



**CITY OF EUREKA
COMMUNITY DEVELOPMENT DEPARTMENT**

Lisa D. Shikany, Principal/Environmental Planner
531 K Street • Eureka, California 95501-1146
Ph (707)268-5265 • Fx (707) 441-4202 • lshikany@ci.eureka.ca.gov

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

NOTICE IS HEREBY GIVEN that pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15072 & 15105, the City is providing notice of an “Intent to Adopt a Mitigated Negative Declaration of Environmental Impact” for the project described below. This Notice of Intent serves as public notice that the City of Eureka (City) has prepared an Initial Study and proposes to adopt a Mitigated Negative Declaration for the Eureka Waterfront Trail Project (proposed project). A Mitigated Negative Declaration has been prepared because no substantial evidence exists that the proposed project may have a significant environmental effect that cannot be fully mitigated to a less-than-significant level. The proposed Mitigated Negative Declaration does not signify approval or disapproval of this project by the City’s decision-making body. The City will consider the proposed Mitigated Negative Declaration together with any comments received during the public review process to determine whether the proposed project would have a heretofore unidentified significant impact on the environment. Any public hearings regarding this project that may be necessary will be duly noticed as required by law.

Project Title: Eureka Waterfront Trail Project – Phase A

Project Applicant: City of Eureka Parks and Recreation Department

Case No: ED-14-0001

Project Location: The project is located in northwestern Eureka paralleling the coast of Humboldt Bay from Del Norte Street (northern terminus) to Truesdale Street (southern terminus). The project alignment would be within the right of way (ROW) of the North Coast Railroad Authority (NCRA) railroad, which follows the coastline south, with the exception of two short segments of the trail that would temporarily leave the NCRA alignment — one that enters into a former Pacific Lumber Company (PALCO) property referred to as “Parcel 4” and the other that parallels the northerly portion of the west boundary of PALCO Marsh — before rejoining the railroad ROW and continuing south past the Chevron Terminal to Truesdale Street. The project alignment would pass through Assessor’s Parcel Numbers (APN) 007-031-004, 007-031-003, 007-031-002, 007-051-002, 007-051-009, 007-061-002, 007-071-003, and 007-071-014, and would cross through Sections 21, 22, 28, and 33 in Township 5 North, Range 1 West on the Eureka, California 7.5-minute U.S. Geological Survey quadrangle, Humboldt Base and Meridian.

General Plan & Zoning Designations: **Zoning**—Public (P); Coastal-Dependent Industrial (MC); and Natural Resources (NR). **Land Use**—Coastal Dependent Industrial (CDI); Community Commercial (CC); and Natural Resources (NR).

Project Description: The City is proposing to construct an approximately 1.2-mile long segment of Class 1 multi-use trail from Del Norte Street south to Truesdale Street. The project, also known

as “Phase A,” would be an extension of a trail (“Phase B”) that is proposed to follow the Humboldt Bay coastline along the Eureka waterfront. (A Mitigated Negative Declaration was adopted for Phase B in July 2012, State Clearinghouse Number 2012052053). The project purpose is to further enhance non-motorized and pedestrian connectivity, and increase public access to and along Eureka’s waterfront on Humboldt Bay. The project is intended to encourage nature study, appreciation of the environment and historic uses of the area, increase opportunities for active living to improve public health, increase the safety of non-motorized transportation, improve public safety, and recover native vegetation community values where possible. In addition, the project seeks to reclaim an area that is frequented by transients and the local homeless population and in which significant accumulations of trash and other waste have occurred. The proposed alignment is an important piece in the statewide initiative to complete the California Coastal Trail. The proposed Eureka Coastal Trail system (which includes Phase A) and associated coastal access improvements are key elements in the City’s General Plan and Eureka City Council’s Strategic Plan 2013-2018.

The Phase A trail would generally consist of a paved section designed to accommodate emergency vehicle access and two unpaved shoulders. Project-specific improvements such as elements of the multi-use trail, trailheads, parking, landscaping, street crossing(s), roadway/sidewalks, lighting, and signage were included in the project design. Improved safety elements would include improved trail surfaces (as deemed appropriate), American’s with Disability Act access, and signage.

Review Period: As mandated by Public Resources Code § 21091, the minimum public review period for this Initial Study and proposed Mitigated Negative Declaration is 30 days. The document has been sent to the State Clearinghouse. The 30-day public review period commences on September 15, 2014. Written comments must be submitted no later than 5:00 P.M. on October 14, 2014, and should be submitted to:

City of Eureka
Community Development Department
Attn.: Lisa D. Shikany
531 K Street
Eureka, California 95501
Phone: (707) 268-5265 Fax: (707) 441-4202
email: lshikany@ci.eureka.ca.gov

Document Availability: Copies of the Public Draft Initial Study and Proposed Mitigated Negative Declaration and supporting documentation are available for review during regular business hours at the following locations:

City of Eureka – City Hall
Community Development
Department, Third Floor
531 K Street
Eureka, CA 95501

City of Eureka – Adorni Center
Parks and Recreation Department
1011 Waterfront Drive
Eureka, California 95501



CEQA PUBLIC DRAFT - INITIAL STUDY

CITY OF EUREKA

PROJECT TITLE: Eureka Waterfront Trail Project Phase A

PROJECT APPLICANT: City of Eureka Parks and Recreation Department

CASE NO: ED-14-0001

PROJECT LOCATION: The project is located in northwestern Eureka paralleling the coast of Humboldt Bay from Del Norte Street (northern terminus) to Truesdale Street (southern terminus). The project alignment would be within the right of way (ROW) of the North Coast Railroad Authority (NCRA) railroad, which follows the coastline south, with the exception of two short segments of the trail that would temporarily leave the NCRA alignment — one that enters into a former Pacific Lumber Company (PALCO) property referred to as “Parcel 4” and the other that parallels the northerly portion of the west boundary of PALCO Marsh — before rejoining the railroad ROW and continuing south past the Chevron Terminal to Truesdale Street. The project alignment would pass through Assessor’s Parcel Numbers (APN) 007-031-004, 007-031-003, 007-031-002, 007-051-002, 007-051-009, 007-061-002, 007-071-003, and 007-071-014, and would cross through Sections 21, 22, 28, and 33 in Township 5 North, Range 1 West on the Eureka, California 7.5-minute U.S. Geological Survey quadrangle, Humboldt Base and Meridian. A regional map showing the project location is provided as Figure 1; Figure 2 shows the route of the proposed Phase A trail alignment (Appendix A).

ZONING & GENERAL PLAN LAND USE DESIGNATIONS: **Zoning**—Public (P); Coastal-Dependent Industrial (MC); and Natural Resources (NR). **Land Use**—Coastal Dependent Industrial (CDI); Community Commercial (CC); and Natural Resources (NR).

PROJECT DESCRIPTION: The City of Eureka (City) is proposing to construct an approximately 1.2-mile long segment of Class 1 multi-use trail from Del Norte Street south to Truesdale Street (project) (Figure 2, Appendix A). The project, also known as “Phase A,” would be an extension of a trail (“Phase B”) that is proposed to follow the Humboldt Bay coastline along the Eureka waterfront. (A Mitigated Negative Declaration was adopted for Phase B in July 2012, State Clearinghouse Number 2012052053). The project purpose is to further enhance non-motorized and pedestrian connectivity, and increase public access to and along Eureka’s waterfront on Humboldt Bay. The project is intended to encourage nature study, appreciation of the environment and historic uses of the area, increase opportunities for active living to improve public health, increase the safety of non-motorized transportation, improve public safety, and recover native vegetation community values where possible. In addition, the project seeks to reclaim an area that is frequented by transients and the local homeless population and in which significant accumulations of trash and other waste have occurred. The proposed alignment is an important piece in the statewide initiative to complete the California Coastal Trail (CCT). The proposed Eureka Coastal Trail system (which includes Phase A) and associated coastal access improvements are key elements in the City’s General Plan (City of Eureka 1999) and Eureka City Council’s Strategic Plan 2013-2018 (Lyle Sumek Associates, Inc. 2013).

The Phase A trail would generally consist of a paved section designed to accommodate emergency vehicle access and two unpaved shoulders. The following sections describe five segments of the project from north to south, the alignment of which is shown on Figure 2 (Appendix A). These segments are differentiated herein for clarity, but may or may not represent distinct segments during design or construction. Project-specific improvements such as elements of the multi-use trail, trailheads, parking, landscaping, street crossing(s), roadway/sidewalks, lighting, signage, and design standards are further described below under specific headings for Segments 1-5. Improved safety elements are integrated within the information below and would include improved trail surfaces (as deemed appropriate), American's with Disability Act (ADA) access, and signage.

The Phase A trail segment of the Eureka Waterfront Trail is a distinct project from any other trail sections to which it may connect under the proposed project or in the future, and it is a separate project from the overall California Coastal Trail system. The Eureka Waterfront Trail is not dependent on the success of other segments of trail and can be funded, implemented, and operated independently from other area trail segments.

Segment 1: Del Norte Street to Parcel 4

This section of trail would be constructed beginning at Del Norte Street adjacent to PALCO Marsh and extend south approximately 350 feet to a pedestrian footbridge that would cross the drainage ditch to the west, and then it will enter the NCRA ROW. From there, the trail would be constructed parallel to and on the inland (east) side of the existing NCRA railroad tracks (in compliance with the NCRA rail-with-trail guidelines), with the westerly edge of the trail located anywhere from 8.5–15-feet from the center of the tracks, consistent with NCRA specifications. The trail would consist of a 10-foot paved section and two 2-foot unpaved shoulders on each side. In those areas where there is wetland or environmentally sensitive habitat area (ESHA) impacts, the trail would narrow to 8-feet wide with two 2-foot unpaved shoulders.



Signage Historical and nature study interpretive signage.

Trail Amenities A cluster of outdoor gym equipment would be installed just east of the trail in the open area approximately 3,000 feet south of Del Norte Street, near Vigo Street. The footprint would be approximately 30 feet in diameter. There would also be two benches installed in viewing areas approximately 1,000 feet and 2,000 feet south of Del Norte Street.

Segment 2: Parcel 4

The trail section described above would be continued through Parcel 4. The trail would cross the railroad tracks on the existing unpaved road that provides entry into the north portion of Parcel 4 and continue to loop through Parcel 4 on the existing unpaved road, consistent with the Parcel 4 Feasibility Study (Redwood Community Action Agency no date), until it reconnects with the NCRA ROW approximately 200 feet north of the Chevron facility. This section of trail would be approximately 1,150 feet in length.



Signage Historical and nature study interpretive signage.

Segment 3: Parcel 4 to North Boundary of Chevron

The trail would continue south parallel to the NCRA railroad tracks, but would now be located on the west side of the tracks with the eastern edge of the trail located anywhere from 8.5–15 feet from the centerline of the tracks. This 250-foot long section of trail would be narrowed to an 8-foot paved section with two 2-foot unpaved shoulders to minimize impacts to adjacent wetlands and willows located on the west side of the tracks.



Segment 4: Chevron Terminal

This 450-lineal-foot trail section would start on the west side of the tracks from the northern edge of Chevron’s property until it connects with Chevron’s driveway. At the driveway, the trail would cross to the east side of the railroad tracks and then continue south towards Truesdale Street. Where the trail would cross the Chevron access driveway, the driveway/trail intersection would be designed to reduce conflicts between trail users and vehicles.



Signage Safety-related signage associated with crossing of driveway and street intersection.

Segment 5: Chevron Terminal to Truesdale Street

From the south Chevron property line, the trail would continue south within the railroad corridor on the east side of the tracks anywhere from 8.5–15 feet from the centerline of the tracks. A crossing would be designed at Truesdale Street to connect the trail with the sidewalk that leads to the Truesdale Vista Point parking lot and Hikshari' Trailhead, on the southwest corner of the Truesdale Street/Howell Street intersection.



Signage Safety-related signage associated with crossing of street intersection.

Trail Design

For portions that are within the NCRA ROW, the project will conform to NCRA Policy 0907 – Trail Projects on the NWP Line Rights-of-Way: Design, Construction, Safety, Operations, and Maintenance Guidelines (North Coast Railroad Authority 2009). This document outlines the NCRA’s policies regarding “Rails-with-Trails” projects and provides uniform and consistent standards on NCRA’s ROW for the design, construction, safety, operations, and maintenance of Rails-with-Trails projects. Setbacks from the railroad track required in this plan influenced the location and footprint of the proposed trail. The project has been designed to meet the operational needs of adjacent and intersecting roadways, the railway system, area businesses, and a variety of potential trail users.

The following General Design Characteristics would be used:

- Minimum Tread Width: 8 feet, but trail is primarily 10 feet wide
- Minimum shoulder width: 2 feet on each side of trail tread surface where space allows
- Minimum setback from edge of roadway to edge of tread: 5 feet (without a barrier)
- Minimum setback from edge of roadway to edge of tread: 2 feet (with barrier)
- Minimum setback from railroad track centerline to obstructions or edge of trail tread: 8.5 feet on tangent sections of tracks and 9.5 feet on curved sections of tracks
- Minimum setback from edge of tread to obstructions and buildings: 2 feet
- Minimum Vertical Clearance: 8 feet (10 feet if emergency vehicles use trail)
- Minimum Design Speed: 20 miles per hour
- Maximum Gradient: 5 percent
- Minimum Curve Radius: 90 feet
- Maximum Fence Height: 48 inches
- Minimum Fence Height: 36 inches
- Minimum Angle at which Trail can cross Railroad Tracks: 45 degrees
- ADA Accessibility: the trail would be ADA accessible

Additional project design specifications include:

- **Segments Adjacent to Roadways:** In compliance with Federal Highway Administration (FHWA) and Caltrans standards for a Class I Bikeway, segments of the trail adjacent to roadways would be separated by 5 feet and include a physical barrier (concrete barrier or fence).
- **Roadway and Driveway Crossings:** Would be ADA accessible and include warning signage and markings both on the trail and the approaching vehicular way.
- **Signage and Striping:** Trail would include yellow centerline striping and additional warning signage and striping approaching intersections with existing roads and railroad crossings. In addition, signage would be added along the trail warning users of curves, bends, and other hazardous situations.
- **Speed Control:** Speed control can only be maintained through signage and striping; speed bumps or other surface irregularities are not permitted to control the speed of bicycles and other non-motorized vehicles.

- **Bollards:** If determined necessary, bollards could be installed at trail intersections and entrances to prevent vehicles from entering a trail, with a maximum separation of 5-feet between bollards. Bollards could be located adjacent to the trail with a removable center bollard for emergency and maintenance access. Bollards would not be located in travel lanes. Bollards would be designed to be visible to bicyclists and others, especially at night time, with reflective materials and appropriate striping guiding bicyclists around the center bollards.
- **Intersection Crossings:** Intersections would be improved with continental-style crosswalks with striping and ADA accessible curb ramps. Trail approaches to intersections would include stop signs and stop bar (limit line) striping to stop trail users (particularly bicyclists) before they cross the intersection. In addition, at these locations, pedestrian crossing signage and “no motor vehicle” signage would be installed. Bollards could be installed at the mouths to the trail to inhibit vehicles from accessing the trail.
- **Drainage:** Design standards for the project require a 2 percent cross slope, except along cut sections where uphill water must be collected in a ditch and directed to a catch basin, in which case water would be directed under the trail in a drainage pipe of suitable dimensions.

Typical Examples:

The Rail with Trail standards includes a minimum setback from the railroad track centerline to obstructions or edge of trail tread of 8.5 feet on tangent sections of tracks and 9.5 feet on curved sections of track. The multi-use trail has a minimum tread width of 8 feet, but a 10-foot width will be applied wherever possible. A 2-foot shoulder width is required on each side of the trail tread and can include a planting strip or buffer. A project goal is for the entire trail to meet Class I trail standards. The trail will be parallel and adjacent to the sidewalk and roadway, as shown in Diagram 1.

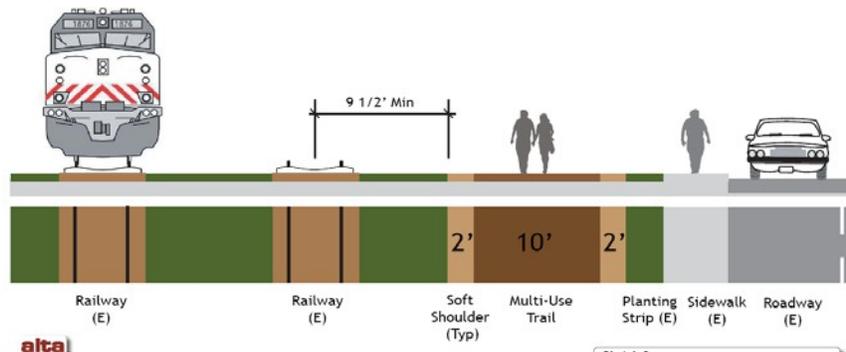


Diagram 1: Typical Proposed Eureka Waterfront Rail with Trail.

LEAD AGENCY/CONTACT: City of Eureka, Community Development Department, Lisa D. Shikany, Principal/Environmental Planner, 531 K Street Eureka, CA 95501 Phone: (707) 268-5265; Fax: (707) 441-4202 e-mail: lshikany@ci.eureka.ca.gov

SURROUNDING LAND USES AND SETTINGS: The city of Eureka is the westernmost city on the west coast of the United States and is located on the inner shoreline, buffered from the Pacific Ocean by the Samoa Peninsula and Humboldt Bay, the second largest bay in California. Eureka is approximately 275

miles north of San Francisco, 100 miles south of the Oregon border, and 216 miles northwest of Sacramento. As the county seat for 572-square-mile Humboldt County, Eureka is the center of business and government; the major industries include agriculture, fishing and tourism. The Eureka waterfront has long been the site of industrial development, much of which is now gone leaving only traces of its past as an area dominated by lumber mills, warehouses, and railroads. Within the project area and vicinity most buildings and other infrastructure have long since been removed or are no longer in use. Ruderal vegetation has taken over these areas and significant accumulations of garbage and other dumped debris have made much of the area between the Bayshore Mall (an important regional shopping center located a short distance east of the project area) and Humboldt Bay generally unappealing to the public. Transient and homeless encampments within the project area and vicinity add to concerns for public safety.

The project alignment lies within the state-designated Coastal Zone and within areas under the coastal permit jurisdiction of the California Coastal Commission and the City. The proposed trail corridor is largely within the NCRA ROW and is currently used as an unofficial pedestrian travel corridor. Industrial, commercial, and some residential development (the latter being near the south trail terminus at Truesdale Street), and other public recreational lands are immediately adjacent. The proposed project alignment leaves the NCRA ROW in two locations, where it runs along PALCO Marsh and when it enters an area known as “Parcel 4.” The 39-acre PALCO Marsh has a land use and zoning designation of Natural Resources pursuant to the City’s Local Coastal Program (LCP). The majority of remaining lands along Humboldt Bay, within or adjacent to the project alignment (including Parcel 4) have a land use and zoning designation of Coastal-Dependent Industrial or Community Commercial.

Biological resources, cultural resources, visual resources, and public access within the Coastal Zone are protected by the California Coastal Act of 1976 and the City’s LCP. The City’s Parks and Recreation Department will be seeking a consolidated permit from the California Coastal Commission under the Coastal Act. The Coastal Commission will provide the standard for review for the Coastal Development Permit. A conditional use permit (CUP) will be required for the trail as it encroaches upon lands zoned as Coastal-Dependent Industrial and Natural Resources. As part of the CUP approval, the project must be found to be consistent with the City’s LCP.

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS, OR MAY BE REQUIRED (e.g. permits, financing approval, or participation agreement.):

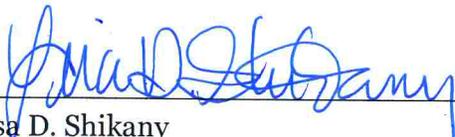
- U.S. Army Corps of Engineers
- California Coastal Commission
- North Coast Regional Water Quality Control Board
- North Coast Unified Air Quality Management District
- California Department of Fish and Wildlife
- California Department of Transportation – District 1
- California Public Utilities Commission
- North Coast Railroad Authority
- Humboldt Bay Harbor, Recreation and Conservation District

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" (before any proposed mitigation measures have been adopted) as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Green House Gas Emissions | <input checked="" type="checkbox"/> Hazards/Hazardous Materials | <input checked="" type="checkbox"/> Hydrology/Water Quality |
| <input checked="" type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems | |
| <input checked="" type="checkbox"/> Mandatory Findings of Significance | | |

DETERMINATION: 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 those 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.



Lisa D. Shikany
Principal/Environmental Planner, City of Eureka

9-8-14

Date

CHECKLIST AND EVALUATION OF ENVIRONMENTAL IMPACTS: An explanation for all checklist responses is included, and 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 less than significant. In the checklist below the following definitions are used:

- **"Potentially Significant Impact"** means there is substantial evidence that an effect may be significant.
- **"Less than Significant With 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 proposed project, or clearly will not impact nor be impacted by the project.

Introduction and Regulatory Guidance

This document is an Initial Study (IS) that summarizes the technical studies prepared for the proposed Eureka Waterfront Trail Project – Phase A (project). It includes an evaluation of potential environmental impacts that could result from the project and provides justification for a Mitigated Negative Declaration (MND) for the project. This document has been prepared in accordance with the current California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the State CEQA Guidelines. Mitigation measures have been proposed to avoid or minimize any significant impacts that were identified.

Lead Agency

The Lead Agency is the public agency with primary responsibility for implementing a project. The project would receive funding through federal and state sources and would require approvals from the Federal Highway Administration (FHWA) and the California Department of Transportation (Caltrans). FHWA has designated Caltrans to act as the National Environmental Policy Act (NEPA) Lead Agency on its behalf. The City is the CEQA Lead Agency. NEPA approval is anticipated to be in the form of a Categorical Exclusion supported by technical studies.

Supporting Technical Studies

The technical studies listed below are available for review at the City. Please contact:

Miles Slattery, Parks and Recreation Director
City of Eureka Parks and Recreation Department
1011 Waterfront Drive
Eureka, CA 95501
Phone: (707) 441-4184

Technical studies conducted for this project include:

- Archeological Survey Report (ASR)/Historical Properties Survey Report (HPSR)/Environmentally Sensitive Area (ESA) Action Plan (confidential; available to qualified readers only)
- Historic Resources Evaluation Report (HRER)
- Natural Environment Study (NES) Report
- Wetland Delineation Reports for Phase A and Phase B
- Phase I Environmental Site Assessment Reports for Phase A and Phase B
- Visual Impact Assessment (VIA) Report

| I. AESTHETICS. 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? | | | ✓ | |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? | | | | ✓ |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | | | ✓ | |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? | | ✓ | | |

THRESHOLDS OF SIGNIFICANCE: This Initial Study considers whether the proposed project may have any significant effects on visual aesthetics because of: (a) the short-term or long-term presence of project-related equipment or structures; (b) project-related changes in the visual character of the project area that may be perceived by residents or visitors as a detraction from the visual character of the project area; (c) permanent changes in physical features that would result in the effective elimination of key elements of the visual character of the project area near a State scenic highway; or (d) the presence of short-term, long-term, or continuous bright light, such as from welding or nighttime construction, that would detract from a project area that is otherwise generally dark at night or that is subject to artificial light.

