Willits Rail with Trail Project

Initial Study/Mitigated Negative Declaration

City of Willits

24 March 2022

Willits Rail with Trail Project

Initial Study/Mitigated Negative Declaration

This document has been prepared for:

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March 24, 2022

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1. Project Information

Project Title	Willits Rail with Trail Project
Lead Agency Name & Address	City of Willits 111 E. Commercial Street Willits, CA 95490
Contact Person & Phone Number	Dusty Duley (707) 459-7124
Project Location	Willits, CA Between East Commercial Street to East Hill Road
General Plan Land Use Designation	M-G – Industrial General
Zoning	MH – Heavy Industrial

1.1 CEQA Requirements

The City of Willits (City), serving as the California Environmental Quality Act (CEQA) Lead Agency, has prepared this Initial Study to provide the public, responsible agencies, and trustee agencies with information about the potential environmental effects of the proposed Willits Rail with Trail Project (hereafter referred to as the "Project"). The Project as proposed would construct an approximately 1.6-mile Class I Trail (pedestrian and bicycle trail) from East Commercial Street to East Hill Road generally within the Great Redwood Trail Agency (GRTA) right of way (formerly the North Coast Railroad Authority [NCRA]), within the City limits.

The purpose of this Initial Study is to provide a basis for deciding whether to prepare an Environmental Impact Report, a Mitigated Negative Declaration, or a Negative Declaration. This Initial Study is intended to satisfy the requirements of CEQA (Public Resources Code [PRC], Div 13, Sec 21000-21177), and the State CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387). Section 15063(d) of the State CEQA Guidelines states the content requirements of an Initial Study as follows:

1. A description of the project including the location of the project;
2. An identification of the environmental setting;
3. An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
4. A discussion of the ways to mitigate the significant effects identified, if any;
5. An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and
6. The name of the person or persons who prepared or participated in the Initial Study.

1.2 Purpose and Need

The Willits Rail with Trail Project will construct a dedicated Class 1 bicycle and pedestrian facility that will provide a safe, Americans with Disabilities Act (ADA) compliant route for all active transportation users. As a benefit of the trail, the number of walking and bicycle trips, public health, safety, and mobility will increase. The City of Willits Bicycle and Pedestrian Specific Plan (City of Willits 2009) identifies the Project alignment as a portion of the GRTA Rail Trail, and as an important north-south link for bicyclists on the east side of town. Additionally, the Willits Safe Routes to School Action Plan identifies creating a Class I facility along the Railroad Avenue corridor, including Railroad Avenue.

1.3 Project Summary

The Project would construct an approximately 1.6-mile Class I Trail (pedestrian and bicycle trail) from East Commercial Street to East Hill Road within the GRTA right of way, within the City limits. Installation of this 1.6-mile trail would improve access and safety for pedestrian and bicycle users as well as create opportunities for nature study and recreation. The trail would include at-grade crossings, lighting, signage, benches, landscaping, and other features related to public access. The trail would provide a connection between the southern and the northern parts of the City, and it will be accessible to all of the residents that live and work in Willits. Further, the trail would eventually provide linkages beyond the City into parts of the County, the City of Ukiah, and beyond as part of the proposed Great Redwood Trail, which is planned to span between Eureka and the North Bay Area. It would also connect to the Haehl Creek Trail, located near the Frank R. Howard Memorial Hospital.

The trail would be a paved pathway Class I facility, approximately ten-feet wide (five feet per travel lane) with 2-foot shoulders. The trail may be narrowed in limited locations where unavoidable site constraints exist. For safety purposes, a fence a minimum of 42-inches in height would be constructed between the railroad and the trail. The fence would be discontinuous along the alignment, as to not obstruct street crossings or private property access. Fence openings would be placed for access to and from the rail for safety and maintenance purposes. The trail would be a minimum of ten feet from the railroad to meet GRTA design standards. The trail would include new bridge crossings over three creeks – Broaddus Creek, Baechtel Creek, and Haehl Creek.

It is assumed the railroad would remain active, with minimal levels of activity primarily associated with the Skunk Train rail excursion tours. The Project would not conflict with the Skunk Train rail excursion or other railroad use. Small areas of inactive track may be removed, primarily associated with grade crossings or inactive spurs. Existing street crossings may be enhanced with *California Manual on Uniform Traffic Control Devices* (CA MUTCD) standards, such as LED signs. Signage and markings at public street crossings would be updated as required by the California Public Utilities Commission (CPUC). Railroad crossings within City street crossing would remain unaltered, except when providing connections to existing pedestrian facilities (including curb, gutter and sidewalk) located adjacent to the trail.

The Project would be designed in accordance with GRTA (formerly NCRA) design standards and the Caltrans *Highway Design Manual, 7th Edition* (2020). In addition, the Project would be designed in accordance with other specific applicable standards, including the *California Manual on Uniform Traffic Control Devices* (CA MUTCD 2020) and the 2010 Americans with Disabilities Act Standards for Accessible Design.

1.4 Project Location

The Project would be located along the railroad corridor between East Commercial Street to East Hill Road within the GRTA right of way (Figure 1 – Vicinity Map). The Skunk Train Depot is located at the northern end of the trail alignment. The railroad corridor is bordered by residential, industrial, and open space uses (Figure 2-A through Figure 2-D – Study Boundary). Three creeks cross the trail alignment and include riparian vegetation. Broaddus Creek is the northernmost tributary within the Project Study Boundary; Baechtel Creek is the central tributary, and Haehl Creek is the southernmost tributary. Portions of the Project Area are included in the mapped FEMA Regulatory Floodway and/or the 100-year flood zone (Figure 3A – Figure 3D – FEMA Flood Zones).

1.4.1 Alignment Scenarios

The Project includes four alignment scenarios (Alignment A – Alignment D, Figure 4-A through Figure 4-D – Alignment Scenarios Map). All four alignment scenarios are located entirely within the Project Study Boundary, which has been divided into seven segments (Figure 4-A through Figure 4-D – Alignments Map). The seven segments include:

– Segment 1 – Willits Skunk Train Station at East Commercial Street to East Valley Street
– Segment 2 – East Valley Street to East San Francisco Avenue
– Segment 3 – East San Francisco Avenue to East Oak Street
– Segment 4 – East Oak Street to Access Road North

- Segment 5 – Access Road North to Access Road South
- Segment 6 – Access Road South to Shell Lane
- Segment 7 – Shell Lane to East Hill Road

Within the Project Study Boundary, different alignments scenarios will be selected for each segment. Thus, a combination of alignments scenarios, segment by segment, will compose the final trail alignment.

Alignment Scenario A

For all segments, Alignment Scenario A is a Rail with Trail design along the eastern edge of the Project Study Boundary, parallel to and separate from the eastern railroad track.

Alignment Scenario B

For all segments except Segment 4, Alignment Scenario B is a Rail with Trail design approach along the western side of the rail corridor. Within Segment 4, Alignment Scenario B departs from the railroad corridor and onto Railroad Avenue approximately between the Segment 5 boundary and East Barbara Lane, which avoids the need to construct a new bridge over Baechtel Creek. Ground disturbance on Railroad Avenue would not occur.

Alignment Scenario C

Alignment Scenario C is an alternative within Segments 1 and 4 only. In Segment 1, Alignment Scenario C departs the railroad corridor on East Valley Street and continues along Madden Lane to East Commercial Street. Ground disturbance would not occur, and the existing bridge on East Valley Street would not be modified. In Segment 4, Alignment Scenario C includes a Rail with Trail facility parallel to the western track. A new bicycle and pedestrian bridge would be constructed over Baechtel Creek.

Alignment Scenario D

Alignment Scenario D is an alternative within Segments 1 and 4 only. In Segment 1, Alignment Scenario D departs the railroad corridor on Pearl Street and continues along Madden Lane to East Commercial Street. Ground disturbance would not occur on Pearl Street or Madden Lane. In Segment 4, Alignment Scenario D departs from the western side of the railroad corridor and onto Railroad Avenue, approximately between East Barbara Lane and East Oak Street. Alignment Scenario D utilizes the existing vehicular bridge along Railroad Avenue. Ground disturbance on Railroad Avenue would not occur.

1.4.2 Project Elements

Project elements are summarized below.

Tree and Vegetation Removal

Tree and vegetation removal would occur as associated with the bridge crossings, as well as general clearing and grubbing within the Project Area. Please see Table 1 and Table 2 in Section 3.4 (Biological Resources) for additional information specific to removal of mature trees in the Project Area.

Grading and Fill

Grading would need to occur along the entire trail alignment to achieve accessible slopes and suitable trail width. Similarly, fill would be placed and compacted along the alignment to establish the trail prism.

Extend Existing Culvert and Install Headwall

Existing drainage structures such as culverts would be extended or upgraded as required, with or without headwalls, to promote drainage of the trail facility and ensure the railroad would not be adversely affected by Project-related drainage.

Crossing Improvements

The trail would be integrated into eight private and/or public existing at-grade crossings with bulb-outs/curb extensions, lighting, crosswalk enhancements, signage, and/or other improvements.

Construct Fence

For safety purposes, a fence a minimum of 42-inches in height would be constructed between the railroad and the trail. The fence would be discontinuous along the alignment, as to not obstruct street crossings or private property access. Fence openings would be placed for access to and from the rail for safety and maintenance purposes. Fencing would not be required between the railroad right of way and private property.

Construct Ancillary Trail Features

Ancillary trail features, such as lookouts or other nature viewing areas, would be constructed adjacent to the primary alignment. Ancillary trail features may include benches, interpretive signage, par course, and other features related to public access and education.

Bridges

Three new bridges would be constructed to span the three creeks within the Project Area. The bridges would be prefabricated steel truss bridges with span lengths of up to 120 feet (Image 1 – Conceptual Bridge Design). In-water construction in the three creeks would not occur.

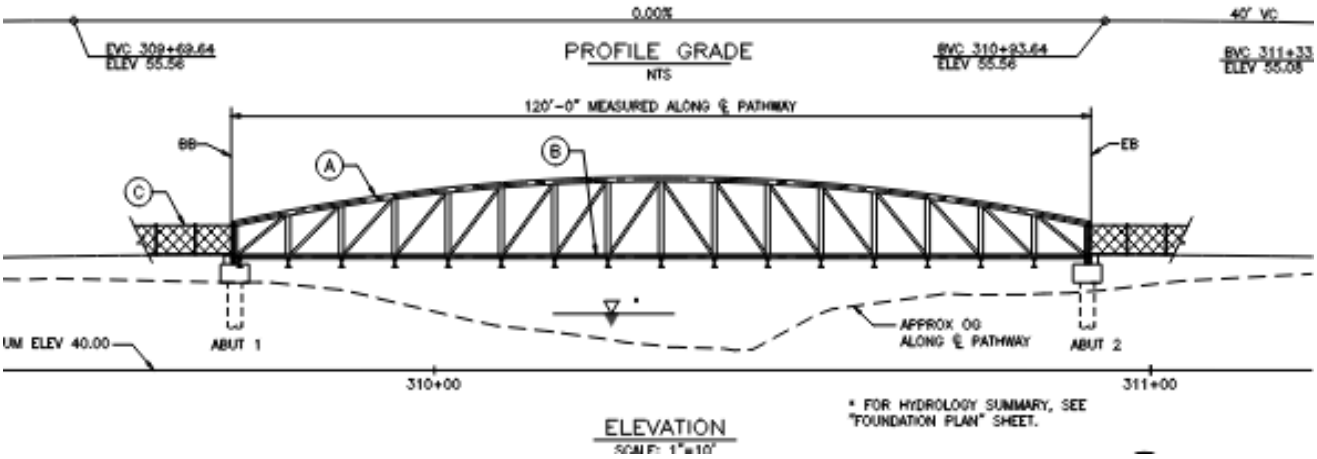

Image 1 Conceptual Bridge Design

Construct Retaining Walls and Bridge Foundations

Retaining walls are not expected along the trail alignment except at the new bridge crossings over the three creeks. The retaining wall or wing walls will be short and only installed to account for localized grading to support the trail. Excavation for the Project is likely to include footings for the retaining walls and the bridge foundation, which will be a traditional grade beam or drilled piles with a pile cap.

Drainage and Stormwater Improvements

The Project lies within the city limits and is currently not under an MS4 Permit. The Project would disturb more than one acre and is subject to the Construction General Permit Post-Construction requirements as regulated by the California State Water Board. The Project would meet the post-construction water balance requirements and would thus be exempt from post-construction stormwater Best Management Practices.

Site design measure for the Project would include planting new trees and protecting existing trees (where possible). Impervious area disconnection will also be used when possible and likely to be a natural condition of the Project. The trail would drain away from the existing rail, toward and existing storm drainage facility or natural drainage condition, crossing a pervious transition area before draining into the natural drainage.

Utility Relocation

Utility relocation may be required, most likely to occur at or near the street crossings due to the required pedestrian passive control system for crossing the roadway.

Striping and Signage

The trail will include required striping and signage in order to comply with California Manual on Uniform Traffic Control Devices (CA MUTCD) requirements. Striping and directional signage would indicate two travel directions. Signage to direct users to access the trail from other locations within the City (outside the Project Area) may also be incorporated. Interpretive signage along the trail would highlight the surrounding environment.

Trail Lighting

The Project would include lighting installation to improve safety in key locations. Any exterior lighting would be designed to protect wildlife and nighttime views, including views of the night sky. The Project would be designed to be consistent the recommendations of the International Dark-Sky Association, which includes standards for fixtures, shielding, wattage, placement, height, and illumination levels. To comply with these requirements, lighting for the Project would be the minimum lumens necessary, directed downward, shielded, and pedestrian level when feasible. This would ensure lighting is contained within the site and does not cause significant lighting and glare impacts for surrounding land uses and sensitive habitat areas.

Trailhead Development

Trailhead improvements would include signage, security cameras, striping for parking, and potentially additional trail amenities such as benches or picnic tables and landscaped plants and other features. Additional parking at either end of the trail is not proposed.

Off-Site Habitat Mitigation

Impacts to wetlands, Sensitive Natural Communities, and special status plants may require off-site habitat mitigation. If needed, off-site habitat mitigation would occur at one or more City-owned properties (see Figure 7, Potential Off-site Mitigation Properties). Potential off-site mitigation properties include City-owned lands near Haehl Creek Trail (APN 007-232-59), Willits Skate Park (APN 007-020-02), Haehl Creek subdivision (APN 007-232-60), Centennial Reservoir (APN 147-160-02), and in the vicinity of a former quarry (APNs 147-170-05 and 147-210-01).

1.5 Project Construction

1.5.1 Construction Schedule

Construction would occur within one to two construction seasons, commencing in November 2023 and continuing eight to twelve months. If feasible, vegetation clearing outside of the nesting bird season would occur first, by March 15 or after August 15. Construction hours would generally be limited to 7:00 a.m. to 6:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. on Saturdays. Construction would not occur on Sundays. Construction work windows would be scheduled to account for excursion rail usage and other railroad activities. Nighttime construction is not anticipated, however, the possibility for occasional nighttime work periods cannot be discounted. Based on the type and extent of work to be performed, it is conservatively assumed that construction could potentially require work for five nighttime periods. As portions of the Project Area overlap the FEMA 100-year flood zone, construction would not occur during flood conditions.

1.5.2 Construction Activities and Equipment

All construction activities would be accompanied by both temporary and permanent erosion and sediment control best management practices (BMPs). Project construction would include the following activities:

– Drilling – In support of potential retaining wall or bridge foundations.
– Crane – Bridge installation.
– Jackhammering – Site preparation/removal of existing material.
– Clearing, grubbing, and tree removal – To clear the trail alignment.
– Grading/Excavation – Throughout the Project Area to achieve grade and dimensions to accommodate the trail and bridges.
– Paving - Along the trail alignment.
– Fence installation – Along the trail alignment.
– Installation of RSP – In locations where concentrated stormwater discharge would occur or steep embankment slopes.
– Hauling – Transport of material to and from the Project Area.

Equipment required for construction would include drill rigs, concrete mixer and concrete pumping trucks, all terrain forklifts, snooper truck, compressors, tracked excavators, backhoes, graders, crane, bulldozers, dump trucks, skid steers, and pick-up trucks. Jackhammers or similar pieces of equipment may be necessary to support removal of existing material. It is not anticipated that any temporary utility extensions, such as electric power or water, would be required for trail construction. Water from legal sources would be used for dust control and compaction and re-vegetation.

Construction Access

The Project Area would be accessed via the GRTA railroad corridor via East Hill Road, Shell Lane, East Oak Street, East San Francisco Avenue, East Valley Street, Railroad Avenue, and East Commercial Street.

Establish Exclusion Areas and Erosion Control

Biological Studies have identified wetlands in and near the Project Area. Except for areas that would be unavoidably impacted during construction, resource areas to be protect would be excluded with protective fencing prior to construction. Erosion control BMPs would also be installed prior to construction.

Vegetation Removal

Vegetation and tree removal would be required. To minimize potential impacts to birds, vegetation could be removed prior to March 15 or after August 15 to avoid the nesting bird season. As discussed in Mitigation Measure BIO-4 Protect Special Status, Migratory and Nesting Birds, if vegetation removal or ground disturbance cannot be confined to work outside of the nesting season, a qualified ornithologist would conduct pre-construction surveys within the vicinity of the Project Area, to check for nesting activity of native and migratory birds and to evaluate the site for presence of raptors and special-status bird species. If active nests were detected within the construction footprint or within the construction buffer established by the Project biologist, the biologist would flag a buffer around each nest (see Section 10.4 – Biological Resources).

Stockpiling and Staging

Stockpiling and staging areas would be located on developed and/or paved areas and may be located outside the Project Area. Within the stockpiling and staging area, erosion control would be utilized to prevent materials and hazardous materials from impacting the environment, as required the Project's Stormwater Pollution Prevention Program (see Section 6.1.1 – Environmental Protection Action 1). Excess soils, aggregate road base, and construction materials would be stored on site within designated stockpiling and staging areas. Excess materials may

be re-used on site for backfill and finished grading. Excess materials would not be stockpiled on-site once the Project is complete. The contractor would haul additional excess materials off site for beneficial re-use, recycling, or legal disposal. Off-site spoiling would not occur.

Traffic and Access Control

Temporary lane closures of City streets may be required for crossing upgrades and would require traffic control.

Groundwater Dewatering

Groundwater dewatering is generally not expected but may be required. However, if needed, temporary groundwater dewatering would involve pumping water out of a trench or excavation. Groundwater would typically be pumped to a settling pond, Baker tanks (or other similar type of settling tank), or into a dewatering bag. Dewatering water may also be percolated back into the ground (in uplands). Discharge to regulated waters would not occur.

Site Restoration and Closure

Following construction, the contractor would demobilize and remove equipment, supplies, and construction wastes. The disturbed areas would be restored to pre-construction conditions or stabilized with a combination of grass seed (broadcast or hydroseed), straw mulch, rolled erosion control fabric, and other plantings/revegetation. If required, revegetation would include replanting and any potential compliance monitoring in support of mitigation required by resource agencies for impacts to regulated habitats such as wetlands or Sensitive Natural Communities.

1.6 Maintenance and Operation

The City would maintain and operate the Willits Rail with Trail as a City facility. Following construction, general operation and maintenance activities associated with the proposed Project would include annual inspections, trash/debris removal, vegetation management, upkeep of lights and fencing, repaving, and restriping. The entire alignment would be maintained by City staff on an as-needed basis to maintain the trail in good conditions and provide a safe environment for all trail users. The Project would include waste receptacles, spaces for recycling bins, and pet waste stations, to be maintained by the City. Trail maintenance is anticipated to require additional City Public Works Department staff. For the purposes of this Initial Study, the Project would create the equivalent of one to two new full-time employees.

1.7 Compliance with Existing Regulations and Standard BMPs

The Project will abide by the following regulations and industry-accepted Best Management Practices (BMPs) to reduce or avoid potential adverse effects that could result from construction or operation of the Project. In addition to these BMPs, mitigation measures are presented in the following analysis sections in Chapter 3, Environmental Analysis, to reduce potentially significant environmental impacts below a level of significance. The Project's Mitigation Monitoring and Reporting Program will include these actions to ensure implementation.

1.7.1 Environmental Protection Action 1 – Stormwater Pollution Prevention Plan (SWPPP)

The Project will seek coverage under State Water Resources Control Board (Regional Board) Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities. The City will submit permit registration documents (notice of intent, risk assessment, site maps, Storm Water Pollution Prevention Plan (SWPPP), annual fee, and certifications) to the Water Board. The SWPPP will address pollutant sources, best management practices, and other requirements specified in the Order. The SWPPP will include erosion and sediment control measures, and dust control practices to prevent wind erosion, sediment

tracking, and dust generation by construction equipment. A Qualified SWPPP Practitioner will oversee implementation of the Project SWPPP, including visual inspections, sampling and analysis, and ensuring overall compliance.

1.8 Regulatory Permits, CEQA, and NEPA

The City would be the CEQA lead agency for the Project. An Initial Study/Proposed Mitigated Negative Declaration is the proposed CEQA pathway. Given the lack of federal funds supporting the Project, NEPA is not required. It is anticipated that the Project would impact regulated Waters, including wetlands. The Project would require the following permits:

– U.S. Army Corps of Engineering (USACE) Clean Water Act (CWA) Section 404 permit
– North Coast Regional Water Quality Control Board (Regional Board) Section 401 Water Quality Certification
– California Department of Fish and Wildlife (CDFW) Streambed Alteration Agreement
– CDFW California Endangered Species Act (CESA) consistency

Given stream impacts may result from construction, formal or informal consultation with the National Marine Fisheries Service under Section 7 of the Endangered Species Act would occur. The Project is not expected to require consultation with the U.S. Fish and Wildlife Service, as potential impacts to federal special status plants or wildlife species are not anticipated.

1.9 Tribal Consultation

On December 2, 2021, the City of Willits sent the Middletown Rancheria of Pomo Indians and the Torres Martinez Desert Cahuilla Indians a tribal consultation invitation pursuant to Public Resources Code section 21080.3.1. A 30-day period allowing for a request for consultation ended with no request made for consultation. For additional information, please see Section 3.18 – Tribal Cultural Resources.

2. 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" as indicated by the checklist on the following pages. Where checked below, the topic with a "Potentially Significant Impact" would be addressed in an Environmental Impact Report:

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

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there would 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 would be prepared.

☐ I find that the proposed MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that 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 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.

Dusty Duley
Community Development Director
City of Willits

3-22-22
Date

3. Environmental Analysis

3.1 Aesthetics

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings? (Public Views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?		X		
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		X		

Views within the Project Area are limited to the industrial railroad corridor, roadside vegetation, and adjacent residences and are not considered scenic. The visual setting within the Project Area is described for each of the seven project segments. Within the Project Area corridor, views are dominated by the industrial railroad corridor, which is not considered scenic.

– **Segment 1 – Willits Skunk Train Station at East Commercial Street to East Valley Street**

  Industrial and commercial buildings border the northeast portion of Segment 1. Segment 1 includes the residences along Madden Lane, Pearl Street and East Valley Street. Segment 1 includes Broaddus Creek and associated riparian vegetation. Railroad tracks run north to south through the segment, including through the small Broaddus Creek riparian forest on the southern portion of the segment. The segment ends at the existing railroad crossing of East Valley Street.

– **Segment 2 – East Valley Street to East San Francisco Avenue**

  In Segment 2, Railroad Avenue parallels the western side of the railroad corridor and includes residential dwellings The eastern border includes industrial properties and buildings. Multiple railroad tracks run north to south through Segment 2. The rail corridor is mostly open with a mixture of low vegetation, grasses, gravel, and few trees.

– **Segment 3 – East San Francisco Avenue to East Oak Street**

  Railroad Avenue continues to parallel the railroad corridor in Segment 3 and includes residential dwellings. Industrial and commercial buildings, unpaved overflow parking areas, and sparse trees are visible along the eastern border. The railroad corridor runs north to south through the segment. The corridor is mostly open with a mixture of low vegetation, grasses, and gravel. Segment 3 ends at the East Oak Street railroad crossing.

- **Segment 4 – East Oak Street to Access Road North**

  Railroad Avenue continues to parallel the railroad corridor in Segment 4 and crosses Baechtel Creek via a flat bridge with metal guardrails with visible riparian vegetation. A fence borders the eastern industrial and commercial properties. The railroad corridor runs north to south through Segment 4. Segment 4 ends near Access Road North, which is a gravel railroad crossing.

- **Segment 5 – Access Road North to Access Road South**

  The railroad corridor splits in Segment 5; one line heads west and the other continues south. Vegetation partially screens the rail from the eastern industrial and commercial properties. Segment 5 ends at the existing railroad crossing on Access Road South.

- **Segment 6 – Access Road South to Shell Lane**

  The railroad corridor runs north to south through Segment 6 and is generally surrounded by low vegetation dominated by Himalayan blackberry and coyote brush and a grassy field to the west. The Valley Oak Sensitive Natural Community bisects the rail in the northern portion of the segment. To the east of the railroad is an informal trail adjacent to highly disturbed vegetation. Litter and debris are scattered throughout the segment. Industrial and commercial properties border the west. Highway 101 is to the east and visually separated from the rail corridor by vegetation, a fence, and a grassy roadside shoulder. Segment 6 ends at the existing railroad crossing on Shell Lane.

- **Segment 7 – Shell Lane to East Hill Road**

  Segment 7 continues with similar vegetation surrounding the railroad. The informal trail continues to parallel the rail. The railroad crosses Haehl Creek and associated riparian forest via a flat railroad bridge. The railroad bisects the Valley Oak Sensitive Natural Community in the southern portion of the segment. Industrial and commercial properties, residences, and grassy fields border west side of the segment. Highway 101 is to the east of the segment and separated from the rail corridor by vegetation, a fence, and a grassy roadside shoulder. The Project terminates at the existing railroad crossing on East Hill Road.

a) Have a substantial adverse effect on a scenic vista? (No Impact)

The City of Willits General Plan does not identify specific scenic vistas within its planning area. A scenic vista can generally be defined as a view that has remarkable scenery or a broad or outstanding view of the natural landscape. The visual setting of the Project is an industrially zoned railroad corridor and does not include scenic vistas per the general definition above. The residential streets included in some alignment scenarios also do not include scenic vistas. Therefore, construction and operation of the Project would have no effect on scenic vistas. No impact would result.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (No Impact)

The Project is not located on or within view of a state scenic highway. Route 20 is approximately 0.24 miles west of the Project and eligible for state scenic highway designation. However, Route 20 is visually independent from the Project corridor (Caltrans 2018), and is not officially designated state scenic highway. No impact would result.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings? (Public Views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (Less than Significant with Mitigation)

The City of Willits General Plan states that efforts should be taken to preserve aspects of the City's visual character including the wooded ridgelines around Little Lake Valley, the trains traversing the valley floor and mountains, and the City's riparian corridor and mature trees. The General Plan also acknowledges the need for enhancement of some

areas of its visual environment that are subjected to blight from past development and industry. The proposed Project would not substantially degrade the existing visual character or quality of public views, because the Project Area is located in an industrial corridor, with which the Project is visually compatible.

