CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following document for this project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq] and accompanying Guidelines [Cal. Code Regs., tit. \14, § 15000 et seq].

PROJECT INFORMATION

PROJECT TITLE: Salmon Creek Sandblast Waste Abatement Remedial Action Plan		SITE CODING:
PROJECT ADDRESS: State Route (SR) 1 at post miles 42.9 through 43.6 (Whitesboro Cove)	CITY: Albion	COUNTY: Mendocino
PROJECT SPONSOR: Department of Toxic Substances Control	CONTACT: Dennis Palacios	PHONE: (818) 717-6513
APPROVAL ACTION UNDER CONSIDERATION BY DTSC: Remedial Action Plan		
STATUTORY AUTHORITY: California H&SC, Chap. 6.8		

DTSC PROGRAM/ADDRESS: Site Mitigation and Restoration Program 700 Heinz Avenue, Suite 200C Berkeley, California 94710	CONTACT: Dennis Palacios Project Manager Dennis.palacios@dtsc.ca.gov	PHONE: (818) 717-6513

PROJECT DESCRIPTION:

The Department of Toxic Substances Control (DTSC) is in the process of approving the Salmon Creek Sandblast Waste Abatement Remedial Action Plan (RAP) for remediation of lead-impacted shallow soil in the State right-of-way (ROW) and on the privately-owned parcels located east of the Salmon Creek Bridge.

The Project Site is located near the community of Albion along State Route (SR) 1 at post miles 42.9 through 43.6. Big Salmon Creek flows under the Salmon Creek Bridge out into Whitesboro Cove (refer to Figure 1 and Figure 2).

As described in the RAP, the proposed project would implement the Targeted Removal - Preserve Natural Slopes alternative. This alternative would involve excavation of shallow soil within the State right-of-way (ROW) and portions of Parcels 6 and 8 that have been impacted by lead-containing sandblast waste at concentrations above the regulatory cleanup goals (refer to Figure 3). Details of the excavation activities are provided in Table 1.1 below. Natural slope areas on Parcels 6 and 8 with statistically lower contaminant levels would not be excavated based on a human health risk evaluation. The calculated time weighted average exposure point concentration (TWA EPCs) for Parcels 6 and 8 with the natural slope areas remaining intact were 50 and 64 milligrams per kilogram (mg/kg), respectively, below the residential cleanup goal of 89 mg/kg.

The Targeted Removal - Preserve Natural Slopes alternative would require removal of vegetation within the limits of the remedial excavations. Following the completed remedial excavations based on the results of confirmation soil sampling and analytical testing, the remedial excavations other than steeper natural slopes would be backfilled with clean imported soil. The completed excavation and backfilled areas would also require revegetation, sensitive community restoration, and monitoring for a period of time defined by the regulatory permit requirements. The amounts of soil excavation and required haul truck trips associated with the Targeted Removal - Preserve Natural Slopes alternative are shown in Table 1.1 below.

TABLE 1.1
EXCAVATION ACTIVITIES

Excavation Area	147,162 square feet
Contaminated Soil Volume	6,918 cubic yards
Disposal Truck Trips	478
Clean Fill Areas	112,209 square feet
Clean Fill Volume	5,168 cubic yards
Import Fill Truck Trips	357
Total Truck Trips	835
Working Days	41

Note: Portions of steeper natural slopes and exposed bedrock areas would not be backfilled.

Trucks would access the Project Site via SR1 and Spring Grove Road, which is a partially paved roadway that dead ends at the Project Site. Trucks would transport contaminated soil to either the Kettleman Hills or Clean Harbors Buttonwillow landfill.

BACKGROUND:

The Project Site was previously occupied by the town of Whitesboro that was established in the 1870s as a railhead and wharf for loading cut lumber. Review of Caltrans' maintenance records for the Salmon Creek Bridge indicates that "Red Lead" and "Zinc Rich" paint was utilized in the 1950s and 1960s. Historical bridge paint sandblasting operations (paint removal/preparation using sandblast media) did not include containment measures thereby resulting in contamination of soils beneath the bridge. Since 1999, bridge painting operations have included 100% containment. The purpose of the project is to remediate lead-impacted shallow soil in the State ROW and on the privately-owned parcels east of the Salmon Creek Bridge.

Several inspections and investigations of the Project Site have been conducted recently. Initial environmental site characterization was performed within State ROW at the Project Site in 2015 as discussed in the Preliminary Site Investigation Report (PSI) dated January 12, 2015. Elevated lead levels were encountered in shallow soil and groundwater beneath the bridge structure. Based on these findings, Caltrans entered into regulatory oversight agreements with DTSC.

A 2017 Preliminary Endangerment Assessment (PEA) was performed to evaluate the extent of sandblast waste related impacts within the State ROW and Private Parcels that allowed right-of-entry access. The results of the PEA indicated that lead is the primary contaminant of concern at the Project Site. The results of the human health screening risk evaluation indicated that potential exposure to lead in shallow soil generally beneath and easterly of the bridge structure may result in adverse health effects to Caltrans' maintenance workers within the State ROW and residents within the Private Parcels. Based on lead and zinc concentrations below conservative regulatory screening levels (SLs), no significant sandblast waste related impacts were reported in Salmon Creek sediment or porewater samples and, therefore, no significant ecological risk was identified at the Project Site. Elevated dissolved lead concentrations identified in groundwater beneath and immediately east of the existing bridge may pose a health risk if shallow groundwater from these locations is to be used as a source of drinking water. However, groundwater is unlikely to be used as drinking water based on proximity to the Pacific Ocean and brackish conditions. Water samples collected from domestic water sources at and near the Project Site including a culvert outfall, a domestic well, and a spring box did not contain lead or zinc at concentrations above the laboratory reporting limits (RLs).

A 2019 Supplemental Site Investigation (SSI) was performed to further evaluate the vertical and horizontal extent of sandblast waste related impacts within the State ROW and Private Parcels. Borings for the SSI were completed within the Project Site on a grid pattern and data corroborated the PSI and PEA sample results with the extent of elevated lead in soil concentrations exceeding lead SLs generally beneath and easterly of the bridge structure. Related elevated zinc concentrations in shallow soil did not exceed SLs and therefore do not represent a human health concern.

Additional assessment was performed at the Project Site in 2020 as reported in the 2021 Addendum to Supplemental Site Investigation Report (Addendum SSI). This work was performed to evaluate surface soil and further evaluate shallow lead-impacted soil in natural slope areas that were previously inaccessible due to dense brush, steep terrain and no brush removal regulatory restrictions. Elevated lead concentrations exceeding the residential SL were reported for surface soil samples collected beneath the Residence and within the natural slope areas nearest to the bridge with generally decreasing lead concentrations with depth and distance easterly from the bridge.

The Addendum SSI presented updated human health exposure assessments for each of the identified exposure units including State ROW North and South, Spring Grove Road, and each of the Private Parcels within the project site. The results of the human health exposure assessment determined that no further action is recommended for Parcels 1, 2 and 7 and Spring Grove Road because the calculated 95% upper confidence limit (UCL) lead concentrations were below the

SLs. Based on the time weighted average (TWA) exposure point concentrations (EPCs) calculated for identified exposure subunits within Parcels 6 and 8, no further action was recommended for significant portions of the natural slope and terrace (wetland) areas on Parcels 6 and 8. This recommendation was based on assumed resident time of use within the parcels and calculated statistical lead concentrations less than the residential SL. Lead-impacted shallow soil within portions of the State ROW north and south of Salmon Creek, and portions of Parcels 6 and 8 with elevated lead concentrations greater than the SLs will require further action.