DISCUSSION: Specific to scenic vistas and scenic resources, the principle purpose of the proposed project is to provide self-guided access to Humboldt Bay and its viewsheds by utilizing a dedicated trail and existing day use areas. The project area is in the coastal zone, and therefore subject to applicable coastal scenic resource protection measures (California Coastal Act and City of Eureka LCP). The vistas in the area of the proposed trail include views of Humboldt Bay and PALCO Marsh, as well as existing Eureka waterfront development comprised of recreational and industrial uses. Some areas of the proposed trail alignment include views of Samoa Peninsula.

The proposed Phase A trail alignment is largely characterized by a lack of paved roads and absence of existing development. The landscape type is coastal with a mix of wetlands, passive recreation trails, and traces of past industrial land uses. A gravel trail and a closed gravel road/NCRA railroad corridor begin on the south side of Del Norte Street and continue south along the NCRA tracks to Parcel 4 where the proposed trail would temporarily leave the railroad corridor and follow an existing gravel road through the historic PALCO site before rejoining the railroad track alignment and continuing south past the Chevron Terminal. Parts of the northern segment of the proposed Phase A trail alignment would come close to the shoreline (less than 100 feet), thus allowing for expansive views of Humboldt Bay to the west and PALCO Marsh to the east. Topography and dense ruderal vegetation

obscure most other long distance views to the east and west from within the proposed trail alignment. Segments of the proposed trail near the shoreline may be visible from Samoa Peninsula, but most other views of the trail from outside of the proposed alignment are obstructed by a dense stringer of tall vegetation that extends along most of the back of the mall parking lot. Relatively flat topography contributes to the lack of west-facing views from the mall.

Implementation of the project would not block or alter any of these existing views. Signs associated with the project would be consistent with the existing signage in the project area. The alignment itself falls entirely within previously disturbed areas including streets, railroad tracks, and industrial yards.

I a) Less-than-Significant Impact. The project would have a less-than-significant impact on existing or planned scenic views of Humboldt Bay and vicinity. The proposed trail alignment through Parcel 4 would open a visual resource to the community that is unique to the Eureka coastline. There would be no changes to the waterfront as a result of project implementation or to the Truesdale Vista Point located near the southern terminus of the Phase A alignment. There would be no significant vegetation removal or addition of trail amenities associated with the Phase A trail alignment with the exception of a cluster of outdoor gym equipment and benches proposed on the east side of the trail near Vigo Street. Locating the benches and outdoor equipment on the east side of the proposed alignment would avoid impacting views from the trail of Humboldt Bay to the west. Existing (undesignated) vistas would not be significantly affected by the project as the proposed trail would consist of a narrow paved pathway and signage that is consistent with the current uses in the area.

I b) No Impact. The project does not include removal or alterations to any existing scenic resources, including trees, rock outcroppings, or historic buildings within sight of a state scenic highway; therefore, there would be no impact.

I c) Less-than-Significant Impact. The project is expected to improve aesthetics, overall visual quality, and enhance opportunities for the public to experience the scenic vistas of Humboldt Bay and the Eureka waterfront. Although there would be no significant changes to the visual character of the existing road and trail corridors that would become a part of the proposed trail, it is anticipated that the qualities of intactness and unity of the visual resources experienced from the trail would increase through project implementation and operation. Historical and nature study interpretive signage alerting trail users to points of interest along the route that might otherwise go unnoticed could enhance the visual experience of trail users.

Temporary adverse visual impacts may occur from construction disturbance. This may slightly detract from visitor experience on a temporary basis although long-term aesthetics throughout the corridor would improve with project implementation. Clean-up of debris and garbage currently found within the project area, and the orderliness that the proposed trail would bring to the area, would improve the visual character and the quality of views associated with the Phase A trail.

I d) Less than Significant with Mitigation Incorporated. The completed project includes use of nighttime safety lighting at locations where the trail would intersect roadways and railroads tracks (i.e., north and south termini). While this would be a new source of nighttime lighting, low-level, low-glare lighting would be used. The potential for glare from headlights (including bicycle lights), the expanded trail surface, and soils exposed by project construction and vegetation removal would be consistent with existing conditions and not substantial. Nighttime views of the project area would be limited to artificial light sources at two existing trailheads at Del Norte and Truesdale, which may be

visible for a distance from outside of the project area. *Mitigation Measure AES-1 – Light and Glare* requires that permanent lighting be designed to protect wildlife and nighttime views using various types of fixtures in combination with performance standards, thereby ensuring that impacts resulting from these new sources of light will be less than significant.

FINDINGS: Therefore, based on the discussion above, the project will not result in significant adverse aesthetic impacts. The project is expected to improve aesthetics and visitor access to scenic vistas in the project area.

MITIGATION MEASURES

Mitigation Measure AES-1 – Light and Glare: To avoid adverse impacts, new sources of light will be designed to protect wildlife and nighttime views, including views of the night sky. This design goal will be satisfied using a variety of means as applicable, including fixture types, cut off angles, shields, lamp arm extensions, and pole heights. Specific design preferences include not directing light upward or to other properties; avoiding brightly illuminated vertical surfaces where feasible, such as walls and lamp poles; and not directing lighting toward environmentally sensitive habitats. The current Recommended Practices and American National Standards Institute of the Illuminating Engineering Society of North America should be consulted for lighting levels and quality of light.

- Timing/Implementation:** Prior to and during construction
- Enforcement:** City Parks & Recreation Department
- Monitoring:** City and/or its contractor
- Evidence of Compliance:** Completion of and adherence to required documents.

| | | | | |
|---|--------------------------------|--|------------------------------|-----------|
| <p>II. AGRICULTURE RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p> | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| <p>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?</p> | | | | ✓ |
| <p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p> | | | | ✓ |
| <p>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production as defined by Government Code Section 51104(g))?</p> | | | | ✓ |
| <p>d) Result in loss of forest land or conversion of forest land to non-forest use?</p> | | | | ✓ |

| | | | | |
|--|--|--|--|---|
| <p>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 forest land to non-forest use?</p> | | | | ✓ |
| <p><u>THRESHOLDS OF SIGNIFICANCE:</u> This Initial Study considers to what degree the proposed project would: (a) change the availability or use of agriculturally important land areas designated under one or more of the programs above; (b) cause or promote changes in land use regulation that would adversely affect agricultural activities in lands zoned for those uses, particularly lands designated as Agriculture Exclusive or under Williamson Act contracts; (c) change the availability or use of agriculturally important land areas for agricultural purposes; (d) loss of conversion of forest land; and (e) cause other changes to the environment that would result in a conversion of farmland or forest land.</p> <p><u>DISCUSSION</u></p> <p>II a and b) No Impact. The project area and vicinity supports a mix of commercial, industrial, residential, and natural resources uses and does not contain lands that have been mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation 2008). There are no lands in the project area currently used for agricultural and none that are under a Williamson Act contract (California Department of Conservation 2014a).</p> <p>II c and d) No Impact. The project are does not include any forestland and would not cause rezoning of forestland, timberland, or timberland zoned timber production.</p> <p>II e) No Impact. There are no agricultural or forest lands in the project vicinity. Construction and operation of the project would have no impact on any farmlands or timberlands in the Eureka area.</p> <p><u>FINDINGS:</u> Therefore, as discussed above, the project would have no impact on farmlands, agricultural lands, or forest lands.</p> <p><u>MITIGATION MEASURES</u></p> <p>No project-specific mitigation is required under this subject.</p> | | | | |

| III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management 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? | | ✓ | | |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | | ✓ | | |
| c) 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 (including releasing emissions, which exceed quantitative thresholds for ozone precursors)? | | | ✓ | |
| d) Expose sensitive receptors to substantial pollutant concentrations? | | | ✓ | |
| e) Create objectionable odors affecting a substantial number of people? | | | ✓ | |
| <p><u>THRESHOLDS OF SIGNIFICANCE:</u> This Initial Study considers to what degree the proposed project would (a) directly interfere with the attainment of long-term air quality objectives identified by the North Coast Unified Air Quality Management District (NCUAQMD); (b) contribute pollutants that would violate an existing air quality standard, or contribute to a non-attainment of air quality objectives in the project’s air basin; (c) produce pollutants that would contribute as part of a cumulative effect to non-attainment for any priority pollutant; (d) produce pollutant loading near identified sensitive receptors that would cause locally significant air quality impacts; or (e) release odors that would affect a number of receptors.</p> | | | | |
| <p><u>DISCUSSION</u></p> <p>The project study area is located within the North Coast Air Basin (NCAB) and is under the jurisdiction of the NCUAQMD. The NCUAQMD establishes policies, regulations, and permit procedures for Humboldt, Del Norte, and Trinity counties. Air quality in the NCAB is influenced by a number of factors, including stationary sources such as residential wood heating, non-stationary sources such as motor vehicle exhaust, forest management (prescribed fire), and the meteorology of a given area.</p> | | | | |

The NCAB is currently in attainment (or is unclassified) of all State and Federal ambient air quality standards, with the exception of the State standard for particulate matter less than ten micrometers in diameter (PM₁₀). PM-10 air emissions include chemical emissions and other inhalable particulate matter with an aerodynamic diameter of less than 10 microns. The greatest sources of PM₁₀ are human-caused area-wide sources, such as motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, and agriculture, wildfires and brush/waste burning, industrial sources, and windblown dust from open lands, airborne salts and other particulate matter naturally generated by ocean surf (California Air Resources Board 2013). With regard to PM-10 air emissions, all of Humboldt County has been designated by the California State Air Quality Board as being in “non-attainment.” Moreover, nearly all areas of the State are classified as non-attainment for PM₁₀ (Air Resources Board 2010b). Humboldt County exceeds the State standard for PM-10 air emissions partially due to a large number of wood stoves, generally heavy surf, and high winds common to this area.

III a, b) Less than Significant with Mitigation Incorporated. Construction activities associated with the project would result in a relatively minor net increase in PM₁₀. While the amount of PM₁₀ generated by the project would be minor, it would nevertheless be considered a significant impact because of the NCUAQMD’s current non-attainment status for particulate matter. In addition to adhering to the current Caltrans Standard Specifications and North Coast Unified AQMD’s PM₁₀ Attainment Plan draft report (North Coast Unified Air Quality Management District 1995) for air quality, implementation of *Mitigation Measure AIR-1 – Fugitive Dust* will be used to reduce this impact to a less-than-significant level by requiring the preparation and implementation of a dust and emissions control program that will reduce PM₁₀ emissions below a threshold of significance.

III c) Less-than-Significant Impact. As previously discussed, the NCAB is in non-attainment for PM₁₀ under the State criteria. The project would generate some particulate matter during construction as a result of fugitive dust and exhaust emissions; however, because the minor amounts of particulate matter generated by project construction would be mitigated to a less-than-significant level using *Mitigation Measure AIR-1 – Fugitive Dust (as described above in III a, b)* the impact would not be cumulatively considerable. The proposed project would not obstruct implementation of the NCUAQMD Particulate Matter Attainment Plan, violate air quality standards, or contribute substantially to an existing or projected air quality violation.

Operation of the project would not directly contribute any air emissions upon completion of construction since the trail would be for non-motorized and pedestrian uses only. The proposed project would provide a multi-use, ADA-accessible trail that may have the benefit of reducing motor vehicle trips through the city in favor of trail use. The project may result in a minor increase in the number of cars using nearby roads to access trail parking areas, but considering that any increase in motor vehicles trips is likely to cause a corresponding increase in non-motorized activity on the trail, PM₁₀ emissions related to project operation would be less than significant.

III d) Less-than-Significant Impact. The proposed project is not located directly adjacent to a sensitive receptor (e.g. hospitals, daycare centers, schools, etc.), with the exception of residential development at the extreme southern end of the alignment near Truesdale Street. The volume of air pollutants generated by construction of the project would be minor and consistent with existing conditions associated with nearby roads and industrial land uses. Construction would meet all applicable local, State and Federal standards for building construction, debris disposal and pollutant control. The potential exposure of sensitive receptors to air pollutants during project construction

would be less than significant. Operation of the proposed project would have no impact on sensitive receptors.

III e) Less-than-Significant Impact. The project would not create odors that could reasonably be considered objectionable by the general public. The project is, however, within an area of existing commercial and industrial activity that may expose trail users to objectionable odors. In addition, during times of low tide, the Bay may produce objectionable odors. However, the project area is already predominantly accessible to the public and users of the proposed trail would be able to use the trail to move beyond areas that may produce objectionable odors at any given time. Therefore, impacts would be less than significant.

FINDINGS: Based on the conclusions above and the mitigation measure listed below, the project will not result in any significant adverse air quality impacts or result in a cumulatively considerable increase in PM10 emissions. Therefore, impacts would be less than significant.

MITIGATION MEASURES

Mitigation Measure AIR-1- Fugitive Dust: The City shall include provisions in the construction bid documents that the contractor shall implement a dust control program to limit fugitive dust and vehicle emissions. The dust and emissions control program shall include, but not be limited to, the following elements, as appropriate:

- Water inactive construction sites and exposed stockpile sites at least twice daily, including during non-work days or until soils are stable.
- All earthmoving activities shall cease when sustained winds exceed 15 miles per hour.
- Pursuant to the California Vehicle Code, all trucks hauling soil and other loose material to and from the construction site shall be covered or shall maintain at least 6 inches of freeboard (i.e., minimum vertical distance between top of load and the trailer).
- Earth or other material that has been transported by trucking or earth moving equipment, erosion by water, or other means onto paved streets shall be promptly removed.
- Any topsoil that is removed during construction shall be stored onsite in piles not to exceed 4 feet in height to allow development of microorganisms prior to resoiling of the construction area. These topsoil piles shall be clearly marked and flagged. Topsoil piles that will not be immediately returned to use shall be revegetated with a non-persistent erosion control mixture.
- Soil piles for backfill shall be marked and flagged separately from native topsoil stockpiles. These soil piles shall also be surrounded by silt fencing, straw wattles, or other sediment barriers or covered unless they are to be immediately used.
- Equipment or manual watering shall be conducted on all stockpiles, dirt/gravel roads, and exposed or disturbed soil surfaces, as necessary, to reduce airborne dust.

- Construction vehicles shall minimize idling time and equipment shall be shut off when not in use pursuant to California Code of Regulations (Title 13, Division 3, Chapter 10 §2485).
- Construction equipment will be maintained in proper working conditions according to manufacturer's specifications. Equipment must be checked daily and determined to be in proper running condition before it is operated.
- The contractor shall keep a daily log of activities to control fugitive dust.

Timing/Implementation: During construction

Enforcement: City Parks & Recreation Department, North Coast AQMD

Monitoring: City and/or its contractor

Evidence of Compliance: Adherence to requirements.

| 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 Game or U.S. Fish and Wildlife Service? | | ✓ | | |
| 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 Game or U.S. Fish and Wildlife Service? | | ✓ | | |
| c) Have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | | ✓ | | |
| 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? | | | ✓ | |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | | | ✓ | |
| 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? | | | ✓ | |
| <p>THRESHOLDS OF SIGNIFICANCE: This Initial Study considers whether the proposed project would result in a significant adverse direct or indirect effects to: (a) individuals of any plant or animal species (including fish) listed as rare, threatened, or endangered by the Federal or State government, or effects to the habitat of such species; (b) more than an incidental and minor area of riparian habitat</p> | | | | |

or other sensitive habitat (including wetlands) types identified under Federal, State, or local policies; (c) more than an incidental and minor area of wetland identified under Federal or State criteria; (d) key habitat areas that provide for continuity of movement for resident or migratory fish or wildlife, (e) other biological resources identified in planning policies adopted by the City of Eureka, or (f) conflict with an adopted conservation plan.

DISCUSSION

The following responses are based on the *Natural Environment Study (NES), Eureka Waterfront Trail Project Phase A and B* (North State Resources 2014).

The project study area is surrounded by and includes several developed areas that lend a highly disturbed characteristic to an ecological landscape fragmented by urban influence. Increased human access due to this adjacent development has resulted in degradation to native biological communities. Causes of degradation include, but are not limited to, transient activity, dumping, and the invasion of exotic plants. Nevertheless, biological communities in the project area include several generally intact native plant communities and wetland systems including the PALCO Marsh complex.

Vegetation communities mapped within the project study area are based partly on habitat descriptions provided in *A Guide to Wildlife Habitats of California* (Mayer and Laudenslayer 1988). The vegetation communities within 100-feet of the project study area include barren, riparian scrub, ruderal, and urban; and aquatic habitats that were classified based on the Cowardin classification system (Cowardin et al. 1979; Mitsch and Gosselink 2000): estuarine emergent wetland, estuarine unconsolidated bottom, and palustrine emergent wetland. Figure 3 (Appendix A) shows the vegetation communities within the project's biological study area. All vegetation communities included in this report are described below beginning with the aquatic habitats.

Estuarine Emergent Wetlands: Estuarine refers to tidal, brackish water wetlands. Estuarine emergent wetlands are associated with deepwater tidal channels and adjacent tidal wetlands. These areas are usually partly obstructed by land but have open, partly obstructed, or occasional access to the ocean. In addition, these areas receive at least occasional freshwater runoff that dilutes the otherwise saline conditions. Irregularly flooded areas receive tidal inundation on a less-than-daily basis, whereas regularly flooded areas are tidally flooded and alternately exposed at least once daily. Both within and adjacent to the Phase A project study area, estuarine emergent wetland includes predominately salt marsh that is west of the NRCA rail corridor. Dominant plants include salt grass (*Distichlis spicata*), pickleweed (*Salicornia virginiana*), and dense-flowered cord grass (*Spartina densiflora*). In Parcel 4, the estuarine emergent wetlands west of the proposed trail are intermixed with riparian scrub vegetation (i.e., willows, red alder, and wax myrtle).

Estuarine Unconsolidated Bottom: Estuarine refers to tidal, brackish water wetlands. Unconsolidated bottoms are characterized by the lack of large stable surfaces for plant and animal attachment. Exposure to wave and current action, temperature, salinity, and light penetration determines the composition and distribution of organisms. In the Phase A project study area, estuarine unconsolidated bottom includes a tidal slough, that is immediately south of Del Norte Street, and a portion of Humboldt Bay at the mouth of the tidal slough. Eel grass (*Zostera marina*) has been documented to occur within this tidal slough in previous studies, and the City is currently monitoring

the eel grass in the lower tidal slough as part of their permit requirements for the PACLO Marsh Phase 1A culvert installation.

Palustrine Emergent Wetlands: Palustrine refers to non-tidal freshwater wetlands, and wetlands occurring in tidal areas with salinity from ocean-derived salts of less than 0.5 parts per thousand (Cowardin et al. 1979; Mitsch and Gosselink 2000). Palustrine emergent wetlands are usually characterized by the presence of erect, rooted, herbaceous hydrophytes (plants typically found in water or in a substrate that is at least periodically deficient in oxygen due to excessive water content). In the project area, these wetland types are persistent (support perennial vegetation that remains standing until at least the beginning of the next growing season), and likely remain saturated and/or inundated for long to very long periods during the growing season. Palustrine emergent wetland is abundant in the Phase A project study area and vicinity, and is represented by PALCO Marsh and the adjacent smaller marshes and ditches. This community has several dominant plants in common with estuarine emergent wetland including saltgrass, pickleweed, and seaside arrow-grass. Other common plants in the palustrine emergent wetlands in the project study area and vicinity include cattail (*Typha latifolia*), common rush (*Juncus effusus*), common reed (*Phragmites australis*), pennyroyal (*Mentha pulegium*) and slough sedge (*Carex obnupta*).

Barren: Barren habitat occurs includes roadways, sidewalks, residential areas, and commercial areas. The barren portions of the study area are denuded of vegetation, although sparse opportunistic grasses and forbs or weedy species may occur.

Riparian Scrub: The riparian scrub community within the Phase A project study area consists primarily of areas dominated by willows (*Salix* sp.), red alders (*Alnus rubra*), and Pacific wax myrtle (*Myrica californica*). Patches of coyote brush (*Baccharis pilularis*) west of the old railroad line are included in this vegetation community, as are areas dominated by brambles (*Rubus ursinus*, *R. armeniacus*). Much of the riparian scrub is adjacent to freshwater wetlands that are not truly “riparian” from a strict wetland definition (i.e., near a flowing channel or large body of water), but rather are best characterized by this structural habitat type. Within the project study area, this community includes forested areas on Parcel 4, and the willow/alder corridor between the old railroad line and the Bayshore Mall, which was planted by the mall as partial mitigation for impacts to wetlands resulting from mall construction.

Ruderal: Ruderal vegetation is characterized by weedy non-native, herbaceous species that tend to favor disturbance. Representative grasses and forbs in the project study area include sweet vernal grass (*Anthoxanthum odoratum*), ripgut brome (*Bromus diandrus*), rattail fescue (*Festuca myuros*), fennel (*Foeniculum vulgare*), burclover (*Medicago polymorpha*), yellow parentucellia (*Parentucellia viscosa*), and plantain (*Plantago* sp.). Ruderal vegetation occurs throughout the project study area and includes nearly all of the NCRA corridor, roadsides, former industrial areas, and other areas altered by human disturbance.

Urban: Urban vegetation community is the landscaped area consisting of introduced species and/or native species associated with human development(s). Species composition varies with planting design and climate. Landscape planting habitats are not limited to any particular physical setting.

Environmentally Sensitive Habitat Areas (ESHA): The Coastal Act Section 30107.5 defines “environmentally sensitive area” as any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be

easily disturbed or degraded by human activities and developments. Generally, the Coastal Commission considers wetland to be ESHA.

The City's Local Coastal Program specifically, General Plan/Coastal Land Use Plan Policy 6.A.6 and Zoning Ordinance section (10-5.2942.3 (156.052(c)) specifically defines ESHA, which includes wetlands, within the City:

The City declares the following to be environmentally sensitive habitat areas within the Coastal Zone:

- a. Rivers, creeks, sloughs, gulches and associated riparian habitats, including Eureka Slough, Fay Slough, Cut-Off Slough, Freshwater Slough, Cooper Slough, Second Sloughs, Third Slough, and Elk River.
- b. Wetlands and estuaries, including that portion of Humboldt Bay within the city's jurisdiction, riparian areas, and vegetated dunes.
- c. Indian Island, Daby Island, and Woodley Island wildlife area.
- d. Other habitat areas, such as rookeries, and rare or endangered species on state or federal lists.
- e. Grazed or farmed wetlands.

Regional Hydrology: Humboldt Bay drains four main sub-watersheds (Jacoby Creek, Freshwater Creek, Elk River, and Salmon Creek) which support native wild populations of salmon and steelhead. Streams in the watershed are used by salmon and steelhead (salmonids) for spawning and rearing.