The Project is visually compatible with the railroad corridor. Removal of railroad track may occur but would be extremely limited. Aside from the required fencing, which would not be continuous, the Project does not include tall visual elements that would block public views. Constructed bridges would have a rustic aesthetic to match the visual character of the industrial corridor. Riparian tree removal would occur during construction and could result in a potentially significant impact. Replanting trees and other vegetation would be required per Mitigation Measure BIO-8. Vegetation removal would not occur within adjacent neighborhoods or residential areas. Proposed actions would not conflict with zoning and other regulations governing scenic quality within industrial zoned parcels. Overall, the Project is expected to enhance the visual character of the area by providing an aesthetically enhanced trail to allow pedestrian and bicycle mobility throughout the community as well as provide opportunities for nature study and recreation. By formalizing and controlling public use within the Project Area, existing visual impacts resulting from illegal use via transients and others would be reduced. With the incorporation of Mitigation Measure BIO-8 into the Project, the visual impact of vegetation removal is less than significant.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Less than Significant with Mitigation)

Street lighting currently exists along the major streets near the trail alignment and along the residential areas on Railroad Avenue. Existing sources of night lighting also include residential, commercial, or industrial uses adjacent to the trail alignment. The Project includes streetlight installation along the trail alignment to enhance visibility at night and existing street crossings may be enhanced with *California Manual on Uniform Traffic Control Devices* (CA MUTCD) standards, such as LED signs to improve pedestrian safety. Lighting would be designed to protect wildlife and nighttime views, including views of the night sky. This design goal would be satisfied using a variety of means as applicable, including fixture types, cut off angles, lamp arm extensions, and pole heights. Specific design preferences include directing light downward and away from other properties, avoiding brightly illuminated vertical surfaces where feasible, such as walls and lamp poles, and directing lighting away from sensitive habitat areas. With incorporation of the design considerations mentioned above, light emissions would be minimized. No proposed Project elements would cause substantial new sources of glare. Fencing would be constructed of low-glare material. Bridge crossings would be prefabricated steel truss bridges or similar low-glare material. Due to Project design considerations, potential light or glare impacts would be less than significant.

Nighttime construction is not anticipated, however, the possibility for occasional nighttime work periods cannot be completed discounted. Based on the type and extent of work to be performed, it is conservatively assumed that construction could potentially require work for five nighttime periods. Lighting would be needed for completion of any potential nighttime work. Although such lighting would be temporary, it may create a new source of light and glare on adjacent residences. The construction-related impact would therefore be potentially significant.

Mitigation

Mitigation Measure AES-1 would require implementation of measures to avoid glare in the event that nighttime construction is required for the Project.

Mitigation Measure AES-1: Avoid Glare and Light Trespass from Nighttime Construction Lighting

The City and its contractor shall prepare and implement a Nighttime Construction Lighting Plan for any nighttime construction work to avoid glare that would be a hazard to vehicles and to avoid light trespass onto adjacent residential uses. The lighting plan shall be developed to guide the use of lighting during project construction in such a way as to effectively light the work area while limiting light spill onto adjoining properties. This shall include the layout of lighting equipment necessary for all work to be completed at night and descriptions of hardware, including hoods, louvers, shields or other means to be used to control glare

and light trespass onto adjoining property. Lighting systems with flood, spot, or stadium type luminaires shall be aimed downward at the work. The recommendations contained in the Nighttime Construction Lighting Plan shall be incorporated into the final plans and specifications for the project and implemented during construction.

Implementation of Mitigation Measure AES-1 would reduce the potential impact of nighttime lighting to a less-than-significant level through implementation of measures to avoid glare that would be a hazard to vehicles and to avoid light trespass onto adjacent residential uses.

3.2 Agriculture and Forest Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

The Project Area is located along an urban, industrial zoned corridor in the City of Willits. There are no agricultural or forestry land uses or zoning within or adjacent to the Project Area. The Project Area consists of a grassy or vegetated railroad corridor adjacent to industrial or residential properties.

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland)? (No Impact)

Within the Project Area, there are no lands designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance identified by California Department of Conservation (California Department of Conservation 2021). Therefore, construction and operation of the Project would have no impact on farmland because no farmland exists in the Project Area.

b) Conflict with Agricultural Zoning or Williamson Act Contract? (No Impact)

There are no properties with agricultural zoning or properties enrolled in Williamson Act contracts within the Project Area. Zoning within the Project Area is discussed in Section 10.11 (Land Use and Planning) and is limited to industrial, commercial, and residential uses. Therefore, construction and operation of the Project would have no effect on agricultural zoning or Williamson Act contracts because none exist within the Project Area. No impact would result.

c, d) Conflict with Forest Land Zoning or Convert Forest Land? (No Impact)

There are no forest lands, timberland, or land zoned Timberland Production in the Project Area; therefore, no forest land or timberland would be converted to non-forest or non-timberland use. Zoning within the Project Area is discussed in Section 10.11 (Land Use and Planning) and is limited to industrial, commercial, and residential uses. No impact would result.

e) Convert Farmland or Forest? (No Impact)

The Project would include the removal of some trees; however, the trees that would be removed are predominantly riparian species or Valley Oak and not considered a forest resource. Trees removed because of the Project would be replanted, as required under Mitigation Measure BIO-8. There are no other changes in the existing environment caused by the Project that would impact farmland or forest land in or adjacent to the Project Area. No impact would result.

3.3 Air Quality

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?		X		
b) Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

The Project is located within the Mendocino County portion of the North Coast Air Basin, which is within the jurisdiction of the Mendocino County Air Quality Management District (MCAQMD). The MCAQMD monitors air quality, enforces local, State, and federal air quality regulations within its jurisdiction, inventories and assesses the health risks of Toxic Air Contaminants (TACs), and adopts rules that limit pollution.

Mendocino County is designated as a nonattainment area for the State particulate matter (PM_{10}) standard (ARB 2020). The sub-basin is in attainment for all other State standards and for all Federal criteria air pollutants (ARB 2020, U.S. EPA 2022). According to the MCAQMD's Particulate Matter Attainment Plan (MCAQMD 2005), the primary man-made sources of PM_{10} pollution in the North Coast Air Basin are wood combustion (woodstoves, fireplaces, and outdoor burning), fugitive dust, and automobile traffic. Some of the automobile emissions are the result of "pass-though" traffic on US Highway 101 because of its nature as the major transportation corridor in this part of the State.

PM_{10} refers to inhalable particulate matter with an aerodynamic diameter of less than 10 microns. PM_{10} includes emission of small particles that consist of dry solid fragments, droplets of water, or solid cores with liquid coatings. The particles vary in shape, size, and composition. PM_{10} emissions include unpaved road dust, smoke from wood stoves, construction dust, open burning of vegetation, and airborne salts and other particulate matter naturally generated by ocean surf.

On June 3, 2010, the MCAQMD Air Pollution Control Officer issued new CEQA guidance which requested that Planning agencies and consultants use the Bay Area Air Quality Management District (BAAQMD) CEQA Thresholds adopted on May 28th, 2010, to evaluate air quality impacts, with clarifications provided in 2013 (MCAQMD 2010, MCAQMD 2013). The last major revision of the BAAQMD thresholds was completed in May 2017.

The BAAQMD CEQA Thresholds were subsequently invalidated by a trial court because the BAAQMD itself did not do a CEQA evaluation of the Thresholds before their adoption. The Court, however, did not rule on or question the adequacy of the BAAQMD Air Quality CEQA Guidelines, including the impact assessment methodologies, or the evidentiary basis supporting the Thresholds, which are included in the Guidelines. Therefore, based on the evidence in the record, the City elects to utilize the BAAQMD's CEQA Thresholds, 2017 CEQA Guidelines, and screening guidance for the purposes of evaluating the Project's potential air quality impacts.

a) Conflict with or obstruct implementation of the applicable air quality plan? (Less than Significant with Mitigation)

This impact relates to consistency with an adopted attainment plan. The MCAQMD is responsible for monitoring and enforcing local, State, and federal air quality standards. Mendocino County is designated as a nonattainment area for the State particulate matter (PM_{10}) standard (ARB 2020). The sub-basin is in attainment for all other State standards

and for all Federal criteria air pollutants (ARB 2020, U.S. EPA 2022). Therefore, any use or activity that generates airborne particulate matter may be of concern to the MCAQMD.

To address non-attainment for PM_{10}, the MCAQMD adopted a Particulate Matter Attainment Plan in 2005 (MCAQMD 2005), which includes a description of local air quality, the sources of local PM emissions, and recommended control measures to reduce future PM levels. Control measures recommended in the Particulate Matter Attainment Plan include measures related to woodstoves, campgrounds, unpaved roads, construction and grading activities, new residential development, and open burning emissions.

The proposed Project would generate PM_{10} emissions during construction activities. Construction activities associated with the Project would include site preparation (e.g., demolition, clearing/grubbing), grading, excavation, bridge construction, and asphalt paving. The types of air pollutants generated by these activities are typically nitrogen oxides and particulate matter, such as dust and exhaust. Because construction activities could temporarily increase levels of PM_{10} in a region designated as non-attainment for PM_{10}, the impact is considered potentially significant. Therefore, Mitigation Measure AQ-1 would be incorporated to control construction-generated dust (PM).

Operation of the Project would not include the handling, transporting, or open storage of materials in which particulate matter may become airborne. Due to the absence of handling, transport, or open storage of materials that would generate particulate matter, operation of the Project is not expected to conflict with the MCAQMD's Particulate Matter Attainment Plan.

Mitigation

With implementation of Mitigation Measure AQ-1, construction activities would not conflict with or obstruct implementation of the Particulate Matter Attainment Plan Implementation of Mitigation Measure AQ-1 would reduce the potential impact related to PM_{10} fugitive dust to less than significant by incorporating dust control measures.

Mitigation Measure AQ-1: BMPs to Reduce Construction-period Air Pollution

To enhance enforcement of Rule 1-430(b) of the Mendocino County Air Quality Management District Regulations, the City of Willits and its Contractor shall implement the following airborne dust control and emission reduction measures during construction activities:

- All visibly dry disturbed soil road surfaces shall be watered to minimize fugitive dust emissions.
- All unpaved surfaces, unless otherwise treated with suitable chemicals or oils, shall have a posted speed limit of ten miles per hour.
- 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.
- Asphalt, oil, water, or suitable chemicals shall be applied on materials stockpiles and other surfaces that can give rise to airborne dusts.
- All earthmoving activities shall cease when sustained winds exceed 15 miles per hour.
- The operator shall take reasonable precautions to prevent the entry of unauthorized vehicles onto the site during non-work hours.
- The operator shall keep a daily log of activities to control fugitive dust.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points;
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation;

With implementation of Mitigation Measure AQ-1, construction activities would not conflict with or obstruct implementation of the 2005 Particulate Matter Attainment Plan. The impact following mitigation would be less than significant.

b) Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? (Less than Significant)

This impact is related to regional criteria pollutant impacts. As identified in impact "a" above, the Project is located in an area that is in attainment for all criteria air pollutants, except for PM_{10}. By its nature, air pollution is largely a cumulative impact, in that individual projects are rarely sufficient in size to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions may contribute to cumulative adverse air quality impacts.

The BAAQMD's CEQA guidelines and thresholds, which the MCAQMD uses as CEQA guidance, includes screening criteria to provide lead agencies with a conservative indication of whether a Project could result in potentially significant air quality impacts. According to the guidelines, if a project's characteristics (i.e., square footage, acreage, number of dwelling units) are less than associated screening criteria, then the lead agency does not need to perform a detailed air quality assessment of the Project's air pollutant emissions and a less-than-significant impact would occur (BAAQMD 2017).

Construction

For construction activities, screening criterions are recommended by the BAAQMD relative to air pollutant emissions (i.e., reactive organic gases [ROG], NO_X, $PM_{2.5}$, and PM_{10}), including a screening size for proposed land uses. For example, detailed air quality assessments are not required for construction of projects such as single-family residential developments comprised of less than 114 dwelling units, City parks that are less than 67 acres in size, and construction of office and commercial buildings that are less than 277,000 square feet (BAAQMD 2017).

The BAAQMD CEQA thresholds do not include specific screening size for trail or roadway improvement projects. However, when one compares the screening sizes established for the types of projects described above, it is reasonable to assume that the areal extent of construction activities associated with the trail project would be substantially less and would also not warrant a detailed air quality assessment. The Project, for example, would be conducted during one construction season (approximately eight to twelve months) and the total construction disturbance area is estimated to be approximately 2.7 acres – well below the screening criteria of 67 acres for City parks. Therefore, given the temporary nature of the Project's construction phase and the scale of the Project, it is not anticipated that construction activities would result in a cumulatively considerable net increase of PM_{10}. The short-term impact of the Project would be less than significant. Additionally, dust control measures required by Mitigation Measure AQ-1 would further minimize fugitive dust and emissions during construction.

Operation

Following construction, the Project would not include new stationary sources of air emissions. Vehicle trips associated with operation and maintenance of the trail would include annual inspections, trash/debris removal, vegetation management, repaving, and striping. Maintenance of the trail is anticipated to be performed by City staff.

Operation and maintenance of the Project would generate only infrequent trips. However, future larger repairs to trail may take several weeks to complete depending on the extent of damage and other circumstances. For reference, the BAAQMD operational criteria pollutant screening size for a city park is 2,613 acres.

The Project would not exceed the BAAQMD's operational criteria pollutant screening size, and would not result in substantial long-term operational emissions of criteria air pollutants. Therefore, Project-generated operational emissions would not result in a cumulatively considerable net increase of increase in PM_{10} emissions. The Project's contribution to a cumulative impact would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations? (Less than Significant)

Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardio-respiratory diseases. Residential uses are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Sensitive receptor locations include schools, daycares, playgrounds, retirement communities, nursing homes, medical facilities, and parks). Sensitive receptors within approximately one-quarter mile of to the Project Area include:

– Residences on Madden Lane and Pearl Street
– Residences on East Valley Street near the intersection of Railroad Avenue
– Residences along Railroad Avenue between East Valley Street and East Barbara Lane
– Willits High School, 22 N. Main Street, approximately 0.3 miles north of the northern trailhead
– Willits Elementary Charter School, 405 E. Commercial, approximately 0.1 miles east of the northern trailhead
– Sanhedrin High School, 120 N. Main Street, approximately 0.3 miles northwest of the northern trailhead
– Willits Charter School, 1431 S. Main Street, approximately 0.3 miles west of the trail
– Frank Howard Memorial Hospital, located proximal to the southern trailhead

The main pollutants of concern for this impact are diesel particulate matter (DPM). Construction equipment and heavy-duty truck traffic generate DPM exhaust. Project construction activities would occur over approximately eight to twelve months. Project construction is not expected to include intensive or prolonged construction equipment use for a long duration or in any one location along the 1.6-mile trail corridor. Equipment use would be spread out over a linear project alignment and construction activities would continually be shifting, further reducing the duration of equipment use near individual receptor locations. Due to the short duration (no one area of prolonged or intense construction activity), the Project would not result in the exposure of sensitive receptors to substantial pollutant concentrations. Therefore, the potential construction-related impact would be less than significant.

Following construction, the Project would not include new stationary sources of air emissions or a substantial increase in new mobile source emissions that would result in substantial long-term operational emissions of criteria air pollutants. Vehicle trips associated with operation and maintenance of the trail would include annual inspections, trash/debris removal, vegetation management, repaving, and striping. It is anticipated that Project operation and maintenance would generate minimal traffic trips, as motorized access would be limited to light maintenance, police, and emergency service vehicles. Maintenance of the trail is anticipated to be performed by City staff. As a benefit of the trail, the number of walking and bicycle trips will increase. Project operation could potentially reduce vehicle-miles-traveled and therefore emissions. Therefore, Project operation would not expose nearby sensitive receptors to substantial levels of pollutants. The operational impact would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Less than Significant)

The Project would create limited exhaust fumes from gas- and diesel-powered equipment during construction. The likelihood of these odors and emissions reaching nearby receptors is influenced by atmospheric conditions, specifically wind direction. Such odors would be temporary, occurring only during the construction period, and would disperse rapidly. Due to the relative short-term nature of construction, distribution of activities, and limited emissions or odors caused by construction, construction would not create objectionable odors affecting a substantial number of people and the temporary impact during construction would be less than significant. Additionally, implementation of the air quality control measures required by Mitigation Measure AQ-1 would further reduce odors released from construction equipment.

Following construction, operation of the trail would not result in major sources of odor or emissions. There would be no features included in the Project that would, by their nature or design, result in a new source of odors. No operational impact would result.

3.4 Biological Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?		X		
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		X		
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?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		X		
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?				X

The Project would involve the clearing and grubbing of vegetation within the footprint of the proposed trail pathway. Construction staging areas would be located on developed and/or paved areas and may be located outside the Project Area. Natural habitat is present within the Project Area, and baseline conditions include wetlands, creeks, and habitat for special status species as described below.

A Biological Resources Report (BRR) was prepared to evaluate baseline environmental conditions within the Project Area and to determine the potential for special status plants, wildlife species, or Sensitive Natural Communities (SNCs) to occur and is attached as Appendix B (GHD 2021a). Special status species include those that are federal- or State-listed under the federal or state Endangered Species Act (ESA; CESA), State fully protected (FP), State species of special concern (SSC), species on the California Department of Fish and Wildlife (CDFW) Special Animals List (SAL), or State rare, among others. Information in the BRR was compiled through a review of literature and database searches. Database searches encompassed nine U.S. Geological Survey (USGS) quadrangles (quads) centered on the Project Area quad (Willits) and the surrounding eight quads (Longvale, Willis Ridge, Brushy Mountain, Foster Mountain, Redwood Valley, Laughlin Range, Greenough Ridge, and Burbeck). Sources reviewed included the California Natural Diversity Database (CNDDB), California Native Plant Society (CNPS) Inventory of Rare and Endangered Vascular Plants, U.S. Fish and Wildlife Service - Information for Planning and Conservation (IPaC) tool, National Oceanic and Atmospheric Administration - Fisheries West Coast Region California Species List Tools. The BRR established a Biological Study Area (BSA) that included a 0.20-mile area around the Project Area footprint. A wildlife habitat assessment, field surveys for special status plants, and mapping of riparian habitat and SNCs occurred and is summarized in the BRR (see Appendix D of the BRR for an on-site species list of wildlife observed).

A delineation of aquatic resources (wetlands, creeks, etc.) within the Project Area footprint was conducted, and three-parameter wetlands and three seasonal water courses were observed. The Aquatic Resources Delineation report (GHD 2021b) is attached as Appendix C. All delineated wetlands and seasonal watercourses drain into Davis Creek, which drains to Outlet Creek, a tributary of the Eel River (a navigable waterway). Therefore, the wetlands and watercourses are USACE and Regional Board jurisdictional. The three watercourses include Broaddus Creek, Baechtel Creek, and Haehl Creek. The total area of three-parameter wetlands mapped within the Project Area was 118,994 ft^2 (2.7 acres) and the total area of the three watercourses (known as "Other Waters") mapped within the Project Area footprint was 13,861 ft^2 (0.32 acres). The total area of three-parameter wetlands and Other Waters encompasses 132,855 ft^2 or 3.05 acres, or 13% of the Project Area. Additionally, a tree survey was completed to inventory all trees with at least 12-inch diameter at breast height (dbh) that could be adversely impacted by the Project. The Tree Survey Report (GHD 2021c) is attached as Appendix D.

Habitat within the BSA is described as follows:

> *No high-quality natural habitat elements were observed within the PSB* (Project Study Boundary, which is the same as the Project Area)*. Habitat downstream of the PSB within Broaddus Creek was of higher quality. The PSB is largely urban scrub, with scattered cultivated trees and invasive plants. Observed habitat within the PSB included patches of Valley Oak (Quercus lobata) Woodland Alliance vegetation community (considered an SNC with a state ranking of S3), and three riparian areas surrounding the three intermittent tributaries that run across the PSB….*
>
> *A Tree Survey Report (GHD 2021c) was completed for the Project and included an inventory of tree species within the PSB. The report documented and tagged a total of 89 trees within the PSB. Notable naturally occurring large native trees within the PSB included eleven large valley oaks (Quercus lobata), a large California black oak (Quercus kelloggii), two large cottonwoods (Populus fremontii ssp. fremontii), and three large white alders (Alnus rhombifolia). The Broaddus Creek riparian corridor supported the highest concentration of medium and large white alders and the large cottonwoods within the PSB, and also contained arroyo willow (Salix lasiolepis), and Oregon ash (Fraxinus latifolia). Native riparian and oak trees are also clustered around Baechtel and Haehl Creek riparian corridors. The Baechtel Creek riparian corridor was characterized by white alder, arroyo willow (Salix lasiolepis), and Oregon ash, with invasive Himalayan blackberry (Rubus armeniacus) in the understory. The Haehl Creek riparian corridor was characterized by red alder (Alnus rubra) and arroyo willow, with invasive Himalayan blackberry in the understory. Valley oak woodlands near the southern extent of the PSB supported most of the medium to large valley oaks rooted within the PSB, and valley oak, California black oak (Quercus kelloggii), and willows were scattered throughout the PSB. A large coast redwood (Sequoia sempervirens) and large incense cedar (Calocedrus decurrens) also occur within the PSB near the East Valley Street intersection. Saplings and pole trees less than 12 inches DBH also occur throughout the PSB but were not inventoried. The PSB and BSA are not expected to provide high quality habitat for most sensitive biotic species (due to edge effects associated with development immediately adjacent); however, sensitive species may occur in the immediate vicinity and have potential to traverse the PSB and BSA.*

See Figure 5A through 5D for the locations of observed wetlands, and Other Waters, and Figure 6A through 6D for the locations of observed rare plants, riparian habitat and SNCs within the Project Area.

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? (Less than Significant with Mitigation)

Impact analysis in this section is based on the Project's BRR analysis. Sensitive and special status species and communities known to occur or have high potential to occur within the Project Area are identified below. The potential for special status species and communities to occur was determined by: (1) reviewing the current distribution of each species and whether it overlapped with the BSA; (2) reviewing the documented occurrence information from field surveys, CNDDB and other information sources (including Bat Acoustic Monitoring Visualization Tool [BatAMVT]

2021, Bumble Bee Watch 2021, eBird 2021, iNaturalist 2021); (3) comparing the habitat associations of each species with habitat quality and conditions in and adjacent to the Project Area (within the BSA), based on existing information (e.g., field surveys, elevation, aerial imagery); and (4) using qualified professional judgement to evaluate habitat quality and the relevance of occurrence data, or the lack thereof. Species or sensitive resources which are likely to be impacted as a result of the Project and require specific mitigation measures to lessen these impacts are further summarized below.

Construction-related impacts are discussed below. The construction of the Project is anticipated to impact special status wildlife species through noise, visual disturbance, and by physically disturbing or displacing habitat areas. In addition, wildlife species may potentially be permanently or temporarily displaced, injured, or killed, during habitat clearing and grubbing. Wildlife species may also be potentially injured or killed during earthmoving activities (i.e., crushing, burying, entrapment) or from being run over by construction equipment. Plant species may be potentially impacted during clearing and grubbing, equipment staging, and tree limbing or removal.

The operational phase of the Project has little potential to impact special status species because motorized vehicles would be prohibited on the trail, with the exception of periodic maintenance and emergency service vehicles, and use of the adjacent rail is expected to continue at the same frequency as currently used. Off-trail hiking and camping would also be prohibited. In addition, as described in Section 1.5 (Project Elements), proposed new lighting along the trail would be designed using wildlife-friendly practices (i.e., pointed downward and away from any natural habitat, etc.). The level of foot and bicycle traffic is expected to increase as compared to existing conditions, and associated noise and disturbance is anticipated to increase. However, as the trail would also be located directly adjacent to an active rail, which includes human use, wildlife has acclimated to the existing level of ambient noise. The increase in foot and bicycle traffic is not expected to result in a significant increase in baseline noise levels in the Project vicinity. Operational impacts would be less than significant.

Special-status Plant Species

Special status plant species include those listed as endangered, threatened, or as candidate species by the CDFW, under CESA, and/or under the federal ESA. Plant species on the California Native Plant Society's California Rare Plant Ranking (CRPR) Lists 1A, 1B and 2A and 2B are also considered eligible for State listing as endangered or threatened pursuant to the California Fish and Game Code (FGC); the CDFW has oversight of these special status plant species as a trustee agency. As part of the CEQA process, such species should be considered, as they meet the definition of threatened or endangered under Sections 2062 and 2067 of the California FGC. There are occasions where CRPR List 3 or 4 species might be considered of special concern particularly for the type locality of a plant, for populations at the periphery of a species range, or in areas where the taxon is especially uncommon or has sustained heavy losses, or from populations exhibiting unusual morphology.

The following protocol-level floristic surveys were conducted to support preparation of the Project's BRR and CEQA document:

– Floristic Surveys: spring survey: April 19 and 20th, 2021; summer survey: July 6th, 7th, and 8th, 2021, and late season follow up visit: October 6th, 2021. All surveys and the follow up site visit completed by GHD. Field surveys considered the list of special status plant species with potential to occur in the BSA as reported in Table 6.1 (pages 18-22) of the Project's BRR (Appendix B; GHD 2021a).
    - Associated Reports: Willits Rail with Trail Project Biological Resources Report (GHD 2021a); Willits Rail Trail Project Complete Botanical Surveys and Habitat Assessment (GHD 2021d)

Plants identified as semaphore grass were observed within the Project Area along the railroad easement during floristic surveys in two locations (Appendix A, Figure 6-C and 6-D). Semaphore grass was originally identified as North Coast semaphore grass (*Pleuropogon hooverianus*, CRPR 1B.1, State Threatened) but specimens also fit the description for Davy's semaphore grass (*Pleuropogon californicus* var. *davyi*, CRPR 4.3, limited distribution). Further coordination with CDFW is recommended in 2022 to confirm the plant's identity.

Additionally, during the July survey, a tarweed (*Hemizonia congesta*) population was identified on the southwestern end of the Project Area and was mapped as a potential rare or limited-distribution subspecies. However, an additional follow-up investigation of the late-blooming species on October 6th, when the population was in bloom and beginning to drop fruit, showed that the plant had many nearly sessile heads on lateral branches and wide fruits exceeding the size range of rare subspecies. The identity of the tarweed has since been updated based on this additional information to Cleveland's tarweed (*Hemizonia congesta* ssp. *clevelandii*), which is a common, non-special status species.

No other potential special status plants were observed within the Project Area during the protocol-level surveys completed by GHD in 2021.

As mentioned above, one plant specimen was identified as either being North Coast semaphore grass, a state-listed (threatened) species, or Davy's semaphore grass, which is a limited distribution CRPR 4.3 species. Further coordination with CDFW is recommended to confirm the identity of the specimen within the area it was observed. Regardless of the species identification, Project design should avoid the area where the specimen was collected, if feasible. If the species is the state listed North Coast semaphore grass, and avoidance is not feasible, then compliance with CESA would be required, which would likely include an incidental take permit authorization from CDFW and associated mitigation at a ratio to be determined in coordination with CDFW.