The 2021 Aerially Deposited Lead Site Investigation (ADL SI) was performed to evaluate potential elevated lead concentrations in shallow soil within Spring Grove Road (Mendocino County ROW) extending from the project site to SR 1. Elevated lead concentrations associated with sandblast waste were reported for shallow soil samples collected immediately east of the bridge structure.

Geosyntec completed a technical memorandum entitled Ecological Risk-Based Threshold Concentrations for Lead in Soil dated March 4, 2020, to present ecological risk assessment exposure parameters and calculations for the project site. The results of the ecological risk assessment indicated that cleanup goals for lead-impacted soil based on human health exposure are more than adequate to protect potential wildlife receptors.

The Feasibility Study (FS) process selected the most appropriate alternative through an evaluation against nine qualifying criteria. A Draft FS and Final Draft FS were submitted to the DTSC for review and comment. The Final Draft FS was revised to address comments provided by DTSC. The Final FS dated May 25, 2022, was approved by the DTSC in writing dated June 22, 2022. The purpose of the FS was to present Removal Action Objectives (RAOs), general response actions (GRAs), and process options; develop and screen remedial alternatives; and present an individual and comparative analysis of each retained alternative for final remediation of lead-impacted shallow soil at the project site.

PROJECT ACTIVITIES:

Remediation activities associated with the Project would involve excavation of lead-impacted shallow soil within the State ROW to statistically-based concentrations below the regulatory commercial/industrial land use cleanup goal (320 milligrams per kilogram (mg/kg) plus background concentration (9 mg/kg)). Remedial excavations on private parcels east of the State ROW would be performed to reduce lead concentrations below the regulatory residential land use cleanup goal (80 mg/kg plus background concentration). Removal of vegetation would be necessary prior to removal of lead-impacted shallow soils; however, the targeted removal would preserve vegetation on steep, difficult to access slopes. Excavation depths would vary from 0.5 feet to 1.5 feet and lateral extents would be based on the results of the previous site investigations. In situ testing and screening during excavation would be used to verify soils left in place meet the cleanup goals. Excavated materials would be shuttled to an onsite staging area and temporarily stockpiled. The stockpiles would have a liner underneath and would be covered when not in use.

Areas where lead-impacted soils are removed would be restored by placement and contouring of imported borrow material, amendment of soils as needed, erosion control, revegetation, and wetland restoration. Approximately 6,918 cubic yards (cy) of lead impacted soil would be excavated from the site and replaced with 5,168 cy of fill. Revegetation would include methods such as hydroseeding, utilizing local cuttings and duff, and installation of new plants. Where excavation occurs on existing slope faces steeper than 2:1 (horizontal to vertical), fill would not be placed due to potential erosion and surface sloughing issues during the wet season. The excavated slope faces would be restored by using a combination of different erosion control measures such as compost, duff, native sod mats, live cuttings, coir netting, and micro-stepping. Additional fill would be used to raise the grade of the driveway where feasible to increase resilience to sea level rise and storm surge.

Staging areas would be selected after project approval and during the permitting phase but are anticipated to include the following areas:

- Peters parcel (APN 123-330-02),
- Northern portion of the Hughes parcel (APN 123-330-09) south of the intersection of Spring Grove Road and SR-1,
- Portion of Hughes parcel east of Spring Grove Road,
- Westerly portion of the Funke parcel (APN 123-360-07), and/or
- end of the paved section of Spring Grove Road, within Mendocino County ROW, under an encroachment permit.

If staging area option 1 (Peters parcel) is selected, a temporary access opening may be constructed at the northeast corner of the parcel to provide ingress and egress from SR 1 under traffic control. This access would be removed at the completion of the project and the area restored to its pre-construction condition.

Access to the north side of Salmon Creek would be provided from Spring Grove Road, a partially paved roadway that dead ends at the Project Site. A short stretch of the road near the intersection with SR 1 would be widened to 22 feet. The remaining paved portion of Spring Grove Road, between SR 1 and the edge of the Salmon Creek bluff, would be repaired and overlaid with asphalt. The downslope portion of Spring Grove Road, from the edge of the bluff to the project area, is a single lane, unpaved road. This segment would be widened to accommodate a California Legal truck and trailer by excavating into the uphill side and paved with asphalt for improved traction.

Existing fencing along the south edge of the unpaved portion of Spring Grove Road and beneath the bridge would be removed to allow room for equipment to work safely. A guardrail element wall supporting a section of Spring Grove Road would be evaluated and may require additional stabilization. The hairpin turn at the end of Spring Grove Road and the private driveway would be widened and a truck turnaround constructed.

At the completion of construction, sections of pavement on Spring Grove Road may require rehabilitation due to impacts from construction traffic. The County would require the road to be restored to its pre-project condition or better, which would likely involve asphalt overlay and restriping.

On the south side of Salmon Creek, an existing access road near the southeast corner of the bridge would be realigned, widened, and paved with asphalt for construction access. A landing would be graded at the east end of the access road for equipment turnaround, loading and staging. It would also be necessary to build a temporary access at the southwest corner of the bridge for soil removal and restoration work west of the bridge.

Composite samples taken from the stockpiled lead-impacted soil would be tested to characterize the material and determine the disposal strategy. It is expected the lead contaminated soil would be transported in covered trailers to California-licensed Class I or II landfill facilities based on landfill acceptance criteria.

Activities associated with the Remedial Action Plan would occur over an approximately 4-month period.

PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED:

While DTSC approves the overall remedy for the Site, other public agencies may be involved through permitting or consultation such as the State Water Resources Control Board, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Army Corps of Engineers, Coastal Commission, North Coast Regional Water Quality Control Board, and Mendocino County.

NATIVE AMERICAN CONSULTATION:

DTSC complied with the 2014 Assembly Bill 52 (AB52). DTSC provided written notification to seven tribes on the Tribal Consultation List from the Native American Heritage Commission (NAHC) regarding the Proposed Project on September 29, 2023. The notice included a brief project description, project location, and lead agency's contact information. DTSC received interest from none of the Tribal governments contacted and, therefore, did not consult with any Tribe prior to release of this CEQA document for the Proposed Project. Tribal cultural resources are those cultural resources identified as such through consultation under AB52 with a tribe. Cultural resources have been identified within the project footprint; however, none of these have been identified by a tribe as tribal cultural resource. A tribe under the provisions of AB52 may later determine that a previously located cultural resource is a tribal cultural resource. If a previously undiscovered cultural resource is located during construction and a tribe determined it is a tribal cultural resource, the Post Review Discovery Plan for the project would be implemented to address this new discovery. The Post Review Discovery Plan states if tribal cultural resources are discovered during construction activities, then work would stop in that area until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate response measures in consultation with DTSC and other agencies, and Native American representatives, as appropriate. Please refer to the Tribal Cultural Resources analysis (Section 18) for additional information. It is noted that Caltrans initiated consultation with the Sherwood Valley Rancheria of Pomo in September 2020 and consultation is still ongoing.

REFERENCES USED:

Department of Toxic Substances Control (DTSC), 2023. *Draft Remedial Action Plan, Salmon Creek Sandblast Waste Abatement Project*. Prepared by Geocon. July 2023.