IVa) Less than Significant with Mitigation Incorporated. The NES report (North State Resources 2014), which analyzes the project effects on biological resources, identified the following special status plant, wildlife, and fish species as having the potential to be impacted as a result of project construction and/or operation:

Plants

- Lyngbye's sedge (*Carex lyngbyei*) – California Native Plant Society (CNPS) Rare Plant Rank (RPR) 2B.2¹
- Point Reyes bird's-beak (*Chloropyron maritimum* ssp. *palustre*) – RPR 1B.2¹
- Humboldt Bay owl's-clover (*Castilleja ambigua* var. *humboldtiensis*) – RPR 1B.2¹
- Dwarf alkali grass (*Puccinellia pumila*) – RPR 2B.2¹
- Western sand-spurrey (*Spergularia canadensis* var. *occidentalis*) – RPR 2B.1¹

¹ California Native Plant Society Rare Plant Rank (RPR) Codes and Extensions:

| | |
|------|--|
| 1B | Plants rare, threatened, or endangered in California and elsewhere. |
| 2B | Plants rare, threatened, or endangered in California, but more common elsewhere. |
| xx.2 | Moderately threatened in California |
| xx.1 | Seriously threatened in California |

Fish

- Green sturgeon Southern Distinct Population Segment (DPS) (*Acipenser medirostris*) – Federally Threatened; State Species of Special Concern
- Southern Oregon/Northern California Coasts (SONCC) Evolutionarily Significant Unit (ESU) coho salmon (*Oncorhynchus kisutch*) – Federally Threatened and Critical Habitat; State Threatened and Critical Habitat/Essential Fish Habitat
- Northern California DPS steelhead (*O. mykiss*) – Federally Threatened and Critical Habitat
- California Coastal ESU Chinook salmon (*O. tshawytscha*) – Federally Threatened and Critical Habitat
- Longfin smelt (*Spirinchus thaleichthys*) – Federal Candidate; State Threatened and Species of Special Concern
- Southern eulachon DPS (*Thaleichthys pacificus*) - Federal Threatened; State Species of Special Concern
- Tidewater goby (*Eucyclogobius newberryi*) – Federal Endangered; State Species of Special Concern
- Green sturgeon Northern DPS (*A. medirostris*) – State Species of Special Concern
- Coastal cutthroat trout (*O. clarkii clarkii*) – State Species of Special Concern

Amphibians

- Northern red-legged frog (*Rana aurora*) – State Species of Special Concern

Birds

- Brown pelican (*Pelecanus occidentalis californicus*) – State Fully Protected
- Northern harrier (*Circus cyaneus*) – State Species of Special Concern
- White-tailed kite (*Elanus leucurus*) – State Fully Protected
- Short-eared owl (*Asio flammeus*) – State Species of Special Concern
- Bald eagle (*Haliaeetus leucocephalus*) – State Endangered and Fully Protected
- Peregrine falcon (*Falco peregrinus anatum*) – State Species of Special Concern and Fully Protected
- Vaux’s swift (*Chaetura vauxi*) – State Species of Special Concern
- Purple martin (*Progne subis*) – State Species of Special Concern

- Loggerhead shrike (*Lanius ludovicianus*) – State Species of Special Concern
- Little willow flycatcher (*Empidonax traillii brewsteri*) – State Endangered
- Yellow-breasted chat (*Icteria virens*) – State Species of Special Concern
- Yellow warbler (*Dendroica petechia brewsteri*) – State Species of Special Concern

Mammals

- Pallid bat (*Antrozous pallidus*) – State Species of Special Concern
- Townsend’s big-eared bat (*Corynorhinus townsendii*) – State Species of Special Concern

Special Status Plants

In 2003, Point Reyes bird’s-beak was observed outside of, but within 100 feet of, the proposed trail alignment near the northwest corner of PALCO Marsh and Del Norte Street (SHN 2003). Additional occurrences of this plant were found in tidal salt marsh habitat west of the railroad tracks.

A 2002 botanical survey (Mad River Biologists 2002) found Humboldt Bay owl’s-clover in tidal salt marsh habitat just outside of the proposed trail alignment, west of the railroad tracks. An additional large population (approximately 2000 plants) of Humboldt Bay owl’s-clover was observed during NSR’s 2014 survey (North State Resources 2014) on the salt marsh at the west edge of Parcel 4 approximately 250 west of the proposed trail alignment.

Lyngbye’s sedge was observed in Parcel 4 (outside of the proposed project area) in 2003 (SHN 2003) and found to still be present during NSR’s survey (North State Resources 2014).

Based on the habitat requirements for dwarf alkali grass and western sand-spurrey, there is potential for these species to occur; however, neither species was detected during any of the botanical surveys conducted in the proposed project area or vicinity.

Development of the proposed trail could indirectly affect Lyngbye’s sedge, Point Reyes bird’s-beak, Humboldt Bay owl’s clover, dwarf alkali grass and western sand-spurrey. Potential indirect effects include disturbance or mortality of individuals as a result of construction activities. Construction activities typically include the refueling of construction equipment on location. As a result, minor fuel and oil spills could occur. In addition, adjacent ground disturbance could result in indirect impacts due to sediment mobilization. Project operation, including the increased presence of pedestrian traffic through the project area is not anticipated to adversely impact special-status plant species since the proposed trail alignment would follow existing roads and trails. *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants*, which includes the preparation and implementation of site-specific spill prevention plan, as well the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) as part the Clean Water Act Section 402 permit, will protect special-status plant populations from exposure to contaminants as part of accidental spills and sediment mobilization. Further, *Mitigation Measure BIO-2 – Special-Status Plants* includes a new targeted protocol plant survey that will ensure that any sensitive plant populations within the study area will be mapped and excluded via fencing. If a population cannot be avoided, the City will consult CDFW to determine appropriate salvage and relocation measures. Implementation of all of these

measures shall ensure that any project-related impacts on special-status plant species will be less than significant.

Fish

Green Sturgeon Southern DPS. Green sturgeon southern DPS do not spawn in the project area. The species do not occur in or north of the Eel River. NMFS designated critical habitat for this species on October 9, 2009 (74 FR 52300), and Humboldt Bay is included as a designated estuarine area; however, the proposed project area is located outside of, but adjacent to, designated critical habitat for the species. The proposed project would not require any in-water construction activity. Project construction would have no direct impacts on green sturgeon or its habitat in Humboldt Bay. There is no planned use of herbicides associated with the proposed project. Indirect impacts to this species could occur as a result of the accidental spill of pollutants or the temporary mobilization of sediment as a result of construction activities. Implementation of *Mitigation Measure BIO-1 -- Prevention of Accidental Spills of Pollutants* and *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* will reduce the potential for indirect impacts to this species due to accidental spills of pollutants and the occurrence of erosion and sedimentation during construction to a less-than-significant level by developing and implementing a site-specific pollution prevention plan and SWPPP. There would be no impact on green sturgeon southern DPS or its habitat as a result of project operation.

Southern Oregon/Northern California Coasts Coho Salmon ESU. Suitable spawning habitat for coho salmon is not present in the proposed project area. However, salmonids use the estuarine environment of Humboldt Bay at least once when migrating to the ocean as juveniles and at least once when returning to spawn. Eelgrass beds in the proposed project area provide potential refuge and forging habitat for juvenile salmonids, and recent PALCO Marsh restoration activities have enhanced the connection between the marsh and the bay through actions such as culvert replacement, new channel construction, and tidal slough dredging. Coho salmon may move through the project area in the tidal channels leading to and from PALCO Marsh, which may serve as rearing habitat. Project construction would have no direct impacts on coho salmon or its habitat in Humboldt Bay or PALCO Marsh. There is no planned use of herbicides associated with the proposed project. Indirect impacts to this species could occur as a result of the accidental spill of pollutants or the temporary mobilization of sediment as a result of construction activities. Implementation of *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants* and *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* will reduce the potential for indirect impacts to this species due to accidental spills of pollutants and the occurrence of erosion and sedimentation during construction to a less-than-significant level by developing and implementing a site-specific pollution prevention plan and SWPPP. There would be no impact on Southern Oregon/Northern California Coasts coho salmon ESU or its habitat as a result of project operation.

Northern California Steelhead DPS. Suitable spawning habitat for the Northern California steelhead DPS is not present in the proposed project area. However, salmonids use the estuarine environment of Humboldt Bay at least once when migrating to the ocean as juveniles and at least once when returning to spawn. Eelgrass beds in the proposed project area provide potential refuge and forging habitat for juvenile salmonids and recent PALCO Marsh restoration activities have enhanced the connection between the marsh and the bay through actions such as culvert replacement, marsh channel clearing and construction, and tidal slough dredging. Steelhead may move through the project site in the tidal channels leading to and from PALCO Marsh, which may serve as rearing habitat. Project construction would have no direct impacts on steelhead or its habitat in Humboldt Bay and

PALCO Marsh. There is no planned use of herbicides associated with the proposed project. Indirect impacts to this species could occur as a result of the accidental spill of pollutants or the temporary mobilization of sediment as a result of construction activities. Implementation of *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants* and *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* will reduce the potential for indirect impacts to this species due to accidental spills of pollutants and the occurrence of erosion and sedimentation during construction to a less-than-significant level by developing and implementing a site-specific pollution prevention plan and SWPPP. There would be no impact on Northern California steelhead DPS or its habitat as a result of project operation.

California Coastal Chinook Salmon ESU. Chinook spawn in upstream reaches of larger streams tributary to Humboldt Bay and young fish are believed to rear in the estuary. Eelgrass beds in the proposed project area provide potential refuge and forging habitat for juvenile salmonids and recent PALCO Marsh restoration activities have enhanced the connection between the marsh and the bay through actions such as culvert replacement, new channel construction, and tidal slough dredging. Steelhead may move through the project site in the tidal channels leading to and from PALCO Marsh, which may serve as rearing habitat. Project construction would have no direct impacts on Chinook salmon or its habitat in Humboldt Bay or PALCO Marsh. There is no planned use of herbicides associated with the proposed project. Indirect impacts to this species could occur as a result of the accidental spill of pollutants or the temporary mobilization of sediment as a result of construction activities. Implementation of *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants* and *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* will reduce the potential for indirect impacts to this species due to accidental spills of pollutants and the occurrence of erosion and sedimentation during construction to a less-than-significant level by developing and implementing a site-specific pollution prevention plan and SWPPP. There would be no impact on California Coastal Chinook salmon ESU or its habitat as a result of project operation.

Longfin Smelt. Historically, longfin smelt was common in Humboldt Bay. However, no longfin smelt have been collected from Humboldt Bay in recent years despite extensive sampling of the estuary. Project construction would have no direct impacts on longfin smelt or its habitat in Humboldt Bay. There is no planned use of herbicides associated with the proposed project. Indirect impacts to this species could occur as a result of the accidental spill of pollutants or the temporary mobilization of sediment as a result of construction activities. Implementation of *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants* and *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* will reduce the potential for indirect impacts to this species due to the accidental spills of pollutants and the occurrence of erosion and sedimentation during construction to a less-than-significant level by developing and implementing a site-specific pollution prevention plan and SWPPP. There would be no impact on longfin smelt or its habitat as a result of project operation.

Southern Eulachon DPS. Suitable spawning habitat for southern eulachon DPS is not present in the proposed project area. However, anadromous fish use the estuarine environment of Humboldt Bay at least once when migrating to the ocean as juveniles, and at least once when returning to spawn. Eelgrass beds in the proposed project area provide potential refuge and forging habitat for anadromous fish and recent PALCO Marsh restoration activities have enhanced the connection between the marsh and the bay through actions such as culvert replacement, new channel construction, and tidal slough dredging. Eulachon may move through the project site in the tidal channels leading to and from PALCO Marsh, which may serve as rearing habitat. The critical habitat unit closest to the proposed project area is over 8 miles north, along the Mad River, which is not

tributary to Humboldt Bay. Project construction would have no direct impacts on southern eulachon DPS or its habitat in Humboldt Bay or PALCO Marsh. Indirect impacts to this species could occur as a result of the accidental spill of pollutants or the temporary mobilization of sediment as a result of construction activities. There is no planned use of herbicides associated with the proposed project. Implementation of *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants* and *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* will reduce the potential for indirect impacts to this species due to accidental spills of pollutants and the occurrence of erosion and sedimentation during construction to a less-than-significant level by developing and implementing a site-specific pollution prevention plan and SWPPP. There would be no impact on southern eulachon DPS or its habitat as a result of project operation.

Tidewater Goby. The extent, numbers and regularity to which tidewater goby utilize Humboldt Bay, PALCO Marsh, and habitats in the proposed project area are unknown. Habitat in the proposed project area is likely above the typical salinity for tidewater goby and none have been detected in Humboldt Bay environs as recently as 2010. The species is known to occur in Humboldt Bay—portions of which are designated as critical habitat. The proposed project area does not contain any critical habitat and tidewater goby has not been documented in the project area; therefore, the likelihood of the species occurring in the proposed project area is very low. Project construction would have no direct impacts on tidewater goby or its habitat in Humboldt Bay or PALCO Marsh. There is no planned use of herbicides associated with the proposed project. Indirect impacts to this species could occur as a result of the accidental spill of pollutants or the temporary mobilization of sediment as a result of construction activities. Implementation of *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants* and *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* will reduce the potential for indirect impacts to this species due to accidental spills of pollutants and the occurrence of erosion and sedimentation during construction to a less-than-significant level by developing and implementing a site-specific pollution prevention plan and SWPPP. There would be no impact tidewater goby or its habitat as a result of project operation.

Green Sturgeon Northern DPS. Green sturgeon northern DPS are known to spawn only in the Rogue, Klamath, and Eel Rivers. They are not expected to spawn in or adjacent to the proposed project area. However, green sturgeon are regularly taken in small numbers in Humboldt Bay and have been caught in coastal waters and in estuaries from Humboldt Bay to the Oregon border. Project construction would have no direct impacts on green sturgeon northern DPS or its habitat in Humboldt Bay. There is no planned use of herbicides associated with the proposed project. Indirect impacts to this species could occur as a result of the accidental spill of pollutants or the temporary mobilization of sediment as a result of construction activities. Implementation of *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants* and *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* will reduce the potential for indirect impacts to this species due to accidental spills of pollutants and the occurrence of erosion and sedimentation during construction to a less-than-significant level by developing and implementing a site-specific pollution prevention plan and SWPPP. There would be no impact on green sturgeon northern DPS or its habitat as a result of project operation.

Coastal Cutthroat Trout. Coastal cutthroat trout only rarely enter Humboldt Bay as they are primarily a freshwater species occurring in the streams in the Humboldt Bay basin. However, they may rear in the bay. Suitable spawning habitat for coastal cutthroat trout is not present in the proposed project area. The eelgrass beds in the proposed project area provide potential refuge and foraging habitat for juvenile coastal cutthroat trout. Further, following the planned restoration of

PALCO Marsh, coastal cutthroat trout may move through the proposed project area in the channels leading to and from PALCO Marsh, which may be used as rearing habitat. Project construction would have no direct impacts on coastal cutthroat trout or its habitat in Humboldt Bay and PALCO Marsh. There is no planned use of herbicides associated with the proposed project. Indirect impacts to this species could occur as a result of the accidental spill of pollutants or the temporary mobilization of sediment as a result of construction activities. Implementation of *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants* and *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* will reduce the potential for indirect impacts to this species due to accidental spills of pollutants and the occurrence of erosion and sedimentation during construction to a less-than-significant level by developing and implementing a site-specific pollution prevention plan and SWPPP. There would be no impact on coastal cutthroat trout or its habitat as a result of project operation.

Amphibians

Northern Red-legged Frog. Northern red-legged frogs were not observed during reconnaissance surveys of the site, but may occur in the fresh emergent wetlands in the project area. If present, they would likely disperse into adjacent riparian scrub during the non-breeding season. Northern red-legged frogs have been recorded in the project vicinity approximately 6-7 miles to the south and to the east in the Little Freshwater and Ryan Creek drainages; along the South Fork Elk River; and near an unnamed tributary to Willow Brook. During construction, activities in or near occupied habitat could result in the direct loss of the species. The species may also be indirectly affected if construction activities result in degradation of aquatic habitat and water quality due to erosion and sedimentation, accidental fuel leaks, and spills. Implementation of *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants* and *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* will reduce the potential for indirect impacts to this species due to accidental spills of pollutants and the occurrence of erosion and sedimentation during construction to a less-than-significant level by developing and implementing a site-specific pollution prevention plan and SWPPP. *Mitigation Measure BIO-4 – Frogs* includes presentation of a construction worker awareness program, pre-construction surveys for the species, and relocation of any observed frogs to a safe location outside of the construction. Implementation of these measures will ensure that any project-related impacts on northern red-legged frogs will be less than significant.

Birds

Brown Pelican. Brown pelicans commonly frequent Humboldt Bay for foraging, loafing, and roosting during the non-breeding season. Project activities would have little or no direct impact on brown pelicans as the project footprint does not extend into Humboldt Bay or PALCO Marsh. However, construction of the proposed trail could increase local ambient noise and may increase the number of people accessing the immediate shoreline for recreation and other activities. This could result in a small adverse effect on pelicans due to increased disturbance of foraging and roosting birds. Implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* will establish view and access sites along the new trail for the public, which will discourage unwanted access into sensitive habitat areas and reduce impacts resulting from increased noise and human disturbance to a less-than-significant level.

Northern Harrier. Locally, the northern harrier is a common migrant and winter resident, found in coastal marshes and grasslands near Humboldt Bay. It occurs in the area year around, but more commonly in winter. Although northern harriers have not been recorded nesting in the proposed project area, suitable habitat is present. Thus, there is a potential for nesting to occur within the

proposed project area and vicinity. If nesting occurs, construction disturbance (e.g., site grading) during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Loss of fertile eggs or nesting raptors, or any activities resulting in raptor nest abandonment, would be an adverse effect. In addition, vegetation management proposed along portions of the Phase A trail could slightly decrease the amount of suitable nesting and roosting habitat and could also result in a reduction in prey species (e.g., voles), a potentially adverse effect. Implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* will establish view and access sites along the new trail for the public, which will discourage unwanted access into sensitive habitat areas and reduce impacts resulting from increased noise and human disturbance to a less-than-significant level. *Mitigation Measure BIO-6 - Raptors* includes timing for vegetation removal to occur outside the nesting season for raptor species, pre-construction surveys to determine if nesting raptors are present or absent, and coordination with CDFW to establish construction-free buffer zones around active nests until young have fledged. These measures will reduce impacts on northern harrier to a less-than-significant level.

White-Tailed Kite. White-tailed kites occur regularly in the proposed project area and vicinity due to the presence of suitable foraging habitat—emergent marsh. Potential impacts on this species would be similar to those described for the northern harrier. Implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* will establish view and access sites along the new trail for the public, which will discourage unwanted access into sensitive habitat areas and reduce impacts resulting from increased noise and human disturbance to a less-than-significant level. *Mitigation Measure BIO-6 - Raptors* includes timing for vegetation removal to occur outside the nesting season for white-tailed kite, pre-construction surveys to determine if nesting kites are present or absent, and coordination with CDFW to establish construction-free buffer zones around active nests until young have fledged. These measures will reduce impacts on white-tailed kite to a less-than-significant level.

Short-eared Owl. Short-eared owls are known from wetland and agricultural areas surrounding Humboldt Bay, including the Humboldt Bay National Wildlife Refuge and Fay Slough, and Mad River Slough Wildlife areas. Nesting is very rare, but displaying birds have been seen at Humboldt Bay National Wildlife Refuge bordering the bay. Short-eared owls may occur in the proposed project area since suitable habitat is present. Potential impacts on this species would be similar to those described for the northern harrier. Implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* will establish view and access sites along the new trail for the public, which will discourage unwanted access into sensitive habitat areas and reduce impacts resulting from increased noise and human disturbance to a less-than-significant level. *Mitigation Measure BIO-6 - Raptors* includes timing for vegetation removal to occur outside the nesting season for short-eared owl, pre-construction surveys to determine if nesting owls are present or absent, and coordination with CDFW to establish construction-free buffer zones around active nests until young have fledged. These measures will reduce impacts on short-eared owl to a less-than-significant level.

Bald Eagle. Nesting habitat for the bald eagle is not present in or near the proposed project area, however, during the winter, bald eagles may occasionally forage along the margins of Humboldt Bay near the proposed trail. Pruning of some willows within Parcel 4 would result in a very small reduction of foraging and roosting habitat for this species. Due to the regional abundance of foraging habitat and the infrequency with which these species are expected to occur in the proposed project area, implementation of the proposed project will not result in a significant impact on bald eagles.

Peregrine Falcon. The peregrine falcon is present in the Humboldt Bay area where suitable coastal lowland habitats supporting prey species such as shorebirds and waterfowl occur. Peregrines forage along Humboldt Bay near the proposed project area, but the proposed project area does not provide breeding habitat. Due to the regional abundance of foraging habitat and the infrequency with which these species are expected to occur in the proposed project area, implementation of the proposed project will not result in a significant impact to peregrine falcon.

Vaux's Swift. The Vaux's swift is present in the Humboldt Bay area where suitable coastal lowland habitats supporting prey species such as shorebirds and waterfowl occur. Nesting habitat for the Vaux's swift is not present in the proposed project area. Potential impacts on this species would be similar to those described for northern harrier. Implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* will establish view and access sites along the new trail for the public, which will discourage unwanted access into sensitive habitat areas and reduce impacts resulting from increased noise and human disturbance to a less-than-significant level. *Mitigation Measure BIO-7 – Migratory and Special-Status Birds* includes timing for vegetation removal to occur outside the nesting season for Vaux's swift, pre-construction surveys to determine if nesting swifts are present or absent, and coordination with CDFW to establish construction-free buffer zones around active nests until young have fledged. These measures will reduce impacts on Vaux's swift to a less-than-significant level.

Purple Martin. Purple martin is an occasional visitor during the spring and fall, foraging in the coastal lowlands of Humboldt Bay. No suitable nesting sites occur in the proposed project area. Potential impacts on this species would be similar to those described for northern harrier. Implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* will establish view and access sites along the new trail for the public, which will discourage unwanted access into sensitive habitat areas and reduce impacts resulting from increased noise and human disturbance to a less-than-significant level. *Mitigation Measure BIO-7 – Migratory and Special-Status Birds* includes timing for vegetation removal to occur outside the nesting season for purple martin, pre-construction surveys to determine if nesting martins are present or absent, and coordination with CDFW to establish construction-free buffer zones around active nests until young have fledged. These measures will reduce impacts on purple martin to a less-than-significant level.

Loggerhead Shrike. Loggerhead shrike is a rare visitor during the spring, winter, and fall, foraging in the coastal lowlands of Humboldt Bay. No suitable nesting sites occur in the proposed project area. Potential impacts on this species would be similar to those described for northern harrier. Implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* will establish view and access sites along the new trail for the public, which will discourage unwanted access into sensitive habitat areas and reduce impacts resulting from increased noise and human disturbance to a less-than-significant level. *Mitigation Measure BIO-7 – Migratory and Special-Status Birds* includes timing for vegetation removal to occur outside the nesting season for loggerhead shrike, pre-construction surveys to determine if nesting shrikes are present or absent, and coordination with CDFW to establish construction-free buffer zones around active nests until young have fledged. These measures will reduce impacts on loggerhead shrike to a less-than-significant level.

