CEQA
Documentation

Use of a Finding of No Significant Impact (FONSI) in lieu of a Negative Declaration for the Plumas National Forest, Mt. Hough Trails Project

Background

Plumas County proposes to construct approximately 37 miles of new, motorized, multiple-use trails within the existing Mount Hough trails system (Figure 1).

There is a desire for additional access to the Mount Hough area that would accommodate a variety of recreational users in a safe and resource sensitive manner. The project would expand the existing Mt. Hough trails system (Phase One), provide connectivity to the existing trails, and expand access to the communities of Quincy and Taylorsville. These new trails (Phase Two) would provide additional opportunities for motorized and non-motorized users to explore Plumas County. The purpose of the project is to provide long-term sustainable trails, with minimal maintenance needs, that expand access to multiple user groups.

The trails would be located in mixed conifer forest. The proposed trail segments are located on the Plumas National Forest, Mt. Hough Ranger District. The project is located north and east of Quincy in Plumas County, California. The project area occupies portions of Township 25 N Range 9 East, Sections 1, 10-13, 15, 23-25; Township 26 North, Range 9 East, Sections 35 and 36; Township 25 North, Range 10 East, Sections 3, 6, 8, 10, 15, 17, 21-23, 25, 26, 28, 30, 31, 32, and 35; Township 24 North, Range 10 East, Sections 2, 3, 4, 5, 6, 8, 9 and 10; and Township 26 North, Range 10 East, Section 34 on the Crescent Mills, Quincy, Spring Garden and Taylorsville United States Geological Survey 2018 Quadrangles.

Project implementation incorporates Trail Construction Standards and Management Requirements (USFS 2013). Management Requirements provide measures minimizing project effects related to aquatic wildlife, botanical resources, and terrestrial wildlife; cultural resources; fire and fuels; invasive plants; recreation; visual resources; and watershed, soils, and aquatic resources.

The trails would be constructed to Trail Development Class 3 (moderate level of development) standards with trail tread width of 24" – 36”. The trails would be motorized multiple use trails and would be managed for hiking, e-biking, and equestrian use, as well as single track motorized vehicles and some ATV use. Clearing limits would be 4’ from trail center and 8’ tall. Trail grade would average under 10 percent with a recommended average grade of seven (7) percent and maximum constructed grades not to exceed 15 percent for more than 150 feet. One bridge would be constructed crossing Gilson Creek. Trail segments would be constructed following Trail Construction Standards described in the Plumas National Forest Trail Design Standards document, Management Requirements, and Best Management Practices

(BMPs) listed in the Region 5 Soil and Water Conservation Handbook to minimize the potential for tread wear, erosion, and sediment transport (USFS 2013).

The trail would accommodate multiple uses including motorcyclists, mountain bikers, hikers, equestrians and ATVs. Signage on the new trail proposal would be installed to alert trail users to hazardous sections, multiple uses, and two-way traffic to minimize potential trail user conflict and maintain public safety. Trail design would include frequent undulations so that grade reversals keep speeds down and lower throttle use. Width limiting barriers would be installed at trail entryways to maintain classification of motorized use (i.e., prevent ATVs from riding on single-track) and at junctions with non-motorized trail to restrict motorized intrusion onto non-motorized trails.

Trail construction would entail brush removal with chainsaws and hand tools and use of a Sweco 480 trail dozer, Sweco 450 trail dozer, Sutter 300 trail dozer, mini-excavator, and a micro- excavator (TB 215) to create a trail pad. Blasting would be used where the trail alignment crosses bedrock that a trail machine cannot carve. Blasting efforts would utilize Magnum Buster, a non-detonating rock breaking tool using a high-pressure gas expansion cartridge introduced into a pre-dilled hole filled with water or water gel. The specific trail locations would be refined with ground verification of existing conditions.

By developing new trails at lower elevations (below 5,000') and on south facing aspects, recreational trail use may be extended into the shoulder seasons, making the MHTS a destination for 8-10 months, as opposed to the current 6-month season.

