



Manila Community Services District Flood Reduction and Drainage Enhancement Project

Public Circulation Initial Study & Proposed Mitigated Negative Declaration

Manila Community Services District

February 17, 2023

→ The Power of Commitment



Public Circulation Initial Study & Proposed Mitigated Negative Declaration

Manila Community Services District Flood Reduction and Drainage Enhancement Project

Prepared for:



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1. Project Information

Project Title	Manila Community Services District Flood Reduction and Drainage Enhancement Project
Lead Agency Name & Address	Manila Community Services District 1901 Park Street Manila, CA 95521
Contact Person & Phone Number	Christopher Drop (707) 444-3803 manilacsd1@sbcglobal.net
Project Location	Manila, CA
General Plan Land Use Designation	Residential Low Density (RL) Public Recreation (PR) Public Facility (PF)
Zoning	Residential Single Family / Manufactured Home/ Archaeological Resource Area (RS-5-M/A) Public Facility – Urban/ Beach and Dune Areas (PF1/B) Public Recreation / Archaeological Resource Area (PR/A)

1.1 CEQA Requirements

This Project is subject to the requirements of the California Environmental Quality Act (CEQA). The lead agency is the Manila Community Services District (CSD). The purpose of this Initial Study is to analyze potential environmental impacts and 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). CEQA encourages lead agencies and applicants to modify their projects to avoid significant adverse impacts.

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 Background, Need, and Purpose

Manila is an unincorporated coastal community encompassing approximately 1,600 acres on the Samoa Peninsula along State Route 255 (SR-255) within Humboldt County, California (Appendix A – Figure 1). The Manila Community Services District (CSD) service area is located on the approximately half-mile wide peninsula along the north spit between Humboldt Bay and the dunes. Manila is approximately 3.5 miles directly north of Eureka and approximately five miles southwest of Arcata.

The existing drainage network lacks connectivity and sufficient capacity with single purpose fixes scattered throughout the community, without consideration of each system's reliance on the functioning of other systems owned by Manila CSD, the County of Humboldt, the Great Redwood Trail Agency (formerly North Coast Rail Authority), Caltrans, and private properties. Winter rains and shallow ground water overwhelm the existing drainage system, resulting in widespread flooding of roadways, residences, and public spaces within this severely disadvantaged community. Manila has been afflicted with chronic flooding every winter for decades. In many locations surrounding local roads and homes, there is no planned drainage whatsoever, contributing to flooding of roadways, driveways, and residences. Culverts are undersized and failing, drainage ditches lack appropriate conveyance capacity and are obstructed by debris and sediment accumulation. Many drainage paths span multiple jurisdictions, each relying on the capacity and condition of the next downstream reach.

Impacts include persistent roadway and driveway flooding from average rainfall events due to undersized and failing culverts, undersized and debris-clogged roadway ditches, and lack of connectivity between facilities. In many locations, roadside drainage facilities are entirely absent, resulting in reduced or closed travel lanes and roadway shoulders and ponding that inhibits access to residences. Roadway flooding and access limitations related to flooding impact mobility through and within Manila and create hazardous conditions for pedestrians and automobiles. Access to public infrastructure such as water meters is inhibited throughout the winter months. Flooding in some areas results in inflow to the Septic Tank Effluent Pump system posing potential risks to septic tank overflows and increasing the cost of pumping and maintaining the wastewater system. Flooding in Manila has become more severe over time as connectivity between the limited existing facilities has diminished and debris-clogged roadside ditches and failing culverts constrain hydraulic capacity

The purpose of the Project is to reduce chronic flooding and enhance drainage throughout the community of Manila, including increases to sea level rise resiliency. The 1987 Storm Drainage Master Plan by Oscar Larson & Associates (OLA 1987) identified several recommended projects and background information, that remain relevant. These projects and background information, in addition to 2018 field investigations by Manila CSD, GHD, and Cal Poly Humboldt's (formerly Humboldt State University) Capstone Engineering Class provide the basis for this community-wide approach to address persistent flooding and drainage problems caused by undersized, disconnected, and failing infrastructure. Simple solutions, consisting of vegetated bioswales, rain gardens, replacement of undersized and failing culverts, and new culverts and storm drain pipes in select locations are proposed. The Project incorporates multi-objective, multi-benefit project components that address flood reduction, ecosystem services, and resiliency to sea level rise and climate change.

1.3 Project Goals

Project goals include:

- Goal 1: Reduce flooding
- Goal 2: Climate change resiliency
- Goal 3: Enhance ecosystem services

1.4 Project Location

The Project is located in Humboldt County within the unincorporated coastal community of Manila on the Samoa Peninsula along State Route 255 (SR-255) (Appendix A – Figure 1 and Figure 2). The Manila Community Services District (CSD) service area is located on the approximately half-mile wide peninsula along the north spit between Humboldt Bay and the dunes. Manila is approximately 3.5 miles directly north of Eureka and approximately five miles southwest of Arcata. A railroad corridor owned by the Great Redwood Trail Agency (GRTA) (formerly North Coast Rail Authority or NCRA) runs parallel to SR-255 along the Samoa Peninsula.

The Project is located entirely within the Coastal Zone. Project elements span the community in five or eight distinct drainage management areas (Figure 3-1 through Figure 3-3 – Project Components):

- Drainage Management Area I – Young Lane Area

- Drainage Management Area II – Darin Road Area (no project components proposed)
- Drainage Management Area III – Ward/Mill Road Area (no project components proposed)
- Drainage Management Area IV – Lupine Drive/Park Street Area
- Drainage Management Area V – Manila Park Area (no project components proposed)
- Drainage Management Area VI – North Victor Boulevard Area
- Drainage Management Area VII – Peninsula/Victor/Raineri/Dean Area
- Drainage Management Area VIII – Peninsula Drive Area

Project elements span local, appeal, and state jurisdictions. Project elements within the local and appeal jurisdictions are regulated by the Humboldt Bay Area Local Coastal Plan and the California Coastal Commission.

The current land use within the Project Area is largely low-density residential and natural resources. The designated land-use within the Project Area includes the following: residential single family, rural residential agriculture, public facility, public recreation, railroad yards, unimproved zones, general commercial, general industrial, and natural resources including dune and wetland areas.

1.5 Project Elements

Project elements are located within the community of Manila (Appendix A – Figure 3-1 through Figure 3-3 – Project Components). Project components include:

- Bioswales: Debris blockages, sediment aggradation, and woody vegetation within existing bioswale flow paths would be removed along with minor grading to restore historical geometry. New bioswales would be graded to connect existing drainage paths. Banks of existing and new bioswales would be seeded with native species.
- Culvert replacement: existing culverts that are undersized and or failing would be replaced with new, larger capacity culverts. Where existing culverts have flap gates, flap gates would be replaced along with the culvert.
- New culverts and storm drain pipes: new culverts and storm drain pipes would be installed in select locations to connect drainage areas.
- Rain gardens: rain gardens would replace select impervious areas at the Manila Community Center and would be constructed as space allows along the roadway where conveyance to other areas is limited.
- Valley gutters: valley gutters would be installed in select locations to connect bioswales at residential driveway crossings.

Bioswales

Bioswales use open channels, as opposed to closed conduits, to carry storm water runoff. Open channel construction costs tend to be considerably lower than closed conduit construction costs. Open channels also maintain a lower average water velocity than closed conduits; this increases the time of concentration therefore also decreases the required design flow downstream and allows for infiltration along the length of the bioswale. Seeding the banks would help reduce erosion and required maintenance. Additionally, open channels allow overland flow to enter from most locations along their reach.

Debris blockages, sediment aggradation, and woody vegetation within existing bioswale flow paths would be removed along with minor grading to restore historical or stable geometry. Banks of existing and new bioswales would be seeded with native species. The drainage channels would be graded to a bottom width and side slope to convey a minimum 10-year storm and available site constraints.

Culverts, Storm Drain Pipes, & Drain Inlets

Dependent on-site constraints, it may not be feasible to use open channels, such as at driveway and roadway crossings. Culverts and storm drain pipes would use either reinforced concrete pipe (RCP) or high-density

polyethylene pipe (HDPE). Both RCP and HDPE pipes would be utilized depending on the amount of cover, estimated loading, and location. When viable, HDPE would be the preferred design choice, otherwise RCP would be utilized.

Where existing culverts have flap gates, flap gates would be replaced along with the culvert. Existing flap gates prevent higher tides from propagating into the existing storm conveyance system. Culvert headwalls would be constructed to stabilize inflow and outflow locations, reduce maintenance needs, and improve visibility. All construction related to culverts and flap gates would occur during low tide. In-water work would not occur. Dewatering prior to construction would not be necessary due to the absence of surface water during construction. Dewatering of ground water would be required in select, deeper excavations. Drain inlets would be installed in select locations to convey surface drainage to storm drain pipes.

Rain Gardens

Rain gardens are landscaped depressions that function to treat on-site stormwater discharge from impermeable surfaces such as roofs, sidewalks, roadways, and parking lots. Rain gardens are beneficial in reducing overall runoff, filtering out pollutants from stormwater runoff, and providing aesthetic value. They can be filled with native plants that also provide wildlife habitat and can increase the likelihood of plant survival. Placement of a rain garden at the Manila Community Center and along Peninsula Drive in select locations would reduce overall flooding, increase infiltration, and make the areas a safer and more functional environment.

Valley Gutters

Valley gutters are a lower-cost alternative to installing new culverts in project locations that intersect residential driveways. Valley gutters would be designed so they are easily cleaned by adjacent property owners and do not impair vehicle access. The installed valley gutters would be fitted with a concrete driveway apron to limit debris blockages and protect aesthetic value. The valley gutters utilized in this project would follow the standards set by the Caltrans Highway Design Manual and/or County standards.

1.6 Drainage Management Areas

Drainage Management Area I – Young Lane Area

Drainage Management Area I (DMA I) includes the area surrounding Young Lane, portions of Hwy 255, and the northern extent of Peninsula Drive. Runoff from within DMA I is generally conveyed adjacent to the roadways from west of Hwy 255, along Young Lane and crosses under Hwy 255 and the railroad right of way before discharging to Humboldt Bay. Proposed improvements in Drainage Management Area I (DMA I) include upsizing existing culverts, a new valley gutter and debris removal and minor grading of bioswales. Project components are listed below in Table 1.6-1 and shown in Figure 3-1.

Table 1.6-1 Project Components in Drainage Management Area I

DMA ID	Improvement(s)
I-01	– N/A – as needed maintenance
I-02	– N/A – as needed maintenance
I-03	– Debris and aggraded sediment removal from existing bioswale along Young Ln.
I-04	<ul style="list-style-type: none"> – Debris and aggraded sediment removal from existing bioswale along Young Ln. – Minor grading of new bioswales along Peninsula Dr. – Replace existing 18-inch diameter culvert and headwalls at Young Ln. with 24-inch diameter culvert – Install (1) valley gutter and driveway apron at existing driveway crossing on Peninsula Dr.
I-05	<ul style="list-style-type: none"> – Debris and aggraded sediment removal from existing bioswale. – Replace existing 18-inch diameter culvert and headwalls at driveway crossing with 30-inch diameter culvert

DMA ID	Improvement(s)
	<ul style="list-style-type: none"> – Replace existing 18-inch diameter culvert and flap gate at railroad crossing with 30-inch diameter culvert with flap gate – Debris removal with existing channel from railroad to salt marsh

Drainage Management Area II – Darin Road Area

Drainage Management Area II (DMA II) includes the area surrounding Stamps Lane, portions of Hwy 255, and Peninsula Drive, from Smigle Road to Phillips Court. Runoff from within DMA II is generally conveyed from west to east, and discharges to Humboldt Bay through multiple railroad right-of-way culvert crossings. This Project does not include construction or operational activities in DMA II.

Drainage Management Area III – Ward/Mill Road Area

Drainage Management Area III (DMA III) includes the area surrounding Ward Street. Runoff from within DMA III is generally conveyed from west to east, originating along the railroad right-of-way is conveyed as surface flow to Humboldt Bay without any defined stormwater conveyance system. This Project does not include construction or operational activities in DMA III.

Drainage Management Area IV – Lupine Drive/Park Street Area

Drainage Management Area IV (DMA IV) includes the area west of Hwy 255, in the vicinity of Lupin Avenue and east of Hwy 255 from Peninsula Drive to Humboldt Bay, north of the Manila Community Park. Runoff from within DMA IV is generally conveyed from west to east, originating in the Lupin Avenue area to the conveyance system along and under Hwy 255 and crosses Peninsula Drive, the railroad right-of-way, and Mill Street, then along the northern boundary of Manila Community Park to Humboldt Bay. Projects within DMA IV include replacement of culverts, removal of a culvert, debris and aggraded sediment removal from existing bioswales, and grading of a new bioswale. Project components are listed below in Table 1.6-2 and shown in Figure 3-2.

Table 1.6-2 Project Components in Drainage Management Area IV

DMA ID	Improvement(s)
IV-01	– N/A – as needed maintenance
IV-02	<ul style="list-style-type: none"> – Installation of (3) valley gutters with new driveway aprons at residential driveways – Debris, vegetation and aggraded sediment removal from existing bioswale
IV-03	– N/A – as needed maintenance
IV-04	<ul style="list-style-type: none"> – Replace existing 18-inch diameter culvert and headwalls with 30-inch diameter culvert and headwalls at Peninsula Drive – Provide maintenance to existing bioretention swales through vegetated area between residences
IV-05	<ul style="list-style-type: none"> – Remove 30-inch culvert in vegetated area near residential properties and grade new bioswale (IV-06). Or replace existing 30-inch culvert with new 30-inch culvert and maintain existing swale. – Debris, vegetation, and aggraded sediment removal from existing bioswale
IV-06	<ul style="list-style-type: none"> – Excavation of new bioswale between existing bioswales – Debris, vegetation, and aggraded sediment removal from existing bioswale
IV-07	<ul style="list-style-type: none"> – Debris, vegetation, and aggraded sediment removal from existing bioswale – Replace existing 18-inch diameter culverts at Mill Street and crossing near Peerless Avenue with 36-inch diameter culverts
IV-08	– N/A – as needed maintenance

Drainage Management Area V – Manila Park Area

Drainage Management Area V (DMA V) encompasses the Manila Community Park and a portion of Manila Avenue. Runoff generally flows east to west without any defined stormwater conveyance features. This Project does not include construction or operational activities in DMA V.

Drainage Management Area VI – North Victor Boulevard Area

Drainage Management Area VI (DMA VI) encompasses the northern area of Victor Boulevard between Manila Avenue and Berry Lane and the railroad right-of-way to Humboldt Bay. Runoff generally flows from west to east through a culvert crossing on Victor Boulevard to Humboldt Bay. Project components within DMA VI include a culvert replacement, new culvert, and debris removal and minor grading of bioswales. A summary of the proposed improvements for Drainage VI are listed below in Table 1.6-3 and shown in Figure 3-2.