Figure 1
Regional Location

Figure 2
Project Location

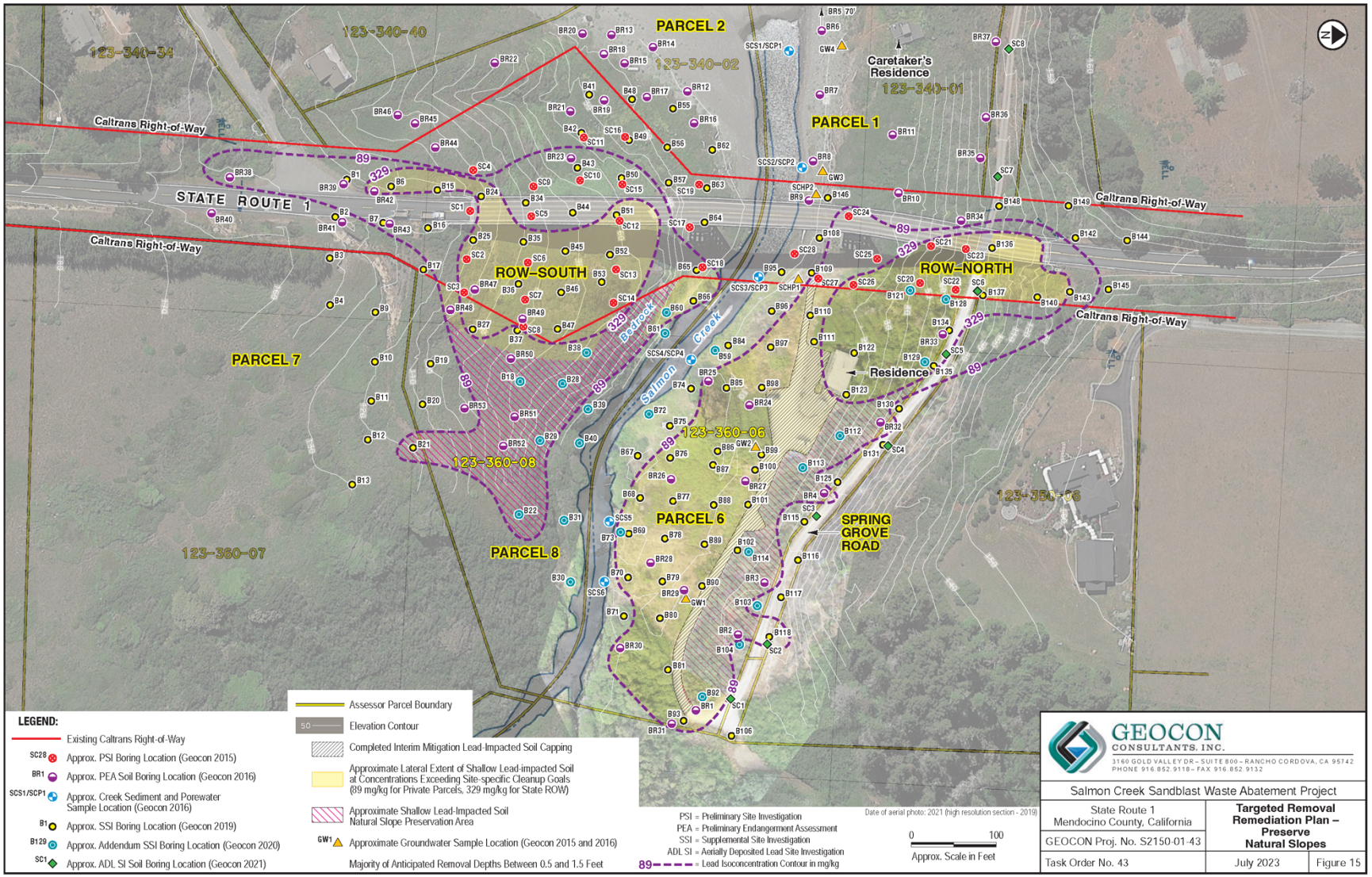

Figure 3
Targeted Removal Areas

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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 beginning on page 11. Please see the checklist beginning on page 11 for additional information.

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

SUMMARY OF MITIGATION

DTSC has determined mitigation measures would not be required beyond those incorporated as part of the Proposed Project to ensure that impacts would be less than significant.

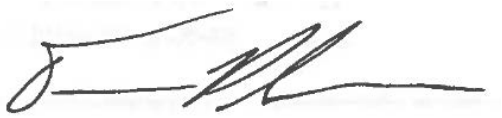
DETERMINATION

On the basis of this initial evaluation:

☒	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☐	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

CERTIFICATION

I hereby certify that the statements furnished above and in the attached documentation, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

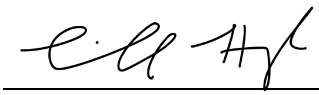


Preparer's Signature

February 20, 2024

Date

Dennis Palacios	Project Manager	(510) 540-2432
Preparer's Name	Preparer's Title	Phone #



Branch Chief Signature

February 27, 2024
Date

Marikka Hughes	Environmental Program Manager I	(510) 540-3926
Branch Chief Name	Branch Chief Title	Phone #

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. «Potentially Significant Impact» is appropriate if there is substantial evidence that an effect may be significant. If there are one or more «Potentially Significant Impact» entries when the determination is made, an EIR is required.

4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(3)(D)). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS				
Except as provided in Public Resources Code Section 21099, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

California Scenic Highway Program

The Scenic Highway Program allows county and city governments to apply to the California Department of Transportation (Caltrans) to establish a scenic corridor protection program which was created by the Legislature in 1963. Its purpose is to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment.

Mendocino County General Plan

The Mendocino County General Plan Coastal Element contains policies that protect the visual and scenic qualities along Highway in rural areas. The scenic and visual qualities of Mendocino County coastal areas are considered and protected as a resource of public importance.

ENVIRONMENTAL SETTING (BASELINE):

The project site is located in Mendocino County, California, near the community of Albion. The Project Site is located along State Route (SR) 1 at post miles 42.9 through 43.6. The Big Salmon Creek flows under the Salmon Creek Bridge out into Whitesboro Cove. Habitat within the project site limits of work is primarily undeveloped and contains an abundance of vegetation. The areas surrounding the Project Site include Salmon Creek and rural residences.

The project is also located in the Coastal Zone and is considered a sensitive corridor in regard to visual and scenic resources. There are unobstructed views of the ocean from the project site and seascape views are considered a scenic resource. The landscape types in the project area include coastal bluffs, coastal prairie, and coastal rural residential. Little Salmon Creek and Big Salmon Creek meet within the viewshed east of the bridge, then leads out as Salmon Creek to Whitesboro Cove, west of the bridge. Whitesboro Cove is surrounded by high bluffs and rocky outcrop and has a beach area adjacent to the mouth of the creek.

On the north side of Salmon Creek, Spring Grove Road intersects SR 1 and travels southward near the bluffs, transitioning to a narrow one-lane dirt road as the road turns east and hugs the hillside as it descends. Salmon Point, including the Pacific Reefs gated community, is located southwest of the bridge and forms the southern boundary of the Whitesboro Cove.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The significance determination in this visual analysis is based on consideration of: (1) the extent of change related to visibility of the Project Site from key public vantage points; (2) the degree of visual contrast and compatibility in scale and character between project activities and the existing surroundings; (3) conformance of the proposed project with public policies regarding visual and urban design quality; and (4) potential adverse effects on scenic vistas and scenic resources.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

A visual impact assessment was prepared to identify the visual character and visual quality in the project area. The methodology employed for assessing a visual resource change by evaluating the visual character and the visual quality of the visual resources that comprise the project area before and after the construction of the proposed project. Potential aesthetic impacts involved considering the existing viewshed and the project activities that have the potential to change the project-area visual character.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect on a scenic vista?

Impact Analysis:

The proposed project would involve excavating approximately 7,000 cubic yards (cy) of lead impacted soil from the site and replacing with 6,500 cy of fill that would be sourced from access road excavations and excess material identified by the project contractor. Project activities would also involve revegetation such as hydroseeding, utilizing local cuttings and duff, and installation of new plants. Although the project site is located along to SR 1, of which adjacent areas are considered a scenic vista (e.g., views of the Pacific Ocean), remediation activities would occur in areas below SR 1 (under Salmon Creek bridge) and not readily visible to drivers along SR 1. No new aboveground structures or modifications to existing structures would occur with implementation of the proposed project. Soil excavation and replacement activities would not impact scenic views of the surrounding area.