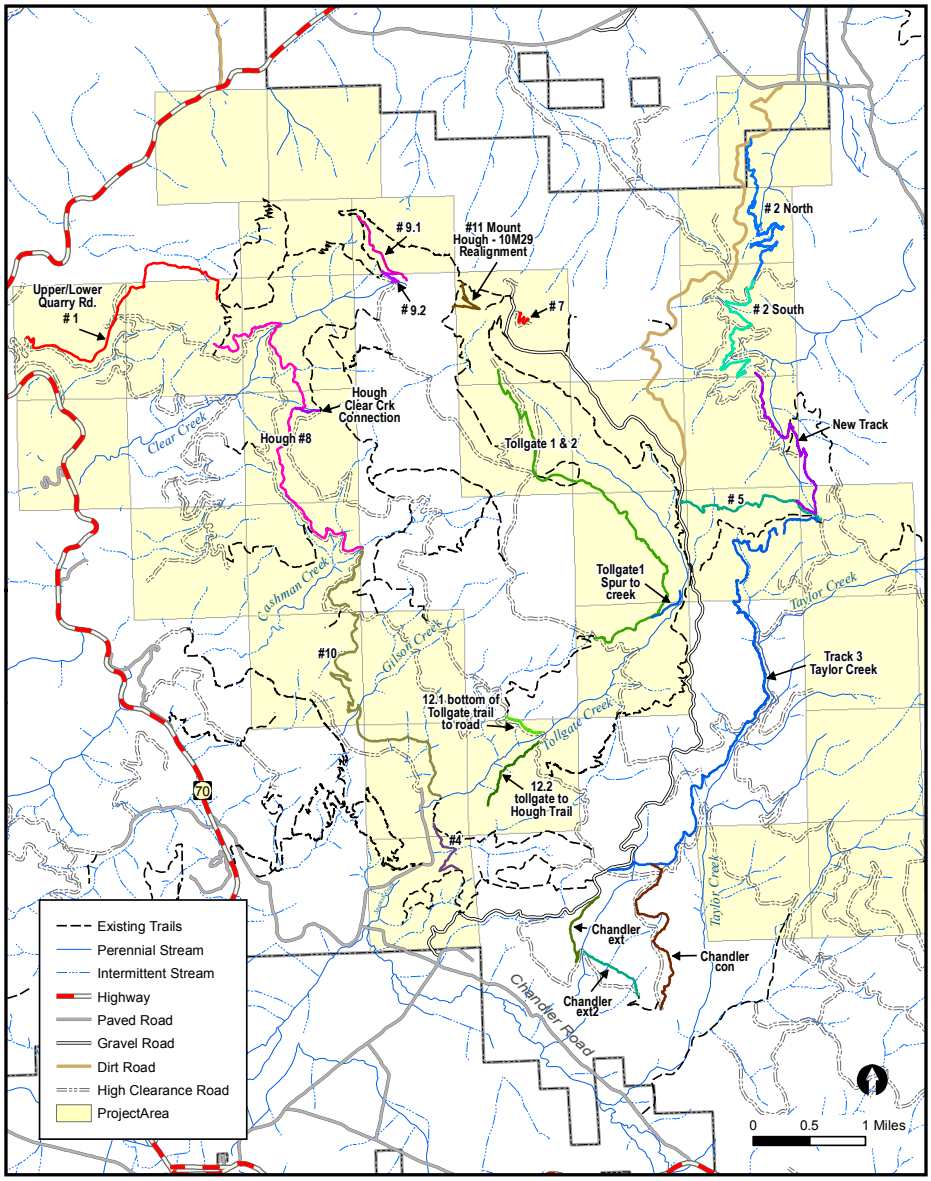
No mechanized trail construction or chainsaw use would occur between Feb 15 and Sept 15 near northern goshawk and California spotted owl Protected Activity Centers known to occur in the project area unless surveys confirm no nesting is occurring.

The Plumas National Forest completed the Mount Hough and South Park Environmental Assessment (EA) in April 2013 (USDA 2013) for the Mount Hough Trails Project Phase I (Phase I) in accordance with the National Environmental Policy Act (NEPA). The EA evaluates the potential for environmental impacts on farmland, biological resources, cultural resources, soils and water, and public recreation and safety. These resources were selected for evaluation based on internal and external scoping. The EA also addresses project consistency with federal regulations governing these resources such as the Clean Water Act, Endangered Species Act, National Historic Preservation Act, National Forest Management Act, as well as the Plumas Forest Land Management Plan. A Decision Notice and Finding of No Significant Impact (FONSI) was signed on June 11, 2013. The FONSI concluded that, with implementation of Management Requirements, the project would not result in a significant impact on the environment and is consistent with governing federal, state, and local laws.

The California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation (OHMVR) Division proposes funding the Mt Hough Trails Project using off-highway vehicle (OHV) grant funds via the Grants and Cooperative Agreements Program. This project is considered a project subject to environmental review under

the California Environmental Quality Act (CEQA; Public Resources Code [PRC] § 21000 et seq.).

