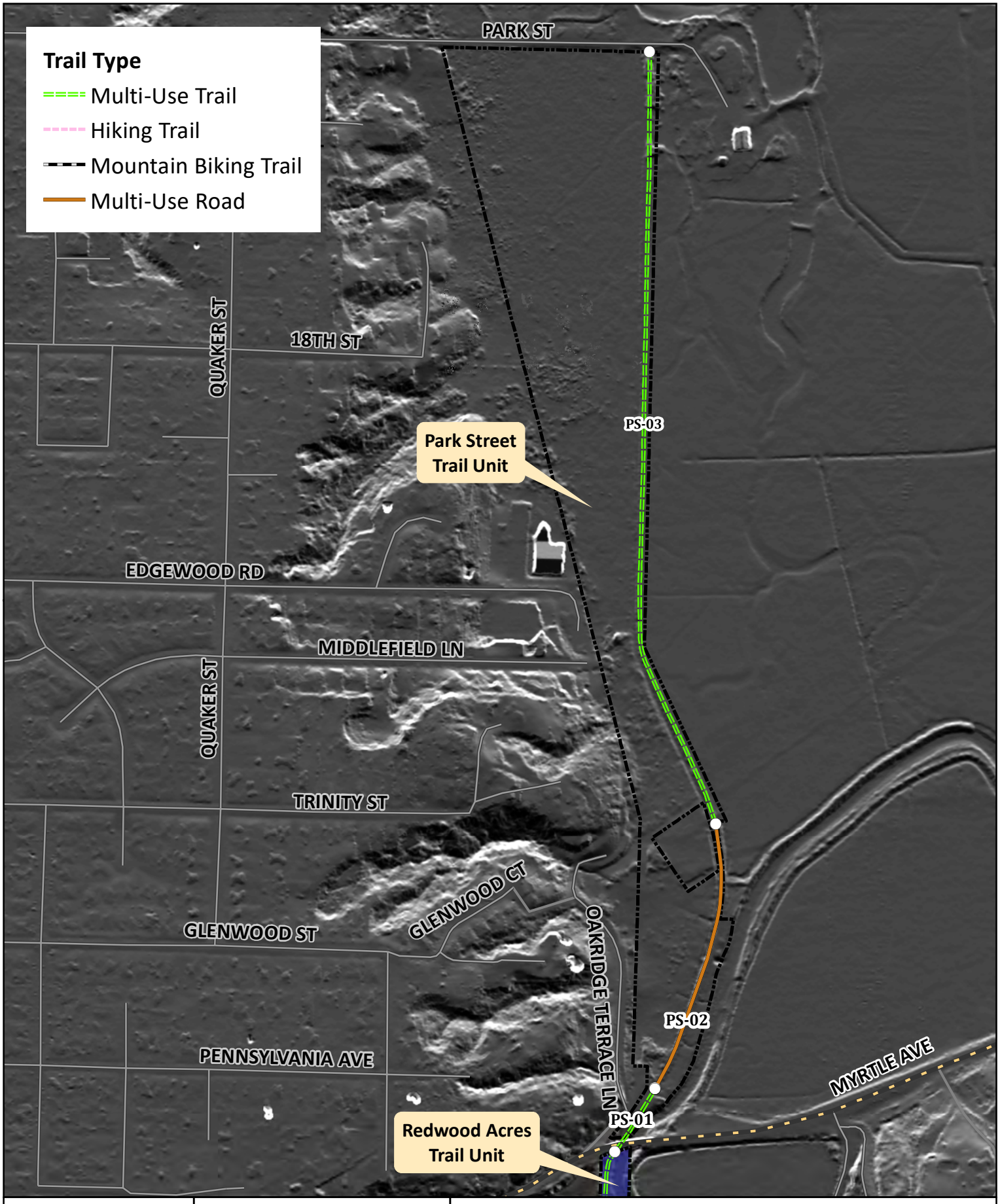

0 200 400 Feet

Imagery: Access Geographic 2019
Printed: December 10, 2020
Humboldt County Public Works

# McKay Community Forest

## Park Street Trail

**Map 4-6**
Aerial




0 200 400 Feet

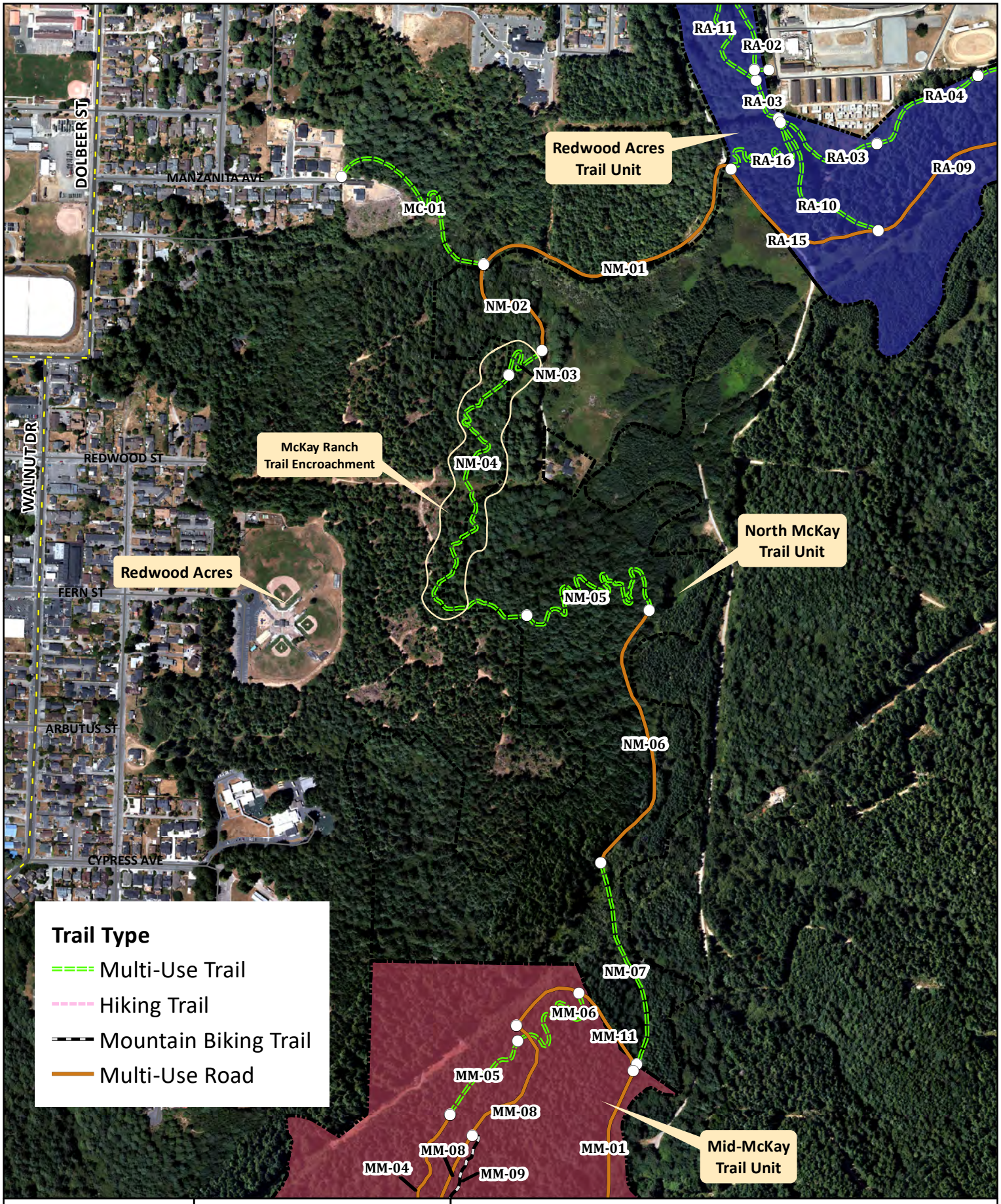
Imagery: LiDAR Hillshade
Printed: December 10, 2020
Humboldt County Public Works

N W E S

# McKay Community Forest

## Park Street Trail

**Map 4-6**
LiDAR




0 375 750 Feet

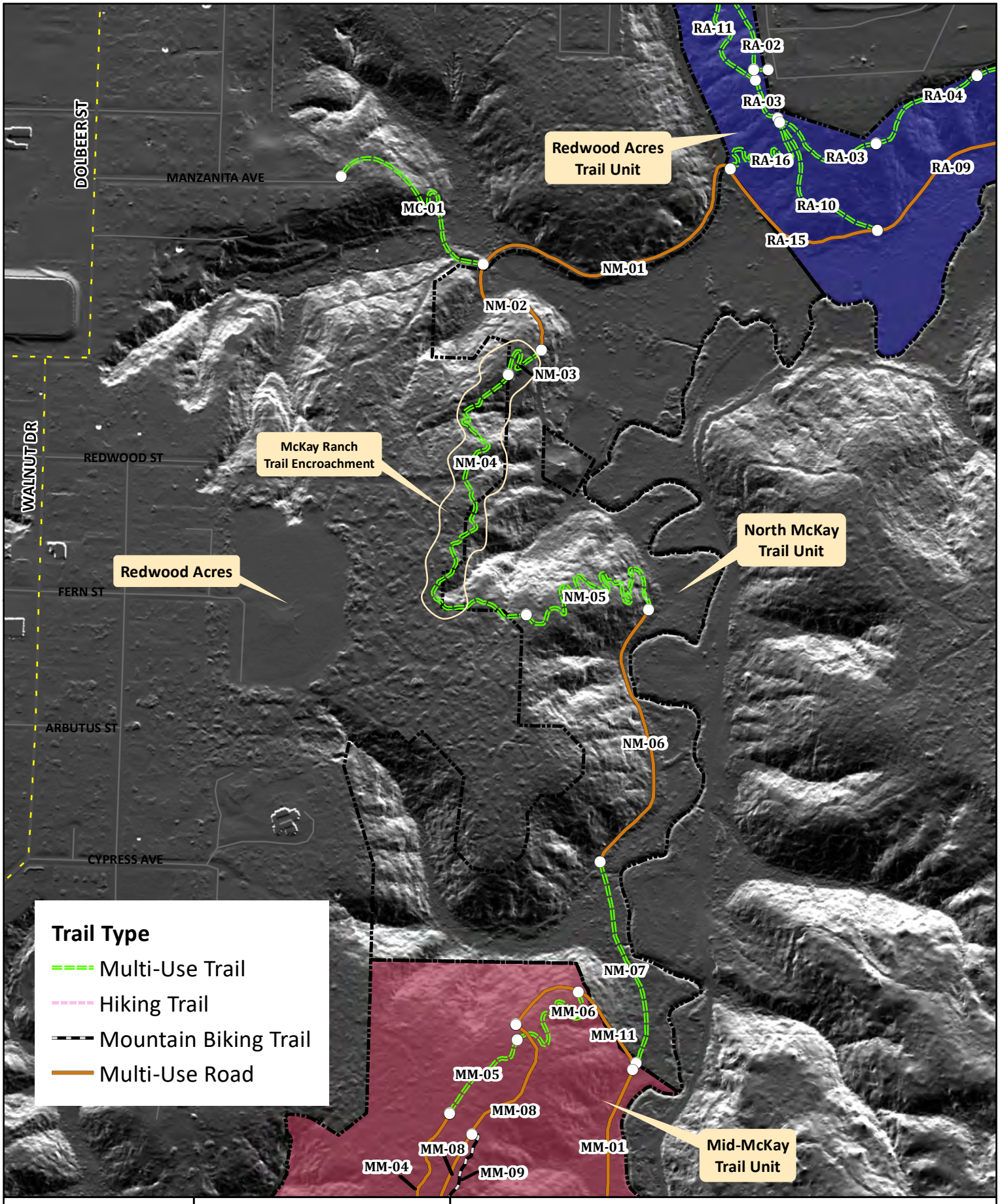
N W E S

Imagery: Access Geographic 2019
Printed: December 14, 2020
Humboldt County Public Works

# McKay Community Forest

## North McKay Trail

**Map 4-7**
Aerial



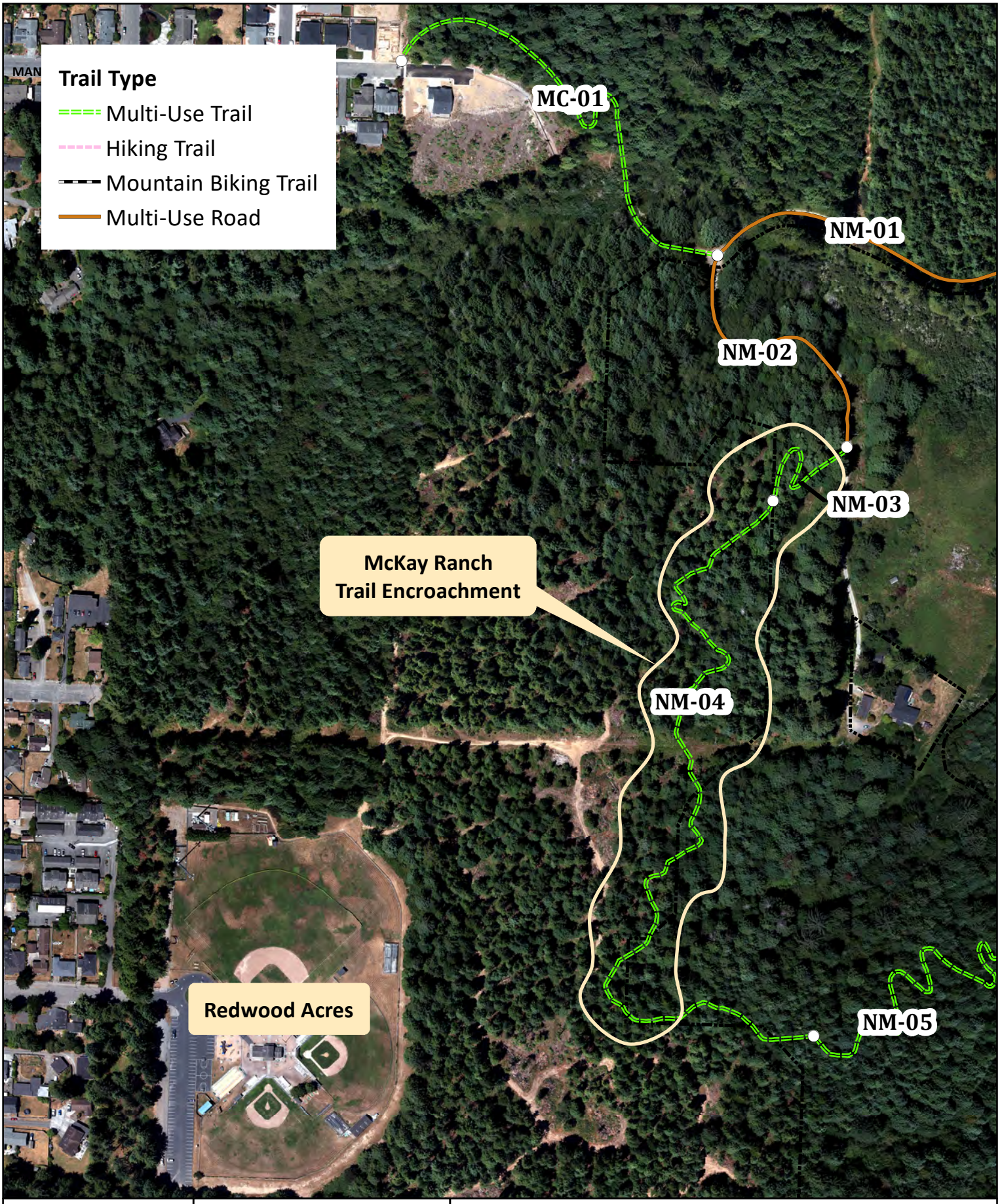

0 375 750 Feet

Imagery: LiDAR Hillshade
Printed: December 14, 2020
Humboldt County Public Works

# McKay Community Forest

## North McKay Trail

**Map 4-7**
LiDAR




0 150 300 Feet

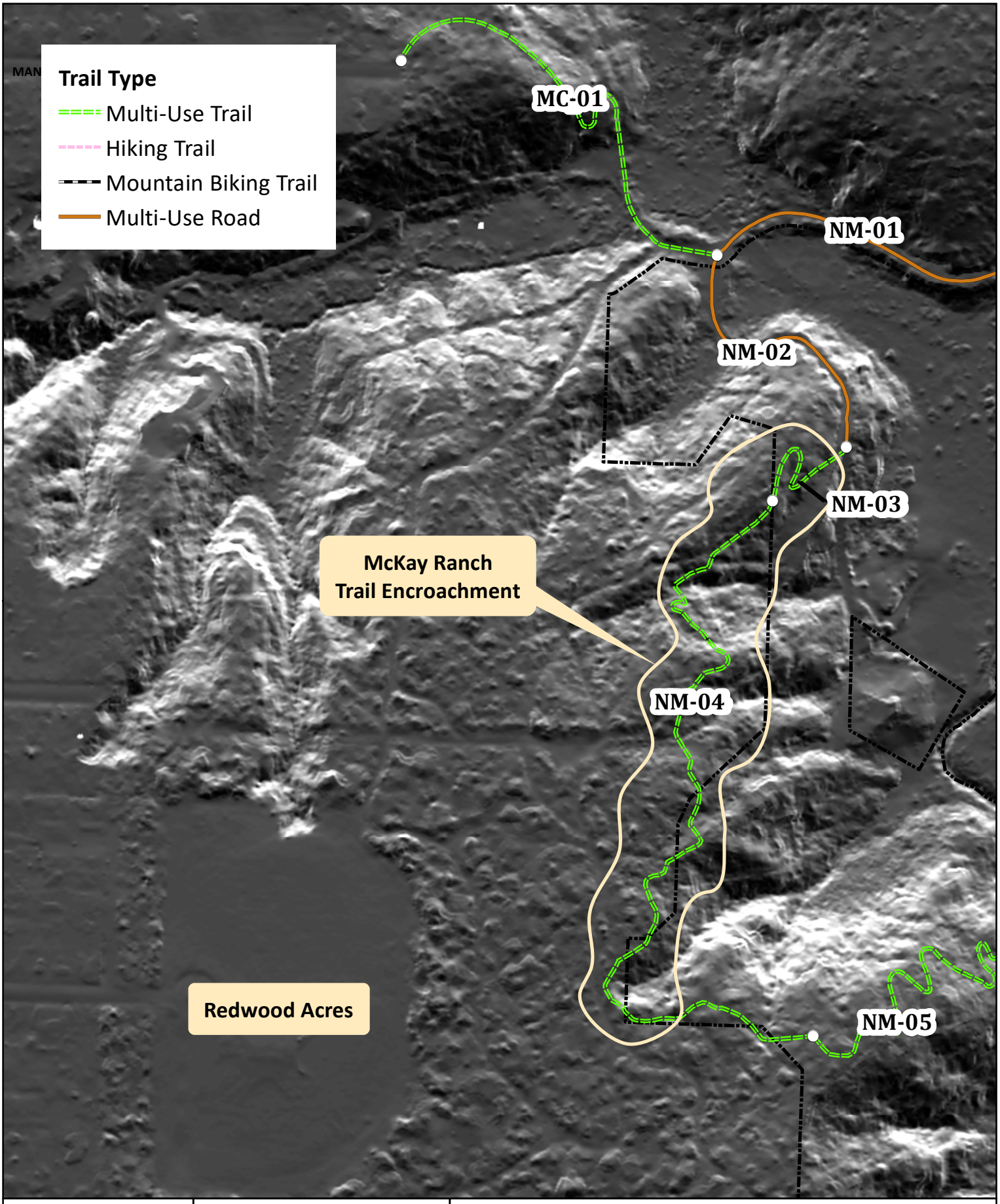
Imagery: Access Geographic 2019
Printed: December 10, 2020
Humboldt County Public Works