Table 1.6-3 *Project Components in Drainage Management Area VI*

DMA ID	Improvement(s)
VI-01	<ul style="list-style-type: none"> – Excavation of a new bioswale between residential properties. – New 18-inch diameter culvert to convey a portion of the drainage through the existing rail prism.
VI-02	<ul style="list-style-type: none"> – Replace existing 18-inch diameter culvert crossing at Victor Boulevard with 24-inch diameter culvert. – In-Line Water Quality Unit to capture fine sediment

Drainage Management Area VII – Peninsula/Victor/Raineri/Dean Area

Drainage Management Area VII (DMA VII) encompasses the area between Peninsula Drive and Hwy 255, south of Mill Street, the southern area of Victor Boulevard and the area west of Hwy 255 in the vicinity of Pacific Avenue. Runoff generally flows from north to south discharging to Humboldt Bay adjacent to the railroad right-of-way south of Manila. Projects components within DMA VII include replacement of existing culverts, addition of a storm drain pipe, and debris and vegetation removal and minor grading of existing bioswales. A summary of the project components for DMA VII are detailed below in Table 1.6-4 and shown in Figure 3-2 and Figure 3-3.

Table 1.6-4 *Project Components in Drainage Management Area VII*

DMA ID	Improvement(s)
VII-01	<ul style="list-style-type: none"> – New 18-inch diameter storm drain pipe in Peninsula Drive – Excavation of bioswales along the Peninsula Drive
VII-02	– N/A – as needed maintenance
VII-03	– Replace existing 12-inch diameter culvert crossing at Peninsula Drive with 18-inch diameter culvert.
VII-04	<ul style="list-style-type: none"> – Replace existing 18-inch culvert with 24-inch culvert from railroad bioswale to Hwy 255 bioswale – Replace existing 18-inch diameter culvert at railroad crossing with 24-inch diameter culvert – Debris, vegetation, and aggraded sediment removal from existing bioswale
VII-05	– N/A – as needed maintenance
VII-06	– Replace existing 24-inch diameter culvert and flap gate at railroad crossing with 36-inch diameter culvert with flap gate
VII-07	<ul style="list-style-type: none"> – Installation of valley gutter or culvert at driveway crossing – New 18-inch diameter culvert crossing at Peninsula Drive – New bioswale along western edge of Peninsula Drive – Remove aggraded sediment from historical bioswale along eastern edge of Peninsula Drive
VII-08	– Remove aggraded sediment from historical bioswale along eastern edge of Peninsula Drive

DMA ID	Improvement(s)
VII-09	<ul style="list-style-type: none"> – Replace existing 12-inch diameter culvert on Lupin Avenue with 18-inch diameter culvert – Debris, vegetation, and aggraded sediment removal from existing bioswale
VII-10	<ul style="list-style-type: none"> – Debris, vegetation, and aggraded sediment removal from existing bioswale – Replace existing 12-inch diameter culverts (2) at private drive railroad crossings with 18-inch diameter culverts and headwalls – New 18-inch diameter culvert and headwalls at future private drive railroad crossing
VII-11	<ul style="list-style-type: none"> – Replace existing 12-inch diameter culvert at private drive railroad crossings with 18-inch diameter culverts and headwalls – Debris, vegetation, and aggraded sediment removal from existing bioswale – New 18-inch diameter culvert and headwalls at future private drive railroad crossing

Drainage Management Area VIII – Peninsula Drive Area

Drainage Management Area VIII (DMA VIII) is located at the southernmost end of Manila and is bordered by DMA VII to the north, dune, and wetlands to the south and west, and Humboldt Bay to the east. Runoff is generally from west to east, accumulating in localized depressions without formalized storm drain conveyance systems, with the exception of drain inlets and storm drain pipes at the Manila Community Center. Project components within DMA VIII include the replacement of the existing storm drain system at the Community Center with an interactive rain garden and installation of a series of bioswales and rain gardens along the edge of Peninsula Drive. A summary of the proposed drainage improvements for Drainage Area VIII described below in Table 1.6-5 and shown in Figure 3-3.

Table 1.6-5 Project Components in Drainage Management Area VIII

DMA ID	Improvement(s)
VIII-01	<ul style="list-style-type: none"> – Remove existing drain inlets and pipes at Manila Community Center and replace with interactive rain garden – Replace existing 6-inch diameter storm drain pipe with 12-inch diameter storm drain pipe.
VIII-02	<ul style="list-style-type: none"> – Install series of rain gardens, bioswales and valley gutters along Peninsula Drive.

1.7 Project Construction

Construction Schedule

Construction would occur within a single construction season, commencing in the summer of 2024 and concluding by December 2024. If feasible, vegetation clearing outside of the nesting bird season would occur first, between August 15, 2023, and March 15, 2024. Construction would require approximately nine months, likely commencing in May. Construction may extend into 2025 if necessary.

Construction Activities and Equipment

All construction activities would be accompanied by both temporary and permanent erosion and sediment control reduction best management practices (BMPs), including but not limited to silt fencing, fiber rolls, and post-construction seeding and mulch in disturbed areas. Project construction would include the following activities:

- Mobilization of equipment and materials to the site including setting up staging areas
- Clearing, grubbing, and vegetation removal – To clear the bioswales and other work areas
- Grading/Excavation – Throughout the Project Area to remove existing pavement and achieve grade and dimensions to the new bioswales, culverts, and rain gardens
- Trenching – To install replacement and new culverts and storm drain pipes

- Paving - Along public roadways, following culvert replacement and installations where located within the roadway
- Demobilization of equipment and materials from the site including cleaning up and restoring staging areas

Equipment required for construction could include concrete trucks, concrete pump trucks, all terrain forklifts, snooper truck, compressors, tracked excavators, backhoes, graders, dump trucks, skid steers, bobcats, and pick-up trucks. Jackhammers, saws, grinders, or similar pieces of equipment may be necessary to support pavement removal. It is not anticipated that any temporary utility extensions, such as electric power or water, would be required for construction. Water from legal sources would be used for dust control, compaction, and re-vegetation. In-water work, channel dewatering, and fish relocation are excluded from this project.

Construction Access

The Project Area would be accessed via SR-255, Peninsula Drive, and auxiliary streets. No new access roads would need to be constructed in order to implement the Project.

Stockpiling and Staging

Stockpiling and staging would occur within existing uplands and disturbed areas of the Project Area. Areas include roadway shoulders and paved areas or graveled areas at Manila Community Park, Manila Community Center, and the CSD Office (Appendix A Figure 3-2 and Figure 3-3). Within the stockpiling and staging area, BMPs would be utilized to control erosion and prevent sediment and hazardous materials from impacting the environment.

Excess soils, aggregate road base, and construction materials would be stored on site within designated stockpiling and staging areas described above. 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.

Establish Exclusion Areas and Erosion Control

Except for areas that would be unavoidably impacted during construction, identified sensitive resource areas to be protected would be excluded with protective fencing or signage prior to construction. Erosion control would also be installed prior to precipitation (e.g., silt fencing or fiber rolls).

Vegetation Removal

Vegetation removal would include mowing and brush removal. Tree removal may also be required. Vegetation removal would be timed to avoid potential impacts to nesting birds and bats to the greatest extent feasible.

Grading and Fill

Minor grading would need to occur at culvert replacement sites, for the installation of drain inlets and pipes, for rain gardens, and at select bioswales to restore historical or stable geometry. Permeable aggregate and bioretention soil media would be placed at rain garden sites. Structural fill would be placed and compacted at culvert, headwall, storm drain pipe, and drain inlet sites.

Traffic and Access Control

Temporary lane closures on Young Lane, Peninsula Drive, Mill Street, and Victor Boulevard may be required. Temporary lane closures would follow County requirements for temporary roadway closures, including signage, public noticing, and compliance with the California Manual on Uniform Traffic Control Devices (CA MUTCD) requirements.

Groundwater Dewatering

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.

1.8 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. 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, Environmentally Sensitive Habitat Areas (ESHA), or Sensitive Natural Communities.

1.9 Maintenance and Operation

Following construction, drainage system infrastructure would be maintained and operated by the Manila CSD. The Project has been designed to minimize long-term operational and repair costs.

Bioswale maintenance would include regular clearing of debris from culvert inlets, occasional removal of sediment, and annual maintenance of vegetation. The Manila CSD would follow County, GRTA/NCRA and Caltrans processes for maintenance requests as well as develop a method for completing maintenance if these entities are unable to complete maintenance in a timely manner.

Maintenance of RCP and HDPE pipes would include occasional cleanout of sediment and other debris. Manila CSD would follow County, GRTA/NCRA and Caltrans processes for maintenance requests as well as develop a method for completing maintenance if these entities are unable to complete maintenance in a timely manner.

1.10 Regulatory Permits, CEQA, and NEPA

Manila Community Services District is the CEQA lead agency for the Project. An Initial Study/Proposed Mitigated Negative Declaration is the proposed CEQA pathway.

The Project Area is within the County and State Jurisdiction of the Coastal Zone. A consolidated coastal development permit would be required from the California Coastal Commission.

A wetland delineation has been completed for the Project (Appendix C). The Project would impact three-parameter wetlands; therefore, permits from the U.S. Army Corps of Engineering (USACE) under Section 404 of the Clean Water Act (CWA), and a corresponding Water Quality Certification from the North Coast Regional Water Quality Control Board (Region Board) under Section 401 of the CWA would be required. Impact analysis specific to one- and three-parameter wetlands can be found in the CEQA IS/MND and Wetland Delineation (Appendix C) prepared for the Project.

The Project does not involve any waterways or impacts to riparian habitat; thus, a Lake and Streambed Alteration Agreement from the California Department of Fish and Wildlife would not be required. Similarly, the Project is not expected to require consultation with the U.S. Fish and Wildlife Service or the National Marine Fisheries Service/NOAA Fisheries, as potential impacts to federal special status plants, fish, or wildlife species are not anticipated.

2. Environmental Protection Actions Incorporated into the Project

The following actions are included as part of the Project to reduce or avoid potential adverse effects that could result from construction or operation of the Project. Mitigation measures are presented in the following analysis in Section 4

– Environmental Analysis. Environmental protection actions and mitigation measures, together, would be included in a Mitigation Monitoring and Reporting Program at the time that the Project is considered for approval.

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

The Project will obtain coverage under State Water Resources Control Board (Water Board) Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities. The Project will submit permit registration documents (notice of intent, risk assessment, site maps, 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.

2.2 Mitigation, Monitoring, and Reporting Program

The Mitigation, Monitoring, and Reporting Program (MMRP) for this Initial Study/Mitigated Negative Declaration (ISMND) is included in Appendix F. The MMRP includes a summary of all environmental protection actions and mitigation measures, and how each action and mitigation measure would be implemented to ensure all potential impacts associated with the Project would result in a less than significant environmental impact.

2.3 Tribal Consultation

The Manila CSD sent out requests for consultation of proposed Projects from California Native American tribes pursuant to Public Resources Code Section 21080.3.1. Under Assembly Bill (AB) 52, notification letters were sent to the Wiyot Tribe, Blue Lake Rancheria, and the Bear River Band of the Rohnerville Rancheria on November 2, 2022. Consultation occurred with the Bear River Band of the Rohnerville Rancheria on December 12, 2022 and was concluded on December 30, 2022. The tribes' requests have been incorporated into Section 4.17. The Wiyot Tribe and the Blue Lake Rancheria did not respond within 30 days.

3. 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:

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agricultural & Forestry Resources | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities/Service Systems |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input checked="" type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> 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.



Christopher Drop, General Manager

02/17/2023
Date

4. Environmental Analysis

4.1 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 bioswales, roadside vegetation, State Route 255, the Manila Community Center, and adjacent residences and are not considered to have exceptional scenic quality. Views of dunes, dune vegetation (e.g., willows), and Humboldt Bay are visible from some locations in Manila.

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

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 Humboldt County General Plan identifies scenic vistas from US 101, beaches, state parks, and coastal access points. There are no scenic vistas in the Project Area. Additionally, views of dunes and Humboldt Bay, visible from some locations in Manila, would not be altered. 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, near, or within view of a state scenic highway (Caltrans 2019). 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? (No Impact)

Proposed actions would not conflict with zoning and other regulations governing scenic quality within Humboldt County. The proposed Project would maintain the visual character of the area by clearing debris blockages, sediment aggradation, and woody vegetation within existing bioswale flow paths with minor grading to restore historical or stable geometry. It would also create new bioswales, and the banks of existing and new bioswales would be seeded and planted with native species. The Project does not include any tall visual elements that would block or screen public views. No impact would result.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (No Impact)

The Project does not include any new streetlights or other lighting elements. Night-time construction would not occur. No proposed Project elements would cause substantial new sources of glare. No impact would result.

4.2 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 along the Samoa peninsula within the community of Manila. There are no agricultural or forestry land uses within the Project Area.

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

The Department of Conservation (DOC)'s Farmland Mapping and Monitoring Program has not been completed for Humboldt County. Therefore, lands within the Project Area have not been formally analyzed by the DOC to determine if they meet the criteria for being designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

For this analysis, "Agricultural Soils" and "Prime Agricultural Soils" designations via the Humboldt County WebGIS online mapping tool were utilized, which utilizes soils data from the Natural Resources Conservation Service (NRCS). According to the Humboldt County WebGIS, the Project Area does not include Agricultural Soils or Prime Agricultural Soils (Humboldt County 2023a). The Project would not remove agricultural land from production or result in a change in land use, as there is no such land presently under agricultural use within the Project Area. No impact would result.

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

There are no agricultural zoning or active Williamson Act contracts within the Project Area. Zoning within the Project Area is discussed in Section 4.10 (Land Use and Planning). 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 4.10 (Land Use and Planning). No impact would result.

e) Convert Farmland or Forest? (Less than Significant Impact)

The Project may include the removal of some small coastal trees; however, the trees that would be removed are coastal species (e.g., willow) and not considered a forest resource. Potential biological impacts associated with tree removal are discussed in Section 4.4 (Biological Resources). 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. A less than significant impact would result.

4.3 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 Humboldt County portion of the North Coast Air Basin (Air Basin) which is managed by the North Coast Unified Air Quality Management District (NCUAQMD). The NCUAQMD monitors air quality, enforces local, State, and federal air quality regulations for counties within its jurisdiction, inventories and assesses the health risks of Toxic Air Contaminants (TACs), and adopts rules that limit pollution.

For construction emissions, the NCUAQMD has indicated that emissions are not considered regionally significant for projects whose construction would be relatively short in duration, lasting less than one year. For Project construction lasting more than one year or involving above average construction intensity in volume of equipment or area disturbed, construction emissions may be compared to the stationary source thresholds (NCUAQMD 2019). Construction would occur in one season and would occur in 2024. Emissions related to construction were calculated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0 and are discussed below (also see Appendix B – CalEEMod Modeling Information and Results).

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 NCUAQMD is responsible for monitoring and enforcing local, State, and federal air quality standards. Humboldt County is designated ‘attainment’ for all National Ambient Air Quality Standards. With regard to the California Ambient Air Quality Standards, Humboldt County is designated attainment for all pollutants except PM₁₀. Humboldt County is designated as “non-attainment” for the State’s PM₁₀ standard.

PM₁₀ refers to inhalable particulate matter with an aerodynamic diameter of less than 10 microns. PM₁₀ 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. PM₁₀ 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. Therefore, any use or activity that generates airborne particulate matter may be of concern to the NCUAQMD. The proposed Project would create PM₁₀ emissions in part through vehicles coming and going to the Project Area and the construction activity associated with the Project.

To address non-attainment for PM₁₀, the NCUAQMD adopted a Particulate Matter Attainment Plan in 1995. This plan presents available information about the nature and causes of PM₁₀ standard exceedances and identifies cost-effective control measures to reduce PM₁₀ emissions to levels necessary to meet California Ambient Air Quality Standards. However, the NCUAQMD states that the plan, “should be used cautiously as it is not a document that is

required in order for the District to come into attainment for the state standard” (NCUAQMD 2021). Therefore, compliance with applicable NCUAQMD PM₁₀ rules is applied as the threshold of significance for the purposes of analysis. NCUAQMD Rule 104 Section D, Fugitive Dust Emissions, is applicable to the Project.