Figure 1. Mount Hough Trails Project Location



CHICO environmental

Mt. Hough Trails Phase 2

CEQA Guidance and Findings

CEQA USE OF FONSI

Plumas County, acting as a lead agency under CEQA, has reviewed the Mt Hough-South Park EA, which encapsulates the Mt. Hough Trails project, and FONSI prepared by the Plumas National Forest (Attached). CEQA Guidelines (§15063(a)(2)) allow a lead agency to use an environmental assessment or a similar analysis prepared pursuant to NEPA to meet CEQA requirements for conducting an Initial Study if only minor technical changes or additions are necessary (CEQA Guidelines §15164(b)). Further, CEQA Guidelines (§15221) direct that when a project has already been the subject of a FONSI, the lead agency should use the FONSI if: 1) it has been prepared before the CEQA Environmental Impact Report or Negative Declaration would otherwise be completed for the project; and 2) it complies with the provision of the CEQA Guidelines.

Plumas County has determined that the Mount Hough-South Park Proposed Trail System Project (Phase I) EA fully describes the Mount Hough Trails Phase 2 Construction Project geographic area, environmental setting, potential environmental effects, and incorporation of Trail Construction Standards and Management Requirements to avoid significant impacts. This content meets the CEQA requirements for an Initial Study specified in CEQA Guideline Section 15063(d). The EA does not include the new trails proposed in the Phase 2 Project. The EA does not address all environmental factors addressed by CEQA Guidelines Appendix G Environmental Checklist for consideration. Therefore, supplemental environmental information is provided below to address the CEQA Environmental Checklist subjects that were not addressed in the EA/FONSI. The discussion is presented for the purpose of completing the CEQA record and amplifying the EA/FONSI determination that the project would have no impact or less than significant impacts in these categories.

The supplemental CEQA Environmental Checklist discussion does not identify new significant effects, an increase in severity of significant effects, or a need for mitigation not addressed in the FONSI. The supplemental CEQA information merely clarifies and amplifies the determination of the FONSI and is an insignificant modification to the environmental review analysis. Therefore, use of the FONSI in lieu of a Negative Declaration is appropriate.

The proposed project was found to be categorically excluded from NEPA and the Decision Memo (DM) Mount Hough Trails Phase 2 Construction Project was prepared for the project. The DM determined that the Phase 2 project was categorically excluded from documentation in an environmental impact statement (EIS) or an environmental assessment (EA) due to the similarity of project nature and location as the Phase I. The Mount Hough Trails Phase 2 Project Biological Assessment/ Biological Evaluation-Management Indicator Species- Migratory Bird Species Report (BABE-MIS-MB) was prepared October 27, 2020 to determine if the Phase 2 project would result in a trend toward listing or loss of viability for sensitive species, and to document effects of threatened or endangered species and/or their critical habitat

(USFS, BABE-MIS-MB, 2020).

CEQA FINDINGS

The EA, together with the CEQA Environmental Checklist documentation provided below, comprises the Initial Study used by the OHMVR Division to evaluate the potential for the project to have significant effects pursuant to CEQA Guidelines Section 15063(a)(2). With the implementation of the USFS Trail Construction Standards and Management Requirements included in the EA, no environmental effects related to the project activities would exceed stated CEQA-related significance criteria. There is no substantial evidence, in light of the whole record before the OHMVR Division, that the project may have a significant effect on the environment.

Based on the environmental evaluation presented in the Initial Study (defined above as the EA plus the CEQA Environmental Checklist), the project would not cause significant adverse effects related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gas emissions, hazards and hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation, tribal cultural resources, utilities/service systems, and wildfire. In addition, substantial adverse effects on humans, either direct or indirect, would not occur. The project does not affect any important examples of the major periods of California prehistory or history. Nor would the project 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. The project would not have impacts that are individually limited, but cumulatively considerable. Pursuant to CEQA Guidelines Sections 15063(1)(2) and 15221, the OHMVR Division intends to use the EA/FONSI in lieu of preparing its own Negative Declaration to provide OHV grant funds to the Plumas National Forest for the Mt. Hough Trails Phase 2 Construction Project.

CEQA Environmental Checklist Discussions

The following discussion addresses environmental subjects identified in the CEQA Guidelines Appendix G Environmental Checklist, which were not covered in the Mt Hough-South Park Project EA. All potential impacts would either not occur or be minor in nature and considered less than significant.

Aesthetics. The EA does not directly address potential project effects on scenic resources. Additionally, the EA did not specifically address potential visual effects to scenic resources within the viewshed of a state scenic highway or whether the project would create a new source of substantial light and glare. There are no designated state scenic highways within or near the project area. Trail improvements would blend into the surrounding landscape and building materials would be utilized from on site or would be chosen to blend into the natural surroundings. The trail would not include

improvements that could introduce a new source of light or glare, e.g., no lighting, reflective surfaces, and little to no use at night. Therefore, the project would not have significant adverse aesthetic impacts.