N
W E
S

# McKay Community Forest

## Proposed McKay Ranch Trail Encroachment

**Map 4-8**
Aerial



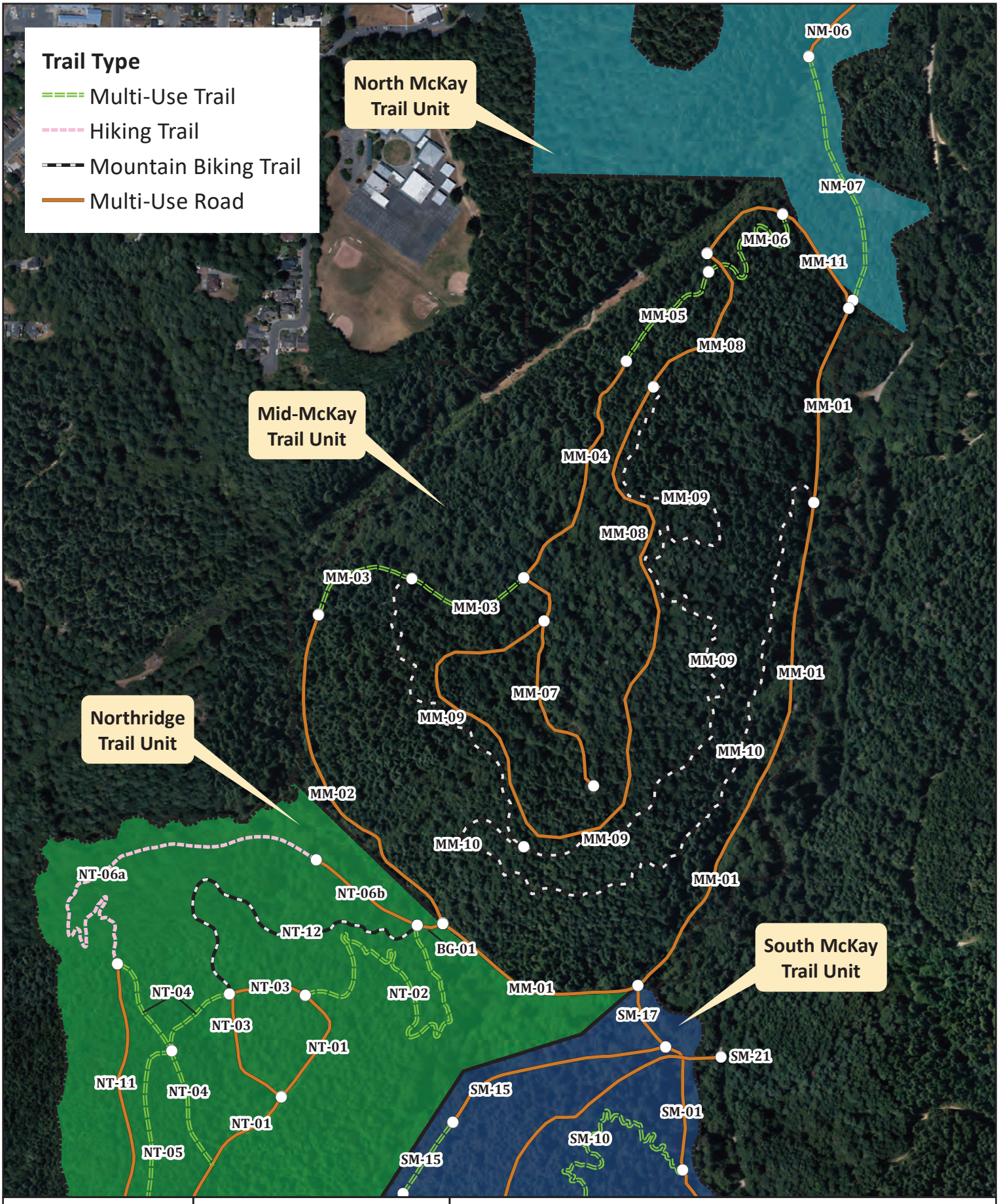

0 150 300 Feet

Imagery: LiDAR Hillshade
Printed: December 10, 2020
Humboldt County Public Works

# McKay Community Forest

## Proposed McKay Ranch Trail Encroachment

**Map 4-8**
LiDAR



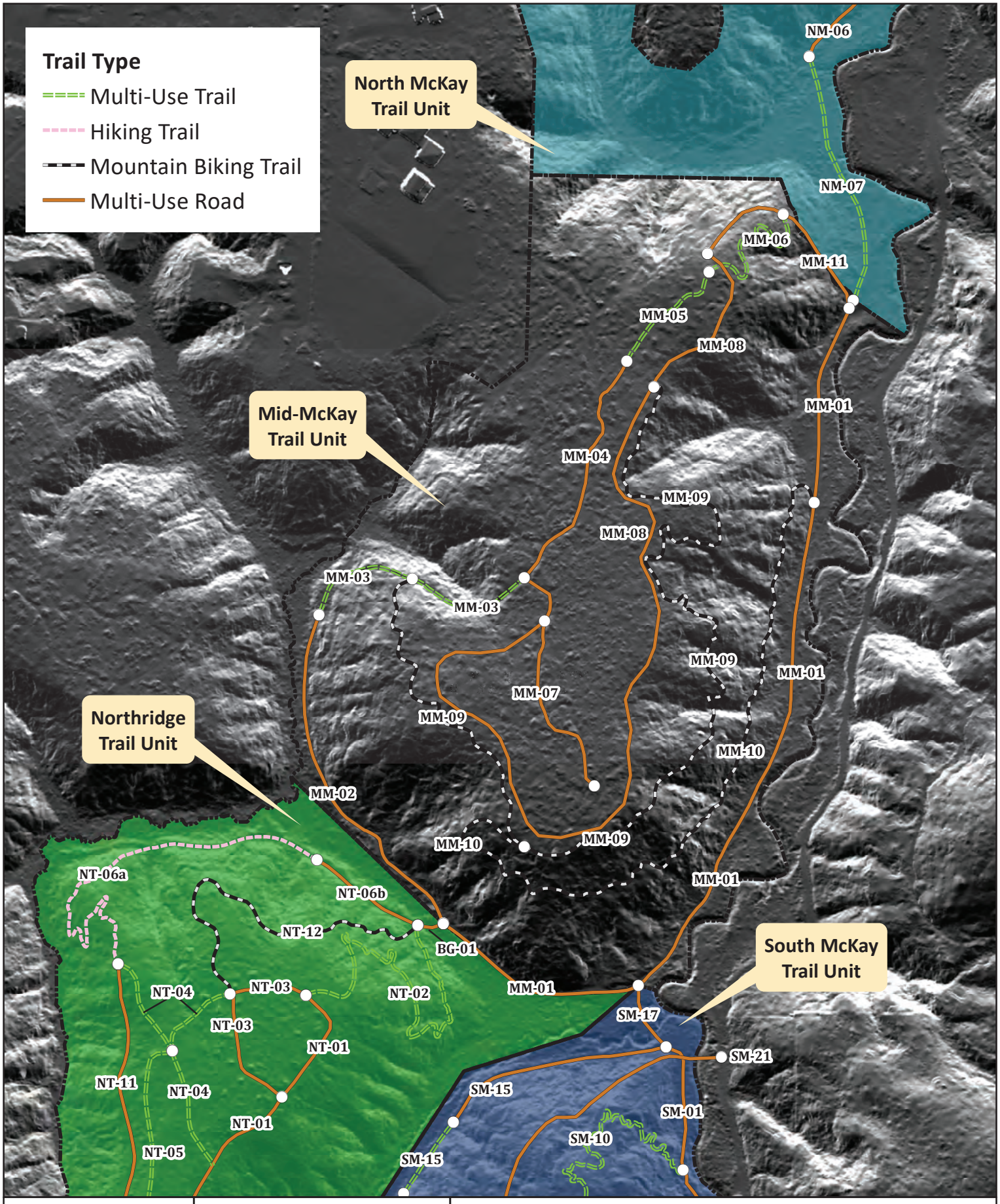

0 250 500 Feet

Imagery: Access Geographic 2019
Printed: June 24, 2021
Humboldt County Public Works

# McKay Community Forest

## Mid-McKay Trail

**Map 4-9**
Aerial



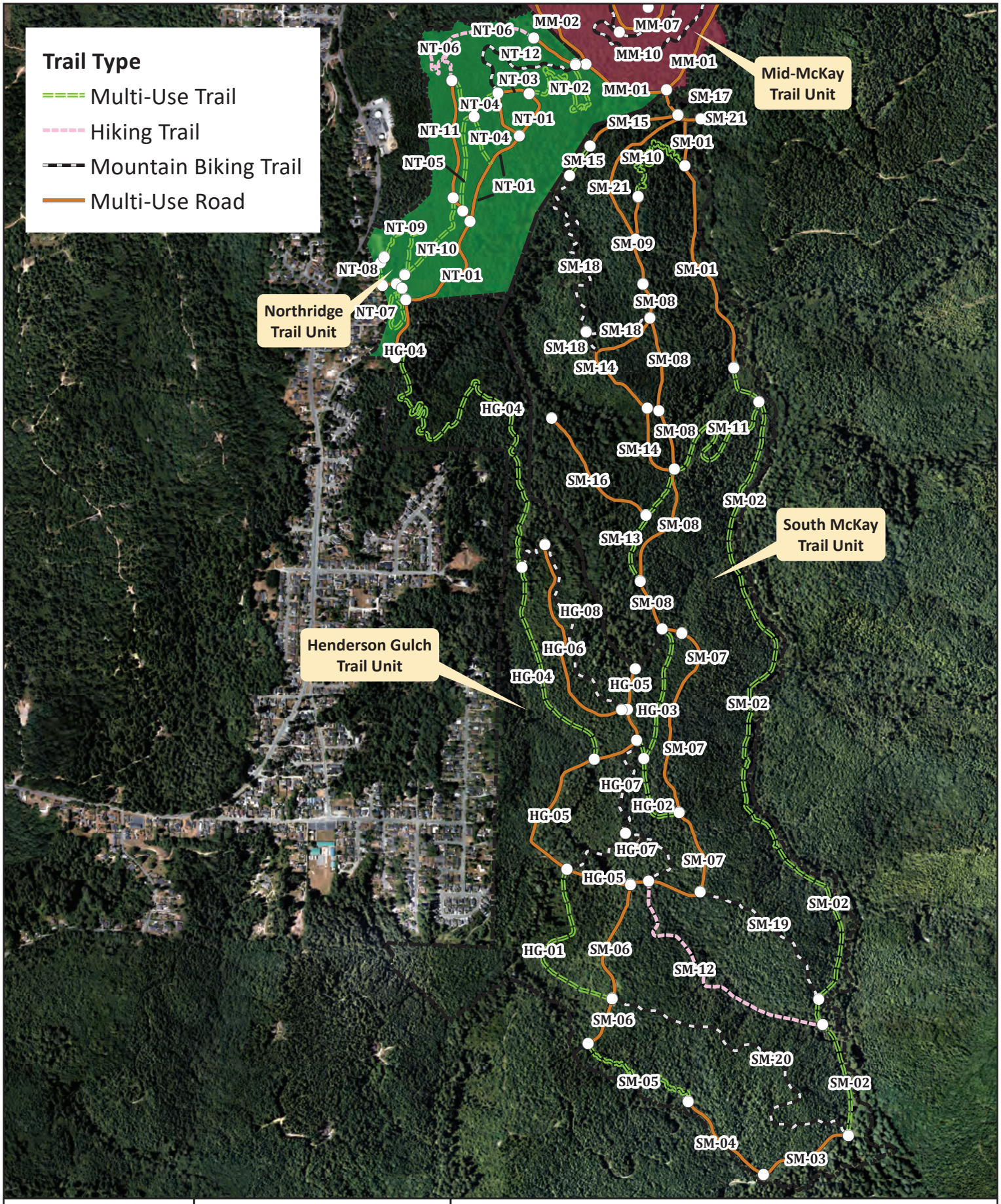

0 250 500 Feet

Imagery: LiDAR Hillshade
Printed: June 24, 2021
Humboldt County Public Works

# McKay Community Forest

## Mid-McKay Trail

**Map 4-9**
LiDAR



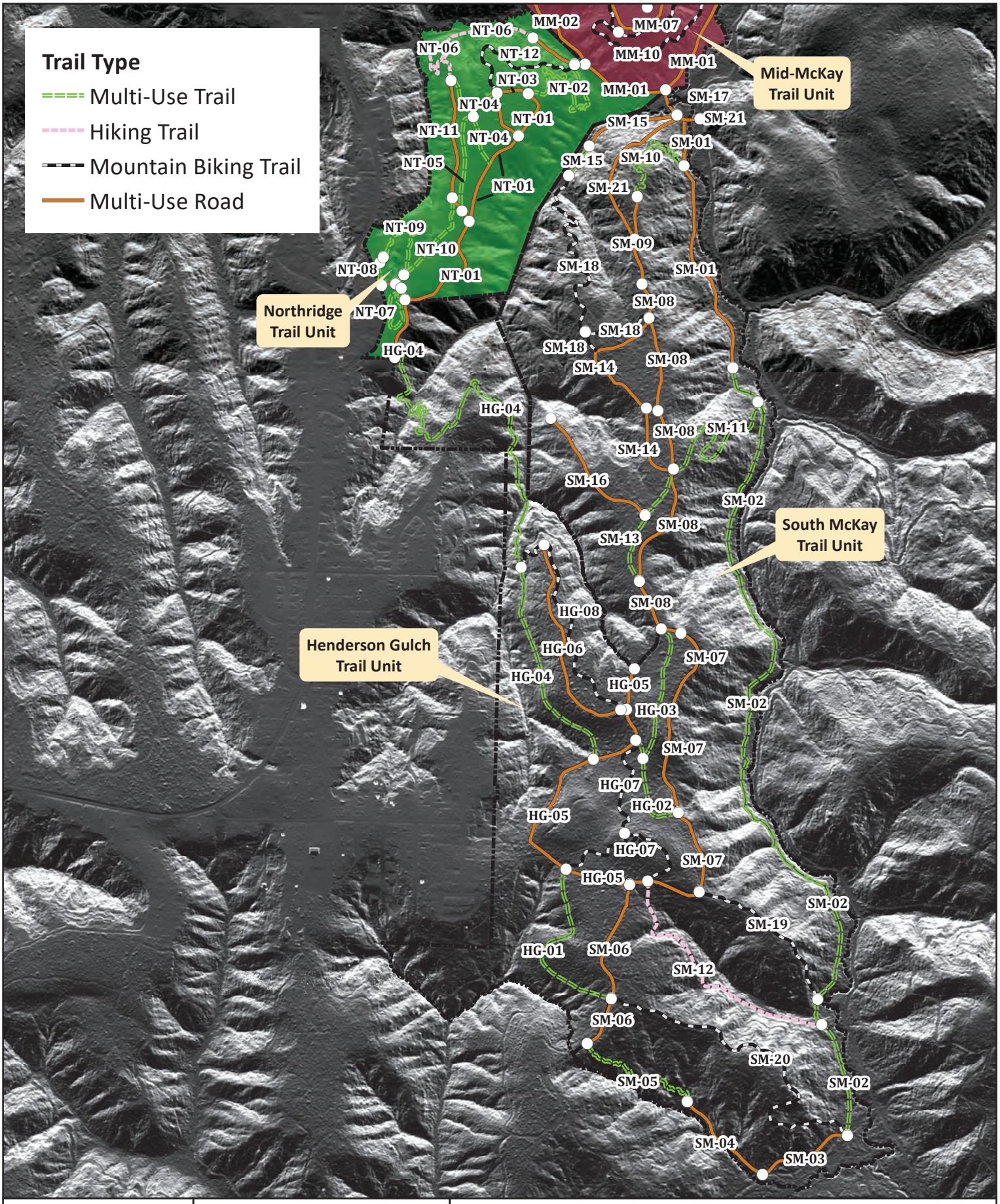



Imagery: Access Geographic 2019
Printed: June 24, 2021
Humboldt County Public Works

# McKay Community Forest

## South McKay and Henderson Gulch Trails

**Map 4-10**
Aerial




0 750 1,500 Feet

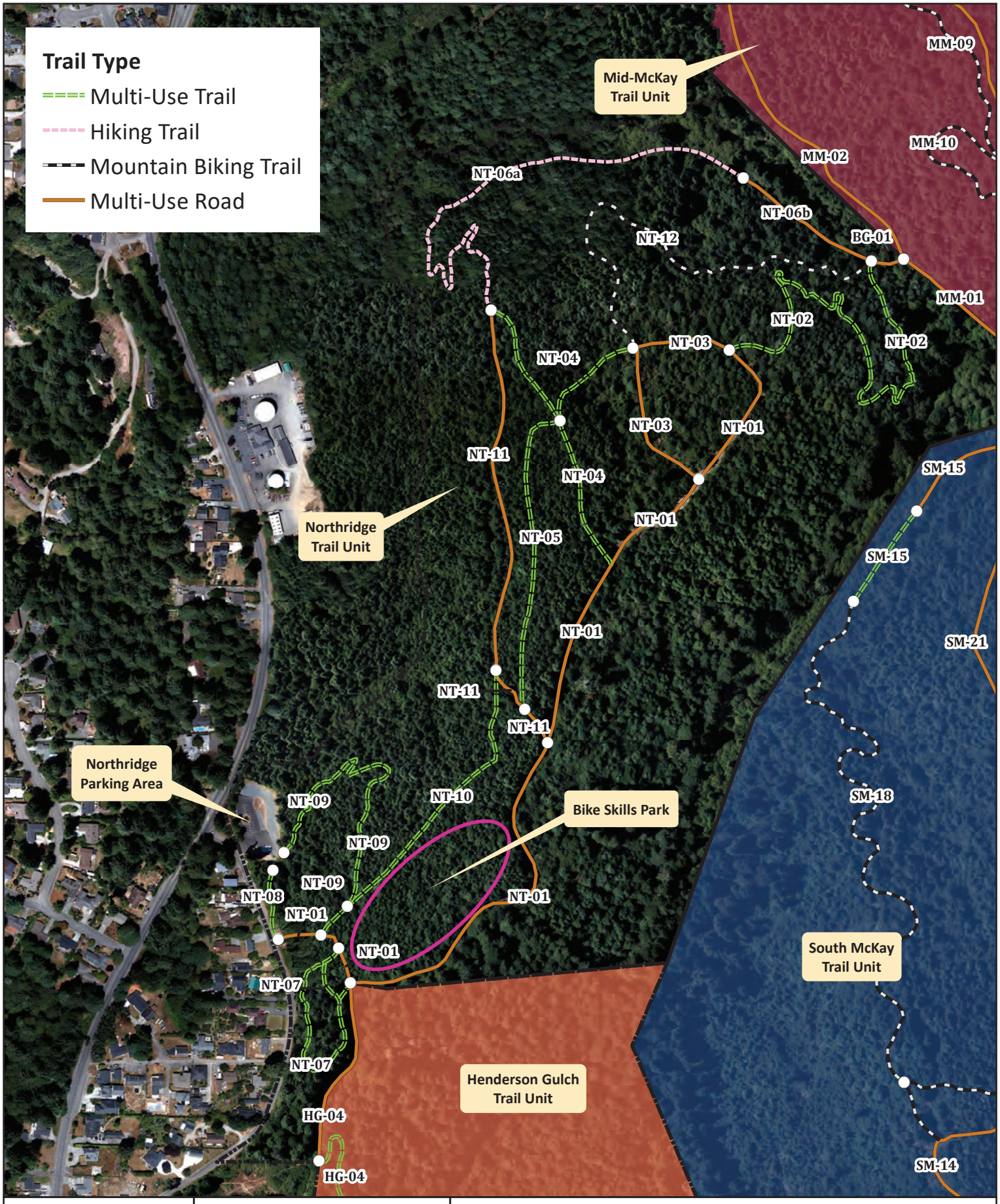
N W E S

Imagery: LiDAR Hillshade
Printed: June 24, 2021
Humboldt County Public Works

# McKay Community Forest

## South McKay and Henderson Gulch Trails

**Map 4-10**
LiDAR



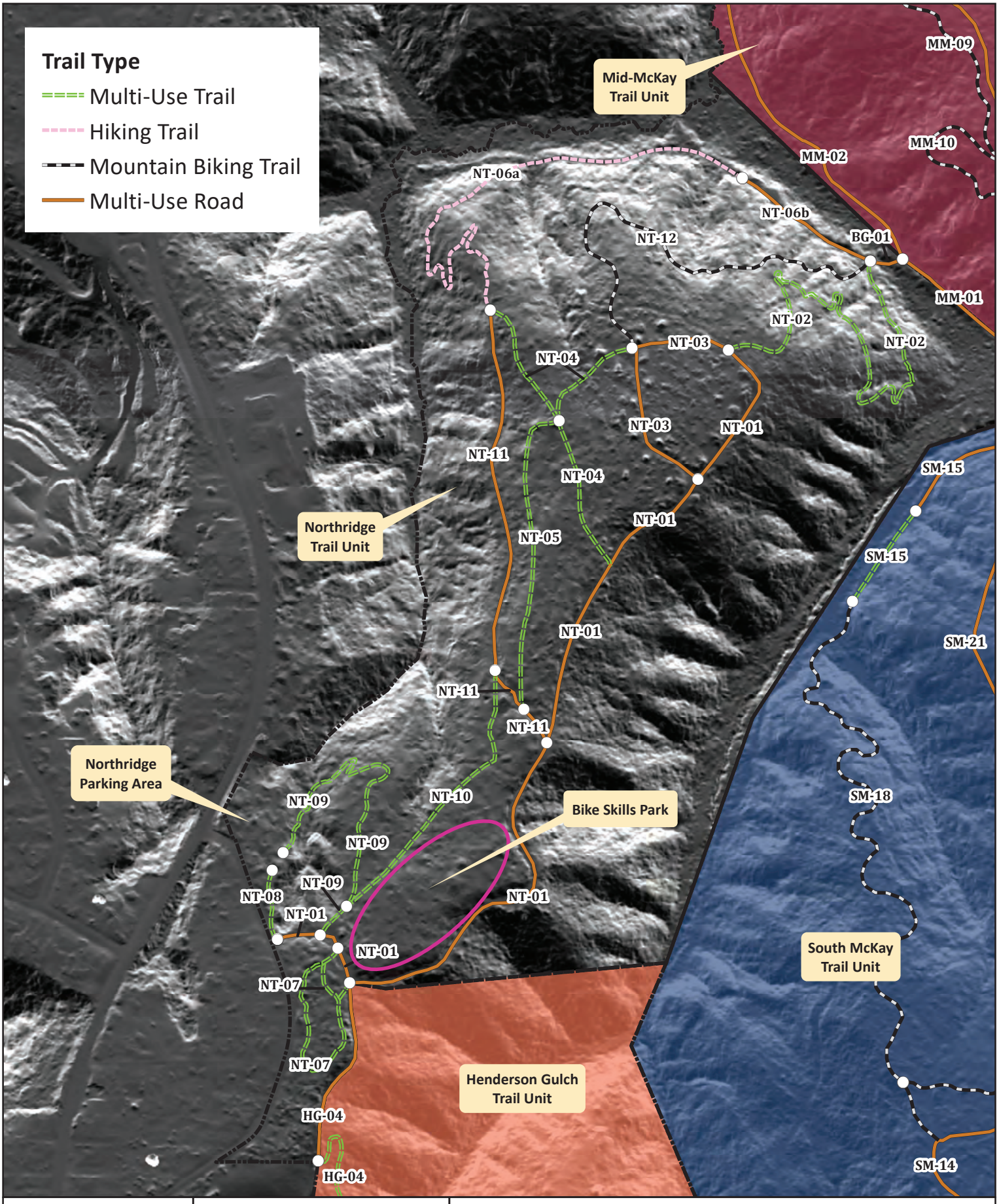

0 200 400 Feet

Imagery: Access Geographic 2019
Printed: June 24, 2021
Humboldt County Public Works