Rule 104, Section D – Fugitive Dust Emissions is used by the NCUAQMD to address non-attainment for PM₁₀. Pursuant to Rule 104 Section D, the handling, transporting, or open storage of materials in such a manner, which allows or may allow unnecessary amounts of particulate matter to become airborne, shall not be permitted. Reasonable precautions shall be taken to prevent particulate matter from becoming airborne, including, but not limited to covering open bodied trucks when used for transporting materials likely to give rise to airborne dust and the use of water during the grading of roads or the clearing of land. During earth moving activities, fugitive dust (PM₁₀) would be generated. The amount of dust generated at any given time would be highly variable and is dependent on the size of the area disturbed at any given time, amount of activity, soil conditions, and meteorological conditions. Unless controlled, fugitive dust emissions during construction of the shared use pathway could be a potentially significant impact, therefore, Mitigation Measure AQ-1 would be incorporated to comply with NCUAQMD’s Rule 104 Section D.

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 NCUAQMD’s Rule 104 Section D. No impact from operation of the Project would result.

Mitigation

Implementation of Mitigation Measures AQ-1 would reduce the potential impact related to PM₁₀ fugitive dust by requiring BMP measures.

Mitigation Measure AQ-1: Measures to Reduce Air Pollution

The contractor shall implement the following measures during construction:

- All exposed surfaces (e.g., staging areas, soil piles, active graded areas, excavations, and unpaved access roads) shall be watered two times per day or as required by site conditions and current weather patterns.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using street sweepers at least once per day, or as needed to alleviate dust and debris on the roadway.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour, unless the unpaved road surface has been treated for dust suppression with water, rock, wood chip mulch, or other dust prevention measures.
- All areas to be paved shall be completed as soon as possible.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes.
- All construction equipment shall be maintained and properly tuned in accordance with the manufacturer’s specifications.

With implementation of Mitigation Measure AQ-1, the Project would not conflict with applicable air plans. This impact would be reduced to a less-than-significant level with mitigation.

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 with Mitigation)

The Project’s potential to generate a significant amount of criteria pollutants of concern during Project construction and operation is assessed in this Section. As noted above, Humboldt County is designated nonattainment of the State’s PM₁₀ standard. The County is designated attainment for all other state and federal standards. Potential impacts of

concern will be exceedances of State or federal standards for PM₁₀. Localized PM₁₀ is of concern during construction because of the potential to emit fugitive dust during earth-disturbing activities.

Construction

Localized PM₁₀

The Project would include clearing and grubbing, grading, and paving activity. Generally, the most substantial air pollutant emissions would be dust generated from site clearing and grubbing, and grading. If uncontrolled, these emissions could lead to both health and nuisance impacts. Construction activities would also temporarily generate emissions of equipment exhaust and other air contaminants. The Project's potential impacts from equipment exhaust are assessed separately below.

The NCUAQMD does not have formally adopted thresholds of significance for fugitive, dust-related particulate matter emissions above and beyond Rule 104, Section D which does not provide quantitative standards. For the purposes of analysis, this document uses the Bay Area Air Quality Management District (BAAQMD) approach to determining significance for fugitive dust emissions from Project construction. The BAAQMD bases the determination of significance for fugitive dust on a consideration of the control measures to be implemented. If all appropriate emissions control measures recommended by BAAQMD are implemented for a project, then fugitive dust emissions during construction are not considered significant. BAAQMD recommends a specific set of "Basic Construction Measures" to reduce emissions of construction-generated PM₁₀ to less than significant. Without incorporation of these Basic Construction Measures, the Project's construction-generated fugitive PM₁₀ (dust) would result in a potentially significant impact.

The Basic Construction Measure controls recommended by the BAAQMD are incorporated into Mitigation Measure AQ-1. These controls are consistent with NCUAQMD Rule 104 Section D, Fugitive Dust Emission and provide supplemental, additional control of fugitive dust emissions beyond that which would occur with Rule 104 Section D compliance alone. Therefore, with incorporation of Mitigation Measure AQ-1, the Project would result in a less than significant impact for construction-period PM₁₀ generation and would not violate or substantially contribute to an existing or projected air quality violation.

Construction Criteria Pollutants

The NCUAQMD does not have established CEQA significance criteria to determine the significance of impacts that would result from projects such as the proposed Project; however, the NCUAQMD does have criteria pollutant best available control technology (BACT) thresholds for new or modified stationary source projects proposed within the NCUAQMD's jurisdiction. For construction emissions, the NCUAQMD has indicated that emissions are not considered regionally significant for projects whose construction would be of relatively short duration, lasting less than one year. NCUAQMD has indicated that it is appropriate for lead agencies to compare proposed construction emissions that last more than one year to its BACT thresholds for stationary sources identified in Rule 110(E)(1), which are:

- Nitrogen Oxides – 40 tons per year
- Reactive Organic Gases – 40 tons per year
- PM₁₀ – 15 tons per year
- Carbon Monoxide – 100 tons per year.

CalEEMod version 2020.4.0 was used to estimate air pollutant emissions from Project construction (Appendix B). Construction of the Project is expected to begin in 2024 and would be completed within one construction season. Detailed material hauling volumes were provided by the Project's Design Team. The Project's estimated construction emissions are provided in Table 4.3-1 and 7.3-2 for annual and daily emission rates, respectively. As shown in the tables, the Project would not exceed the NCUAQMD's thresholds of significance. Therefore, the Project's construction emissions are considered to have a less than significant impact.

Table 4.3-1 Annual Construction Regional Pollutant Emissions

Parameter	Annual Emissions (tons/year)			
	ROG	NOx	CO	PM10
Project Construction (2024)	<0.1	0.3	0.2	<0.1
NCUAQMD Stationary Source Thresholds	40.0	40.0	100	15.0
Significant Impact?	No	No	No	No

Table 4.3-2 Daily Construction Regional Pollutant Emissions

Parameter	Average Daily Emissions (pounds/day)			
	ROG	NOx	CO	PM10
Project Construction (2024)	0.8	7.3	6.9	2.1
NCUAQMD Stationary Source Thresholds	50.0	50.0	500.0	80.0
Significant Impact?	No	No	No	No

Operation

Following construction, the Project would not include any stationary sources of air emissions. Vehicle trips associated with operation and maintenance of the proposed Project would include maintenance and monitoring as described in the Project Description and would be consistent with the existing maintenance and monitoring of the existing stormwater infrastructure. The Project 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 any criteria pollutant for which the region is in non-attainment. The Project’s contribution to a cumulative impact would be less than significant.

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

Activities occurring near sensitive receptors should receive a higher level of preventative planning. Sensitive receptors include school-aged children (schools, daycare, playgrounds), the elderly (retirement community, nursing homes), the infirm (medical facilities/offices), and those who exercise outdoors regularly (public and private exercise facilities, parks). Sensitive receptors adjacent to the Project Area include residential uses and the Manila Community Center, which serves as a school during the academic year.

Project construction activities would occur over one construction season. Project construction is not expected to include intensive or prolonged construction equipment use for a long duration. Additionally, equipment use would be spread out over a linear project alignment, 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 any stationary sources of air emissions or new mobile source emissions that would result in substantial long-term operational emissions of criteria air pollutants. Therefore, Project operation would not expose nearby sensitive receptors to substantial levels of pollutants. The potential operation-related 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)

Implementation of the Project would not result in major sources of odor. The Project type is not one of the common types of facilities known to produce odors (i.e., landfill, coffee roaster, wastewater treatment facility, etc.). Minor odors from the use of equipment during construction activities would be intermittent and temporary and would dissipate

rapidly from the source with an increase in distance. Thus, the Project would not create objectionable odors affecting a substantial number of people. The impact would be less than significant.

4.4 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

A Wetland Delineation, Botanical and Sensitive Natural Community Assessment Memorandum (Botanical Report), and Wildlife Habitat Assessment Memorandum (Wildlife Assessment) were prepared to assess baseline environmental conditions within the Project Area and are included as Appendix C, D, and E, respectively. These studies evaluate the potential for any special status plants, wildlife species, or any sensitive natural communities (SNCs) or aquatic resources to occur. The BSA, or the area directly or indirectly impacted by the proposed Project, encompasses a 0.25-mile radius around 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)**

Special-status Plant Species

Special status plant species include those listed as endangered, threatened, or as candidate species by the CDFW, under the California Endangered Species Act (CESA), and/or under the federal Endangered Species Act (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.

Three seasonally appropriate floristic surveys for special status plants were conducted in the Project Area for special status plant species and vegetation assessments during the spring and summer of 2022 (May 3 and 4, and July 26).

Based on occurrence records and habitat availability, four special status plants have a high probability of occurring in the BSA. Lyngbye's sedge (*Carex lyngbyei*) has a CRPR of 2B.2, Humboldt Bay owl's-clover (*Castilleja ambigua* var. *humboldtensis*) has a CRPR of 1B.2, Point Reyes salty bird's-beak (*Chloropyron maritimum* ssp. *Palustre*) has a CRPR of 1B.2, western sand-spurrey (*Spergularia canadensis* var. *occidentalis*) has a CRPR of 2B.1. One special status specie, Lyngbye's sedge, was observed in the BSA in an area planned for debris, vegetation, and aggraded sediment removal from the existing bioswale, leading to a potentially significant impact.

Two additional special status species were observed immediately outside the BSA: Humboldt Bay owl's-clover and Point Reyes salty bird's-beak. Twenty-four additional special status species have a low likelihood of occurring within the Project Area (Appendix D). With a special status plant occurring within the BSA, a potentially significant impact could occur.

Mitigation

Implementation of Mitigation Measure BIO-1 would reduce the potential impact to special status plants.

Mitigation Measure BIO-1: Protect Special Status Plants

Avoidance and minimization measures for special status plant species are addressed collectively for all species. The following measures are recommended:

- The locations of any special status plant populations mapped herein shall be clearly identified in the contract documents (100% design plans and final specifications) if they occur within or adjacent to the grading boundary.
- If special status plant populations are detected where construction will have unavoidable impacts, seed will be collected prior to construction by a qualified botanist and redistributed following construction during the appropriate season. On-site seed collection from the impacted species will be prioritized. If on-site seed collection is infeasible due to blooming period conflicts with the planned construction season, off-site seed collection will occur from a suitable nearby area.

Mitigation Measure BIO-1 requires practicable avoidance and protection measures for special status plants during construction, thereby reducing any potential impacts. With the implementation of Mitigation Measure BIO-1, potential impacts to special status plants would be less than significant.

Special Status Mammals

A reconnaissance-level site visit was on May 24, 2022. No special status mammal species were observed in the Project Area during reconnaissance level surveys or technical surveys. The Wildlife Assessment identified two special status mammals that have a moderate potential to occur within or directly adjacent to the BSA. The Townsend's Big-eared Bat (*Corynorhinus townsendii*) and the Long-eared Myotis (*Myotis evotis*) have been detected adjacent to the BSA (Appendix E). The BSA provides suitable roosting and foraging habitat for special status bats. Vegetation removal would include mowing and brush removal. Tree removal may also be required. Therefore, a potentially significant impact could occur.

Mitigation

Implementation of Mitigation Measure BIO-2 would reduce the potential impact to special status mammals.

Mitigation Measure BIO-2: Protect Special Status Bats

Removal of confirmed or presumed-occupied bat roost habitat will occur 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 above 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, the Manila CSD's qualified 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 will be established in consultation with CDFW to ensure that construction noise will 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 BSA, 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.

Mitigation Measure BIO-2 requires practicable avoidance and protection measures for special status bats during construction, thereby reducing any potential impacts. With the implementation of Mitigation Measure BIO-2, potential impacts to special status bats would be less than significant.

Special Status, Migratory, and Nesting Birds

A reconnaissance-level wildlife site visit was conducted on May 24, 2022. One special status bird Great Egret (*Ardea alba*) was observed flying over the study area. The Wildlife Assessment identified ten special status birds, including one state endangered (SE) and one state threatened (ST), that were found to have a moderate or high potential to occur within the BSA, either for foraging or nesting, or both (Appendix E).

- Great Egret (*Ardea alba*) – present
- Great Blue Heron (*Ardea herodias*) – moderate potential (foraging, nesting),
- Northern Harrier (*Circus hudsonius*) – moderate potential (foraging, nesting),
- Snowy Egret (*Egretta thula*) – moderate potential (foraging),
- White-tailed Kite (*Elanus leucurus*) – moderate potential (foraging, nesting),
- Bald Eagle (*Haliaeetus leucocephalus*, SE) – moderate potential (foraging),
- Double-Crested Cormorant (*Nannopterum auritum*) – moderate potential (foraging),
- Black-Crowned Night Heron (*Nycticorax nycticorax*) – moderate potential (foraging),
- Osprey (*Pandion haliaetus*) – moderate potential (foraging),
- Bank Swallow (*Riparia riparia*, ST) – moderate potential (foraging),

If special status and/or native migratory birds are nesting in the BSA, or within 500 feet during construction activities, these special status and protected migratory birds could 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 potentially significant impact.

Mitigation

Implementation of Mitigation Measure BIO-3 would reduce the potential impact to special status and protected migratory and nesting birds.

Mitigation Measure BIO-3: Protect Special Status, Migratory, and Nesting Birds

Ground disturbance and vegetation clearing will be conducted, where feasible, 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. Ground disturbance and vegetation clearing that cannot be confined to the fall and/or winter outside of the nesting season, will require that a qualified biologist conduct pre-construction surveys within the vicinity of the BSA, to check for nesting activity of native birds and to evaluate the site for presence of raptors and special status bird species. The biologist will 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 biologist will conduct a supplemental avian pre-construction survey before Project work is reinitiated.

If active nests are detected within the construction footprint, or within 500 feet of construction activities, the biologist will flag a buffer around each nest. Construction activities will avoid nest sites until the biologist determines that the young have fledged, or nesting activity has ceased. If nests are documented outside of the construction (disturbance) footprint, but within 500 feet of the construction area, buffers will be implemented as needed. In general, the buffer size for common species will be determined on a case-by-case basis in consultation with the CDFW and, if applicable, with USFWS. Buffer sizes will take into account 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 active nests are detected during the survey, the qualified biologist will monitor all nests at least once per week to determine whether birds are being disturbed. Activities that might, in the opinion of the qualified biologist, disturb nesting activities (e.g., excessive noise), will be prohibited within the buffer zone until such a determination is made. If signs of disturbance or distress are observed, the qualified biologist will immediately implement adaptive measures to reduce disturbance. These measures may include, but are not limited to, increasing buffer size, halting disruptive construction activities in the vicinity of the nest until fledging is confirmed or nesting activity has ceased, placement of visual screens or sound dampening structures between the nest and construction activity, reducing speed limits, replacing and updating noisy equipment, queuing trucks to distribute idling noise, locating vehicle access points and loading and shipping facilities away from noise-sensitive receptors, reducing the number of noisy construction activities occurring simultaneously, and/or reorienting and/or relocating construction equipment to minimize noise at noise sensitive receptors.

With the implementation of Mitigation Measure BIO-3, potential impacts to special status and protected migratory birds would be less than significant.