Agriculture/Forestry. The EA project area is located within a national forest and does not contain any prime farmland nor does it contain any Williamson Act contracted land (DOC 2010). It would not result in the loss of forest land or conversion of forest to non-forest use. The project will not conflict with existing zoning of or cause rezoning of timberland because it won't be converting the land for another use. Therefore, the project will not have significant adverse effects on agriculture or forestry impacts.

Air Quality. The EA determined the additional trail mileage would have very little effect on air quality (EA p. 65) and thus did not provide any detailed impact analysis. The EA did not discuss emissions during trail construction. This supplemental CEQA discussion provides additional air quality information to provide further clarity for the CEQA evaluation.

Air quality is a function of pollutant emissions and topographic and meteorological influences. The physical features and atmospheric conditions of a landscape interact to affect the movement and dispersion of pollutants and determine its air quality. Federal, state, and local governments control air quality through the implementation of laws, ordinances, regulations, and standards.

The California Air Resources Board (CARB) divides the state into air basins that share similar meteorological and topographical features. Plumas County is located in the Mountain Counties Air Basin (MCAB), where topography and climate vary dramatically.

Covering an area of roughly 11,000 square miles, the MCAB lies along the northern Sierra Nevada Mountain range close to or contiguous with the Nevada border. Elevations range from a few hundred feet at the Sacramento County boundary to more than 10,000 feet above sea level at the Sierra Crest. The foothills, mountain peaks, and valleys of the Sierra Nevada range influence local differences in rainfall, temperature, and wind patterns. In general, high elevation areas in close proximity to the Sierra Nevada crest have cooler temperatures and receive much more precipitation than lower elevation foothill areas. During the summer, strong eastward flowing winds transport pollutants from the San Francisco Bay Area, Sacramento, and San Joaquin Valley Air Basins into the MCAB. California regulations governing the CARB identifies portions of the Northern Sierra Air Quality Management District in the MCAB as an area impacted by ozone transport from upwind air basins (17 CCR §70500).

The Northern Sierra Air Quality Management District (NSAQMD) is a district created by state law to enforce local, state, and federal air pollution regulations. The NSAQMD regulates emissions from sources of air pollutants and administers state and federal air

pollution control requirements. The portion of the MCAB under the jurisdiction of the NSAQMD is non-attainment for state and federal ambient air quality standards for ozone and state ambient air quality standards for particulate matter (PM10; CARB 2019).

The Mt. Hough Trails Project (Phase 2) would be completed over the course of 10 to 12-weeks during May through July 2022. The majority of work would be completed by trail crews cutting back vegetation with chainsaws and finish work with hand tools, a small mini-excavator, and a small trail dozer. Construction equipment emission would be low and any burning would be completed under an approved Air Pollution Permit in close coordination with the local Air Quality Management District.

Construction equipment emission estimates for the Mt. Hough Trails Project (Phase 2) were calculated using the Sacramento Metropolitan AQMD's Road Construction Emissions Model, Version 9.0.0. The Mt. Hough Trails Project was estimated to generate construction emissions of 2.15 lbs/day of nitrogen oxides (NOx) and 0.11 lbs/day of particulate matter (PM10; Appendix A).

NSAQMD utilizes a Level A significance threshold of 24 lbs/day for NOx and 79 lbs/day for PM10 (NSAQMD 2019). Based on this criterion, the Mt. Hough Trails Project construction emissions are well below the significance thresholds. Therefore, the impact would be less than significant.

The emissions of criteria pollutants generated by project equipment over the construction period would be small scale and would not have a significant impact on the environment. There are no sensitive receptors (residences, schools, hospitals, etc.) located near the project site, and thus none would be exposed to air pollutant emissions from project construction or trail use.

The proposed development of 37 miles of new motorized trails is designed to serve existing motorized recreation occurring in the area and presently occurring on roads designated for street legal vehicles only. Any increase in motorized recreation use occurring as a result of this project is expected to be minor. By developing new trails at lower elevations (below 5,000') and on south facing aspects, we can expand recreational trail use into the shoulder seasons, making the MHTS a destination for 8-10 months, as opposed to the current 6-month season. Consistent with the EA conclusions, vehicle emissions associated with the new trail mileage and redistributed OHV use would have little effect on air quality (EA p. 65) and would be less than significant.