The following mitigation measures are proposed to reduce potential significant impacts to special status plants.

Mitigation

Mitigation Measures BIO-1 and BIO-2 would reduce the potential impact of the Project on special status plants to a less-than-significant level by the below-listed actions.

Mitigation Measure BIO-1: Protect Potential North Coast Semaphore Grass

Coordination with CDFW shall occur in 2022 to determine the semaphore grass specimen observed during the 2021 botanical survey (conducted in April and July 2021), which is believed to be either North Coast semaphore grass (CESA threatened) or Davy's semaphore grass (limited regional distribution CRPR 4.3). If the specimen is a CESA-listed species, appropriate consultation, compliance, and mitigation shall be achieved in coordination with CDFW. A Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared in coordination with jurisdictional permitting agencies and shall meet specific success criteria for CESA listed species.

The HMMP shall be acceptable to jurisdictional permitting agencies and include the following elements: proposed mitigation ratios; description and size of the restoration or compensatory area; site preparation and design; plant species; planting design and techniques; maintenance activities; plant storage; irrigation requirements; success criteria; five-year monitoring schedule; reporting plan and schedule; and remedial measures. The Plan shall be implemented by the City. If the species is considered special status (and not CESA listed), it will be avoided as much as feasibly possible. If needed, off-site habitat mitigation may occur at one or more suitable City-owned properties (see Figure 7, Potential Off-site Mitigation Properties).

Mitigation Measure BIO-2: Protect Special Status Plants

If more than three years pass between the existing botanical survey (first survey completed in April 2021 and second survey completed in July 2021), then the Project Area shall be re-surveyed for special-status plant species prior to construction occurring. Up to two surveys may occur and shall be completed during the appropriate blooming time (spring and/or summer) for the target species prior to construction.

If surveys determine that special status species (CRPR 1 or 2, or CRPR 3 or 4 species with regionally limited distribution) are present within the PSB, these plants shall be avoided to the extent feasible. If avoidance is not feasible, they shall be conserved by measures appropriate for the individual species which may include methods such as plant relocation, seed collection and/or nursery plant propagation for reestablishment in suitable habitat as close to the impact as is feasible. A restoration and monitoring plan to meet specific success criteria for reestablished plants shall be developed in coordination with CDFW.

With inclusion of Mitigation Measures BIO-1 and BIO-2, potential impacts to special status plants will either be avoided or minimized. If the Project cannot avoid North Coast semaphore grass or other special status plant species, then a plan for mitigation such as plant relocation, seed collection, nursery propagation and reestablishment in suitable habitat with appropriate monitoring shall be developed in coordination with CDFW.

Special Status Mammals

The Project centers around an existing railroad track, and is predominantly surrounded by commercial and residential development, with some areas of fallow open land that may be utilized for agricultural production. Suitable habitat for special status mammals is primarily limited to narrow aquatic and riparian corridors associated with Broaddus, Baechtel and Haehl Creeks. Valley oak, California black oak (*Quercus kelloggii*), and willows are scattered throughout the Project Area. The Project Area and BSA are not expected to provide high quality habitat for most sensitive biotic species (due to edge effects associated with development immediately adjacent); however, sensitive species may occur in the immediate vicinity and have potential to traverse the Project Area and BSA.

No special status mammal species were observed in the Project Area during reconnaissance level surveys or technical surveys; however, focused wildlife surveys were not conducted in the Project Area. The BRR did not identify any special status mammalian species with moderate or high potential to occur in the Project Area based upon baseline conditions.

It is expected that common, anthropogenically adapted mammalian wildlife species would be most likely to thrive in the Project Area (e.g., Raccoons [*Procyon lotor*], Striped Skunks [*Mephitis mephitis*], Black-tailed Deer [*Odocoileus hemionus columbianus*], etc.). Given the existing rail development and associated habitat fragmentation along the trail alignment, mammals that require large home ranges of undisturbed habitat are not likely to occur and any potential impact would be less than significant.

Special Status Bats

Habitat for bats (tree cavities, loose bark, riparian forest, creek crossing rail infrastructure, etc.) is present in the Project Area (based on site visits). Trees and vegetation in the Project Area may provide habitat for a variety of bat species. Construction of the Project may adversely impact special status bat species through the removal or modification of trees and/or vegetation, ground disturbance, as well as potential noise disturbance. Although special status bats were not observed within the Project Area during reconnaissance level surveys or technical surveys, survey methods were not designed to detect these species. However, the BRR did note the special status Townsend's Big-eared Bat (*Corynorhinus townsendii*) as having moderate potential to occur in the Project Area based on existing habitat, recent nearby records from 2015, and a consideration of the species' natural history. However, it should be noted that this species is most common in mesic (wet) sites and is extremely sensitive to human disturbance. Given the dry climate and existing (but infrequently utilized) rail service within the Project Area, although this species has moderate potential to occur, it is unlikely to be abundant in the Project Area. If construction of the Project were to harm or displace a special status bat species, a potentially significant impact would occur.

Project operation would include new sources of light; however, new street lighting would be designed to be consistent the recommendations of the International Dark-Sky Association, which includes standards for fixtures, shielding, wattage, placement, height, and illumination levels. To comply with these requirements, lighting for the Project would be the minimum lumens necessary, directed downward, shielded, and pedestrian level when feasible. With incorporation of the design considerations, operational impacts to special status bats would be less than significant.

To reduce potential impacts on this species and other special status bats that may occur in the Project Area, the following mitigation measure would be incorporated into the Project.

Mitigation

Mitigation Measure BIO-3 would reduce the potential impact of the Project on special status bats to a less-than-significant level by the below-listed actions.

Mitigation Measure BIO-3: Protect Special Status Bats

The City shall implement the following measures to protect special status bats.

- To the extent practical, remove trees only during seasonal periods of bat activity (when bats are volant, i.e., able to leave roosts) between March 1 and April 15 or September 1 and October 15, when evening temps rise about 45 F, and when no rainfall greater than ½ inches has occurred in the last 24 hours.
- If trees or structures cannot be removed during the volant period, (i.e., Project activities occur during the bat maternity season which generally occur April 16th through August 30th), a qualified bat biologist shall conduct surveys within suitable habitat for special status bats. Survey methodology shall include visual examination with binoculars and may optionally utilize ultrasonic detectors to determine if special status bat species utilize the vicinity.
  - Surveys shall be conducted by a qualified biologist within seven days prior to construction in any areas where potential maternity roosts may be disturbed/removed. The preconstruction surveys for bats may coincide with pre-construction surveys for other animals.
  - Surveys shall include a visual inspection of the impact area and any large trees/snags with cavities or loose bark or crevices within infrastructure. If the presence of a maternity roost is confirmed, an appropriate buffer distance would be established in consultation with CDFW to ensure that construction noise would remain below disturbance thresholds for bats. If no bat utilization or roosts are found, then no further study or action is required. If bats are found to utilize the Project Area, or presence is assumed, a bat specialist should be engaged to advise the best method to prevent impact.
- Project-related lighting shall be minimized if any construction occurs at night, either contained within structures or limited by appropriate reflectors or shrouds and focused on areas needed for safety, security, or other essential requirements.

With inclusion of mitigation measure BIO-3, potential impacts to special status bats would either be avoided or minimized.

Special Status and Migratory Birds

No special status avian species were observed in the Project Area during reconnaissance level surveys or technical surveys; however, focused avian surveys were not conducted in the Project Area. The BRR identified that suitable nesting and/or foraging habitat for several migratory nesting bird species (protected under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code) is present within the Project Area, and that nesting birds are expected to be present in the Project Area during the nesting season (March 15 through August 15). A review of recent (October 2021) CNDDB and eBird records from the immediate Project vicinity indicate that the following species have moderate or high potential to occur based on existing habitat, recent nearby records, and a consideration of the species' natural history:

– White-tailed Kite (*Elanus leucurus*; FP) – moderate potential,
– Willow Flycatcher (*Empidonax traillii*; SE) – moderate potential,
– Yellow-breasted Chat (*Icteria virens*; SSC) – high potential,
– Purple Martin (*Progne subis*, SSC) – moderate potential,
– Yellow Warbler (*Setophaga petechia*, SSC) – high potential.

If present in the Project Area during construction activities, special status and protected migratory birds may be injured or killed via clearing and grubbing of vegetation or limbing and removal of trees, and/or potentially displaced from habitat, resulting in a significant impact. Potential Project-related impacts to special status and protected migratory birds (if any) would be reduced to a less-than-significant level through the implementation of Mitigation Measure BIO-4.

Mitigation

Mitigation Measure BIO-4 would reduce the potential impact of the Project on special status and protected migratory birds to a less-than-significant level by the below-listed actions.

Mitigation Measure BIO-4: Protect Special Status, Migratory and Nesting Birds

- Ground disturbance and vegetation clearing shall be conducted, if possible, during the fall and/or winter months and outside of the avian nesting season (which is generally assumed to occur between March 15 – August 15) to avoid any direct effects to special-status and protected birds. If ground disturbance or vegetation clearing cannot be confined to the fall and/or winter outside of the nesting season, a qualified ornithologist shall conduct pre-construction surveys within the PSB and immediate vicinity, to check for nesting activity of native birds and to evaluate the site for presence of raptors and special status bird species. The ornithologist shall conduct at minimum a one-day pre-construction survey within the seven-day period prior to vegetation removal and ground-disturbing activities. If ground disturbance and vegetation removal work lapses for seven days or longer during the nesting season, a qualified ornithologist shall conduct a supplemental avian pre-construction survey before project work is reinitiated.
- If active nests are detected within the construction footprint or immediately adjacent to construction activities within the Project Area, the ornithologist shall flag a buffer around each nest. Construction activities shall avoid nest sites until the ornithologist determines that the young have fledged or nesting activity has ceased. In general, the buffer size for common species would be determined on a case-by-case basis in consultation with the CDFW and, if applicable, with USFWS. Buffer sizes would consider factors such as (1) noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity; (2) distance and amount of vegetation or other screening between the construction site and the nest; and (3) sensitivity of individual nesting species and behaviors of the nesting birds.
- If an active nest is found, the qualified ornithologist would determine the extent of an appropriate construction free buffer zone to be established around the nest and/or operational restrictions in consultation with the CDFW. Buffer zones would be delineated with flagging and maintained until the nests have fledged or nesting activity has ceased. Buffer sizes would take into account factors such as: (1) highway and other ambient noise levels, (2) distance from the nest to the highway and distance from the nest to the active construction area, (3) noise and human disturbance levels at the construction-site at the time of the survey and the noise and disturbance expected during the construction activity, (4) distance and amount of vegetation or other screening between the construction-site and the nest, and (5) sensitivity of individual nesting species and behaviors of the nesting birds.

With the implementation of Mitigation Measure BIO-4, potential impacts to special status and protected migratory birds would be less than significant.

Willow Flycatcher, a CESA-listed species, was found to have moderate potential to occur within the PSB and BSA. The Project will include removal of riparian vegetation prior to completion of nesting in riparian corridors, generally by August 15. If this species were to be harmed, harassed, displaced, or killed by the Project, a significant impact would occur. To determine whether this species is present, and potential associated future protective measures, Mitigation Measure BIO-5 is proposed.

Mitigation Measure BIO-5: Protect Willow Flycatcher

- If riparian vegetation near Broaddus Creek, Baechtel Creek, and/or Haehl Creek is removed prior to August 15, a non-protocol survey will be implemented to evaluate Willow Flycatcher habitat within the riparian disturbance area(s). If an active nest is found, the qualified ornithologist would determine the extent of an appropriate construction free buffer zone to be established around the nest and/or operational restrictions in consultation with the CDFW. Buffer zones would be delineated with flagging and maintained until the nests have fledged or nesting activity has ceased. Buffer sizes would take into account factors such as: (1) highway and other ambient noise levels, (2) distance from the nest to the highway and distance from the nest to the active construction area, (3) noise and human disturbance levels at the construction-site at the time of the survey and the noise and disturbance expected during the construction activity, (4) distance and amount of vegetation or other screening between the construction-site and the nest, and (5) sensitivity of individual nesting species and behaviors of the nesting birds. Removal of riparian vegetation after August 15 will not require pre-construction Willow Flycatcher surveys.

With inclusion of Measure BIO-5, the presence or absence of suitable Willow Flycatcher habitat would be determined, which would inform the appropriate pathway for CESA review, and avoid or reduce potential significant impacts to be less-than-significant.

Special-status Amphibian and Reptile Species

Several special status amphibians and one reptile were found to have a moderate or high potential to occur within the PSB. The proposed bridge installations across Broaddus, Baechtel and Haehl Creeks have the potential to crush or bury amphibian and reptile species, adversely affect water quality (habitat), or mask species calls due to elevated noise (some species call during both the day and night). No dewatering is proposed to facilitate bridge installation. Identified special status amphibians and reptiles have the potential to utilize creek channels, wetland habitats or grasslands within the Project Area. To protect special status amphibians and reptiles, the following mitigation is recommended for inclusion to avoid or reduce potential Project-related impacts to be less than significant.

Mitigation Measure BIO-6: Protect Special Status Amphibians and Reptiles

No more than one week prior to commencement of ground disturbance within 50 feet of suitable reptile and/or amphibian habitat (e.g., creeks, riparian areas, wetlands, damp meadows), a qualified biologist shall perform a pre-construction survey for Western Pond Turtles, Northern Red-legged Frogs, Foothill Yellow-legged Frogs, or Red-bellied Newt and shall relocate any individuals or egg masses that occur within the work-impact zone to nearby suitable habitat.

If a Western Pond Turtle, Northern Red-legged Frog, Foothill Yellow-legged Frog or Red-bellied Newt (or other special status amphibian or reptile) is observed in an active construction zone, the contractor shall halt construction activities in the immediate area where observed, and the individual shall be moved to a safe location with similar habitat outside of the construction zone.

With inclusion of mitigation measure BIO-6, potential impacts to special status amphibians or reptiles would either be avoided or minimized, resulting in a less than significant impact.

Special Status Fish

No in-water work or dewatering is proposed as part of this Project, however construction over and within 100 feet of Broaddus, Baechtel and Haehl Creeks would occur during bridge installations which are proposed under Alignment A. Should bridge installations occur, implementation of BMPs to reduce erosion, dust, and potential for polluted run-off into Broaddus, Baechtel and Haehl Creeks would be implemented to minimize impacts to fish and aquatic resources.

Mitigation

Mitigation Measure BIO-7 is recommended for implementation to reduce potential impacts to water quality and wetlands to be less than significant.

Mitigation Measure BIO-7: Protection of Water Quality and Wetlands

The following activities shall be implemented during construction:

- Erosion control measures shall be included on the 100% design plan set for areas of ground disturbance in and adjacent to Waters of the U.S. and State. Erosion control measures shall be implemented to reduce potential water quality degradation, dust, or erosion to areas adjacent to construction activities.
- Exclusion fencing shall be installed around the three creeks, and wetlands and SNCs to be avoided. The exclusion fencing locations shall be included on the 100% design plan set for construction.
- Equipment shall be cleaned of deleterious materials before being delivered to the job site.
- Equipment shall be staged and materials shall be stockpiled outside riparian habitat and wetlands.
- Refuelling shall not occur within 100 feet of Waters of the U.S. or State.
- Impacts to herbaceous cover shall be offset by reseeding any unvegetated and impacted areas with a suitable seed mixture post-construction.
- Fueling trucks shall always be equipped with sealed spill kits.
- Spill containment booms shall be available on-site at all times during construction, staging of equipment or fueling when work occurs over live waterbodies (such as during bridge installations).
- Any construction equipment operating adjacent to or over a stream shall be inspected daily for leaks. Any oil, fuel, and grease residue that has the potential to fall from machinery shall be removed and properly disposed of.

With incorporation of Measure BIO-7, impacts to special status fish and aquatic habitat (wetlands) would be avoided or minimized.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (Less than Significant with Mitigation)

Riparian Habitat

Riparian areas are those vegetated areas adjacent to rivers, streams, and lakes with specific overstory and/or understory plant species that meet the definition of riparian by the CDFW. Riparian habitat is important to stream health and watershed function due to the runoff and nutrients it filters, cooling effect it has on water temperatures, input of wood and organic debris which acts as strata for macroinvertebrates (one of the fundamental blocks of a healthy food web for many aquatic species), channel structure and input of woody debris to enable natural geomorphological changes. The Project Area includes three stream crossings at Broaddus, Baechtel and Haehl creeks. Work in or around the three creeks may involve removal or trimming of riparian habitat (trees and shrubs) to enable access for equipment, and/or for bridge installations.

Riparian vegetation was mapped at the canopy drip line and characterized using the Rapid Assessment method. Although the riparian vegetation communities are not considered SNCs based on State Rank, they may be regulated by the City, CDFW, or the Regional Water Board. The datasheets used to characterize the riparian communities (as well as other biological resources) are included as appendices to the BRR which is attached as Appendix B.

Broaddus Creek Riparian Community

The Broaddus Creek riparian corridor crosses under the northern portion of the Project Area and runs alongside the northeastern portion of the rail corridor for approximately 450 feet (Appendix A, Figure 6-A). The riparian canopy was dominated by white alder (*Alnus rhombifolia*) with cottonwood (*Populus fremontii* ssp. *fremontii*), arroyo willow, and

Oregon ash. West of the bridge over Broaddus Creek, the riparian area was invaded by black locust (*Robinia pseudoacacia*, Cal-IPC Limited). The riparian vegetation community is classified as White Alder Woodland Alliance (S4). The Broaddus Creek riparian canopy covers approximately 27,112 sq. ft (0.62 acres) of the Project Area.

Baechtel Creek Riparian Community

The Baechtel Creek riparian corridor crosses the central portion of the Project Area (Appendix A, Figure 6-B). The riparian canopy was similarly characterized by white alder, arroyo willow, and Oregon ash, with invasive Himalayan blackberry in the understory. The riparian vegetation community is classified as White Alder Woodland Alliance (S4). The Baechtel Creek riparian canopy covers approximately 7,558 sq. ft (0.17 acres) of the Project Area.

Haehl Creek Riparian Community

The Haehl Creek riparian corridor crosses the southern portion of the Project Area (Appendix A, Figure 6-C). The riparian canopy was characterized by red alder (*Alnus rubra*) and arroyo willow, with invasive Himalayan blackberry in the understory. Red alder was distinguished from white alder by the presence of rolled-under leaf margins, double serration, and more acute leaf tips (Baldwin et al. 2012). The Haehl Creek riparian vegetation community is classified as the Red Alder Forest Alliance (S4) which is therefore not considered an SNC (SNCs are ranked S1, S2 or S3). The Haehl Creek riparian canopy covers approximately 10,400 sq. ft (0.24 acres) of the Project Area.

Sensitive Natural Community Habitat

The valley oak woodland alliance is considered an SNC, and is defined by dominant presence of valley oak (>50% relative cover) with an open canopy (greater than 10%) to continuous, or savanna-like (less than 10%, but evenly distributed); shrub layer is sparse to open, with a grassy herbaceous layer (Sawyer et al. 2009). It is considered an SNC because this vegetation alliance is ranked as “vulnerable” (S3). There are two locations of this SNC which comprises 1.9 acres of the Project Area **(**Appendix A, Figure 6-B, 6-C, and 6-D).

The valley oak woodland areas are separate from the riparian habitat and no overlap exists. It is anticipated that a portion of the valley oak woodland alliance (SNC) will be adversely affected during construction due to vegetation removal for trail and bridge installation. The two mapped locations of valley oak woodland alliance are further described below.

Valley Oak SNC Location 1

Location 1 of the valley oak woodland alliance SNC was observed in approximately the center of the Project Area from north to south, just south of Baechtel Creek. Location 1 spans either side of the railroad for approximately 750 feet and then extends on the east side of the railroad within the Project Area for approximately another 400 feet (Appendix A Figure 6-B and 6-C). This SNC contained a tree canopy cover of 24% valley oak, 10% arroyo willow, and 1% Oregon ash. The canopy contained a greater density of valley oak on the north side of the SNC and less dense along the south side, where trees are semi-evenly distributed with an open canopy and semi dense understory. Associated understory vegetation included shrub cover of 20% smooth dogwood (*Cornus glabrata*), 7% Himalayan blackberry, 5% coyote brush (*Baccharis pilularis*), and 5% poison oak (*Toxicodendron diversilobum*). The herbaceous layer primarily comprised of 10% ripgut brome (*Bromus diandrus*). The SNC in Location 1 comprises 56,321 square feet (1.29 acres), or 5% of the Project Area.

Valley Oak SNC Location 2

Location 2 of the valley oak woodland alliance SNC was observed in the southern most portion of the Project Area **(Appendix A Figure 6-D).** This SNC contained a tree canopy cover of 35% valley oak. The SNC is influenced by the riparian zone at northern portion of Location 2 and contains a higher canopy cover. In the southern portion of SNC Location 2, the trees are influenced by a drier habit, and are a part of an SNC that extends outside of the Project Area. Associated understory vegetation included a shrub layer of 20% poison oak, 7% Himalayan blackberry, 5% coyote brush, and 3% smooth dogwood. Herbaceous cover contained 22% iris leaved rush (*Juncus xiphioides*), 4% pennyroyal (*Mentha pulegium*), 3% broad-leafed sweet pea (*Lathyrus latifolius*), and 2% of each of the following:

common rush (*Juncus patens*), tall fescue (*Festuca arundinacea*), tall flatsedge (*Cyperus eragrostis*), and blue wild rye (*Elymus glaucus*). The SNC in Location 2 comprises 26,357 square feet (0.61 acres) or 2.6% of the Project Area.

Mature Trees

Approximately 89 mature trees, which is a tree considered to have a 12-inch diameter at breast height (dbh) or greater, are within the Project Area. An arborist inventory was conducted to document the type and size of mature trees within the Project Area, and thus includes trees found throughout the entire study boundary, including both riparian and valley oak woodland alliance SNC habitats. See Table 1 for the results of trees found within the Project Area.

Table 1 Mature Trees within the Project Area

Species	Status	Size Classes (inches at dbh)	Number of Trees
Aleppo pine (*Pinus halepensis*)	Non-Native	Small (12-17”)	2
Arroyo willow (*Salix lasiolepis*)	Native, Riparian	Small (12-17”)	1
Black locust (*Robinia pseudoacacia*)	Non-Native	Small (12-17”)	4
		Medium (18-23”)	1
California black oak *(Quercus kelloggii*)	Native	Small (12-17”)	5
		Medium (18-23”)	1
		Large (≥ 24”)	1
Coast redwood (*Sequoia sempervirens*)	Native (Planted)	Medium (18-23”)	3
		Large (≥ 24”)	1
Cottonwood (*Populus fremontii* ssp*. fremontii*)	Native, Riparian	Large (≥ 24”)	2
Incense cedar (*Calocedrus decurrens*)	Native (Planted)	Large (≥ 24”)	1
Northern California black walnut (*Juglans hindsii*)	Native (Likely Planted)	Small (12-17”)	1
Oregon ash (*Fraxinus latifolia*)	Native	Small (12-17”)	4
		Medium (18-23”)	1
Paradise apple (*Malus pumila*)	Non-Native	Medium	1
Red alder (*Alnus rubra*)	Native, Riparian	Small (12-17”)	2
		Medium (18-23”)	1
Black elderberry (*Sambucus nigra*)	Native	Small (12-17”)	1
Sitka spruce (*Picea sitchensis*)	Native (Planted)	Small (12-17”)	1
Valley oak (*Quercus lobata*)	Native	Small (12-17”)	19
		Medium (18-23”)	7
		Large (≥ 24”)	11
Weeping willow (*Salix babylonica*)	Non-Native	Small (12-17”)	1
White alder (*Alnus rhombifolia)*	Native, Riparian	Small (12-17”)	10
		Medium (18-23”)	4
		Large (≥ 24”)	3
Total Number of Trees with DBH >12” within PSB			**89**

Impact Analysis

Under each proposed Project alignment varying acreage of impacts would occur to riparian habitat, SNCs, and mature trees. See Table 2 below for an overview of estimated impacts per alignment based on the 15% design trail alignment scenarios. Approximations included in Table 2 are expected to adjust as the Project's design is finalized. Estimations assume a permanent impact width of 14 feet for all alignment scenarios. Furthermore, segments within alignments may be interchanged, and therefore the table is further broken out to show impact by alignment and individual segment. Under each of the alignment scenarios it is expected that riparian habitat, SNCs and mature trees would either be trimmed, limbed or removed due to trail construction, including bridge alterations and/or installation.

Table 2 Estimated Impacts to Riparian, SNC and Mature Trees among Various Alignments

Alignment Scenario		Riparian (sq. ft)	Valley Oak Woodland Alliance SNC (sq. ft)	Mature Trees (dbh)		
				S (12-17")	M (18-23")	L (≥ 24")
Alignment A	Segment 1	2,459	0	0		
	Segment 2	0	0	0		
	Segment 3	0	0			1 (32")
	Segment 4	979	0	2 (12", 13")		
	Segment 5	0	0		1 (24")	
	Segment 6	0	8,804	0		
	Segment 7	1,846	4,678	0		
	Total	**5,284 sq. ft / 0.121 acres**	**13,482 sq. ft / 0.310 acres**	**2 (12", 13")**	**1 (24")**	**1 (32")**
Alignment B	Segment 1	1,232	0	0		
	Segment 2	0	0	0		
	Segment 3	0	0	0		
	Segment 4	505	0	0		
	Segment 5	0	0	0		
	Segment 6	0	6,454	0		
	Segment 7	1,302	0	1 (12")		
	Total	**3,039 sq. ft / 0.070 acres**	**6,454 sq. ft / 0.148 acres**	**1 (12")**	**0**	**0**
Alignment C	Segment 1	0	0	0		
	Segment 4	630	0	0		
	Total	**630 sq. ft / 0.014 acres**	**0**	**0**		
Alignment D	Segment 1	1,253	0	1 (14")		
	Segment 4	505	0	0		
	Total	**1,758 sq. ft/ 0.040 acres**	**0**	**1 (14")**	**0**	**0**

In addition to the mature trees shown above in Table 2, the following mature trees comprise a portion of the riparian habitat area and would be adversely impacted under Alignment Scenario A:

- Five small trees (12”, 13.5”, 14”, 15” and 15”) – Segment 1 (2 trees), Segment 4 (1 tree), Segment 7 (2 trees)
- Two medium trees (21”, 27”) – Segment 1 and Segment 4
- One large tree (27”) – Segment 1

Based on the 15% design trail alignments, permanent impacts to riparian habitat under Alignment A (which include trail and bridge installations) would displace approximately 5,284 square feet (0.121 acres) of vegetation including approximately eight mature trees. Each bridge would provide approximately 1,200 square feet of additional shade over the creek due to the bridge walkway (assuming a length of 120 feet and width of 10 feet). The trail placement has the potential to permanently displace up to approximately 13,482 square feet (0.310 acres) of SNC vegetation under Alignment Scenario A, which is the most impactful alignment for SNC habitat. Outside of riparian and SNC habitat, it is expected that approximately four mature trees across three size classes under Alignment A, one small mature tree under Alignment B, and one small tree under Alignment D would be either trimmed, limbed or removed. This mature tree habitat would be avoided where possible. Removal of a mature tree is considered a potentially significant impact because it is more impactful than removal of immature trees (considered less than 12 inches) due to the time it takes for mature habitat to establish.