Special-status Amphibian and Reptile Species

No special status amphibian or reptile species were observed in the Project Area during reconnaissance level surveys on May 24, 2022; however, focused herpetological surveys were not conducted in the Project Area. The Wildlife Assessment (Appendix E) notes that suitable habitat for Northern Red-legged Frogs (*Rana aurora*) is present in the Project Area, and that the species has a moderate potential to be present during construction. If present in the Project Area during construction activities, Northern Red-legged Frogs could be injured or killed via crushing, entrapment, or burying (related to ground disturbance), and/or potentially displaced from habitat, resulting in a potentially significant impact.

Mitigation

Implementation of Mitigation Measure BIO-4 would reduce the potential impact to Northern Red-legged Frogs.

Mitigation Measure BIO-4: Protect Northern Red-legged Frogs

The Manila CSD will retain a qualified biologist to perform a pre-construction survey for the Northern Red-legged Frog within seven days prior to commencement of ground disturbance. The survey will be limited to the Project footprint and within 50 feet of suitable habitat. The biologist will relocate any specimens that occur within the work-impact zone to nearby suitable habitat. If a Northern Red-legged Frog is observed in an active construction zone, the contractor will halt construction activities in the area and the frog will be moved to a safe location in similar habitat outside of the construction zone. Construction within areas of standing water will be limited to the period of the year between July 1 and October 30 to avoid disturbance to breeding frogs. After July 1, a qualified biologist will inspect any work areas containing surface water (not including puddles resulting from rainfall) to ensure tadpoles or metamorphosing frogs are not present. If they are present, the qualified biologist will implement a rescue and relocation operation to move any tadpoles or metamorphosing frogs to a safe location in nearby suitable habitat.

Mitigation Measure BIO-4 requires practicable avoidance and protection measures for Northern Red-legged Frogs during construction, thereby reducing any potential impacts. With the implementation of Mitigation Measure BIO-4, potential impacts to the Northern Red-legged Frogs would be less than significant.

Special Status Fish

No special status fish species or aquatic habitat that could support fish species are present within the Project Area. However, small portions of the BSA intersect with the Humboldt Bay, which is federally-designated Essential Fish Habitat for Groundfish, coastal pelagic species, Coho Salmon, and Chinook Salmon. More specifically, the DMA IV portion of the BSA near the Manila Community Park extends approximately 100 feet into the Humboldt Bay (Appendix A – Figure 3-2). However, no work is proposed in Humboldt Bay.

The BSA includes the shoreline margin of Humboldt Bay. All construction related to culverts and flap gates would occur during low tide. In-water work would not occur. Dewatering prior to construction would not be necessary due to the absence of water during construction. As a result, the potential for aquatic species to occur is avoided. The potential to impact special status aquatic species would be limited to indirect water quality impairments, which will be controlled with erosion control protocols during ground disturbance required under Environmental Protection Action 1 (SWPPP). If construction inadvertently encroached into Humboldt Bay, a potentially significant impact could occur to special status fish. There, Mitigation Measure BIO-5 has been incorporated into the Project.

Mitigation

Implementation of Mitigation Measure BIO-5 would reduce the potential impact to Special Status Fish.

Mitigation Measure BIO-5: Protect Special Status Fish

The following shall be implemented by Manila CSD to protect special status fish:

- Temporary exclusion fencing will be installed along the shoreline near planned areas of ground disturbance, if any, to limit inadvertent disturbance near aquatic habitat. The temporary exclusion fencing will be shown in the final 100% construction plan set.
- Equipment maintenance or refueling will not occur within 100 feet of the Humboldt Bay shoreline.
- Erosion control shall be installed for work in tidal drainages to avoid post-construction turbidity inputs into Humboldt Bay. Erosion control measures shall be shown on the final 100% design planset.
- Dewatering of aquatic habitat shall not occur.
- Fish relocation shall not occur.

Mitigation Measure BIO-5 requires practicable avoidance and protection measures for special status fish during construction, thereby reducing any potential impacts. With the implementation of Mitigation Measure BIO-5, potential impacts to special status fish would be less than significant.

Special Status Invertebrates

One special status invertebrate, the Western Bumble Bee (*Bombus occidentalis*), was observed in the Project Area during the reconnaissance level survey. However, only limited patches of nectar plants needed for foraging are present within the BSA. Although the Project Area falls within the species pre-2002 range for the Western Bumble Bee, the range has contracted significantly in the last decade and now only includes the intermountain west and cascade regions of the US, this species is now regionally rare. The species is not federally or state listed. However, the Western Bumble Bee has a State Rank of 1, which indicates it is critically imperiled (Appendix E). Thus, due to ground disturbances from the Project, a potentially significant impact could occur.

Mitigation

Implementation of Mitigation Measure BIO-6 would reduce the potential impact to the special status Western Bumble Bee.

Mitigation Measure BIO-6: Protect Western Bumble Bee

If an occupied Western Bumble Bee nest is observed in an active construction zone, the contractor will halt construction activities surrounding the area. A biologist will observe the nest and a buffer would be established to protect the occupied nest.

Mitigation Measure BIO-6 requires actions to halt construction if a Western Bumble Bee is observed, thereby reducing any potential impacts. With the implementation of Mitigation Measure BIO-6, potential impacts to special status invertebrates would be less than significant.

b, c) Have a substantial adverse effect on any riparian habitat or other sensitive natural community, or state or federally protected wetlands? (Less Than Significant with Mitigation)

While the dominant vegetation within the Project Area is non-native sweet vernal grass (*Anthoxanthum odoratum*) and other invasive plant species, the Project Area contains SNCs, Environmentally Sensitive Habitat Areas (ESHA), and wetlands (Appendix C and D). SNCs are habitats and plant communities so designated by the CDFW and listed in the Sensitive in the CNDDDB and on the California Sensitive Natural Communities List. The SNCs are broken down to alliance and association levels for vegetation types affiliated with ecological sections in California. The CDFW considers alliances and associations with a state rank of S1 to S3 to be Sensitive. The BSA contains several vegetation communities which are considered SNCs and may also be considered ESHA. However, all SNCs and potential ESHA present are also considered one- or three-parameter wetlands in the Coastal Zone and were not further evaluated or mapped. SNCs present are briefly summarized below (Table 4.4-1); however, these areas were also within one- or three-parameter wetlands and were mapped and classified as wetlands.

Table 4.4-1 Sensitive Natural Communities in the Biological Study Area

Habitat Type	Global Rank ¹	State Rank ¹	Characteristic species ¹
Lyngbye's sedge swathes	GNR	S1	<i>Carex lyngbyei</i>
Pickleweed mats	G4	S3	<i>Sarcocornia pacifica</i> (<i>Salicornia depressa</i>)
Hardstem and California bulrush marshes	G4	S3	<i>Schoenoplectus californicus</i>
Coastal dune willow thickets	G4	S3	<i>Salix hookeriana</i> is dominant in the low tree canopy with <i>Baccharis pilularis</i> , <i>Morella californica</i> , <i>Rubus</i> spp., and <i>Salix lasiolepis</i>

Habitat Type	Global Rank ¹	State Rank ¹	Characteristic species ¹
Salmonberry – Wax myrtle scrub	G5	S3	<i>Morella californica</i> is dominant in the shrub canopy with <i>Rubus ursinus</i> in the understory. No <i>Rubus spectabilis</i> is present in the BSA.
Salal-berry brambles: <i>Rubus ursinus</i> association		Sensitive	<i>R. ursinus</i> dominant in the shrub canopy

Footnotes:

¹ Characteristic species and rankings from A Manual of California Vegetation (Sawyer et al. 2009).

Column Header Categories and Abbreviations:

Global Rank: Global Rank from NatureServe’s Heritage Methodology (NatureServe 2021 (ranking according to degree of global imperilment - G1 = Critically Imperiled—At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors; G2 = Imperiled—At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors; G3 = Vulnerable—At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors; G4 = Apparently Secure—Uncommon but not rare; some cause for long-term concern due to declines or other factors; G5 = Secure—Common; widespread and abundant. (NatureServe 2022

State Rank: State Rank from NatureServe’s Heritage Methodology (NatureServe 2022) (ranking according to degree of imperilment in the state (California) – S1 = Critically Imperiled—Critically imperiled in the state because of extreme rarity (often 5 or fewer populations) or because of factor(s) such as very steep declines making it especially vulnerable to extirpation from the state; S2 = Imperiled—Imperiled in the state because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the state; S3 = Vulnerable—Vulnerable in the state due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the state.

Wetland delineations were completed for the Project on July 21-22 and August 23, 2022, to determine the extent of wetlands and other waters within the Project Area based on hydrophytic vegetation, hydric soils, and wetland hydrology using methods and indicators outlined in the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys and Coast Region. The Project Area falls within the Coastal Zone; thus three-parameter and one-parameter wetlands were documented.

The BSA broadly contains four types of three-parameter wetlands, and one large one-parameter wetland consisting of stands of willow trees, wax myrtles, alders, and hydrophytic herbs (Appendix C, Table 4.4-2).

Table 4.4-2 Wetlands Within the Delineated Area

Aquatic Resource Name	Wetland Type	Location (lat/long) of polygon center	Aquatic Resource Size (ft ²)
Wetland 1	1-parameter	Scattered stands of willows, wax myrtle, red alder and hydrophytic herbs throughout Manila	128,550 ft ²
Wetland 2	3-par Palustrine emergent ditches	Along Peninsula Road	14,885 ft ²
Wetland 3	3-par Palustrine emergent wetlands	Between Victor Blvd and shore, between Young Lane and shore.	15,050 ft ²
Wetland 4	3-par Freshwater forested shrub wetland	Gully	7,170 ft ²
Wetland 5	3-par Estuarine and marine wetland	Shore of Humboldt Bay	7,795 ft ²
Total Wetlands in Project Area			173,450 ft²

Based on the current design, the Project would not impact SNCs. Temporary and permanent impacts to delineated wetlands are summarized in Table 4.4-3. Impacts to wetlands would result in a potentially significant impact.

Table 4.4-3 Temporary and Permanent Wetland Impacts

Impact Type	Total Within Project Area ft ²	Temporary Impact ft ²	Permanent Impact ft ²
One Parameter Wetlands	128,550	16,420 (0.38 acre)	837 (0.02 acre)
Three Parameter Wetlands	44,900	18,538 (0.43 acre)	250 (0.01 acre)

Mitigation

Implementation of Mitigation Measure BIO-7 and BIO-8 would reduce the potential impact to wetlands.

Mitigation Measure BIO-7: Avoidance and Minimization Measures to Protect Adjacent Wetlands

The Manila CSD shall implement the following avoidance and protection measures for Waters of the United States and Waters of the State adjacent to areas of planned disturbance that will not be impacted (filled or excavated) during Project construction:

- The Manila CSD shall attempt to avoid or minimize impacts to wetlands/waters to the greatest extent feasible in the final design plans.
- Adjacent wetlands shall be clearly identified in the final construction documents (100% design planset)
- Suitable perimeter control measures, such as silt fences, or straw wattles shall be placed below all construction activities at the edge of surface water features to intercept sediment before it reaches the waterway. These measures shall be installed prior to any clearing or grading activities.

Mitigation Measure BIO-8: Compensate for Loss of Wetlands

The Project shall avoid fill and conversion of seasonal wetlands and waters, to the extent feasible. If fill cannot be avoided, the Project shall compensate for the loss of seasonal wetland habitat to ensure there is no net loss in wetlands. The Project shall compensate for impacts to identified wetlands through restoration, rehabilitation, and/or creation of wetland at a ratio of no less than 1:1 and to the satisfaction of jurisdictional agencies.

A Habitat, Mitigation, and Monitoring Plan (HMMP) shall be prepared in coordination with the NCRWQB, the USACE, and the Coastal Commission. Onsite locations for three-parameter wetland mitigation shall occur along existing drainage ditches, at the locations where rain gardens would be installed, and the locations where drainage ditch connection will be created. Onsite locations for one-parameter wetland mitigation shall occur within the Manila Community Park area. The Plan shall be acceptable to the regulatory agencies with jurisdiction over wetlands and waters and include the following elements: 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, monitoring schedule, and remedial measures. The Plan shall be implemented by the Manila CSD.

The Project shall also compensate for impacts to other waters by obtaining required permits from the USACE, the NCRWQCB, and Coastal Commission shall be received prior to the start of any on-site construction activity. The Manila CSD shall ensure any additional measures outlined in the permits are implemented.

With the implementation of Mitigation Measure BIO-7 and BIO-8, 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 corridors refer to established migration routes commonly used by resident and migratory species for passage from one geographic location to another. Maintaining the continuity of established wildlife corridors is important to: (a) sustain species with specific foraging requirements, (b) preserve a species' distribution potential, and (c) retain genetic

diversity among many wildlife populations. Therefore, resource agencies consider wildlife corridors to be a sensitive resource.

No Essential Connectivity Areas have been identified within the BSA, and the nearest is approximately 20 miles east (Appendix E). However, based on the observation of the riparian habitat, dense understory, and deciduous tree canopy cover, the area within and adjacent to the Manila Community Park has the potential to function as a riparian corridor for bird species. Shrub cover along drainage areas, roads, and railroad tracks may facilitate the movement of songbird species, provide nesting habitat, and provide cover from predator species by acting as a hedgerow. Although these features facilitate connectivity, this is a highly disturbed area by recreationalists in the Manila Community Park and vehicular traffic, which can negatively influence reproductive success. Residential roads and State Route 255 may also be barriers to certain species' movement.

The BSA is not located within or near a "natural landscape block" identified in the California Essential Habitat Connectivity Project. The nearest natural landscape block is located approximately 14 miles northeast of the BSA (Appendix E). There is hydrologic connectivity between small portions of the BSA and the margins of Humboldt Bay. The Project does not include any elements that would impede migration of native resident or migratory fish. The Project also does not include any elements that would result in new barriers to terrestrial wildlife movement. The Project would not interfere with the migration of birds, bats, or other species. No impact would result.

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

The Project is located within the Humboldt Bay Area Plan of the Humboldt County LCP (Humboldt County 2022). The Humboldt Bay Area Plan identifies land uses and standards by which development will be evaluated within the Coastal Zone as defined by the California Coastal Act. The indicated uses and standards adopted by Humboldt County, and certified by the CCC, are in conformance and satisfy the policies and requirements for coastal land use contained in the California Coastal Act and other related legislation. Section 3.30 of the Humboldt Bay Area Plan describes the Natural Resources Protection Policies and Standards. The Humboldt Bay Area Plan defines ESHA as "any area in which plant or animal life or their habitats are either rare, including locally rare, or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." Chapter 3 of the Humboldt Bay Area Plan identifies the following environmentally sensitive habitats within the Humboldt Bay Planning Area:

- Wetlands and estuaries, including Humboldt Bay and the mouth of the Mad River
- Vegetated dunes along the North Spit to the Mad River and along the South Spit
- Rivers, creeks, gulches, sloughs and associated riparian habitats, including Mad River Slough, Ryan Slough, Eureka Slough, Freshwater Slough, Liscom Slough, Fay Slough, Elk River, Salmon Creek, and other streams
- Critical habitats for rare and endangered species listed on State or federal lists

With the implementation of Mitigation Measure BIO-7 and BIO-8, SNCs and wetlands located within the Project Area would not be significantly impacted. The Project would not conflict with any policies in the Humboldt Bay Area Plan. With the incorporation of Mitigation Measure BIO-7 and BIO-8, any potential impact would be less than significant.

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.