Conclusion:

Components of the proposed corrective measures and the short-term construction activities would not have the potential to substantially affect the view of any scenic vista. Therefore, there would be a less-than-significant impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact Analysis:

State Route 1 through the project site is listed on the Caltrans California Scenic Highway Mapping System as an "Eligible State Scenic Highway", but it has not been officially designated as such. There are no other sections of California State Scenic Highway located within view of the Project Site. Although the project site is located along SR 1, of which adjacent areas are considered a scenic vista (e.g., views of the Pacific Ocean), remediation activities would occur in areas below SR 1 (under Salmon Creek bridge). The most noticeable component of the proposed project would involve the widening of Spring Grove Road. Specifically, the widening of the dirt road as it descends would create several permanent changes in the visual landscape from new asphalt pavement, which would increase the hard surface, and widening from 8 feet to 12 feet to accommodate construction vehicles. Northbound travelers on SR 1 would briefly see the location and slope of the widened and paved Spring Grove Road. However, the visual impact of the new road width and material would be negligible. Lastly, after excavation activities and backfilling complete, project site soils would be hydroseeded with native seeds and revegetated with native plant material which are found in the project area.

The period of time when the plants are growing toward maturity would be considered a short-term impact and would occur under Salmon Creek bridge and below SR 1, thereby not readily visible to drivers along SR 1. Soil excavation and replacement activities would not substantially damage scenic resources within view of state scenic highway.

Conclusion:

Scenic resources (e.g., trees, rock outcroppings, historic buildings) would not be disturbed or damaged through implementation of proposed soil excavation and replacement activities. Implementation of the proposed project would not result in any impacts to scenic resources.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

Publicly accessible vantage points of the Project Site are located along Spring Grove Road and SR 1 at the Salmon Creek bridge. Soil excavation and replacement activities would temporarily alter the existing visual character and quality of the site and surrounding area. Existing vegetation would require removal to excavate and replace contaminated soils. However, project activities would also involve revegetation such as hydroseeding, utilizing local cuttings and duff, and installation of new plants.

The site is considered to be located in a rural area that is regulated by Mendocino County. After completion of the remediation activities, including excavation and revegetation, there would not be any discernable change in views from SR 1 of the project area. Specifically, remediation activities would occur in areas below SR 1 (under Salmon Creek bridge) and not readily visible to drivers along SR 1. Drivers along SR 1 would view the project site for approximately 10 to 12 seconds and would not have the ability to recognize a change in visual character along SR 1. In addition, revegetation activities would over time place the project site back into a substantially similar visual state before soil excavation and replacement activities occurred. It is noted that, however, approximately 10 to 20 years would be required for the revegetation activities to fully restore site conditions. Therefore, the soil excavation and replacement activities would not result in a discernable, substantial degradation of the existing visual character or quality of public views of the site and its surroundings.

Conclusion:

After completion of remediation activities, including revegetation, the proposed project would not substantially degrade the existing visual character or quality of public views of the site. Therefore, impacts to the existing visual character of the site would be considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Impact Analysis:

The proposed project activities would be conducted during daytime hours with the potential for some work to occur after sunset. However, the proposed project would not be anticipated to require any night-shift or swing-shift work. The nearest sensitive receptor (i.e., residences) is located approximately 100 feet north of the project site. It is noted that a vacation home is located in the remediation area; however, the owner does not plan to use their home during construction activities. Any nighttime lighting used during construction activities

would be occasional and limited to a relatively small work area and would not introduce any new temporary or permanent sources of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Conclusion:

Project activities would not require nor introduce a new temporary or permanent source of substantial light or glare that would adversely affect views in the project area. Therefore, implementation of the proposed soil excavation and replacement activities would result in no impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Department of Transportation. 2023. *California State Scenic Highway System Map*. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (Accessed July 5, 2023)

2. AGRICULTURE AND FORESTRY RESOURCES				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting agriculture or forestry resources are applicable to the Project Site.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is not located in or near any agricultural or forestry resources. The Project Site has always been vacant and open space.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of agriculture or forestry resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of agricultural or forestry resources on or near the Project Site, no environmental studies relating to agriculture or forestry resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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?

Impact Analysis:

The closest designated Farmland is located over one mile east of the Project Site. Project-related activities would remain within the Project Site boundaries. Therefore, no impact to designated Farmland would occur.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Impact Analysis:

The Project Site is designated as grazing land by the California Department of Conservation, Division of Land Resource Protection. Approximately 112 acres of non-prime agricultural land located to the south of the Project Site is enrolled in a Williamson Act contract but does not meet any criteria for classification as prime agricultural land (DLRP, 2023).

The soil excavation and replacement activities would disturb areas enrolled in a Williamson Act contract but would not disturb any area of active agricultural use. In addition, the proposed revegetation activities would place the project site back into a substantially similar vegetative state before soil excavation and replacement activities occurred. Therefore, project-related activities would not conflict with the overall purpose of Williamson Act contract to preserve agricultural and other open space lands. Therefore, impacts to the existing zoning for agriculture or Williamson Act contract would be considered less than significant.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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))?

Impact Analysis:

There is no land with existing zoning of forest land or timberland within the Project Site. Proposed project-related activities would not conflict with existing zoning or cause rezoning of forest land or timberland, as none exists within the Project Site boundaries. Therefore, there would be no impact to forest land or timberland.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

d. Result in the loss of forest land or conversion of forest land to non-forest use?

Impact Analysis:

There are no forests or timberland on or near the Project Site and the proposed project would not convert any land to forest or timberland. Therefore, there would be no impact.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

The closest designated Farmland is located over one mile east of the Project Site. The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or agricultural land. Therefore, there would be no impact.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Department of Conservation, Division of Land Resource Protection (DLRP). 2023. DOC Maps: Division of Land Resource Protection. https://maps.conservation.ca.gov/dlrp/ (Accessed July 5, 2023)

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

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The Project Site is located within the jurisdiction of the Mendocino County Air Quality Management District (MCAQMD). The role of the MCAQMD is to achieve clean air to protect public health and the environment. The MCAQMD's primary responsibility is to attain and maintain the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standard (CAAQS) in the North Coast air basin by regulating air pollution emissions from stationary and mobile sources. These responsibilities are met by adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, and inspecting stationary sources of air pollutants. The MCAQMD does not have any rules or regulations related to the criteria pollutant thresholds generated by the proposed project activities. Therefore, MCAQMD recommends using the Bay Area Air Quality Management District (BAAQMD) standards and MCAQMD rules for thresholds of significance for the air quality analysis. In this section, air quality is evaluated against numbers set forth in the BAAQMD thresholds of significance.

ENVIRONMENTAL SETTING (BASELINE):

Air quality is defined by the concentration of pollutants related to human health. Ambient concentrations of air pollutants are determined by the rate and location of pollutant emissions from pollution sources, and the regional or local atmosphere's ability to transport and disperse pollutant emissions. Natural factors that affect pollutant transport and dispersion include terrain, wind, atmospheric stability, and sunlight. Therefore, ambient air quality conditions within the local air basin are influenced by such natural factors as topography, meteorology, and climate, in addition to the amount of air pollutant emissions released by existing air pollutant sources.

The project site is located in Mendocino County along the coastline. The surrounding region is characterized by the Pacific Ocean and coastal mountains. Mendocino County is located in the North Coast Air Basin (NCAB). In the NCAB, air quality is predominantly influenced by the climatic regimes of the Pacific. In summer, warm ground surfaces draw cool air in from the coast, creating frequent thick fogs along the coast and making northwesterly winds common. In winter, precipitation is high, surface wind directions are highly variable, and weather is more affected by oceanic storm patterns.