Biology. The Biological Assessment/Biological Evaluation (BABE) addresses federal special-status wildlife or plant species, in addition to aquatic and riparian habitat (USFS, BABE-MIS-MB, 2020). Some of the federal species addressed in the BABE are also California special-status species. The BABE concludes the project would have no effect on the following federally listed or proposed fish and wildlife species: Carson wandering skipper, Sierra Nevada yellow-legged frog, gray wolf, pacific fisher and Delta smelt. The BABE also concludes the project is not expected to affect suitable habitat for wolverine and is only expected to have minor disturbance impacts on

northern goshawk and California spotted owl. Potential effects to no federal threatened listed species and two species on the USFS Region 5 Sensitive Species list (northern goshawk and California spotted owl) are described within the BABE (pp. 15-17) and the EA (pp. 54).

The BABE addressed species that are solely California special-status species. The California Natural Diversity Database (CNDDB) lists nine California special-status species known to occur within a USGS 9-quad radius of the project area (Canyondam, Greenville, Moonlight Peak, Twain, Crescent Mills, Taylorsville, Meadow Valley, Quincy and Spring Garden) that have potential to occur at the project site. These species include the following: Foothill yellow-legged frog, Greater sandhill crane, Great Grey owl and Willow flycatcher (CNDDB, 2021). The BABE concludes that the project will have no effect on these California special-status species.

The project has been planned to avoid or minimize effects upon riparian areas. The project area does not contain peatlands or fens. Riparian/wetland plant communities, where they exist, would be protected during trail construction. Trail construction is unlikely to result in major impacts to riparian areas. The project would not impair wildlife movement or corridors. The project is not subject to, nor would it conflict with, any habitat conservation plan. The project is not located in an ecologically critical area.

The Mt. Hough Trail Project crosses through potential habitat for the following Forest Service Sensitive Species: Pallid Bat, Sierra Nevada Red Fox, American Marten, Northern Goshawk, California Wolverine, Townsends Big-Eared Bat, Western Red Bat, Bald Eagle, and the SNYLF. There was no evidence of these species in the project area according to the Biological Survey. Evidence of Forest Service Sensitive Species that were found on site included the Bumblebee, California Spotted Owl , and the Northern Goshawk (BABE pp. 15-16).

Cultural Resources. A record search, intensive resource inventory, and cultural resource report that complies with Section106 of the National Historic Preservation Act was completed for the wider Mt. Hough Trial Project (EA pp. 51-53). The EA (p. 52) concludes that adverse impacts to cultural resources would be avoided through project design and site avoidance.

If human remains are inadvertently discovered, the Plumas National Forest would follow the procedures as outlined in California Health and Safety Code section 7050.5. All project activities at the find site must come to a complete stop, and no further excavation or disturbance of the area or vicinity would occur. The county coroner would be contacted immediately, and if the coroner determines or has reason to believe that the remains are Native American, the coroner would contact the Native American Heritage Commission (NAHC) within 24 hours of making this determination. Whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC follows the procedures as outlined in PRC section 5097.98.

Energy. Neither the FONSI nor the EA directly addressed the project's energy use. Energy consumption is closely tied to the issues of air quality and greenhouse gas (GHG) emissions. The project would be constructed on federal (USFS) land; neither state nor local plans for energy efficiency would apply, although any applicable state fuel efficiency and emission standards would apply to construction vehicles and motorcycles used on the trail. OHV recreation is already very popular in Plumas National Forest. The trails would provide additional opportunity for single-track motorized use. The project would generate new demand for OHV recreation and an associated increase in energy use and would redistribute some of the existing motorized uses in the national forest. The trail would also be available to non-motorized recreation and is expected to be used by hikers, mountain bikers, and equestrians. Given the existing demand for the trail and the existing OHV and other recreation uses in the project area, construction and use of the proposed trail would not result in a potentially significant energy impact because it would not cause wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Geology and Soils. The EA (p. 42) addresses project impacts on soils and concludes that with implementation of trail design standards, soil and hydrology management requirements, and best management practices, impacts to soils would be minimal. The project site is not located in an area subject to strong seismic shaking, and the proposed trail project is not a use that would typically create seismic related hazards to trail users if there was seismic-related ground shaking. The trail alignment was chosen to avoid areas with unstable geologic units and unstable soils. Due to the mountainous terrain, there are no hazards associated with subsidence or liquefaction. Expansive soils are not a consideration in the project area, and the project does not involve construction of any structures. The project would not exacerbate any geologic conditions creating risk or hazards. The project does not involve the use of septic tanks or wastewater disposal systems that could affect soils.