4.5 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		

Impact analysis related to cultural resources is based on the Cultural Resource Investigation (CRI) prepared for the Project (Roscoe and Associates 2022). The study area is termed the Area of Potential Effect (APE). The APE is located in Wiyot ancestral lands surrounding Humboldt Bay.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (No Impact)

The CRI included the review of two railroads, eighteen historic-period buildings, one historic period building complex and one historic district within 0.5 miles of the APE. Three historic period buildings were also documented within 100 feet of the APE, and all three of these buildings were found to be ineligible for the National, State and local designation through survey evaluation. Within the CRI, one historical resource, property, or structure was identified within the APE.

The Eureka and Klamath River Railroad (E.K.R Railroad) (P-12-002457) was constructed in 1897 and is historically significant and eligible for the California Register of Historical Places Criterion A based on its association with the historic redwood lumber industry in the American West. The E.K.R Railroad may also be eligible under Criterion B for its association with the locally significant Vance family who built the railroad. Current Project plans do not propose any alterations to the E.K.R Railroad (P-12-002457). Although this resource is present in six locations, the proposed Project would not cause a substantial adverse change to the resource (Roscoe and Associates 2022). A less than significant impact would result.

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

Within the CRI, field surveys did not yield artifacts, features, sites or other archaeological cultural resources. Twelve Wiyot archaeological sites were reported within 0.5 miles of the Project Area. No resources are documented in the direct APE; however, several sites are located in very close proximity (within 100 feet).

Native American tribes and individuals and the NAHC were contacted by Roscoe and Associates to discuss the proposed Project. This correspondence resulted in recommendations for monitoring all excavation work related to this Project. Due to historical residential and commercial development in this area, archaeological sites may not be observable during surface survey, and in many cases, their exact locations are unknown. The Bear River Band of Rohnerville Rancheria THPO specifically requested that a monitor from the Bear River Band of Rohnerville Rancheria be present during excavations in specific locations within the Project Area. Wiyot Tribe and Blue Lake Rancheria THPOs also recommended that a tribal monitor be present during construction activities in specific locations within the Project Area. The CRI includes a monitoring plan that identifies postimplementation recording requirements, how discoveries would be addressed, and how collections would be curated or reburied.

Although no archaeological resources were observed, in order to provide protection for archaeological resources that may be inadvertently discovered during the course of construction, Mitigation Measure CR-1 would be implemented to

establish protocols for inadvertent archaeological discovery. With the implementation of Mitigation Measure CR-1 the potential impact would be less than significant.

Mitigation

Implementation of Mitigation Measures CR-1 would reduce the potential impact to archaeological resources or human remains by requiring a cultural monitor and providing procedures that shall be taken in the event of inadvertent discovery.

Mitigation Measure CR-1: Cultural Monitoring and Inadvertent Archaeological Discoveries

The Manila CSD will retain a qualified cultural resource monitor who is approved by the Wiyot Tribe, Bear River Band of the Rohnerville Rancheria, and the Blue Lake Rancheria to monitor ground disturbing activities related to this Project in areas the Tribes deem culturally sensitive, specifically:

- Any ground disturbance within ~100 feet of a recorded site
- Excavation meeting or exceeding 1 foot (below historical flow line) within existing drainage channels
- In locations where new culverts will be placed and excavation meets or exceeds 1 foot below existing culvert flow line
- In locations where grading is occurring to construct new drainage features regardless of the excavation depth
- Any excavation where the construction inspector is not present to oversee that the excavation does not exceed the lines or grades on the final design construction plans

The Manila CSD will contact the three Tribal Historic Preservation Officers or their functional equivalent to set up and implement a cultural monitoring contract when a construction schedule has been determined. Advanced coordination with the qualified cultural monitor is required. The Manila CSD shall provide written verification for compliance with this Condition. If cultural or historic-era resources are encountered during construction activities, the contractor on site shall cease all work in the immediate area and within a 66-foot buffer of the discovery location. A qualified archaeologist, as well as the Tribal Historic Preservation Officers for the Bear River Band Rohnerville Rancheria, Blue Lake Rancheria, and Wiyot Tribe shall be contacted to evaluate the discovery and, in consultation with the applicant and lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or faunal remains, and human burials.

Implementation of Mitigation Measure CR-1 would reduce the potential impacts to a less-than-significant level during construction because a plan would be implemented to require a cultural monitor, 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)

While the CRI did not determine archaeological resources were likely to be present within the APE, inadvertent discovery of human remains may still occur. In the event human remains are encountered during construction, Mitigation Measure CR-2 would be implemented to ensure any potential impact would be less than significant.

Mitigation

Implementation of Mitigation Measure CR-2 would reduce the potential impact to archaeological resources or human remains by requiring procedures that shall be taken in the event of inadvertent discovery.

Mitigation Measure CR-2: Inadvertent Discovery of Human Remains

If human remains are discovered during Project construction, work will 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 Humboldt County Coroner will be contacted to determine if the cause of death must be investigated. If the Coroner determines that the remains are of Native American origin, it is necessary to comply with State laws relating to the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage Commission (NAHC, PRC, Section 5097). The Coroner will contact the NAHC. The descendants or most likely descendants of the deceased will be contacted, and work will not resume until they have made a recommendation to the landowner or 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-2 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.

4.6 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 with Mitigation)

Construction of the Project would involve a variety of earthwork and construction practices, involving the use of heavy equipment as discussed in Section 4.3 (Air Quality). Construction would require the use of fuels, primarily gas, diesel, and motor oil. Construction emissions were estimated using CalEEMod version 2020.4.0 and were estimated to be approximately 49 MTCO_{2e} from all construction activities (Appendix B). The Project's construction emissions equal 1.6 MTCO_{2e} per year when annualized over the assumed 30-year lifespan of the Project. Peak travel associated with Project construction would consist of approximately 38 vehicular round trips per day, and construction equipment would remain staged in the Project Area once mobilized. Excess soils and construction materials would be stored on-site within previously designated staging areas only. Excess soils may be re-used on-site for backfill and finished grading. Excess soils would not remain stockpiled on-site once the Project is complete. The contractor may haul additional excess soils off-site for legal use at other permitted sites.

Inefficient construction-related operations would also be avoided due to the measures in Mitigation Measure AQ-1 (Measures to Reduce Air Pollution). 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 Mitigation Measure AQ-1). Because construction would not encourage activities that would result in the use of large amounts of fuel and energy in a wasteful manner, and the incorporation of Mitigation Measure AQ-1 would reduce idling time, impacts related to the inefficient use of construction-related fuels would be less than significant with mitigation.

Operation of the Project would include maintenance and monitoring as described in the Project Description and would be consistent with the existing maintenance and monitoring of the existing stormwater infrastructure. Operation and maintenance of the Project would not generate additional vehicle trips nor result in an increase in energy use above existing conditions. The potential for wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant with the incorporation of Mitigation Measure AQ-1.

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 Integrated Energy Policy Report (IEPR), Senate Bill (SB) SB 100, Renewable Portfolio Standard (RPS) or other relevant State regulations or plans. 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.

The Project would not inefficiently utilize energy due to incorporation of Mitigation Measure AIR-1, which limits idling time and provides measures to protect air quality. 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. Operationally, the Project would not generate an increase in vehicle trips above

existing conditions. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impact would result.

4.7 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 is located adjacent to an existing highway (SR 255) on the Samoa Peninsula, within the community of Manila. The Project Area is generally flat with regional geology likely influenced by seismic activity as a result of the relatively close proximity of the Mendocino Triple Junction to the Project. A spur of the Mad River Fault Zone is located approximately 3.5 miles northeast of the Project, and a spur of the Little Salmon Fault Zone is located approximately five miles south of the Project as mapped by the California Geological Survey (CGS 2022). Review of historical aerial photographs indicates that the majority of the Project Area was formerly sand dunes between the Pacific Ocean to the west, and Humboldt Bay to the east.

The Project Area is predominantly comprised of Urban land-Anthraltic Xerorthents association soils with zero to two percent slopes, with a small portion of the southern extent of the Project Area is comprised of Hydraquents-Wassents mucky silt loam, strongly saline soils with zero to three percent slopes, and a small portion at the community center of Lanphere soils with two to 75 percent slopes (Appendix E of Appendix C). The Urban land-Anthraltic Xerorthents association contains gravelly loamy fine sand in the upper horizon (to a depth of six inches), underlain by sandy loam to a depth of 31 inches, followed by gravelly sand to 43 inches and underlain by sand.

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)

According to the California Geological Survey, there are no earthquake fault zones in the Project Area or vicinity. The closest fault zone is located in Arcata approximately 3.5 miles northeast of the Project Area (CGS 2022). Construction and operation of the Project would have no effect on a known earthquake fault because none exist in the Project Area. No impact would result.

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

The Project is situated within a seismically active area close to several seismic sources capable of generating moderate to strong ground motions. Because the Project is located within a seismically active area, the probability that strong ground shaking associated with large magnitude earthquakes would occur during the design life of the Project is high.

The Project Area is in proximity to numerous latest Quaternary faults located in both the onshore and offshore areas, including the Cascadia subduction zone, Gorda plate, and shallow upper plates (e.g., Mad River and Little Salmon fault zones). The Mendocino fault zone and San Andreas fault also have the potential to generate strong ground motion in the Project Area. The Humboldt County coast is a highly active tectonic region that has been subjected to numerous earthquakes of low to moderate strength and occasionally to very strong earthquakes. Seismicity in the region is attributed primarily to the Mendocino Triple Junction, the interaction between the Pacific, Gorda, and North American plates. Project implementation would not increase risk of strong seismic ground shaking above existing conditions.

Given the Project would not increase the risk of strong seismic ground shaking, 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.

Expansive soils can cause considerable distress to roads and building foundations as they “rise-and-fall” in accordance with the cycles of soil wetting (swelling) and drying (shrinking). Soils with high percentages of silicate clays are those that have the potential for shrinking and swelling.

The Project is located in a mapped liquefaction hazard zone (Humboldt County 2022a). Implementation of the Project would not exacerbate potential liquefaction, rather the potential for liquefaction would remain unchanged following Project implementation. The Project is located on the northern portion of the Samoa Peninsula and is generally flat. The Project Area does not include steep slopes or hillsides and thus, does not have the potential for landslides. Soils with high percentages of silicate clays are those that have the potential for shrinking and swelling. Mapping by the NRCS shows the Project Area to have the highest percentage of clay content ranging between one percent and 37 percent with Plasticity Index values of 1 and 15. Thus, those soils are considered to have a low potential for expansion, and implementation of the Project would not exacerbate potential liquefaction or landslides. Therefore, 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 Impact)

The Project Area is comprised of sandy substrate, predominantly sandy loam at depths less than four feet from the surface (Appendix E of Appendix C). 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 Humboldt County Municipal Code and the SWPPP would be required as part of the Project. Erosion prevent measures would include silt fences, straw wattles, soil stabilization controls, and site watering for controlling dust. Erosion prevent measures would be 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.

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 wastewater infrastructure.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Less Than Significant 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).

It is unlikely that Project construction would impact potentially significant paleontological resources because most of the Project occurs in relatively newly deposited alluvium. However, the possibility of encountering a paleontological resource during construction cannot be completely discounted, therefore, the impact related to the potential disturbance or damage of previously undiscovered paleontological resources, if present, is considered potentially significant.

Mitigation

Implementation of 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

In the event that fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities shall be diverted away from the discovery within 50 feet of the find, and a professional paleontologist shall be notified 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 will be properly curated and preserved.

Therefore, 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.

4.8 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	

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

NCUAQMD has not adopted regulations regarding the evaluation of greenhouse gas (GHG) emissions in a CEQA document and has not established CEQA significance criteria to determine the significance of impacts with regard to GHGs. The NCUAQMD has stated that they would not comment adversely on the use of thresholds of significance from the Bay Area Air Quality Management District (BAAQMD) for projects within Humboldt County. However, the BAAQMD has recently revised their adopted recommended CEQA thresholds of significance for GHG. The BAAQMD’s Justification Report for the newly adopted greenhouse gas thresholds identify the thresholds as specific for ‘development projects’ of commercial/residential development and other projects. Per the Draft Justification Report:

The Air District has developed these thresholds of significance based on typical residential and commercial land use projects and typical long-term communitywide planning documents such as general plans and similar long-range development plans. As such, these thresholds may not be appropriate for other types of projects that do not fit into the mold of a typical residential or commercial project or general plan update.

Lead agencies should keep this point in mind when evaluating other types of projects. A lead agency does not necessarily need to use a threshold of significance if the analysis and justifications that were used to develop the threshold do not reflect the particular circumstances of the project under review. Accordingly, a lead agency should not use these thresholds if it is faced with a unique or unusual project for which the analyses supporting the thresholds as described in this report do not squarely apply. In such cases, the lead agency should develop an alternative approach that would be more appropriate for the particular project before it, considering all of the facts and circumstances of the project on a case-by-case basis. (emphasis added)

Additionally, the BAAQMD’s Justification Report states:

There is no proposed construction-related climate impact threshold at this time. Greenhouse gas emissions from construction represent a very small portion of a project’s lifetime GHG emissions. The proposed thresholds for land use projects are designed to address operational GHG emissions which represent the vast majority of project GHG emissions. (BAAQMD 2022)

The BAAQMD’s thresholds do not include guidance for infrastructure projects or to construction-generated emissions. Therefore, the Sacramento Metropolitan Air Quality Management District’s (SMAQMD) and South Coast Air Quality Management District’s (SCAQMD) recommended GHG methodology and thresholds for construction and operational impacts were applied. For Project construction, SMAQMD has a threshold of 1,100 metric tons of carbon dioxide (MTCO_{2e}) per year threshold of significance (SMAQMD 2021). SCAQMD recommends a threshold of 1,100 MTCO_{2e} applied to construction and operation; SCAQMD recommends that construction emissions be amortized over the life of the project, defined as 30 years, and added to the operational emissions for comparison against the threshold of significance.

In order to assess the potential impact of construction-generated emissions, the construction GHG emissions were annualized over an assumed 30-year Project lifespan and added to operational emissions. Based on CalEEMod modeling (attached as Appendix B), Project construction activities would result in a small, temporary increase in GHG emissions, including exhaust emissions from on-road trucks, worker commute vehicles, and off-road heavy-duty equipment. Construction would require clearing, earthmoving, and delivery equipment, as used for similar Projects, and which have been accounted for in the State’s emission inventory and reduction strategy for both on and off-road vehicles. Construction emissions were estimated using CalEEMod version 2020.4.0 and were estimated to be approximately 49 MTCO_{2e} from all construction activities. The Project’s construction emissions equal 1.6 MTCO_{2e} per year when annualized over the assumed 30-year lifespan of the Project. Project operation and maintenance would substantively be similar to existing conditions and would not result in an increase in GHG emissions above existing operations activities. Therefore, the Project’s GHG emissions would be less than significant.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Less Than Significant)

The California Air Resource Board (CARB) 2022 Scoping Plan identifies a path to meet the SB 32 GHG emission reduction goals, as well as reducing anthropogenic GHG emissions to 85 percent below 1990 levels by 2045, and achieving carbon neutrality by 2045 or earlier, consistent with Assembly Bill 1279 (AB 1279). The 2022 Scoping Plan includes measures to move to a zero-emissions (decarbonized) transportation sector and phasing out the use of natural gas in residential and commercial buildings. The 2022 Scoping Plan would also reduce emissions of short-lived climate pollutants (SLCPs) and includes mechanical CO₂ removal and carbon capture and sequestration actions, as well as natural working lands management and nature-based strategies. The plan’s measures are identified in Table 2-2 and Table 2-3 of the 2022 Scoping Plan. The measures are statewide and programmatic in nature. The 2022 Scoping Plan is largely advisory, as CARB does not directly regulate many of the sectors identified by the plan’s measures.