As a result of the region's topography and coastal air movements, inversion conditions are common in the NCAB. Inversions are created when warm air traps cool air near the ground surface and prevents vertical dispersion of air. Valleys, geographic basins, and coastal areas surrounded by higher elevations are the most common locations for inversions to occur. During the summer, inversions are less prominent, and vertical dispersion of the air is good. However, during the cooler months between late fall and early spring, inversions last longer and

are more geographically extensive; vertical dispersion is poor, and pollution may be trapped near the ground for several concurrent days.

Mendocino County is categorized as an attainment/unclassified area for all current NAAQS.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The BAAQMD Thresholds of Significance for average annual air emissions are shown in Table 3.1 below. If project-related average annual emissions are below these thresholds, the impacts are considered less than significant.

TABLE 3.1

BAY AREA AIR QUALITY MANAGEMENT DISTRICT THRESHOLDS OF SIGNIFICANCE FOR CONSTRUCTION-RELATED CRITERIA AIR POLLUTANTS AND PRECURSORS

Criteria Pollutant or Precursor	Threshold of Significance (pounds/day)
ROG	54
NOx	54
CO	None
PM_{10}	82
$PM_{2.5}$	54
PM_{10} / $PM_{2.5}$ (fugitive dust)	Best management practices

ROG = reactive organic gases
NOx = nitrogen oxide
CO = carbon monoxide
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

California Emissions Estimator Model ® (CalEEMod, Version 2022.1.1.16) was run to determine if project-related air emissions exceed BAAQMD Thresholds of Significance. The CalEEMod results are summarized in Table B-1, and the model basis information is summarized in Table B-2 and B-3 (refer to Attachment A). Complete CalEEMod Input and Output is provided in Attachment A. The following construction equipment was considered in modeling air emissions:

- On-road trucks (worker transportation),
- Loaders,
- Rubber tire dozer,
- Excavators,
- Grader,
- Backhoes, and
- Generator.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Conflict with or obstruct implementation of the applicable air quality plan?

Impact Analysis:

During construction, short-term degradation of air quality may occur due to the release of particulate emissions (airborne dust) generated by excavation, grading, hauling, and other construction-related activities. Emissions from construction equipment also would be expected and would include carbon monoxide (CO), nitrogen oxides (NOx), volatile organic compounds (VOCs), directly-emitted particulate matter (PM_{10} and $PM_{2.5}$), and toxic air contaminants such as diesel exhaust particulate matter. Construction activities would be expected to increase traffic congestion in the area, resulting in increases in emissions from traffic during the delays. These emissions would be temporary and limited to the immediate area surrounding the construction site.

Fugitive dust would be generated during grading and construction operations. Sources of fugitive dust include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly

controlled, vehicles leaving the site may deposit mud on local streets, which could be an additional source of airborne dust after it dries. Fugitive dust emissions may vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. Fugitive dust emissions also depend on soil moisture, silt content of soil, wind speed, and the amount of equipment operating. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Construction-related activities would result in emissions of ozone precursors (NO_x and reactive organic gases (ROG)), particulates (PM_{10} and $PM_{2.5}$), air toxics, and greenhouse gases (project-related greenhouse gas emissions are analyzed separately in Section 8 of this Initial Study/Negative Declaration). Emissions for construction activities associated with implementing the proposed cleanup action were performed using the California Emissions Estimator Model ® (CalEEMod, Version 2022.1.1.16) and the results are shown in Table 3.2 below. The CalEEMod Input and Output model results are provided in Attachment A.

TABLE 3.2

THRESHOLDS OF SIGNIFICANCE FOR CONSTRUCTION-RELATED CRITERIA AIR POLLUTANTS AND PRECURSORS

Criteria Pollutant or Precursor	BAAQMD Average Annual Emissions Threshold of Significance (tons/year)	BAAQMD Thresholds of Significance Converted to Pounds Per Day	Estimated Unmitigated Proposed Project Maximum Daily Emissions (pounds/day)	Is Threshold of Significance Exceeded?
ROG	10	54	0.1	NO
NOx	10	54	0.7	NO
CO	none	-	0.8	NO
PM_{10}	15	82	3.0	NO
$PM_{2.5}$	10	54	0.4	NO

Notes:
NOx = nitrogen oxide
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
ROG = reactive organic gases

As shown in Table 3.2, project-related construction activities would generate air emissions below BAAQMD Thresholds of Significance for construction impacts.

The proposed project would also require the preparation and implementation of a Dust Control Plan to ensure the construction activities would comply with the MCAQMD Rule 1 requirements for fugitive and visible dust emissions. Specifically, the proposed project would include visual and real time air monitoring to ensure adequate dust control methods and no generation of visible dust or fugitive dust emissions exceeding regulatory human health-based thresholds and the use of water trucks.

Conclusion:

The CalEEMod results indicate that the project-related emissions would be below the BAAQMD thresholds for construction projects. The short-term construction activities of the proposed project and implementation of appropriate and feasible control strategies (e.g., dust control plan, water trucks) would not conflict with or obstruct implementation of any Clean Air Plan of the MCAQMD or AAQMD. Therefore, project impacts are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Impact Analysis:

As mentioned previously, the Project Site is in attainment for ozone, PM_{10}, and $PM_{2.5}$. As shown in Table 3.2 above, the proposed project-related emissions of these pollutants would not exceed any of the thresholds of significance established in the BAAQMD thresholds of significance.

Conclusion:

Construction activities associated with implementing the proposed project would generate emissions of pollutants that are below the BAAQMD thresholds of significance and MCCAQMD is in attainment for federal ambient air quality standards. Therefore, implementation of the proposed project would not result in any impact to the net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

c. Expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis:

The California Air Resources Board (CARB) defines sensitive receptors as children, elderly, asthmatics, or others who are at a heightened risk of negative health outcomes due to exposure to air pollution. For the purposes of this analysis, the locations where these populations can typically congregate (e.g., schools, hospitals) are considered sensitive receptor locations. Construction activities associated with implementing the proposed project would take place near sensitive receptors including residences located approximately 100 feet to the north of the Project Site. It is noted that a vacation home is located in the remediation area; however, the owner does not plan to use their home during construction activities. Therefore, the vacation home is not considered a primary residence where people would not have the opportunity to reside elsewhere during the increased noise levels. The proposed project activities are not expected to expose these sensitive receptors to substantial pollutant concentrations for the following reasons:

- The proposed project would be a temporary construction project lasting approximately three months,
- The proposed project activities would occur during business days and hours, limiting impact to citizens in nearby residences while they are at work, and
- Best management practices would be used to reduce fugitive dust and equipment emissions, such as the use of water trucks.

Conclusion:

Even though residents are located close to the Project Site (within 50 feet), there would be less-than-significant impact based on the nature of the work to be performed, short duration of activities, and implementation of dust suppression (e.g., water trucks).

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

Implementation of proposed cleanup activities have the potential to generate odors during the operation of construction equipment, such as those experienced from diesel engine exhaust. The closest receptor of odors are residences located approximately 50 feet to the north of the Project Site. This distance is considered sufficient to eliminate the ability for a resident to discern an odor originating from the Project Site (i.e., diesel exhaust fumes) from the overall air space. In addition, the proposed project activities are not expected to expose these sensitive receptors to substantial odor concentrations because the proposed project would be temporary construction project impact for approximately three months and the proposed project activities would occur during business days and hours, limiting impact to citizens in nearby residences while they are at work.