Little Willow Flycatcher. Little willow flycatcher is an occasional visitor during the spring, winter, and fall, foraging in the coastal lowlands and riparian areas of Humboldt Bay. Although the proposed project area and vicinity provides suitable foraging and breeding habitat, there have been very few documented occurrences of nesting in Humboldt County since the 1930's. Little willow flycatcher have

not been recorded nesting in the proposed project area, but suitable habitat is present. Thus, there is the potential for nesting to occur on the site. If nesting occurs, construction disturbance (e.g., site grading) during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Loss of fertile eggs or nesting songbirds, or any activities resulting in songbird nest abandonment would be an adverse effect. In addition, removal of trees and other vegetation along portions of the Phase A trail could result in the direct loss of a nest and would slightly decrease the amount of suitable nesting and roosting habitat in the proposed project area. Implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* will establish view and access sites along the new trail for the public, which will discourage unwanted access into sensitive habitat areas and reduce impacts resulting from increased noise and human disturbance to a less-than-significant level. *Mitigation Measure BIO-7 – Migratory and Special-Status Birds* includes timing for vegetation removal to occur outside the nesting season for little willow flycatcher, pre-construction surveys to determine if nesting flycatchers are present or absent, and coordination with CDFW to establish construction-free buffer zones around active nests until young have fledged. These measures will reduce impacts on little willow flycatcher to a less-than-significant level.

Yellow-breasted Chat. Yellow-breasted chat is present seasonally as a breeder in riparian areas in Humboldt Bay. Suitable breeding habitat is present in the willow thickets in Phase A. Potential impacts would be similar to those described for little willow flycatcher, except that there is a greater chance that yellow-breasted chat would be present as a nester. Implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* will establish view and access sites along the new trail for the public, which will discourage unwanted access into sensitive habitat areas and reduce impacts resulting from increased noise and human disturbance to a less-than-significant level. *Mitigation Measure BIO-7 – Migratory and Special-Status Birds* includes timing for vegetation removal to occur outside the nesting season for yellow-breasted chat, pre-construction surveys to determine if nesting chats are present or absent, and coordination with CDFW to establish construction-free buffer zones around active nests until young have fledged. These measures will reduce impacts on yellow-breasted chats to a less-than-significant level.

Yellow Warbler. Yellow warbler is present seasonally as a breeder in riparian areas in Humboldt Bay. Suitable breeding habitat is present in the riparian scrub in Phase A. Potential impacts would be similar to those described for little willow flycatcher, except that there is a greater chance that yellow warbler would be present as a nester. Implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* will establish view and access sites along the new trail for the public, which will discourage unwanted access into sensitive habitat areas and reduce impacts resulting from increased noise and human disturbance to a less-than-significant level. *Mitigation Measure BIO-7 – Migratory and Special-Status Birds* includes timing for vegetation removal to occur outside the nesting season for yellow warbler, pre-construction surveys to determine if nesting warblers are present or absent, and coordination with CDFW to establish construction-free buffer zones around active nests until young have fledged. These measures will reduce impacts on yellow warbler to a less-than-significant level.

Mammals

Bats. Potential bat roost structures are not present in the proposed project area and the abandoned buildings in Parcel 4 are unlikely to provide suitable roosting habitat due to disturbance related to the day-to-day activities of the homeless and transient individuals that inhabit Parcel 4. Project construction and operation are not likely to impact roosting bats due to the absence of suitable

roosting habitat within the proposed project area. No impacts to bats or their habitat are anticipated as a result of this project.

Other Sensitive Biological Species

Migratory Birds. The proposed project area and vicinity provides habitat for numerous migratory birds including waterfowl, shorebirds, and songbirds, which are protected under the federal Migratory Bird Treaty Act. Humboldt Bay hosts a large winter waterfowl population and a small, but significant suite of breeding waterfowl species. The coastal wetlands of Humboldt Bay are a critical resource for shorebirds. Humboldt Bay is recognized as a site of International Importance for shorebirds by the Western Hemisphere Shorebird Reserve Network (i.e., greater than 100,000 shorebirds/year or greater than 10 percent of a flyway population). Wetlands within and adjacent to the proposed project area—particularly those associated with PALCO Marsh—provide shorebird habitat while riparian areas host numerous species of migratory songbirds.

Potential long-term effects to a number of migratory bird species found in the proposed project area revolve around the anticipated increased recreational use of the area. Increased human activity and noise along the bay waterfront and around habitats that are used extensively by migratory birds, such as PALCO Marsh and the adjacent riparian areas could discourage birds from using these areas for nesting. Implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* will establish view and access sites along the new trail for the public, which will discourage unwanted access into sensitive habitat areas and reduce impacts resulting from increased noise and human disturbance to a less-than-significant level. *Mitigation Measure BIO-7 – Migratory and Special-Status Birds* includes timing for vegetation removal to occur outside the nesting season for migratory birds, pre-construction surveys to determine if nesting migratory birds are present or absent, and coordination with CDFW to establish construction-free buffer zones around active nests until young have fledged. These measures will reduce impacts on nesting migratory birds to a less-than-significant level.

IVb) Less than Significant with Mitigation Incorporated. ESHA within and immediately adjacent to the proposed project area includes coastal salt marsh, sloughs, and ditches. Coastal salt marsh in the proposed project area and vicinity is largely comprised of PALCO Marsh, but extends into other plant community types within the project, including estuarine emergent wetland and palustrine emergent wetland. Permanent impacts would occur where the footprint of the proposed trail overlaps mapped waters of the United States and waters of the State. Project construction could result in the permanent loss of up to 0.042 acre of palustrine emergent vegetation (three-parameter wetland) depending on whether footings for the pedestrian bridge in Segment 1 (drainage ditch just south of Del Norte Street) are required. (Note – following completion of the geotechnical report, a determination will be made during the final design phase as to whether footings will be required. Impacted acreage may be further reduced during the final project design phase). The paved portion of the trail would be 10 feet throughout most of the project, but would narrow to 8-feet wide along portions of PALCO Marsh and just north of Chevron property to avoid direct impacts to jurisdictional waters and ESHA.

Approximately 0.009 acre of waters of the State (i.e., one- and two-parameter wetlands) could be permanently impacted by project construction at four locations along the Phase A trail alignment. These impacted wetland types, which are also considered ESHAs under the California Coastal Act and Policy 6.A.6 of the City's General Plan/Local Coastal Program, would consist of estuarine emergent wetland (0.005 acre east of the Chevron facility and south of Parcel 4), palustrine emergent wetland

(0.002 acre just north of Vigo Street), and riparian scrub (0.002 acre in two adjacent locations south of Vigo Street). Construction activities associated with the proposed project could result in temporary impacts on a worst-case estimate of up to 0.241 acre of waters of the State, including the following vegetation communities: estuarine emergent wetland (0.044 acre), palustrine emergent wetland (0.134 acre), and riparian scrub (0.063 acre) along various segments of the proposed Phase A trail (Note – final impact acreages will be refined and likely reduced during the final project design phase, prior to project permitting).

Project construction would indirectly impact a part of a tidal slough where eelgrass (*Zostera marina*)—designated as Essential Fish Habitat—is known to occur. Degraded water quality such as would result from turbidity over an extended period of time could adversely impact eelgrass by decreasing the amount of light available for photosynthesis.

Although the project area is currently degraded due transient activity and lack of a formalized trail system for public use, project operation could have an impact on waters of the State and ESHAs due to increased public use of the new trail system. There is potential that increased public usage could result in off-trail foot traffic through sensitive areas. This would be a potentially significant impact.

Implementation of *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* will reduce the potential for indirect impacts to waters of the State and ESHA’s due to the occurrence of erosion and sedimentation during construction to a less-than-significant level by developing and implementing a site-specific SWPPP that will prevent sediment transport into adjacent surface waters. Implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* will establish view and access sites along the new trail for the public, which will discourage unwanted access into sensitive habitat areas and reduce impacts resulting from increased noise and human disturbance. Implementation of *Mitigation Measure BIO-8 – Eel Grass* will ensure that eel grass beds are not impacted by the project by surveying for eel grass beds and avoiding them during final project design. Implementation of *Mitigation Measure BIO-9 Prevention of Spread of Invasive Species* includes measures to avoid the spread of invasive species, including use of weed-free equipment, mulches, and native seed mixed and vegetation material. *Mitigation Measure BIO-10 – Waters of the United States/Waters of the State* will be implemented to ensure that project construction impacts on waters of the State, including wetlands, would be less than significant by avoiding impacts to jurisdictional waters to the extent feasible during final design and by providing compensatory mitigation for any unavoidable impacts, at a minimum 2:1 ratio or other ratio agreed to by the City and the pertinent regulatory agencies. All of these mitigation measures will reduce impacts on waters of the State and ESHA to a less-than-significant level and ensure that project complies with Policy 6.A.7 and 6.A.19 of the City’s General Plan/Local Coastal Program and applicable sections of the California Coastal Act (Sections 30108, 30108.2, 30230, and 30233(a)).

IVc) Less than Significant with Mitigation Incorporated. Implementation of the proposed project could permanently impact approximately 0.042 acre of waters of the United States (palustrine emergent wetland). (Note: this impact acreage is a worst—case assumption, the City will explore opportunities to further reduce impacts on jurisdictional waters during the final design phase for the project). Permanent impacts would occur where the footprint of the proposed trail overlaps mapped waters of the United States. No temporary impacts on jurisdictional waters are anticipated to occur since all construction staging would be located in upland areas and construction equipment access would be limited to the same proposed trail footprint used for calculating permanent impacts. In those sections where there are jurisdictional wetlands the trail would be narrowed to an 8-foot paved

section—instead of 10-feet—with two 2-foot unpaved shoulders to minimize impacts. Abutment footings for the pedestrian bridge proposed to cross a drainage ditch just south of Del Norte Street could result in the discharge of fill into 0.042 acre of palustrine emergent wetland. Complete avoidance of waters (i.e. the drainage ditch below the ordinary high water mark) may not be feasible (Note: following completion of the geotechnical report, a determination will be made as to whether footings would need to be constructed below the ordinary high water mark; if not; permanent impacts on the feature may be avoided). If complete avoidance is not feasible, *Mitigation Measure BIO-10 – Waters of the United States/Waters of the State* will be implemented to ensure that project construction impacts on waters of the United States, including wetlands, would be less than significant by avoiding impacts to jurisdictional waters to the extent feasible during final design and by providing compensatory mitigation for any unavoidable impacts, at a minimum 2:1 ratio or other ratio agreed to by the City and the pertinent regulatory agencies.

IV d) Less-than-Significant Impact. The project does not include any features that would 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. The proposed trail alignment would follow existing roads, trails, and railroad corridors.

IV e) Less-than-Significant Impact. The project would be constructed in compliance with City policies or ordinances protecting biological resources, including all applicable policies of the City's General Plan and Local Coastal Program (LCP). General Plan/Coastal Land Use Plan policies particularly germane to this project are provided below, followed by a discussion that describes how the proposed project is consistent with each policy. City of Eureka coastal zoning regulations mirror these policies.

LCP Policy 6.A.7 – Within the Coastal Zone, the City shall ensure that environmentally sensitive habitat areas are protected against any significant disruption of habitat values, and that only uses dependent on such resources shall be allowed within such areas. The City shall require that development in areas adjacent to environmentally sensitive habitat areas be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas. *Consistency Determination:* The purpose of the project is to improve coastal access for the public within an area that has already been degraded due to transient encampments. As provided under the Coastal Act policy consistency discussion below in this section, the trail would be allowable use in ESHA. As part of the final design phase, the City will reduce the width of the trail from 10 feet to 8 feet in ESHAs. Proposed mitigation measures addressing construction and operation of the trail will minimize impacts to sensitive species, water quality and other elements associated with ESHA. Therefore, the proposed project is consistent with this policy.

LCP Policy 6.A.9. – The City shall permit the diking, filling or dredging of open coastal waters, wetlands, or estuaries only under the following conditions:

- a. The diking, filling or dredging is for a permitted use in that resource area;
- b. There is no feasible, less environmentally damaging alternative;
- c. Feasible mitigation measures have been provided to minimize adverse environmental effects;
- d. The functional capacity of the resource area is maintained or enhanced.

Consistency Determination: As described above for LCP Policy 6.A.7, the City will design the trail to minimize impacts to ESHA by reducing trail width from 10 feet to 8 feet in sensitive areas. Since the area is already severely degraded due to prior human disturbance and on-going transient activity, the proposed project will actually enhance the functional capacity of the resource area through removal of encampments, associated trash and debris, and non-native vegetation. Additionally, the City is proposing several mitigation measures to avoid or minimize potential impacts to the environment associated with both construction and operation of the trail. As provided under the Coastal Act policy consistency discussion below in this section, the Phase A trail is an allowable use within the wetland and other ESHA in the project area. Therefore, the proposed project is consistent with this policy.

LCP Policy 6.A.11 – The City shall require that diking, filling or dredging of a wetland or estuary maintain or enhance the functional capacity of these resources. Functional capacity means the ability of the wetland or estuary to be self-sustaining and to maintain natural species diversity. In order to establish that the functional capacity is being maintained, all of the following must be demonstrated.

- a. Presently-occurring plant and animal populations in the ecosystem will not be altered in a manner that would impair the long-term stability of the ecosystem, i.e., natural species diversity, abundance and composition are essentially unchanged as the result of the project;
- b. A species that is rare, threatened, or endangered will not be significantly adversely affected; and
- c. Consumptive (e.g., fishing, aquaculture and hunting) or nonconsumptive (e.g., water quality and research opportunity) values of the wetland or estuary ecosystem will not be significantly reduced.

Consistency Determination: As described under IV.a., the proposed project will not adversely affect a rare, threatened, or endangered species. For all other special-status plant and animal species potentially affected by the project, mitigation measures will be implemented by the City to avoid, minimize and/or reduce impacts to ensure that the long-term stability of the local ecosystem will not be impaired. Since the area is already severely degraded due to prior human disturbance and on-going transient activity, the proposed project will actually enhance both consumptive and nonconsumptive wetland and ecosystem values along Humboldt Bay. Therefore, the proposed project is consistent with this policy.

Section 30233(a) of the Coastal Act states that *“The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following...”* Sections 30233(a)(1-7) then proceed to identify the seven permissible uses allowed, including (7) nature study, aquaculture, or similar resource dependent activities. Section 30233(c) requires that filling of wetland shall maintain or enhance the functional capacity of the wetland.

Consistency Determination: “Nature study” is formally defined as “the study of animals and plants in the natural world, usually at an elementary level.” By providing opportunities for incidental exploration of the physical and biological world, trails in natural settings are generally recognized as

one of the best ways to ensure continued public support to protecting ESHAs and to encourage the appropriate level of visitation. This trail, through riparian corridors and shoreline areas such as those present along the Phase A trail alignment, may similarly be considered a form of “nature study” as they are a development type integral to appreciation and comprehension of biophysical elements that comprise riparian areas and are dependent upon the presence of the natural area resource through which they pass to provide a nature study experience.

The Coastal Commission has considered the development of new recreational trail segments through wetlands and other environmentally sensitive resource areas, where design efforts have been made to minimize such intrusions to the smallest feasible area or least impacting routes, and where the trail segment functions as a nature trail, to be a form of “nature study... or similar resource dependent activities” as noted in the Coastal Commission coastal development permit staff report dated 2-23-12 for the Elk River Access Area/Hikshari’ Trail Project. The Eureka Waterfront Trail Phase A Project would therefore be considered to be a form of “nature study”, and thus considered an allowable use in or near a wetland or other ESHA pursuant to Section 30233(a)(7).

For uses allowed within a wetland or other ESHA, it must be demonstrated that there is no less environmentally damaging feasible alternative to locating the development in or near the wetland/ESHA; that locating development in a wetland/ESHA would not be disrupt habitat values; and that development adjacent to an ESHA is sited and designed to prevent impacts that would significantly degrade the ESHA and is compatible with the continuance of the habitat area. Similar to the Elk River Access Area/Hikshari’ Trail Project, the City anticipates that the Eureka Waterfront Trail Phase A Project can be allowed within wetland and other ESHAs. Regarding feasible alternatives, as a coastal trail meant to provide access to and along the shoreline and nature study opportunities, proximity to the bay and associated ESHA is integral to fulfilling the purpose of the project. The project has been designed to avoid and/or minimize ESHA impacts to the extent practicable (e.g. by taking advantage of existing roadways and trails and by reducing trail width where the trail traverses ESHA), with final trail design anticipated to further minimize such impacts where feasible. Given that the project area is already severely degraded, removal of transient encampments, associated trash and debris, and non-native vegetation will actually enhance the overall habitat values. Proposed mitigation measures will serve to minimize construction impacts to the environment, including water quality, sensitive species, and other ESHA elements, as well as trail operation impacts to these various elements. Therefore, the proposed project is consistent with this Coastal Act policy.

As noted above, the proposed project is consistent with applicable local and Coastal Act policies protecting biological resources. This impact would therefore be less than significant.

IV f) Less-than-Significant Impact. The project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. The proposed project will be consistent with the Humboldt Bay Management Plan, the Humboldt Bay Watershed Salmon and Steelhead Conservation Plan, and the City’s Local Coastal Program.

FINDINGS: With the incorporation of mitigation, the proposed project would have a less than significant adverse impact on biological resources (See also Mitigation Measures in the Hydrology and Water Quality Section of this Initial Study).

MITIGATION MEASURES

Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants: Construction specifications shall include the following measures to reduce potential impacts on vegetation and aquatic resources in the project area as a result of the accidental spill of pollutants (e.g., fuel, oil, and grease):

- A site-specific spill prevention plan shall be implemented for potentially hazardous materials. The plan shall include the proper handling and storage of all potentially hazardous materials, as well as the proper procedures for cleaning up and reporting any spills. If necessary, containment berms shall be constructed to prevent spilled materials from reaching surface water features.
- Equipment and hazardous materials shall be stored 50 feet away from surface water features, including but not limited to Humboldt Bay and PALCO Marsh.
- Vehicles and equipment used during construction shall receive proper and timely maintenance to reduce the potential for mechanical breakdowns leading to a spill of materials. Maintenance and fueling shall be conducted in an area at least 150 feet away from surface water including but not limited to Humboldt Bay and PALCO Marsh.
- Equipment operating within the mean high water line shall use non-toxic vegetable oil for operating hydraulic equipment instead of traditional hydraulic fluids.
- Equipment used during construction shall be equipped with an emergency spill kit for rapid containment and cleanup of a spill, and personnel shall be adequately trained to respond to an emergency spill.

Timing/Implementation: During construction
Enforcement: City Parks & Recreation Department, Corps, North Coast Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW)
Monitoring: City and/or its contractor
Evidence of Compliance: Completion of and adherence to required documents and measures.

Mitigation Measure BIO-2 – Special-Status Plants: In addition to the implementation of *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants*, the following measures will be used to avoid or minimize impacts on special-status plants:

- During the final design of the proposed project, the known populations of special-status plants, including, but not limited to Point Reyes bird’s-beak within 100 feet of the project boundary shall be included in the engineering drawings, and all construction activities shall be designed and conducted to avoid impacts to the populations to the maximum extent feasible.
- As special-status plant locations may vary from year to year, a targeted protocol-level seasonally appropriate botanical survey of the proposed project area and an area within 100

feet of the project area shall be conducted prior to the start of ground disturbing activities during each year of construction.

- Prior to the start of construction activities in the proposed project area, exclusionary fencing shall be erected around the special-status plant populations. A qualified botanist shall be present to assist with locating the populations. The exclusionary fencing shall be periodically inspected throughout each period of construction and be repaired as necessary. All pedestrian and vehicular entry into the avoidance areas delineated by the fencing shall be prohibited during construction.
- If a population cannot be fully avoided, the City shall retain a qualified botanist who shall contact CDFW to determine the appropriate salvage and relocation measures, which shall be implemented.

Timing/Implementation: Prior to, during, and after construction
Enforcement: City Parks & Recreation Department, CDFW
Monitoring: City and/or its contractor
Evidence of Compliance: Completion of and adherence to required documents and measures.

Mitigation Measure BIO-3 – Erosion and Sedimentation Control: Erosion control measures shall be implemented during construction of the proposed project. These measures shall conform to the provisions in Section 20-2 and 20-3 of the Caltrans Standard Specifications and the special provisions included in the contract for the project. Such provisions include the preparation of a Storm Water Pollution Prevention Plan (SWPPP), which describes and illustrates the best management practices (BMPs) for the project site.

Erosion control measures to be included in the SWPPP or to be implemented by the City include, but are not limited to, the following:

- To the maximum extent practicable, activities that increase the erosion potential in the project area shall be restricted to the relatively dry summer and early fall period to minimize the potential for rainfall events to transport sediment to Humboldt Bay, PALCO Marsh, and other surface water features. In-channel construction shall be conducted between June 15- and October 31 and upland construction will likely occur throughout the year as long as work activities comply with the conservation, avoidance, and minimization measures identified herein for the protection of other sensitive or special-status plant or animal species. For upland construction activities that must take place during the late fall, winter, or spring, temporary erosion and sediment control structures shall be in place and operational during construction as needed and at the end of each construction day and maintained until permanent erosion control structures are in place.
- Areas where wetland and upland vegetation need to be removed shall be identified in advance of ground disturbance and limited to only those areas that have been approved by the City as part of the final design plans. Temporary construction fencing will be installed around ESHAs that do not need to be disturbed.

- Within 10 calendar days of completion of construction in those areas where subsequent ground disturbance will not occur within 10 calendar days or more, weed-free mulch shall be applied to disturbed areas to reduce the potential for short-term erosion. Prior to a rain event or when there is a greater than 50 percent possibility of rain within the next 24 hours, as forecasted by the National Weather Service, weed-free mulch shall be applied to all exposed areas upon completion of the day's activities. Soils shall not be left exposed during the rainy season.
- Suitable BMPs, such as silt fences, straw wattles, or catch basins, shall be placed below all construction activities at the edge of surface water features to intercept sediment before it reaches the waterway. These structures shall be installed prior to any clearing or grading activities. Further, sediment built up at the base of BMPs will be removed before BMP removal to avoid any accumulated sediments from being mobilized post-construction.
- If spoil sites are used, they shall be located such that they do not drain directly into a surface water feature, if possible. If a spoil site drains into a surface water feature, catch basins shall be constructed to intercept sediment before it reaches the feature. Spoil sites shall be graded and vegetated with native species to reduce the potential for erosion.
- Sediment control measures shall be in place prior to the onset of the rainy season and will be monitored and maintained in good working condition until disturbed areas have been revegetated with native species.
- Any new or previously excavated gravel material placed in the channel shall meet Caltrans' cleanness test indicating the relative proportions of clay-sized material clinging to coarse aggregate and screenings (California Test No. 227) with a value of 85 or higher (excluding such materials as soil in the rock slope protection [RSP] to allow for riparian planting).