The 2022 Scoping Plan states that local action by municipalities can support and amplify efforts to reduce GHGs. Local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment. Local actions, provided in Appendix D of the 2022 Scoping Plan, are not required by statutory or gubernatorial direction, and are not binding, but contain guidance and information regarding actions that other jurisdictions may choose to take that complement the 2022 Scoping Plan measures. However, the 2022 Scoping Plan measures are broad policy and regulatory initiatives that would be implemented at the state level and do not relate to the construction and operation of individual projects such as the Project.

Project construction would cause a temporary increase in GHGs; however, as discussed above Project emissions would not exceed the identified emission thresholds. The Project is analyzed for consistency with the 2022 Scoping Plan in Table 4.8-1 – Consistency Analysis Between Project and 2022 Scoping Plan. As shown in the table, the Project is consistent with the actions for the Scoping Plan scenario outlined in 2022 Scoping Plan for AB 32 GHG inventory sectors. Therefore, the Project would not conflict with SB 32, AB 1279, or the 2022 Scoping Plan and would result no impact.

Table 4.8-1 Consistency Analysis Between Project and 2022 Scoping Plan

Scoping Plan Sector and Action	Consistency/Applicability Determination
GHG Emissions Reductions Relative to the SB 32 Target – 40% below 1990 levels by 2030.	Not Applicable. This is a statewide measure that cannot be implemented by the Project or lead agency.
Smart Growth / Vehicle Miles Traveled (VMT) – VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	Not Applicable. This is a statewide measure and VMT reduction goal that is not applicable to all individual projects due to regional variations and growth projections. Additionally, the Project would not generate new or increased operational trips.
Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs) – 100% of LDV sales are ZEV by 2035.	Not Applicable. This is a statewide measure that cannot be implemented by the Project or lead agency. However, the

Scoping Plan Sector and Action	Consistency/Applicability Determination
	standards would be applicable to the light-duty vehicles that would access the Project Area during construction and operation.
Truck ZEVs <ul style="list-style-type: none"> – 100% of medium-duty (MDV)/HDV sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report). 	Not Applicable. This is a statewide measure that cannot be implemented by the Project or lead agency.
Aviation <ul style="list-style-type: none"> – 20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. – Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries. 	Not Applicable. This is a statewide measure that cannot be implemented by the Project or lead agency. The Project does not involve an aviation uses.
Ocean-going Vessels (OGV) <ul style="list-style-type: none"> – 2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. – 25% of OGVs utilize hydrogen fuel cell electric technology by 2045. 	Not Applicable. The Project does not involve ocean-going vessels.
Port Operations <ul style="list-style-type: none"> – 100% of cargo handling equipment is zero-emission by 2037. – 100% of drayage trucks are zero emission by 2035. 	Not Applicable. The Project does not involve a port.
Freight and Passenger Rail <ul style="list-style-type: none"> – 100% of passenger and other locomotive sales are ZEV by 2030. – 100% of line haul locomotive sales are ZEV by 2035. – Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity. 	Not Applicable. The Project does not involve freight or passenger rail.
Oil and Gas Extraction <ul style="list-style-type: none"> – Reduce oil and gas extraction operations in line with petroleum demand by 2045. 	Not Applicable. The Project does not involve oil or gas extraction.
Petroleum Refining <ul style="list-style-type: none"> – CCS on majority of operations by 2030, beginning in 2028. – Production reduced in line with petroleum demand. 	Not Applicable. The Project does not involve or petroleum refining.
Electricity Generation <ul style="list-style-type: none"> – Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMT_{CO2e}) in 2030 and 30 MMT_{CO2e} in 2035. – Retail sales load coverage. – 20 gigawatts (GW) of offshore wind by 2045. – Meet increased demand for electrification without new fossil gas-fired resources. 	Not Applicable. This measure would apply to electricity providers. The Project is not an electricity provider.
New Residential and Commercial Buildings <ul style="list-style-type: none"> – All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030. 	Consistent. The Project does not include new residential or commercial buildings.
Existing Residential Buildings <ul style="list-style-type: none"> – 80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. – Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030. 	Not Applicable. This is a measure for the state to modify its requirements for appliance sales to affect energy efficiency of existing residential buildings. The Project would not include appliance manufacturing or sales, or continued use of existing residential buildings.

Scoping Plan Sector and Action	Consistency/Applicability Determination
Existing Commercial Buildings <ul style="list-style-type: none"> – 80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. – Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030. 	Not Applicable. The Project would not include continued use or existing commercial buildings.
Food Products <ul style="list-style-type: none"> – 7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045. 	Not Applicable. The Project does not include agricultural or mass food production.
Construction Equipment <ul style="list-style-type: none"> – 25% of energy demand electrified by 2030 and 75% electrified by 2045. 	Not Applicable. Although the Project would involve the use of construction equipment, construction would occur in 2024, prior to the electrification goal. Additionally, the Project would not own the construction fleet used.
Chemicals and Allied Products; Pulp and Paper <ul style="list-style-type: none"> – Electrify 0% of boilers by 2030 and 100% of boilers by 2045. – Hydrogen for 25% of process heat by 2035 and 100% by 2045. – Electrify 100% of other energy demand by 2045. 	Not Applicable. This measure would apply to the energy sources for pulp and paper manufacturers. The Project is not pulp or paper manufacture.
Stone, Clay, Glass, and Cement <ul style="list-style-type: none"> – CCS on 40% of operations by 2035 and on all facilities by 2045. – Process emissions reduced through alternative materials and CCS. 	Not Applicable. This measure would apply to the direct GHG emissions from CCS industries. The Project is not a CCS industry.
Other Industrial Manufacturing <ul style="list-style-type: none"> – 0% energy demand electrified by 2030 and 50% by 2045. 	Not Applicable. This measure would apply to the energy sources for industrial manufacturers. The Project is not an industrial manufacturer.
Combined Heat and Power <ul style="list-style-type: none"> – Facilities retire by 2040. 	Not Applicable. This measure would apply to the existing combined heat and power energy facilities. The Project is not combined heat and power facility.
Agriculture Energy Use <ul style="list-style-type: none"> – 25% energy demand electrified by 2030 and 75% by 2045. 	Not Applicable. The Project does not include agricultural production.
Low Carbon Fuels for Transportation <ul style="list-style-type: none"> – Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen. 	Not Applicable. This measure would apply to the bulk fuel providers The Project is not a fuel provider.
Low Carbon Fuels for Buildings and Industry <ul style="list-style-type: none"> – In 2030s blended in pipeline. – Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040. – In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters. 	Not Applicable. This measure would apply to natural gas utilities and energy providers. The Project is not an energy provider.
Non-combustion Methane Emissions <ul style="list-style-type: none"> – Increase landfill and dairy digester methane capture. – Some alternative manure management deployed for smaller dairies. – Moderate adoption of enteric strategies by 2030. – Divert 75% of organic waste from landfills by 2025. – Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand. 	Consistent. The Project does not include a landfill or dairy. The Project would reduce construction waste with implementation of state mandated recycling and reuse mandates.
High GWP Potential Emissions <ul style="list-style-type: none"> – Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions. 	Not Applicable. The Project does not include appliances that would use refrigerants.

Source of Scoping Plan Reduction Measures: CARB 2022

4.9 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	

Impact analysis is based on the Corridor Study Report (CSR), which was conducted for this Project in 2022 (GHD 2022). The CSR's purpose is to identify areas of potentially impacted soil and/or groundwater limited to 1/8 mile along the Project Area that may require special handling and disposal during construction or would potentially pose a health exposure risk to construction workers. The CSR accumulates and reviews pertinent and reasonably ascertainable information to develop an independent professional opinion of the environmental condition of the Project Area and to identify potential, probable or actual environmental contamination that may impact Project construction design. The CSR was completed as part of the due diligence assessment process to evaluate potential environmental liabilities associated with the Project Area.

This CRS was completed in general conformance with the American Society of Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process 1527-13 and the Caltrans ISA (Standard Environmental Reference, Volume 1, Chapter 10). Interviews were not conducted with current or past property owners, tenants, or occupants of the properties located within the Project Area and constitutes a deviation from the ASTM and Caltrans standards.

The CRS included reviewing government records for properties within one-eighth (1/8) of a mile (660 feet) of the Project Area boundaries that may have potential for environmental concern during construction. The basis for the records review was a government database search conducted by Environmental Data Resources Inc. (EDR), as part of the ISA.

The CSR identified locations where potentially impacted soil and/or groundwater may be encountered. As the assessment was conducted, the sites were assigned a GHD Hazard Class ranging from one to four, which was used to categorize sites based on potential risk. The GHD hazard classes are defined as follows:

- Hazard Rank 1: A site that would likely affect Project construction. Contamination of soil and/or groundwater is confirmed to be within the Project Area.
- 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 Area 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.

The CRS identified four locations identified with a Hazard Rank of 2, including within Project Area boundaries that may be contaminated. This is further detailed in Section d) below.

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 CSR further researched listed sites that have the potential to affect the Project by reviewing available records on the SWRCB GeoTracker Website. The CSR conducted a field reconnaissance within the Project Area on June 22, 2022, where access was granted to determine if potential sites of concern existed which were not listed in the EDR Report. The Project Area reconnaissance was also performed to verify the locations of listed sites. Aerial photographs from 1941 to 2016, and historical topographic maps from 1933 to 2018 were provided by EDR and reviewed during the completion of the ISA.

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

Construction of the Project would include the transport and use of common hazardous materials inherent to the construction process, including petroleum products such as fuel and lubricants for construction equipment and vehicles, 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.

Hazardous materials storage, handling, and transportation must comply with an interconnected matrix of local, state, and federal laws. Hazardous materials used during construction of the Project would be subject to applicable regulations, including California Health and Safety Code Section 25531, Division 20, Chapter 6.5, and other standards enforced by the various departments and boards under the California Environmental Protection Agency (Cal/EPA). The Project would be subject to Cal/EPA hazardous materials regulations consolidated under the state's Unified Program enforced by the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), North Coast Regional Water Quality Control Board (Regional Board), NCUAQMD, and the Department of Resources Recycling and Recovery (CalRecycle). The Cal/EPA administers the Unified Program via local Certified Unified Program Agencies (CUPAs). The CUPA for Humboldt County is the Humboldt County Division of Environmental Health (HCDEH). The HCDEH Hazardous Materials Unit has jurisdiction over the Project Area and is tasked with local CUPA inspections and compliance. Project activities involving the transport, use, storage, and disposal of hazardous materials would be in accordance with established rules and regulations.

Worker exposure to hazardous materials is regulated by California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) and requires worker safety protections. Cal/OSHA enforces hazard communication regulations which require worker training and hazard information (signage/postings) compliance. In addition, hazard communication compliance includes procedures for identifying and labeling hazardous substances, communicating information related to hazardous substances storage, handling, and transportation; and preparation of health and safety plans to protect employees.

Project construction specifications would require the management of hazardous materials to comply with applicable laws, rules, and regulations. During Project construction, the contractor would be required to contain hazardous

materials and avoid exposure to workers, the public, and surrounding environment during construction. An appropriate facility would be utilized for legal disposal of any hazardous materials generated.

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 2.1 – 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, as described in Section 4.10 (Hydrology and Water Quality).

The established regulatory framework, BMPs, and requisite construction protocols provide appropriate risk mitigation and hazard protections, thus the Project would not create a significant hazard to the public or environment from hazardous materials. Because the Project 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 Project construction would be less than significant.

Following construction, operation of the Project would require intermittent maintenance and repair, which could involve hazardous materials. The operational risk posed by intermittent maintenance and repair of the road specific to hazardous materials is low. The potential to create a significant hazard to the public or the environment during Project operation would be less than significant.

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)

The Project would utilize heavy machinery to perform some construction-related tasks including grading, drilling, 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. Equipment on site during construction would be required to have emergency spill cleanup kits immediately accessible in the case of any fuel or oil spills. Equipment would not be refueled near the Humboldt Bay or any perennial wetland. If equipment must be washed, it would be washed off-site. The 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)

The Redwood Coast Montessori school is located within 0.25 mile of the Project at the Manila Community Center. 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. 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 Project 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 a less than significant impact on the Redwood Coast Montessori school.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Less Than Significant With Mitigation)

The CSR identified no recognized environmental conditions (RECs) in the Project Area. An REC is defined in the ASTM Standard as:

1. The presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; or
2. The likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or
3. The presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment

The CRS found evidence of historic or present land uses on adjoining properties that may have generated or caused the release of regulated or hazardous materials to the environment. Therefore, the following findings represent business environmental risks (BERs), defined by the ASTM standard as “a risk which can have material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel or commercial real estate”.

Redwoods United, Inc., a site assigned a Hazard Rank of 3, is not known to be contaminated, but due to current or historical use, has the potential for soil and groundwater contamination that could affect Project construction. However, Redwoods United, Inc. is not identified on the State Water Resources Control Board Geotracker website. Redwoods United, Inc. was assigned a Hazard Rank of 3 due to its historical use of hosting a 550-gallon leaded fuel tank. The physical address of 1611 Peninsula Drive is currently occupied by Redwood Coast Montessori School and the Manila Community Center, making it unlikely that the property is being regulated for environmental contamination. The site is not known to be contaminated, but due to current or historical use, it could possibly have contamination that could affect Project construction.

The Big Oil property, a site assigned a Hazard Rank 2, has the potential to affect the Project either because of the presence of contamination that may likely migrate into the Project Area or because the extent of contamination is unknown. It was assigned a Hazard Rank of 2 because of identified contamination which has been subsequently cleaned. The Big Oil site is located at 180 Lupin Drive, Manila, California and is further identified as Humboldt County Division of Environmental Health (HCDEH) Local Oversight Program (LOP) Case Number 12667. This property is located west of the Project Area on the southeast side of Lupin Drive.

Based on information contained in the SWRCB Geotracker website and the HCDEH files, soil at the Big Oil site was impacted by a release of petroleum hydrocarbons from five former USTs and associated piping utilized at the property. Constituents of concern (COCs) for this site include petroleum hydrocarbons and metals from Leaking Underground Storage Tanks (LUSTs). HCDEH correspondence dated March 31, 2005, states that the site qualifies for No Further Action (NFA) as “No significant petroleum hydrocarbon was detected in soil and groundwater samples. Water quality objectives have been met.” The HCDEH March 2005 correspondence noted that, “Chromium, nickel, and zinc are considered background.” The HCDEH approved NFA for this case on June 9, 2006. It is unlikely that impacts from this site would affect soil and groundwater quality in the vicinity of the Project Area since the Project would not be located within 15 feet of the Big Oil site.

The Redwood Coast Trucking property at 2210 Peninsula Drive (located south of the Project Area) was assigned a Hazard Rank of 2 because it is an active site that is a hazardous waste generator as well as having aboveground petroleum storage. From the inspection record notes in the EDR report it appears that the hazardous waste generation is related to vehicle maintenance operations and storage for the trucking fleet. There are violations noted for improper waste storage and labeling in the record as recently as 2017. In addition to the current site operations, this site is listed as a LUST cleanup site in the GeoTracker database with a site ID of T06023000087 and a status of Case Closed as of 1/10/1990. Although the LUST case is closed, the report indicated the potential for reopening the case if contamination was found in the future because the UST was abandoned and not removed. The EDR report lists this site as being 211 ft from the Project Area. In addition to the close proximity to the Project Area, groundwater is assumed to be flowing toward Humboldt Bay, which means that groundwater from the Redwood Coast Trucking site is potentially flowing toward the Project Area, toward Humboldt Bay.