The project site does not support geological components (sedimentary and metasedimentary rock) that have potential to support unique paleontological resources or unique geologic features (Caltrans 2021, Hamilton 1916). As a result, there is low likelihood for in situ paleontological resources to be disturbed by project activities, and no impacts are expected.

Greenhouse Gas Emissions (GHG). The EA does not directly address greenhouse gas emissions. The discussion below provides additional context and analysis to assess.

The California Global Warming Solutions Act of 2006 (Assembly Bill 32) required the Air Resources Board (CARB) to reduce GHG emissions to 1990 levels by 2020. In

2015, Governor Jerry Brown issued Executive Order B-30-15 establishing a GHG reduction target to reduce GHG emissions by 40% below 1990 levels by 2030. The California Air Resources Board (CARB) adopted the 2017 Climate Change Scoping Plan and has amended or adopted several regulations intended to reduce GHG emissions that achieve the adopted 2030 GHG reduction goal, including the Low Carbon Fuel Standard. These actions improve energy efficiency, lower the carbon content of transportation fuels such as gasoline and diesel, and lower statewide GHG emissions levels. The state codified a 2030 GHG reduction goal and the Office of Planning and Research amended the State CEQA Guidelines to provide new guidance regarding GHG impacts analysis.

The proposed trail development project would produce GHG emissions from construction- related fuel combustion. Project implementation would occur gradually over three months. GHG emission estimates were modeled for the Mt Hough trails development project on the Plumas National Forest within Plumas County using the Sacramento Metropolitan AQMD's Road Construction Emissions Model. The Project was estimated to generate 19.54 $MTCO_2e$ (Appendix A).

Northern Sierra Air Quality Management District has adopted a GHG threshold of 10,000 $MTCO_2e$ per year for project construction phases and 1,100 MTCO2e per year (de minimis level) for land use operational phases (NSAQMD 2019). The estimated GHG emissions per year are well below the significance thresholds. Therefore, impacts related to project GHG emissions would be less than significant.

The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Construction vehicle and equipment GHG emissions are identified and planned for in CARB's GHG emissions inventory and Scoping Plan, which contains measures designed to achieve the state's GHG reduction goals in AB32 (CARB 2015). Moreover, the project would not contain any stationary sources that are subject to state or federal GHG permitting or reporting regulations. The new emissions resulting from the 37 miles added to the National Forest Trail System would not substantially increase the emissions occurring in the air basin and would remain below significance thresholds. The new GHG emissions would not conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Hazards and Hazardous Materials. Neither the FONSI nor the EA directly addressed the project's potential impacts related to hazards or hazardous materials as described in Appendix G. The Mt. Hough Trails Project would not create hazards due to the generation, routine transport, disposal, or upset of hazardous materials. The project would not generate hazardous emissions or require crews or the public to handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. There are no known hazardous materials sites or cleanup sites in the project area (DTSC 2021, SWRCB 2021, USEPA 2021). The project is not located within an airport land use plan or within two miles of a public use airport and would not interfere with adopted emergency response or evacuation plans. As discussed below

in Wildfire, the project would not expose people or structures to risk of loss, injury or death involving wildland fires.

Hydrology. The EA (p. 42) addresses potential project impacts to soils and surface waters as a result of project trail construction and concludes that with implementation of trail design standards, soil and hydrology management requirements, and best management practices, the project would have a minimal impact to water quality and stream hydrology.

The project would not increase water use, create a demand on groundwater supply, or otherwise interfere with groundwater volumes or recharge rates. Groundwater supplies would be unaffected by the project, and no impervious surfaces would be added. The project would be designed to promote natural runoff of the newly created trail through designing it in accordance with Plumas National Forest Trail Design Standards; the project would not result in flooding or increased potential for flooding. The project would not contribute runoff that would exceed storm water drainage systems or create additional sources of polluted runoff. The project does not involve construction of residential or other structures within a 100-year flood plain or in an area that could be affected by failure of a levee or dam. The project is not located in an area that is subject to seiches, tsunamis, or mudflows.

Land Use. The proposed Mt. Hough Trails Project is located on federal land within a national forest. Local and state land use plans do not apply to federal lands. The trail would be located within a roaded natural area identified in the Forest Plan and would be consistent with roaded natural and semi-primitive motorized standards as identified in the Forest Plan (EA p. 1). The Decision Notice and FONSI found that the proposed project is consistent with the Land and Resources Management Plan for the Plumas National Forest. The proposed project would not change the nature of any land use within the area. The project does not conflict with land use policy.

Mineral Resources. No important mineral resources would be removed from the project area as the project would not change the nature of any land use within the area.