Mitigation

Loss of these habitat types and resources is considered a potentially significant impact. Mitigation Measure BIO-8 is proposed to reduce significant impacts to a less than significant level.

Mitigation Measure BIO-8: Protect Habitat, and Avoid and Offset Permanent Impacts to Riparian, SNC and Mature Tree Habitat

Prior to beginning work on the Project, all crew and team members that work on-site shall attend an environmental awareness training conducted by a qualified biologist detailing the mitigation measures to be implemented to protect sensitive resources.

Where possible, impacts to riparian and SNC habitat shall be avoided. Ground disturbance and vegetation clearing and/or trimming would be confined to the minimum area necessary to facilitate Project implementation. Project activities would be restricted to the Project footprint. A qualified biologist would identify and mark all SNCs in the BSA adjacent to the Project footprint prior to any construction activities.

Vegetation that is removed temporarily disturbed during construction shall be replanted and restored in the same general footprint where it was removed, with similar or regionally appropriate native species.

To offset permanent unavoidable impacts (i.e., displacement of riparian habitat, SNCs and mature trees), revegetation of the lost resources shall occur along the trail as close to the area of impact as feasible. Riparian and SNC vegetation shall be planted adjacent to existing riparian and valley oak woodland alliance habitat in order to enlarge existing habitat. If feasible, trees to replace the mature trees shall be replanted in reasonably close proximity to the area of impact. Riparian habitat, SNCs and mature trees shall be mitigated for at a ratio of 4 to 1 to the satisfaction of jurisdictional resource agencies. Revegetation shall occur within the Project Area when possible, or if not possible, within a suitable City-owned off-site mitigation property (see Figure 7, Potential Off-site Mitigation Properties).

A Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared in coordination with jurisdictional permitting agencies for mitigation of biological resources. The HMMP shall be acceptable to jurisdictional permitting agencies and include the following elements: proposed mitigation ratios; description and size of the restoration or compensatory area; site preparation and design; plant species; planting design and techniques; maintenance activities; plant storage; irrigation requirements; success criteria; five-year monitoring schedule; reporting plan and schedule; and remedial measures. The Plan shall be implemented by the City. All revegetation shall uphold the City’s Urban Forestry Management Plan (anticipated to be adopted in 2022), including Strategies 1.1, 1.2 and 2.2 and Objectives 1.1a, 1.1b, 1.1d, 1.1e, 1.2b, 2.2a, and 2.2b.

With incorporation of Mitigation Measure BIO-8, permanent impacts to riparian, SNC and mature tree habitat would be offset through expansion of habitat in an alternate location through planting of the same species permanently impacted.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (Less than Significant with Mitigation)

Aquatic resources, which is inclusive of wetlands and creeks were delineated within the Project Area boundary on July 6 – 8, 2021. The Project Area contains three-parameter wetlands and three seasonal watercourses (Broaddus Creek, Baechtel Creek, and Haehl Creek, mapped as Other Waters) considered jurisdictional by the USACE and Regional Board.

The total area of these mapped Other Waters is 13,861 ft^2 (0.32 acres), and the total area of mapped three-parameter wetlands is 118,994 ft^2 (2.7 acres). The total area of all three-parameter wetlands and Other Waters encompasses 132,855 ft^2 or 3.05 acres, or 12% of the Project Area (see Appendix A, Figures 5-A through 5-D). In general, the wetlands are located parallel to the existing rail corridor at the base of the railroad prism, and the three creeks diagonally cross the trail alignment fairly equidistant from one another, with Broaddus Creek occurring in the northern extent, Baechtel Creek in the central portion and Haehl Creek at the southern portion of the trail alignment.

Based on the 15% design, the Project would impact delineated wetlands and a small ditch (classified as Waters), as summarized in Table 3, Estimated Project Impacts to Wetlands and Waters. The estimates presented in Table 3 are expected to adjust upon the completion of the 100% design. Estimations assume a permanent impact width of 14 feet for all alignment scenarios.

Table 3 Estimated Project Impacts to Wetlands and Waters

Alignment Scenario	Wetlands sq ft (sf)	Creek (OHWM) sq ft (sf)
Segment 1	0	364
Segment 2	0	0
Segment 3	0	0
Segment 4	116	440
Segment 5	800	0
Segment 6	12,378	0
Segment 7	23,221	252
Total	**36,515 sf / 0.838 acres**	**1,056 sf / 0.024 acres**
Segment 1	0	459
Segment 2	0	0
Segment 3	0	0
Segment 4	273	251
Segment 5	488	0
Segment 6	10,199	0
Segment 7	1,959	259
Total	**12,919 sf / 0.297 acres**	**969 sf / 0.022 acres**
Segment 1	0	0
Segment 4	1,109	265
Total	**1,109 sf / 0.025 acres**	**265 sf / 0.006 acres**
Segment 1	0	459
Segment 4	273	251
Total	**273 sf / 0.006 acres**	**710 sf / 0.016 acres**

Permanent impacts to wetlands or creeks, such as filling of wetlands, would result in a potentially significant impact under CEQA, potentially temporary impacts such as an increase in sediment input into creeks during construction may also be considered a significant impact. Impacts to water quality will be reduced via inclusion of Mitigation Measure BIO-7 (above) which states that stormwater and pollution prevention measures shall be implemented to reduce potential water quality degradation, dust, or erosion to areas adjacent to construction activities, exclusion fencing will be placed around creek, and wetlands and SNCs to be avoided and that equipment shall be cleaned of deleterious materials before being delivered to the job site.

No creeks would be filled under any of the alternatives: however, wetland fill is anticipated to occur. Mitigation Measure BIO-9 is incorporated into the Project to ensure that permanent impact to wetlands (wetland fill) remains less than significant, requiring compensatory mitigation to the satisfaction of jurisdictional resource agencies at a ratio no less than 1.2:1 and inclusive of five years of monitoring and reporting and achievement of numeric success criteria. With the implementation of Mitigation BIO-9, impacts to delineated wetlands would be less than significant.

Mitigation

Mitigation Measure BIO-9 would reduce the potential impact of the Project on wetlands to a less-than-significant level by the below-listed actions.

Mitigation Measure BIO-9: Implement Compensatory Mitigation for Wetlands

The City shall compensate for wetlands impacts through restoration, rehabilitation, and/or creation of wetland at a ratio of no less than 1.2:1 and to the satisfaction of the City and permitting agencies. A Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared in coordination with jurisdictional permitting agencies. Compensation for wetlands shall occur so there is no net loss of wetland habitat at ratios to be determined in consultation with and to the satisfaction of jurisdictional permitting agencies. Temporarily impacted wetlands shall be restored in place as part of the Project.

The HMMP shall be acceptable to jurisdictional permitting agencies and include the following elements: proposed mitigation ratios; description and size of the restoration or compensatory area; site preparation and design; plant species; planting design and techniques; maintenance activities; plant storage; irrigation requirements; success criteria; five-year monitoring schedule; reporting plan and schedule; and remedial measures. The Plan shall be implemented by the City. Wetland compensation shall occur within the Project Area when possible, or if not possible, within a suitable City-owned off-site mitigation property (see Figure 7, Potential Off-site Mitigation Properties).

With the implementation of Mitigation Measure BIO-9, potential impacts to wetlands would be less than significant.

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? (No Impact)

Wildlife movement corridors are areas that connect suitable wildlife habitat in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, peninsulas, or areas with vegetative cover provide wildlife corridors. Wildlife movement corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas and facilitate the exchange of genetic traits between populations.

The Project Area and BSA are located within the Pacific Flyway for migratory birds. However, no large expanses of high-quality natural habitat exist that would support high levels of migratory species stopover use, breeding, or wintering specifically within the Project Area, although there is possible suitable habitat in the vicinity, in Little Lake Valley to the west. In addition, no “essential connectivity areas,” “natural landscape blocks,” or “small natural landscape areas” that would support other sensitive species have been identified or mapped in the Project vicinity by the California Essential Habitat Connectivity Project (GHD 2021a).

Creeks within the BSA (Baechtel, Broaddus and Haehl Creeks) are tributaries to Davis Creek, which flows to Outlet Creek which flows into the Eel River. Historical accounts (from the 1930's to the late 1980's) of the three creeks report observation of Coho and Chinook Salmon and steelhead. Although these accounts are historic, suitable habitat within the three creeks appears present (however is limited during the dry season when the creeks can dry up). Sightings of juvenile steelhead (or Rainbow Trout) occurred during a site visit in all of the three creeks within the Project Area. Therefore, the three creeks within the Project Area act as migratory corridors for anadromous fish. The installation of bridges would not impede aquatic migration, as they would span above water and no migrational barrier would occur. In-water work would not occur.

Riparian habitat can function as a wildlife corridor, especially because the intermittent tributaries pass underneath U.S. Highway 101, which can serve as a barrier. Maintaining riparian connectivity throughout the PSB will maintain wildlife habitat and migration corridors. Installation of the proposed bridges would not substantially alter the ability of wildlife to traverse along the creek corridors, given they already currently move and traverse below the railroad track (which would be located adjacent to the trail). Therefore, installation of bridges would not inhibit or substantially adversely impact wildlife from migrating through the riparian corridor.

For safety purposes, a fence a minimum of 42-inches in height would be constructed between the railroad and the trail. The fence would be discontinuous along the alignment, as to not obstruct street crossings or private property access. Fence openings would be placed for access to and from the rail for safety and maintenance purposes. Thus, terrestrial wildlife would not be impeded by the required fence. Any potential impact resulting from the restriction of wildlife movement as a result of the fence would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Less than Significant with Mitigation)

City of Willits General Plan

The following policies and measures from the Willits General Plan pertain to regulating biological resources within the Project Area:

Policies

- *3.21. Conserve to the greatest feasible extent, the City's existing natural resources, with particular emphasis on air and water quality, open space, tree preservation and riparian habitat maintenance and enhancement.*
- *3.22. Ensure that all adverse environmental impacts of proposed development projects are identified and acceptably mitigated prior to approval.*
- *3.23. Ensure that environmental mitigation measures included as conditions of project approval are effectively implemented and maintained over the long term.*
- *3.26. Cooperate with regional and state agencies in programs designed to reduce air and water pollution levels.*
- *3.27. Consider utilization of focused Environmental Impact Reports and Mitigated Negative Declarations to address significant adverse project impacts in a cost-effective manner.*
- *3.28. Initiate and/or support local and regional recycling programs, air quality policies, water conservation and watershed preservation efforts.*
- *3.29. Promote alternatives to automobile use as a means of improving local air quality.*

Measures

- *3.32. All applications for development within 250 feet of Willits, Broaddus or Baechtel Creeks shall be required to include site-specific field observation by a qualified botanist and a wildlife biologist as part of the application package. This requirement may be waived in the event that the City's Environmental Review Officer determines that the proposed project will have no impact on the riparian corridor or that the site in question has been previously disturbed to the extent that the proposed project would be of minimal environmental concern.*

City of Willits Urban Forest Management Plan (Draft)

The City released a draft Urban Forest Management Plan in October 2021 (Dudek 2021) to help the City progress towards creating a sustainable urban forest and climate change-resilient community. The following goals, strategies and objectives are relevant to the proposed Project.

Goal #1: Urban Forest Sustainability: Willits will have a sustainable urban forest that is adapted to climate change and provides widespread canopy cover throughout the City.

Strategy 1.1: Tree planting activities will promote a sustainable urban forest.

- *Objectives 1.1a: Develop criteria for selecting tree species to plant on City managed streets, parks, and other public and open spaces that prioritizes trees known to be adapted to changing climate conditions such as extreme heat and drought.*
- *1.1b: The City tree inventory will comprise no more than 10% of one species, 20% of one genus, or 30% of one family.*
- *1.1d: Tree planting projects in a City park will prioritize the use of local and regional native tree species.*
- *1.1e: Prioritize planting trees rated by Water Use Classification of Landscape Species (WUCOLS) as very low and low water users.*

Strategy 1.2: Increase tree canopy cover across the City.

- *Objectives 1.2b: Develop an annual tree planting plan for both public and private property based on the number of trees needed to reach 22% canopy cover. Total trees planted will not include trees that are required as replacement for a removed tree.*

Goal #2: Tree Management: The City and community members will appropriately manage and maintain trees to ensure a vibrant, healthy urban forest.

Strategy 2.2: Ensure all City tree management activities and design standards reflect the most current understanding of urban forest sustainability.

- *Objective 2.2a: City tree management practices should implement current industry standards as defined by the International Society of Arboriculture, American National Standards Institute, and current research.*
- *2.2b: Develop and adopt alternative design standards for sidewalk installation and repair that minimizes conflicts between trees, sidewalks, and other infrastructure by considering and providing sufficient growing space for trees.*

Impact Analysis

Based on the 15% design, the Project alignment alternatives would include impacts to varying amounts of riparian habitat, SNCs, mature trees, and wetlands. See Table 4 – Overview of Estimated Impacts by Project Alignment below for anticipated impacts by alignment.

Table 4 Overview of Estimated Impacts by Project Alignment

	Riparian	SNCs	Mature Trees	Wetlands	Other Waters (Creeks)
Alignment A	5,284 sf (0.121 acres)	13,482 sf (0.310 acres)	4	36,515 sf (0.838 acres)	1,056 sf (0.024 acres)
Alignment B	3,039 sf (0.070 acres)	6,454 sf (0.148 acres)	1	12,919 sf (0.297 acres)	969 sf (0.022 acres)
Alignment C	630 sf (0.014 acres)	0	0	1,109 sf (0.025 acres)	265 sf (0.006 acres)
Alignment D	1,758 sf (0.040 acres)	0	1	273 sf (0.006 acres)	710 sf (0.016 acres)

These estimates are expected to adjust upon completion of the 100% design. These permanent impact values represent the worst-case scenario estimate of potential impact. Depending on alternative, design adjustments in the field, and in accordance with Mitigation Measure BIO-8, the City's existing natural resources (riparian habitat, SNCs, and mature trees) will be conserved to the greatest feasible extent (meets City General Plan Policy 3.21).

However, to account for unavoidable impacts to protected biological resources including rare plants, special status wildlife, riparian habitat, SNCs, mature trees, water quality and wetlands, mitigation measures BIO-1 through BIO-9 are proposed, satisfying General Plan Policy 3.22. Most mitigation measure includes a reporting component, and all mitigation measures will be tracked by the lead agency (City of Willits) to ensure accountability in implementation, thereby satisfying General Plan Policy 3.23. The Project already satisfies General Plan Measure 3.32, which requires a site specific field observation by a qualified botanist of wildlife biologist to accompany City permit applications, through the completion of the Biological Resources Report (GHD 2021a), Aquatic Resources Delineation Report (GHD 2021b), Tree Survey Inventory Report (GHD 2021c), and Botanical Surveys and Habitat Assessment Technical Memo (GHD 2021d). The Project inherently meets all remaining General Plan policies germane to natural resources.

Under a conservative, worst case scenario up to approximately four mature trees will be removed to enable Project implementation. The loss of these trees would be adverse; however, new trees would be replanted along the trail to replace the mature trees to be removed. Revegetation will occur in accordance with Mitigation Measure BIO-8, which states that revegetation design must meet the strategies and objectives listed in the City's Urban Forest Management Plan, particularly Strategies: 1.1, 1.2, 2.2 and Objectives 1.1a, 1.1b, 1.1d, 1.1e, 1.2b, 2.2a, and 2.2b. Therefore, with mitigation, the Project does not conflict with any local policies or ordinances protecting biological resources. This impact is less than significant with mitigation.

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? (No Impact)

Currently there is not an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans that cover the Project Area. No impact would result.

3.5 Cultural Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?		X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		X		
c) Disturb any human remains, including those interred outside of formal cemeteries?		X		

The cultural resources impact analysis in this Initial Study is based on a confidential Phase 1 Cultural Resource Inventory Report prepared for the Project by DZC Archaeology & Cultural Resource Management (DZC 2022). DZC staff submitted a records search request to the Northwest Information Center (NWIC) of the California Historic Resource Information System (CHRIS) on October 12, 2021. The search included a 200-foot (ft) radius around the Project Study Boundary. DZC also submitted a Sacred Lands File Search Request to the Native American Heritage Commission (NAHC) on October 12, 2021. The NAHC staff responded by email on December 6, 2021, stating that the Sacred Lands File search was negative, and provided a list of Tribal representatives and individuals to be contacted regarding the Project. On January 10, 2022, DZC sent Request for Comment letters to the following Native American representatives as part of the Cultural Resources Inventory Report prepared for the Project (DZC 2022):

– Bear River Band of the Rohnerville Rancheria
– Cahto Tribe
– Cahto Tribe
– Coyote Valley Band of Pomo Indians
– Guidiville Indian Rancheria
– Habematolel Pomo of Upper Lake
– Hopland Band of Pomo Indians
– Hopland Band of Pomo Indians
– Kashia Band of Pomo Indians of the Stewarts Point Rancheria
– Manchester band of Pomo Indians
– Noyo River Indian Community Chairperson
– Pinoleville Pomo Nation
– Potter Valley Tribe
– Redwood Valley or Little River Band of Pomo Indian
– Robinson Rancheria Band of Pomo Indians
– Round Valley Reservation/ Covelo Indian Community
– Sherwood Valley band of Pomo Indians
– Yokayo Tribe

A pedestrian survey of the APE was undertaken by DZC on December 27, 2021.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (Less than Significant with Mitigation)

The CEQA Guidelines define a historical resource as: (1) a resource listed in the California Register of Historical Resources; (2) a resource included in a local register of historical resources, as defined in the California Public Resources Code (PRC) Section 5020.1(k), or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (3) any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

Based on the findings of DZC (2022), previously recorded historic resources are present in the Project Area. These resources are associated with the main stem railroad line and include Resource P-23-000336 (Northwestern Pacific Railroad, NWPRR) and Resource P-23-001890 (California Western Railroad, CWRR). The two resources, specifically along the main stem features, share a historic railroad trestle bridge over Broadus Creek. Both P-23-000336 (NWPRR) and P-23-001890 (CWRR) are California Register of Historical Resources-listed resources, and both are identified as eligible for the National Register of Historical Places (State Historic Preservation Office (SHPO) 2011 cited in DZC 2022). Therefore, design considerations may utilize the rail grade, but must do so in a way that does not diminish the historic integrity of the overall feature, the individual elements contributing to its significance, nor the characteristics that qualify it for the California Register of Historical Resources or the National Register of Historical Places.

Resource P-23-000336

Resource P-23-000336 includes a main stem (RA3) and two siding tracks (RA4 and RA5). Resource P-23-000336 (NWPRR) was determined eligible for the NRHP by SHPO in 2011. However, siding tracks were removed from the immediate vicinity of the Project as late as 2016. This reinforces the interpretation that the Main Stem track (RA3) is the principal rail that provides the continuity of the linear feature through to locations northward, and that RA1, RA4, WT-Spur-1, and WT-Spur-2 are ancillary, noncontributing elements of P-23-000336. Additionally, DZC recorded three new resources, including a telegraph wire and cross arm and two railroad spurs, WT-Spur-1 and WT-Spur-2. The two spurs are associated with Resource P-23-000336. The three new resources were appropriately recorded on Department of Parks and Recreation 513 forms. A field assessment of the telegraph wire and cross arm (Resource WT-01) found that the segment of telegraph line retains little integrity and does not appear eligible for the National Register of Historic Places, nor for the California Register of Historic Resources. Alignment WT-Spur-1 is associated with the transportation of lumber on the NWPRR line, while WT-Spur-2 is associated with sanitation maintenance of the NWPRR and the CWRR. Archival research determined that both WT-Spur-1 and WT-Spur-2 were constructed in the early 1960s and ceased operation by the early 1980s. As such, neither are associated with the period of significance for the NWPRR (1869-1950) nor for the nearby CWRR (1901-1928). Additionally, both WT-Spur-1 and WTSpur-2 lack integrity and are not contributing elements to the historical significance of resource P-23-003663.

Resource P-23-001890

Resource P-23-001890 comprises a main stem (RA2) and one siding track (RA1).

The RA2 track is the main stem alignment of the Skunk Train and RA5 is a non-contributing siding track. Table 5 lists the component features for each historic resource, and the significance of the features in terms of impacts on potential Project activities. As detailed in Table 5, Feature RA2, RA3, the three RA3 bridges, and the RA2 bridge over Broaddus Creek are contributing elements of the two recorded resources and thus should not be removed or altered in a way that impacts the historic integrity of these features.

The Cultural Resource Inventory Report recommended that feature elements removed from the recorded resources shall be considered for purposeful re-use. For example, railroad related elements (ties, rails, spikes, switches) which are removed from the line to accommodate construction should be purposefully re-used for interpretive purposes. Examples of re-use include, but are not limited to, incorporating ties or rails into the structural elements of fences, gates, directional or interpretive signage, or refashioning spikes as mile/trail markers. Design considerations could

include incorporating steel rails into the surface, or stamping the surface with the resemblance of the top of railroad rails, with correct rail size and width. As such, Mitigation Measure CR-1 has been incorporated into the Project to protect the identified historical resources as listed in Table 5 and ensure the Project's potential impact on historic Resource P-23-000336 and Resource P-23-001890 would be less than significant.

Table 5 Historic Resources in the Project Area (from DZC 2022)

Resource	Feature Identifier	Feature	Contributing Element	Removal or Physical Impacts Permitted
P-23-001890	RA1	Siding Track	No	Yes
P-23-001890	RA2	Main Stem Line	Yes	No
P-23-001890	Broaddus Creek Bridge	Railroad Bridge Supporting RA2	Yes	No
P-23-000336	RA3	Main Stem Line	Yes	No
P-23-000336	RA4	Siding Track	No	Yes
P-23-000336	RA5	Siding Track	No	Yes
P-23-000336	Broaddus Creek Bridge	Railroad Bridge Supporting RA3	Yes	No
P-23-000336	Baechtal Creek Bridge	Railroad Bridge Supporting RA3	Yes	No
P-23-000336	Hael Creek Bridge	Railroad Bridge Supporting RA3	Yes	No
P-23-000336	WT-Spur-1	Spur Track	No	Yes
P-23-000336	WT-Spur-2	Spur Track	No	Yes

Mitigation

Implementation of Mitigation Measures CR-1 and CR-2 will reduce potential impact to historical resources to a less-than-significant level by protecting contributing features of Resource P-23-000336 and Resource P-23-001890.

Mitigation Measure CR-1: Protect Contributing Elements of Eligible Historic Resources

The City and/or its contractors shall implement the following requirements to protect Resource P-23-000336 and Resource P-23-001890:

- The final 100% design shall avoid alteration of the recorded rail system and appurtenances to the greatest degree possible.
- The final 100% design for the Project shall not alter contributing component features of Resource P-23-000336 and Resource P-23-001890 (Features RA2, RA3, the three RA3 bridges, and the RA2 bridge over Broaddus Creek) in a manner that demolishes or materially alters those physical characteristics that justify its inclusion in the California Register of Historical Resources. Thus, the RA2 and RA3 tracks shall not be removed.
- If the final 100% design for the trail must cross the RA2 and/or RA3 mainstem lines, the portion of the trail that physically engages the railroad prisms may cover, coincide, or align directly on top of RA2 and/or RA3 but must be completely removable.
- Bridges constructed or altered must be congruent with the character and feeling of the surrounding historic viewshed. Bridge construction and alterations shall visually resemble a steel through-truss with raw steel patination.
- Prior to the removal of the railroad track associated with Features RA1, RA4, and/or RA5, the City shall record each resource prior to removal or alteration on Department of Parks and Recreation 513 forms. Feature elements removed from RA1, RA4, and/or RA5 shall be incorporated into the final 100% design for interpretative purposes.

Implementation of Mitigation Measure CR-1 would reduce the potential impacts to historical resources to a less-than-significant level by implementing the recommendations from the Cultural Resources Inventory Report to protect eligible historical resources and requiring proper recordation for non-contributing elements.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (Less than Significant Impact with Mitigation)

Archaeological resources were not identified in the NAHC response or during the pedestrian survey completed for the Project. Outreach to tribes based on the current NAHC consultation list did not result in any response. However, DZC (2022) identified Segment 6 and Segment 7 to have a moderately high potential for buried precontact cultural resources and recommended archaeological monitoring. If previously unidentified cultural resources are encountered during construction, the impact would be significant. Thus, Mitigation Measure CR-2has been incorporated into the Project to protect archaeological resources that may be inadvertently discovered during construction. With the implementation of Mitigation Measure CR-2, the potential impact to archaeological resources would be less than significant.

Mitigation

Implementation of Mitigation Measures CR-2 would reduce the potential impact to archaeological resources to a less than significant level by requiring archaeological monitoring in sensitive areas as well as procedures that shall be taken in the event of inadvertent discovery

Mitigation Measure CR-2: Archaeological Monitoring and Inadvertent Discovery During Ground Disturbance

The City of Willits shall retain a qualified archaeologist to conduct archaeological monitoring during ground disturbance at or below the base of the railroad grade prism in Segment 6 and Segment 7. If any subsurface archaeological features or deposits, including locally darkened midden soil, are discovered during construction-related earth-moving activities, all ground-disturbing activity in the vicinity of the resource shall be halted, a qualified professional archaeologist shall be retained to evaluate the find, and the appropriate tribal representative(s) shall be notified.

If cultural materials for example: chipped or ground stone, historic debris, building foundations, or bone are discovered during ground-disturbance activities, work shall be stopped within 66 feet of the discovery, per the requirements of CEQA (Revised Guidelines, Title 14 CCR 15064.5 (f)). Work near the archaeological finds shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the materials and offered recommendations for further action. Tribal representatives shall be notified.

Implementation of Mitigation Measure CR-2 would reduce the potential impacts to a less-than-significant level during construction by requiring archaeological monitoring and protocols to address discovery of unanticipated archaeological resources and to preserve and/or record those resources consistent with appropriate laws and requirements.

c) Disturb any human remains, including those interred outside of formal cemeteries? (Less than Significant Impact with Mitigation)

No human remains are known to exist within the Project area. However, the Cultural Resources Inventory Report identified a portion of the Project Area to be archaeological sensitive. As such, the possibility of encountered human remains cannot be discounted, and the potential impact is considered significant. Mitigation Measure CR-3 is included to reduce the potential impact to human remains during construction to a less-than-significant level.

Mitigation

Implementation of Mitigation Measure CR-3 would reduce the potential impact to previously undiscovered human remains to a less-than-significant level by requiring procedures to be taken in the event of inadvertent discovery of such resources consistent with appropriate laws and requirements.