# McKay Community Forest

## Northridge Trail

**Map 4-11**
Aerial



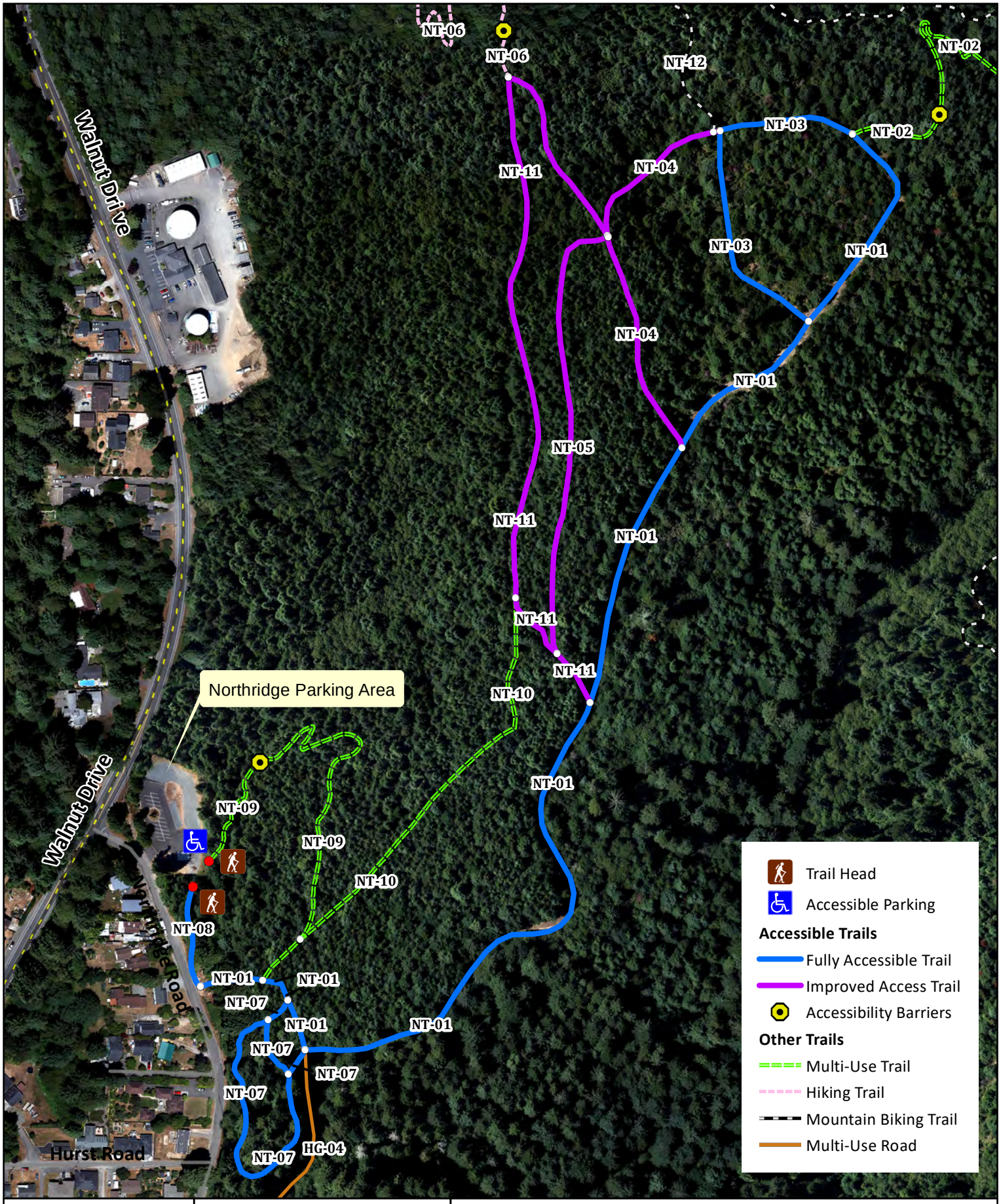

0 200 400 Feet

Imagery: LiDAR Hillshade
Printed: June 24, 2021
Humboldt County Public Works

# McKay Community Forest

## Northridge Trail

**Map 4-11**
LiDAR



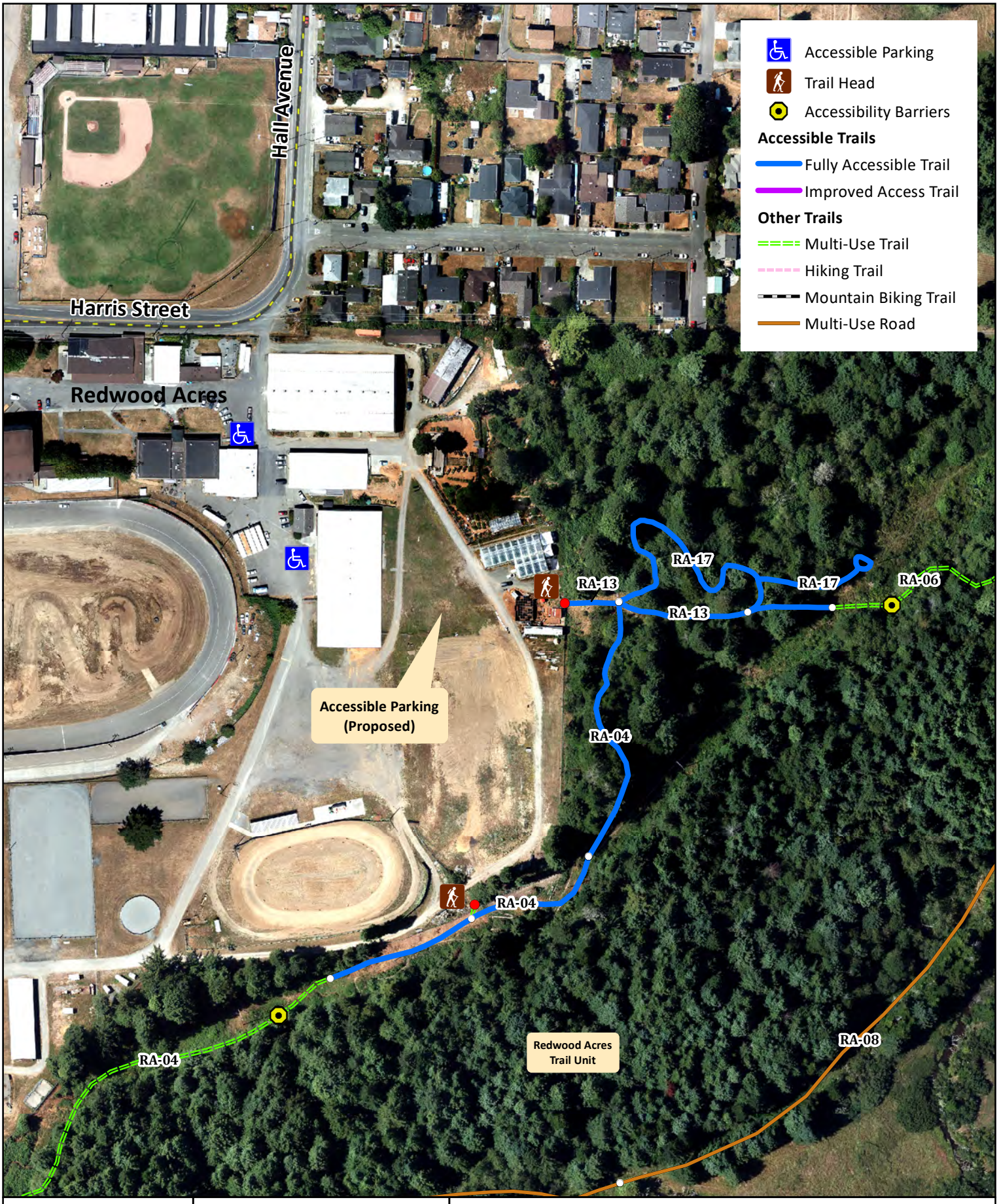

0 150 300 Feet

Imagery: Access Geographic 2019
Printed: December 10, 2020
Humboldt County Public Works

# McKay Community Forest

## Accessible Trails - Northridge

## Map 4-12




0 100 200 Feet

Imagery: Access Geographic 2019
Printed: December 10, 2020
Humboldt County Public Works

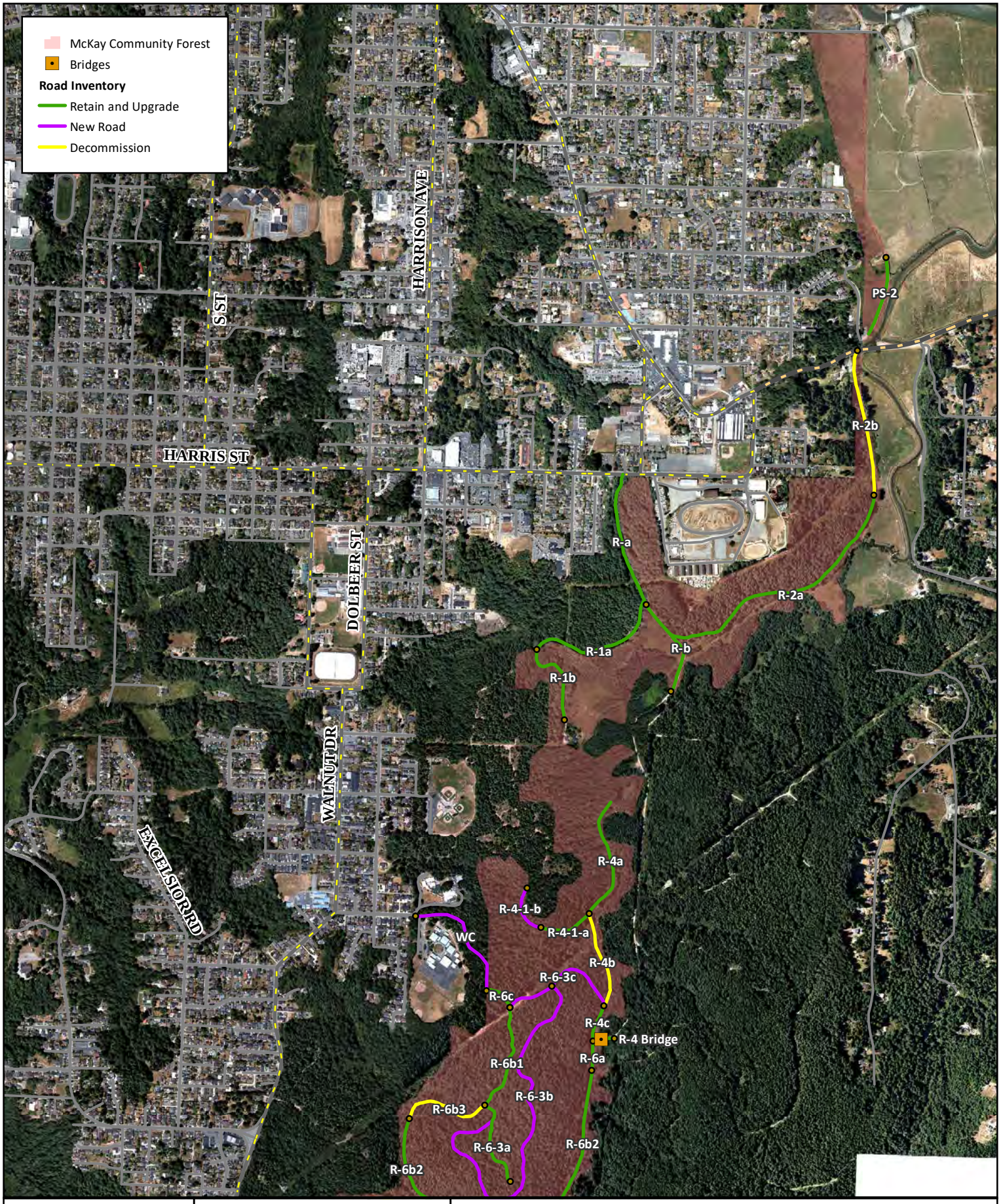
# McKay Community Forest

## Accessible Trails - Redwood Acres

## Map 4-13

# ATTACHMENT C

## Transportation System Maps



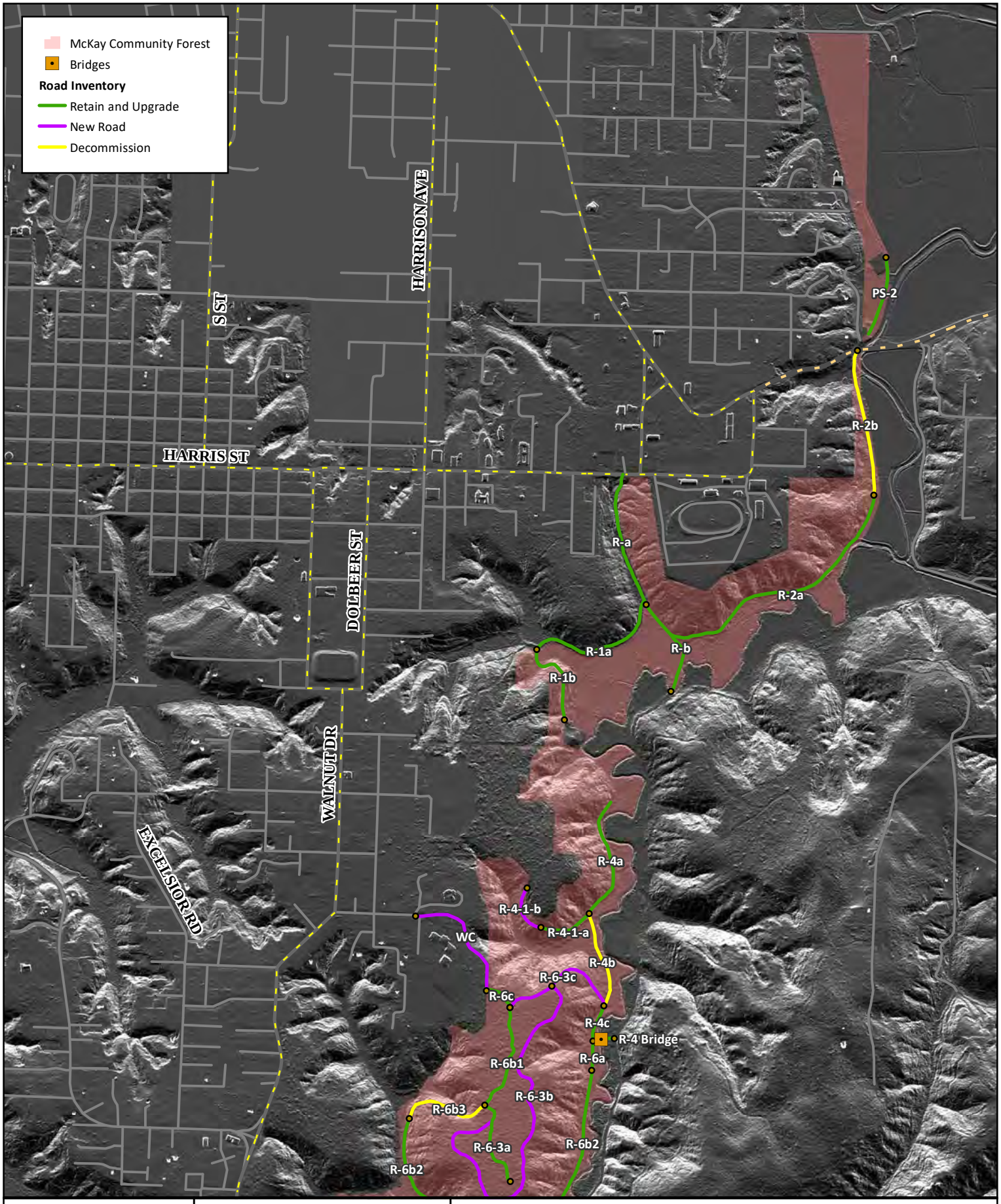

0 750 1,500 Feet

Imagery: Access Geographic 2019
Printed: June 24, 2021
Humboldt County Public Works