Noise. The EA did not directly evaluate the potential noise impacts from trail use. Noise levels would temporarily increase during trail construction work due to the use of power tools and heavy equipment (trail dozer and mini-excavator). Localized ground vibrations may occur during implementation of the project due to the use of heavy equipment. Blasting will occur during construction, causing bursts of loud noise and vibrations. Blasting would be limited to weekdays for a period of the 10- to 12-week construction season. Construction noise and ground vibration would be limited to weekdays for a period of the 10- to 12-week construction season. There are no sensitive receptors in the vicinity of the project site that would be affected by heavy equipment noise and vibration. Increases in ambient noise levels would be temporary, intermittent, and localized to the specific area where construction is occurring and

would not be significant.

The project area is not located within two miles of a public airport, or private airport or airstrip; the project would not result in exposure of people to excessive noise levels from airport operations.

Population and Housing. The trail project does not involve development of housing or any other activities that would increase population growth in the area. The project would not displace any housing or people as it does not involve the removal of existing housing.

Public Services. The proposed trail site is located within a national forest. There are no residential populations located at the project site and no community based public services in the immediate vicinity of the project. The project would not increase the need for fire or police protection services or create an adverse impact on those protection services. The project would not affect the number of students served by local schools, nor bring in new residents requiring the construction of additional schools. The project would not result in an increased number of residents or visitors in the area using community parks. The project is not expected to increase visitor use within the national forest. No other public facilities would be affected by the project.

Recreation. The EA (p. 29) evaluated potential impacts of the Mt. Hough Trails Project on recreation, concluding the project would result in improved recreation opportunities for motorcyclists, mountain bikers, hikers and equestrians and included adequate measures to minimize potential conflicts among user groups. No neighborhood or regional parks are located in the vicinity of project site, and none would be impacted by the proposed trail development. The project would not increase visitor use at the national forest such that new recreational facilities would be needed, nor would the project cause motorized recreationists to intensify uses on other facilities. The Mt. Hough Trails Project is likely to disperse advanced riders from the concentrated trails in the central Mt. Hough, Quincy, and Taylorsville area. The project would not have significant recreation impacts.

Transportation. The EA evaluated the impacts of the proposed trails on transportation in the context of recreation (p. 33) and cultural resources (p. 80) and determined the project would not cause adverse transportation impacts. The analysis did not address vehicle miles traveled or emergency access. The Mt. Hough Trails would serve existing trail recreation use and would shift some recreational uses within a national forest that is already very popular for motorized and non-motorized recreation. Any increase in vehicle trips to the project area associated with new trail development would be negligible. The trail is adjacent to the paved HWY 70; emergency access to or from the project area would not be affected. The project would not have significant transportation impact.

Tribal Cultural Resources. Although the Plumas National Forest consulted with interested tribes during the NEPA process, Assembly Bill (AB) 52 created a specific CEQA role for California Native American tribes by creating a formal consultation process and establishing that a substantial adverse change to a tribal cultural resource

has a significant effect on the environment. Tribal cultural resources are defined as:

1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

    A) Included or determined to be eligible for inclusion in the California Register of Historical Resources

    B) Included in a local register of historical resources as defined in PRC section 5020.1(k)

2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC section 5024.1 (c). In applying the criteria set forth in PRC section 5024.1 (c) the lead agency shall consider the significance of the resource to a California Native American tribe.

A cultural landscape that meets the criteria above is also a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. In addition, a historical resource described in PRC section 21084.1, a unique archaeological resource as defined in PRC section 21083.2(g), or a "non-unique archaeological resource" as defined in PRC section 21083.2(h) may also be a tribal cultural resource if it conforms with above criteria.

AB52 requires a lead agency, prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if:

> (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and
>
> (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.

Plumas County sent consultation notification letters on September 14, 2021 to Kyle Self of the Greenville Rancheria, of Maidu Indians. No response was received within the 30 days. Consistent with AB52, Plumas County can conclude the CEQA process with the AB52 consultation complete.

Utilities. The proposed project solely comprises a trail and would not require a water supply or generate waste beyond the small amount of trash generated by recreationists that is generally either packed out or deposited at trailheads trash receptacles. The project would not affect water, wastewater, energy, or other utilities.

Wildfire. USFS determined the Mt. Hough Trails project would not impact fire and fuels and did not require further analysis (EA p. 64). USFS consulted with CAL FIRE

when developing the Mt Hough-South Park EA; CAL FIRE did not provide comments. The proposed trail alignment is entirely within an area of federal fire protection responsibility but is immediately adjacent to state responsibility areas zoned very high fire hazard. Although the proposed trail would provide a new opportunity for motorized and non-motorized recreation, it would be constructed within an area that is already heavily used for recreation and other activities and traversed by trails and roads. The project would develop new trails at lower elevations on south facing slopes, which could be perceived as increasing fire risk. Due to the limited number of additional users, the existing trail and road density in the area, and adjacent roads allowing adequate ingress and egress, the proposed trail project would not cause a significant wildfire impact because it would not substantially impair emergency response or evacuation, would not exacerbate wildfire risks, would not require additional infrastructure, and would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes.