Conclusion:

Project-related odors during construction activities would be minimally discernable by the closest receptors (i.e., residences) because of the distance between them and the Project Site and proposed project would be temporary construction activities. Therefore, implementation of the remediation activities would not result in other emissions that could adversely affect a substantial number of people.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

Bay Area Air Quality Management District (BAAQMD), 2023. *CEQA Thresholds and Guidelines Update*. Available at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines (Accessed July 9, 2023).

4. BIOLOGICAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries?	☐	☐	☒	☐
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Special status habitats, plant and animal species have varying degrees of legal protection under various federal, state, and local laws and regulations. The federal regulatory requirements and laws related to biological resources that are applicable to the proposed project include:

- Bald and Golden Eagle Protection Act,
- Clean Water Act (CWA), Sections 404 and 401,
- Coastal Zone Management Act (CZMA),
- Executive Order (EO) 11990 (Protection of Wetlands),
- Executive Order 13112 (Invasive Species),
- Federal Endangered Species Act (FESA),
- Magnuson-Stevens Fishery Conservation and Management ACT (MSA),
- Marine Mammal Protection Act (MMPA),
- Migratory Bird Treaty Act (MBTA),
- National Environmental Policy Act (NEPA), and

- Rivers and Harbors Act (RHA).

Applicable state laws and regulations to the proposed project include:

- California Coastal Act (CCA);
- California Endangered Species Act of 1984 (CESA);
- California Environmental Quality Act (CEQA);
- California Fish and Game Code (CFGC), Section 1600;
- California Fish and Game Code, Sections 1385-1391 (California Riparian Habitat Conservation Act);
- California Fish and Game Code, Sections 3503, 3513, and 3800;
- Porter-Cologne Water Quality Control Act (Porter-Cologne Act); and
- Native Plant Protection Act of 1977.

ENVIRONMENTAL SETTING (BASELINE):

The project environmental study limits (ESL) are located entirely in the Coast Range ecoregion, a region consisting of coastal headlands, marine terraces, sand dunes and beaches on the immediate coast, and an inland coastal mountain range which is dominated by highly productive evergreen forests (refer to Figure 4.1). The project ESL is adjacent to and below Highway 1, a north-south trending, 2-lane winding highway with intermittent passing lanes and occasional paved or gravel pullouts. The topography of the project area is relatively flat along the areas of marine terrace and beach habitat but becomes increasingly steep across transitions from marine terrace bluffs to the river bottom beneath Salmon Creek Bridge. Elevations vary from sea level to 250 feet above mean sea level (AMSL).

The following biological study areas (BSAs) were identified for the proposed project to identify existing biological resources in the project area (refer to Figure 4.1):

- BSA #1 (Primary) – This BSA encompasses the ESL plus a 100-foot buffer to account for sensitive coastal resources as defined by the California Coastal Act. This is the primary BSA used to assess potential impacts to most of the sensitive biological resources.
- BSA #2 (Auditory/Visual/Raptors) – This BSA encompasses the ESL plus a 0.25-mile buffer to account for potential construction-related auditory and/or visual impacts to special status animal species, raptors, and their habitats.
- BSA #3 (Waters) – This BSA encompasses any waterways or waterbodies downstream of the project ESL that may have suitable habitat for special status fish species. This includes downstream portions of Salmon Creek and 100 feet into the Pacific Ocean from the mouth of Salmon Creek. These waters were assessed for potential indirect impacts as a result of potential sedimentation and/or pollutant contamination from project-related activities.
- BSA #4 (Butterflies) – This BSA encompasses the ESL plus a 330-foot buffer to account for any potential federal listed butterflies and habitats.

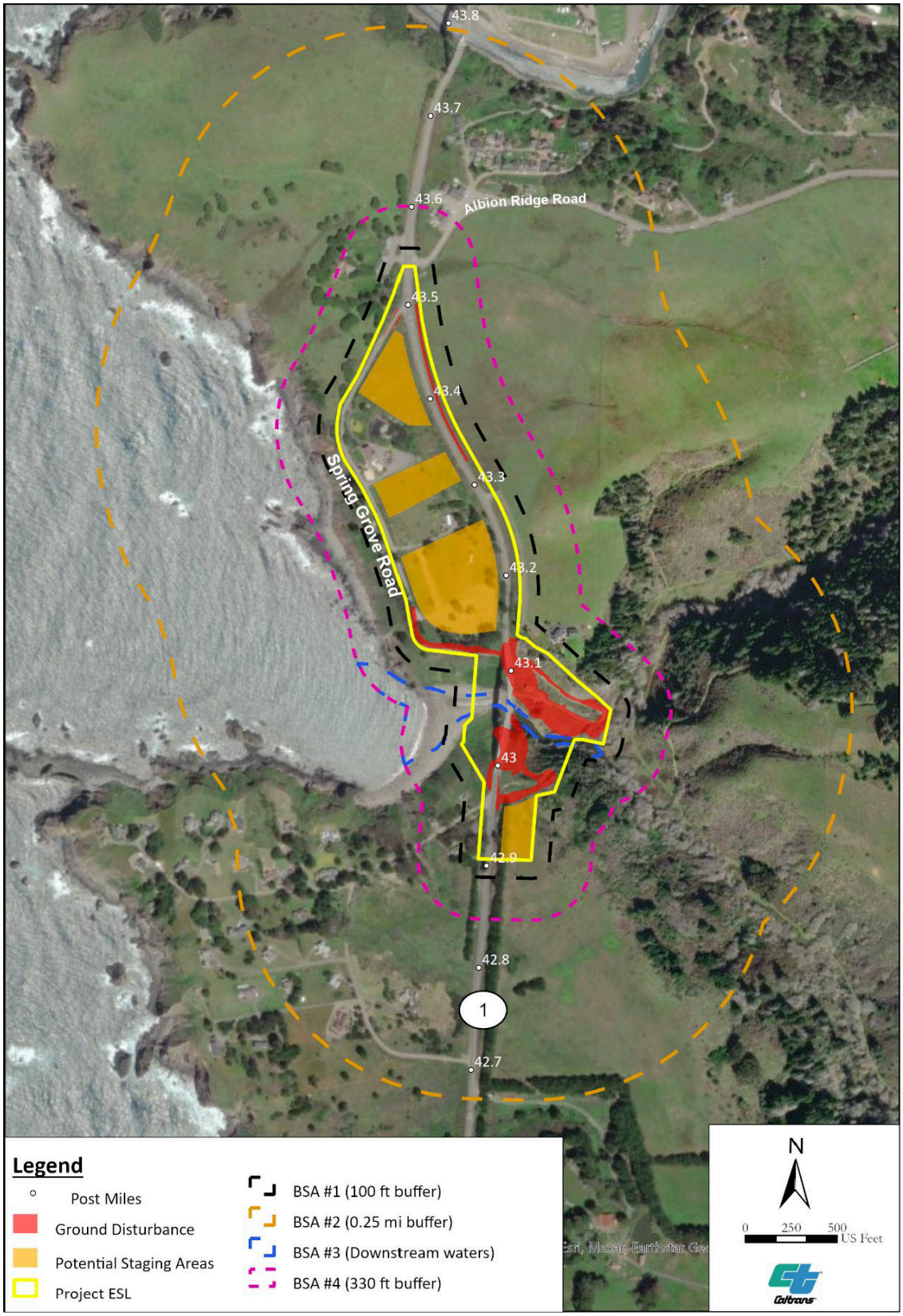


Figure 4.1
Biological Study Areas

Vegetation Land Cover Types

Twenty-two vegetation and land cover types were mapped within the BSAs. Of the 17 vegetation types identified, seven are considered sensitive natural communities (SNC) by the California Department of Fish and Wildlife (CDFW), based on CDFW's current California Natural Communities List. Additional land cover types include unvegetated beach, unvegetated open water, developed, and landscaped areas. Vegetation and land cover types mapped within BSAs include:

Grand Fir Forest - Stands of grand fir forest occur east of Salmon Creek above the Salmon Creek floodplain. Grand fir forests are dominated by grand fir and support subdominant species that include salal and California hazel. Grand fir forest is a S2/G4 ranked community and considered sensitive by CDFW.