Mitigation Measure CR-3: Protect Human Remains if Encountered During Construction

If human remains are discovered during project construction, work would stop at the discovery location, within 66 feet, and any nearby area reasonably suspected to overlie adjacent to human remains (PRC, Section 7050.5). The Coroner would be contacted to determine if the cause of death must be investigated. If the Coroner determines that the remains are of Native American origin, it is necessary to comply with State laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (PRC, Section 5097). The Coroner would contact the NAHC. The descendants or most likely descendants of the deceased would be contacted, and work would not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in PRC, Section 5097.98.

Implementation of Mitigation Measure CR-3 would reduce the potential impacts to a less-than-significant level during construction because a plan would be implemented to address discovery of unanticipated human remains and to preserve and/or record those resources consistent with appropriate laws and requirements.

3.6 Energy Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Less than Significant)

Construction of the Project would involve a variety of earthwork and construction practices, involving the use of heavy equipment as discussed in Section 1.6.2, Construction Activities and Equipment, and Section 3.3, Air Quality. Construction would require the use of fuels, primarily gas, diesel, and motor oil. The precise amount of construction-related energy consumption that would occur is uncertain. However, construction would not require a large amount of fuel or energy usage because of the moderate number of construction vehicles and equipment that would be used during construction, worker trips, and the relatively short construction duration required for a Project of this scale. Use of fuels would not be wasteful or unnecessary because their use is necessary to complete the Project. Excessive idling and other inefficient site operations would be prohibited. Equipment idling times would be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes or less (as required by the California airborne toxics control measure (Title 13, Section 2485 of the CCR). Therefore, construction would not result in the use of large amounts of fuel and energy in a wasteful manner, and the impact would be less than significant.

Operation of the Project would include periodic maintenance including annual inspections, vegetation management, and infrequent pavement repair. In the event of storm damage, more significant repairs to the trail facility may be needed. These activities would generally be supported by vehicles and use of hand-held tools. The use of fossil-fuel powered equipment to support these operational and maintenance activities would be periodic and short-term (occurring intermittently). These activities would not result in a substantial increase in energy use, and would not result in inefficient, wasteful, or unnecessary consumption of fuels or other energy resources. By promoting bicycle and pedestrian transit, the Project would have a beneficial reduction on energy resources consumed by automobiles.

Maintenance of the trail is anticipated to be performed by City staff. It is anticipated that Project operation and maintenance would generate minimal traffic trips, as motorized access would be limited to light maintenance, police, and emergency service vehicles, and would not result in a substantial increase in energy use above existing conditions. The operational impact would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (No Impact)

The Project would not conflict with or inhibit the implementation of the State Energy Action Plan, Senate Bill (SB) 1389, SB 100, Assembly Bill (AB) 1007, or other State regulations. The Project would temporarily require the use of equipment in order to construct the components of the Project; however, these activities would be temporary and would not interfere with the broader energy goals of the State.

The majority of California's energy-related plans are not directly applicable to the Project or its operations; however, the Project complies with those plan requirements that apply. Operationally, the Project would reduce automobile-related energy consumption by promoting and supporting pedestrian and bicycle transit. The Project would utilize electricity for the proposed trail lighting (refer to Section 1.5, Project Elements). California's Building Energy Efficiency

Standards (Title 24) do not apply to the Project's proposed lights. However, Project lights would be designed to be consistent the recommendations of the International Dark-Sky Association. To comply with these requirements, lighting for the Project would be the minimum lumens necessary. The Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. No impact would result.

3.7 Geology and Soils

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?				X
ii. Strong seismic ground shaking?			X	
iii. Seismic related ground failure, including liquefaction?				X
iv. Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				X
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

The Project Area is relatively flat except for the elevation on the sides of Broaddus, Baechtel and Haehl Creeks, where the banks are somewhat incised. The elevation within the Project Area ranges between approximately 1,364 and 1,397 feet above sea level. Regional geology is likely influenced by seismic activity as a result of the close proximity of the Maacama Fault Zone (Mfz), which runs through the center of Willits and immediately west of the Project alignment as mapped by the California Geological Survey (CGS 2022; Mendocino County 2022). The Mfz is one of three major fault zones that comprise the San Andreas fault system in northern California (Larsen et al. 2005).

The Natural Resources Conservation Service (NRCS) identifies four soil units within the Project Area: Cole silty clay loam 0 to 1 percent slopes, Feliz loam 0 to 2 percent slopes, Gielow sandy loam 0 to 5 percent slopes, and urban land (USDA 2021). The Cole soil series is described as “very deep, somewhat poorly drained soils that formed in alluvium from mixed sources.” Feliz loam soils are “very deep, well drained soils on flood plains...formed in alluvium derived from mixed sedimentary rocks” (USDA 2021). The Gielow sandy loam soil is characterized by “deep, somewhat poorly drained soils formed in alluvium from sedimentary rocks” found on alluvial plains and fans (USDA 2021).

a, a.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. (No Impact)

The Project is located adjacent to the Mfz, which is an identified Alquist-Priolo earthquake fault. According to mapping by the California Geological Survey, the proposed trail alignment is approximately 1,000 feet east of the Mfz in the northern portion of the Project, and approximately 250 feet east of it in the southern portion. Surface rupture occurs when movement on a fault deep within the earth breaks through to the surface; not all earthquakes result in surface rupture. Construction of the Project does not involve deep fissures or excavation, rather construction is predominantly surface level grading and paving with some limited excavations to a depth of approximately three feet below the surface. Although the Mfz is located adjacent to the Project Area, construction activities would not rupture the earthquake fault because no deep fissures would occur under the Project. Additionally, the Project does not include structures intended for human occupancy and would not change the exposure of people or structures to risk of loss, injury, or death from fault rupture. No impact would result.

a.ii) Strong seismic ground shaking? (Less than Significant)

The Project is situated within a seismically active area, within 1,000 feet in the north and 250 feet in the south, of the Mfz, and therefore the probability that strong ground shaking associated with large magnitude earthquakes would occur during the design life of the Project is high. Project implementation would not increase risk of strong seismic ground shaking above existing conditions.

Under existing conditions, the Project Area within the railroad corridor is primarily utilized by transient pedestrians and does not contain a formal trail. Residences are present where alignment scenarios include neighborhood streets (e.g., Madden Lane and Railroad Avenue). In the event of an earthquake, the Project would increase exposure to strong seismic ground shaking to anticipated pedestrians and bicyclists utilizing the proposed trail pathway. The Project does not include design features that present risk to the public or the environment during an earthquake, such as tall buildings or other large structures. The trail would be located at the ground level. Project elements with height would be limited to a fence a minimum of 42-inches in height, signage, and limited new street lighting. Bridges would be installed and/or modified consistent with California Building Code standards, which account for earthquake resiliency. Thus, potential injury and damage from seismic activity from Project elements would be diminished, thereby exposing fewer people and less property to the effects of a major damaging earthquake.

Given the Project would not increase the risk of strong seismic ground shaking and would be constructed to meet California Building Code earthquake resiliency standards, the impact to people and structures from strong seismic ground shaking would be less than significant.

a.iii, aiv, c, d) Liquefaction, landslides, or otherwise unstable soils? (No Impact)

Liquefaction is the transformation of saturated, loose, fine-grained sediment to a fluid-like state because of earthquake shaking or other rapid loading. Liquefaction is known to occur in loose or moderately saturated granular soils with poor drainage. The proposed Project would not include residential development, occupied structures, or critical facilities that would be subject to liquefaction. The Project is located on a flat terrain within an existing railroad corridor. The Project Area does not include steep slopes or hillsides and thus, does not have the potential for landslides. Implementation of the Project would not exacerbate potential liquefaction, rather the potential for liquefaction would remain unchanged following Project implementation. The Project would be constructed to California Building Code requirements and is proposed on top of or adjacent to an existing railroad which is underlain by the same soils as previously identified. Therefore, the soils are not considered unstable. Implementation of the Project would have no impact on liquefaction, landslides, or otherwise unstable soils.

b) Result in substantial soil erosion or the loss of topsoil? (Less than Significant)

Construction activities, including excavation, grading, soil compaction, and operation of heavy machinery would disturb soil and, therefore, have the potential to cause erosion. Erosion and sediment control provisions prescribed in

the City of Willits Municipal Code, California Building Code, and the Project's Environmental Protection Action 1 (SWPPP, see Section 1.8.1) and Mitigation Measure BIO-7 (Protection of Water Quality and Wetlands) would be required as part of the Project. Implementation of Environmental Protection Action 1 and Mitigation Measure BIO-7 include erosion control requirements for silt fences, straw wattles, soil stabilization controls, and site watering for controlling dust. Erosion control requirements are designed to stabilize soils and minimize the potential transport of sediment to receiving waters during and post construction. Therefore, the potential soil erosion impact from construction would be less than significant. Following construction, the Project Area would be redeveloped and areas of exposed soil vulnerable to erosion would not be present. The overall impact related to soil erosion or loss of topsoil would be less than significant. Refer to Section 3.10, Hydrology and Water Quality, for a discussion of construction impacts to water quality associated with soil erosion.

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? (No Impact)

The Project does not propose the installation or modification of septic tanks or wastewater disposal systems. Therefore, construction and operation of the Project would have no impact on the potential for wastewater infrastructure.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Less than Significant Impact with Mitigation)

Paleontological resources are the remains or traces of prehistoric animals and plants. Paleontological resources, which include fossil remains and geologic sites with fossil-bearing strata, are non-renewable and scarce and are a sensitive resource afforded protection under environmental legislation in California. Under California PRC § 5097.5, unauthorized disturbance or removal of a fossil locality or remains on public land is a misdemeanor. State law also requires reasonable mitigation of adverse environmental impacts that result from development of public land and affect paleontological resources (PRC § 30244).

The Project is located in a previously developed corridor and will occur either atop or adjacent to the existing railroad. Potential excavations would occur if the trail was to be implemented adjacent to the railroad, and due to the installation of bridges. Prehistoric resources are most likely to be found at the base of hills ad along seasonal and perennial watercourses, as these areas have been identified as potentially sensitive (DZC 2022). The Project does not involve any deep excavation that would be more likely to result in the inadvertent discovery of paleontological resources, however, it is possible that paleontological resources may be discovered during shallow excavations. As such, the possibility of encountered paleontological resources cannot be discounted, and the potential impact is considered significant. Mitigation Measure GEO-1 is included to reduce the potential impact to paleontological resources during construction to a less-than-significant level.

Mitigation

Mitigation Measure GEO-1 would reduce the impact of construction activities on potentially unknown paleontological resources to a less-than-significant level by addressing discovery of unanticipated buried resources and preserving and/or recording those resources consistent with appropriate laws and requirements.

Mitigation Measure GEO-1: Inadvertent Discovery of Paleontological Resources

If fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), the City and its contractor shall divert construction activities away from the discovery within 50 feet of the find, and a professional paleontologist shall be contracted to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the material, if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for any necessary treatment that is consistent

with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they would be properly curated and preserved.

Implementation of Mitigation Measure GEO-1 would reduce this impact to a less-than-significant level for both construction and operation because a plan to address discovery of unanticipated paleontological resources and to preserve and/or record those resources consistent with appropriate laws and requirements would be implemented.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X

The Project is located within the Mendocino County portion of the North Coast Air Basin, which is within the jurisdiction of the Mendocino County Air Quality Management District (MCAQMD). As the local expert agency for air quality, the MCAQMD provides recommendations on assessing air quality and greenhouse gas impacts for CEQA compliance. On June 3, 2010, the MCAQMD Air Pollution Control Officer issued new CEQA guidance which requested that Planning agencies and consultants use the Bay Area Air Quality Management District (BAAQMD) CEQA Thresholds adopted on May 28th, 2010, to evaluate greenhouse gas impacts, with clarifications provided in 2013 (MCAQMD 2010, MCAQMD 2013). The last major revision of the BAAQMD thresholds was completed in May 2017.

The BAAQMD CEQA Thresholds were subsequently invalidated by a trial court because the BAAQMD itself did not do a CEQA evaluation of the Thresholds before their adoption. The Court, however, did not rule on or question the adequacy of the BAAQMD Air Quality CEQA Guidelines, including the impact assessment methodologies, or the evidentiary basis supporting the Thresholds, which are included in the Guidelines. Therefore, based on the evidence in the record, the City elects to utilize the BAAQMD's CEQA Thresholds, 2017 CEQA Guidelines, and screening guidance for the purposes of evaluating the Project's potential Greenhouse Gas impacts.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Less than Significant)

There is currently no applicable federal, State, or local threshold pertaining to construction-related greenhouse gas (GHG) emissions. The BAAQMD CEQA Guidelines, which are used by the Mendocino County Air Quality Management District, do not include GHG-related screening criteria or significance thresholds for construction. Therefore, this analysis uses a qualitative approach in accordance with Section 15064.4(a)(2) of the CEQA Guidelines.

During construction, GHG emissions would be generated from construction equipment. However, construction would be temporary and last for approximately eight to twelve months, and would be less intensive than traditional land use development that requires a larger fleet of earthmoving equipment or soil off hauling and/or delivery and similar such equipment. Project emissions during construction would not be a considerable contribution to the cumulative GHG impact, given that construction would be temporary, and the size and nature of construction is not considered to result in significant air pollutant emissions (see Section 3.3, Air Quality). Therefore, Project-related GHG emissions during construction is considered less than significant.

Following construction, the Project would result in a negligible increase in operational GHG emissions from electricity consumption from proposed lights, as solar lights are anticipated to be used along the majority of the proposed trail. Maintenance of the trail is anticipated to be performed by City staff. Additionally, the Project would not increase the vehicle capacity of the Project area, and would not induce population growth in the area. Project operation and maintenance would generate minimal traffic trips, as motorized access would be limited to light maintenance, police, and emergency service vehicles. The BAAQMD's (2017) Air Quality Guidelines provides screening criteria for determining if a Project could potentially result in significant operational impacts from GHG. As provided by the

BAAQMD's CEQA Air Quality Guidelines, if the Project is less than the screening level, and is consistent with the methodology used to develop the screening criteria, then its GHG emissions may be considered less than significant.

For operational activities, several different screening criteria are recommended by the BAAQMD relative to air GHG emissions. The most applicable operational GHG screening level is 600 acres for a city park. Given the small Project footprint (less than three acres), the Project would be substantially less than the BAAQMD's operational GHG screening level for a city park. Additionally, by promoting bicycle and pedestrian transit, the Project would have a beneficial reduction on energy resources consumed by automobiles. Therefore, Project operation would result in a less than significant impact on GHG emissions.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (No Impact)

There is not an adopted local or regional plan, policy, or regulation for the purpose of reducing emissions of greenhouse gases. The California Air Resource Board (CARB) 2017 Climate Change Scoping Plan provides California's climate policy portfolio and recommended strategies to put the State on a pathway to achieve the 2030 target. The scenario includes ongoing and statutorily required programs, continuing the Cap-and-Trade Program, and high-level objectives and goals to reduce GHGs across multiple economic sectors. Existing programs, also known as "known commitments," identified by the 2017 Climate Change Scoping Plan include: SB 350, the LCFS, CARB's Mobile Source Strategy, SB 1383 for short-lived climate pollutants and California's Sustainable Freight Action Plan. The high-level objective and goals recommendations cover the energy, transportation, industry, water, waste management, agriculture, and natural and working lands, and are to be implemented by a variety of State agencies.

Project construction would cause a temporary increase in GHGs; however, as discussed above, Project emissions would not have a significant effect on the environment. The Project is analyzed for consistency with the 2017 Climate Change Scoping Plan in Table 6 – Consistency Analysis Between Project and Climate Change Scoping Plan. As described in Table 6, no conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG have been identified. Therefore, no impact would result.

Table 6 Consistency Analysis Between Project and Climate Change Scoping Plan

Scoping Plan Reduction Measures	Consistency/Applicability Determination
California Cap-and-Trade Program Linked to Western Climate Initiative. Implement a broad-based California Cap-and-Trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.	**Consistent**. This is a statewide measure that cannot be implemented by the project or lead agency. PG&E obtains 31 percent of its power supply from renewable sources such as solar, wind, and geothermal, in conformance with various regulations (PG&E 2020). The Project would utilize PG&E power.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Consistent**. This is a statewide measure that cannot be implemented by the project applicant or lead agency. However, the standards would be applicable to the light-duty vehicles that would access the Project Area during construction.
Energy Efficiency. Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Not Applicable**. This is a measure for the state to increase its energy efficiency standards in new buildings. The Project would not result in new habitable buildings subject to the energy efficiency standards.
Renewable Portfolio Standard. Achieve 33 percent renewable energy mix statewide. Renewable energy sources include (but are not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas.	**Consistent.** This is a statewide measure that cannot be implemented by the project or lead agency. The State's Renewable Portfolio goals require energy producers to achieve a 60% renewables goal by 2030, and 100% carbon-free by 2045. The Project will utilize PG&E power. PG&E obtains 31 percent of its power supply from renewable sources such as solar, wind, and geothermal, in conformance

Scoping Plan Reduction Measures	Consistency/Applicability Determination
	with various regulations, and is 85 percent greenhouse gas free (PG&E 2022). The Project would utilize PG&E power.
Low Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	**Consistent**. This is a statewide measure that cannot be implemented by the project or lead agency. The standard would be applicable to the fuel used by vehicles that would access the Project Area during construction.
Regional Transportation-Related Greenhouse Gas Targets. Develop regional greenhouse gas emissions reduction targets for passenger vehicles. This measure refers to SB 375.	**Not applicable.** This is a statewide measure calling for the development of GHG emission reduction targets.
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	**Not applicable.** This is a statewide measure that cannot be implemented by the Project applicant or lead agency.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not applicable.** The Project does not propose any changes to modes of transportation of goods.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Not Applicable.** The Project does not involve structures with roofs.
Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	**Not applicable.** This is a statewide measure that cannot be implemented by the Project applicant or lead agency.
Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost- effectively reduce greenhouse gas emissions and provide other pollution reduction co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.	**Not applicable.** This measure would apply to the direct GHG emissions at major industrial facilities. The Project is not industrial.
High Speed Rail. Support implementation of a high-speed rail system.	**Not applicable**. This is a statewide measure that cannot be implemented by the Project or lead agency. The Project does not involve a high-speed rail system.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Not Applicable**. This is a measure for the state to increase its energy efficiency standards in new buildings. The Project would not result in new habitable buildings subject to the energy efficiency standards.
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	**Not Applicable**. The Project would not include air conditioners or commercial refrigerators.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent.** The Project does not include a landfill. The Project would reduce construction waste with implementation of state mandated recycling and reuse mandates.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not Applicable**. The Project is located in a rural town setting and would not affect forestland. Additionally, the Project would not include areas suitable for reforestation. The Project would replant native trees removed during construction per Mitigation Measure BIO-8.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	**Not Applicable**. The Project would not include an increase in water consumption or energy use associated with water treatment or transport.
Agriculture. In the near-term, encourage investment in manure digesters and at the five- year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not applicable.** The Project does not include agricultural production.

Source of Scoping Plan Reduction Measures: CARB 2008

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?		X		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
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?		X		
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?		X		

An Environmental Due Diligence Corridor Study (Corridor Study) was completed for this Project in 2021 (GHD 2021e). The Corridor Study was limited to an approximately 1.6-mile-long portion of the former Northwestern Pacific Railroad that is now GRTA right of way. The purpose of the Corridor Study was to identify areas of potentially impacted soil and/or groundwater within and near the Project Alignment that may require special handling and disposal during construction or would potentially pose a health exposure risk to construction workers. The Corridor Study included reviewing reasonable ascertainable Government records for properties within one-eighth (1/8) mile (660 feet) of the Project Study Boundary that may have potential for environmental concern during construction and a review of Environmental Database Record (EDR) findings, including historical aerial photos, and field reconnaissance. The EDR database search identified sites that government regulatory agencies have reported as having environmental concerns, such as releases of contaminants to the soil and/or groundwater, underground storage tanks (USTs) or use of hazardous materials. The Corridor Study identified the Project Study Boundary and adjoining properties within the one-eighth mile buffer as Sites of Interest (SOI). Identified sites were assigned a Hazard Rank ranking from one to four, defined as follows:

– Hazard Rank 1: A site that will likely affect Project construction. Contamination of soil and/or groundwater is confirmed to be within or in close proximity to the Project Alignment.
– Hazard Rank 2: A site with the potential to affect the Project, either because of the presence of contamination that may likely migrate into the Project Alignment or because the extent of contamination is unknown.

- Hazard Rank 3: A site that is not known to be contaminated, but due to current or historical use could possibly have contamination that could affect Project construction.
- Hazard Rank 4: A site that has little or no potential to affect the Project.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Less than Significant)

Construction of the Project would include the transport and use of common hazardous materials inherent to the construction process, including petroleum products for construction equipment and vehicles, and paints, asphalt materials, concrete curing compounds, and solvents for construction of Project improvements. These materials are commonly used during construction, are not acutely hazardous, and would be used in relatively small quantities.

Per City of Willits Municipal Code 8.08.160, transportation of hazardous materials within the City must comply with local, state, and federal laws. The California Division of Occupational Safety and Health (Cal-OSHA) also enforces hazard communication program regulations which contain worker safety training and hazard information requirements, such as procedures for identifying and labeling hazardous substances, communicating hazard information related to hazardous substances and their handling, and preparation of health and safety plans to protect workers and employees.

Project construction would be required to implement stormwater management requirements during construction in accordance with the State Water Resources Control Board General Construction Storm Water Permit (Section 1.8 – Environmental Protection Action 1). Stormwater management requirements for addressing materials management would be required, including proper material delivery and storage, spill prevention and control, and management of concrete and other wastes.

Because the City and its contractors would be required to comply with existing and future hazardous materials laws and regulations addressing the transport, storage, use, and disposal of hazardous materials, the potential to create a significant hazard to the public or the environment during construction of the Project would be less than significant.

Following construction, operation of the Project would not result in the need for new hazardous materials that would need to be transported, used, or disposed. No operational impact would result.

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? (Less than Significant with Mitigation)

The Project would utilize heavy machinery to perform construction-related tasks including grading, excavation, and transportation of materials. There is always the possibility when equipment is operating that an accident could occur, and fuel could be released onto the soil. Mitigation Measure BIO-7 includes requirements to avoid accidental spills from heavy equipment during construction. Under Mitigation Measure BIO-7, equipment shall not be refueled within 100 feet of any perennial wetlands or waters. With the incorporation of Mitigation Measure BIO-7, any potential impact would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Less than Significant)

Schools located within approximately one-quarter mile of the Project Area include:

- Willits High School, 22 N. Main Street, approximately 0.3 miles north of the northern trailhead
- Willits Elementary Charter School, 405 E. Commercial, approximately 0.1 miles east of the northern trailhead
- Sanhedrin High School, 120 N. Main Street, approximately 0.3 miles northwest of the northern trailhead
- Willits Charter School, 1431 S. Main Street, approximately 0.3 miles west of the trail

The Project includes the use of heavy machinery which would emit hazardous emissions such as carbon monoxide and are assumed to include the use of hazardous materials such as fuels, lubricants, degreasers, paints, and

solvents. These materials are commonly used during construction, are not acutely hazardous, and would be used in small quantities. Given that construction equipment would be located in an urban area, which is frequently used by vehicular traffic, the emissions associated with construction equipment would be considered less than significant.

Numerous laws and regulations ensure the safe transportation, use, storage, and disposal of hazardous materials. Although construction activities could result in the inadvertent release of small quantities of hazardous substances, a spill or release at a construction area is not expected to endanger individuals at nearby schools given the nature of the materials, the small quantities that would be used, and the distance of the schools from the Project Area. Therefore, because the City and its contractors would be required to comply with existing and future hazardous materials laws and regulations covering the transport, use, and disposal of hazardous materials, and because of the nature and quantity of the hazardous materials to be potentially used by the Project, the impact related to the use of hazardous materials during construction near the school would be less than significant. Project operations would have no impact on schools within one-quarter mile of the Project Area, as operation would not include a new stationary source of hazardous emissions or handling of acutely hazardous materials or waste.

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? (Less than Significant with Mitigation)

The Project is located along an industrial railroad corridor, which is known to include past use of heavy metals, creosote wood products, and other constituents associated with historical railroad activity and construction. Groundwater dewatering is generally not expected but may be required. Groundwater encountered during construction would be from shallow groundwater and not associated with a deeper aquifer. Therefore, the entire Project Alignment is considered to have a hazard ranking of 2 (defined above) (GHD 2021e), and construction activities may encounter residual concentrations of hydrocarbons, creosote wood products, other hazardous materials in the soil or groundwater. The impact is considered significant. With implementation of Mitigation Measure HAZ-1, provided below, this potential impact would be reduced to a less-than-significant level.

Outside of the Project Area but within the 1/8 mile buffer, there are five sites classified with a hazard ranking of 2 (GHD 2021e). Of the five properties, 288 Shell Ln (Persico Fossil Fuels, RWQCB Case # 1TMC359) is an open Leaking Underground Storage Tank (LUST) case and 452 East Hill Rd (Microphor, Inc., RWQCB Case # 1NMC290) is an open Cleanup Program Sites- Spills, Leaks, Investigations, and Cleanups (CPS-SLIC) case in remediation. The property at 288 Shell Ln is a former Shell Oil site with contaminant concerns including petroleum hydrocarbons. The property at 452 East Hill Rd involves potential contaminants of concern that include 1,1,1-Trichloroethane (TCA), acetone, other chlorinated hydrocarbons, other solvent or non-petroleum hydrocarbons, solvents, and trichloroethylene (TCE). Both sites were identified as potentially impacting drinking water aquifers. Both sources are unlikely to impact the Project Area because ground disturbance associated with the Project would not overlap either site and the Project would not involve groundwater from a drinking water aquifer; however, Mitigation Measure HAZ-1 includes soil pre-characterization and hazard materials sampling to ensure the potential impact from known hazardous sites located outside, but near the Project Area, would be reduced to a less-than-significant level. An additional ten sites are located within 1/8-mile of the Project Alignment that are classified with a hazard ranking of 3. A hazard ranking of 3 defines a site that is not known to be contaminated, but due to current or historical use could possibly have contamination that could affect Project construction. All identified EDR listings for the Project Alignment and associated hazard rankings are listed in Table 7.

The Corridor Study identified additional sites outside the 1/8-mile search area, including some that are Cortese listed. Though listed, there is no evidence of point source contamination and no evidence of the likelihood for a hazardous substance or petroleum product release impacting the Site through migration from the listed sites.