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Appendix A: Road Construction Emissions Model

Road Construction Emissions Model, Version 9.0.0

Daily Emission Estimates for -> Mt. Hough Trails Phase 2

Project Phases (Pounds)	ROG (lbs/day)	CO (lbs/day)	NOx (lbs/day)	Total PM10 (lbs/day)	Exhaust PM10 (lbs/day)	Fugitive Dust PM10 (lbs/day)	Total PM2.5 (lbs/day)	Exhaust PM2.5 (lbs/day)	Fugitive Dust PM2.5 (lbs/day)	SOx (lbs/day)	CO2 (lbs/day)	CH4 (lbs/day)	N2O (lbs/day)	CO2e (lbs/day)
Grubbing/Land Clearing	1.10	26.52	2.15	0.11	0.11	0.00	0.10	0.10	0.00	0.04	3,403.41	1.09	0.03	3,440.23
Grading/Excavation	0.19	4.13	0.34	0.02	0.02	0.00	0.02	0.02	0.00	0.01	546.36	0.16	0.01	551.37
Drainage/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Maximum (pounds/day)	1.10	26.52	2.15	0.11	0.11	0.00	0.10	0.10	0.00	0.04	3,403.41	1.09	0.03	3,440.23
Total (tons/construction project)	0.01	0.15	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.33	0.01	0.00	19.54

Notes: Project Start Year -> 2022
Project Length (months) -> 3
Total Project Area (acres) -> 13
Maximum Area Disturbed/Day (acres) -> 0
Water Truck Used? -> No

Phase	Total Material Imported/Exported Volume (yd³/day)		Daily VMT (miles/day)			
	Soil	Asphalt	Soil Hauling	Asphalt Hauling	Worker Commute	Water Truck
Grubbing/Land Clearing	0	0	0	0	60	0
Grading/Excavation	0	0	0	0	60	0
Drainage/Utilities/Sub-Grade	0	0	0	0	0	0
Paving	0	0	0	0	0	0

PM10 and PM2.5 estimates assume 50% control of fugitive dust from watering and associated dust control measures if a minimum number of water trucks are specified.
Total PM10 emissions shown in column F are the sum of exhaust and fugitive dust emissions shown in Column I are the sum of exhaust and fugitive dust emissions shown in columns J and K.
CO2e emissions are estimated by multiplying mass emissions for each GHG by its global warming potential (GWP), 1, 25 and 298 for CO2, CH4 and N2O, respectively. Total CO2e is then estimated by summing CO2e estimates over all GHGs.

Total Emission Estimates by Phase for -> Mt. Hough Trails Phase 2

Project Phases (Tons for all except CO2e. Metric tonnes for CO2e)	ROG (tons/phase)	CO (tons/phase)	NOx (tons/phase)	Total PM10 (tons/phase)	Exhaust PM10 (tons/phase)	Fugitive Dust PM10 (tons/phase)	Total PM2.5 (tons/phase)	Exhaust PM2.5 (tons/phase)	Fugitive Dust PM2.5 (tons/phase)	SOx (tons/phase)	CO2 (tons/phase)	CH4 (tons/phase)	N2O (tons/phase)	CO2e (MT/phase)
Grubbing/Land Clearing	0.00	0.09	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11.23	0.00	0.00	10.30
Grading/Excavation	0.00	0.06	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.10	0.00	0.00	7.43
Drainage/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Maximum (tons/phase)	0.00	0.09	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11.23	0.00	0.00	10.30
Total (tons/construction project)	0.01	0.15	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.33	0.01	0.00	17.73

PM10 and PM2.5 estimates assume 50% control of fugitive dust from watering and associated dust control measures if a minimum number of water trucks are specified.
Total PM10 emissions shown in column F are the sum of exhaust and fugitive dust emissions shown in Column I are the sum of exhaust and fugitive dust emissions shown in columns J and K.
CO2e emissions are estimated by multiplying mass emissions for each GHG by its global warming potential (GWP), 1, 25 and 298 for CO2, CH4 and N2O, respectively. Total CO2e is then estimated by summing CO2e estimates over all GHGs.
The CO2e emissions are reported as metric tons per phase.