# McKay Community Forest

## Proposed Road System - North

**Map 1-12**
Aerial



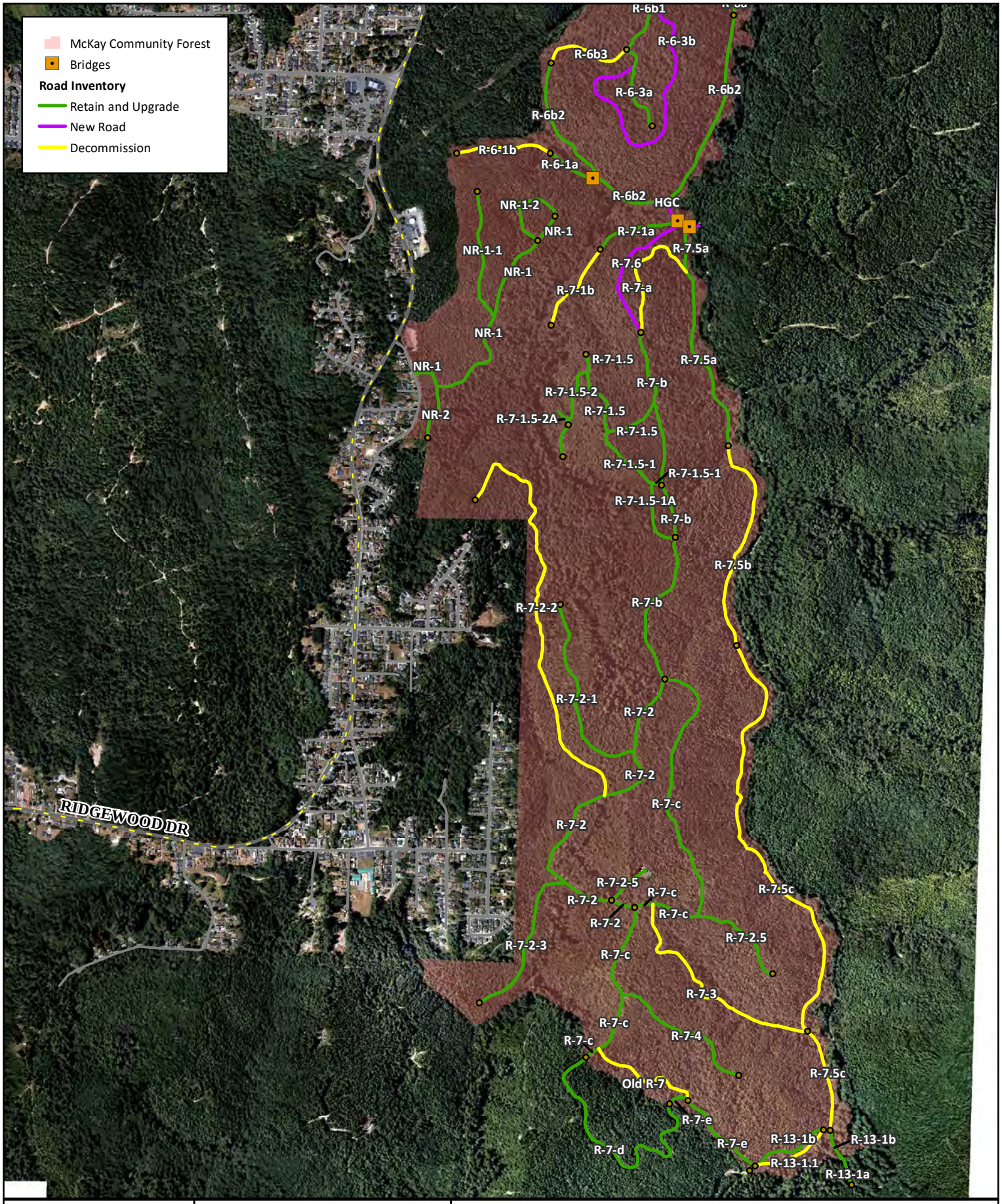

0 750 1,500 Feet

Imagery: LiDAR Hillshade
Printed: June 24, 2021
Humboldt County Public Works

# McKay Community Forest

## Proposed Road System - North

**Map 1-12**
LiDAR



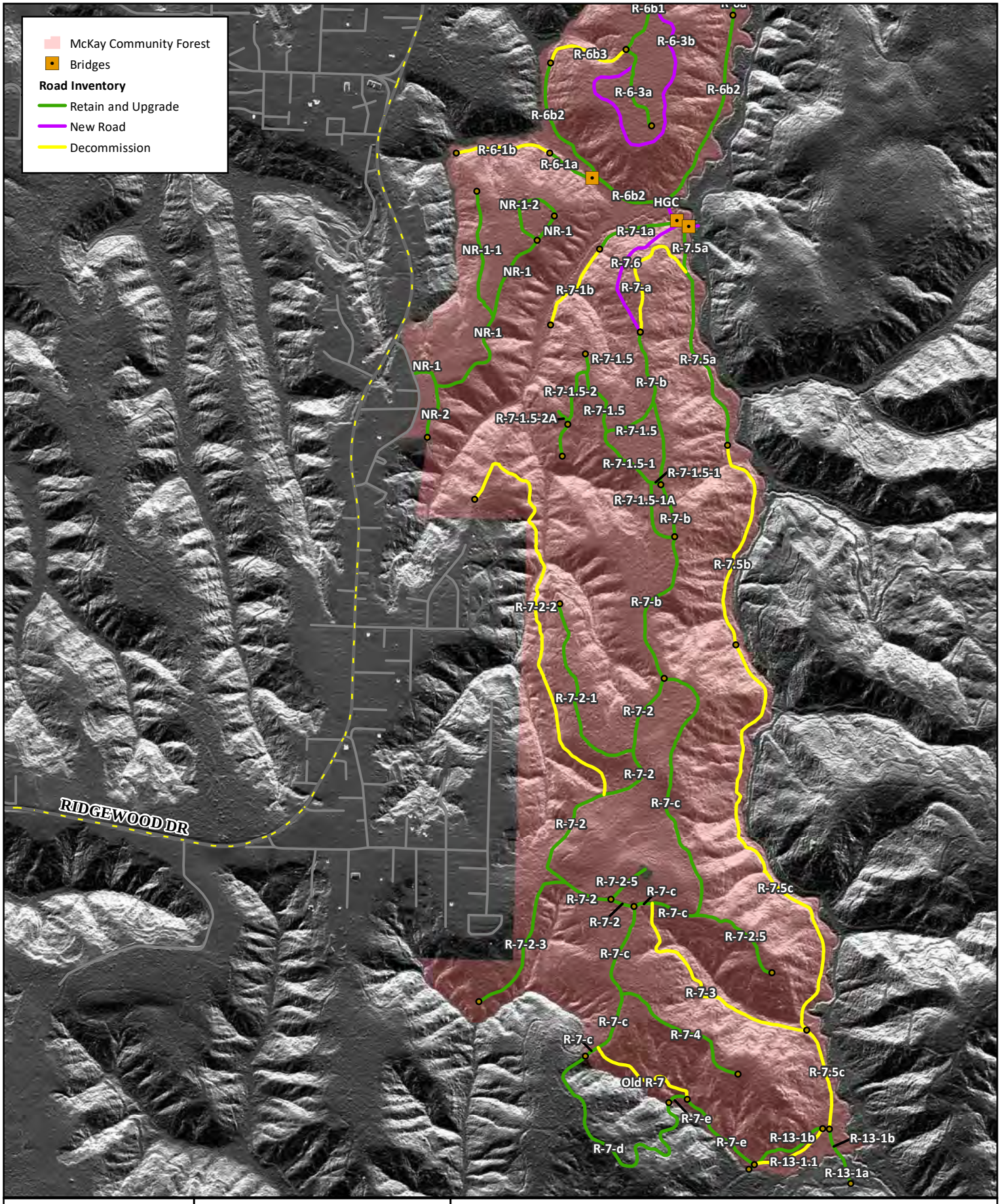

0 750 1,500 Feet

Imagery: Access Geographic 2019
Printed: June 24, 2021
Humboldt County Public Works

# McKay Community Forest

## Proposed Road System - South

**Map 1-13**
Aerial




0 750 1,500 Feet

Imagery: LiDAR Hillshade
Printed: June 24, 2021
Humboldt County Public Works

# McKay Community Forest

## Proposed Road System - South

**Map 1-13**
LiDAR

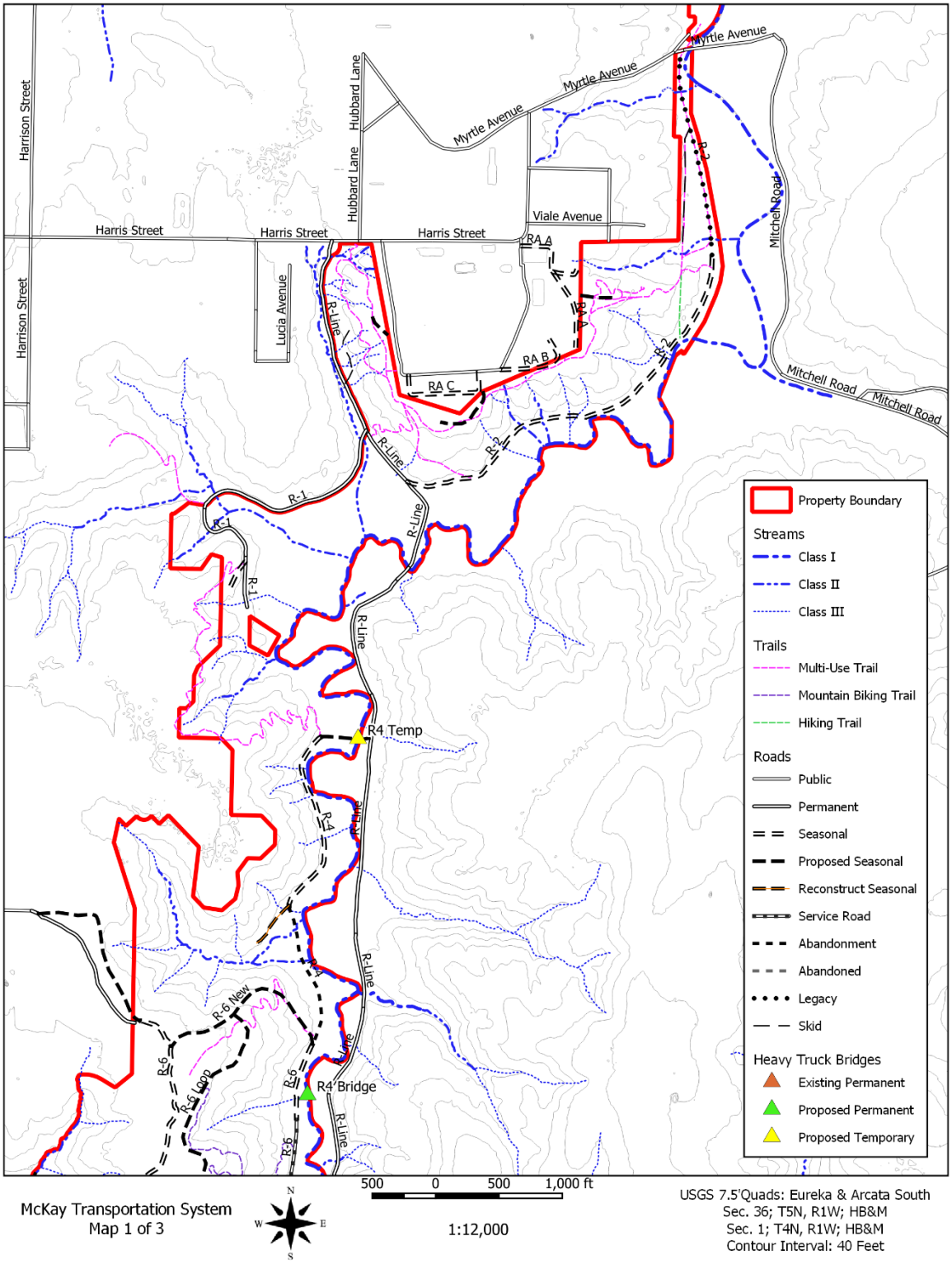



*Figure 21. Transportation System North*

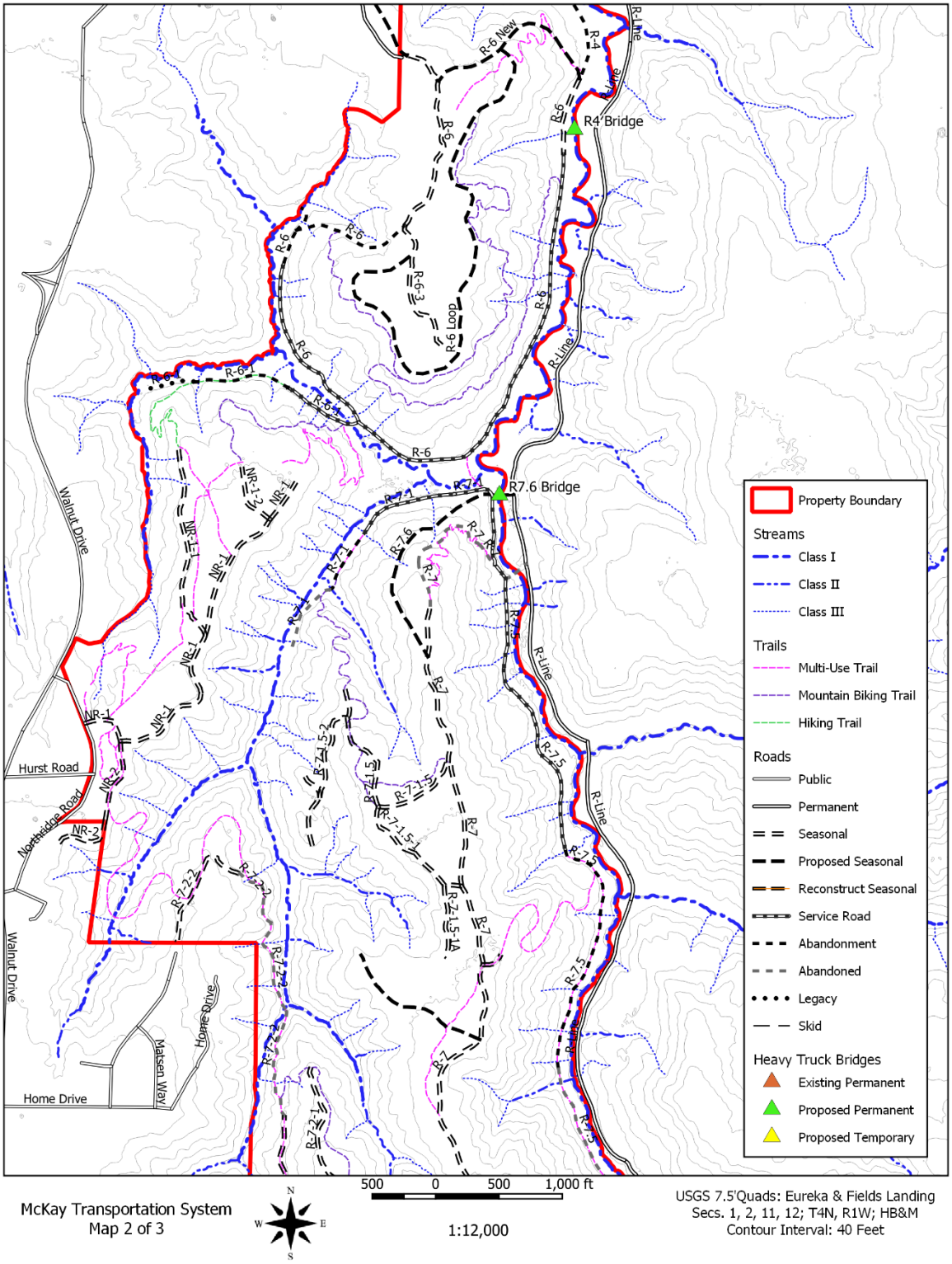



*Figure 22. Transportation System Middle*

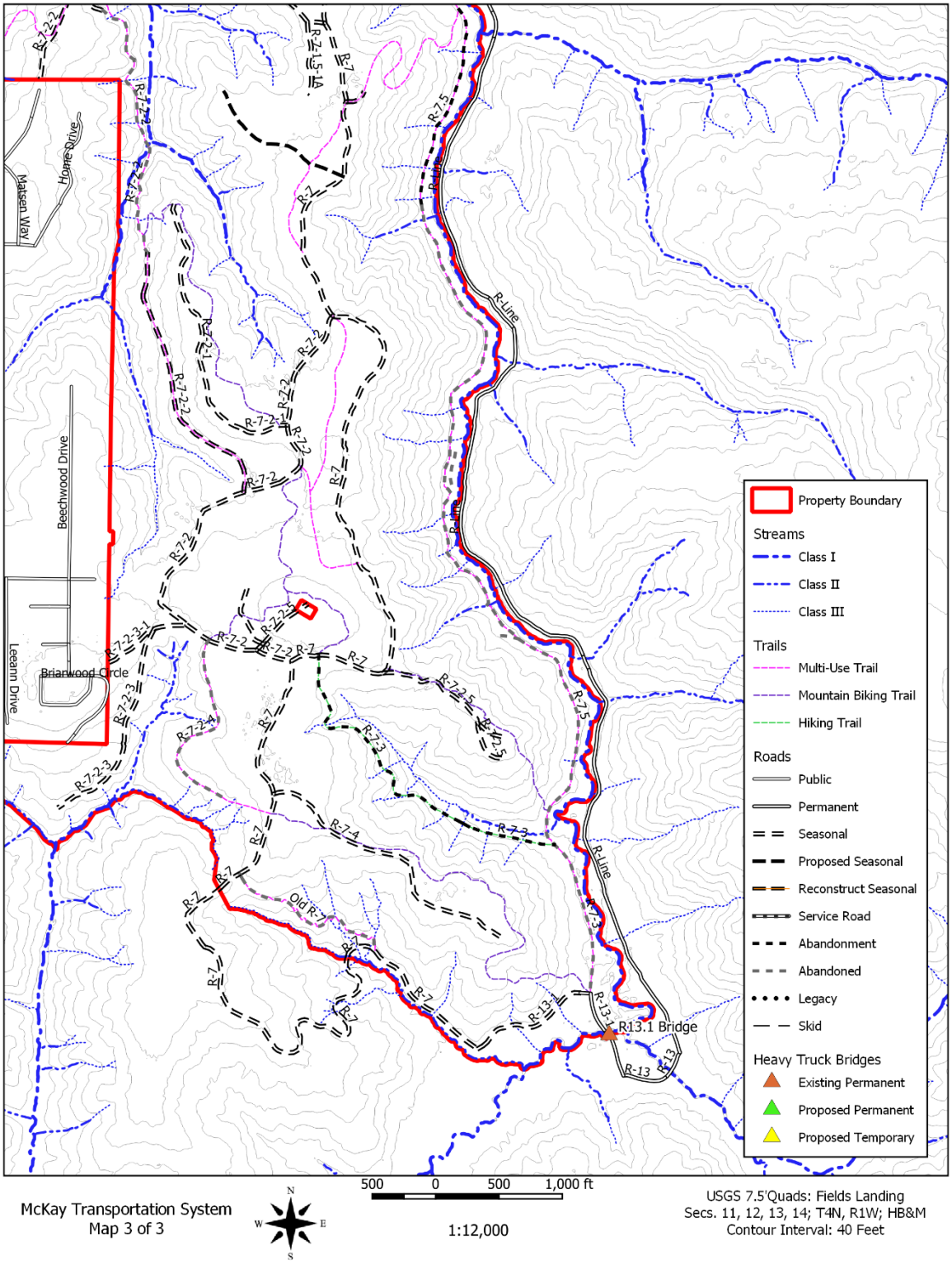



*Figure 23. Transportation System South*

# ATTACHMENT D

## Road and Trail Inventory

# McKay Community Forest Road and Trail Inventory

**Table 1: Logging Road Segments to be Retained and Upgraded for Permanent Road Network**

| Road Name | Geodatabase Components | Length (miles) | Trail Planning Unit | Road Type | | Description |
|---|---|---|---|---|---|---|
| | | | | Type 1 | Type 2 | |
| R-Line (MCF portion only) | R-b | 0.23 | Redwood Acres | X | | Segment R-b is situated between the second and third gate. This segment receives substantial seasonal flooding. Segment R-a (0.31 miles), situated between the first and second gate, is on Green Diamond property. |
| R-1 (MCF portion only) | R-1b | 0.21 | Redwood Acres | X | | Segment R-1a (0.32 miles) is on Green Diamond property. Road segments R-1a and R-1b provide access to the private inholding property. |
| R-2 | R-2a | 0.61 | Redwood Acres | X | | Southern portion of the R-2 road. Upgrades needed. |
| R-4 | R-4a, R-4c | 0.37 | North McKay | X | | Upgrades needed. The R-4b segment will be decommissioned. |
| R-4-1a | R-4-1a | 0.12 | North McKay | X | | Upgrades needed |
| R-4 Bridge | R-4 Bridge | 0.05 | Mid-McKay | X | | Need to restore bridge across Ryan Creek to connect R-4/R-6 and R-Line (likely a 30-foot railcar) |
| R-6 | R-6a | 0.07 | Mid-McKay | X | | |
| | R-6b1 (MM-4) | 0.25 | Mid-McKay | X | | Ridge-top road. |
| | R-6b2 (MM-1&MM-2) | 0.93 | Mid-McKay | | X | Situated along left banks of Bob Hill Gulch and Ryan Creek. |
| | R-6c | 0.07 | Mid-McKay | X | | Haul road leading to Winship School and Cypress Avenue, upgrades needed |
| R-6-1 | R-6-1a (NT-6b) | 0.12 | Northridge | | X | |
| R-6-3 | R-6-3a | 0.21 | Mid-McKay | X | | Spur road for timber harvest, upgrades needed |
| R-7 (MCF portion only) | R-7b, R-7c, R-7e | 2.28 | South McKay / Henderson Gulch | X | | Primarily ridge-top road, upgrades needed. Segment R-7d (0.64 miles) is on Green Diamond property. |
| R-7.5 (northern portion) | R-7.5a | 0.55 | South McKay | | X | Adequate setback from streamside area, upgrades needed. |
| R-7-1 | R-7-1a | 0.20 | South McKay | | X | |
| R-7-1.5 complex | R-7-1.5<br>R-7-1.5-1<br>R-7-1.5-1A<br>R-7-1.5-2<br>R-7-1.5-2A | 0.94 | South McKay | X | | Ridge-top and mid-slope roads, upgrades needed |
| R-7-2 | R-7-2 | 0.79 | Henderson Gulch | X | | Primarily ridge-top road, upgrades needed |
| R-7-2.5 | R-7-2.5 | 0.24 | Henderson Gulch | X | | Ridge-top road, upgrades needed |
| R-7-2-1 | R-7-2-1 | 0.45 | Henderson Gulch | X | | Spur road for timber harvesting operations, upgrades needed, dense brush |
| R-7-2-3 | R-7-2-3 | 0.38 | Henderson Gulch | X | | Spur road for timber harvesting operations, upgrades needed |

| Road Name | Geodatabase Components | Length (miles) | Trail Planning Unit | Road Type | | Description |
|---|---|---|---|---|---|---|
| | | | | Type 1 | Type 2 | |
| R-7-2-5 | R-7-2-5 | 0.10 | Henderson Gulch | X | | Primarily ridge top road in good condition. Leads to HCSD water tank. |
| R-7-4 | R-7-4 | 0.35 | South McKay | X | | Ridge-top road, upgrades needed |
| R-13-1 (MCF portion only) | R-13-1b | 0.29 | South McKay | X | | Upgrades needed. Segment R-13-1a (0.07 miles) is on Green Diamond property. In 2017, GDRC installed a temporary railcar bridge over the existing bridge on R-13-1a. |
| NR complex | NR-1, NR-2, NR-1-1, NR-1-2 | 1.22 | Northridge | X | | Upgrades needed |
| | Total: | 11.0 | | 9.2 | 1.8 | |

**Notes:**
Type 1 Roads ("Timber Operations Roads") – Roads will be used for timber harvest operations, forest management, operations, and maintenance. Roads are intended to accommodate periodic use by large trucks and heavy equipment. Roads will be managed in accordance with the Forest Practice Rules.

Type 2 Roads ("Service Roads") – Roads will be used for forest management, operations, and maintenance only (no timber harvest operations). Roads are intended to accommodate periodic use by pick-up trucks and other light vehicles.