Timing/Implementation: Prior to, during, and after construction
Enforcement: City Parks & Recreation Department, Corps, North Coast
RWQCB, CDFW, Caltrans
Monitoring: City and/or its contractor
Evidence of Compliance: Completion of and adherence to required documents and measures.

Mitigation Measure BIO-4 –Frogs: In addition to the implementation of Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants and Mitigation Measure BIO-3 – Erosion and Sedimentation Control, the following measures will be used to avoid or minimize impacts on northern red-legged frogs:

- Prior to construction, the City shall retain a qualified biologist to present a Worker Environmental Awareness Program. The program shall provide construction workers, contractors, and subcontractors with information on their responsibilities with regard to sensitive biological resources.
- Suitable habitat for the northern red-legged frog is present in the proposed project area and individuals could move onto the site at any time. Thus, a pre-construction survey for the species is necessary to confirm its status (presence/absence) in the project area immediately

prior to the onset of construction. The City shall retain a qualified biologist to conduct a pre-construction survey for the northern red-legged frog including the area within 50 feet of suitable habitat (wetlands) immediately prior to construction. Surveys shall be conducted each day in those areas where frogs could potentially be impacted. If a northern red-legged frog is found, the biologist shall move it to suitable habitat in a safe location outside of the construction zone. In the event that a frog is observed in an active construction zone, the contractor shall immediately halt construction activities until a biologist has moved the frog to a safe location in similar habitat outside of the construction zone.

Timing/Implementation: Prior to and during construction
Enforcement: City Parks & Recreation Department, CDFW, Caltrans
Monitoring: City and/or its contractor
Evidence of Compliance: Completion of and adherence to required documents and measures.

Mitigation Measure BIO-5 – Management of Human Disturbance: The City shall manage visitor use and recreation in and around the proposed project area to avoid disturbance of wildlife foraging and roosting along Humboldt Bay, PALCO Marsh, and in associated wildlife habitats. Management shall include establishment of view and access sites that allow the public to see and access the Bay and PALCO Marsh for recreation and wildlife viewing, and posting of signs to thereby discourage access in other sites. The number and physical distribution of these access sites shall be designed in a manner that encourages appreciation for the flora and fauna of the area while reducing disturbance and other activities that are detrimental to vegetation and wildlife.

Timing/Implementation: Project design
Enforcement: City Parks & Recreation Department, CDFW, CCC, Caltrans
Monitoring: City and/or its contractor
Evidence of Compliance: Adherence to requirements.

Mitigation Measure BIO-6 – Raptors: In addition to the implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* the following measures will be used to avoid or minimize impacts on raptors:

- Construction shall be scheduled to avoid the nesting season to the extent feasible. The nesting season for most raptors in Humboldt County extends from March through August. Thus, if construction can be scheduled to occur between September and February the nesting season will be avoided and no impacts on nesting raptors would be expected. If it is not possible to schedule construction during this time, the remainder of this mitigation measure shall be implemented:
- If vegetation is to be removed by the project and all necessary approvals have been obtained, potential nesting habitat (e.g., trees) that will be removed should be removed outside the nesting season, if feasible. This will help preclude nesting and substantially decrease the likelihood of direct impacts.
- Pre-construction surveys for nesting raptors shall be conducted by a qualified biologist to ensure that no nests will be disturbed during project implementation. These surveys shall be

conducted no more than 7 days prior to the initiation of construction activities, or re-initiation of construction activities if they have ceased for more than 7 days. During this survey, the biologist shall inspect all potential nesting habitat for raptor nests where project activities could potentially result in disturbance to nesting raptors, including areas of direct impact plus an area extending at least 500 feet from the perimeter of the project area.

- If an active raptor nest is found within the survey area (i.e., within 500 feet), or beyond the survey area but in a location where there could be potential disturbance associated with construction activities, the biologist, in consultation with the CDFW, shall determine the extent of a construction-free buffer zone to be established around the nest, or shall develop and agree upon construction methods that will allow work to continue without disturbing an active nest. Active nests may not be removed until after the young have fledged (based on field verification). A qualified biologist shall monitor the nest for disturbance and evidence of fledgling during construction and until the young have fledged and submit status reports to the CDFW throughout the nesting season. If evidence of disturbance to an active nest is observed as a consequence of construction activities, construction activities shall immediately cease until such time as the birds of fledged or construction protocol is revised so as not to disturb nesting birds or fledglings.

Timing/Implementation: Prior to and during construction
Enforcement: City Parks & Recreation Department, CDFW, Caltrans
Monitoring: City and/or its contractor
Evidence of Compliance: Completion of and adherence to required documents and measures.

Mitigation Measure BIO-7 – Migratory and Special-Status Birds: In addition to the implementation of *Mitigation Measure BIO-5 – Management of Human Disturbance* the following measures shall be implemented to avoid or minimize the potential for project-related impacts on migratory birds:

- Grading and other construction activities shall be scheduled to avoid the nesting season to the extent possible. The nesting season for these species extends from March through August. If construction occurs outside of the breeding season, no further mitigation is necessary. If the breeding season cannot be completely avoided, the remainder of this mitigation measure shall be implemented.
- Pre-construction surveys for migratory and special status birds shall be conducted by a qualified biologist to ensure that no nests will be disturbed during project implementation. These surveys shall be conducted no more than 7 days prior to the initiation of construction activities, or re-initiation of construction activities if they have ceased for more than 7 days. During this survey, the biologist shall inspect all potential nesting habitat for migratory and special-status bird nests where project activities could potentially result in disturbance to migratory or special status birds, including areas of direct impact plus an area extending at least 100 feet for non-special status migratory birds and 300 feet from the perimeter of the project area for special status birds.

- If an active nests is found within the survey area (i.e., within 100 or 300 feet), or beyond the survey area but in a location where there could be potential disturbance associated with construction activities, the biologist, in consultation with the CDFW, shall determine the extent of a construction-free buffer zone to be established around the nest, or shall develop and agree upon construction methods that will allow work to continue without disturbing an active nest. Active nests may not be removed until after the young have fledged (based on field verification). A qualified biologist shall monitor the nest for disturbance and evidence of fledging during construction and until the young have fledged, and submit status reports to the CDFW throughout the nesting season. If evidence of disturbance to an active nest is observed as a consequence of construction activities, construction activities shall immediately cease until such time as the birds have fledged or construction protocol is revised so as not to disturb nesting birds or fledglings. If vegetation is to be removed by the project and all necessary approvals have been obtained, potential nesting habitat (e.g., shrubs and trees) that will be removed by the project should be removed outside the nesting season, if feasible. This will help preclude nesting and substantially decrease the likelihood of direct impacts.

Timing/Implementation: Prior to and during construction
Enforcement: City Parks & Recreation Department, CDFW, Caltrans
Monitoring: City and/or its contractor
Evidence of Compliance: Completion of and adherence to required documents and measures.

Mitigation Measure BIO-8 – Eel Grass: In addition to the implementation of *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* the following mitigation will be implemented to avoid and minimize project impacts to eel grass:

- Prior to the onset of construction, the City will mark all eelgrass populations within the project boundary. Eelgrass populations will be avoided to the maximum extent feasible.

Timing/Implementation: Prior to and during construction
Enforcement: City Parks & Recreation Department, CDFW, CCC
Monitoring: City and/or its contractor
Evidence of Compliance: Completion of and adherence to required documents and measures.

Mitigation Measure BIO-9 – Prevention of Invasive Plant Species: The following measures shall be implemented to prevent the spread of invasive species in the proposed project area:

- All equipment used for off-road construction activities shall be weed-free prior to entering the proposed project area.
- If project implementation calls for mulches or fill, they shall be weed free.
- Revegetation of disturbed sites shall be performed only with sterile non-native grasses and other native vegetation obtained from local genetic stocks within Sonoma, Mendocino,

Humboldt, or Del Norte Counties within 30 miles of the coast. Sterile non-native annual grasses shall comprise no more than 50% of the erosion control seed mixture to be planted (by weight of seed), with the remaining seed composed of native species. If documentation is provided that demonstrates that native vegetation from local genetic stock is not available, native vegetation obtained from genetic stock outside the local area, but from within the adjacent region of the floristic province, may be used. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, or by the State of California shall be planted or allowed to naturalize or persist on the parcel. No plant species listed as a 'noxious weed' by the State of California or the U.S. Federal Government shall be utilized within the property.

Timing/Implementation: Prior to, during, and after construction
Enforcement: City Parks & Recreation Department, CDFW, CCC
Monitoring: City and/or its contractor
Evidence of Compliance: Adherence to required measures.

Mitigation Measure BIO-10 – Waters of the United States/Waters of the State:

Implementation of Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants and Mitigation Measure BIO-3 – Erosion and Sedimentation Control will protect waters of the United States from potential indirect impacts. To address potential temporary impacts to waters of the State by ensuring that disturbed areas are restored to pre-project conditions, the City shall implement the following measures:

- The width of the construction disturbance zone within wetlands shall be minimized through careful preconstruction planning.
- Where possible, temporary impacts on woody riparian vegetation shall be minimized by trimming trees and shrubs rather than removing entire woody plants or by cutting trees or shrubs at least 1 foot above ground level to leave root systems intact and allow more rapid regeneration following construction.
- For herbaceous wetland areas, City shall include provisions in the constructions plans and specifications for the contractor to place steel mats, when feasible, over wetland areas to allow for construction equipment access and to prevent rutting. The mats would then be removed as construction is completed for each trail segment.
- In areas where excavation may occur, the City shall include provisions in the constructions plans and specifications for the contractor to temporarily stockpile the top 6 to 12 inches of excavated material, keep the material moist, and then return this material as backfill into the top of temporarily excavated areas.
- Following completion of the trail system, any impacted area shall be restored to pre-project grade. Any wetland areas left bare following construction shall be revegetated using native vegetation.

To the extent practicable, the discharge of dredged or fill material into waters of the United States, including wetlands, shall be avoided (this also includes waters not subject to Corps jurisdiction, but

subject to North Coast RWQCB or California Coastal Commission jurisdiction). However, complete avoidance may not be feasible (Note: following completion of the geotechnical report, a determination will be made during the final design phase as to whether footings for the pedestrian bridge in Segment 1 (drainage ditch just south of Del Norte Street) would need to be constructed or not; if footings are not required, permanent impacts may be potentially avoided). If discharge of fill into a waters of the United States or waters of the State cannot be completely avoided, the remainder of this mitigation measure shall be implemented:

- The City will apply for the appropriate permits from the Corps, North Coast RWQCB, California Coastal Commission, and the CDFW and will comply with the conditions of each respective permit.
- Impacts on jurisdictional waters will be compensated at a minimum 2:1 ratio or other ratio as agreed by the City and the Corps, North Coast RWQCB, California Coastal Commission, and the CDFW (Note: The City has concluded that a 2:1 ratio is sufficient for the following reasons: 1) the low quality of potentially impacted wetlands habitat within the project area due to prior disturbance; and 2) overall enhancement of the project area associated with removal of transient encampments, debris, and non-native vegetation). Compensation for the loss of wetlands would be completed through on-site creation. In addition to creation, potential restoration, enhancement, and/or preservation activities may be considered as well by the agencies as part of the overall mitigation strategy. Assuming a 2:1 creation ratio, since up to maximum of 0.042 acre of Corps jurisdiction and 0.009 acre of State jurisdiction may be impacted by the project (Note: these impacts may be further reduced during the final design phase), up to 0.102 acre of new wetlands will need to be created. Potential mitigation locations include Parcel 4 and the City-owned property associated with Phase C of the Waterfront Trail. These properties contain areas of adequate size that provide necessary conditions to accomplish the potential mitigation requirements.
- A Wetlands Mitigation and Monitoring Plan shall be prepared and provided to the Corps, North Coast RWQCB, California Coastal Commission, and the CDFW for review and approval. This Plan shall include the following elements: description and size of mitigation area; site preparation and design; plant species; planting design and techniques; maintenance activities; plant storage; irrigation requirements; success criteria; monitoring schedule; and remedial measures. Following approval by the pertinent regulatory agencies, the Plan will be implemented by the City.

Timing/Implementation: Prior to, during, and after construction
Enforcement: City Parks & Recreation Department, Corps, North Coast RWQCB, CDFW, CCC
Monitoring: City
Evidence of Compliance: Completion of and adherence to required documents and measures.

| 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 as defined in '15064.5? | | ✓ | | |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5? | | ✓ | | |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | | | | ✓ |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | | ✓ | | |

THRESHOLDS OF SIGNIFICANCE: This Initial Study considers to what degree the proposed project would cause (a) physical changes in known or designated historical resources, or in their physical surroundings, in a manner that would impair their significance; (b) physical changes in archaeological sites that represent important or unique archaeological or historical information; (c) unique paleontological resource site or unique geologic feature; or (d) disturbance of human burial locations.

DISCUSSION

The following responses are based on the Archaeological Survey Report [ASR] for the Eureka Waterfront Trail Project Phase A and B Located in Eureka, Humboldt County, California (Roscoe and Associates 2014) and the Historical Resources Evaluation Report [HRER], Eureka Waterfront Trail Project Phase A and B (JRP Historical Consulting LLC 2014). The full text of the ASR is not included in this Initial Study because of its confidential nature. The report is available for review by qualified persons (e.g., archaeologists, Tribal Historic Preservation Officers, etc.) at the City of Eureka Community Development Department at 531 K Street, Eureka.

Ethnography: The project area lies within the traditional territory of the Wiki division of the Wiyot, which occupied lands adjacent to Humboldt Bay. Around A.D. 900, the Wiyot entered and occupied the lower Klamath River and adjacent coast, leaving behind their mid-Columbia River homeland. Some 200 years later, the Yurok moved down the Klamath River from a northern origin, settling along the lower Klamath and displacing the Wiyot to the vicinity of the Humboldt Bay.

Local History: The project area occurs on former tidelands and estuarine deposits. The project area once consisted of extensive freshwater and salt marshes. In 1854, early settlements in the area included the town of Bucksport to the south and Fort Humboldt on the bluff to the east. In 1870, wetlands occurring between A Street and Bucksport were diked to create agricultural pastureland.

A racetrack was developed north of Del Norte Street and was first used for racing horses and eventually automobiles. In 1901, the existing agricultural dikes were improved to support the Northwestern Pacific Railroad. The diking activity and placement of fill for the railroad resulted in the conversion of salt marsh in the PALCO Marsh area due to retention of freshwater and surface runoff on the site.

The Holmes-Eureka lumber mill was established in 1903 in the area where the Bayshore Mall is located today. During the 1930s a rail line was connected to the main railroad such that it bisected the southwestern corner of PALCO Marsh. A fill berm associated with the railroad siding borders the western portion of the marsh today. Lumber drying sheds were built between 1958 and 1959 on what is known as the Polished Property or Parcel 3 west of Maurer Marsh and north of the current mall parking area. Pacific Lumber Company (PALCO) purchased the mill parcels in 1959 and used the area for the drying and storage of lumber until 1983.

V a) Less than Significant with Mitigation Incorporated. The former Holmes-Eureka Lumber Company (later referred to as PALCO when it sold in 1958) occupied a large part of the Eureka waterfront from Del Norte Street south to Truesdale Street and from the Humboldt Bay coastline east to what is now US 101. The HRER (JRP Historical Consulting LLC 2014) concluded that the PALCO site, which includes the proposed Phase A trail alignment, does not appear eligible for listing in the National Register of Historic Places (NRHP), the California Register of Historic Resources (CRHR), or would be an eligible property for listing on the City of Eureka Local Register of Historic Places. The historic mill site would not be considered a historical resource for the purposes of CEQA (JRP Historical Consulting LLC 2014).

The historic Bucksport town site (circa 1850-1870), which includes the Historic Wiyot Community, was located near the south end of the proposed trail alignment. The Bucksport community boundary extends approximately 100 yards north of Truesdale Street, encompassing the last 0.1 mile of the proposed trail where it passes by the Chevron Terminal and residential development on its route south to Truesdale Street. The ASR concluded that application and enforcement of standard avoidance conditions and designation of an Environmentally Sensitive Area (ESA) action plan for historic and prehistoric properties would protect this resource (due to the confidential nature, specifics of the ESA Action Plan cannot be disclosed in this CEQA document). Implementation of *Mitigation Measure CUL-1 – Cultural Resources*, which requires stoppage of construction activities within the immediate area and a 50-foot buffer of a discovered resource and subsequent evaluation and development of an avoidance or mitigation plan prior to reinitiating of construction activities in the immediate area and a 50-foot buffer area, will reduce potential impacts on historic resources to a less-than-significant level.

V b) Less than Significant with Mitigation Incorporated. The project area lies within the traditional territory of the Wiki division of the Wiyot Indian tribe. Wiyot once occupied the lands adjacent to Humboldt Bay. Record searches, archival research, and oral history interviews contributed to defining locations considered highly sensitive for significant archaeological deposits within the archaeological area of potential effect defined for the proposed Phase A trail alignment. The proposed trail alignment and vicinity has experienced significant ground disturbance throughout the past. However, given ethnographic evidence of Native American habitations along Humboldt Bay, there is the potential for archaeological cultural resources to be present below the ground surface within the project area. As the project is currently proposed, trail construction would not exceed 6-inches depth. If, during the final design phase, it is determined that excavation activities must exceed 12 inches (e.g., trail bollards, signs, fencing) near known cultural resource sites (i.e., Historic Bucksport Townsite,

Historic Wyot Community at Bucksport, and CA-HUM-857 H – Historic Eureka City Dump), then archaeological monitoring during construction shall be required, as described in *Mitigation Measure CUL-3 – Archaeological Monitoring*. *Mitigation Measure CUL-1 – Cultural Resources* and *Mitigation Measure CUL-2 – Human Remains* will also be limited. These measures, which require stoppage of construction activities within the immediate area and a 50-foot buffer of a discovered resource and subsequent evaluation and development of an avoidance or mitigation plan prior to reinitiating of construction activities in the immediate area and a 50-foot buffer area and stoppage of work in the event of human remains are discovered and follow up notification to the County Coroner, NAHC, and identified most likely descendent (MLD), and requested (from the MDL) treatment of the remains, respectively, will reduce this impact to a less than significant level.

V c) No Impact. The project area and vicinity is not known to support any unique paleontological resources or unique geologic features.

V d) Less than Significant with Mitigation Incorporated. Although the project's area of potential effect (APE) is not known to contain any known burial sites or human remains, there may be unknown archaeological resources within the APE that could be unearthed during construction of the proposed trail. However, the likelihood of an inadvertent discovery of human remains in the portions of the proposed project that would be excavated is very low. The affected areas are comprised of non-native fill material that was historically used along much of the Eureka waterfront to stabilize the land so that it could be developed for industrial uses. If undiscovered archaeological, historical, ethnic, or religious resources are encountered during grading or construction activities, *Mitigation Measure CUL-2 – Human Remains* will be implemented. This measure, which includes stoppage of work in the event of human remains are discovered and follow up notification to the County Coroner, NAHC, and identified MLD, and requested (from the MDL) treatment of the remains, will mitigate the impact to a less than significant level.

FINDINGS: With implementation of the ESA Action Plan and the incorporation of mitigation, the proposed project would have a less than significant adverse impact on cultural resources (historic and prehistoric).

MITIGATION MEASURES

Mitigation Measure CUL-1 – Cultural Resources: If archaeological resources are encountered during construction activities, all onsite work shall cease in the immediate area and within a 50 foot buffer of the discovery location. A qualified archaeologist will be retained to evaluate and assess the significance of the discovery, and develop and implement an avoidance or mitigation plan, as appropriate. For discoveries known or likely to be associated with native American heritage (prehistoric sites and select historic period sites), the Tribal Historic Preservation Officers for the Bear River Band of Rohnerville Rancheria, Blue Lake Rancheria, and Wiyot Tribe will be contacted immediately to evaluate the discovery and, in consultation with the project proponent, City of Eureka, and consulting archaeologist, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or faunal remains, and human burials. Historic archaeological discoveries may include 19th century building foundations; structural remains; or concentrations of artifacts made of glass, ceramic, metal or other materials found in buried pits, old wells or privies.

Timing/Implementation: During construction
Enforcement: Native American Heritage Commission (NAHC) and City Parks & Recreation Department; Caltrans
Monitoring: City and/or its contractor
Evidence of Compliance: Completion of and adherence to required documents and measures.

Mitigation Measure CUL-2 – Human Remains: In the event that human remains are discovered during construction, the project proponent would be required to comply with the State Health and Safety Code 7050.5, which prohibits further disturbance until the County Coroner has made a determination of the origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified immediately of the find, and has two working days to examine human remains after being notified. If the remains are determined to be Native American, the coroner is required to notify the Native American Heritage Commission (NAHC) within 24 hours. The NAHC will identify and notify a Most Likely Descendant (MLD). With the permission of the owner of the land or his/her authorized representative, the descendant may inspect the site of the discovery. The descendant shall complete the inspection within 48 hours of being granted access to the site and may recommend means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The MLD’s preferences for treatment may include the nondestructive removal and analysis of human remains and items associated with the Native American human remains, their preservation in place, their relinquishment to the MLDs for treatment, or other culturally appropriate treatment.

Timing/Implementation: During construction
Enforcement: NAHC and City Parks & Recreation Department; Caltrans
Monitoring: City and/or its contractor
Evidence of Compliance: Completion of and adherence to required documents and measures.

Mitigation Measure CUL-3 – Archaeological Monitoring: If ground disturbance exceeds a depth of 12 inches near known cultural resource sites (i.e., Historic Bucksport Townsite, Historic Wiyot Community at Bucksport, and CA-HUM-857 H – Historic Eureka City Dump), then the City shall retain a qualified archaeologist and Native American monitors, if requested by the Wiyot Tribe/Table Bluff Reservation, Bear River Band of Rohnerville Rancheria or Blue Lake Rancheria, to monitor daily construction activities near these sites. Daily monitoring reports will be submitted to Caltrans District 1. In the event of unanticipated discovery, then *Mitigation Measure CUL-1* and/or *CUL-2* shall be implemented.

Timing/Implementation: During construction
Enforcement: City Parks & Recreation Department; Caltrans
Monitoring: City and/or its contractor
Evidence of Compliance: Completion of and adherence to required documents and measures.

| VI. GEOLOGY AND SOILS. Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-----------|
| a) Expose people or structures to 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. | | | ✓ | |
| ii) Strong seismic ground shaking? | | | ✓ | |
| iii) Seismic-related ground failure, including liquefaction? | | | ✓ | |
| iv) Landslides? | | | | ✓ |
| b) Result in substantial soil erosion or the loss of topsoil? | | ✓ | | |
| 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? | | | ✓ | |
| d) Be located on expansive soil, as defined by the California Building Code (2007), creating substantial risks to life or property? | | | | ✓ |
| 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? | | | | ✓ |

THRESHOLDS OF SIGNIFICANCE: This Initial Study considers project-related effects that could involve or result from: (a) damage to project elements as a direct result of fault movement along a fault identified in the Alquist-Priolo study or other known fault; (b) damage to project elements as a direct or indirect effect of seismically derived ground movement; (c) damage to project elements because of landslides that are not seismically related; (d) project-derived erosion by water or wind of more than a minimal volume of earth materials; (e) project-derived or project-caused secondary instability of earth materials that could subsequently fail, damaging project elements or other sites or structures; (f) location of project elements on expansive soils that are identified by professional geologists, which could result in damage to project elements or other sites or structures.