Red Alder Forest - Stands of red alder forest border Little Salmon Creek within the BSAs, and a small patch is present along the south bank of Big Salmon Creek. This vegetation alliance is dominated by red alder with arroyo willow. California blackberry is abundant in the understory. Herbaceous species include sword fern, cow parsnip, giant horsetail, coast manroot, and stinging nettle. Red alder forest is an S4/G5 ranked community and, while not considered a SNC by CDFW, is considered riparian habitat which is regulated under California Fish and Game Code (CGFC) Section 1602.

Salmonberry–Wax Myrtle Scrub - Salmonberry–Wax Myrtle Scrub occurs along both sides of Salmon River Bridge within the BSAs. This community is dominated by wax myrtle with other shrub species, such as coyote brush, California blackberry, arroyo willow, and silk tassel. The understory is dominated by sword fern, coast manroot, California bee plant, and poison hemlock. This community is an S3/G3 ranked community and considered sensitive by CDFW.

Non-native Eucalyptus - A grove of nonnative blue gum/eucalyptus trees is found growing southwest of the Salmon Creek Bridge at the end of the private drive, Pacific Reefs Road, leading to the local water authority facility. This community is not ranked and not considered sensitive by CDFW.

Monterey Cypress–Monterey Pine Woodland Stands - Along SR 1 and public roads, there are stands of planted Monterey cypress, Monterey pine, and blue gum. This community is not ranked and not considered sensitive by CDFW.

Arroyo Willow Thicket - Arroyo willow thickets occur on the south-facing slope beneath the northern bridge abutment and in distinct patches adjacent to Spring Grove Road. Arroyo willow thickets are dominated by arroyo willow, with subdominant species such as California wax myrtle, red elderberry, and thimbleberry. The understory is dominated by such herbaceous species as stinging nettle, poison hemlock, cow parsnip, hedge nettle, sword fern, coastal wood fern, and false Solomon's seal. Arroyo willow thickets is an S4/G4 ranked community and, while not considered a SNC by CDFW, is considered riparian habitat which is regulated under CGFC Section 1602.

Salal–Berry Brambles – In the project area, Salal–berry brambles primarily occur in the drainages, swales, and north-facing slopes within the Big Salmon Creek floodplain. Within the BSAs, this community is dominated by California blackberry, with other species such as blue blossom, thimble berry, poison-oak, and Himalayan blackberry. The understory often includes bracken fern, giant horsetail, sword fern, hedge nettle, Douglas iris, sweet vernal grass, and velvet grass. This community is an S4/GNR ranked community and is not considered sensitive by CDFW.

Coyote Brush Scrub (Coastal Silk Tassel Association) Provisional Alliance - Coyote brush scrub, dominated by coastal silk tassel, occurs along the steep north-facing slope above Big Salmon and Salmon creeks within the BSAs. This vegetation alliance is dominated by silk tassel with minor components of wax myrtle, coyote brush, sword fern, salal, and thimbleberry. This alliance is considered provisional, which indicates sufficient data exists to propose the alliance, but not sufficient data to determine its status in California. This community is not ranked and not considered sensitive by CDFW.

Coyote Brush Scrub - Coyote brush scrub can be found intermittently throughout the BSAs. Coyote brush scrub consists of a shrub layer dominated by coyote brush, with other co-dominants including California blackberry, sword fern, California blackberry, thimbleberry, bracken fern, and poison-oak. Other species include salal, California coffeeberry, and sticky monkey–flower. Coyote brush scrub is an S5/G5 ranked community and not considered sensitive by CDFW.

Seaside Woolly-Sunflower - Seaside Daisy - Buckwheat Patches - Seaside woolly-sunflower–seaside daisy–buckwheat patches are present on a rock outcrop slope above Spring Grove Road near the north side of Salmon Creek Bridge. In the BSAs, this community is co-dominated by sea-cliff stonecrop, coast

buckwheat, coyote brush, and sticky monkeyflower. This community is an S3/G3 ranked community and is considered sensitive by CDFW. Pacific gilia, a special status plant, is present in this vegetation type within the BSAs.

Poison Oak Scrub - Poison oak scrub occurs within the southeastern portion of the BSAs. Poison oak scrub is dominated by poison oak and intergrades with coyote brush, California blackberry, and velvet grass–sweet vernal grass meadows. Poison oak scrub is an S4/GS ranked community and is not considered sensitive by CDFW.

Dune Mat - Dune mat occurs in a small area west of the bridge along the north bank of Salmon Creek. Typical species include dune sagewort, coastal sagewort, and beach strawberry. Dune mat is an S3/GS ranked community and is considered sensitive by CDFW.

Common Velvet Grass–Sweet Vernal Grass Meadows - Common velvet grass–sweet vernal grass meadows are the dominant coastal prairie vegetation through much of the BSAs. This community is dominated by nonnative grasses, sweet vernal grass, and velvet grass. Typical nonnative species within this community include English plantain, hairy cat's ear, creeping bentgrass, rattlesnake grass, and ripgut brome. Native species are present at lower densities, including hedge nettle, Douglas iris, and golden-eyed grass. Common velvet grass–sweet vernal grass meadow is not ranked and is not considered sensitive by CDFW. However, larval host plants (early blue violet and harlequin lotus) for two species of federally endangered butterflies are present in this vegetation type within the BSAs.

Pacific Reed Grass Meadows - Pacific reed grass meadows occur at two locations within the BSAs, including one at the intersection of Pacific Reefs Road and Highway 1 and the other just west and downslope of Highway 1 in a wet meadow adjacent to a pond maintained by the Ledford House restaurant. This community is dominated by Pacific reed grass, which may form very dense, almost mono-specific stands, or occur scattered through more diverse vegetation. Associated species include sweet vernal grass, slough sedge, cow parsnip, velvet grass, and California blackberry. Pacific reed grass meadows are an S2/G4 ranked community and is considered sensitive by CDFW. Swamp harebell and fringed cornlily, special status plants, are present in this vegetation type within the BSAs.

Idaho Fescue–California Oatgrass - Idaho fescue–California oatgrass grassland occurs at two locations in the northeastern portion of the BSAs, both of which occur at the toe of slopes and are transitional areas between velvet grass–sweet vernal grass meadows and either coyote brush scrub or arroyo willow. This community is dominated by red fescue with co-dominant species such as sweet vernal grass, velvet grass, field horsetail, bedstraw, and California blackberry. Idaho fescue–California oatgrass grassland is an S3/GNR ranked community and is considered sensitive by CDFW. Harlequin lotus, a special status plant and larval host plant of the lotis blue butterfly, was documented in this community within the BSAs.

Salt Grass Flats - Salt grass flats occur along the sandy banks of Salmon Creek in the western extent of the BSAs. This community is co-dominated by salt grass and common three-square. Salt grass flats are an S4/NR community and are not considered sensitive by CDFW.

Small-fruited Bulrush Marsh - A single occurrence of small-fruited bulrush marsh occurs along the north shore of Salmon Creek abutting arroyo willow thickets and coastal brambles. This marsh is dominated by small-fruited bulrush with co-dominant species such as Pacific silverweed, water parsley, giant horsetail, and common soft rush. Small-fruited bulrush marsh is an S2/G4 ranked community and is considered sensitive by CDFW.