Table 7 EDR Listings for within the Project Area and 1/8 mile Buffer (from GHD 2021e)

Property Address	Listed Entity	Listing/Status	Hazard Rank
Project Alignment	GRTA (formerly NCRA)	Historical railroad right of way	2
300 E Commercial St	GP Leased Operation-Willits	HIST UST	2
	Little Lake Industries South	RGA LUST LUST (Closed)	2
	Little Lake Industries So	ENVIROSTOR LUST (Completed – Case Closed)	2
	Little Lake Ind., Inc.	RCRA-SQG (No Violations)	2
380 E Commercial St	Willits Corp Yard Waste Oil Tank	LUST (Completed – Case Closed) RGA LUST	3
	City of Willits Corp Yard	CERS HAZ WASTE	2
	Willits City Yard	SWEEPS UST FID UST	2
	City of Willits Public Works Corp Yard	AST	2
	Willits, City, Corporation Yard	RGA LUST	2
295 E Commercial St	Northwestern Pacific Railroad	CPS-SLIC	3
	Northwestern Pacific Railroad Authority – Willits Rail Yard	CPS-SLIC (Open – Site Assessment)	3
141 Pearl St	Pacific Bell	HIST UST	3
202 Madden St	AT & T California – TDU16	UST LUST (Completed – Case Closed) SWEEPS UST FID UST CERS TANKS	2
	SBC Facility Willits	RGA LUST	2
374 E San Francisco Ave	Not Listed	ERNS	3
229 E San Francisco Ave	Union Oil	ENVIROSTOR	3
530 Central St	Alecksick, Mary A.	CPS-SLIC (Completed – Case Closed) RGA LUST	3
661 Railroad Ave	Windsor Mill	RCRA-SQG (No Violations)	3
	Windsor Mill Co.	AST CERS HAZ WASTE	3
288 Shell Ln	Rinehart Oil, Inc. Plant 2	HIST UST SWEEPS UST FID UST	2
	Persico Fossil Fuel	RGA LUST HIST UST LUST (Open – Site Assessment)	2
	Shell Oil Products US Willits Bulk Plant	RCRA-SQG (No Violations)	2
	Rhinehart Oil Inc.	EDR Hist Auto	2
	Helms Petroleum Company	AST	2
	Eel River Fuels, Inc. Willits	AST	2

Property Address	Listed Entity	Listing/Status	Hazard Rank
Shell Ln	Hardwood Products Truck Service Yard	CPS-SLIC	3
291A Shell Ln	Norcal Recycled Rock & Aggregates, Inc.	AST	3
291 Shell Ln	Nor-Cal Redi Mix	AST	3
251 Shell Ln	Pacific Pride	CERS HAZ WASTE CERS TANKS	3
452 E Hill Rd	Microphor, Inc.	CPS-SLIC (Open – Remediation) AST RCRA-SQG (No Violations) RGA LUST ENVIROSTOR HIST UST	2

Mitigation

Mitigation Measure HAZ-1 would reduce the impact of potential exposure from potential hazardous materials to construction workers, nearby receptors, and the environment to a less-than-significant level by conducting site investigatory soil pre-characterization for specific contaminants of concern (COCs), and requiring the proper handling and disposal of hazardous wastes per applicable local, state and federal regulations and/or guidelines. A Sampling Analysis Plan (SAP) shall be prepared to determine if specific COCs are present above regulatory thresholds. Once pre-characterization is complete and depending on the results of pre-characterization, a project-specific Soil and Groundwater Management Plan (SGMP) and/or a Soil Excavation, Stockpiling and Transportation Plan (SESTP) will be prepared. The purpose of the SGMP is to document, in accordance with best risk management practices, the general procedures for worker safety protocols, and for managing excavated soil and/or groundwater removed during construction. The SGMP and/or SESTP shall address specific training requirements for soil and groundwater management, materials handling, dewatering, soil stockpiling, transportation, and disposal procedures as presented in the Corridor Study.

Mitigation Measure HAZ-1: Implement Corridor Study Recommendations

The City shall complete the following requirements to implement the Corridor Study recommendations:

- A Sampling Analysis Plan (SAP) shall be prepared by the City or its contractor to define sample locations, boring depths based upon design, estimated soil volumes, and number of borings to adequately pre-characterization project alignment soils and/or groundwater. The SAP shall include pre-characterization of soil and groundwater for potential constituents of concern (COCs), and shall include an assessment of CAM-17 metals and petroleum hydrocarbons prior to initiating construction activities. The SAP shall further include specifications for surficial samples that will be collected to the proposed depth of excavation in the areas where ground disturbing activities are proposed.
- Prior to construction of the Project, pre-characterization shall be conducted at SAP identified locations and in proximity to adjoining properties with a hazard ranking of 1 or 2 within the limits of planned ground disturbance for worker protection and waste characterization.
- If pre-characterization analysis results determine COCs above regulatory background thresholds for human and environmental health exposure, then a site-specific Soil and Groundwater Management (SGMP) shall be prepared to address proper handling of potentially impacted soil and groundwater prior to waste stream characterization, proper disposal, and handling requirements for worker protection. The SGMP shall proactively plan for and manage potentially encountered hazardous materials affected soils, and to provide special soil and groundwater handling and stockpiling details throughout the Project Area construction areas for worker protection, final waste disposal purposes and to mitigate potential project construction delays. The SGMP shall reference the Corridor Study, Sampling Analysis Plan, and any

existing soil and or groundwater data available. Key elements of the SGMP will include management options for excavated soils, waste characterization options for excavated soils, areas of impact soil and or groundwater, sampling strategy for stockpiled soils, special handling requirements, record keeping, and HAZWOPER training. The SGMP shall indicate the specific level of protection required for construction workers and include preparation of a site-specific health and safety plan in accordance with federal OSHA regulations (29 CFR 1910.120) and Cal-OSHA regulations (8 CCR Title 8, Section 5192) to address worker health and safety issues during construction.

- Where Project construction design proposes to include demolition or deconstruction of existing structures (bridges), subsequent pre-demolition hazard materials sampling shall occur for asbestos and lead at locations where structural demolition would occur.
- A Soil Excavation, Stockpiling and Transportation Plan (SESTP) shall be prepared once the areas of Project ground disturbance are confirmed and prior to construction. The SESTP will specify measures to appropriately manage soil spills during Project construction for waste characterization, worker protection, fugitive emissions control and disposal. Alternatively, soil spoils can be initially field screened (visual, olfactory, photo-ionization detector, etc.) and stockpiled, then subsequently characterized for appropriate disposal methods according to applicable waste facility requirements.
- If construction activities include dewatering, and if laboratory analysis of pre-construction soil borings indicate elevated total and Soluble Threshold Limit Concentration (STLC) concentrations of 1,000 ppm and 5 mg/L, respectively, then dewatered groundwater will be stored in tanks, and characterized for waste disposal or permitted for treatment and discharge to sanitary sewer, storm drain, or land.
- All potentially contaminated materials encountered during Project construction activities shall be evaluated in the context of applicable local, state and federal regulations and/or guidelines governing hazardous waste. All materials deemed to be hazardous shall be remediated and/or disposed of following applicable regulatory agency regulations and/or guidelines. Disposal sites for both remediated and non-remediated soils shall be identified prior to beginning construction. Management of these sites shall be documented in a Material Management Plan acceptable to applicable agencies. All evaluation, remediation, treatment, and/or disposal of hazardous waste shall be supervised and documented by qualified hazardous waste personnel.

With the incorporation of Mitigation Measure HAZ-1, the potential impact to construction workers, nearby receptors, or the environment would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (No Impact)

The Project is not located within two miles of a public use airport or private airstrip covered by the Mendocino County Airport Comprehensive Land Use Plan (Mendocino County 1996). The nearest airport is the Willits Municipal Airport, which is located approximately three miles from the Project Study Boundary. Therefore, no impact would result.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Less than Significant)

The City of Willits Emergency Operations Plan (EOP) identifies the City's emergency response and evacuation policies and procedures for hazards related to earthquake, extreme weather, landslides, transportation accidents, hazardous materials, interface wildlife fire, energy shortage, dam failure, civic disturbance, terrorist activities, and national security (City of Willits 2007). Additionally, a draft Emergency Evacuation Plan was developed for the Oak Fire in 2020, which identifies evacuation zones and routes (City of Willits 2020). The proposed Project would not impair implementation or physically interfere with the City's EOP or draft Emergency Evacuation Plan, as construction and operation of the Project primarily occurs on a railroad corridor, which would not impede ingress or egress of emergency shelters or evacuation routes.

Mendocino County has adopted the multiple plans related to emergency response, hazard management and mitigation, or emergency evacuation, in which hazards or plans for the City of Willits are included. County plans include, but are not limited to: Mendocino County Community Wildfire Protection Plan (MCFSC 2015), Mendocino County Operational Area Emergency Operations Plan (2016), and Mendocino County Multi-Jurisdictional Hazard Mitigation Plan (Mendocino County 2021). Additionally, the Mendocino County Evacuation Plan identifies dam failure, earthquake, flood, hazardous materials, and wildfire as potential major hazards that could require evacuation from the City of Willits (Mendocino County 2020a). The City is located in Evacuation Planning Area 1. The Project is located in Evacuation Zones 1A and 1B, which were established primarily for wildfire evacuations. Primary evacuation routes are Highways 101 and 162. Willits High School on North Main Street is located approximately 0.3 miles from the Project Area and is identified as an emergency evacuation shelter. Project construction primarily occurs on a railroad corridor, which would not impede ingress or egress of emergency shelters or evacuation routes.

However, some alignment scenarios would involve limited work on residential streets to paint sharrow markings and install signage, which would generally be brief. Ground disturbance on residential streets would not occur. Painting sharrow markings, striping, and installing signage on residential streets would be brief in nature and would not impede emergency access or evacuation routes. The impact would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Less than Significant with Mitigation)

A wildfire is an uncontrolled fire spreading through vegetative fuels, posing danger and destruction to property, wildlife and human life. The Project site is located within a Local Responsibility Area (LRA) served by the Little Lake Fire Protection District and the Willits Volunteer Fire Department. The Little Lake Willits Fire Department station is location within a quarter mile of the southern portion of the Project Area. Areas to the west and south of the City of Willits are in a State Responsibility Area (SRA) and served by California Department of Forestry and Fire Protection (Cal Fire) (California Board of Forestry and Fire Protection 2022, Cal Fire 2022). The closest Cal Fire station is approximately a 5-mile drive from East Hill Road.

Cal Fire is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These Fire Hazard Severity Zones (FHSZ) influence how people construct buildings and protect property to reduce risk associated with wildland fires. The Project is located in an area mapped as a moderate fire hazard severity zone, which is the lowest risk of all mapped categories (Cal Fire 2007, City of Willits General Plan Safety Element 2019). It is possible fire ignition could occur during construction (e.g. related to heavy machinery usage). The Project would not otherwise increase exposure to wildlife fire above existing conditions. To reduce this potential hazard to a less than significant level, HAZ-2 has been incorporated into the Project.

Mitigation

Implementation of Mitigation Measure HAZ-2 requires the City to reduce fire hazards related to trail construction.

Mitigation Measure HAZ-2: Reduce Wildland Fire Hazards During Construction

Prior to construction, the City and its contractor(s) shall remove and/or clear away dry, combustible vegetation from the construction site. Grass and other vegetation less than 18 inches in height above the ground shall be maintained where necessary to stabilize the soil and prevent erosion. Vehicles shall not be parked in areas where exhaust systems contact combustible materials. Fire extinguishers shall be available on the construction site to assist in quickly extinguishing any small fires. The contractors shall have on site the phone number for the local fire department(s) and local Cal Fire station.

With the incorporation of Mitigation Measure HAZ-2, the potential impact to people or structures, either directly or indirectly, from a significant risk of loss, injury or death involving wildland fires would be less than significant.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		X		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			X	
i. Result in substantial erosion or siltation on- or off-site?			X	
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
iv. Impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

Three creeks cross the trail alignment. Broaddus Creek is the northernmost tributary within the Project Study Boundary; Baechtel Creek is the central tributary, and Haehl Creek is the southernmost tributary. The three creeks are perennial anadromous tributaries to the Eel River. Additionally, the Project Study Boundary includes three-parameter wetlands identified in the wetland delineation completed for the Project (GHD 2021b), which are also regulated as Waters of the U.S. and State.

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? (Less than Significant with Mitigation)

The Project is required to obtain and comply with necessary Clean Water Act permits requirements from the North Coast Regional Water Quality Control Board and the US Army Corps of Engineers, acting to prevent, or essentially reduce the potential for the Project and operations to violate any water quality standards or waste discharge requirements.

The greatest potential Project impacts to water quality would result from sediment mobilization during construction, including modifications to and construction of bridge crossings over three creeks and construction near juxtaposed three-parameter wetlands. During bridge construction, in-water work would not occur. Depending on the bank elevation, some construction below the Ordinary High Water elevation may occur. The proposed retaining walls or wing walls associated with bridge crossings would be short and only installed to account for localized grading to

support the trail. Excavation for the Project would likely include footings for the retaining walls and the bridge foundation, which would be a traditional grade beam or drilled piles with a pile cap.

Construction activities such as site clearing, grading, excavation, and material stockpiling could leave soils exposed to rain or surface water runoff that may carry soil contaminants (e.g., nutrients or other pollutants) into waterways adjacent to the site, degrade water quality, and potentially violate water quality standards for specific chemicals, dissolved oxygen, suspended sediment, or nutrients. Therefore, if not properly managed, construction activities could result in erosion, as well the discharge of chemicals and materials. In such an instance, applicable water quality standards and waste discharge requirements could be violated, and polluted runoff could substantially degrade water quality in the local storm drain system. This impact is considered to be potentially significant.

However, as described in Section 1.8.1 (Environmental Protection Action 1), because the proposed Project is anticipated to disturb over one (1) acre of land, compliance with State Water Board Order No. 2009-0009 would be required which will regulate stormwater runoff from Project construction activities. Project operations will obtain coverage under State Water Resources Control Board Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities, as amended by Order No. 2012-0006. In compliance with the National Pollutant Discharge Elimination System requirements, a Notice of Intent would be prepared and submitted to the North Coastal Regional Water Board prior to undertaking construction, providing notification and intent to comply with the State of California Construction General Permit. In addition, a Construction Stormwater Pollution Prevention Plan (SWPPP) would be prepared for pollution prevention and control prior to initiating site construction activities.

The Construction SWPPP would identify and specify the use of erosion sediment control requirements for control of pollutants in stormwater runoff during construction related activities, and would be designed to address water erosion control, sediment control, off-site tracking control, wind erosion control, non-stormwater management control, and waste management and materials pollution control. A sampling and monitoring program would be included in the Construction SWPPP that meets the requirements of the NCRWQCB to ensure the BMPs are effective. A Qualified SWPPP Practitioner would oversee implementation of the Plan during all elements of Project implementation, including visual inspections, sampling and analysis, and ensuring overall compliance. Additionally, water sourced from dewatering activities would be pumped into Baker tanks (or similar), dewatering bags, or settling basins and used for dust control purposes. Water sourced from dewatering would not be discharged to storm drains, sewer systems, or any drainage ditches to cause potential polluted runoff.

Implementation of Environmental Protection Action 1, combined with Mitigation Measure BIO-7, would reduce potential water quality impacts during Project construction activities to a less-than-significant level by requiring measures to control erosion and sedimentation of receiving water bodies. Mitigation Measure BIO-7 requires erosion control measures to be included on the 100% design plan set for areas of ground disturbance in and adjacent to Waters of the U.S. and State. Mitigation Measure BIO-7 also requires exclusion fencing near the three creeks, wetlands, and SNCs to be avoided. Under Mitigation Measure BIO-7, the location of exclusion fencing shall be included on the 100% design plan set for construction. Exclusionary fencing would prevent unintended entry of equipment or construction personnel into regulated waters, including juxtaposed wetlands, and development of erosion control plans to prevent inadvertent sediment delivery or impacts Waters of the U.S. and State. Implementation of Environmental Protection Action 1 and Mitigation Measure BIO-7 would mitigate potential impacts on water quality standards and waste discharge requirements to a less-than-significant level by appropriately managing construction dewatering and implementing erosion control measures near streams and other wetted waters of the U.S. or State.

Following construction, operation and maintenance of the Project would not result in a new point discharge, a substantial increase in impervious surfaces, or require planned discharges to the local storm drain system. No operational impact would result.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (Less than Significant)

The Project is located in the Little Lake Valley Groundwater Basin No. 1-13 (DWR 2004) and is not overdrafted (LACO 2020). Contractor-supplied water would be used during construction for dust suppression on local roadways and work areas. Use of groundwater is not anticipated for construction of the Project, although some limited dewatering of excavations may be necessary. Similarly, the Project would not decrease groundwater supplies or interfere with groundwater management. During construction, isolated and short-duration groundwater dewatering may occur as needed. Dewatering would be small in scale and limited to shallow groundwater only. The construction-related impact on groundwater levels would be less than significant.

Following construction, the Project would not utilize groundwater and would not result in an increase in population or employment that would indirectly increase groundwater demand. Therefore, the Project would not create a deficit in aquifer volume or a lowering of water levels. Additionally, the amount of impervious surface created by the Project is minimal when compared to the remaining adjacent undeveloped surfaces, thereby not affecting groundwater recharge. The Project is not expected to result in any change in the use or recharge of groundwater. No operational impact would result.

c.i) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site? (Less than Significant)

Erosion and sediment prevention would be implemented during construction to avoid impacts to water quality, including those related to siltation (see Hydrology and Water Quality Section (a), above). The Project would be required to adhere to SWPPP conditions and requirements, as well as CWA Section 401 and 404 permits, including measures to prevent erosion-related impacts during construction. Substantial on- or off-site erosion and siltation would not result, and the potential construction-related impact with regard to erosion and siltation would be less than significant.

The Project would add approximately 84,480 square feet (1.93 acres) of impervious Class I paved trail surface, 10 feet in width and bordered by pervious surface on either side. Alignment scenarios that include locating the trail on existing residential streets would result in less than 84,480 square feet (1.93 acres) of new impervious surfaces. Because the narrow trail would be bordered by pervious surface, any new runoff resulting from the trail would quickly infiltrate, avoiding a risk of substantial erosion resulting from stormwater events. As discussed in Section 1.5, the Project lies within the city limits and is currently not under an MS4 Permit. The Project would disturb more than one acre and is subject to the Construction General Permit Post-Construction requirements as regulated by the California State Water Board. The Project would meet the post-construction water balance requirements and would thus be exempt from post-construction stormwater Best Management Practices. As such, the trail is exempt from LID stormwater design requirements. The trail design would avoid steep slopes or other design features that could contribute to slope instability, future erosion, and risk of siltation. The operational impact would also be less than significant.

c.ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (Less than Significant)

Portions of the Project Study Boundary are located in the Federal Emergency Management Agency (FEMA) 100-year flood zone (FEMA 2022). The portions of the Project Study Boundary within the FEMA 100-year flood zone are primarily associated with the areas immediate to the three creeks. Through the Project's design, existing drainage (e.g., culverts) would be upgraded and new drainage features would be added. The existing stormwater flow patterns drain away from the proposed road crossings toward existing wetland and surface water (stream) features. Under existing conditions, there are no signs of localized flooding. Thus, the existing storm water pathways would be retained in the trail's design. Following completion of construction, the drainage pattern would be similar to existing conditions. Drainage from the trail would sheet flow laterally toward the gravel shoulder (reducing the velocity) before it would sheet flow into the landscape or open space areas. The storm water would infiltrate into the landscaping or open

space areas on one side of the trail, which follows the existing drainage patterns toward the existing stormwater surface features. Additionally, the trail, including any new and/or modified bridges, would not alter the channel geometry or floodplain topography of the three creeks or include other modifications that could change the existing flood setting of the waterways. The potential impact to on- and off-site flooding resulting from a drainage pattern would be less than significant.

c.iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? (Less than Significant)

Within the Project Study Boundary, existing stormwater drainage systems along the railroad corridor are minimal. In general, the running slope is uphill from Commercial Street south to Hill Road.

– Commercial Street and Valley Street - topography is generally flat and slopes south toward Broaddus Creek via sheet flow and some shallow concentrated areas.
– Valley Street to San Francisco Avenue - topography is generally flat and slopes via sheet flow and some shallow concentrated areas toward existing surface water features.
– San Francisco Avenue to Barbara Lane - topography is generally flat and slopes via sheet flow to shallow drainageways which eventually drain to Baechtel Creek.
– Barbara Lane to Hill Road - topography is generally slopes downhill from Hill Road toward Barbara Lane, but is incepted by two creeks, Baechtel Creek and Haehl Creek.

The stormwater runoff is generally flows south to north via sheet flow to shallow drainageways, which eventually drain to either Baechtel Creek or Haehl Creek. As discussed above in Hydrology and Water Quality Section (Impact a) requirements of the SWPPP, CWA Section 401 and Section 404 permits would also be implemented, including measures to prevent polluted stormwater runoff during construction. Thus, any construction-related impact would be less than significant.

Operationally, the Project does not include elements that would significantly alter topography and rates of stormwater runoff. The Project would add approximately 84,480 square feet (1.93 acres) of impervious Class I paved trail surface, 10 feet in width and bordered by pervious surface on either side. Because the narrow trail would be bordered by pervious surface, new runoff resulting from the trail would quickly infiltrate, avoiding a risk of substantial erosion resulting from stormwater events. For operational stormwater, the Project would obtain coverage under SWRCB Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities, as amended by Order No. 2012-0006, which would include a SWPPP as described in Environmental Protection Action 1 (see Section 1.8.1). The trail would predominantly be used by non-motorized users, the exception being periodic use of light maintenance, police, and emergency service vehicles; thus, polluted runoff containing oil, gas, and other hazardous substances would not occur, consistent with existing conditions. The potential operational impact would be less than significant.

c, iv) Impede or redirect flood flows? (Less than Significant)

Portions of the Project Study Boundary are located in the FEMA 100-year flood zone, primarily areas immediate to the three creeks (FEMA 2022). However, the Project design does not include any features that would impede or redirect flood flows. Existing topography, which is generally flat, would not be altered to include steep drainages or slopes. The trail would be located near the existing ground surface and would not impede or redirect flood flows. Bridges, if constructed or altered, would not be lowered within closer proximity to any of the three creeks or impede the existing flood hydrology of the three waterways. Other Project design elements, such as required fencing to separate the trail from the active railroad and signage, would also not impede or redirect flood flows. Any potential impact on the impediment or redirection of flood flows would be less than significant

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (Less than Significant)

Portions of the Project Area, particularly areas immediate to the three creeks, are located in the FEMA 100-year flood zone (FEMA 2022). As portions of the Project Area overlap the FEMA 100 year flood zone, construction would not occur during flood conditions (see Section 1.6 – Construction Schedule). Thus, there would be no potential for a flood-related release of pollutants during construction. The Project does not include unsecured elements that could be washed away during a flood. Any potential construction related impact would be less than significant.

Operational maintenance of the trail would involve occasional repair and vegetation maintenance (e.g., mowing), which could involve hazardous materials (e.g., small equipment fuel). However, these materials would not be stored within the Project Area and thus would not be released into the environment in the event of a flood event. Any potential operational related impact would be less than significant.

The Project Area is not located near a larger isolated body of water that may be affected by a seiche. No impact from a seiche would result. Similarly, the Project Area is located inland and outside a tsunami hazard zone. No impact from a tsunami would result.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (No Impact)

The relevant water quality control plans are the NCRWQCB's Basin Plan, which establishes thresholds for key water resource protection objectives for both surface waters and groundwater, and the Little Lake Valley Groundwater Management Plan (LACO 2020). The Project does not involve the use of groundwater resources and would not impact the quantity or quality of groundwater availability in the Little Lake Valley Groundwater Basin.

Per Environmental Protection Action 1 (see Section 1.8.1), the Project would be required to obtain coverage under SWRCB Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities, which would include a SWPPP. The Project is also required to obtain and adhere to CWA Section 401 and CWA Section 404 permits (see Section 1.9 – Regulatory Approvals). Adherence to these regulatory requirements and associated requisite monitoring would ensure a conflict with the Basin Plan does not occur.

The Project is also consistent with the Conservation and Open Space Policies and Implementation Measures in the Willits General Plan. The Project has complied with General Plan Implementation Measure 3.310, requiring CEQA, compliance with State environmental law, and mitigation for any project-specific impacts. Required biological and archeological evaluations were completed for trail development within 250 feet of Broaddus and Baechtel Creek, as required under General Plan Implementation Measure 3.320 and Implementation Measure 3.330. No impact would result.

3.11 Land Use and Planning

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

a) Physically divide an established community? (No Impact)

The Project would involve construction and operation of a multi-purpose Class I Trail from East Commercial Street to East Hill Road within the GRTA right of way, within the City limits. Some alignment scenarios propose locating the trail on residential streets absent ground disturbance during construction. Trail elements on residential streets would be limited to painted sharrow markings, striping, and signage. The proposed improvements would not divide an existing neighborhood or community. Rather, the trail would enhance community connectivity. For safety purposes, a fence a minimum of 42-inches in height would be constructed between the railroad and the trail. The fence would be discontinuous along the alignment, as to not obstruct street crossings or private property access. Fence openings would be placed for access to and from the rail for safety and maintenance purposes. Thus, the required fence would not inadvertently divide the community. No impact would result.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (No Impact)

The proposed Project would be located within the existing GRTA right of way and include intersections with existing City street crossings. Within the GRTA right of way, the Project Area is designated as Industrial General (M-G) in the City's General Plan, consistent with the Project Area's use as an active railroad corridor. Alignment scenarios that extend onto residential streets (e.g., Madden Lane, Railroad Avenue) include residential zoning. The Project does not conflict with the General Plan and is specifically support by policies in the Circulation Element, Conservation and Open Space Element, and Public Services and Facilities/Parks and Recreation Element, as noted below. The Project is also consistent with the Noise Element (please see Section3.13 – Noise for associated impact analysis based on the General Plan Noise Element).

2.00 Willits General Plan Circulation Element

- *Policy 2.230 - Enhance the availability and accessibility of alternative modes of transportation, such as walking, bicycling, carpools, and buses. Incorporate mass transit facilities such as bus shelters and park and ride lots into the design of public and private development projects.*
- *Measure 2.340 - Designate a network of bicycle routes providing safe passage throughout the City; establish linkages between schools and the designated bikeway.*

3.000 Willits General Plan Conservation and Open Space Element

- *Policy 3.290 - Promote alternatives to automobile use as a means of improving local air quality.*

Measure 3.310, 3.320, and 3.330 - Environmental review requirements for CEQA, biological investigations, and cultural resource investigations.

6.00 Willits General Plan Public Services and Facilities, Parks and Recreation Element

- *Policy 6.250 - Promote a diverse range of parks, recreational facilities and programs to meet the need of various components of the local population.*

The Project is also consistent with other key City and Mendocino County planning documents, including:

– Willits Safe Routes to School Action Plan (2017)
– City of Willits Bicycle and Pedestrian Specific Plan (2009)
– Mendocino County Rail-with-Trail Corridor Plan (2012)

The City of Willits Bicycle and Pedestrian Specific Plan identifies the Project alignment as a portion of the GRTA (formerly NCRA) Rail Trail (City of Willits 2009). The Mendocino County Rail-with-Trail Corridor Plan also identifies the Project alignment, at the planning level. Additionally, the Willits Safe Routes to School Action Plan identifies creating a Class I Trail facility along the Railroad Avenue corridor, including Railroad Avenue and areas to the southeast along a potential future street alignment, as an improvement recommendation.