DISCUSSION

Eureka lies within the northern portion of the Coast Range geomorphic province, a dynamic region of California subject to complex folding and faulting from tectonic activity within the Cascadia Subduction Zone (Lawrence and Associates 2014). However, the proposed trail alignment does not occur on any fault zones and the Alquist-Priolo Earthquake Fault Zone has not been mapped in the city of Eureka (California Department of Conservation 2014b). The closest fault is the North Spit Fault (Elk River Segment) that runs northwest to southeast approximately 0.5 mile south of Truesdale Street (Kilbourne et al. 1980).

In the proposed project area of the Eureka Plain watershed, two main rock types that dominate the local geology include the older and more sedimentary rocks of the Yager Formation and the geologically younger rocks of the Wildcat Group. Younger sedimentary rock is more predominant than the older sedimentary rock. The Yager Formation is relative to a hard foundation upon which a mantle of softer younger rocks from the Wildcat Group overlies. Yager rocks are well cemented and resistant to erosion while the Wildcat rocks are very soft, weakly cemented, and very susceptible to erosion.

VI a) Less-than-Significant Impact. The project would not include construction of any features that would likely present a hazard in the event of a seismic incident. Furthermore, all constructed features would comply with the 2007 California Building Code (CBC), including the requirements of the special Seismic Design Category zones (SDC). Considering the distance from known faults to the project, lack of constructed features that impose a risk in a seismic event, and CBC and SDC requirements, potential impacts resulting from fault rupture such as seismic ground failure is considered to be less than significant.

The project is within an area of historical fill over bay muds and may be subject to some degree of ground liquefaction during strong seismic shaking. However, the trail alignment is mapped within an area of “Relative Stability” by the County (Humboldt County Planning Department 2014) and the project will comply with CBC’s seismic requirements. Since the proposed project area and vicinity are flat, there is no potential for landslides.

VI b) Less than Significant with Mitigation Incorporated. Minor site grading would be performed in compliance with the BMPs prescribed in the Eureka Municipal Code, the North Coast RWQCB regulations, and the Uniform Building Code. In areas where the trail would be located in close proximity to designated ESHA, BMPs will be implemented to prevent erosion and sedimentation from trail improvement construction. Protection measures include a SWPPP that would be required prior to any grading or construction activities in excess of one acre. *Mitigation Measure BIO-3 –*

Erosion and Sedimentation Control, which includes the development and implementation of a site-specific pollution prevention plan and SWPPP, will be used to minimize potential soil erosion. No substantial soil erosion or loss of topsoil would result from the project and with mitigation incorporated, the impact would be less than significant.

VI c) Less-than-Significant Impact. The project area is on predominately flat ground with no potential for landslides. The project is within an area of historical fill over bay muds and may be subject to some degree of ground liquefaction during strong seismic shaking. The trail alignment is mapped by the County as being within an area of Relative Stability (Humboldt County Planning Department 2014). The project will comply with CBC seismic requirements. This impact would be less than significant.

VI d) No Impact. The project is not located on expansive soils and, therefore no related significant risk to life or property is anticipated.

VI e) No Impact. The proposed project does not include septic tanks or other alternative wastewater disposal systems, and no impact related to wastewater disposal in soils would result. The project area is served by existing municipal wastewater disposal infrastructure. No significant impacts are anticipated.

FINDINGS: Based on the above discussion, staff concludes that the project would have less than significant impacts on geology and soils.

MITIGATION MEASURES

Implement *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* to prevent degradation of water quality and loss of soil due to erosion.

| VII. GREEN HOUSE 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, either directly or indirectly, that may have a significant impact on the environment? | | | ✓ | |
| b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases? | | | ✓ | |

THRESHOLDS OF SIGNIFICANCE: This Initial Study considers to what degree the project would contribute to greenhouse gas emissions and global warming.

DISCUSSION

The Earth’s atmosphere is composed of a number of gases that act like the glass panes of a greenhouse, retaining heat to keep the temperature of the Earth stable and hospitable for life. The following are greenhouse gases (GHG’s) which are known to trap heat: water vapor, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydro fluorocarbons, per fluorocarbons, and sulfur hexafluoride. Elevated concentrations of the GHG’s in the atmosphere have had a de-stabilizing effect on the global climate and are considered pollutants. Of these gases, CO₂, CH₄, N₂O are the primary GHG pollutants of concern and are emitted in the greatest quantities from human activities. Emissions of CO₂ are largely by-products of fossil fuel combustion, whereas CH₄ results from off-gassing associated with agricultural practices and landfills. Considering GHG’s have long-term impacts and reside in our atmosphere for long periods of time, one project alone cannot be the cause of global climate change, but can be an incremental contributor in the long term.

Sea Level Rise. The California Coastal Commission has produced sea level rise estimates in the 2013 Draft Sea-Level Rise Policy Guidance (California Coastal Commission, 2013). This document indicates that the sea level on the coast of California, north of Cape Mendocino, may rise between 9 inches and 56.28 inches between the base year of 2000 to 2100, as projected by the National Research Council, which significantly exceeds previous estimates. Sea-level rise in the vicinity of Humboldt Bay and Eel River estuary is further exacerbated by vertical land motion (e.g., large-scale uplift and subsidence). It should be noted that sea level rise predictions are based on mathematical models in a rapidly evolving field of study, and that actual sea level rise may be significantly different than current predictions.

VII a) Less-than-Significant Impact. Some amount of GHG emissions would result from motor vehicle trips and construction operations on the trail. Conversely, it can be reasonably expected that non-motorized use of the trail may correlate to a small decrease in vehicle miles traveled in the region and a related decrease in GHG emission. However, it is not anticipated that the trail would have an individually discernible effect on global climate change, and therefore its effect on the environment would be less than significant.

VII b) Less-than-Significant Impact. The proposed project is in a relatively low-lying waterfront area of the city, a portion of which is in the mapped 100-year floodplain. If the current sea level rise predictions materialize, the proposed trail may be exposed to an increased level of periodic inundation as a result of high tide and flood events. The proposed trail, however, is not expected to be subject to significant damage as a result of such inundation and is not an essential facility required to be operational in the event of a flood.

Neither the North Coast Unified AQMD nor the County has adopted any thresholds of significance in determining project-related GHG impacts (North Coast Unified Air Quality Management District 2014). The City does not yet have a Climate Action Plan. The proposed project does not conflict with any applicable plan, policy, or regulations related to reducing GHG emissions and, therefore a less-than-significant impact is expected.

FINDINGS: Based on the discussion above, the project would not significantly impact GHG emissions or conflict with regulations related to the reduction of GHG emissions.

MITIGATION MEASURES

No project-specific mitigation is required under this subject.

| VIII. 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? | | ✓ | | |
| 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? | | ✓ | | |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-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? | | | ✓ | |
| 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 for people residing or working in the project area? | | | ✓ | |
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | | | ✓ | |
| g) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan? | | ✓ | | |
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized area or where residences are intermixed with wildlands? | | ✓ | | |
| <u>THRESHOLDS OF SIGNIFICANCE:</u> This Initial Study considers to what degree the proposed project would involve: (a) potential storage or use, on a regular basis, of chemicals that could be | | | | |

hazardous if released into the environment; (b) operating conditions that would be likely to result in the generation and release of hazardous materials; (c) use of hazardous materials, because of construction-related activities or operations, within a quarter-mile of an existing or proposed school; (d) project-related increase in use intensity by people within the boundaries of, or within two miles of, the Airport Planning Areas; (e) project-derived physical changes that would interfere with emergency responses or evacuations; or (f) potential major damage because of wildfire.

DISCUSSION

The following discussion is based on the findings of the Phase I Environmental Site Assessment, Waterfront Trail Project – Phase A, Del Norte Street to Truesdale Street, Eureka, California (Lawrence and Associates 2014).

VIII a) Less than Significant with Mitigation Incorporated. Project construction and operation would not routinely generate any hazardous materials. Although construction would not generate any hazardous materials, a potential hazard to the public and the environment would be posed by the accidental spill of diesel or gasoline used to power construction equipment (trucks, excavators, etc.) or lubricants such as oil and hydraulic fluids. The potential for an accidental spill of pollutants would be temporary and mitigable since equipment would be routinely maintained and inspected to avoid leaks, and is similar to vehicles operating on nearby roads, as described in a site-specific spill prevention plan. Best management practices described in *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants* will be used to reduce potential impacts on vegetation and aquatic habitat resources associated with an accidental spill of pollutants within the project area. In the event of an accidental spill, implementation of this measure will reduce the potential hazard to the public and the environment to a less-than-significant level by ensuring that construction equipment are equipped with emergency spill kits for rapid containment and cleanup. Project operation would not involve the use or storage of any hazardous materials.

VIII b) Less than Significant with Mitigation Incorporated. No hazardous materials are currently stored, or proposed for use or storage within the project area. The proposed trail alignment would follow an existing railroad ROW and access roads through a former industrial area. The Phase 1 Site Assessment (Lawrence and Associates 2014) prepared for the proposed project identified three recognized environmental conditions (RECs) within the proposed project area.

- **REC-1** - A majority of the project area was used as railroad. Commonly, fuels, oils, and hazardous materials may have been transported, used, stored, and/or discharged to the ground along the tracks. Because of the historic use, there is a possibility that residual fuels and/or oils and hazardous materials remain in the subsurface along the tracks. Historically contaminated soils may be encountered where construction of the proposed trail is located within less than 15 feet of the centerline of the existing tracks and the trail foundation is excavated below existing grade.
- **REC-2** - Information reviewed for the adjacent Chevron USA Marine Terminal site revealed evidence that petroleum products have historically impacted soils and groundwater of the Chevron site and the soils and groundwater within the railroad ROW east of the Chevron facility. There is a possibility that residual fuels and/or oils and hazardous materials reside in the shallow subsurface along the railroad ROW based on the documented shallow soil and

groundwater contamination reported for the site. Future trail foundation construction could encounter contaminated soils if excavated below existing grade.

- **REC-3** - Lead from motor-vehicles may be present in low concentrations in the soils of the proposed trail where the trail alignment is within 15 feet of the city streets ROW (i.e., Del Norte, Truesdale. Lead associated with the Chevron site could also be present within the alignment adjacent to Chevron. However, the likelihood of lead contamination in shallow soils from the Chevron site is very low, based on previous soil and groundwater samples from the Chevron facility.

The potential for these RECs to pose a significant hazard to humans or the environment would depend upon the scope of the construction phase of the project; however, based on the proposed construction methodology, it is unlikely the RECs would have the potential to have an impact during construction of the project as long as the method for construction does not disturb identified or previously unidentified environmental concerns. There is evidence to indicate that contaminated soils or hazardous materials are present in the vicinity, but not in close proximity, along the proposed trail alignment. However, as stated below in *Mitigation Measure HAZ-1 – Soil Testing*, during project implementation, if there is any evidence that indicates contaminated soil or hazardous materials are present on the site, either from visual observations or odors indicative of regulated substances, the City shall be responsible for performing soil sample analyses. Based on the results of the analysis, the City shall consult with jurisdictional agencies regarding follow-up procedures. The City shall comply with all requirements/regulations of the appropriate agencies with regard to handling, transport and disposal of potential hazardous substances to the satisfaction of the applicable agency. In addition, best management practices described in a site-specific pollution prevention plan to be prepared as part of *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants* will also be used to reduce potential impacts that could result from disturbance of the RECs within the project area to a less-than-significant level.

VIII c) No Impact. The nearest schools are within the city approximately 0.5 miles east of the project alignment. The project would not pose a hazard to a school.

VIII d) Less-than-Significant Impact. An exhaustive review of federal and state environmental databases, including the State Department of Toxic Substances Control (DTSC) EnviroStar database (California Department of Toxic Substances Control 2014); the State Regional Water Quality Control Board's GeoTracker database (State Water Resources Control Board 2014); and the Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) was conducted as part of the Phase 1 Site Assessment study (Lawrence and Associates 2014). Other sources researched for known contaminants within the proposed project area included Sanborn (fire insurance maps) for the years 1920 to 1988; historical land use aerial photograph interpretation for years between 1931 and 2012; personal interviews with property owners and City officials; and site reconnaissance (Lawrence and Associates 2014). The project area is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and no significant hazards to humans or the environment were identified.

A list of vicinity properties having a recorded contamination, regulated landfill, underground storage tank, or that generate hazardous waste, is included in the Phase 1 Site Assessment Report. Of the listed properties, only the Chevron Terminal would have the potential to affect trail users. The Chevron facility has associated groundwater monitoring wells that are within proximity to the proposed trail

alignment. Regular monitoring of these wells would detect an increase in any potential contaminants in the groundwater and Chevron would be responsible for implementing any remediation measures required by the North Coast RWQCB. This will help to protect the public from accidental exposure to soil contaminants along the trail near the Chevron Terminal. It does not appear that, based on physical locations, the other nearby listed sites listed are near enough to the proposed project area that the migration of contaminants would be a concern (Lawrence and Associates 2014).

VIII e, f) Less-than-Significant Impact. The project site is approximately 1.3 miles northeast of the Eureka Municipal Samoa Field and approximately 2.5 miles southwest of the Murray Field Airport. The project is not close enough to either airport to pose a significant risk to the public. Therefore, the project would have a less-than-significant impact on airport safety.

VIII g) Less than Significant with Mitigation Incorporated. The project area is located in close proximity to Humboldt Bay and is within the designated Tsunami Evacuation Area, which includes all areas north of 2nd Street and west of Broadway in Eureka (Humboldt County Planning Department 2014). The site is mapped as being within high, moderate, and low hazard inundation areas (Humboldt State University 2004). In the event of a tsunami warning, the City of Eureka Emergency Operations would broadcast an emergency tsunami warning and provide direction to the public on the actions they should take in the event of a potential tsunami in Humboldt Bay. To help inform trail users of tsunami hazards and evacuation procedures, the proposed project would include signage to notify the public of tsunami hazards and evacuation routes. Because there are existing tsunami evacuation plans for the area and the project would include the addition of tsunami hazard signage, the project would not interfere with any existing emergency response plans. *Mitigation Measure HAZ-2 – Tsunami*, which includes the installation of signage warning the public of tsunami dangers and what actions to take in the event of seismic activity, will be used to reduce the hazards associated with tsunamis to a less-than-significant level.

VIII h) Less than Significant with Mitigation Incorporated. The project area is located within the Eureka city limits. Although there are no wildlands in the project vicinity, the proposed trail would be aligned through densely vegetated areas, particularly Parcel 4. Parcel 4 has a history of fire incidences associated with transient activity (Lawrence and Associates 2014). Limiting use of the proposed trail to non-motorized use would minimize the potential for fires in the area and may actually reduce transient activity and associated fire danger in the area. The use of construction equipment in and around vegetated areas increases the potential for wildfire ignition. *Mitigation Measure HAZ-3 – Wildland Fire*, which includes provisions in the construction bid documents that all internal combustion engines on construction equipment shall be equipped with an operational spark arrestor, will be used to reduce the risk of wildfire associated with project construction to a less-than-significant level.

FINDINGS: With the incorporation of mitigation, the proposed project would have a less than significant adverse impact associated with hazards and release of hazardous materials.

MITIGATION MEASURES

Implement *Mitigation Measure BIO-1 – Prevention of Accidental Spills of Pollutants* to prevent degradation of water quality and protect vegetation and aquatic habitat resources from pollutants.

Mitigation Measure Haz-1- Soil Testing: In the event any hazardous, toxic, noxious, objectionable, or unknown chemicals are encountered during trail construction, construction shall be halted by the construction crew on duty and reported to the general contractor for the project, and to the City. Prior to resuming any work the City shall be responsible for obtaining a soil sample contamination analysis. The findings of the analysis shall be submitted, as applicable, to the North Coast RWQCB and any other appropriate regulatory agencies. Work shall not continue until and unless written approval is obtained from these agencies. The applicant shall comply at all times with the requirements and regulations of the RWQCB and other appropriate regulatory agencies with regard to the handling, transport, and disposal of hazardous materials such as contaminated soils to the satisfaction of these agencies. Disposal of all hazardous materials will be in compliance with all applicable California hazardous waste disposal laws.

Timing/Implementation: During design and construction.
Enforcement: City Parks & Recreation Department. North Coast RWQCB, Caltrans
Monitoring: City and/or its contractor
Evidence of Compliance: Adherence to applicable regulations if hazardous materials are encountered.

Mitigation Measure Haz-2 - Tsunami: To inform the general public of the potential of tsunami run-up inundating the trail area, and to provide information regarding associated safety measures, each trailhead location shall have signage informing the public of tsunami dangers and providing information regarding what actions to take in the event of seismic activity. Said signage shall be posted to the satisfaction of the City and prior to the trail being open to the general public.

Timing/Implementation: Prior to, during, and after construction
Enforcement: City Parks & Recreation Department
Monitoring: City and/or its contractor
Evidence of Compliance: City of Eureka official will inspect and approve.

Mitigation Measure HAZ-3 – Wildland Fire: The City shall include provisions in the construction bid documents to minimize the potential for ignition of wildfire as a result of project construction. Per the requirements of Public Resources Code 4442 and to reduce construction-related wildfire ignition potential, the City shall include a note on all construction plans that internal combustion engines shall be equipped with an operational spark arrester, or the engine must be equipped for the prevention of fire.

Timing/Implementation: Prior to and during construction
Enforcement: City Parks & Recreation Department
Monitoring: City and/or its contractor
Evidence of Compliance: Adherence to applicable regulations

| IX. 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? | | | ✓ | |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | | | | ✓ |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site? | | | ✓ | |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | | | ✓ | |
| e) 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? | | | ✓ | |
| f) Otherwise substantially degrade water quality? | | ✓ | | |
| g) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary of Flood Insurance Rate Map or other flood hazard delineation map? | | | | ✓ |
| h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows? | | | ✓ | |

| | | | | |
|--|--|---|---|--|
| i) Expose people or structures to a significant risk or loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | | | ✓ | |
| j) Result in inundation by seiche, tsunami, or mudflow? | | ✓ | | |

THRESHOLDS OF SIGNIFICANCE: This Initial Study considers to what degree the proposed project would involve: (a) improvements that would violate standards set for water quality and for discharge of waste water; (b) use of, or interference with ground water such that the amount of flow of groundwater is adversely impacted; (c) drainage improvements that would alter or cause an increase in amount or flow of drainage, or that would affect the free-flow of a stream or river or cause an increase in silt runoff as to cause adverse impact; (d) added runoff from the site that would exceed the capacity of drainage facilities; (e) the creation of polluted runoff or other general adverse water quality impacts; (f) the placement of housing or other structures within the 100-year flood plain, or other area subject to flooding; or (g) development in such a manner or location that it would be adversely affected by seiche, tsunami or mudflow.

Hydrology: Humboldt Bay is the second largest marine embayment in California. It is part of the Eureka Plain watershed and the Mad-Redwood Basin. The Eureka Plain watershed spans 223 square miles within the county and of this, the Bay covers approximately 25.5 square miles. The headwaters of the Bay’s tributaries originate in nearby coastal mountains, which separate the watershed from the Eel River watershed to the south and the Mad River watershed to the north. In general, the hydraulic basins in the County, including the Mad-Redwood Basin, provide large surface water volumes (30 percent of the runoff in the entire State of California), 80 percent of which is deposited between November and March. The Bay’s smaller tributaries drain a total of approximately 35 square miles of the watershed.

Runoff from several watersheds, including the Eureka Plain, influences the local hydrology within the Bay. A combination of factors, such as local geology, topography, drainage area, and rainfall patterns, determine the volume of river runoff into the Bay. Streamflow in the Eureka Plain watershed peaks in the winter (November through March) and is lowest during the summer. The Eureka Plain watershed consists of both tidal marshes and stream floodplain that surrounds the Bay’s edge. The four major streams of the Eureka Plain, which drain into the Bay, are Jacoby Creek (draining 17 square miles), Freshwater Creek (31 square miles), Elk River (29 square miles), and Salmon Creek (17 square miles). Jacoby and Freshwater Creeks drain into Arcata Bay to the north, Elk River drains into Entrance Bay near Eureka, and Salmon Creek drains into South Bay. Smaller streams flow primarily into the North Bay.

Water Quality: The project is located within the jurisdiction of the *Water Quality Control Plan for the North Coast Region* (Basin Plan), as adopted by the North Coast RWQCB. The Basin Plan for the North Coast Region includes all the land area that drains into the Klamath River and North Coastal basins. The following beneficial uses are designated within the North Coast Region:

- Municipal and Domestic Supply
- Agricultural Supply
- Industry Service Supply
- Recreation-1 – Water Contact
- Freshwater Replenishment
- Estuarine Habitat
- Marine Habitat
- Wildlife Habitat

- Recreation-2 – Non-contact Water
- Commercial and Sport Fishing
- Aquaculture
- Freshwater Habitat – Cold-water
- Shellfish Harvesting
- Migration of aquatic organisms
- Rare, Threatened, or Endangered Species
- Spawning, Reproduction, and/or Early Development
- Navigation
- Commercial and Sport Fishing

In addition to the existing beneficial uses according the Basin Plan, there are potential beneficial uses. These include industrial process supply and hydropower generation.

Nutrient levels, salinity, temperature, and dissolved oxygen levels are primary factors that cause extreme variability in Humboldt Bay's water quality. Major water quality concerns in the watershed include sedimentation and bacteria-laden runoff, which originate from point and non-point sources. Actual and potential sources of pollution include runoff from pasturelands and rangelands, discharges of treated wastewater by the cities of Eureka and Arcata, exhausts from recreational boats, and accidental discharges of pollutants from ships, commercial boats and recreational boats. The influx of turbid ocean water into the bay, erosion, and sediment transport from disturbed uplands accelerate suspended sediment deposition and turbidity levels.

DISCUSSION:

IX a) Less-than-Significant Impact. Construction and operation of the project would not violate any water quality standards or waste discharge requirements set forth by the North Coast RWQCB in its Water Quality Control Plan for the North Coast region (North Coast Regional Water Quality Control Board 2011). The trail would follow the alignment of existing rails and roads, and the NCRA railroad corridor. Minor grading necessary to construct the trail would be conducted specific to the project design and the potential for project actions to impact water quality would be low. Water pollution control measures have been incorporated into the project design and are required according to current Caltrans Standard Specifications (Section 7-1.01G). Additionally, project activities would comply with the requirements set forth in a 401 Water Quality Certification, which is required by the North Coast RWQCB prior to project implementation.