The Sierra Pacific Industries Arcata Division property located at 2593 New Navy Base Road (north of the Project Area) is currently occupied by A&N Logging. There has been historical contamination on the site while it was occupied by Sierra Pacific Industries and there are two regulated cases for this site in GeoTracker. This site is listed in GeoTracker

as a LUST cleanup site with site ID number T0602301628 and a regulatory status of Case Closed (for the UST case only) as of 12/14/2007. This site is also listed in GeoTracker as a Cleanup Program Site with a site ID number T0602393344 and a regulatory status of open as of 6/22/2017. The CSR assigned this site a Hazard Class of 2, with the potential for the site to have impact on the Project Area due to known contamination that has the potential to migrate in groundwater. The southwest corner of the site does have a groundwater flow direction toward Humboldt Bay (in the direction of the Project Area), and therefore potential impacts from the site cannot be eliminated.

Much of the Project Area follows the Union Pacific Railroad Corridor and roadways within the community of Manila. There is potential for shallow soil contamination of heavy metals and petroleum hydrocarbons (creosote and Polycyclic Aromatic Hydrocarbons (PAH) specifically) due to historical railroad use. Railroad corridors are commonly associated with PAHs and CAM-17 metals. Roadways that were constructed prior to the implementation of unleaded motor vehicle fuels are at risk of Aerially Deposited Lead (ADL).

Based upon this information, and with the proximity of Class 2 hazards, it is likely that contamination present from adjacent or nearby sites may likely migrate into the Project Area, and therefore a potentially significant impact could occur.

Mitigation

Implementation of Mitigation Measure HAZ-1 would reduce the impact of hazard to workers and the public to a less-than-significant level by requiring pre-characterization and protocols for contaminated soil and groundwater.

Mitigation Measure HAZ-1: Implement Corridor Study Report Recommendations

All recommendations resulting from the Corridor Study Report shall be implemented by the Manila CSD prior to, during, and following construction, as appropriate.

- If Soluble Threshold Limit Concentration (STLC) analysis exceeds regulatory levels, Soil and Groundwater Management Plan (SGMP) shall be prepared which identifies soil and groundwater handling options and protocols during construction. The SGMP will identify protocols to proactively manage potentially impacted soil and groundwater within the Project Area and reduce worker exposure.
- If the Corridor Study Report indicates constituent of concern impacts above STLC levels to soil and/or groundwater, then construction workers involved in excavation activities will be Hazardous Waste Operations and Emergency Response (HAZWOPER) trained (Occupational Safety and Health Administration [OSHA] 1910.120)

Implementation of Mitigation Measure HAZ-1 would reduce this impact to a less-than-significant level by protecting the environment and people from hazards documented in the CRS.

- 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 an airport land use plan or within two miles of a public airport. 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 Impact)**

The Project Area is covered under the Humboldt County Emergency Operations Plan (EOP). The Humboldt County EOP identifies the emergency response and evacuation policies and procedures for hazards related to earthquake, tsunami, extreme weather, flooding/flash flooding, landslides, transportation accidents, hazardous materials, interface wildlife fire, energy shortage, offshore toxic spill, civic disturbance, terrorist activities, and national security (Humboldt County 2015).

The Humboldt County EOP establishes a structure for Humboldt County Operation Area agencies to respond to large-scale emergencies requiring multiagency participation or activation of the Humboldt County Emergency Operations Center (EOC) (Humboldt County 2015). Hazard mitigation and risk assessment strategies for Humboldt County Operation Area are formalized in the Humboldt County Operational Area Hazard Mitigation Plan (HMP).

Temporary lane closures on Young Lane, Peninsula Drive, Mill Street, and Victor Boulevard may be required. Temporary lane closures would follow Humboldt County requirements, including Humboldt County encroachment permit conditions, for temporary roadway closures, including signage and public noticing requirements.

The Project would not impair implementation or physically interfere with the established Humboldt County EOP, or Humboldt County HMP. Once constructed, operational use of the Project would enhance transportation along Manila due to reduced roadway flooding. Thus, emergency response or evacuation via existing roadways would not diminish compared to existing conditions. As the Project would not impair implementation of an emergency response plan or evacuation plan, the potential impact related to the temporary road closures during construction 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 Impact)

Please see Wildfire Section 4.19 (b).

4.10 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

The Project Area does include streams or tributaries to Humboldt Bay, which is located within the Drainage Management Area I – Young Lane Area and Drainage Management Area IV – Lupine Drive/Park Street Area. Delineated wetlands would be impacted (see Section 4.4 – Biological Resources).

The Project will obtain a CWA Section 401 Water Quality Certification from the NCRWQCB and a CWA Section 404 permit from the USACE.

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

Construction activities such as site clearing, grading, excavation, and material stockpiling, placement of aggregate base, and related construction activities 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 to the Humboldt Bay. The greatest potential Project impacts to water quality would result from sediment mobilization during construction. If not properly managed, construction activities could result in erosion, as well the discharge of chemicals and materials to adjacent waterways. 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 2.1 (Environmental Protection Action 1), 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 (CGP). In addition, a SWPPP would be prepared for pollution prevention and control prior to initiating site construction activities.

The Construction SWPPP would be written by a Qualified SWPPP Developer (QSD); would identify and specify the use of best management practices (BMPs) 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 CGP to ensure the BMPs are effective. A Qualified SWPPP Practitioner (QSP) would oversee implementation of the Plan, including visual inspections, sampling and analysis, and overall compliance with the SWPPP and CGP.

Implementation of Environmental Protection Action 1, combined with Mitigation Measures BIO-7 and BIO-8 would reduce potential water quality impacts during Project construction activities to a less-than-significant level by requiring measures to minimize erosion, sediment, and pollutant contribution to surface waters.

Following construction, operation and maintenance of the Project would result in increased drainage and infiltration capacity through the creation and maintenance of bioswales, culverts, rain gardens, and valley gutters, enhancing overall ecosystem services. Therefore, less than significant 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? (No Impact)

The Project is located in the Eureka Plain Groundwater Basin 1-099 (DWR 2004) and is not listed as a basin in Critical Conditions of Overdraft (DWR 2018). 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. No impact would result.

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. The Project is not expected to result in any change in the use or recharge of any groundwater source. There would be no operational impact to groundwater.

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)

The goal of the Project is to improve drainage and reduce impacts from chronic local flooding. The Project will not alter existing drainage patterns or add additional impervious surfaces.

Erosion protection measures 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 required SWPPP, CWA Section 401, and CWA Section 404 permits would also be implemented, 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 create bioswales and rain gardens, creating a reduction in net impervious areas, increasing water infiltration and reducing the risk of substantial erosion resulting from stormwater events. 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? (No Impact)

The goal of the Project is to improve drainage and reduce impacts from chronic local flooding. The Project will improve infiltration and reduce surface runoff. The Project would have a net decrease of impervious surface through the creation through the creation and maintenance of bioswales, culverts, rain gardens, and valley gutters, resulting in beneficial environmental impacts and enhanced ecosystem services. This includes a neutral or better effect on existing local drainage, flooding, and implementation of stormwater design to contemporary standards throughout the community of Manila. The Project would not alter topography or drainage patterns in a manner that would increase on- or off-site flooding. The Project includes elements that would increase stormwater infiltration. Additionally, in compliance with Environmental Protection Action 1, the Project would develop a SWPPP to be approved by the NCRWCB, and the Project would be designed to meet NCRQWB storm water requirements. The Project would not cause on- or off-site flooding. No impact would result.

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)

Grading would occur during summer and fall months when conditions are driest, to minimize the risk of rainfall during the construction period and thus stormwater runoff when graded soils are exposed. As discussed above in Hydrology and Water Quality Section (a), requirements of the SWPPP, CWA Section 401, and CWA Section 404 permits would also be implemented, including measures to prevent polluted stormwater runoff during construction.

Operationally, the Project does not include elements that would significantly alter topography and rates of stormwater runoff. The Project would instead increase stormwater capacity through the creation and maintenance of bioswales, culverts, rain gardens, and valley gutters, increasing infiltration within the community of Manila. A less than significant impact would occur.

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

The Project Area includes areas located in the FEMA 100-year flood zone within the Drainage Management Area I – Young Lane Area and Drainage Management Area IV – Lupine Drive/Park Street Area (Figure 6 of Appendix C). Project elements within the FEMA 100-year flood zone include replacements of failing and undersized culverts and tide flap gates. The Project maintains existing drainage patterns and does not include any changes that would impede or redirect flood flows, instead it would reduce impacts of flood flows by enhancing capacity. 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)

The Project Area includes areas located in the FEMA 100-year flood zone within the Drainage Management Area I – Young Lane Area and Drainage Management Area IV – Lupine Drive/Park Street Area (Figure 6 of Appendix C). As portions of the Project Area overlap the FEMA 100-year flood zone, construction would not occur during flood conditions (see Section 1.7 – 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.

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.

The Project Area is entirely located in a tsunami hazard zone. Due to the known seismic activity in the Pacific Rim, a tsunami could impact Humboldt Bay. It is expected that the impact of a tsunami on Humboldt Bay would primarily occur along the North and south spits and the King Salmon and Fields Landing areas, which are located directly

across from the opening to Humboldt Bay. The Project would not result in any new structures or hazardous materials that could be released into the environment in the event a tsunami. Because there are existing tsunami evacuation plans for the area (including tsunami sirens), the tsunami risk is anticipated to be less than significant. The Project is therefore not expected to expose people to significant risk, loss, injury, or death from tsunami inundation.

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

The relevant water quality control plan is the NCRWQCB's Basin Plan, which establishes thresholds for key water resource protection objectives for both surface waters and groundwater. 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, which would include a SWPPP, in addition to CWA Section 401 and CWA Section 404 permits. These regulatory requirements and associated requisite monitoring would ensure a conflict with the Basin Plan does not occur. No impact would result.

4.11 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

This section evaluates the potential impacts related to land use, as it applies to construction and operation of the Project. Land use within the Project Area consists of Residential Low Density (RL), Public Recreation (PR), and Public Facility (PF) (Humboldt County 2022b). Zoning within the Project Area consists of Residential Single Family / Manufactured Home/ Archaeological Resource Area (RS-5-M/A), Public Facility – Urban/ Beach and Dune Areas (PF1/B), and Public Recreation / Archaeological Resource Area (PR/A) (Humboldt County 2022c).

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

The Project would involve construction and operation of vegetated bioswales, rain gardens, replacement of undersized and failing culverts, and new culverts. These elements would not divide any existing neighborhood or 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)

According to Humboldt County's Web GIS, the entirety of the Project is located within the Coastal Zone and is designated as being within the primary permit jurisdiction of the Humboldt County LCP (Humboldt County 2022d). The Humboldt Bay Area Plan (2022) is the Land Use Plan for this area, and the Humboldt County Coastal Zoning Code is the Implementation Plan, with the Humboldt County General Plan being advisory (Humboldt County 2017). The Project Area is within the County and State Jurisdiction of the Coastal Zone. A consolidated coastal development permit would be required from the California Coastal Commission. The Project would adhere to all requirements of the Permit.

Applicable policies adopted for the purpose of avoiding or mitigating environmental effects can be found throughout the Humboldt Bay Area Plan and Humboldt County General Plan. A review of the Humboldt Bay Area Plan and Humboldt County General Plan elements, and the policies and standards within, did not identify any inconsistencies with the proposed Project. Specifically, the Project is consistent with the following goals included in the Humboldt Bay Area Plan:

3.30 NATURAL RESOURCES PROTECTION POLICIES AND STANDARDS

**** 30240.. (Part) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.*

Therefore, the Project would be consistent with all applicable land use plans and policies. A less than significant impact would result.

Agencies that regulate the filling of wetlands include the USACE and the NCRWQCB. Since the proposed Project would affect USACE and NCRWQCB jurisdictional wetlands, the County has obtained the necessary permit(s) to comply with respective regulations including a CWA Section 404, and Section 401 Water Quality Certification. By implementing permit requirements and mitigation measures identified in the Section 4.4 – Biological Resources above, the Project would not conflict with any applicable federal and State wetland regulations. Additionally, the proposed Project 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.

4.12 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? (Less Than Significant)

The Project would require minor use of rock, gravel, sand, and other similar materials, but is not expected to have any significant impact on locally available minerals or mineral resources valuable to the region or the State. Additionally, the Project Area is also not designated by the Humboldt County General Plan or other local land use plans as having locally important mineral resources within the Project Area (Humboldt County 2017). The impact would be less than significant.

4.13 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

Current noise conditions on and near the Project Area consist of traffic along State Route 255, as well as the adjacent local roadways along the proposed alignment. There are sensitive receptors within 30 feet of the Project Area, which are residential homes. The nearest school, Redwood Coast Montessori, is directly adjacent to the Project where a rain garden would be implemented. Additional industrial and commercial land uses are located in Samoa, approximately two miles south of the Project Area.

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 proposed Project is located within the jurisdiction of the Humboldt Bay Area Plan. However, the Humboldt Bay Area Plan does not provide noise thresholds. Therefore, the Humboldt County General Plan noise policies are applied to noise-related impact analysis.

Construction

Construction of the Project would result in a temporary noise increase associated with the use of construction equipment for the Project for a single construction season, commencing in the summer of 2024, concluding by approximately December 2024. 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. Construction activities would be limited to daytime work hours between 7:00 a.m. to 7:00 p.m., Monday through Friday with occasional work on Saturdays. Furthermore, Humboldt County has not established construction-related noise standards. As the construction phase would be temporary and construction activities would be intermittent and limited to between 7:00 a.m. and 7:00 p.m., potential noise impacts generated during the construction phase would be less than significant.

Operation

The Humboldt County General Plan includes Standard N-S1, which specifies that the Land Use/Noise Compatibility Standards (Table 4.13-1 below) shall be used as a guide to ensure compatibility of land uses. Development may occur in areas identified as “normally unacceptable” if mitigation measures can reduce indoor noise levels to “Maximum Interior Noise Levels” and outdoor noise levels to the maximum “Normally Acceptable” value for the given Land Use Category.

For measuring noise levels and setting noise standards, the County uses Table 13-C (Table 4.13-1 below) of the Humboldt County General Plan, which stipulates that 60 Community Noise Equivalent Level (CNEL) is the upper acceptable limit for residential units (outside measurement), and 85 CNEL is the upper acceptable limit for “public ROW” land uses. CNEL is a measure that describes the average noise exposure over a period of time.