Specific policies and regulations adopted for the purpose of avoiding or mitigating environmental effects are evaluated in this document under the corresponding issue areas. For example, an evaluation of the Project in relation to biological resources is provided in Section 3.4, Biological Resources. Evaluation of wildfire risk and emergency evacuations in relation to the Mendocino County Evacuation Plan is provided in Section 3.9 (Hazards and Hazardous Materials), and Section 3.20 (Wildfire). Agencies that regulate the filling of wetlands and waters include the USACE and the NCRWQCB. Since the proposed Project would affect USACE and NCRWQCB jurisdictional wetlands, the City would obtain the necessary permits to comply with respective regulations including Clean Water Act Section 404, and Section 401. Similarly, the City would obtain permits from CDFW for any impacts to the three tributaries, regulated SNCs, or special status plants in the Project Area, consistent with Section 1602 Streambed Alteration Agreement permitting requirements and CESA. By implementing permit requirements and mitigation measures identified in Section 3.4 (Biological Resources) and Section 3.10 (Hydrology and Water Quality) above, the Project would not conflict with any applicable federal and State environmental regulations. Additionally, the proposed trail would not permanently alter the existing land uses, their designations, or their zoning, and would not introduce new land uses or land use designations or zoning; therefore, no conflict with applicable land use plans, policies, or regulation(s) would occur. No impact would result.

3.12 Mineral Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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?				X
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?				X

a, b) 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, or a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (No Impact)

The most predominant of the minerals found in Mendocino County are aggregate resource minerals, primarily sand and gravel, found along many rivers and streams. Although aggregate hard rock quarry mines are found throughout the county, there are no locally important aggregate or mineral resources on or in the vicinity of the Project Area. In addition, the Project is not located in an area designated as a Mineral Resource Zone (MRZ)-2 by the Surface Mining and Reclamation Act (CA DOC 2022). The Project would not result in the loss of known mineral resources of value to the region or state, or loss of local-important mineral resources. No impact would result.

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3.13 Noise

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Result in generation of excessive groundborne vibration or noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X

The Project is located in an urban environment and is primarily industrially zoned. The existing noise setting is consistent with the partially active railroad corridor and includes noise associated with the Skunk Train rail excursion, other railroad uses, railroad maintenance and repair, and adjacent industrial and commercial uses.

a) Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Less than Significant)

The Project Area is an existing railroad corridor, which includes active railroad usage and associated ambient noise conditions. Current noise conditions on and near the Project Area also include local traffic along City streets, residential noise, railroad noise, and noise attributable to industrial and commercial properties adjacent to the Project Area. There are no residences located in the Project Area; however nearby residences and sensitive receptors include:

– Residences on Madden Lane and Pearl Street
– Residences on East Valley Street near the intersection of Railroad Avenue
– Residences along Railroad Avenue between East Valley Street and East Barbara Lane
– Willits High School, 22 N. Main Street, approximately 0.3 miles north of the northern trailhead
– Willits Elementary Charter School, 405 E. Commercial, approximately 0.1 miles east of the northern trailhead
– Sanhedrin High School, 120 N. Main Street, approximately 0.3 miles northwest of the northern trailhead
– Willits Charter School, 1431 S. Main Street, approximately 0.3 miles west of the trail
– Frank Howard Memorial Hospital, located proximal to the southern trailhead

The City of Willits General Plan Noise Element establishes noise standards for the Project Area. Applicable policies and implementation measures from the noise element are listed below.

4.00 Willits General Plan Noise Element

- *Policy 4.210 – The City seeks to maintain ambient noise levels of 55 dBA in existing residential areas.*
- *Policy 4.230 – All noise sensitive land uses in areas with noise levels in excess of 60 dBA shall require acceptable mitigation of noise impacts as a condition of approval.*
- *Policy 4.250 – Noise from all sources should be maintained at levels that will not adversely affect adjacent properties or the community, especially during the evening and early morning hours.*

- *Policy 4.260 – Noise created by temporary construction activities necessary to provide construction or required services should be permitted for the shorted duration possible and limited to time periods that will have the least possible adverse effect on surrounding land uses.*
- *Implementation Measure 4.360 – Encourage use of landscaping and vegetation as noise buffers.*

Construction

Construction of the Project would result in a temporary noise increase associated with the use of construction equipment for the Project for approximately eight to twelve months, generally excluding weekends. As the Project is linear in nature, the noise associated with construction activities would move along the alignment as work is conducted, resulting in intermittent increases at each of the adjacent sensitive receptors during the construction phase that would shift as construction progresses. As described in Section 1.6, construction hours would generally be limited to 7:00 a.m. to 6:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. on Saturdays. Construction would not occur on Sundays.

Noise levels would be consistent with the reference noise levels in Table 8 below. Short-term use of construction equipment is consistent with the existing noise setting and partially active railroad and related uses.

Table 8 Construction Equipment Reference Noise Levels as Measured at 50 Feet

Equipment	Noise Level (dB[1])	Equipment	Noise Level (dB)
Drill rig truck	84	Jackhammer	85
Horizontal Boring Hydraulic Jack	80	Large Generator	82
Front end loader or Backhoe	80	Paver or Roller	85
Excavator	85	Dump truck	84

Source: Federal Highway Administration, 2006.

The construction phase would be temporary and construction activities would be intermittent and limited to between 7:00 a.m. to 6:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. on Saturdays.

Development of the proposed trail on Madden Lane, Pearl Street, or East Valley Avenue (Alignment Scenario B, C, and D only) would be limited to painting sharrow markings on the roadway and installing signage and would not require use of heavy equipment. Both activities would result in limited, low-level noise and would not conflict with Policy 4.210, which addresses ambient noise levels in existing residential areas. Potential noise impacts generated during the construction phase of these alignment scenarios would be less than significant.

Nighttime construction is not anticipated, however, the possibility for occasional nighttime work periods cannot be entirely discounted. Based on the type and extent of work to be performed, it is conservatively assumed that construction could potentially require work for approximately five nighttime periods. While nighttime construction would be temporary, it would create an increase in nighttime ambient noise levels on adjacent residences and is therefore considered a potentially significant impact. To reduce this potential impact to a less than significant level, Mitigation Measure NOI-1 has been incorporated into the Project.

Operation

Once the Project is constructed, noise associated with the operation of the trail would generally consist of typical human speech, sporadic dog barks, and use of non-motorized modes of transportation including bicycles, scooters, and skateboards. The use of motors, pumps, or other mechanical appurtenance capable of creating a stationary noise source would not occur. Therefore, operation would not result in noise levels conflicting with the City's General Plan would not occur. Any potential operational impact would be less than significant.

[1] "dB" is a weighted decibel measurement for assessing hearing risk and, therefore, is used by most regulatory compliance.

Mitigation

Implementation of Mitigation Measure NOI-1 requires the City to reduce fire hazards related to trail construction.

Mitigation Measure NOI-1: Reduce Nighttime Construction Noise Levels

If nighttime construction is required for the Project, the City and its contractor shall implement best management practices to reduce construction noise levels emanating from construction activities and minimize disruption and annoyance at existing noise-sensitive receptors in the project vicinity. Specific measures that can be feasibly implemented to include, but are not limited to, the following:

- Provide advance notice to nearby residents within 250 feet prior to starting nighttime work, with information regarding anticipated schedule, hours of operation and a project contact person.
- A designated project liaison shall be responsible for responding to and resolving noise complaints.
- Best available noise control practices (including mufflers, intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds) shall be used for equipment and trucks to minimize construction noise impacts.
- Stationary noise sources shall be located as far from sensitive noise receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used. Enclosure openings or venting shall face away from sensitive noise receptors.
- Schedule work and deliveries to minimize noise-generating activities during nighttime hours at work sites (e.g., no deliveries or non-essential work).
- To the extent consistent with applicable regulations and safety considerations, operation of vehicles requiring use of back-up beepers shall be avoided near sensitive receptors during nighttime hours and/or, the work sites shall be arranged in a way that avoids the need for any reverse motions of large trucks or the sounding of any reverse motion alarms during nighttime work. If these measures are not feasible, trucks operating during the nighttime hours with reverse motion alarms shall be outfitted with SAE J994 Class D alarms (ambient-adjusting, or “smart alarms” that automatically adjust the alarm to 5 dBA above the ambient near the operating equipment).

With implementation of Mitigation Measure NOI-1, construction noise levels associated with potential nighttime construction would be reduced to a less-than-significant level.

b) Result in generation of excessive groundborne vibration or noise levels? (Less than Significant)

The Project Area is an existing railroad corridor, which includes active railroad usage. Railroad usage, by its nature, is vibratory. Aside from the Skunk Train Station, there are no structures within the railroad corridor. Industrial, commercial, and residential properties are located adjacent to the Project Area. Construction on residential streets would be limited to painting sharrow markings and installing signage and thus would not require vibratory construction methods.

Project-related activities would not involve the use of explosives or other intensive construction techniques that could generate significant ground borne vibration or noise. No pile driving is anticipated; however, the Project may utilize a vibratory roller, large bulldozer, and jackhammer. Per the Caltrans (2020) Construction Vibration Guidance Manual, different types of construction equipment result in differing levels of vibration (Table 9). Of the machinery to be used to construct the Project, a vibratory roller would result in the highest peak particle velocity (PPV), referenced at 25 feet from the source.

Table 9 Vibration Source Amplitudes for Construction Equipment (from Caltrans 2020)

Equipment	Reference PPV at 25 ft (inches/second)
Vibratory roller	0.210
Large bulldozer or caisson drilling	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small bulldozer	0.003
Crack-and-seat operations	2.4

Caltrans (2020) also identifies thresholds for vibration damage potential. Vibratory compaction equipment is defined in Caltrans (2020) as a continuous/frequent intermittent source, although such equipment would be required only briefly to complete construction of the trail. Thus, application of the higher continuous/frequent intermittent source threshold has been conservatively applied to vibration-related impact analysis. The continuous/frequent intermittent source threshold for historic buildings and older residential structures is 0.25 PPV. The continuous/frequent intermittent source threshold for modern industrial and commercial buildings and new residential structures is 0.5 PPV. Thus, the most vibratory equipment to be used (vibratory roller at 0.210 PPV) is conservatively lower than all applicable thresholds for damage to structures along the Project alignment. Any potential impact related to structures resulting from groundbourne vibration would be less than significant.

Caltrans (2020) also identifies thresholds for vibration annoyance to people. At 0.210 PPV, a vibratory roller would fall between strongly perceptible and severe based on the guidelines summarized in **Error! Reference source not found.** using the conservative continuous/frequent intermittent source thresholds. The loud noise and vibration resulting from vibratory equipment would be limited during construction of the Project and limited to daytime hours. At the most proximal location, Alignment Scenario B and C propose construction of a Rail Trail along the western railroad track, which is approximately 45 feet away from residences along Railroad Avenue (estimated from edge of track to the front edge of residences). The other alignment scenarios would require construction 75 feet to 100 feet away from the residences on Railroad Avenue. The distance between the use of a vibratory roller to complete trail paving and the residences would diminish any potential impact related to vibration to a less than significant effect.

Table 10 Guideline Vibration Annoyance Potential Criteria (from Caltrans 2020)

Human Response	Transient Sources Max. PPV (in/sec)	Continuous/Frequent Intermittent Sources Max. PPV (in/sec) *Impact Analysis Threshold*
Barely Perceptible	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strong Perceptible	0.9	0.10
Severe	2.0	0.4

Following construction, operation of the Project would not result in substantial sources of groundborne vibration or groundborne noise. Project operation would not generate vibration, except in instances where larger repairs to the trail might be required. These conditions would be short-term and temporary (taking from one to several weeks to complete depending on the extent of damage or other circumstances) and lower than thresholds for damage to structures along the Project alignment; therefore, the operational impact would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (No Impact)

The Project Area is located approximately three miles from the Willits Municipal Airport. The Project is not located within an area covered by the Mendocino County Airport Comprehensive Land Use Plan (Mendocino County 1996). Therefore, the Project would not expose people residing or working in the Project Area to excessive air-traffic related noise levels. No impact would result.

3.14 Population and Housing

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (Less than Significant Impact)

The Project would not induce substantial unplanned population growth because it does not propose new homes, businesses, roads or extension of utilities that would result in direct or indirect population growth. The Project is intended to serve the existing community and future regional usage of the Great Redwood Trail but is not considered growth inducing. Given the modest level of construction required for the Project, it is reasonable to anticipate that workforce requirements for construction can be met through the local labor force within the region. Maintenance of the proposed trail would be performed by existing City staff. Due to these reasons, the Project would not induce population growth directly or indirectly, and the impact would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (No Impact)

Implementation of the Project would not displace existing housing units or residents. The construction of replacement housing would not be necessary. No impact would result.

3.15 Public Services

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) 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:				
Fire Protection?			X	
Police protection?			X	X
Schools?				X
Parks?				X
Other public facilities?			X	

a) 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 public services? (Less than Significant)

As discussed in Section 3.14 (Population and Housing), implementation of the Project would not induce population growth and, therefore, would not require expanded fire or police protection facilities to maintain acceptable service ratios, response times, or other performance objectives. The Project would not result in an increase in student population, and therefore, no new or expanded schools would be required.

As a non-motorized transportation facility, the Project would not necessitate any related new or altered public service facilities. The Project would solely be used for recreational purposes. The Project would facilitate an increase in bicycle, foot, and other non-motorized travel. The Project is not expected to substantially increase the need for patrols by local law enforcement or emergency services. The Project may ultimately have the beneficial effect of reducing the need for patrol by encouraging more formalized and regulated public use and discouraging existing transient activity in the area. The potential impact related to fire and law enforcement would be less than significant.

The Project would present a new passive recreational opportunity by increasing connectivity within the community and encouraging residents in the vicinity to utilize the Class I Trail for non-motorized travel. The Project would not result in the increased use of existing parks or other public facilities as it would not induce population growth. Aside from the proposed Project, no additional expansion of recreational facilities would be required. The Project does not include any new or expanded parking areas associated with either trailhead. No impacts to parks would result. Operationally maintenance of the trail is within the City's existing capacity. The potential impact related to public services would remain less than significant.

3.16 Recreation

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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?			X	
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?			X	

The Project proposes a new recreational amenity within the City of Willits. The proposed trail would increase non-motorized transportation in the area making it convenient and safer for users to travel throughout the City of Willits and provide additional recreational opportunities for trail visitors. The Project Area is within a half mile of other recreational facilities, including Babcock Park, Highway Twenty Park, Recreation Grove Park, Rodeo Grounds, Skatepark, and baseball/soccer grounds and is intended to improve connectivity with the Haehl Creek Trail on East Hill Road, south of the Project Area.

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? (Less than Significant)

The proposed Project could result in more people in the Project Area utilizing local and regional parks and other recreational facilities. As noted above, the Project Area is within a half mile of multiple parks and other recreational grounds. Given the number of existing park and recreational options available in the Project Area, the Project would not increase use of a park such that substantial physical deterioration would result. As stated in Section 3.14, Population and Housing, the Project would not induce substantial unplanned population growth because it does not propose new homes, businesses, roads or extension of utilities that would result in direct or indirect population growth. Therefore, it is not expected to substantially increase the usage of or demand for existing neighborhood and regional parks or other recreational facilities. The impact would be less than significant.

The proposed trail is a recreational facility that could encourage the construction of other reasonably foreseeable recreational facilities, predominantly other connecting trails or related amenities. Such future projects would be subject to CEQA review and other environmental approvals, as applicable, once proposed.

b) Include or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (Less than Significant)

The Project would create a recreational facility where there was none prior (i.e., within the specified Project Area). The potential environmental impacts associated with construction of the proposed recreational facilities are evaluated as part of this Initial Study. With implementation of the recommended mitigation measures identified in this Initial Study, the Project impacts on the environmental would be reduced to less than significant.

3.17 Transportation

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				X
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

The Project would provide a Class I Trail (pedestrian and bicycle trail) between Highway 101 and State Route 20, the two main north-south transportation corridors in the City of Willits.

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (Less than Significant)

Construction

Construction would result in vehicle trips by construction workers and haul-truck trips for material off-haul and deliveries via Highway 101. Construction-related traffic would be temporary, would vary daily, and would be distributed over the course of a work day and work week. The number of construction-related vehicles traveling to and from the Project Area would vary on a daily basis. As described in Section 1.6, construction hours would generally be limited to 7:00 a.m. to 6:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. on Saturdays. Construction would not occur on Sundays. Nighttime construction is not anticipated, however, the possibility for occasional nighttime work periods cannot be entirely discounted. Based on the type and extent of work to be performed, it is conservatively assumed that construction could potentially require work for approximately five nighttime periods. Due to the infrequency of truck traffic and the temporary nature of construction, Project construction is not anticipated to conflict with plans, policies or programs related to the effectiveness of the circulation system. Please see Transportation Impact c in this section for additional evaluation of construction-related impacts.

Operation

Once complete, the proposed Project is not expected to increase vehicle traffic on local streets, as it would not increase the area's population or redirect on-road traffic patterns. The Project would support increased non-motorized travel to and from the area by trail users. The Project would not conflict with effective circulation system performance or intersection level of service standards. Maintenance of the trail is anticipated to be performed by City staff. It is anticipated that Project operation and maintenance would generate minimal traffic trips, as motorized access would be limited to light maintenance, police, and emergency service vehicles.

The City of Willits Bicycle and Pedestrian Specific Plan (City of Willits 2009) identifies the Project alignment as a portion of the GRTA (formerly NCRA) Rail Trail, and as an important north-south link for bicyclists on the east side of town. Therefore, the Project is consistent with the Bicycle and Pedestrian Specific Plan.

Willits Safe Routes to School Action Plan

Additionally, the Willits Safe Routes to School Action Plan identifies creating a Class I Trail along the Railroad Avenue corridor, including Railroad Avenue and areas to the southeast along a potential future street alignment, as an

improvement recommendation. The Project would not conflict with the Safe Routes to School Action Plan. The alignment is identified by the plan with a '3' score for safety enhancement, community support, and walking and bicycling potential (City of Willits 2017a). Level 3 score indicates (for the respective sections):

- **Safety Enhancement:** Project is expected to improve pedestrian and/or bicyclist safety greatly
- **Community Support:** Project was identified as high priority by multiple community members during Safe Routes to School Launch workshop or other community planning process
- **Walking and Bicycling Potential:** Project would serve three or more schools.

Baechtel Road – Railroad Avenue Corridor Community Design Study (2003)

The Project alignment overlaps the northern, Railroad Avenue portion of the Baechtel Road – Railroad Avenue Corridor Community Design Study (Community Design Study) area. As stated in the Community Design Study, the purpose of the study is to prepare a conceptual community design for the construction of a road which would connect Baechtel Road and Railroad Avenue on the east side of the City. The Community Design Study also serves as a feasibility study to help facilitate a Creekside trail with pedestrian and bicycle traffic that would be integrated into a Citywide network, and provide a link connecting the housing, employment and recreational facilities on the east side of the City. The Community Design Study includes a recommendation for a 10-foot-wide sidewalk be added to the east side of a replacement bridge on the southern section of Railroad Avenue across Baechtel Creek, as well as minimum sidewalks of 6 feet wide across a replacement bridge across Broaddus Creek.

As described in Section 1.3, the Project would construct an approximately 1.6-mile Class I Trail that would provide connection between the southern and the northern parts of the City. The Project would include a 10-foot-wide sidewalk through the Project alignment and new or upgraded bridge crossings at Broaddus Creek, Baechtel Creek, and Haehl Creek. Therefore, the Project is consistent with the design elements and would not conflict with the Community Design Study.

Downtown Willits Streets and Alleys Connectivity Study (2017)

The Project alignment overlaps the northern Madden Lane portion of the Downtown Willits Streets & Alleys Connectivity Study (Connectivity Study) area. The Connectivity Study considers accessibility improvements to create a continuous path of pedestrian travel and addressing accessibility gaps on Madden Lane. The Connectivity Study also identifies the need to provide new pedestrian crossings over Northwest Pacific Railroad tracks along both north and south sides of Commercial Street (City of Willits 2017b). The Project would construct a 10-foot-wide sidewalk that would improve accessibility and provide a continuous path of travel through the area. Therefore, the Project would not conflict with the design elements identified in the Connectivity Study.

Mendocino County Rail-with-Trail Corridor Plan (2012)

The Project alignment is consistent with the locations of Segment No(s) C6, C7, C8 of the Mendocino County Rail-with-Trail Corridor Plan's proposed Class I Trail in the City of Willits (MCOG 2012).

Based on the review, the proposed Project: (1) would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system; (2) would take into account all modes of transportation, including mass transit and non-motorized travel; and (3) would take into account other components of the transportation system, such as intersections, streets, pedestrian pathways, and bicycle pathways. Therefore, the operational impact would be less than significant.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (No Impact)

CEQA Guidelines Section 15064.3 (Determining the Significance of Transportation Impacts) specifies that Vehicle Miles Travelled (VMT) is the primary metric or measure of effectiveness for determining the significance of transportation impacts across California. VMT refers to the amount and distance of automobile travel attributable to a project. The Governor's Office of Planning and Research (OPR) has published a Technical Advisory on Evaluating

Transportation Impacts in CEQA (OPR 2018) which contains guidance on methodology and recommendations for establishing screening criteria and thresholds for VMT evaluation, which is used to evaluate impacts in this Initial Study. OPR's Technical Advisory specifies that transportation impact analysis be based on either a project's VMT per capita (or other efficiency metric like VMT per household, per employee) or total VMT change (before and after project). As noted in OPR's Technical Advisory, projects that would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis, include addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel (OPR 2018). The Project would construct a Class I Trail (pedestrian and bicycle trail). The Project does not include new or expanded parking facilities at either trailhead. The Project would not add additional motor vehicle capacity to the roadway network and would not lead to additional vehicle travel.

The proposed Project does not include any component that could be characterized as resulting in a potential increase to VMT. To the contrary, the Project would promote multi-modal transportation. By its nature, the Project is VMT-reducing. By promoting multi-modal transportation, the Project will reduce VMT throughout the Project Area and would thus not result in an environmental impact under CEQA. Instead, the Project would result in an environmental benefit by reducing the existing VMT in the City.

PRC 21099 (b) (1), upon which the CEQA VMT guidance is based, specifically states the purpose of the VMT criteria is to promote, "the development of multimodal transportation networks," consistent with the fundamental goals and objectives of the Project. Similarly, the OPR Technical Advisory notes the overall purpose of updating CEQA to include VMT analysis is to help achieve California's long-term criteria pollution and greenhouse gas emission goals, based on four strategies that include, "plan and build communities to reduce vehicular greenhouse gas emissions and provide more transportation options (OPR 2018)," which is also directly supported by the Project's goals and objectives related to multi-modal transportation.

Thus, the Project is consistent with the expectations of the OPR guidance for evaluating transportation impacts in CEQA. Lastly, the OPR guidance clarifies that when evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new transit users as an adverse impact. Therefore, any success the Project ultimately achieves to increasing multi-modal transit (e.g., additional pedestrians and bicyclists using the trail) would not be considered an environmental impact under CEQA. No impact would result.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Less than Significant)

Construction

Temporary lane closures of City streets may be required for crossing upgrades and would require an Encroachment Permit from the City. A site-specific, MUTCD compliant Traffic Control Plan would be required in accordance with City requirements for an Encroachment Permit. The City of Willits Design and Construction Standards specifies requirements for construction-area traffic control devices. Implementation of Project traffic controls would be implemented during construction in accordance with City requirements, which would include the use of traffic controls, signs, and flaggers; scheduling of major street/lane closures during off-peak hours, establishment of detour routes, message boards, pedestrian and bicycle control measures, and other measures. Through required compliance with City of Willits traffic control requirements and implementation of the Traffic Control Plan, construction activities would not result in substantial adverse effects or conflicts with the local roadway system. The impact would be less than significant.

Operation

The Project would not change the geometry of the street or roadway network. Therefore, no potentially hazardous roadway design features would be introduced by the Project. The alternate alignment where the trail users would interface with motorized vehicles, would be designed as a shared use path to CAMUTCD and Caltrans design standards. At a minimum signing, sharrow markings, and striping would be added along the roadway notifying all people of the shared use. Along Railroad Avenue, there is the potential of adding a lane to the roadway along the east

side and striping it for a dedicated bicycle/pedestrian lane. Along Madden Lane, striping would be added to show a shared use, as there is not adequate horizontal space to dedicate a lane to bicycle/pedestrian use.

The trail would be a paved pathway Class I facility, alternating between an approximately ten-feet wide trail (five feet per travel lane) with 2-foot shoulders. The trail may be narrowed in limited locations where unavoidable site constraints exist.

The MCOG's 2012 Mendocino County Rail-with-Trail Corridor Plan (MCOG 2012) identifies corridor design parameters for Rail with Trail (RWT). The parameters outline the minimum standards and general requirements for the RWT. The design strategies are defined as physical RWT configuration or alignment treatments intended to reduce conflicts and/or increase overall safety on RWTs. The parameters include standards to reduce potential conflicts associated with steep grades, grade changes, high speeds, turns/corners, roadway crossings, RWT width and passing space, multiple concurrent users (such as pedestrians and bicyclists), and other potential sources of conflict. The Project trail design is consistent with the MCOG RTW parameters.

As described in Section 1 (Project Information), the Project would be designed in accordance with GRTA (formerly NCRA) design standards and the Caltrans *Highway Design Manual, 7th Edition* (2020). In addition, the Project would be designed in accordance with other specific applicable standards, including the *California Manual on Uniform Traffic Control Devices* (CA MUTCD 2020) and the 2010 Americans with Disabilities Act Standards for Accessible Design. Existing street crossings may be enhanced with *California Manual on Uniform Traffic Control Devices* (CA MUTCD) standards, such as LED signs. Signage and markings at public street crossings would be updated as required by the CPUC. Railroad crossings within City street crossing would remain unaltered, except when providing connections to existing pedestrian facilities (including curb, gutter and sidewalk) located adjacent to the trail. Consistent with applicable design standards, crossings would include detectable warning surfaces.

The proposed trail may have potential conflicts between users who are stationary (such as birdwatchers) and bicyclists due to the difference in these activities. However, since the proposed trail would have striping, signage, and unpaved shoulders on both sides which could be used by birdwatchers and other uses who want to get out of the main travel lanes, substantial safety related conflicts between trail users and stationary individuals would be avoided.

Based on the information above, the proposed Project would not substantially increase hazards due to a design feature; therefore, the impact is less than significant.

d) Result in inadequate emergency access? (Less than Significant)

The proposed Project trail alignment would be adjacent to existing streets. Emergency access to the Project Area already exists from these streets, and would continue to exist under the proposed Project during both construction and operation. Bollards would be placed at trail intersections and entrances to prevent all but emergency and maintenance vehicles from entering. Since the trail alignment corridor is already served by emergency and law enforcement personnel, the proposed trail would not slow or hinder emergency response, would not require additional emergency services, and would maintain emergency access to all trail segments Some alignment scenarios would involve limited work on residential streets to paint sharrow markings and install signage, which would generally be brief. Ground disturbance on residential streets would not occur. Painting sharrow markings, striping, and installing signage on residential streets would be brief in nature and would not impede emergency access or evacuation routes. The potential impact to emergency impact resulting from train construction would remain less than significant.