The project would also be constructed in accordance with BMPs described in the Eureka Municipal Code (City of Eureka 2014), Uniform Building Code (International Code Council 1997), California Stormwater Quality Association Municipal BMP Handbook (California Stormwater Quality Association 2004) and the regulations of the North Coast RWQCB. Impacts on water quality standards would be less than significant.

IX b) No Impact. Construction and operation of the project would have no effect on groundwater supplies. There would be no net change in local aquifers or the local groundwater table as a result of the project since the proposed trail would be aligned within existing roads, trails, and railroad corridor and will not require drawing water from or injecting water into the local groundwater aquifer. The proposed project is not water dependent.

IX c, d) Less-than-Significant Impact. Construction activities associated with the project are not anticipated to significantly alter the existing drainage pattern of the site or area in a way that would result in erosion or sedimentation. Minor changes to drainage patterns could result from limited

realignment, extension, or replacement of low volume culverts, and other minor stormwater infrastructure device alterations to better accommodate the trail. Assuming a worst-case scenario of a 1.2-mile (6,312-foot) by 10-foot new trail (Note: the trail width will be reduced to 8 feet in several areas to protect ESHAs), up to 63,120 square feet of new impervious surface will be constructed. The City's current NPDES stormwater permit requires that development on any specific parcel that increases impervious surface by greater than 2,500 square feet must implement low impact development (LID) measures that retain and treat the runoff from the 85% storm event. Since the proposed project is likely to exceed 2,500 square feet on most parcels, LID measures will need to be implemented. For those impacted parcels, LID measures are in place as the impervious porous materials (gravel shoulders and undeveloped ground surfaces) and landscaping located adjacent to the proposed trail will adequately retain and treat all runoff at a level higher than the 85% storm event, without the need to construct retention/siltation basins. Therefore the proposed project will not substantially increase the rate or amount of surface water runoff in a manner that would result in on-site or off-site flooding and the project impact would be less than significant.

IX e) Less-than-Significant Impact. The proposed project would not significantly alter the current pattern of drainage or result in excessive erosion or siltation on or offsite of the project area boundaries. The existing substrate is predominantly compacted imported fill associated with the railroad grade. Although the project would add up to 63,120 square feet of new impervious surface, the change in the volume and path of runoff will be adequately handled by the LID measures described above in IX c, d. Any water falling on the paved trail would simply flow to surrounding, impervious areas (e.g., two-foot gravel shoulders and undeveloped ground surfaces) where sufficient percolation would occur. In addition, native vegetation will be incorporated into the trail design, which will reduce stormwater runoff and act as a biofilter to treat runoff from the paved trail. Project implementation is, therefore, expected to have a less-than-significant impact on the capacity of stormwater drainage systems that would affect flood capacity or result in a net increase of surface runoff, or be a source of pollution that would substantially degrade water quality.

IX f) Less than Significant With Mitigation Incorporated. In areas where the trail would be located in close proximity to designated ESHA, *Mitigation Measure BIO-3 – Erosion and Sediment Controls* will be used to prevent erosion and sedimentation from trail improvement construction by developing and implementing a site-specific SWPPP that will prevent sediment transport into adjacent surface waters. No other water quality impacts beyond what are described above (IX a-e) would occur as a result of project implementation. This impact would be less than significant with incorporation of mitigation.

IX g) No Impact. The project does not include the construction of new housing within a 100-year flood hazard area.

IX h) Less-than-Significant Impact. Based on review of the Flood Insurance Rate Map prepared by the Federal Emergency Management Agency, a segment of the proposed project area on the west side of the railroad tracks beginning at Del Norte Street is within Zone A1 (Areas of 100-year flood; base flood elevations and flood hazard factors determined) (*Flood Insurance Rate Map, Map Number 060062 0005C*) (Federal Emergency Management Agency 1986). The portion of proposed project area within the mapped floodplain generally corresponds to the segment of trail that passes along the west side of PALCO Marsh. The remainder of the proposed project area is within Zone C (Areas of minimal flooding), including the portion of the proposed Phase A trail that would be located on existing fill material (e.g., NCRA railroad bed), which is elevated above the existing 100-year

floodplain. The project is not anticipated to substantively impede or redirect flood flows beyond the existing site conditions because it does not include any substantive above-ground elements. Therefore, the project impact on the 100-year floodplain would be less than significant.

IX i) Less-than-Significant Impact. The proposed trail would be located on existing fill materials associated primarily with the NCRA railroad corridor, which it assumed was originally designed to be located above a flood zone that would expose people or the railroad to significant risk or loss. The existing stormwater drainage system (culverts) in the project area would be modified to accommodate the potential for the anticipated minor increase in stormwater runoff. The project is not in close proximity to any dam or levee that has the potential to expose people or structures to a significant risk or loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

IX j) Less than Significant with Mitigation Incorporated. Due to the known seismic activity in the Pacific Rim, there is real potential for a tsunami to occur that could impact Humboldt Bay. It is expected that the impact of a tsunami on Humboldt Bay would primarily occur along the north and south spits and the King Salmon and Fields Landing areas, which are located directly across from the opening to Humboldt Bay.

Configuration of the coastline, shape of the ocean floor, and character of the advancing waves play an important role in the destruction wrought by tsunamis along any coast, whether near the generating area or thousands of kilometers from it. The project area is located in close proximity to Humboldt Bay and, together with all areas north of 2nd Street and west of Broadway in Eureka, is within the designated Tsunami Evacuation Area. The project area is also within high, moderate, and low hazard inundation areas of the Tsunami Hazards Map (Humboldt State University 2004). The City of Eureka along with FEMA, NOAA, and the State of California, has developed emergency response procedures incorporated into the City's emergency response plans. The United States has collaborated with other countries around the Pacific to build and maintain a warning system that detects earthquake, sea surface levels, and ocean-bottom movements of water. The Pacific Tsunami Warning Center in Ewa Beach, Hawaii, is staffed full-time by scientists, who quickly collect and analyze incoming data and decide whether to issue a tsunami warning. In the event of a tsunami warning, the City of Eureka Emergency Operations employees are trained in disaster preparedness including broadcasting an emergency tsunami warning and giving direction to the public on the actions they should take in the event of a potential tsunami in Humboldt Bay.

While the project would result in the placement of facilities that would locate the public within a tsunami run-up zone, this is a distant threat and technology currently in place will help the city respond in a timely and appropriate manner. Further, the project is not proposing structures that would be concentrating large numbers of people for an extended amount of time within a confined area (e.g., commercial buildings); instead, the majority of the public using the new facilities would be moving through the area and would not be congregating in large numbers. *Mitigation Measure HAZ-2- Tsunami* which includes the installation of signage warning the public of tsunami dangers and what actions to take in the event of seismic activity, will be used to minimize potential risks associated with tsunami inundation.

FINDINGS: The project area is currently used for recreational activity, and planned improvements will not create significant additional risk. Based on the discussion above, and with the mitigation

measures described below, the project is expected to result in less than significant impacts to hydrology and water quality.

MITIGATION MEASURES

Implement *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* to minimize impacts on water quality.

Implement *Mitigation Measure HAZ-2 – Tsunami* to minimize impacts that could result from inundation caused by a tsunami.

| X. LAND USE AND PLANNING. Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-----------|
| a) Physically divide an established community? | | | | ✓ |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | | ✓ | | |
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan? | | | ✓ | |

THRESHOLDS OF SIGNIFICANCE: This Initial Study considers to what degree the proposed project would (a) divide an established community or conflict with existing land uses within the project’s vicinity, such as agriculture resources; (b) conflict with the Eureka General/Coastal Plans designation, policies, and zoning ordinances regarding commercial, public, and quasi-public facilities; or (c) conflict with applicable environmental plans and protection measures enforced by regulatory agencies that have jurisdiction over the project, such as habitat conservation plans or a natural community conservation plan.

DISCUSSION

X a) No Impact. The trail corridor is proposed along the Eureka waterfront of Humboldt Bay. The proposed project would not result in the physical division of an established community since the proposed trail alignment would utilize existing roads, trails, and rail corridors already developed within the city and extends along the edge of the Humboldt Bay coastline rather than through the city.

X b) Less-than-Significant Impact with Mitigation Incorporated. Zoning in the project area includes Coastal-Dependent Industrial (MC), Public (P), and Natural Resources (NR). The primary existing land uses in the project area include railroad ROW, developed and abandoned industrial and commercial lands, and passive recreational facilities. Land use designations in the project area include Coastal Dependent Industrial (CDI), Community Commercial (CC) and Natural Resources (NR). PALCO Marsh is a designated open space and natural area. “Public recreation facilities are principally permitted in the P zone district. “Access support facilities” are conditionally permitted in the MC zone district, and “pedestrian access consistent with all applicable policies of the land use plan” are conditionally permitted in the NR zone district. Therefore, the portions of the project located within land zoned MC and NR, and that are designated as CDI and NR in the General Plan, will require a conditional use permit (CUP) in order for the project to be in conformance with zoning and land use plans. Implementation of *Mitigation Measure LU-1 – Obtain Land Use Permits* will ensure that the

proposed project is consistent with the City's General Plan. Therefore, this impact will be less than significant with mitigation incorporated.

The project is within the Coastal Zone and would therefore be subject to applicable policies and regulations of the Coastal Act and the City of Eureka's Local Coastal Program related to public access and recreation, environmental resources, and visual resources. The proposed project improves public access to and along the Humboldt Bay shoreline by providing a developed public trail with amenities such as interpretive signage and benches, thereby providing a significant recreational opportunity. The trail will be designed to avoid impacts to sensitive environmental resources including plants and animals, wetland and other ESHA, and water quality, as discussed in applicable sections of this initial study. The project is designed to avoid visual impacts by minimizing vegetation removal and protecting nighttime views, and will actually improve visual qualities, as provided in the Aesthetics section of the initial study.

Since the project is located in the Coastal Zone and is considered to be "development" as defined in the Coastal Act and the City's LCP, a Coastal Development Permit will need to be obtained. Implementation of *Mitigation Measure LU-1 – Obtain Land Use Permits*, which requires that the City secure a Coastal Development Permit prior to construction, will ensure that the proposed project is consistent with the Local Coastal Program and Coastal Act and this impact would be less than significant. It is the City's intent to request a consolidated permit process for this project.

Construction of the project would be consistent with the City's Strategic Vision (City of Eureka 2011)—that identifies a long term direction, short term goals, and action steps for the city's growth—and the City of Eureka General Plan (City of Eureka 1999). The General Plan includes a pedestrian and recreation-related goal and policy that would be directly compatible with the project. Pertinent goals and policies include, but are not limited to:

- **Goal 3.C** – To encourage the use of the bicycle as an alternate, energy efficient mode of transportation within the city and to develop a system of bikeways and bicycle parking facilities which will safely and effectively serve those wishing to utilize the bicycles for commute or recreation.
- **Goal 5.B** – To provide open space and shoreline accessways throughout the Coastal Zone, consistent with protecting environmentally sensitive habitats and other coastal priority land uses.
 - **Policy 5.B.1** – The City shall provide public open space and shoreline access throughout the Coastal Zone, particularly along the waterfront and First Street through all of the following:
 - b. Establish a walkway system located on or near the shoreline throughout the city's waterfront Core Area.
 - c. Establish scenic vista points at numerous locations along the waterfront, including construction of a public access point at the foot of Truesdale Street.
 - **Policy 5.B.2** – On shoreline parcels where recreation or visitor-serving uses are integrated with coastal-dependent uses, the City shall ensure that the recreation or

visitor-serving uses are secondary to and compatible with the coastal dependent uses.

- **Policy 5.B.7** – The city shall establish a coordinated continuous public access system throughout its Coastal Zone, consisting of pedestrian walkways, nature walks, and bikeways with necessary support facilities.

X c) Less-than-Significant Impact. There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other similar plans that cover the project area. There is, however, an open space easement over the City's PALCO Marsh property held by the State Coastal Conservancy, and another over Parcel 4 held by the Redwood Region Audubon Society. Because the proposed trail alignment would be adjacent to, but outside of PALCO Marsh, the potential for direct impacts to this sensitive resource are avoided. Further, the proposed project, construction of a new trail system, is a consistent use within the open space easement as it provides improved public access to the Humboldt Bay shoreline.

FINDINGS: Based on the above discussion, the project will not divide the community and is expected to have a less than significant impact to land use and planning with implementation of *Mitigation Measure LU-1 – Obtain Land Use Permits*.

MITIGATION MEASURES

Mitigation Measure LU-1 – Obtain Land Use Permits: The City Parks & Recreation department shall apply for and obtain a Conditional Use Permit from the City Community Development Department for portions of the trail that intersect with lands zoned as MC and NR, and are designated as CDI and NR in the General Plan/LCP. In addition, they shall obtain a Coastal Development Permit from the California Coastal Commission for work proposed within the Coastal Zone.

| | |
|--------------------------------|-------------------------------------|
| Timing/Implementation: | Prior to construction |
| Enforcement: | City Parks & Recreation Department |
| Monitoring: | City; California Coastal Commission |
| Evidence of Compliance: | Issuance of CDP and CUP |

| XI. 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? | | | | ✓ |
| 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? | | | | ✓ |
| <p><u>THRESHOLDS OF SIGNIFICANCE:</u> This Initial Study considers to what degree the proposed project would interfere with the extraction of commodity materials or otherwise cause any short-term or long-term decrease in the availability of mineral resources that would otherwise be available for construction or other consumptive uses.</p> <p><u>DISCUSSION</u></p> <p>XI a, b) No Impact. No locally important mineral resource recovery sites are located within the project area. The project area has not been mapped by the State Division of Mines and Geology as containing marketable aggregate (California Geological Survey 2012). Gravel mining activities do not occur at this location. It is unlikely that the project site would be considered an important aggregate resource.</p> <p><u>FINDINGS:</u> The mineral resources needed for the trail improvements within the City would be of limited quantities and the project is expected to have no impact on local mineral resources.</p> <p><u>MITIGATION MEASURES</u></p> <p>No project-specific mitigation is required under this subject.</p> | | | | |

| XII. NOISE. Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-----------|
| a) Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | | ✓ | | |
| b) Expose persons to or generate excessive ground borne vibration or ground borne noise levels? | | | ✓ | |
| c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | | | ✓ | |
| d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | | ✓ | | |
| 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 expose people residing or working in the project area to excessive noise levels? | | | | ✓ |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | | | | ✓ |

THRESHOLDS OF SIGNIFICANCE: This Initial Study considers whether the proposed project would produce: (a) sound-pressure levels contrary to the City of Eureka noise standards; (b) long-term ground vibrations and low-frequency sound that would interfere with normal activities and which is not currently present in the project area; (c) a substantial increase in ambient short-term or long-term sound-pressure levels; (d) changes in noise levels that are related to operations, not construction-related, which will be perceived as increased ambient or background noise in the project area.

Noise is generally defined as excessive and unwanted sound emanating from noise-producing objects. Total environmental noise exerts a sound pressure level that is generally measured with an A-weighted decibel scale (dBA), which approximates the range of sound audible to the human ear (where 10 dBA is at the low threshold of hearing and 120–140 dBA is the threshold of pain). Human responses to noise are subjective and can vary. Intensity, duration, frequency, time pattern of noise, and existing background noises are some factors that can influence individual responses to noise. Noise

measurements are usually taken over time to capture daily or hourly variance in noise levels. Noise levels taken over time are often reported in energy-equivalent noise level (L_{eq}), the day-night average noise level (L_{dn}), and the community noise equivalent level (CNEL). L_{eq} is an hourly average, while L_{dn} and CNEL are 24-hour weighted averages.

The City of Eureka includes residential noise exposure policies in the 1999 General Plan Policy Document, Section 7: Health and Safety, Residential Noise Exposure, Table 7-1, Goal 7.G of the General Plan states, with regard to noise exposure, “To protect Eureka residents from the harmful and annoying effects of exposure to excessive noise.” For non-transportation related noise, the maximum allowable noise at the property line of lands designated for noise-sensitive uses cannot exceed 65dB (nighttime) to 70dB (daytime). Transportation noise sources are defined as “public roadways, railroad line operations, and aircraft in flight.”

The project site and surrounding area is characterized by residential, commercial, and industrial land uses, well-developed arterial and local roadways, with local and commuter traffic. Noise in the vicinity of the project is primarily associated with vehicular traffic along Railroad Avenue and Del Norte Street at the north end, Truesdale Street at the south end, and other immediately surrounding intersections. Additional noise sources in the vicinity include commercial and industrial activity, the bay, water and shore birds, and commercial and recreational boating activities.

DISCUSSION

XII a) Less than Significant with Mitigation Incorporated. The Phase A trail alignment mainly passes through open space, but some residential, commercial, and industrial land uses, and local roadways are located near the north and south trail termini. Noise at the northern and southern termini of the proposed trail is primarily associated with motor vehicle traffic along area roads, industrial operations (e.g., the Chevron Terminal), and residential use near Truesdale Street. Ambient noise sources in the project vicinity also include the bay (water and shore birds), and commercial and recreational boating activities.

During construction, a minor increase in ambient noise levels is anticipated at the project activity site. However, construction-related noise would be temporary and would occur only during daylight hours (typically 7:00 a.m. to 7:00 p.m., Monday through Friday; 9:00 a.m. to 5:00 p.m. on Saturday). *Mitigation Measure NOI-1 – Construction Noise*, which includes limited hours of operation during the daytime, advanced notification to occupants of occupied structures, and minimizing high-RPM engine operation to the extent feasible, will be implemented to reduce project-related noise impacts to a less-than-significant level.

Operation of the new trail project is expected to bring more people to the area to enjoy the improved coastal access trail and associated amenities like the gym equipment near Vigo Street. This increase in public use along the new trail is not expected to generate new noise that would exceed standards established in the General Plan (65dB during nighttime and 70dB during the daytime). Additionally, the loudest, potential use, the gym equipment area, is located directly west of Vigo Street, which is not located next to any residences or other sensitive receptors. Therefore, noise impacts associated future operations are considered to be less than significant.

XII b) Less-than-Significant Impact. Project construction may cause minor localized ground borne vibration in the immediate project vicinity as a result of the movement of construction vehicles throughout the alignment. With the exception of a few residences at the south end of the project alignment, there are no human sensitive receptors located within the proposed project area. Noise impacts on these residences would be temporary and short-term, and would be consistent with existing conditions (such as trucks entering the nearby Chevron Terminal), thus the impact would be less than significant. The project would not involve activities such as pile-driving. Project operation would not generate any ground borne vibration or noise that is not consistent with existing conditions.

XII c) Less-than Significant Impact. The project does not involve any construction or operational feature that would cause any substantial permanent increase in existing noise levels. An anticipated minor increase in vehicle traffic and noise generated by trail users (e.g., voices) would not significantly increase the volume of existing noise levels. Additionally, the loudest, potential use, the gym equipment area, is located directly west of Vigo Street, which is not located next to any residences or other sensitive receptors. Motor vehicles would be confined to area roadways and parking areas, and any noise generated by the non-motorized use of the trail would be less than significant.

XII d) Less than Significant with Mitigation Incorporated. Construction activities would result in a minor temporary increase in ambient noise levels from construction equipment and construction-related traffic. Constructing the trail would require the use of heavy equipment for earth moving, grading and compaction, paving, and hauling. The construction phase would temporarily increase localized truck trips to transport materials and equipment to and from the proposed trail corridor. Although construction-related noise would be unavoidable, it would be temporary and intermittent and construction hours would be limited. Mitigation *Measure NOI-1 – Construction Noise* will be used to minimize temporary noise impacts by limiting the hours of construction during to avoid the most sensitive times (e.g., evening), providing advanced notification to occupants of occupied structures, and minimizing high-RPM engine operation to the extent feasible. The impact on ambient noise levels would be less than significant with incorporation of this mitigation.

XII e, f) No Impact. The project area is approximately 2.5 miles from Murray Field Airport. The southern portion of the proposed project alignment is approximately 1.3 miles northeast of the City-owned Eureka Municipal Airport in Samoa. These airports are relatively distant to the project and neither is capable of serving large airplanes. Therefore, no impact is anticipated.

FINDINGS: Based on the discussion above and the mitigation measures below, the uses and activities along the proposed trail alignment, is not anticipated to be different than has occurred in the past or currently occurs. Nor will the project result in the production of unacceptable noise levels that would expose people working or living in the project area. Based on this analysis, the project is expected to have a less than significant impact on noise.

MITIGATION MEASURES

Mitigation Measure NOI-1 – Construction Noise: The City shall include in the construction specifications the following measures to reduce potential impacts associated with construction noise to a less-than-significant level:

- Construction shall be limited to the hours between 7:00 AM and 7:00 PM, Monday through Friday and between 9:00 AM and 5:00 PM on Saturday.
- The Contractor shall notify adjacent residents at least 72-hours in advance when construction is to occur within 250 feet of an occupied structure. The notification should include dates and hours when construction activity noise will occur.
- Each internal combustion engine used for any purposed on the job site shall be equipped with a muffler of a type recommended by the manufacturer. Engines should be turned off when not in use and high-RPM engines should not be used to the extent feasible.

Timing/Implementation: During construction
Enforcement: City Parks & Recreation Department
Monitoring: City and/or its contractor
Evidence of Compliance: City of Eureka official will inspect and approve.

| XIII. POPULATION AND HOUSING. Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-----------|
| a) Induce substantial 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)? | | | | ✓ |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | | | | ✓ |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | | | ✓ | |
| <p><u>THRESHOLDS OF SIGNIFICANCE:</u> This Initial Study considers to what degree the proposed project would result in, or contributes to, population growth, displacement of housing units, demolition or removal of existing housing units, or any project-related displacement of people from occupied housing.</p> <p><u>DISCUSSION</u></p> <p>XIII a) No Impact. The project consists of improvements to non-motorized vehicular and pedestrian transportation facilities. Trail construction would not involve construction of any facility that would directly or indirectly induce population growth. Therefore the project would have no impact on population growth.</p> <p>XIII b) No Impact. The project does not displace existing housing and therefore, would have no impact.</p> <p>XIII c) Less-than-Significant Impact. The proposed trail would be aligned through the PALCO Marsh property and Parcel 4, which are areas frequently used by transients and homeless individuals as a temporary campsite. Public health and safety have long been a concern in this area. One of the purposes of the proposed project is to revitalize the lands through which the proposed trail would be aligned, thus improving public health by removing accumulated garbage and public safety by increasing public recreational use throughout the area and removing its desirability as a camping location. Since camping by transients is illegal and not allowed by the City, this impact is anticipated to be less than significant.</p> <p><u>FINDINGS:</u> Based on the discussion above, the project would not result in substantial adverse impacts regarding population and housing.</p> <p><u>MITIGATION MEASURES</u></p> <p>No project-specific mitigation is required under this subject.</p> | | | | |

| XIV. 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? | | | ✓ | |
| b) Police protection? | | | ✓ | |
| c) Schools? | | | | ✓ |
| d) Parks? | | | ✓ | |
| e) Other public facilities? | | | ✓ | |

THRESHOLDS OF SIGNIFICANCE: This Initial Study considers to what degree the proposed project would result in any changes in existing fire or police protection service levels, or a perceived need for such changes, as well as any substantial changes in the need for, or use of, schools, parks, or other public facilities.