**Table 2: New Road Segments for Permanent Road Network**

| Road Name | Geodatabase Components | Length (miles) | Trail Planning Unit | Road Type | | Description |
|---|---|---|---|---|---|---|
| | | | | Type 1 | Type 2 | |
| R-4-1b | R-4-1b | 0.12 | North McKay | X | | Extension of mid-slope road for timber harvest access |
| Winship Connector (on school property) | WC | 0.29 | Mid-McKay | X | | Flat terrain, access via easement deed. Needed for timber harvest and emergency response access. |
| R-6-3 | R-6-3b | 0.89 | Mid-McKay | X | | Ridge-top road near break in slope for timber harvest access |
| | R-6-3c | 0.29 | Mid-McKay | X | | Hillslope road connecting R-6-3 and R-4 |
| Henderson Gulch Connection | HGC | 0.06 | Mid-McKay / South McKay | X | | Construction of new bridge and approaches to connect Mid-McKay and South McKay trail units |
| R-7.6 | R-7.6 | 0.37 | South McKay | X | | Hillslope road connecting R-7 and R-7.5 |
| | Total: | 2.0 | | 2.0 | | |

**Table 3: Historic Road Segments to be Taken Out of Service and Converted to Trails**

| Road | Geodatabase Components | Length (miles) | Trail Planning Unit | Description |
|---|---|---|---|---|
| R-2 | R-2b (RA-19 and RA-20) | 0.33 | Redwood Acres | Northern portion of the R-2 road. Inadequate setback from streamside area of Ryan Slough, poor drainage. |
| R-4 | R-4b (NM-7) | 0.22 | North McKay | Crosses streamside area prone to flooding |
| R-6 | R-6b3 (MM-3) | 0.21 | Mid McKay | Deep through-cut damaged by motorbike use. |
| R-7-1 | R-7-1b1 | 0.21 | South McKay | Inadequate setback from streamside area of Henderson Gulch |
| R-7-2-2 | R-7-2-2 | 0.98 | Henderson Gulch | Mid-slope road in poor condition, logging access can be provided by R-7-2-1 |
| R-7 (northern portion) | R-7a | 0.32 | South McKay | Steep, unstable terrain (currently abandoned) |
| R-7.5 (middle portion) | R-7.5b | 0.50 | South McKay | Inadequate setback from streamside area of Ryan Creek |
| R-7.5 (southern portion) | R-7.5c | 1.27 | South McKay | Decommissioned in 2013 |
| R-7-3 | R-7-3 | 0.54 | South McKay | Streamside road, steep terrain |
| Old R-7 | Old R-7 | 0.27 | South McKay | Streamside road, steep terrain (currently abandoned) |
| R-13-1.1 | R-13-1.1 | 0.18 | South McKay | Unnecessary historic road |
| | Total: | 4.9 | | |

**Table 4: Historic Road Segments to be Fully Decommissioned**

| Road Name | Geodatabase Components | Length (miles) | Trail Planning Unit |
|---|---|---|---|
| R-6-1 | R-6-1b | 0.22 | Northridge |
| R-7-1 | R-7-1b2 | 0.10 | |
| | Total: | 0.3 | |

**Table 5: Redwood Acres Trail Planning Unit**

| No. | Trail Type | Length (miles) | Accessibility | Description |
|---|---|---|---|---|
| RA-1 | Multi-use Trail | 0.07 | Accessible parking at Harris Street is not practicable. | New trail providing the primary access to the Redwood Acres trail unit from Harris Street. Segment includes new bridge to cross ravine. Connects to RA-12. |
| RA-2 | Multi-use Trail | 0.19 | | New trail ending at power line corridor (junction with RA-3 and RA-10). |
| RA-3 | Multi-use Trail | 0.18 | | New trail construction starting at the power line corridor, crossing wet area, continuing through meadow section and ending on the east side of meadow. |
| RA-4 | Multi-use Trail | 0.31 | A portion (0.18 miles) can be fully accessible. Slope and width barriers begin 240 feet west of the Redwood Acres south gate. | New trail construction following power line corridor and Redwood Acres property line, ending where segment leaves power line corridor. RA-4 joins RA-5 at southeast corner of Redwood Acres. |
| RA-5 | Multi-use Trail | 0.07 | Fully Accessible Trail (main segment and west leg, not east leg) | New trail constructed through mature timber, ending at the pedestrian connector trail to Redwood Acres. Segment includes two legs (west and east) connecting to RA-13. |
| RA-6 | Multi-use Trail | 0.14 | Prohibitive natural barrier | New trail constructed from power line corridor downhill across the former railroad grade to bottom of hillside. Includes connector to RA-14. |
| RA-7 | Multi-use Road | 0.12 | | Trail coincides with former railroad grade and logging road (R-2) on dry ground and continues to the point where the “shunnel” primitive trail connects with main trail. |
| RA-8 | Multi-use Road | 0.18 | | Trail coincides with former railroad grade in wet conditions and continues to where the logging road (R-2) leaves the former railroad grade. A sinkhole associated with the PG&E natural gas distribution line is being addressed by PG&E. Safe conditions must be ensured before the trail is open to the public. |
| RA-9 | Multi-use Road | 0.22 | | Trail coincides with logging road (R-2), ending at start of relatively steep climb at old skid trail. |
| RA-10 | Multi-use Trail | 0.17 | | Trail coincides with skid trail climbing uphill, ends at connection to main trail |
| RA-11 | Multi-use Trail | 0.15 | | New trail constructed through mature timber stand, ending where steeper slope segment begins. |
| RA-12 | Multi-use Trail | 0.06 | Prohibitive natural barrier | New trail constructed through mature timber stand on steep slope, ending at the transition point to top of flat ridge. Connects RA-1 and RA-11. |
| RA-13 | Multi-use Trail | 0.08 | Fully Accessible Trail | New trail from Redwood Acres east gate to power line corridor, where RA-13 connects to RA-6. |

| | | | | |
|---|---|---|---|---|
| RA-14 | Hiking Trail | 0.09 | | New trail constructed through the “shunnel” grade, classified as primitive trail |
| RA-15 | Multi-use Road | 0.18 | | Trail on logging road (R-2 and R-Line), ending at second gate. |
| RA-16 | Multi-use Trail | 0.15 | | New trail linking North McKay to Redwood Acres, ending at second gate. |
| RA-17 | Multi-use Trail | 0.15 | Fully Accessible Trail | New trail loop connecting to RA-13 to provide an accessible trail through a mature second growth forest. Future viewing platform at overlook. |
| RA-18 | Multi-use Trail | 0.22 | | New trail from RA-6 to RA-19. Trail follows former railroad grade that was excavated into hillslope. Segment includes new bridge to cross a ravine. |
| RA-19 | Multi-use Trail | 0.22 | | New trail following former railroad grade on flat ground, some wet areas. Segment ends at the connection to loop and near the bridge crossing of gulley. |
| RA-20 | Multi-use Trail | 0.12 | | New trail following former railroad grade on flat ground, ending at south side of Ryan Slough bridge. |
| | Total: | 3.0 | | |

**Table 6: Park Street Trail Planning Unit**

| No. | Trail Type | Length (miles) | Description |
|---|---|---|---|
| PS-1 | Multi-use Trail | 0.05 | New trail constructed under Ryan Slough bridge, linking to access road near PG&E facility on north side. |
| PS-2 | Multi-use Road | 0.18 | Trail coincides with existing access road north of Ryan Slough bridge. |
| PS-3 | Multi-use Trail | 0.51 | On top of former railroad prism, from City of Eureka water facility to Park Street. Trail will be 8 to 10 feet wide for emergency vehicle access. |
| | Total: 0.7 | | |

**Table 7: North McKay Trail Planning Unit**

| No. | Trail Type | Length (miles) | Description |
|---|---|---|---|
| NM-1 | Multi-use Road | 0.32 | Trail coincides with existing logging/access road (R-1) and starts at connector trails to Redwood Acres Loop, ending at GDRC property boundary and start of uphill segment. |
| NM-2 | Multi-use Road | 0.13 | Trail coincides with existing logging/access road (R-1), ending where trail alignment leaves road |
| NM-3 | Multi-use Trail | 0.08 | New trail construction through relatively thick timber with some brush, ending at the McKay Ranch Subdivision property line. |
| NM-4 | Multi-use Trail | 0.41 | New trail construction through McKay Ranch Subdivision, ending at start of downhill segment. |
| NM-5 | Multi-use Trail | 0.32 | New trail construction using old skid trail alignment intermittently moving downhill, ending at the |

| | | | |
|---|---|---|---|
| | | | logging road (R-4) at bottom. |
| NM-6 | Multi-use Road | 0.29 | Trail on portion of logging road (R-4) to be retained, ending north of the power line easement. |
| NM-7 | Multi-use Trail | 0.21 | Trail on former logging road (R-4) segment, crosses unnamed creek, ends at Mid McKay Trail. |
| MC-01 | Multi-use Trail | 0.23 | Connector trail to Manzanita Avenue (outside the Community Forest). |

Total: 2.0

**Table 8: Mid-McKay Trail Planning Unit**

| No. | Trail Type | Length (miles) | Description |
|---|---|---|---|
| MM-1 | Multi-use Road | 0.79 | Trail associated with logging road (R-6 and R-4) on flat ground, ending at the connection and crossing to the Northridge trail unit. |
| MM-2 | Multi-use Road | 0.30 | Trail associated with logging road (R-6) on slightly sloped ground, ending at the start of steep uphill segment. |
| MM-3 | Multi-use Trail | 0.22 | Trail associated with logging road (R-6) in poor condition through steep segment, ending at top of slope on flat ground. |
| MM-4 | Multi-use Road | 0.21 | Trail associated with logging road (R-6) for the majority of the length, short section through timber. Segment ends at start of downhill off of flat ground. |
| MM-5 | Multi-use Trail | 0.11 | New trail construction through open small timber, segment ends at start of steeper sloped ground and the descent to bottom. |
| MM-6 | Multi-use Trail | 0.16 | New trail construction down steep sloped ground with open timber, includes switchbacks. Segment ends at the bottom of hill at the logging road (R-4). |
| MM-7 | Multi-use Road | 0.21 | Trail coincides with existing spur logging road (R-6-3a) in good condition through flat ground. |
| MM-8 | Multi-use Road | 0.89 | New trail associated with new logging road (R-6-3b) through flat ground, ending at MM-5. |
| MM-9 | Mountain Bike Trail | 1.04 | New trail construction through varying terrain and slope. Trail will follow topography to provide a mostly continuous downhill alignment for mountain bike use. |
| MM-10 | Mountain Bike Trail | 0.67 | New trail construction through varying terrain and slope. Trail will follow topography to provide a mostly continuous downhill alignment for mountain bike use. |
| MM-11 | Multi-use Road | 0.18 | New trail associated with new logging road R-6-3c. |

Total: 4.8

**Table 9: South McKay Trail Planning Unit**

| No. | Trail Type | Length (miles) | Description |
|---|---|---|---|
| SM-1 | Multi-use Road | 0.55 | Trail follows northern portion of R-7.5 road that will be retained. Flat ground, some wet areas, no crossings. Ends at the start of new trail section to top of ridge. |
| SM-2 | Multi-use Trail | 1.77 | Trail follows southern portion of R-7.5 which is decommissioned. Ends at junction with road R-13-1. |
| SM-3 | Multi-use Road | 0.20 | Trail following logging road (R-13-1.1) in good condition on flat ground. This segment ends where logging road changes from gentle to steeper slope. |
| SM-4 | Multi-use Road | 0.22 | Trail following logging road (R-7) in good condition, segment ends where trail leaves logging road. |
| SM-5 | Multi-use Trail | 0.31 | New trail following former logging road (Old R-7) l in poor condition with wet areas, several steep sections. Segment ends where trail joins with active logging road (R-7) on ridge line. |
| SM-6 | Multi-use Road | 0.36 | Trail aligned with logging road (R-7) with some steep sections. Segment ends at the junction with active logging/access road at top of ridge. |
| SM-7 | Multi-use Road | 0.73 | Trail aligned with active logging road (R-7) along ridge, one short steep section. |
| SM-8 | Multi-use Road | 0.79 | Trail aligned with active logging road (R-7) along ridge on flat ground, one section adjacent to older stand of timber. Segment ends at the start of steeper ground heading downhill. |
| SM-9 | Multi-use Road | 0.18 | Trail aligned with logging road (R-7) in poor condition on sloping ground, segment ends at start of abandoned section of road. |
| SM-10 | Multi-use Trail | 0.34 | New trail with some sections following abandoned section of logging road on steep ground, other sections through open timber. Segment ends at bottom of slope and connection to segment 1. |
| SM-11 | Multi-use Trail | 0.41 | New trail construction using some old skid trail establishing route to top of ridge from bottom road. Segment ends at SM-1/SM-2 junction. |
| SM-12 | Hiking Trail | 0.54 | New trail aligned with old logging road (R-7-3) in poor condition on sloped ground. Segment connects the Ryan Creek side and ridge top sections of the South McKay Ridge Trail. |
| SM-13 | Multi-use Trail | 0.26 | New trail constructed on relatively flat ground. Some areas aligned with old skid trails and logging roads. |
| SM-14 | Multi-use Road | 0.48 | Trail aligned with existing logging road (R-7-1.5) in good condition on flat ground. |
| SM-15a | Multi-use Road | 0.20 | Trail aligned with existing logging road in poor condition, stops at creek crossing. Connects with SM-1. |
| SM-15b | Multi-use Trail | 0.07 | Trail on former logging road beyond creek crossing. |
| SM-16 | Multi-use Road | 0.29 | Spur trail to vista point |
| SM-17 | Multi-use Road | 0.06 | New trail and road construction on flat ground includes bridge crossing of Henderson Gulch. |
| SM-18 | Mountain Bike | 0.68 | |

| | | | |
|---|---|---|---|
| | Trail | | |
| SM-19 | Mountain Bike Trail | 0.36 | |
| SM-20 | Mountain Bike Trail | 0.75 | |
| SM-21 | Multi-use Road | 0.37 | New trail associated with proposed new logging road (R-7.6). |

Total: 9.9

**Table 10: Northridge Trail Planning Unit**

| No. | Trail Type | Length (miles) | Accessibility | Description |
|---|---|---|---|---|
| NT-1 | Multi-use Road | 0.63 | Fully Accessible Trail | Trail on logging road (NR-1) starting at gate, continuing on flat ground, and ending at the start of steep downhill to Bob Hill Gulch. Meeting running slope standards will be challenging but should be feasible. |
| NT-2 | Multi-use Trail | 0.37 | Prohibitive natural barrier. Slope barriers begin 240 feet from NT-1 junction. | New trail construction in mostly steep terrain, some sections aligned with old skid trails. Segment ends at bottom of hill at the crossing to Mid-McKay. |
| NT-3 | Multi-use Road | 0.17 | Fully Accessible Trail | New trail construction with a portion utilizing a former logging road on flat ground. Segment ends at the junction with main trail. |
| NT-4 | Multi-use Trail | 0.27 | Improved Access Trail | New trail construction with a portion utilizing a former logging road on flat ground. Segment ends at the junction with main trail. |
| NT-5 | Multi-use Trail | 0.20 | Improved Access Trail | New trail construction with a portion utilizing a former skid trail on flat ground. Segment ends at the junction with main trail. |
| NT-6a | Hiking Trail | 0.40 | Prohibitive natural barrier. Slope barriers begin 115 feet from NT-11 junction. | Planned as hiking trail due to steep terrain and limited clearances. |
| NT-6b | Multi-use Road | 0.10 | Beyond prohibitive natural barrier. | Segment aligns with R-6-1, predominantly in good condition. Includes the 115-foot crossing to the Mid-McKay trail unit (also known as BG-01, the Bob Hill Gulch bridge crossing). |
| NT-7 | Multi-use Trail | 0.20 | Fully Accessible Trail | New trail on flat ground through large second growth stand of timber. |
| NT-8 | Multi-use Trail | 0.05 | Fully Accessible Trail | Segment connects parking area to main Northridge Trail system. New trail construction using some old logging and skid trails on flat ground. |

| | | | | |
|---|---|---|---|---|
| NT-9 | Multi-use Trail | 0.25 | Prohibitive natural barrier. Slope barriers begin 275 feet from trailhead. | From parking area to NT-1. New trail construction in sloped to some steep terrain, some sections aligned with old skid trails. Expect significant equestrian use. |
| NT-10 | Multi-use Trail | 0.20 | Intended to be lightly developed trail. Not planned for accessibility because alternative accessible trails are nearby | Connects NT-9 and NT-11. |
| NT-11 | Multi-use Road | 0.30 | Improved Access Trail | Connects NT-1 and NT-6. |
| NT-12 | Mountain Bike Trail | 0.33 | Single-use trail in steep terrain. | |
| | Total: | 3.46 | | |

**Table 11: Henderson Gulch Trail Planning Unit**

| No. | Trail Type | Length (miles) | Description |
|---|---|---|---|
| HG-1 | Multi-use Trail | 0.39 | New trail construction aligned for a large portion with former logging road (R-7-2-4) on relatively flat ground in heavy brush. |
| HG-2 | Multi-use Trail | 0.21 | New trail construction through open timber that crosses a low spot in the ridge between logging roads on different sides of ridge. |
| HG-3 | Multi-use Trail | 0.28 | New trail construction that follows ridgeline and connects to Segment 2 at low spot in ridge. |
| HG-4 | Multi-use Trail | 1.55 | New trail construction aligned for a large part with a former logging road (R-7-2-2). Includes crossing of Henderson Gulch at former crossing location, connects to the Northridge Trail system. |
| HG-5 | Multi-use Road | 0.69 | New trail construction following logging road (R-7-2) in good condition on flat ground. |
| HG-6 | Multi-use Road | 0.45 | New trail construction following logging road (R-7-2-1) in good condition on flat ground in heavy brush. Lower priority due to limited connectivity. Initially projected as out-and-back trail. |
| HG-7 | Mountain Bike Trail | 0.60 | |
| HG-8 | Mountain Bike Trail | 0.52 | |
| | Total: | 4.7 | |

**Table 12: New Bridges**

| No. | Name | Waterbody or Feature | Trail Planning Unit | Trail Segment | Notes |
|---|---|---|---|---|---|
| BR-1 | Harris Trail Bridge | Unnamed ephemeral stream | Redwood Acres | RA-1 | • 20 foot span<br>• Bike, pedestrian, light vehicle |
| BR-2 | Ryan Ravine Bridge | Unnamed ephemeral stream | Redwood Acres | RA-18 | • 25 foot span<br>• Bike/pedestrian/equestrian |
| BR-3 | R-4 Bridge | Ryan Creek | Mid-McKay | N/A | • 90 foot span<br>• Logging equipment, emergency vehicles (not for public use)<br>• Connects road R-4 to R-Line<br>• Historical crossing location (railcar bridge removed in 1999) |
| BR-4 | Mid-McKay MBT Bridge | Unnamed ephemeral stream | Mid-McKay | MM-9 | • 15 foot span<br>• Bike, pedestrian |
| BR-5 | Lower Henderson Gulch Bridge | Henderson Gulch (near confluence with Ryan Creek) | Connects Mid-McKay and South McKay | SM-17 | • 75-90 foot span<br>• Bike, pedestrian, equestrian, light vehicle<br>• Connects road R-6 & R-7-1 (trail segments SM-17 & MM-1) |
| BR-6 | Lower Bob Hill Gulch Bridge | Bob Hill Gulch (upstream of confluence with Henderson Gulch) | Connects Mid-McKay and Northridge | NT-2 | • 45 foot span<br>• Bike, pedestrian, equestrian, light vehicle<br>• Connects roads R-6 & R-6-1 (trail segments NT-2/NT-6 & MM-1/MM-2 |
| BR-7 | Upper Bob Hill Gulch Bridge | Bob Hill Gulch | Northridge | NT-9 | • 20 foot span<br>• Bike, pedestrian, equestrian |
| BR-8 | West Fork Henderson Gulch Bridge | West Fork of Henderson Gulch | Henderson Gulch | HG-4 | • 15 foot span<br>• Bike, pedestrian, equestrian |
| BR-9 | Upper Henderson Gulch Bridge | Henderson Gulch | Henderson Gulch | HG-4 | • 20 foot span<br>• Bike, pedestrian, equestrian |
| BR-10 | South McKay Creek Trail Bridge #2 | Unnamed ephemeral stream | South McKay | SM-2 | • 30-35 foot span<br>• Bike, pedestrian, equestrian<br>• 200 feet north of trail junction with SM-12 |
| BR-11 | South McKay Creek Trail Bridge #1 | Unnamed ephemeral stream | South McKay | SM-2 | • 25-30 foot span<br>• Bike, pedestrian, equestrian<br>• 500 feet north of junction with SM-3 |
| BR-12 | R-7.5 Bridge | Ryan Creek | South McKay | N/A | • 90 foot span<br>• Logging equipment, emergency vehicles (not for public use) |

# ATTACHMENT E

# Controllable Sediment Discharge Source Treatments for Logging Road Conversions

**TABLE 1**

**McKay Community Forest Logging Road Conversions: Summary**

**Service Roads on Former Logging Roads**

| Road Name | PWA Points [1] | CSDS [2] | # CSDS | Treatment Schedule | Comments |
|---|---|---|---|---|---|
| R-6 | 851-881 | 851, 852, 853, 859, 862-863, 865, 870-873, 876-880 | 16 | 2023-2025 | 881 is northern end of R-6 service road (882 is southern end of R-4 logging road) |
| R-6-1 | 567-572 | 568, 570, 571, 572 | 4 | 2023-2025 | 572 is site of BR-6 bridge |
| R-7.5 | 451-464 | 452-459, 462-463 | 10 | 2024-2026 | Requires R-7.5 bridge to be in place prior to treatment; service road ends near 451 |
| R-7-1 | 1094-1097 | 1095, 1095.1, 1096, 1097.1 | 4 | 2024-2026 | |
| | | Total: | 34 | | |

**Trails on Former Logging Roads**

| Road Name | PWA Points | CSDS | # CSDS | Treatment Schedule | Comments |
|---|---|---|---|---|---|
| R-2 | 548-557 | None | 0 | Completed (2021) | PG&E implemented erosion mitigation project |
| R-4 | 883-886 | 885 | 1 | 2024-2026: initial source treatment<br>2027: restoration plan<br>2030: implement restoration plan | Treatment of 885 needs to be incorporated into broader restoration plan for Class II stream and floodplain; R-4 logging road ends near 886 |
| R-6 | 843-850 | 843, 846-849 | 5 | 2023-2024 | |
| R-6-1 | 559, 561-566 | 559, 561, 563-566 | 6 | 2022-2024 | May be possible to treat with hand tools only |
| R-7-1 | 1090-1093 | 1090 | 1 | 2022-2023 | This source will be prioritized due to proximity to Class II stream; treat concurrently with 1087-1089 |
| R-7-2-2 | 1564-1581 | None | 0 | n/a | |
| R-7 | None | None | 0 | n/a | |
| R-7.5 | 439-450 | 439-440, 443, 447-450 | 7 | 2024-2026 | Coordinate treatment of 450 with service road treatments on R-7.5 |
| R-7-3 | 467-485 | 470-472, 474-475, 477, 479, 479.1, 480, 482, 484-485 | 12 | 2025-2027 | 468 and 469 are already treated |
| Old R-7 | 1293-1298, 1125 | 1293-1298 | 6 | 2027-2030 | hiking trail |
| R-13-1.1 | 605-607 | None | 0 | n/a | |
| | | Total: | 38 | | |

**Points to be Fully Decommissioned**

| Road Name | PWA Points | CSDS | # CSDS | Treatment Schedule | Comments |
|---|---|---|---|---|---|
| R-6 | 844-845 | 844-845 | 2 | 2023-2024 | Located on access road to powerline |
| R-6-1 | 558 | 558 | 1 | 2023: treatment plan<br>2025-2027: implement treatment | Need more information on source conditions, urgency, treatment options; also more information on ownership (located on property boundary) |
| R-6-1 | 559.9, 560 | 559.9, 560 | 2 | 2022-2024 | |
| R-7-1 | 1087-1089 | 1087-1089 | 3 | 2022-2023 | Treat concurrently with 1090 |
| R-7-3 | 465-466 | None | 0 | Completed (2013) | 465 and 466 are located on R-7-3 spur, were treated by PCFWWRA |
| | | Total: | 8 | | |

**Date updated: May 23, 2022**

**Notes:**

(1) This column shows the range of survey points identified in PWA's road assessment report (2014) along with unpublished supplemental data.