Table 4.13-1 Humboldt County Land Use Noise Compatibility Standards

Land Use Category	Maximum Interior Noise Level	Clearly Acceptable Noise Standard (CNEL)	Normally Acceptable Noise Level (CNEL)	Normally Unacceptable Noise Level (CNEL)	Clearly Unacceptable Noise Level (CNEL)
Residential Single Family, Duplex, Mobile Homes	45	50-55	56-60	61-75	76+
Residential Multiple Family, Dormitories, Etc.	45	50-55	56-60	61-75	76+
Transient Lodging	45	50-65	66-70	71-80	81+
School Classrooms, Libraries, Churches	45	50-60	61-65	66-75	76+
Hospitals, Nursing Homes	45	50-60	61-65	66-75	76+
Auditoriums, Concert Halls, Music Shells	35	-	50-60	61-70	71+
Sports Arenas, Outdoor Spectator Sports	-	50-60	61-65	66-75	76+
Playgrounds, Neighborhood Parks	-	50-55	56-65	66-75	76+
Golf Courses, Riding Stables, Water Rec., Cemeteries	-	50-60	61-70	71-80	80+
Office Buildings, Personal Business & Professional	50	50-65	66-75	76-80	81+
Commercial: Retail, Movie Theaters, Restaurants	50	50-65	66-75	76-80	81+
Commercial: Wholesale, Some Retail, Ind, Mfg., Util.	-	50-70	71-80	81-85	86+
Manufacturing, Communications (Noise Sensitive)	-	50-55	56-70	71-80	81+
Livestock Farming, Animal Breeding	-	50-60	61-75	76-80	81+
Agriculture (except livestock), Mining, Fishing	-	50-75	76+	-	-
Public Right of Way	-	50-75	76-85	86+	-
Extensive Natural Recreation Areas	-	50-60	61-75	76-85	86+

Source: Humboldt County General Plan 2017

Once the Project is constructed, the Project would not generate a significant amount of noise. Therefore, operation would not result in noise levels exceeding the County’s noise standards for residential units or public ROW land uses. No impact would result.

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

Humboldt County does not establish vibration limits to minimize the potential for cosmetic damage to buildings. However, Caltrans recommends a vibration limit of 0.5 inches/second peak particle velocity (PPV) for buildings structurally sound and designed to modern engineering standards, 0.3 inches/second PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a conservative limit of 0.08 inches/second PPV for ancient buildings or buildings that are documented to be structurally weakened. No known buildings that are documented to be structurally weakened or ancient adjoin the Project Area. Therefore, the 0.5 inches/second PPV limit would apply when considering the potential for groundborne vibration levels to result in a significant vibration impact.

The noise and vibration evaluation assessed typical vibration levels that could be expected from construction equipment at a distance of 25 feet, inclusive of required equipment and methods for all four potential construction options. Project construction activities and equipment such as, concrete trucks, concrete pump trucks, all terrain forklifts, snooper truck, compressors, tracked excavators, backhoes, graders, dump trucks, skid steers, bobcats, and pick-up trucks. Jackhammers, saws, grinders, or similar pieces of equipment may be necessary to support pavement removal may generate substantial vibration in the immediate vicinity.

Table 4.13-2 presents typical vibration levels that could be expected from construction equipment at a distance of 25 feet. High-power or vibratory tools and rolling stock equipment (e.g., tracked vehicles, compactors), may generate substantial vibration in the immediate vicinity. Vibratory rollers typically generate vibration levels of 0.210 inches/second PPV at a distance of 25 feet. Vibration levels are highest close to the source and attenuate with increasing distance. Vibration levels would vary depending on soil conditions, construction methods, and equipment used.

Table 4.13-2 Typical Vibration Levels for Construction Equipment Used During Project Construction (Caltrans 2020)

Equipment	PPV at 25 ft. (in/sec)	Approximate Lv at 25 ft. (VdB)
Vibratory Roller	0.210	94
Large Bulldozer	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

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. Noise impacts from ground borne noise to humans are anticipated to be minor.

Vibration impacts to residences are anticipated to be minor as the closest residences are located at least 30 feet away. A residence at a distance of approximately 25 feet away from a vibratory roller, as shown in Table 4.13-2, would be exposed to vibration levels up to 0.21 inches/second PPV, which is substantially less than the applicable 0.5 inches/second PPV limit for modern construction. Minor vibration adjacent to mechanized equipment and road/trail treatments during construction work would be generated only on a short-term basis. Therefore, groundborne vibration and noise would have a less than significant impact.

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 or maintenance culverts and bioswales 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); therefore, no operational impact would result.

- 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 3.85 miles northwest of Murray Field Airport and approximately 4.5 miles north of the Samoa Field Airport. The Project is not located within an airport land use plan. Therefore, the Project would not expose people residing or working in the Project Area to excessive noise levels. No impact would result.

4.14 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

The 2020 population for the community of Manila was estimated to be 798 people (US Census 2020).

- 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)? (No Impact)**

The Project would not be growth-inducing and would not result in new homes or businesses directly or indirectly. No new roads, extension of utilities, or other infrastructure would be installed or constructed that would indirectly allow for additional residential units or commercial uses to be constructed. Further, the Project does not include any residential units that would directly induce population growth. Maintenance of Project elements is anticipated to be performed by local Manila Community Services District staff. No new employment opportunities would be directly or indirectly induced by implementation of the Project. Therefore, no impact to population growth would result.

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

No housing currently exists within the Project Area; therefore, no people or housing units would be displaced necessitating the construction of replacement housing. No impact would result.

4.15 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
Schools?				X
Parks?				X
Other public facilities?				X

The Project would result in an overall benefit to public services by reducing persistent flooding and drainage problems within the community of Manila.

- 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? (No Impact)**

As discussed in Section 4.13 -- Population and Housing, implementation of the Project would not induce population growth and, therefore, would not require expanded fire or police protection or facilities to maintain acceptable service ratios, response times, or other performance objectives. The Project itself results in an improvement to vegetated bioswales, rain gardens, and culverts. The Project improvements would not result in the need to increase staffing, create new hazardous conditions, or result in a modification to the road system that would restrict access for emergency services. The Project would not necessitate any related new or altered public service facilities. Overall, no impact would occur.

4.16 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

Recreational facilities near the Project Area include the Manila Dunes Recreation Area, Manila Community Park, and the Humboldt Coastal Nature Center.

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? (No Impact)

The Project proposes no new recreational amenity within Humboldt County. The proposed Project elements of vegetated bioswales, rain gardens, and culverts, would not increase use to the Manila Dunes Recreation Area, Manila Community Park, the Humboldt Coastal Nature Center, or other recreational facilities or parks. No impact would result.

b) Include or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (No Impact)

The construction or expansion of recreational facilities would not be required by the Project or included in the Project. There would be no impact.

4.17 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 enhance circulation by addressing persistent flooding in the community of Manila and would maintain and enhance community mobility and circulation.

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

The Project would address persistent flooding within the community of Manila. Construction would result in vehicle trips by construction workers and haul-truck trips for material off-haul and deliveries via State Route 255 from the north and US 101 from the south. Construction-related traffic would be temporary, would vary on a daily basis, and would be distributed over the course of a workday and work week. The number of construction-related vehicles traveling to and from the Project Area would vary on a daily basis.

Temporary lane closures on Young Lane, Peninsula Drive, Mill Street, and Victor Boulevard may be required. Temporary lane closures would follow County requirements and encroachment permit for temporary roadway closures, including signage and public noticing requirements.

Once complete, the proposed Project is not expected to increase vehicle traffic on local streets, as it is primarily a flood control Project. The Project would not conflict with effective circulation system performance or intersection level of service standards. Therefore, a less than significant impact would result.

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

Pursuant to SB 743 and the current CEQA Guidelines, evaluation of a project's potential transportation impact requires consideration of vehicle miles traveled (VMT), which refers to the amount and distance of automobile travel attributable to a project. Projects that reduce or have no impact on VMT are presumed to cause a less than significant transportation impact (OPR 2018). The purpose of the proposed Project is to reduce flooding within the community of Manila and will not result in an increase in vehicle trips following construction. The Project would not add additional motor vehicle capacity to the roadway network and would not lead to additional vehicle travel. There would be no impact.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (No Impact)

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. There would be no impact.

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

Emergency access to the Project Area already exists from SR 255 and auxiliary streets, and would continue to exist under the proposed Project during both construction and operation. Temporary lane closures on Young Lane, Peninsula Drive, Mill Street, and Victor Boulevard may be required. Temporary lane closures would follow County requirements for temporary roadway closures, including signage and public noticing requirements, and ingress and regress would be given to emergency access. A less than significant impact would result. Following construction, all properties along the Project Area would continue to have emergency access. No operational impact on emergency access would result.

4.18 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		

Please see Section 2.4 (Tribal Consultation) for a summary of tribal consultation.

a,b) Cause a substantial adverse change in the significance of a tribal cultural resource? (Less Than Significant Impact with Mitigation)

CEQA requires lead agencies to determine if a proposed 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.

Under Assembly Bill (AB) 52, notification letters were sent to the Wiyot Tribe, Blue Lake Rancheria, and the Bear River Band of the Rohnerville Rancheria on November 2, 2022. The Bear River Band of the Rohnerville Rancheria responded, and consultation began on December 12, 2022. No specific tribal cultural resources were identified within the APE, but the area is known to be culturally sensitive, resulting in a potentially significant impact to tribal cultural resources. A request from the tribe to have a cultural resource monitor on-site during the ground disturbing activities of this Project and is incorporated into Mitigation Measure CR-1. The approach to tribal monitoring was documented as acceptable to both parties via email correspondence December 14, and 30, 2022. The Wiyot Tribe and the Blue Lake Rancheria did not respond within 30 days.

4.19 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 proposed Project does not involve the use or construction of any facilities that would require new water, wastewater, electrical, natural gas, or telecommunications utilities. Existing water lines near the area of disturbance are shown on the construction plans and would be flagged and protected during construction. The Project would be designed to enhance existing drainage patterns and stormwater infiltration. The construction of these improvements has been evaluated throughout this IS/MND. No stormwater drainage improvements beyond these mentioned would be required. A less than significant impact would result.

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. Therefore, the Project would not result in the need for the construction of new water facilities, or the expansion of existing facilities. There would be no impact.

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. 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 Humboldt Waste Management Authority (HWMA). The Project is not expected to generate a significant increase of services for solid waste disposal needs. The proposed shared use pathway would generate limited solid waste during construction and even less waste during operation. Construction solid waste would include the one-time temporary generation of construction waste associated with the proposed development of the shared use pathway. Recyclable construction materials (e.g., scrap metal, wood, concrete, glass) could be shipped to local businesses for reuse, with non-recyclable materials sent to the HWMA transfer station in Eureka or Samoa, California.

The Project may 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 HWMA. HWMA trucks solid waste produced in the County to State licensed landfills located in Anderson, California and Medford, Oregon 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; therefore, a less than significant impact would occur.

4.20 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?				X

The Project Area is not located in or near a State Responsibility Area (SRA) or on lands classified as very high fire severity zones. The Project Area is located approximately five miles from the nearest SRA and approximately 9 miles from lands classified as a very high fire hazard severity zone (Humboldt County 2022e, 2022f).

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

A review of the Humboldt County Emergency Operations Plan (Humboldt County 2015) and the Tsunami Inundation Map for Emergency Planning – County of Humboldt (CGS 2021) indicates that the proposed Project would not impair emergency response activities nor established evacuation routes. The Project would not block or alter any roads or pedestrian ways within the Project Area. A less than significant impact would result.

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)

The Project would be located within the community of Manila in a fairly flat topographical area. Some grassland and other vegetation are present along the Project Area. The vegetated portions could be susceptible to wildfire during Project construction or operation due to accidental ignition. During construction, all hazardous materials and construction equipment would be appropriately used and stored pursuant to all required State and local regulations. During operation, the Project would not house any pollutants within the Project Area that may be released if a wildfire occurred. Furthermore, the Project does not include any structures built for human occupancy. Due to the temporary nature of construction, the minimal amount of pollutants anticipated to be stored during the construction phase, the fact that the Project is located within an area of “moderate” fire risk, and that the Project does not provide any structures to be used for human occupancy, it is not anticipated to exacerbate wildfire risks and thereby expose users to pollutants. A less than significant impact would result.

- 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? (No Impact)**

Development of the drainage elements would not result in a need to expand infrastructure to the Project Area or in the immediate vicinity of the Project. New roads for fire defense, expanded water sources, new power lines, or the development of other utilities would not be required. No impact would result.

- 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? (No Impact)**

The Project Area is located within a low slope area of topography. If a wildfire were to occur, post-fire slope instability would be unlikely. Furthermore, the drainage of the Project Area is not proposed to change as a result of the Project. Therefore, no impact would result.

4.21 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)**

As evaluated in this IS/MND, the Project would not substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory.

Mitigation measures are listed herein to reduce impacts related to air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and tribal cultural resources. With implementation of the required mitigation measures, impacts would be less than significant.

- 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 4.10 (Land Use and Planning), the Project is consistent with the goals and policies of the Humboldt County General Plan and Humboldt Bay Area Plan.

Table 4.21-1 provides a list of past, present, and reasonably foreseeable future projects within and near the Project Area in the communities of Samoa and Manila, 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. Efforts to identify cumulative projects included outreach to the Humboldt County Planning Department, Caltrans, Humboldt County Department of Public Works, Manila Community Services District (CSD), and the Humboldt Bay Harbor, Recreation, and Conservation District. Identified projects are summarized in Table 4.21-1.

Table 4.21-1 Projects Considered for Cumulative Impacts

Project Name and Location	Project Description	Estimated Construction Schedule	Relevancy to the Project's Potential Cumulative Impacts
Manila CSD Recreation Improvement Projects <i>Located near the Project in Manila</i>	Minor grading to enhance the existing community park and recreation facilities in Manila.	Future, year unknown; dependent upon unsecured grant funding.	Applicable. The drainage improvements would be located near the Project and would involve ground disturbance.
Manila CSD Drinking Water Improvement Project <i>Located near the Project in Manila</i>	New, larger water storage tank, pumps, and control house. New water line crossing under SR 255 at Carlson Drive. Ground disturbance limited to existing disturbed areas.	Future, year unknown; dependent upon unsecured grant funding.	Applicable. The water improvements would be located near the Project and would involve ground disturbance.
Manila CSD Wastewater Improvement Project <i>Located near the Project in Manila</i>	Miscellaneous upgrades to the wastewater septic tank effluent pumping system, including pump replacements. Minimal ground disturbance needed.	Future, year unknown; dependent upon unsecured grant funding.	Applicable. The wastewater improvements would be located near the Project and would involve ground disturbance.
Manila Shared Use Pathway Project along Highway 255 <i>Located near the Project in Manila</i>	Paved shared-use pathway adjacent to Highway 255 in Manila extending approximately one mile. See below for more detail.	Completed	No relevance, the project is complete.
Fiber optic off-shore cable landing project <i>Parallel to State Route 255 in Samoa and Manila, CA</i>	An off-shore fiber optic cable would cross the sea floor and land in or near Samoa, CA then travel to a data center in Arcata	Ongoing	No relevance. Within the vicinity of the Project, the fiber is located directly adjacent to SR255.

The three projects proposed by the Manila CSD would also be located within proximity and involve varying levels of grading and/or ground disturbance. All proposed activities would be fully permitted and thus, include standard measures for environmental protection. Improvements to wastewater and recreational facilities would result in benefit to the environmental when combined with the Project by improving biological, hydrology and water quality, and recreational conditions in Manila. Improvements to water and wastewater infrastructure would not be environmentally impactful. All three projects remain pending acquisition of required grant funds. Any potential cumulative adverse impact would remain less than significant.

The impacts associated with the proposed Project analyzed in this IS/MND would not add appreciably to any existing or foreseeable future significant cumulative impact. Incremental impacts, if any, would be negligible and undetectable. Any applicable cumulative impacts to which this Project would contribute 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 shared use pathway 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 contribute to any significant cumulative impacts which may occur in the area in the future. Therefore, the impact would be 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 4 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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Mitigation, Monitoring, and Reporting Program