DISCUSSION

XIV a, b) Less-than-Significant Impact. The City of Eureka Fire and Police departments serve the project area. Construction and operation of the proposed project would not necessitate any related new or altered public service facilities. The proposed project would improve emergency response access throughout the project area by enhancing the roads/trails. The project is not expected to increase the need for law enforcement or emergency services; rather a beneficial effect is anticipated. The expected increase in public recreational use would reduce the frequency of police patrols and the demand for fire and emergency services in the project area by decreasing unwanted uses. Potential impacts on service ratios, response times, or service objectives for public services would be less than significant.

XIV c) No Impact. The proposed project is in an area served by Eureka City Schools and would not necessitate additional school facilities. The proposed project has no relation to school district service ratios or school facilities and no impact on schools would occur.

XIV d, e) Less-than-Significant Impact. The proposed project would present an enhanced recreational opportunity and would increase trail connectivity. Additional recreational opportunities

and increased recreational traffic along the Eureka waterfront may reduce other less desirable uses that currently occur in the project area and vicinity. The project would not require services beyond the capacity of the service providers and, therefore, a less than significant impact is anticipated.

FINDINGS: Based on the above, it is expected that the project would result in a less than significant impact on public services.

MITIGATION MEASURES

No project-specific mitigation is required under this subject.

| XV. 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? | | | ✓ | |
| b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | | | ✓ | |

THRESHOLDS OF SIGNIFICANCE: This Initial Study considers to what degree any aspect of the proposed project would be related to demand for recreational facilities or increase use of existing recreational areas such that those areas are physically degraded, including secondary effects such as degradation through over-use of environmentally sensitive areas.

DISCUSSION

There are very few developed public access points along the undeveloped portions of Humboldt Bay shoreline in the City. Safe walking trails that can accommodate larger families are limited to sections of parks. Bicycle access along the Bay is poor and safety issues deter some bicyclists from utilizing Highway 101 and city streets. PALCO Marsh lies adjacent to the eastern study area boundary. The main public access to the marsh is via Del Norte Street where the PALCO Marsh Trailhead is located. Secondary access to the marsh is available through the northern Bayshore mall parking lot and from Vigo Street off of Broadway. Bird watching is a common recreational uses of the marsh, and several viewing benches are spaced along the PALCO Marsh Trail. At the Del Norte Street overlook, there are picnic tables and a trail that goes out to the end of the peninsula.

Existing recreational uses in Humboldt County in and around Humboldt Bay include sport fishing, waterfowl hunting, clam digging, crabbing, sailing, small craft boating, surfing, wind-surfing, skin diving, bird watching, walking, hiking, bicycling, camping, picnicking sight-seeing, plant-viewing, photography, beachcombing, and nature study and appreciation. The most popular recreational opportunities in and directly adjacent to the proposed project area include bird watching and hiking at Elk River Wildlife Area and bird watching at PALCO Marsh. To the west is the Del Norte Street Pier, which is a popular fishing and clamming spot. West of Truesdale Street is also a popular clamming destination.

V a) Less-than-Significant Impact. The proposed project would have a long-term positive effect on recreation by increasing recreational opportunities along the Eureka waterfront, and public access to and along Humboldt Bay. The proposed trail represents a segment of a regional trail system that

would encourage non-motorized and pedestrian recreation by creating a link between the City's and the region's parks, trails, and other recreational facilities.

Although the project would likely lead to an increase in use of recreational facilities adjoining the project such as the PALCO Marsh trail and West Del Norte Pier and Day Use Area, it is not expected to contribute to the physical deterioration of facilities and would have an overall beneficial impact on regional recreational facilities. Increasing visibility and usage among these public facilities may deter illegal activity (e.g., illegal dumping or camping), thereby enhancing public safety and the overall quality of the trail corridor. The passive recreational use of the proposed trail and facilities combined with the recreational opportunities of the larger trail system would be beneficial for the community. Potential impacts on existing recreational facilities would be less than significant.

V b) Less-than-Significant Impact. The proposed trail has independent utility, and will not require the construction of additional recreational facilities in order to fulfill its purpose. The proposed trail is a recreational facility that is likely to encourage (but not require) the construction of other recreational facilities throughout the city and vicinity, primarily other connecting trails and trail-related facilities. Any future connecting and related trail and recreational facility projects with the potential to cause significant environmental impacts would be subject to CEQA and other environmental regulations enacted to protect the environment. Therefore, a less than significant impact is expected to occur.

FINDINGS: As discussed above, neither the proposed recreational facilities, nor related recreational facility projects that may be constructed subsequently are expected to have an adverse physical effect on the environment (refer to Biological Resources as well as Hydrology and Water Quality, above).

MITIGATION MEASURES

No project-specific mitigation is required under this subject.

| XVI. TRANSPORTATION/TRAFFIC. Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-----------|
| a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | | | ✓ | |
| b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures or other standards established by the county congestion management agency for designated roads or highways? | | | ✓ | |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks? | | | | ✓ |
| d) Substantially increase hazards due to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | | | ✓ | |
| e) Result in inadequate emergency access? | | | ✓ | |
| f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)? | | | | ✓ |
| <p><u>THRESHOLDS OF SIGNIFICANCE:</u> This Initial Study considers to what degree, if any, the proposed project would be associated with (a) changes in traffic, circulation, or other changes that might be perceived as adverse, including traffic effects resulting from temporary construction-related changes; (b) any project-related changes in levels-of-service on County or State highways; (c) project-associated travel restrictions that would prevent emergency vehicles from reaching the locations where they were needed.</p> | | | | |

DISCUSSION

XVI a, b) Less-than-Significant Impact. The primary purpose of the proposed project is to improve and encourage non-motorized modes of transportation and recreation along the Eureka waterfront. Because the project would be expected to increase recreational use levels within the proposed project area and vicinity, some additional motorized traffic associated with trail-use parking and non-motorized traffic making use of the trail would be anticipated. The project has been designed to meet the operational needs of adjacent and intersecting roadways, the railway system (although currently not in use, NCRA has specified rails-with-trails requirements), area businesses, and a variety of potential trail users. Adequate existing parking/trailhead facilities for trail users exists at of the West Del Norte Street Public Pier at the trail's north end and the Truesdale Vista Point parking lot and Hikshari' Trailhead at the southwest corner of the Truesdale Street/Howell Street intersection at the south end of the trail.

During construction of the proposed project, construction equipment may cause minor delays and cause minor local detours as it accesses the construction area(s). However, impacts on traffic circulation and level of service on affected roads would be less than significant, since local roads are routinely used by large trucks tied to the industrial uses of the Eureka waterfront. In addition, the movement of heavy equipment used in project construction would be primarily limited to the area between Del Norte Street and the Chevron Terminal, where no motorized use by the public exists and that currently receives minimal non-motorized (e.g., bicycle) use. Construction traffic would be a less-than-significant temporary impact.

Once complete, the proposed project is not expected to significantly increase vehicle traffic on city streets. Construction of the project may actually decrease vehicle trips within parts of the city by encouraging non-motorized travel. Any potential increase in traffic generated by public visitation to the proposed trail and associated access areas would likely be offset by increased non-motorized travel to and from the area by trail users staging from other trail access points throughout the larger trail system.

XVI c) No Impact. The proposed project would have no impact on air traffic patterns.

XVI d) Less-than-Significant Impact. During construction, there is potential for conflict between construction equipment/vehicle traffic and existing using of the area, particularly along Del Norte Street, Truesdale Street, Howell Street, and Christie Street, which provides access to residences and the Chevron facility. These disruptions will be temporary are anticipated to be minor, and lane closures would not be required during construction. Therefore, impacts related to construction are anticipated to be less than significant.

Operation of proposed trail may have a minor impact on transportation and traffic safety at trail/street intersections due to an anticipated increase in non-motorized and motorized traffic interaction near Del Norte Street and Truesdale Street. However, potential conflicts between motorized and non-motorized forms of transportation posed by these trail and road intersections would be less than significant since neither intersection is located on a through road. Both Del Norte Street and Truesdale Street end at Humboldt Bay about 300 feet west of the trail/street intersections. Intersection signage for motorists and trail users and improved crosswalk striping at intersections would further reduce potential conflicts between motorized and non-motorized uses.

The proposed trail alignment between Del Norte Street and Truesdale Street is generally straight with a few gentle curves. There are no dangerous intersections between Del Norte Street and the Chevron Terminal. Driveway crossings at the Chevron Terminal would be ADA-accessible and include warning signage and markings both on the trail and the approaching vehicular way. If determined necessary by the City, the trail would include yellow centerline striping and additional warning signage and striping approaching intersections with existing roads and driveways. In addition, signage would be added along the trail warning users of curves, bends, and other hazardous situations. Speed control can only be maintained through signage and striping and other visual cues; speed bumps or other surface irregularities cannot be used to control the speed of bicycles and other non-motorized vehicles. Where the proposed trail would be directly adjacent to an inactive rail line, the project has been designed to meet all applicable NCRA policies.

The proposed trail may create conflicts between pedestrians and bicyclists due to the difference in these activities. However, since the proposed trail would have striping, signage, and unpaved shoulders on both sides that could be used by slower moving trail users such as birdwatchers who may want to get out of the main travel lanes, substantial safety related conflicts between different types of trail users would be avoided.

There is a perceived hazard associated with trails adjacent to active rail lines; however in areas where the proposed trail would be directly adjacent to an inactive rail line, the project has been designed to meet all applicable NCRA policies and includes the following safety design features: fencing between the trail and the RR track along the entire alignment with a minimum setback of 8.5 feet from RR centerline, RR crossing pavement markings and signage at all crossing locations, minimum 45° angle for all trail / RR crossing, and the City would work with NCRA to install additional bar crossing as required if the RR becomes active. These features would avoid any substantial conflicts between the rail line (which is currently inactive) and trail users. NCRA policy requires a Trail Safety Plan be completed by any public agency (e.g., the City) proposing a rails-with-trails facility. The Trail Safety Plan must address the following issues:

- **Section 2.2: Trespassing and Crime Prevention.** Topics include trespassing reduction and crime prevention strategies, such as regulatory signage, emergency access and identification of a Trail Manager.
- **Section 2.3: Emergency Response.** Topics include emergency response procedures and responsibilities.
- **Section 2.4: Security and Patrols.** Topics include signage, establishment of a coordinated and responsive patrol service and other security measures.
- **Section 2.5: Trail Barrier Design Standards.** Topics include recommended barrier systems and ROW access.

With incorporation of a Trail Safety Plan and safety features described above, the proposed project would not substantially increase transportation hazards as a result of design features or incompatible uses. Potential transportation design hazards associated with the Phase A trail would be less than significant.

XVI e) Less-than-Significant Impact. Existing roads and trails within the proposed project area are suitable for the purpose of emergency access. During construction there could be minor impediments to emergency vehicles needing to access the proposed action area, but this would be a temporary impact and would be less than significant since access could be made from either end of the proposed project area and points in-between such as Vigo Street and Bayshore Mall, and adequate room for passage of vehicles past active construction areas would be anticipated. Project operation would not impede emergency response vehicles. Bollards used at the trail heads to deter public motor vehicle access would be removed to facilitate access in an emergency.

XVI f) No Impact. The proposed project would significantly enhance alternative transportation along the Eureka waterfront. The project would be consistent with the City's adopted plans, policies, and programs that support alternative transportation. The project is anticipated to be a benefit to public transportation and would not adversely impact the performance or safety of alternative transportation facilities within the city.

FINDINGS: Based on the above, staff concludes that the project would have a less than significant impact on transportation or traffic.

MITIGATION MEASURES

No project-specific mitigation is required under this subject.

| XVII. UTILITIES AND SERVICE SYSTEMS. Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-----------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | | | | ✓ |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | | | | ✓ |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | | ✓ | | |
| d) Have insufficient water supplies available to serve the project from existing entitlements and resources (i.e., new or expanded entitlements are needed)? | | | | ✓ |
| e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | | | ✓ | |
| f) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs? | | | ✓ | |
| g) Violate any Federal, State, and local statutes and regulations related to solid waste? | | | ✓ | |
| <p><u>THRESHOLDS OF SIGNIFICANCE:</u> This Initial Study considers to what degree the proposed project would be related to: (a) a substantial demand for water supplies affecting existing entitlements and resources; (b) increase in runoff intensity that exacerbates drainage conditions and changes; and (c) insufficient provision for solid waste disposal.</p> <p><u>DISCUSSION</u></p> <p>XVII a, b) No Impact. The proposed project does not involve the use or construction of any facilities that would require water or wastewater infrastructure and would therefore have no impact on public water and wastewater utilities.</p> | | | | |

XVII c) Less than Significant with Mitigation Incorporated. Possible minor alterations of drainage systems include limited realignment, extension, or replacement of low volume culverts and other minor stormwater infrastructure device alterations to better accommodate the trail. These actions would require ground-disturbing activities that have the potential to result in erosion and sedimentation. To mitigate for potential significant temporary runoff impacts associated with construction that could result in erosion, a SWPPP will be prepared and implemented as described in *Mitigation Measure BIO-3 – Erosion and Sedimentation Control*. With the incorporation of this mitigation, short-term erosion and sedimentation impacts associated with the proposed construction of stormwater drainage facility improvements would have a less-than-significant impact.

XVII d) No Impact. No new or expanded water entitlements would be required for the project. There would be sufficient water supply available from offsite sources to serve the project if water is needed for construction and during routine maintenance operations.

XVII e) Less-than-Significant Impact. The proposed project would be limited to trail improvements and would not result in a change to existing wastewater treatment demands within the project area. Potential increased demand for restroom facilities at offsite locations as a result of more individuals using the trail would be less than significant when considered in the context of the length of the proposed trail (an approximately 1.2 mile segment) over the length of the existing trail system along Humboldt Bay and vicinity. The existing public restroom located at the southern end of the trail at Truesdale Street is sufficient to serve additional trail users.

XVII f, g) Less-than-Significant Impact. The local solid waste provider is the Humboldt Waste Management Authority (HWMA). The project could temporarily generate an increase in solid waste disposal needs as accumulated trash is removed from Parcel 4 during project construction. Construction of the proposed project is not anticipated to generate significant amounts of construction-related solid waste, although there could be some demolished materials, old railroad ties, ballast materials, and other trash. Non-recyclable waste materials would be disposed of at a suitable facility such as the HWMA transfer station in Eureka where it would be trucked to a state licensed landfill located in Anderson, California or Medford, Oregon in compliance with local, State, and Federal regulations pertaining to solid waste disposal. Recyclable construction materials (e.g. scrap metal, wood, and concrete) would be taken to local businesses for reuse. Any potentially hazardous waste materials would be disposed of at an approved Class II landfill (such as in Marysville, Stockton, or Livermore) that is equipped to handle hazardous waste.

Operation of the proposed project is not anticipated to generate solid waste in amounts that would adversely affect the capacity of the local landfill. The project includes waste receptacles, recycling bins, and pet waste stations. Solid waste collected as a part of the project would be disposed of as previously described by HWMA. Landfill facilities used by HWMA have sufficient capacity to serve the project's solid waste disposal needs, and a less-than-significant impact is anticipated.

FINDINGS: The project, as mitigated, is expected to have less than significant impacts related to utilities or service systems.

MITIGATION MEASURES

Implement *Mitigation Measure BIO-3 – Erosion and Sedimentation Control* to minimize impacts that could result from minor changes in drainage patterns.

| XVIII. 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 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 a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | | ✓ | | |
| 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). | | | ✓ | |
| c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? | | ✓ | | |

XVIII a) Less than Significant with Mitigation Incorporated. As discussed in the preceding sections, the proposed project has a potential to result in adverse effects on air quality, biological resources, and cultural resources. Special-status plant species that could be affected by the project are Lyngby's sedge, Point Reyes bird's-beak, Humboldt Bay owl's-clover, dwarf alkali grass, and western sand-spurrey. Special status wildlife species that could be affected by the project are green surgeon (southern and northern DPSs), SONCC ESU coho salmon, Northern California Coast DPS steelhead, California Coastal ESU Chinook salmon, longfin smelt, southern eulachon DPS, tidewater goby, coastal cutthroat salmon, northern red-legged frog, brown pelican, northern harrier, white-tailed kite, short-eared owl, bald eagle, peregrine falcon, Vaux's swift, purple martin, loggerhead shrike, little willow flycatcher, yellow-breasted chat, yellow warbler, pallid bat, and Townsend's big-eared bat. Potential impacts on resources and the specified species are discussed in detail in the corresponding sections above. Mitigation measures required to avoid or reduce the significance of project impacts below a threshold of significance are described in the related section. With implementation of the required mitigation measures, all project-related impacts would be reduced to a less-than-significant level. Although cultural resources are not likely to be affected, there is the potential for previously undetected cultural resources or human remains to be affected by project activities. Therefore, mitigation measures have been incorporated into the proposed project to ensure protection of any such resources in the event of inadvertent discovery. With implementation of *Mitigation Measure* –

LU-1 – Obtain Land Use Permits, which requires the City to obtain a Coastal Development Permit from the Coastal Commission and a Conditional Use Permit for activities proposed within coastal-dependent industrial and natural resources lands, the project is consistent with the existing land uses, and the relevant plans and policies that govern such projects.

XVII b) Less-than-Significant Impact. Projects likely to occur in the vicinity of the proposed trail include: Phase B of the Eureka Water Trail Project, which would extend from C Street south to Del Norte Street, and possibly the Marina Center Development; ongoing and new contamination clean-up at several waterfront locations; and development or redevelopment of other waterfront commercial, industrial, and recreational facilities. The proposed project and other related projects in the area fall under the jurisdiction of multiple agencies with discretion over projects that could have an adverse impact on the environment. Projects in the area also typically receive a high degree of scrutiny from the public and other stakeholders regarding environmental impacts. As such, the projects will be required to comply fully with environmental regulations and are unlikely to cause significant environmental impacts.

The project is also a part of the greater planned California Coastal Trail and may induce the construction of connecting segments of the statewide trail system. These segments would also undergo environmental review and be subject to local, state, and federal environmental regulations. Impacts associated with the project would be limited to the construction phase for the most part, and can be fully mitigated for at the project level. As a result, cumulative impacts are considered to be less than significant.

XVIII c) Less than Significant with Mitigation Incorporated. The project has been designed to avoid significant environmental impacts to the extent possible. Mitigation measures described in this Initial Study will be used to avoid or minimize potentially adverse effects to humans that could result from the construction and operation of the proposed project. As documented in this initial study, the project would not involve any actions that would have a substantial direct or indirect impact on the human environment that cannot be mitigated to a less-than-significant level.

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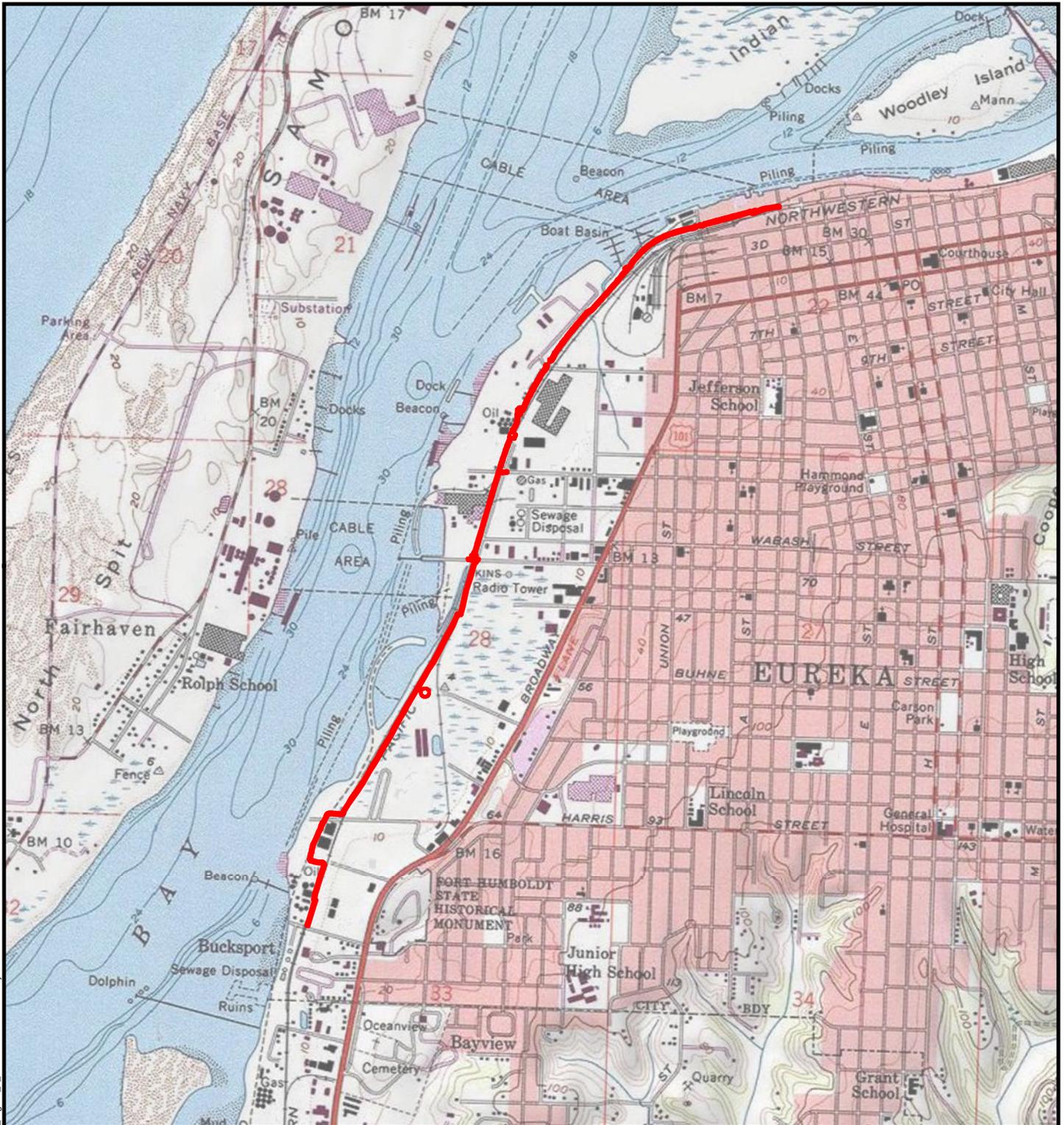
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Appendix A

Figure 1. Project Location
Figure 2. Proposed Project Layout
Figure 3. Vegetation Communities



 Proposed Project Area (11.19 acres)

Public Land Survey:
T05N, R01W, Sec.28, 33

USGS 7.5 Quad:
Eureka 1972



1:24,000

Study Area Location



Humboldt County, California

Figure 1
Project Location and Vicinity



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Figure 2
Proposed Project Layout



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Figure 3
Vegetation Communities