(2) This column shows the survey points that were identified as Controllable Sediment Discharge Sources (CSDS) by BBW and Humboldt County in 2021. Sites that have already been treated are not listed.

**TABLE 2**

**McKay Community Forest Logging Road Conversions: Sediment Site Treatments**

**Service Roads on Former Logging Roads**

| Road Name | PWA Points | CSDS | Type | Description | Treatment |
|---|---|---|---|---|---|
| R-6 | 851-881 | 851 | Potential Class III crossing (no defined channel) | Inboard road sloping creates localized drainage accumulation. No active erosion. | Improve drainage by installing water bars and outsloping trail throughout section. Shift trail to higher portion of road prism where feasible. |
| | | 852 | **Class III crossing (defined channel)** | A class 3 stream crossing with fill. Swale skidded above top and skid drags stream over to the right. Sediment fans out and stream diverts down road to left. 24" dbh spruce growing on berm just right of CLP. Diverts down very low gradient road and exits with slow erosion of shallow, low gradient OBF. Stream side road. | Develop drainage swale, or rock ford if necessary for water crossing location, remove 1-2 yds., improve drainage as necessary, install water bars/water knock-outs where appropriate, use trail construction BMP's. |
| | | 853 | Potential Class III crossing (no defined channel) | A crossing with fill. Spring flow runs down onto road and diverts to the left. Also spring 60' to right runs down road also. | Develop drainage swale, or rock ford if necessary for water crossing location, remove 1-2 yds., improve drainage as necessary, install water bars/water knock-outs where appropriate, use trail construction BMP's. |
| | | 859 | Potential Class III crossing (no defined channel) | Inboard road sloping creates localized drainage accumulation. No active erosion. | Improve drainage by installing water bars and outsloping trail throughout section. |
| | | 862 | Potential Class III crossing (no defined channel) | Upstream from Lower Bob Hill Gulch bridge site. Inboard road sloping creates localized drainage accumulation. No active erosion. | Outslope road throughout section. Install water bars, may need to import soil to fill rutting. |
| | | 863 | Potential Class III crossing (no defined channel) | At Bob Hill Gulch bridge site, road insloped, poor drainage against bank. No active erosion. | Improve road drainage, outslope and place water bars, re-establish old water bars, may need to import soil to fill rutting. |
| | | 865 | Potential Class III crossing | A crossing with fill, stream is crossed by skid that runs up steep slope to left, just above this road. Motorcycle traffic has broken down waterbars on skid. Stream diverts to left and right on this road, crossing is at high spot in road. Flow drains down road in both direction and puddles up on road and exits over low gradient shallow OBF with minor erosion. Road surface down left road is being slowly gullied. | Improve drainage by installing water bars and outsloping trail throughout section. |
| | | 870 | Potential Class III crossing (no defined channel) | Drainage could be improved with basic BMPs. No active erosion. | Improve drainage with outsloping and placement of water bars where appropriate, remove outboard road berm, re-establish old water bars, shift trail to higher portion of road prism where feasible. |
| | | 871 | Potential Class III crossing (no defined channel) | Drainage could be improved with basic BMPs. No active erosion. | Improve drainage with outsloping and placement of water bars where appropriate, remove outboard road berm, re-establish old water bars, shift trail to higher portion of road prism where feasible. |
| | | 872 | Potential Class III crossing (no defined channel) | Drainage could be improved with basic BMPs. No active erosion. | Improve drainage with outsloping and placement of water bars where appropriate, remove outboard road berm, re-establish old water bars, shift trail to higher portion of road prism where feasible. |
| | | 873 | Potential Class III crossing (no defined channel) | Drainage could be improved with basic BMPs. No active erosion. | Improve drainage with outsloping and placement of water bars where appropriate, remove outboard road berm, re-establish old water bars, shift trail to higher portion of road prism where feasible. |
| | | 876 | Potential Class III crossing (no defined channel) | Drainage could be improved with basic BMPs. No active erosion. | Bypass wet area by creating new trail alignment on higher ground within spruce stand. |
| | | 877 | Potential Class III crossing (no defined channel) | Drainage could be improved with basic BMPs. No active erosion. | Bypass wet area by creating new trail alignment on higher ground within spruce stand. |
| | | 878 | Potential Class III crossing (no defined channel) | Drainage could be improved with basic BMPs. No active erosion. | Improve drainage with outsloping and placement of water bars where appropriate, remove outboard road berm, re-establish old water bars, shift trail to higher portion of road prism where feasible. |
| | | 879 | Potential Class III crossing (no defined channel) | Drainage could be improved with basic BMPs. No active erosion. | Improve drainage with outsloping and placement of water bars where appropriate, remove outboard road berm, re-establish old water bars, shift trail to higher portion of road prism where feasible. |
| | | 880 | Potential Class III crossing (no defined channel) | Drainage could be improved with basic BMPs. No active erosion. | Improve drainage with outsloping and placement of water bars where appropriate, remove outboard road berm, re-establish old water bars, shift trail to higher portion of road prism where feasible. |

**TABLE 2**

**McKay Community Forest Logging Road Conversions: Sediment Site Treatments**

| | | | | | |
|---|---|---|---|---|---|
| R-6-1 | 567-572 | 568 | Potential Class III crossing | A small ephemeral stream with a big pile of dirt between top and IBR. A dip and gully on left hinge drains any overland flow, low erosion. Has created gully and OBF slumps in past. Could cause additional OBF failures over time and could divert down left road with minimal filling/blocking of super shallow dip. Erosion rate at present appears very low. | Develop drainage swale, or rock ford if necessary for water crossing location, remove 1-2 yds., improve drainage as necessary, install water bars/water knock-outs where appropriate, use trail construction BMP's. |
| | | 570 | Potential Class III crossing (no defined channel) | Drainage could be improved with basic BMPs. No active erosion. | Improve drainage by installing water bars and outsloping trail throughout section. |
| | | 571 | Potential Class III crossing | A near origin class 3 stream with fill clogging swale above top. Stream diverts down road to right at this fill crossing. Big berm on OBF, crossing is intact. Flow diverts right to log stringer bridge site 572 causing gully down OBF and collapse feature. Erosion ongoing at low rate. | Develop drainage swale, or rock ford if necessary for water crossing location, remove 1-2 yds., improve drainage as necessary, install water bars/water knock-outs where appropriate, use trail construction BMP's. |
| | | 572 | **Class I stream** | Remnant log stringers and perched sediment from historical crossing. | Remove remnant log stringers and perched sediment. Install 45-foot bridge (BR-6) to span channel. |
| R-7.5 | 451-464 | 452 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. | Improve drainage throughout section, install water bars/water knock-outs where appropriate. |
| | | 453 | Potential Class III crossing (no defined channel) | Alluvial fan located inboard edge of road. | Improve drainage at both ends of fan (north and south) to cross trail at water bars to be developed, rock fords are not anticipated based on flow potential, if necessary will be installed at later time. |
| | | 454 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. | Improve drainage throughout section, install water bars/water knock-outs where appropriate. |
| | | 455 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. | Improve drainage throughout section, install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 456 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's as designed. |
| | | 457 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. | Improve drainage throughout section, especially at the skunk cabbage patch. Shift trail to higher portion of road prism as appropriate adjacent to spruce trees. |
| | | 458 | **Class III crossing (defined channel)** | An active channel exists adjacent to trail alignment on the upslope side of trail, water crosses the trail at water bar location. | Install rock ford at crossing, strengthen and improve drainage upslope and downslope of rock ford. Improve road drainage on either side of crossing by installing water bars/water knock-outs where appropriate. |
| | | 459 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. | Install water bars at a minimum of 2 locations, one aligned with large 20-24" alder, the other water bar downstream approx. 40', place rock ford at location near water bar at large alder. |
| | | 462 | Potential Class III crossing (no defined channel) | No evidence of Class 3 stream crossing, improve drainage as necessary, install water bars/water knock-outs where appropriate | Improve drainage throughout section, install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 463 | Potential Class III crossing (no defined channel) | No evidence of Class 3 stream crossing, improve drainage as necessary, install water bars/water knock-outs where appropriate | Improve drainage throughout section, install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| R-7-1 | 1094-1097 | 1095 | Potential sediment source | Historic landslide has completely healed, heavily vegetated, no active erosion. Drainage could be improved with basic BMP's. | Improve drainage throughout section, install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 1095.1 | Potential sediment source | Historic landslide has completely healed, heavily vegetated no active erosion. Drainage could be improved with basic BMP's. | Improve drainage throughout section, install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 1096 | Potential sediment source | Historic landslide is heavily vegetated, no active erosion. Drainage could be improved with basic BMP's. | Use mini-excavator to improve drainage and install trail (service road) across lanslide. Remove two leaning redwood trees. Grade soil from landslide and use material to decrease slope of trail (service road) through slide area. Outslope trail and install water bars, water knock-outs as appropriate with mini-ex, apply trail construction BMP's. |

**TABLE 2**

**McKay Community Forest Logging Road Conversions: Sediment Site Treatments**

| | | | | | |
|---|---|---|---|---|---|
| | | 1097.1 | Potential sediment source | Appears to be the same as site #1096 | Use mini-excavator to improve drainage and install trail (service road) across lanslide. Remove two leaning redwood trees. Grade soil from landslide and use material to decrease slope of trail (service road) through slide area. Outslope trail and install water bars, water knock-outs as appropriate with mini-ex, apply trail construction BMP's. |

**Trails on Former Logging Roads**

| Road Name | PWA Points | CSDS | Type | Description | Treatment |
|---|---|---|---|---|---|
| R-2 | 548-557 | 550 | **Class II crossing** | PG&E gas line project | PG&E installed concrete box culvert in 2021 |
| R-4 | 883-886 | 885 | **Class II crossing** | Existing 18-inch diameter culvert (corrugated metal pipe) passes water but deteriorated culvert condition and size/quality of stream warrant an upgrade. Site is situated within a low, flat, marshy valley that has likely been impacted by excess sediment. Upstream restoration would be needed in addition to culvert replacement in order to ensure habitat connectivity. | In the short-term, improve road drainage during trail construction and monitor for signs of failure. Seek grant funding to replace crossing and perform stream restoration to connect Ryan Creek with upstream tributary habitat. |
| R-6 | 843-850 | 843 | **Class III crossing (defined channel)** | Evidence of active erosion, road has deep rutting caused by concentrated water flow from poor drainage. Drainage could be improved with basic BMP's. Appears to be primarily spring fed. | Install rock ford at crossing. Use mini-excavator at time of timber harvest of Winship flat to decommission road and convert to trail. Fill deep rut, install swithchback, and shift trail to higher portion of road prism as appropriate. |
| | | 846 | Potential Class III crossing (no defined channel) | Evidence of active erosion, road has some rutting caused by concentrated water flow from poor drainage. Drainage could be improved with basic BMP's. | Re-establish large water bar at top of grade, place two additional water bars before site 847. Use large equipment at time of NTO at Winship flat to decommission this section of road to trail. Improve drainage throughout, outslope trail, use locations of old water bars and establish new water bars as appropriate, use trail construction BMP's. |
| | | 847 | Potential sediment source | Evidence of active erosion, road has some rutting caused by concentrated water flow from poor drainage. Drainage could be improved with basic BMP's. | Use heavy equipment at time of timber harvest at Winship flat to decommission this section of road to trail. Improve drainage throughout, outslope trail, use locations of old water bars and establish new water bars as appropriate, use trail construction BMP's. |
| | | 848 | Potential Class III crossing (no defined channel) | Evidence of active erosion, road has some rutting caused by concentrated water flow from poor drainage. Drainage could be improved with basic BMP's. | Use heavy equipment at time of timber harvest at Winship flat to decommission this section of road to trail. Improve drainage throughout, outslope trail, use locations of old water bars and establish new water bars as appropriate, use trail construction BMP's. |
| | | 849 | Potential Class III crossing (no defined channel) | An approximately 300 foot section from upslope of this location to near site # 851 has some active erosion noted, no evidence of recent flow from gulch. Drainage could be improved with basic BMP's. | Use min-excavator at time of timber harvest of Winship flat to decommission road and put to trail. Improve drainage throughout, outslope trail, re-establish old failed water bars, install new water bars along this 300' section, shift trail to higher portion of road prism where feasible. |
| R-6-1 | 559, 561-566 | 559 | Potential sediment source | Historic landslide has completely healed, heavily vegetated, no active erosion. Drainage could be improved with basic BMP's. | Improve drainage throughout section, install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 561 | **Class III crossing (defined channel)** | Evidence of past flow across trail. Drainage could be improved with basic BMP's. | Improve drainage at crossing location, install rock ford or 18" culvert (based on further evaluation of design flows). Elevate trail both sides of crossing, remove 2-3 yds of material use for fill on elevated section, outslope trail, use trail construction BMP's. |
| | | 563 | Potential Class III crossing (no defined channel) | Drainage could be improved with basic BMPs. No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 564 | Potential sediment source | Historic landslide is heavily vegetated no active erosion. Drainage could be improved with basic BMP's. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 565 | Potential Class III crossing (no defined channel) | Evidence of past flow across trail. Drainage could be improved with basic BMP's. | Develop drainage swale, or rock ford if necessary for water crossing location, remove 1-2 yds., improve drainage as necessary, install water bars/water knock-outs where appropriate, use trail construction BMP's. |

**TABLE 2**

**McKay Community Forest Logging Road Conversions: Sediment Site Treatments**

| | | | | | |
|---|---|---|---|---|---|
| | | 566 | **Class III crossing (defined channel)** | Small Class III stream with defined channel observed upstream. Crossing filled with sediment, flow is sub-surface. Site is largely naturalized with vegetation including large trees and no active erosion. Access for heavy equipment would require improving road access. Low urgency for treatment. | In the short-term, remove 1-3 cubic yards with hand tools at low spot in trail and crossing area, install rock ford, improve road drainage as necessary. Install water bars/water knock-outs where appropriate, Use trail construction BMP's. For the permanent treatment, plan to use a mini-excavator at the time of installation of the bridge across Bob Hill Gulch (BR-6) to fully excavate the channel and restore a natural flow-line. Spoils could likely be spread across road prism. |
| R-7-1 | 1090-1093 | 1090 | **Class II crossing** | Shallow crossing filled with excess sediment. | Install rock ford at crossing. Relocate 1-3 yds of material and use on trail for improved drainage. |
| R-7-2-2 | 1564-1581 | None | | | |
| R-7 | None | None | | | |
| R-7.5 | 439-448 | 439 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with basic BMP's. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 440 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with basic BMP's. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 443 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with basic BMP's. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 447 | Potential sediment source | Historic landslide is heavily vegetated no active erosion. Drainage could be improved with basic BMP's. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 448 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with basic BMP's. | Improve existing drainage swale across trail, remove 1-2 yds, install rock ford, improve drainage as necessary throughout section. Install water bars/water knock-outs, outslope trail where appropriate, use trail construction BMP's. |
| | | 449 | Potential sediment source | No active erosion noted. | Improve drainage along trail alignment to avoid fill slope on outboard edge. Install water bars and outslope trail where appropriate, use trail construction BMP's. |
| | | 450 | **Class II stream** | Channel located on north side of alluvial fan where hillsope transitions to flat road grade. Site is heavily naturalized with vegetation including large trees. No active erosion. Removing all excess sediment would create major disturbance. Road access for equipment and dump trucks would need to be developed. | Install rock ford at crossing. Improve road drainage on either side of crossing by installing water bars/water knock-outs where appropriate, use trail construction BMP's. |
| R-7-3 | 467-485 | 468 | Potential Class III crossing (no defined channel) | This site, as well as 467 and 469 were included with road decom work associated with the R-7.5. Thick vegetation and trees are well established. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 469 | Potential sediment source | This site, as well as 467 and 468 were included with road decom work associated with the R-7.5. Thick vegetation and trees are well established. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 470 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with simple BMP's. | Two large water bars in this section need to be improve, install additional water bars/water knock-outs where appropriate, use trail construction BMP's. |
| | | 471 | Potential sediment source | Historic landslide is heavily vegetated no active erosion. Drainage could be improved with simple BMP's. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 472 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with simple BMP's. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 474 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with simple BMP's. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 475 | Potential sediment source | Failed cutbank contributing to poor drainage, no active erosion. Drainage could be improved with simple BMP's. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |

**TABLE 2**

**McKay Community Forest Logging Road Conversions: Sediment Site Treatments**

| | | | | | |
|---|---|---|---|---|---|
| | | 477 | **Class III crossing (defined channel)** | Evidence of past flow across trail. Drainage could be improved with simple BMP's. | Existing drainage swale across trail needs improvement, remove 2-3 yds at crossing, install rock ford. Move crossing location slightly upslope (3-5 feet) from currrent crossing location,improve drainage as necessary. Install water bars/water knock-outs where appropriate, use trail construction BMP's. |
| | | 479 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with simple BMP's. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 479.1 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with simple BMP's. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 480 | **Class III crossing (defined channel)** | Water from spring/water hole approximately 50 feet up road on inboard edge diverts across trail at existing water bar. Drainage could be improved with simple BMP's. | Establish a rock ford at the existing water bar location, re-establish other existing water bars in section, install water bars/water knock-outs and improve drainage as necessary. Outslope trail where appropriate, use trail construction BMP's. |
| | | 482 | **Class III crossing (defined channel)** | Channel located on east side of alluvial fan where hillsope transitions to flat road grade. Site is heavily naturalized with vegetation including large trees. Water crosses trail approximately 50 feet from alluvial fan at existing water bar, flowing on the inboard edge of road and 1-3 feet off of trail alignment. | Move trail away from "social trail" alignment to higher ground on outboard edge of road, improve drainage throughout section, outslope trail where appropriate. Improve drainage from alluvial fan, install rock ford at existing water bar approximately 50' downslope from alluvial fan. Use trail construction BMP's. |
| | | 484 | Potential Class III crossing (no defined channel) | Large sink hole located on the outboard edge of road, no active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with simple BMP's. | Repair two sink holes associated with 484 and 485 with mini-ex at time of R-7 road work or at time of NTO in this section of MCF. The R-7 is approximately 200 ' from these sites, improve drainage, outslope trail, install water bars as necessary. Use trail construction BMP's. |
| | | 485 | Potential Class III crossing (no defined channel) | Small sink hole located on the outboard edge of road, no active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with simple BMP's. | Repair two sink holes associated with 484 and 485 with mini-ex at time of R-7 road work or at time of NTO in this section of MCF, R-7 is approximately 200 ' from sites, improve drainage, outslope trail, install water bars as necessary. Use trail construction BMP's. |
| Old R-7 | 1293-1298, 1125 | 1293 | Potential spring location (no water located) | Small sink hole on inboard edge of road, no active erosion noted at location. Thick vegetative cover throughout with well established trees, with heavy forest floor leaf litter/duff noted throughout section. | Repair sink hole when constructing trail. Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 1294 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with simple BMP's. Thick vegetative cover throughout with well established trees, with heavy forest floor leaf litter/duff noted throughout section. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 1295 | Potential sediment source | Historic landslide is heavily vegetated with no active erosion noted. Drainage could be improved with basic BMP's. Thick vegetative cover throughout with well established trees, with heavy forest floor leaf litter throughout. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 1296 | Potential Class III crossing (no defined channel) | No active erosion, no evidence of recent flow from gulch, marginal Class 3 small gulch. Drainage could be improved with simple BMP's. Thick vegetative cover throughout with well established trees, with heavy forest floor leaf litter/duff noted throughout section. | Improve drainage throughout section install water bars/water knock-outs and outslope trail where appropriate, use trail construction BMP's. |
| | | 1297 | Potential Class III crossing (no defined channel) | Evidence of past flow across trail, from the potential Class III or spring located adjacent to inboard edge of road. Drainage could be improved with basic BMP's. | Re-establish existing water bars and install new water bars/water knock-outs as appropriate in trail construction. If necessary, construct rock ford at water crossing, improve drainage throughout. Trail to be realigned in this section to Redwood stump clump on outboard edge of road, establish water bar above and below stump clump. Use trail construction BMP's. |

**TABLE 2**

**McKay Community Forest Logging Road Conversions: Sediment Site Treatments**

| | | | | | |
|---|---|---|---|---|---|
| | | 1298 | **Class III crossing (defined channel)** | No active erosion. Flow appears to go sub-surface under historic road crossing. Road drainage could be improved with basic BMP's. | In the short-term, remove 1-3 cubic yards with hand tools at low spot in trail and crossing area, install rock ford, improve road drainage as necessary. Install water bars/water knock-outs where appropriate, use trail construction BMP's. For the permanent treatment, plan to use a mini-excavator at the time of road improvements on the R-7 road to fully excavate the channel and restore a natural flow-line. Spoils could be spread locally. |
| R-13-1.1 | 605-607 | None | | | |

**Notes:**
BMP = Best Management Practices
CSDS = Controllable Sediment Discharge Site
PWA = Road assessment completed by Pacific Watershed Associates (2014) along with unpublished supplemental data

# ATTACHMENT F

## Comments from December 2020-February 2021

Humboldt Trails Council January 18, 2021
Post Office Box 7164
Eureka, CA 95502

Hank Seemann, Deputy Director
Humboldt County Public Works
1106 2nd Street
Eureka, CA 95501

**RE: Comments on the final McKay Community Forest Trail Plan**

The Humboldt Trails Council has reviewed the final McKay Community Forest Draft Trail Plan, and we want to applaud you on the thoroughness of the plan and associated designs. The purpose of this letter is to reaffirm our organization's commitment to working with you on trail maintenance.