Following construction, all properties along the Project alignment would continue to have emergency access. Operation and maintenance of the Project would not result in substantial additional daily traffic from maintenance activities or truck trips along local roadways, and would, therefore, not affect emergency services or response times in the area. Additionally, no roadway closures would occur during normal operation of the Project. No operational impact on emergency access would result.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k)?				X
b) Cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.				X

a,b) Cause a substantial adverse change in the significance of a tribal cultural resource? (No Impact)

CEQA requires lead agencies to determine if a project would have a significant effect on tribal cultural resources. The CEQA Guidelines define tribal cultural resources as: (1) a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or eligible for listing on the California Register of Historical Resources, or on a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant according to the historical register criteria in Public Resources Code Section 5024.1(c), and considering the significance of the resource to a California Native American tribe.

As part of the AB 52 process, the City sent notifications for the opportunity to consult to appropriate tribal governments as identified by the Native American Heritage Commission. Notifications were distributed on December 2, 2021 to the Middletown Rancheria of Pomo Indians and the Torres Martinez Desert Cahuilla Indians. A 30-day period allowing for a request for consultation ended with no request made for consultation. Tribal historic resources were thus not identified.

Additionally, DZC Archaeology & Cultural Resource Management contacted the NAHC on October 12, 2021, to request a review of their Sacred Lands Files. The NAHC staff responded by email on December 6, 2021, stating that the Sacred Lands File search was negative, and provided a list of Tribal representatives and individuals to be contacted regarding the Project. On January 10, 2022, DZC sent Request for Comment letters to the following Native American representatives as part of the Cultural Resources Inventory Report prepared for the Project (DZC 2022):

– Bear River Band of the Rohnerville Rancheria
– Cahto Tribe
– Cahto Tribe
– Coyote Valley Band of Pomo Indians
– Guidiville Indian Rancheria
– Habematolel Pomo of Upper Lake
– Hopland Band of Pomo Indians
– Hopland Band of Pomo Indians
– Kashia Band of Pomo Indians of the Stewarts Point Rancheria

- Manchester band of Pomo Indians
- Noyo River Indian Community Chairperson
- Pinoleville Pomo Nation
- Potter Valley Tribe
- Redwood Valley or Little River Band of Pomo Indian
- Robinson Rancheria Band of Pomo Indians
- Round Valley Reservation/ Covelo Indian Community
- Sherwood Valley band of Pomo Indians
- Yokayo Tribe

As of January 31, 2022, no responses have been received by DZC (2022). Standard procedures for inadvertent discovery of cultural resources and/or human remains, as identified in Section 3.5, Cultural Resources, will be implemented during Project construction. No impact to tribal cultural resources would result.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Less than Significant)

The Project would not alter wastewater characteristics or result in an increase in the generation of wastewater. The Project would not result in an increased demand for water, natural gas, or telecommunications facilities. Similarly, the Project would not result in an increase in generation of wastewater. Therefore, the Project would not require or result in the construction of other water, wastewater treatment, natural gas, or telecommunications facilities or expansion of existing facilities. The Project would utilize electricity for the proposed trail lighting (refer to Section 1.5, Project Elements). Electrical connections to existing electrical lines in the vicinity of the Project would occur in select locations. Electrical connections would be constructed and maintained in accordance with all rules and regulations; therefore, installation of electrical connections would not cause significant environmental effects.

It is not anticipated that any temporary utility extensions, such as electric power or water, would be required for trail construction. The Project may result in relocation of utilities during project construction. Specifically, installation of passive pedestrian control systems at street crossings may require relocation of subsurface utilities, such as water or wastewater lines. Installation of street lights in discrete locations along the trail alignment may require electrical utility modifications to extend power where required.

The Project would be designed to maintain existing drainage patterns and would typically have a two percent or less cross slope to allow surface water to flow off the trail surface. The trail would drain away from the existing rail, toward and existing storm drainage facility or natural drainage condition, crossing a pervious transition area before draining into the natural drainage. In cases where the trail's fill prism encroaches into existing drainage ditch(es), the drainage ditch may need to be reconstructed at approximately the same grade and depth, but at a location (horizontally) offset from the original position. Cross drains or culverts under the trail or creek crossings would be located at low spots in the topography to convey surface drainage across the trail prism. The construction of these improvements has been

evaluated throughout this Initial Study. No additional storm drain improvements or utility improvements beyond those identified as necessary for the Project and evaluated in this Initial Study would be required. The impact would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (No Impact)

The proposed Project would not create an increased demand for domestic water service. The Project would require relatively small quantities of water during the construction phase (e.g., for dust control and concrete/asphalt applications). The Project's water demands would not be substantial and can be met by existing entitlements and resources. The Project would not induce population growth or result in land uses that would increase demand for water supplies. Therefore, the Project would not result in the need for the construction of new water facilities, or the expansion of existing facilities. No impact would result.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (No Impact)

The Project does not involve sewerage facilities or wastewater treatment and would not impact existing municipal sewerage infrastructure or result in a demand increase on existing wastewater treatment capacity. Restrooms are not included in the Project. No impact would result.

d, e) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (Less than Significant)

The solid waste provider in the area is the Solid Wastes of Willits (SWOW). The Project is not expected to generate a substantial increase of solid waste disposal needs. The proposed trail would generate limited solid waste during construction. Waste generated during construction would be hauled off-site for re-use or disposal as required by federal, State, and local regulations. Materials that could not be reused or composted would be disposed of at a local transfer station or solid waste facility. Solid waste generated during Project construction would represent a very small fraction of the daily permitted tonnage of disposal facilities and would be sufficiently accommodated by existing landfills. The construction-related impact would be less than significant.

The Project would include waste receptacles, spaces for recycling bins, and pet waste stations. Solid waste collected as a part of the Project would be disposed of by the SWOW. SWOW trucks solid waste produced in the City of Willits and other portions of Mendocino County to State licensed landfills in compliance with local, State, and federal regulations pertaining to solid waste disposal. These facilities have sufficient capacity to serve the Project's solid waste disposal needs. The operational impact would be less than significant.

3.20 Wildfire

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?		X		
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes?				

The City of Willits and the Project Area are located in a Local Responsibility Area (LRA) served by the Little Lake Fire Protection District and the Willits Volunteer Fire Department. The Little Lake Willits Fire Department station is location within a quarter mile of the southern portion of the Project Area. The Project Area is mapped as a moderate fire hazard severity zone (Cal Fire 2007, City of Willits General Plan Safety Element 2019). The City and Project are located within a wildland-urban interface (WUI), which are areas of increased threat to people and buildings due to their proximity and encroachment into natural areas. Areas to the west and south of the City of Willits are in a State Responsibility Area (SRA) and are generally identified as zones of high and moderate fire hazard (California Board of Forestry and Fire Protection 2022, Cal Fire 2022). The closest Cal Fire station is approximately a 5-mile drive from East Hill Road.

a) Substantially impair an adopted emergency response plan or emergency evacuation plan (Less than Significant)

The City of Willits Emergency Operations Plan (EOP) identifies the City's emergency response and evacuation policies and procedures for hazards including interface wildlife fire (City of Willits 2007). The City is located in Planning Area 1. Additionally, a draft Emergency Evacuation Plan was developed for the Oak Fire in 2020, which identifies evacuation zones and routes (City of Willits 2020). The Project Alignment is located within three evacuation zones (Zones 18, 19, and 20) and the trail's northern and southern ends terminate at evacuation routes along East Commercial Street and East Hill Road. Evacuation Routes generally direct people to North Main Street and South Main Street and then to Route 20 or Highway 101. The Project will not cause the closure of lanes on designated evacuation routes. There will be no ground disturbance outside of the railroad corridor. Construction activities on residential streets will be limited to painting sharrow markings, striping, and installing signage. Operationally, the trail would be accessible to first responders. Therefore, the proposed Project does not impair implementation or physically interfere with the EOP of draft Emergency Evacuation Plan.

Mendocino County has adopted the multiple plans related to emergency response, hazard management and mitigation, or emergency evacuation, in which hazards or plans for the City of Willits are included. County plans include, but are not limited to: Mendocino County Community Wildfire Protection Plan (CWPP) (MCFSC 2015), Mendocino County Operational Area Emergency Operations Plan (2016), Mendocino County Multi-Jurisdictional Hazard Mitigation Plan (Mendocino County 2021), and the Mendocino County Fire Vulnerability Assessment and Emergency Preparedness Plan (Mendocino County 2021b). The Mendocino County Evacuation Plan identifies wildfire

as potential major hazard that could require evacuation from the City of Willits (Mendocino County 2020a). The City is located in Evacuation Planning Area 1, which is also consistent with the CWPP and Cal Fire Unit Plan. The Project is located in Evacuation Zones 1A and 1B, which were established primarily for wildfire evacuations. Primary evacuation routes are Highways 101 and 162. Willits High School on North Main Street is located approximately 0.3 miles from the Project Area and is identified as an emergency evacuation shelter.

Project construction primarily occurs on a railroad corridor and would not impede emergency access or evacuation routes, as discussed in Section 3.9 (Hazards and Hazardous Materials). Construction on residential streets would be short term and would not require ground disturbance. Trail construction on residential streets would be limited to painting sharrow markings, striping, and installing signage. Residential streets included in alignment scenarios do not overlap designated evacuation routes. Therefore, the Project would not impair implementation of or physically interfere with emergency response or evacuation identified in the plan. Any potential impact would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? (Less than Significant with Mitigation)

The trail would be located in the railroad corridor within a fairly flat topographical area. The Project Area consists of slopes less than 5% (GHD 2021b). Some grassland and other vegetation are present along the alignment. Residential buildings also are located along some alignment scenarios. The only associated steep slopes in the Project Area are associated with three creeks. The proposed trail would cross above each creek via a bridge, following a similar grade as the existing railroad or vehicular bridge.

It is possible that fire ignition could occur in the vegetated portions of the Project Area during construction (e.g., related to heavy machinery usage). Given the vegetation in the Project Area and the proximity of nearby residences, the construction-related impact is considered significant. During construction, all hazardous materials and construction equipment would be appropriately used and stored pursuant to all required State and local regulations. Implementation of Mitigation Measure HAZ-2 would reduce the potential impact of construction activities on wildland fires to a less-than-significant level by requiring the use of construction techniques that minimize fire risk.

Following construction, the Project would not alter site topography in a manner that exacerbates wildlife risk or exposure of the public to pollutants in the event of an uncontrolled wildlife. No new chemicals or hazardous materials would be used operationally such that the increase of pollutant exposure in the event of an uncontrolled wildfire would not increase above existing conditions. Most trail users would be within the Project Area for a short period of time given the purpose is for passive recreational and non-motorized transportation use. The formalization of a trail could reduce transient encampments throughout the Project area, which could also reduce existing wildfire ignition risk from transient warming fires. According to the City's General Plan Safety Element, the operation of the Skunk Train ignites fires along the railroad ROW three to five times per year. Due to the expected intermittent use of the site by pedestrians, that the Project does not provide any structures to be used for human occupancy, and the fact that the Project is located within an area of "moderate" fire risk, it is not anticipated to exacerbate wildfire risks and thereby expose users to pollutants. The operational impact would be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (Less than Significant)

Development of the trail would not result in a need to expand infrastructure to the Project Area or in the immediate vicinity of the Project. The Project would not require additional roads, fuel breaks, emergency water sources, power lines or other utilities. Electrical connections for street lights would occur in select locations but would not increase fire risk. Operation and maintenance activities currently occur under existing conditions and, following construction, the Project would not result in the need for substantial additional operation and maintenance activities. Therefore, the Project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. Any potential impact would be less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes? (Less than Significant)

The Project Area is located within a low slope area of topography. The Project Area consists of slopes less than 5% (GHD 2021b). Portions of the Project Area are vegetated with grassland as well as mature trees. Residences adjacent to proposed Project Alignments are not located near slopes. The only associated steep vegetated slopes in the Project Area are associated with three creeks that would cross under the proposed trail bridge or existing bridge modifications. As noted in Section 3.10 (Hydrology and Water Quality), bridge construction or modification would not lower the bridges within closer proximity to the creeks, would not impede the existing flood hydrology of the waterways, and would not alter the channel geometry, floodplain topography, or existing flood setting of the waterways. If a wildfire were to occur, post-fire slope instability would be unlikely. Furthermore, following completion of construction, the drainage pattern of the Project Area would be similar to existing conditions. Any potential impact would be less than significant.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Does the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) 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)?			X	
c) Have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?			X	

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Less than Significant Impact with Mitigation)

Potential Project impacts to biological and cultural resources are addressed in Section 3.4, Biological Resources, Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources, respectively. With implementation of the recommended mitigation measures identified in this Initial Study, the potential for Project-related activities to degrade the quality of the environment, including wildlife species or their habitat, plant or animal communities, or important examples of California history or prehistory would be reduced to less-than-significant levels.

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)? (Less than Significant)

Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355). Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. As discussed in Section 10.11, Land Use and Planning, the Project is consistent with the goals and policies of the City of Willits General Plan, the Bicycle and Pedestrian Specific Plan, and Safe Routes to School Action Plan. The establishment of a Class I Trail in the City would promote non-motorized transportation, recreation, and safe routes to schools for the public, which are goals of the City.

Table 11 provides a list of past, present, and reasonably foreseeable future projects within and near the Project Area in the City, including a brief description of the projects and their anticipated construction schedules (if known). Single-

family homes and other similar small-scale uses were not included because of their negligible cumulative effects. Identified projects are summarized in Table 11.

Table 11 Projects Considered for Cumulative Impacts

Project Name and Location	Project Description	Estimated Construction Schedule	Relevancy to the Project's Potential Cumulative Impacts
Caltrans Bypass Project *Located less than 0.25 mile east of Project*	Caltrans is in the process of completing a new segment of Highway 101 that will detour around the City of Willits. The bypass is expected to reduce traffic congestion in the City and its downtown.	Construction Complete. Mitigation and relinquishment work will be completed over the next few years.	**Applicable**. The Bypass Project resulted in identified biological impacts associated with riparian habitat associated with creek crossings and biological species in the vicinity of the proposed project.
Caltrans Relinquishment Project *Located on Main Street north of Highway 20 to Sherwood Road, approximately 0.3 mile northwest of Project.*	Pedestrian and intersection improvements at or near the intersection of Sherwood Road and N. Main Street.	Construction Complete	**Applicable.** The Relinquishment Project would be located within a developed urban environment, but may include creek crossings or similar biological habitat, or result in biological species impacts similar to the project.
Willits Main Street Corridor Enhancement Plan *Located on Main Street approximately 0.25 mile west of Project.*	Plan with multiple gateway, bicycle circulation, pedestrian safety, Electric Vehicle (EV) infrastructure, transportation facility, Low Impact Development (LID) stormwater management, and beautification components.	Under Construction	**Applicable.** The Willits Main Street Corridor Project would be located within a developed urban environment, but may include creek crossings or similar biological habitat, or result in biological species impacts similar to the project.

As summarized in this Initial Study, the Project would not result in impacts on agriculture and forest resources, land use and planning, and mineral resources. Therefore, implementation of the Project would not contribute to any related cumulative impact on those resources.

An analysis of potential cumulative impacts for the projects summarized in Table 11 is provided below. The impacts of the proposed Project related to aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and wildfire would be mitigated to a less-than-significant level. Incremental impacts, if any, would be very small, and the cumulative impact would be less than significant. Because the proposed Project would not result in significant impacts after mitigation, and because the proposed Project is a Class I Trail project rather than a development project that could add to existing and future population growth and development in the area, the proposed Project would not substantially contribute to any significant cumulative impacts which may occur in the area in the future. Therefore, the impact would be less than significant.

Aesthetics

As discussed in Section 3.1, Aesthetics, the Project would have no impact on scenic vistas or scenic resources. The Project would generate a less than significant impact light or glare impact. Because the Project would minimize light emissions and not cause substantial new glare, the Project's cumulative contribution to light and glare would be similarly less than significant. Aside from the required fencing, which would not be continuous, the Project is visually compatible with the railroad corridor and, with incorporation of Mitigation Measure BIO-8 into the Project, the visual impact of vegetation removal is less than significant. Any cumulative impact to aesthetics, both resulting from construction and operations, would be less than significant.

Air Quality, Greenhouse Gases, and Energy

By their nature, air pollution, greenhouse gas emissions, and energy usage are largely cumulative impacts. As discussed in Section 3.3, Air Quality, with incorporation of Mitigation Measure AIR-1, the Project will not conflict with or obstruct applicable air quality plans. Additionally, the Project would not exceed MCAQMD's recommended thresholds of significance for criteria air pollutants. A project that will not exceed the MCAQMD's thresholds of significance on a project level also will not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. This impact will be cumulatively less than significant.

As described in Section 3.8, Greenhouse Gas Emissions, the Project-related greenhouse gas emissions will not exceed the MCAQMD's recommended threshold of significance for greenhouse gases. Additionally, the Project would not impede the state in meeting Senate Bill (SB) 32 year 2030 greenhouse gas reduction goals. Therefore, the Project's contribution to cumulative greenhouse gas impacts will not be cumulatively considerable, and therefore will be less than significant.

As discussed in Section 3.6, Energy, construction will not encourage activities that will result in the use of large amounts of fuel and energy in a wasteful manner. Operation of the Project will utilize fuels from the movement of employees and maintenance equipment, consistent with normal functioning of a typical trail facility. The operation of the Project will not result in inefficient, wasteful, or unnecessary consumption of fuels or other energy resources. Therefore, the Project's contribution to cumulative energy impacts will not be cumulatively considerable, and therefore will be less than significant.

Biological Resources

As discussed in Section 3.4, Biological Resources, a Biological Resources Report (BRR) was prepared to evaluate baseline environmental conditions within the Project Area and to determine the potential for special status plants, wildlife species, or Sensitive Natural Communities (SNCs) to occur. Information in the BRR was compiled through a review of literature and database searches. A wildlife habitat assessment, field surveys for special status plants, and mapping of riparian habitat and SNCs occurred and is summarized in the BRR. A delineation of aquatic resources (wetlands, creeks, etc.) within the Project Area footprint was conducted, and three-parameter wetlands and three seasonal water courses were observed.

The Project has the potential to impact fish, amphibians, reptiles, nesting birds, bats, mammals, riparian vegetation, wetlands, SNCs, and trees. These potential impacts include temporary harassment, temporary disturbance of habitat, and incidental take caused by earthwork near waterways, removal of vegetation, movement of construction equipment, and filling of wetlands. These potential impacts will be reduced to a less-than-significant level with implementation of Mitigation Measures BIO-1 through BIO-9 listed above.

The projects listed in Table 11 are similarly expected to cause potential impacts to biological resources. All cumulative projects will be required to implement BMPs to control construction-related erosion which will reduce the potential for sedimentation and turbidity impacts. In addition, the projects will comply with Section 401 permits as appropriate which will also reduce any potential for water quality impacts. Additionally, the project will be required to implement mitigation measures pursuant to CEQA. Therefore, no cumulative impact to biological resources would occur and no additional mitigation is proposed.

Cultural and Tribal Cultural Resources

As discussed in Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources, record searches and field review visits were undertaken to ensure that cultural resources, tribal cultural resources, and human remains that could be inadvertently impacted by Project implementation were identified and mitigation measures are included that would reduce impacts to a less-than-significant level. Efforts to identify tribal cultural resources that could be affected by the Project included notification to appropriate local Native American Tribes, and a sacred lands search through the Native American Heritage Commission (NAHC). Projects considered in Table 11 would, at minimum, also be required to comply with CEQA. Projects that require a CEQA Initial Study or EIR would also undergo consultation with tribal governments through AB 52. As such, projects considered in Table 11 would also complete cultural resources and

cultural tribal resources investigations or similar studies, as well as require similar mitigation measures, to ensure cultural and tribal cultural impacts would not result from the site-specific footprint of any one project. With implementation of Mitigation Measures CR-1 (Protect Contributing Elements of Eligible Historic Resources); CR-2 (Archaeological Monitoring and Inadvertent Discovery During Ground Disturbance); and CR-3 (Protect Human Remains if Encountered During Construction), the Project's contribution to this cumulative impact will not be cumulatively considerable, and therefore less than significant.

Geology and Soils

The nature of most geologic impacts is site-specific, with the exception of erosion of sediment. As discussed in Section 3.7, Geology and Soils, erosion and sedimentation would be managed with implementation of Environmental Protection Action 1 (SWPPP) to avoid a significant adverse impact to the environment. Therefore, most geologic hazards do not accumulate. By implementing California Building Code Standards, which account for earthquake resiliency, the Project would be designed and constructed in compliance with the site-specific recommendations made in the Project's geotechnical reports. With compliance with the recommendations of the Project-specific geotechnical report and applicable state and local regulation and policies, the Project's geologic-related impacts (limited to the Project Site) would be less than significant. Because of the localized nature of geologic and soil impacts, no significant cumulative impacts would result.

Hazards and Hazardous Materials

If Project impacts were to overlap with those from the projects listed in Table 11, the cumulative effect of the Project plus cumulative projects could be significant. As discussed in Sections 3.7, 3.9, and 3.10 above, the Project would adhere to Mitigation Measures HAZ-1 (Implement Corridor Study Recommendations) HAZ-2 (Reduce Wildland Fire Hazards during Construction), and BIO-7 (Protection of Water Quality and Wetlands), which include construction BMPs and implementation of recommendations from the Corridor Study. Existing soil and groundwater contamination on the Project Site is site-specific and would not combine with another project to result in a cumulative impact. With implementation of required mitigation measures, the Project's contribution to this cumulative impact would not be cumulatively considerable and therefore less than significant.

Hydrology and Water Quality

As discussed in Section 3.11, Hydrology and Water Quality, the Project would implement Environmental Protection Action 1 (SWPPP) in compliance with State Water Board Order No. 2009-0009 would be required which will regulate stormwater runoff from Project construction activities Implementation of Environmental Protection Action 1, combined with Mitigation Measure BIO-7 (Protection of Water Quality and Wetlands), would reduce potential water quality impacts during Project construction activities to a less-than-significant level by requiring measures to control erosion and sedimentation of receiving water bodies.

Of the projects considered in Table 11, compliance with State Water Board Order No. 2009-0009 standard BMPs would be required of all projects to ensure potential water quality in nearby creeks are not impacted as a result of indirect construction impacts related to sediment or accidental release of hazardous materials. Operationally, any new runoff resulting from the trail would quickly infiltrate, avoiding a risk of substantial erosion resulting from stormwater events. The trail design would avoid steep slopes or other design features that could contribute to slope instability, future erosion, and risk of siltation. Thus, discharge of stormwater, including pollutants, to nearby creeks and waters would not occur. The potential cumulative impact to water quality resulting from both construction and operation would thus be less than significant.

Noise

As discussed in Section 3.13, Noise, the Project would generate construction noise. However, short-term use of construction equipment is consistent with the existing noise setting and partially-active railroad and related uses. Operational noise would be limited to primarily human speech, sporadic dog bars, and the use of non-motorized modes of transportation, and is not considered impactful. Therefore, the Project would not result in a cumulatively

considerable operational noise impact. The closest noise generating project listed in Table 11 involve is the Caltrans Bypass Project, which has already been constructed and would not contribute to cumulative construction-generated noise. Other projects listed in Table 11 are located sufficiently afar from the Project site, and with intervening vegetation and buildings, as to be noise independent. Therefore, the Project's contribution to cumulative construction noise impacts will not be cumulatively considerable and will be less than significant.

Population and Housing

As described in the Section 3.14, Population and Housing, the Project would not displace existing housing or residents and, therefore, would not contribute to a cumulative impact. The project would not include new homes or businesses; similarly, the projects listed in Table 11 do not include new homes or businesses. The construction workforce required to construct the cumulative projects would be met through the local labor force and would not result in a cumulative impact.

Public Services

As described in the Section 3.15, Public Services, the Project would not necessitate any related new or altered public service facilities. The Project would solely be used for recreational purposes as a non-motorized transportation facility. Other projects listed in Table 11 are similarly transportation facilities that would not necessitate any related new or altered public service facilities, such as new or expanded schools, police facilities, of fire protection facilities. Cumulative impacts to public services would be less than significant.

Recreation

As described in the Section 3.16, Recreation, the Project would create a recreational facility. All potentially significant adverse impacts that would result from the construction and operation of the Project (a trail) are described in the various sections contained within Section 3 (Environmental Impact Analysis) and would be mitigated to a less-than-significant level. Similarly, the potential cumulative impacts are of the trail are evaluated within this section, and are found to result in a less than significant cumulative impact.

Transportation

As described in the Section 3.17, Transportation, Project operation and maintenance would generate minimal traffic trips and would be performed by City staff. Once complete, the proposed Project is not expected to increase vehicle traffic on local streets, as it would not increase the area's population or redirect on-road traffic patterns. The Project would support increased non-motorized travel to and from the area by trail users. The project's qualitative VMT analysis indicates the Project would not conflict or be inconsistent with the State's VMT impact criteria. Of the projects considered for cumulative impacts, none propose alterations to the road segments and intersections utilized by the Project. Additionally, none of the projects are likely to generate operational automobile or truck traffic that would exceed the existing capacity of the road network because they do not result in changes of land use. Any construction related traffic generated by nearby projects occurring at the time of Project construction is unlikely to affect the Project because of the limited footprint and scope of construction activity. Therefore, a cumulative transportation impact would not result.

Utilities and Service Systems

As summarized in Section 3.19, Utilities and Service Systems, the Project would not result in an impact or a need to extend utilities and service systems, including water, wastewater, or telecommunications. Stormwater upgrades on the Project Site would not retain stormwater on-site and would not result in an impact or service demand increase to any other public (or private) stormwater infrastructure in the Project area.

The Project would require electrical connection to power proposed trail lights. The other projects considered in Table 11 would also require some level of electrical utilities for street lighting or safety lighting. The electrical use from all the projects would not require an expansion of electricity utilities or energy generating facilities. Any potential cumulative impact would be less than significant.

Wildfire

As summarized in Section 3.20, Wildfire, the Project would not result in an impact to emergency response or emergency evacuation plans. Therefore, the Project would not contribute to a cumulative impact to emergency response or evacuation plans. If Project impacts were to physically overlap with those from the projects listed in Table 11, the cumulative effect of the Project plus cumulative projects could be significant. However, the cumulative projects would not propose alterations to the road segments and intersections utilized by the Project and, therefore, would not contribute to a cumulative impact associated with infrastructure that may exacerbate fire risk. As discussed in Section 3.11 above, the Project would adhere to HAZ-2 (Reduce Wildland Fire Hazards during Construction), which include construction BMPs to reduce potential risk of fires during Project construction. With implementation of required mitigation measures, the Project's contribution to this cumulative impact would not be cumulatively considerable and therefore less than significant.

c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly? (Less than Significant)

The Project has been planned and designed to avoid significant environmental impacts. As discussed in the analysis throughout Section 3 of this IS/MND, the Project would not have environmental effects that would cause substantial adverse direct or indirect effects on human beings. The impact would be less than significant.

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