We like that the plan will:

- provide a blueprint for the development of sustainable trails, access points, and amenities to support recreational and educational activities. This will occur incrementally over the course of years, and we are in strong support of volunteer trail construction.
- give consideration to a diversity of trail users with emphasis on accommodating users with accessibility needs.
- be used to support analysis of environmental impacts under the California Environmental Quality Act and application for permits and approvals.
- have this trail system connecting to our developing regional trail system.

Three other comments for future consideration.

- Signage (pg. 37) - that consideration be given to having bi-lingual signs. California's population is 39% Hispanic. This encourages and recognizes an underserved population in our county and will be an enhancement for tourism.
- Access point for Harris Street (pg. 43, Figure 3.1). HTC encourages the County to prioritize implementation of crosswalk enhancements such as traffic signs, high visibility crosswalk markings, bulb-outs, and/or new street lights at this location. Harris is a busy street with high speeds and multiple turns from Hubbard Lane. It is also a major east-west arterial in Eureka with a Class II bike lane. A transit stop is located on the north side of Harris. To meet the plan's goal for providing non-motorized alternative transportation access to the trails, a safe bike and pedestrian crossing is essential.
- Action Items on pg. 59, Item 11, evaluates appropriateness of e-bikes. There are many classes of e-bikes and we would like give input to that action item.

We look forward to following through with these commitments and the development of the McKay Community Forest as a vital community resource. Thank you for all you do for the trail community in Humboldt County.

Karen Underwood

Karen Underwood and the board of the Humboldt Trails Council

## Seemann, Hank

**From:** Eli Begley [redacted]
**Sent:** Monday, December 21, 2020 8:36 AM
**To:** Seemann, Hank
**Subject:** McKay forest trail

Hello, my name is Eli Begley, I'm a resident of Eureka, and I have some concerns about the trail's effect on wildlife. Can we have less of them? The area is currently pristine, and trails, human activity, and dogs (whether responsibly or irresponsibly handled) have a deleterious effect on the local wildlife and ground cover. I would rather have a trail than building development, but there's a lot of native wild ginger there that would be destroyed.
Banning dogs and having staff on hand could go a long way in keeping that forest healthy. That would benefit us as well: https://www.theguardian.com/environment/2020/mar/18/tip-of-the-iceberg-is-our-destruction-of-nature-responsible-for-covid-19-aoe?CMP=Share_iOSApp_Other
Thank you for your time, and I look forward to seeing how this project turns out.

February 9, 2021

Hank Seeman
hseemann@co.humboldt.ca.us
Humboldt County Department of Public Works
1106 Second Street, Eureka, CA, 95501

This comment may appear long, but it is in very large type to permit readability on various devices. Where information is needed but not crucial - type size may be smaller.

**PROJECT NAME: McKay Community Forest** https://humboldtgov.org/mckayforest

**Two documents appear to be part of this CEQA.**

First Document: https://humboldtgov.org/DocumentCenter/View/91420/McKay-Trail-Plan-CEQA-initial-study-12-16-2020 (referred to as "CEQA Document")

Second Document: dated 20 December 2020 https://humboldtgov.org/DocumentCenter/View/91417/McKay-Trail-Plan-text-only). The maps are separate at https://humboldtgov.org/DocumentCenter/View/91419/McKay-Trail-Plan-Maps (referred to as "Dec 2020")

Both documents start at page one and number upwards, so each one has a page 2, a page 14 and so on. They are herein referenced either "Dec 2020" or "CEQA Document" followed by page number, table numbers, etc. It would be helpful for future documents to have a Leading Indicator of which document one is reading, particularly in a pair which borrow some - but not all text and meaning from each other.

**These documents do not agree entirely with each other.**

CEQA requires that any reasonable individual be able to understand the project from the CEQA document. However, in this project, not all the information is in the CEQA document, details are in the cited Trail Plan (Dec 2020).

Besides this confusion between the two documents describing the same project, some information is contradictory between the two packages; some is contradictory within the same document. It is not possible that a reasonable individual should be expected to understand a project that even its own planners do not describe consistently.

***Contradiction Number One - Roads are retained by Green Diamond***

Dec 2020 Page 13 reads "Roads provide the backbone and starting point for planning the Community Forest trail system. In addition to timber harvest operations, roads are necessary for maintenance vehicles, construction equipment, patrols, fire-fighting, and emergency response. The proposed road network includes 11.5 miles of road segments to be retained and upgraded and 2.0 miles of new road segments. A total of 4.8 miles of historic road segments would be decommissioned or have already been decommissioned.

"The majority of the R-Line was retained by Green Diamond and is not part of the Community Forest. The segment leading from the first gate at Harris Street down to the second gate where the road splits is Green Diamond property. *At the second gate, the R-Line continues to the left and the 0.23-mile segment from the second gate to the third gate (situated near a bridge over Ryan Creek) is part of the Community Forest.* The remainder of the R-Line, situated east of Ryan Creek, is owned by Green Diamond and is not part of the Community Forest."

CEQA Document Page 12 reads "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 not 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."

***Contradiction Number Two - Roads are mapped for pedestrian use***

The maps shown as 1-12 and 1-13 and all following maps show that the first segments of R-road mapped as a "Multi-Use Road" with pedestrian, equestrian, bicycle, pedestrian versus heavy equipment, normal road traffic and logging trucks. This seems incompatible with the goal of creating a safe trail system.

Map 4-2 shows the Green Diamond road (previously mentioned as not part of the trail system) now being part of the "Multi-Use Roads" on the "Proposed Trail System."

***Contradiction Number Three - Trails are not roads***

Dec 2020 Page 16, Table 2.2 Does not mention people and recreation sharing trails with vehicles. The entire page is "trails" - not a single road or mixed-trail/road entity. Also this table does not mention partnership with adjacent or inholding landowners in the list of consulting and affected entities.

Dec 2020 Page 19 has the first reference to "Multi-use Roads". Since there's no liability to the County on recreational lands, if a logging truck runs you over while you were out birdwatching, you have no basis to sue - because the system was designed to hold heavy and light motorized traffic as well as equestrians, bikers and pedestrians including families with children and toddlers.

**Incompatible with Project Goals**

The plan describes 11.1 miles of multi-use roads, nearly equal in length to 11.7 miles of multi-use trails.

"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."

Trail users were defined in this document as (with the potential exception of electric bicycles and motorized scooters) pedestrian or equestrian users. The incompatibility comes from Grandmothers, toddlers and logging trucks on the same "Multi-use Road" does not make a safe and secure environment for a diversity of trail users.

**The project is not fully described or explained**

**"**Additional trails may be considered in the future." CEQA is supposed to cover the impacts of the project not defer it off to some unknown possible time in the future.

Dec 2020 page 26 says more roads inside the project area are able to become Multi-use roads, and suggests that road construction would be ongoing for 20 to 30 years. It doesn't provide a schedule of construction, nor any wildlife or plant impact assessment from noise, dust, and/or disruption from construction activities. This is incompatible with "Goal 3: Protect the Community Forest's natural and cultural resources."

The idea of natural areas is less roads, not more roads. I realize that timber harvesting will be continuing, and logging trucks and equipment more common than in areas more lightly managed, but this document is entirely unclear on the impact of these heavy industrial activities on the Goal of providing a safe recreational area.

Map 1-12 shows the R-road and the road to inholding as being maintained as roads, but there is a gap in the North to South road system south of the Private Inholding, going around that bluff. How will that affect fire fighting or emergency response? There seems to be no easy real access road to the larger, southern portion of the tract. The trees are too dense in most areas for helicopter rescue. There does not appear to be a current map of roads for rescue and firefighting, the only mention of such is that it will be prepared some time in the future. Those sorts of documents are supposed to be part of CEQA so the public can make informed comment on the potential project impacts.

Please clarify the segments of the R-roads which will and will not be part of the trail system as described in this CEQA document because all the maps show that the entire trail system is based off “Multi-Use Roads” which are all on the R-roads, some of which belong to Green Diamond - in direct contrast to statements from both documents.

Please clarify why you think it is a good idea to put pedestrians, equestrians and heavy trucks, light trucks, and household vehicles on the same “Multi-use trail” at the same time? The whole goal of walkable cities and walkable environments is to separate the pedestrian from wheeled traffic; bicycles from cars and trucks - for safety. Please describe in detail the studies which show that this goal, being sought by government planners worldwide, is shown conclusively to be without merit.

**The second portion of my comment relates to Ability and Disability**

Dec 2020 Section 2.4.2 Trails fails to mention Handicapped Accessible Trails at all.

Both before and after this section, Dec 2020 spends several pages with drawings of how to create mountain bike trails and features which is not in the spirit of “Goal 2: Promote a safe and secure environment for visitors of all ages and abilities.” Placing a rock in the expected pathway of bicycles is asking for an accident - here it’s supposed to be an improvement.

Both documents spend far less space discussing and illustrating how to accommodate handicapped people under the Americans With Disabilities Act (ADA) although national standards are referenced. Anyone who has ever applied any standard to a locational situation knows that additional drawings and information will be needed to actually build it. CEQA is supposed to show all impacts. Construction is an impact.

View the Map document and compare how much distance is granted to elderly and handicapped - including the cheap general cost of it based on needing to be “flat” versus the large engagement and high cost of developing the mountain bike playground at the north segment of the McKay tract (or next to the parking lot at the Northridge Access point as shown on the one page detail of the playground elsewhere in the document). Notice the lack of accessible handicapped parking places near the proposed “In-and-Out” accessible trails versus the intent to provide Equestrian spaces with room for trailers and off-street unloading areas.

Let’s check in with being fair to everyone, not just the wealthy and physically able. Horseback and mountain bike riding is likely to make more handicapped not less ( ex: Christopher Reeves and thousands more who have lost some or all mobility due to horse and bike accidents). What if the trail system and the parking started out more equal instead of the bicycle playground being mapped pretty much to the last rock while the elderly/handicapped trails get postponed to later - if at all - because the MOU hasn’t been executed yet which would enable half of the handicapped access, or the property hasn’t been acquired yet, or any of the other delays and excuses listed in these two documents? I don’t see similar excuses or delays for the mountain bike playground which - despite goal # 2 - is not going to be accessible to anyone but bikers.

Notice several more pages in these documents diagramming how mountain bike trails get built and how regular trails are built in the section following the ADA section, but no similar diagrams for the “accessible” segments. (Dec 2020 pages 31 -33) (Dec 2020 4.12 Bike Skills Park, page 55 and Attachment two - seems to be a bike park at Northridge Road with parking while elsewhere the playground is near Harris.)

**Lack of documentation prevents public input**

It is impossible to get input from the disabled/abled community when there is no actual plan for trails which they can use in the CEQA document. ADA is not just about getting the end product right when and if you get around to it, but also including members of the community in input and the CEQA process.

For example, Table 2-7 only says “additional clearance at turns.” That’s basically nothing said for something super important because that number changes - sometimes a lot - on corners at grades up or grades down. Is this trail also likely to have a pile of horse manure in the middle of it? Would that perhaps change the turn around radius of

someone putting their hands on their tires or drive wheels? How do you intend disabled to get around the gates marked on your maps? How are you going to maintain these trails so they don't get rutted by mountain or electric bikes and become unusable for motorized or hand-driven wheelchairs. None of this is addressed. Please compare and contrast with the down to the last board and rock details on the mountain bike playground, the bridges, and the trails for the abled. This isn't fairness - it's more discrimination. The only actual details are presented on Maps 4-12 & 4-13 Dec 2020 Trail Guide and even those are far less than provided for other users.

**This section is too incomplete to understand the potential impacts**

This section needs work. It's not fair or even in presentation compared to the other types of trail users. The only description of length or position is left to the maps which elsewhere are stated to be general and subject to modification. It has no site specific considerations, a lack of parking at two of three considered access points and no MOU to enable the eastern Gate at Redwood Acres to open for handicapped with no handicapped parking for that gate specified. The whole thing looks like it was copied and pasted from some handbook and that no actual thought has been spent on elderly and disabled planning despite full scale build-out drawings for the mountain bike playground (in two locations) and build-out drawings for regular trails and a road undercut elsewhere in the documents.

**The third part of my comment discusses waste**

Dec 2020 Trash receptacles does not mention bird proof containers although this was considered of great importance in prior CEQA documents and is the North Coast standard for trash cans. Please include bird-proof-trash cans as part of the design.

**No mention is made of how waste will be removed from inside the forest**

It does not appear that you plan to compost the yards of horse manure and dog manure which will appear on your trails daily. Since the area adjoins urban areas, this will lead to an increase in rat population which is not addressed anywhere in these documents.

There is only one mention of horse manure disposal in the entire document, it's only for one of the three proposed access points. I do not think this is sufficient planning for something which is obviously going to create situations of increased nutrient run-off into the streams, biohazard, navigation hazard and increase in rodent populations. Rats eat horse and dog poop, in case you're not aware.

Human waste is not addressed at any point except Northridge which "might" someday maybe get a porta-potty or bathroom. No human waste disposal points are listed for the other entrances despite the heavier apparent anticipated use to in the north part. Where are you planning for families with children who go to the bike park to go to the bathroom and dispose of human waste? Otherwise, there are biohazard issues, runoff issues and general all-around "you stepped in what?" and the toilet paper behind every tree so obvious in other areas where no services are provided.

While protecting the private inholding's water line from trampling is mentioned on Dec 2020 page 51, the documents have no protection for the source of that water line which is an existing spring. What's to stop people or horses from wandering into the water source for this family, defecating in or near the water and getting people sick? At a minimum, horse, mountain bike and people-proof fencing should be provided to prevent damage and illness to the family who was there before the acquisition or County plan.

**Any reasonable person knows waste will be generated - "no impact" is not possible**

I realize poop waste is gross and disgusting, but it needs to be addressed because this project is built to attract people, dogs and horses, all of whom create waste. We know water runs down hill. We know waste contains pathogens. We know from the documents there are large amounts of wetlands. We know there's a stream that dumps out in Humboldt Bay. We know there are Oysters in the Bay and a family in the house. We know untreated

human and horse waste creates disease. This should be planned for - not ignored. The section that says there is no impact from this is not accurate.

**The fourth part of my comment discusses access points**

Dec 2020 Part 3 Access Points Table 3-1 page 41
Range of time for start of these points is within 5 years. Why are only three covered in CEQA document? This seems like piece-mealing - dividing the project into small pieces to attempt to minimize impacts.

**Northridge Access Point**
The Northridge Access Point seems to be ok as described, but there is no handicapped parking. Elsewhere it shows the bike playground here - which would make a lot of sense. This is the location with the real off-street parking where families could off-load kids and bikes without fear of rapid arterial street-side parking. This also could be a good location for horse manure composting or dumpsters for waste. I was really disappointed that this location was bypassed in favor of Harris street for amenities which I really feel belong at Northridge.

**Harris Street Access**
Harris Street access is from a busy arterial, with what might be considered on-street parking, but the crossing of which midway down a slope on a speedway, looks like a way to get people hurt or killed. There's no handicapped parking here at all. Crossing Harris without a cross-walk is asking for trouble. As an elder, I wouldn't even try it. We all remember Dave Silverbrand's tragedy when his wife was struck and killed at the bottom of the speeding hill over by the school. And she was in the crosswalk.

Dec 2020 Page 43 *"The County may consider future crosswalk enhancements such as traffic signs, high visibility crosswalk markings, bulb-outs, and/or a new street lights."* More cutting the project impacts in pieces and wow, how generous that you may consider life-safety improvements, maybe at the primary entrance for one of the two possible locations of the mountain bike playground (i.e. lots of kids) where there is no safe place to unload or cross the street. The off-street parking offered by the Redwood Acres is only when not in use for their events and programs and over 700 feet away, it is not handicapped accessible to this entry point. Trying to walk a pile of kids and bikes 700 feet and across an arterial street is not convenient or safe parking.

Dec 2020 Page 44 "A pedestrian safety project to improve the cross-walk between Parking Lot A and the main site is scheduled for 2019." This document is dated 2020 and put out in 2021. Either this has or has not been done - either way one would assume this information could be factual. Unseen obvious overlooked items like this cause doubt in the accuracy of the remainder of the document.

CEQA Document Page 12 reads "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 not 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." Those enhancements should be part of this CEQA document, otherwise you are piece-mealing again.

Dec 2020 page 44 creates additional confusion. It has both a Photo and a Map showing Green Diamond Access Road with Gate. Is this the R-road? It is not labeled. How would you keep pedestrians off the Green Diamond Road which is not part of the Community Forest but which you have mapped as "Multi-Use Roads"?

The diagram has a crosswalk as "E" (but which does not appear to actually be there in your photograph) and new concrete bumper in the parking lane which goes too close to the inroad bicycle lane you just marked off on Harris a

couple of years ago. Please do not sacrifice the safety of road bicyclists in your hurry to put a drainage obstacle in the parking lane of the downhill grade of an arterial street.

Dec 2020 Page 44 The Memorandum of Understanding has not been executed, although the document continues to describe exactly how the county wants to use the Fairgrounds! Isn't it correct to better any MOU first, before assuming this is all going to be ok with their board?

Dec 2020 Page 45 describes the other proposed trailheads, which are mentioned but not included in this CEQA creating a situation where it is impossible for the average person to understand the scope of all the impacts to the forest from future development which is known to be occurring in the not too distant future.

**The fifth part of my comment references deferred trail construction & emergency response**

Dec 2020 Page 51 "Heading south from Redwood Acres, the main trail in this unit occupies an existing logging road at the bottom of the Ryan Creek valley.To avoid conflicts with the private inholding, a new trail traversing the hillside east of Redwood Fields is proposed. Due to topographic constraints, an encroachment onto the east side of the McKay Ranch subdivision is necessary (Map 4-8). Trail construction will need to avoid damaging the water line to the inholding residence."

Compare and contrast with:

Dec 2020 Page 57 "Construction of the North McKay trail unit will be deferred until the trail encroachment onto the McKay Ranch subdivision is formalized." No mention of how this area is to be accessed is included in the document - although this is the section where there is a private inholding currently using Green Diamond Roads for access and delivery. This section should describe why this necessary separation of humans and traffic is being postponed indefinitely and made contingent on some other event. Isn't that the textbook definition of Deferred Mitigation?

No timeline is given for protecting the waterline. No map was provided. 4-8 is for the east side of the ranch… not the constrained upper portion.

**The sixth part of my comment is about emergency response**

December 2020 Page 58 The maps show that proposed trails/roads trade back and forth, there is no single road circulator. I gave up on trying to figure out how you would drive a fire truck around in here based on the road appearing and disappearing as it does on your maps and would suggest there is inadequate mitigation for fire and emergency road use - mostly because the road disappears into trails you describe as not big enough for them to use.

A trail map showing the emergency response routes should be available now in this document, not deferred to some unknown time in the future. County workers could be placed at risk by lack of valid mapping for Emergency Response teams. The document doesn't state who will do the response. Is that clearly defined somewhere? Why is that not part of this document?

The public cannot decide if the emergency response ability is sufficient to prevent impact without complete and accurate information which is the point of CEQA.

**The seventh and final part of my comment is in regards to CEQA impact statements.**

**CEQA document Page 52 — XVII. Transportation (c)**

I disagree with the "no impact" conclusion of XVII. Transportation (c) as this would increase hazards to to geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment). "Multi-Use Roads" when one use is Logging Trucks and another use is people with dogs and baby strollers is totally an increase in hazard. Right now those roads are logging trucks and delivery vehicles and traffic to the private inholding. That's not compatible with "walk in the park" and kids on bikes at all. I think the point was missed. This section is not just

about stuff outside the Community Forest if you are leaving “Multi-Use Road” inside the forest with logging trucks… that’s Transportation… that’s incompatible use. This needs to be mitigated as it is not a “no impact” item.

Additionally, as no provision was made for the safety of the people “on-street parking” at Harris, nor for the crossing of the R-road at Harris, I feel that this “no impact” is also incorrect.

CEQA document Page 53 “The Community Forest will be used primarily for non-motorized recreational purposes and incidentally for transportation.” As long as it has incidental transportation by motorized vehicles you need to mitigate for the potential and literal impacts between 40,000 pound trucks going 45 miles per hour and small 35 pound children going 2 or 3 miles an hour.

CEQA document Page 54 claims the project has no impact to public roads, however it seems to have a great deal of impact to the private property R-road which is supposed to be on Green Diamond land - but yet is shown as a “Multi-Use Road” thereby becoming public access on all the maps.

**CEQA document Page 56 — XIX. Utilities and Service Systems**

XIX(b) is said to be no impact “IF a restroom is added”, but that’s not included in this CEQA so it cannot be stated as “no impact.”

XIX(d). I disagree with the “no impact” when prior you discussed having to have a Horse Manure Disposal site at the Northridge entry point. Also with no place for humans to deposit waste, I do not feel you can put a “no impact” checkmark here. You also should be accounting for dog waste. “In excess of State or local standards” - I think if you check depositing poop along Ryan Creek and in it’s watershed without septic or other treatment is not up to state or local standards for solid biohazard waste.

Mitigation Measure Util-1 What protection is being offered the spring from which the water derives? What if equestrian riders let their horses poop in the domestic drinking water supply of the inholding? I would think at a minimum horse and mountain bike proof fencing around the spring would be required, but none is listed in the CEQA.

**CEQA document Page 57 — XX. Wildfire**

XX(a) I disagree with “no impact.” The maps show gaps in the “Multi-Use Roads” which are not there now and this would change the circulation and emergency response plan and ability to respond.

XX(b) More people will be doing more smoking and more fire in the forest. Having the roads actually be clear from end to end is really important. Your plan cuts the roads off into segments interspersed with trails not suitable for firetrucks. This does not result in less-than-significant impact.

**CEQA document Page 59 — XXI Mandatory Findings of Significance**

XXI(b) I disagree with “less than significant impact” due to the piece-mealing of the phase one and phase two entrances, the cumulative effect of the project may be quite different from what is laid out in this “first” CEQA document. If a second one is so anticipated that you use the word “first,” then you know you are piece-mealing and this “less than significant impact” needs to be raised to “Potentially Significant” as you have provided no mitigation measures.

XXI(c) I disagree with the no impact on “environmental effects, which will cause substantial adverse effects on human beings either directly or indirectly,” because making people use roads with logging trucks is going to have impacts - mostly on the people from the trucks. That would be a substantial adverse effect because the County as land-owner could not be sued under the Recreational Trail Immunity - California Tort Claims Act. Thus walking on these Multi-Use Roads is at one’s own risk with potential logging trucks whipping around the corner at any second. The Humboldt Bay area has a history of horrific accidents between vehicles and people who were until then just

enjoying life. It is impossible to forget the death of a beloved geography lecturer at HSU and her running dog Maggie, struck down in the prime of life while jogging with two friends - who were themselves gravely injured - only eight years ago.

I simply cannot believe the county would create a situation whereby people, baby carriages, dogs, people in the prime of life and enjoying being outdoors in peace would suddenly encounter a large motorized vehicle on the same "Multi-Use Road" inside a Community Forest. The concept just goes against every single thing we expect in a nature walk - and from a Planning Department. This is Planning to Have Another Fatality - not planning a walk in the park.

**Conclusion**
My major concerns as described above are

1) Difficult to impossible for average person to understand the impacts of the project.
2) Because of two documents and multiple internal contradictions, it is impossible to know the plan which is "mitigated negative declaration" when relevant information is not provided.
3) Inconsistent with Trail Plan Project Goals
4) Project is piece-mealing, deferring mitigation and not well described
5) Entry points and bike park plan documents contain contradictory information
6) Insufficient parking and safe access at Harris
7) Contradictory possible bike playground locations.
8) Inadequate planning for human and animal waste, public safety and emergency access
9) Unfair process and unequal facilities for elderly and handicapped people
10) Lack of Memoranda of Understanding with Redwood Acres

The absolute biggest problem with this project is that

11) Multi-Use Roads are a system you've **designed with human injury and mortality as expected events**, from which no financial recompense is possible due to the state Trail Liability Act. Thus someone could be injured, acquire huge hospital bills which would be entirely their own responsibility, and end up homeless when all they wanted to do was walk the dog, watch a bird or ride a bike on a pretty trail.

The fault lies in the planning process; all human/animal to vehicle collisions would have been preventable with a plan which did not accept injury and mortality as one of its starting points.

The project fails to provide safe recreation on roughly half of the available trail distance.

Situations which bring to mind the death of Mrs. Silverbrand and the runners on Old Arcata Road abound on these R-1 roads - bends, turns, twists, grades.

It's unbelievable that anyone would find mixing logging trucks and toddlers acceptable. I don't.

I really hope you take this project back and work on it some more before bringing it to the supervisors.

Sincerely yours,

Ellin Beltz
Ferndale, California
[redacted]

## Seemann, Hank

**From:** Bruce Cann [redacted]
**Sent:** Monday, January 18, 2021 8:44 PM
**To:** Seemann, Hank
**Subject:** Comments on the McKay Community Forest Plan

Hello Hank…I think you and your team did an excellent job in writing this plan. Thank you for incorporating many of the comments expressed by the public throughout this planning process. I really don't have much to suggest other than an interest in learning how the ordinance will be developed. There will be a lot of interest in formulating appropriate rules and regulations. Could you provide more details regarding this topic? The only other concern I have is the potential for a forest fire and the threat it might pose to (during a wind event coming from the east) nearby residential neighborhoods. I have 40 years of wildland fire experience and the last five years or so have blown my mind as I observed first-hand several firestorms ravage the landscape due to extreme east or northeast wind events during low humidity and high temperatures. It might be prudent to consider short-term temporary public closures when these extreme situations are predicted to occur.

Thanks again for the opportunity to comment on your great plan! I look forward to helping out on whatever needs you may have.

Take care,
Bruce Cann

## Seemann, Hank

**From:** Dean Howatt [redacted]
**Sent:** Tuesday, January 12, 2021 5:52 PM
**To:** Seemann, Hank
**Subject:** Comments-Initial Study McKay Community Forest Trails Plan

Dear Mr. Seeman

I am writing to oppose the adoption of the mitigated negative declaration on the CEQA study for the McKay Community Forest Trails Plan. While I favor almost all aspects of the trails plan and environmental study I do not feel that the proposed Bike Skills Park has been adequately addressed. The proposed sports facility is a departure from the stated goals in the Trail Plan. Potential problems include noise and parking issues for residents in the Northridge Road area. Comments in letters from Mountain Bike Riders claim that attracting large crowds of tourists from out of the area for organized sporting events is a benefit. I can't see how this fits the stated goal of learning and connecting with the natural environment. Concentrating forest users in one area will impact wildlife and drive away other visitors.

The roughly 5 acres desired for the Bike Skills Park is desirable to many other users for the same reasons that the Redwood Coast Mountain Bike Associations wants their dedicated use. It is relatively flat and close to a public access point. My personal observation from 35 years of hiking in this part of the forest is that it provides easy and enjoyable trails for those who don't have a lot of time or whose physical abilities don't allow for hiking on the steeper trails. I think the Bike Skills Park will drive away other users and have a negative impact on the forest and the adjoining neighborhood.

Thank you for all of the hard work that has gone into creating the McKay Community Forest Trails Plan.

Dean Howatt
5344 Northridge Road
[redacted]

## Seemann, Hank

**From:** Melanie Mccavour [redacted]
**Sent:** Tuesday, January 19, 2021 2:08 PM
**To:** Seemann, Hank
**Subject:** Re: McKay Trail Plan CEQA document comments, M.McCavour

Dear Hank,

Here are my comments on the MND as of today. Please consider them as public input, and I am okay with including my name (as is required for written comments).

Another two weeks of public comment period should probably be added. Although I do not need that long personally (a few days suffice), I worry that given that this was uploaded to CEQAnet database on Dec. 20th, open only during the holidays, a COVID resurgence and a period of social unrest, and closing the day before Inauguration Day, very few people from the public will have had awareness of the plan, or time to review it.
This point is reinforced by the fact that someone who regularly checks the database ( myself), did not check it at all over this period of time.

Additionally, I'm concerned that like us, people who live or own property within 500 meters of the " project" (plan ), were not notified.

I would strongly recommend following CEQA/ NEPA best practices and notifying the affected public , and consider offering an online Q&A meeting or poster session for the interested public. Given that this is a community level plan, arguably the affected public is vast.

As for the R road, I and other residents of 3300 Harris St. could not understand why you say that the road is not an issue, as it's mentioned as an access point many times, throughout the document. Indeed, the multiple times the road is discussed serves as a reminder to the reader that there are a few missing impacts under at least two of the resource categories ( related to transportation, safety, utilities, and services) in this regard.

One cannot list it as an access point, with nearby parking provided, and provided signage and amenities, but at the same time, argue that there is no access to the road for multi use, because it is strictly a road currently, NOT a trail.
Perhaps Public Works isn't aware of just how many people/ pets/ bikes/ motorbikes are on the road every day (high numbers).
The majority of these people believe that the road is a trail and see vehicular traffic as an unfair and questionable burden on their ability and perceived right to be all over the road.
This is actually a huge problem, and omitting disclosing the impacts (the CEQA is after all a disclosure law, with mandatory mitigation built in to the project description for MNDs), and omitting mitigation for this situation (for example, closing the road to foot/ bike traffic entirely, or setting side trails that are clearly demarcated, and putting up MANY signs advising people that it is NOT a trail, and that pedestrian/ bike use is at their own risk of danger or fine) is I fear a major oversight with dangerous repercussions.

I am sure that GD is likewise not reassured by the one line in the MND that states that there should be no foot traffic on the road, contradicting the rest of the document that refers to it as an access point/ multi- use road. Additionally, as the roads now stand, there IS NO way to traverse the road w/ o actually crossing it.
The USPS, other delivery service vehicles, county employees and sub- contractors also regularly use the road, as do we ( 2-6 vehicles, historically, depending on how many residents live on our 8 bedroom property.

I was told by CHP that the County would be responsible for any accident that might take place on the road, given the county easement and inclusion as part of a community- wide resource. I haven't found another example of a State or local park that has a trafficked road currently used as a trail (and referred to as such in an MND).

Regarding the water source to the residents, will there be enforcement of renegade trail use, and contingencies for an event where residents may start to experience water leaks due to trampling or other trail related damages?

Thank you for looking into compensation for the privacy fencing, as it has been a very large financial burden that has not even entirely mitigated the trespassing on to the property. We also covered the cost of a gate protecting the PG&E access point from trespassers as well. When do you think that arrangements might be made? (a time estimate). Would you like us to send you the invoices?

Finally, any word on whether we are to be reimbursed for the four years of road repairs?
Given the high level of traffic repairs/ maintenance is certainly not only due to our travels.

Thank you Hank, and please let me know what the timeline is for additional comments.

Sincerely,

Melanie

Melanie J. McCavour, M.Env., Ph.D.
Consultant, CEQA, NEPA Environmental Impact Assessment and Resource Management; Research Associate, HSU;
Humboldt County Planning Commissioner
[redacted]

On Jan 18, 2021, at 09:31, Seemann, Hank <HSeemann@co.humboldt.ca.us> wrote:

To: Hank Seemann
Humboldt County Public Works Project Applicant

Re: SCH Number 2020120382 Lead Agency Humboldt County Document Title McKay Community Forest Trail Plan Document TypeMND - Mitigated Negative DeclarationReceived12/18/2020 Present Land Use Forestland

https://ceqanet.opr.ca.gov/2020120382/2
https://ceqanet.opr.ca.gov/2020120382/2

*Contact Information*
Hank Seemann
Humboldt County Public Works Project Applicant
Lead Agency 1106 2nd St Eureka, CA 95501
hseemann@co.humboldt.ca.us
<hseemann@co.humboldt.ca.us>*
Phone : (707) 445-7741

*Document Description: Establishment of a trail network comprised of multi-use roads, multi-use trails, hiking trails, and mountain bike trails within the McKay Community Forest, with specified access points and amenities, including construction and ongoing maintenance.*

Dear Hank, please consider this letter, including the itemized (below) CEQA standards as public comment for the above listed Project.

This Project is not so much a trails plan, as a plan to locate trails on a road that is currently used as a road and driveway, by numerous residents and other vehicles, as well as for the sole emergency vehicle access to the residence.

To be clear, the residents are not at all against the community trails plan, and indeed, have worked closely with Public Works in facilitating it, sending numerous CEQA examples, and hosting site visits, etc.
It was a shock to recently discover that the County intends to make the road the actual trail, rather than put a trail through the forest, as was originally envisioned.
We've been in contact with Mike McGuire's office as well, and they stated that they would love to help find funds for an actual (and safe) trail.

It is getting more and more dangerous for everyone, with people (including many children) dogs, people on bicycles and motorbikes, and vehicles all occupying the road, as there are many sharp turns, and no lighting. Of course, it is highly dangerous for anyone with a disability as well, and the Plan makes it look like there is a nice gravel road to use (no signage saying it is in fact a motorized road). I'm fairly certain that the public is not aware that "due to money constraints", the County has decided to put everyone at risk by putting people on a motorized

road.  In addition to people at the residence, there are also GD, USPS, other delivery services, PG&E, county and contracted employees, and others.
If you look at the MND, none of the safety concerns are addressed at all (no boxes checked).

I include below some CEQA standards.

**CEQA Standards**

3.4.21-1. Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects? (CEQA XIXa)

Standard of Significance: Construction of new water, stormwater, wastewater, electric power, natural gas, or telecommunication facilities or expansion of existing facilities as a result of the Project constitutes a significant impact if new construction creates significant and immitigable environmental effects.

Environmental Analysis: **Significant impact**

The Project proposes to construct a pedestrian and bike trail over the Community Services District water supply line to the residence located approximately 500 m below the trail. The Project proposes to bury only a small portion of the pipe, that will be directly on a trail of the proposed Project, but does not address protection of the remaining many linear ft of pipe adjacent to the trails that the trail system encompasses. There is sufficient evidence to suggest that additional sections of the community services water piping, currently running largely above ground, will be at risk of rupture and contamination, entailing future additional impacts. There is no mitigation plan to address heightened risk to the Community Services water piping and access, no scheduled water quality testing proposed, nor is there a plan should the proposed method of protection fail.  Community Services has kept a history of such ruptures (due to community forest use by people who believe it is open, or by people who use it despite it not being open), should the applicant wish to inquire. Additionally, there is no mitigation suggested to protect via enclosure, the existing spring that the residence has water rights to.

3.4.19-3. Would the Project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (CEQA XVIIc)

Standard of Significance: Substantial increases in hazards resulting from the Project proposal or incompatible use of the trail create a significant impact.

Environmental Analysis: **Significant Impact**.
Use of the current motorized road as a pedestrian trail means that dangerous intersections, sharp curves, and incompatible uses are proposed. The Project would be located on and follow

the dirt/gravel utility and residential road (continuation of Hubbard), that leads to a residence. In addition to the trespassing and liability impacts, there is a significant adverse impact to the public and residents associated with location of a pedestrian trail on an access road that serves as the principal and only driveway and motorized access to the residence. The road is currently used by multiple residents residing at 3300 Harris St., their visitors, PG&E, various county and private contractor employees, as well as the USPS and other mail and parcel delivery trucks. Additionally, Eureka City Schools bussing does not travel down the road, so two or more children are currently driven to the road at least 70% of all school trips.
The road would be used by residents and visitors in the area, and therefore incompatible uses would interfere with trail use, and are a significant public safety concern. There is no mitigation proposed, other than signage (inadequate, due to the promotion of use of the road as a pedestrian trail, and high risk), and no there are no alternatives proposed or considered, such as location of pedestrian trails through the community forest (the Plan, as explained to the residents when the County started the planning process), or at a minimum, an alternative well divided trail to the side of the existing motorized road.

3.4.19-4. Would the Project result in inadequate emergency access? (CEQA XVIId)

Standard of Significance: Inadequate access for emergency responders during Project construction and operations constitutes a significant impact.

Environmental Analysis: **Significant Impact**.
The proposed use of a current motorized utility and residential access road significantly adversely affects residential access to emergency services, as well as to residents and visitors to the trail system. In particular, there would be a significant hazard to residents and visitors should the residence located at the end of the road require emergency services such as fire services, medical services, or police services. Given the residence's location in the forest, the lack of access in case of wildfire is of increasing concern.

3.4.19-10. Will the Project result in an increase in traffic hazards to motor vehicles, bicyclists, or pedestrians? (TRPA 13f)

Standard of Significance: Increases to traffic hazards on trails and at trail crossing locations.

Environmental Analysis: **Significant Impact**.

The Project will increase traffic hazards by designating a pedestrian trail and bicycle path on an existing motorized road, with no bicycle or pedestrian facilities, and because it does not create a Class 1 trail or other safe access or path off the road to create a non-motorized trail away from the existing road, nor does it provide a trail with safe linkage between uses. Traffic hazards are made high by designating an existing roadway as a pedestrian path, and poses a significant hazard to the residents living at the end of the road, as they make their multiple trips

per day in and out of their residence for work, K-12 schooling, and other activities expected from residences. Additional impacts to the residents located at the end of the road are introduced by increased pedestrian, bicycle, and motorbike encroachments on real property, and through lack of a gate where the trail intersects the road close to the residential property, inadequate or absent signage, fencing, or other measures required to delineate private property from public property.
Additionally, Public Works initially agreed to fund the cost of privacy/safety fencing and gates but has recently refused, and though is required to maintain the road, has not maintained the road since 2014. The private residents have instead solely maintained the road from the fork (Green Diamond gate leading to their private land) since 2014, without compensation, but with the understanding that the use of the road by others is prohibited. The residents have also experienced four home break-ins and thefts of property, and one violent attack since 2014.

**Additional Comments**:

Another point is time of posting and notification. Was EMS notified? The residents at the end of the road were not notified until a few days before the CEQA MND deadline. Additionally, the residents have never received notification regarding any of the comment periods preceding this open period. Given that this was uploaded to CEQAnet database on Dec. 20th, and open only during the holidays, a COVID resurgence and a period of social unrest, and closed the day before Inauguration Day, it is likely that very few people from the public will have had awareness of the plan, or time to review it, even if they were notified.

The MND is incredibly inconsistent in its description of the R line road (the one in question here). One cannot list the road as an access point, with nearby parking provided, and with provided signage and amenities, but at the same time, argue that there is no access to the road for multi -use, because it is strictly a road currently, NOT a trail.
It is hard to imagine that Public Works isn't aware of just how many people/ pets/ bikes/motorbikes are on the road every day already, because of the misleading signage on Harris that makes it look like a hiking trail. Additionally, there IS NO way to traverse the road w/o actually crossing it.

There are multiple instances where the Project describes the road as a proposed trail, and in a few other instances describes it as a trail that "they are working on", once "issues" and MOUs are resolved with residences and private development land owned by McKay Ranch.
Under CEQA, the Project cannot mitigate for impacts, or claim that there are none under circumstances where the Project is not fully planned out, and MOUs are left unsigned. The residents will not be signing MOUs under these circumstances, and it is likely that the public will feel unsafe using land that has not been adequately evaluated for impacts, safety, and legality. It is also likely that many of the public will be unaware that trail immunity by the County will be attempted, as it is allowed by the State in some cases, but only when the land is used for the stated purpose of recreation. The CHP has stated that the County could be responsible for any

accident that might take place on the road, given the county easement and inclusion as part of a community- wide resource.
A search for an example of a State or local park that has designated a trafficked road as a trail (and is referred to as such in an MND) failed to find such an example.

The MND does not disclose the impacts, omits mitigation, and excludes alternatives (the CEQA is after all a disclosure law, with mandatory mitigation required to be built in to the project description for MNDs). Alternatives would be closing the road to foot/ bike traffic entirely by creating and using in- forest trails that are clearly demarcated, with adequate signage directing people away from the road, or at a minimum, creating a separated trail with bicycle posts to the side of the road, along with MANY signs advising people that the road is NOT a trail, and that pedestrian/ bike use is at their own risk of danger or fine. Additionally, more signage, fencing/gating, and mention of the residence is necessary to mitigate risks to residents, in addition to the Emergency Services lack of access, and public safety on the road. The County maps do not even show the private residence on many of the maps, instead labelling it simply as “McKay Tract”, with the rest of the forest.

Sincerely,

Melanie, David, Tristan and Gareth McCavour Greene