Soft and Western Rush–Sedge Marshes - Soft and western rush–sedge marshes occur adjacent to the pond to the northeast of Ledford House restaurant, in the pasture area east of Highway 1, in roadside swales along Spring Grove Road, and in a small area above the northeast bridge abutment. This community is dominated by soft rush and nonnative Chinese silver grass. Soft rush marshes are an S4/G4 ranked community and are not considered sensitive by CDFW.

Beach–Unvegetated - Unvegetated beach occurs within the BSAs along Salmon Creek west of the bridge, where tidal influence precludes vegetated cover.

Developed/Paved and Landscaped - This landcover type occurs throughout the BSAs and comprises paved and gravel roads and built structures that are unvegetated or primarily support sparse ruderal and/or ornamental or managed vegetation around homes, businesses, and roads. Around private residences within the BSAs, common landscaped plants include creeping capeweed, Calla lily, and bulbil bugle-lily.

Habitat Connectivity

The California Essential Habitat Connectivity (CEHC) Project was commissioned by Caltrans and CDFW to identify and describe wildlife movement corridors in California. CECH Project identifies large parcels of intact habitat or natural landscape that support native biodiversity and areas essential for ecological connectivity between them (Essential Connectivity Areas (ECA)). Additionally, the CEHC Project models linkages between the ECAs that need to be maintained for use as wildlife corridor. The goal of the CEHC Project is to integrate natural resource considerations into transportation and land use planning processes. No natural landscape blocks or ECAs were identified by the CEHC Project in or adjacent to the BSAs. The closest natural landscape blocks are the Navarro Ridge to the southeast and Van Damme Beach State Park to the north.

Similarly, the CDFW Areas of Conservation Emphasis (ACE) is a tool that utilizes a compilation of statewide spatial information on items such as biodiversity, rarity, significant habitats, and connectivity to produce a ranking of an area's connectivity importance. The BSAs is located in an area that has an ACE ranking of 1 and is not considered an area of known importance for connectivity.

Although no wildlife movement corridors were identified within the BSAs, the coastal prairie and coastal scrub habitats along the eastern side of Highway 1 north and south of the BSAs would provide suitable mammal, amphibian, and avian corridors for dispersal or migration.

Salmon Creek provides seasonal habitat connectivity for several anadromous fish species. The estuary mouth is intermittently restricted or closed, and there are months when the creek is not connected to the Pacific Ocean by surface water sufficient to provide fish passage. Connection is presumed to occur following high precipitation events in the winter and early spring when the sand bar is breached naturally.

Invasive Species

Roads, highways, and related construction projects provide the principal dispersal pathways for invasive plant species. The introduction and spread of invasive plants adversely affects natural plant communities by displacing native plant species that provide shelter and forage for wildlife species. Plants identified in the BSA as federal noxious weeds, state noxious weed species designated by the California Department of Food and Agriculture, and invasive plants identified by the California Invasive Plant Council (Cal-IPC) are noted in the Natural Environment Study. No federal noxious weeds were observed within the BSAs.

Special Status Plants

Special status species known or likely to occur within the project region were identified based on the USFWS species list, NMFS species list, CNDDB records search, the CNPS Inventory of Rare and Endangered Plants, and species distribution and habitat requirements data. Based on the queries made to USFWS, CDFW/CNDDB and CNPS databases, 61 special status plants were identified as potentially occurring within the USGS quadrangles queried. However, only 37 of those species were identified as potentially occurring within the BSA. The BSAs either lacks suitable habitat or is outside of the elevation and/or geographic range for the remaining 24 species. Botanical surveys documented occurrences of seven special status plants within the BSAs.

Special Status Animals

Based on the queries made to USFWS, CNDDB, and CNPS databases, 53 special status animals have the potential to occur within the USGS quadrangles queried. Twenty-two of those species were identified as having potential suitable habitat within the BSAs. The BSAs either lack suitable habitat or are outside of the accepted geographic ranges for the remaining 31 species.

Waters of the U.S. and State and Riparian Habitat

Site surveys identified and mapped all jurisdictional aquatic resources within the BSAs, including any wetland or non-wetland Waters of the U.S. (WOTUS), Waters of the State, coastal wetlands, and riparian habitat. These aquatic resources include:

> Scrub-Shrub Wetlands - Several scrub–shrub wetlands were identified and mapped in the BSAs. These wetlands primarily consist of small patches of arroyo willow or red alder adjacent to Salmon Creek and patches of cascara and/or arroyo willow near and adjacent to Ledford Pond. These scrub-shrub wetlands are potential WOTUS, Waters of the State, coastal wetlands, and/or riparian habitat.
>
> Emergent Wetlands - Several emergent wetlands were identified and mapped throughout the BSA. These wetlands can be found as small patches or extensive swards along Salmon Creek, in shallow depressional areas, on areas of groundwater discharge (e.g., slope toe and seeps), and within the meadows and pastures on the northern terrace above Salmon Creek. Most of these features are

dominated by hydrophytic plants such as Pacific rush, spreading rush, velvet grass, Pacific water parsley, and/or Pacific reed grass. These emergent wetlands are potential WOTUS, Waters of the State, and/or coastal wetlands.

Coastal Wetlands - Several coastal wetlands (as defined under the CCA) were identified and mapped throughout the BSAs. Within the BSAs, these features can be found near or adjacent to the scrub-shrub and emergent wetlands described above. However, while these features have similar characteristics to the scrub-shrub and emergent wetlands, they all lack one or two of the wetland indicators (as defined by United States Army Corps of Engineers -USACE) to be considered WOTUS or Waters of the State. In addition to being potential coastal wetlands under the CCA, some of these features adjacent to Salmon Creek are also potentially riparian habitat.

Tidal Waters (Salmon Creek) - Tidal waters were identified and mapped within the BSAs. These tidal waters are located at the mouth of Salmon Creek where it meets the Pacific Ocean. Tidal waters within the BSAs are both potential non-wetland WOTUS and navigable waters (as defined under Section 10 of the Rivers and Harbors Act).

Perennial Streams - Several perennial streams were identified and mapped within the BSAs. In a typical year, perennial streams flow year-round. Groundwater is the primary source of water for stream flow, as the water table is above the streambed for most of the year. Runoff from precipitation is a supplemental source of water for stream flow. Perennial streams within the BSAs include the segment of Salmon Creek above tidal influence as well as both of its tributaries: Big Salmon Creek and Little Salmon Creek. All perennial streams within the BSAs are potential WOTUS and Waters of the State.

Intermittent Streams - Seven intermittent streams were identified and mapped within the BSAs, mostly on the steep slopes on either side of Salmon Creek. Intermittent streams typically only flow for part of the year, generally during the wet season and drying up over the summer months. Groundwater is the primary source of water for stream flow, with precipitation providing a supplemental source. All intermittent streams within the BSAs are potential WOTUS and Waters of the State.

Ephemeral Streams - One ephemeral stream was identified and mapped within the BSAs. Ephemeral streams flow only for short durations in response to precipitation, which is the only source of stream flow. One ephemeral stream was mapped along the lower portion of Spring Grove Road, and receives flows from a roadside swale via a culvert passing under Spring Grove Road. The one ephemeral stream within the BSAs is a potential Waters of the State.

Riparian Habitat - Riparian habitat generally refers to those habitats found in and adjacent to rivers, streams, or creeks that support plant species adapted to occasional or permanent flooding and/or saturated soils. Riparian habitat was identified and mapped within the BSAs, consisting of arroyo willow or red alder dominated scrub-shrub communities adjacent to the perennial and intermittent streams referenced above. All riparian habitats within the BSAs fall under the jurisdiction of CDFW (per 1602 LSA) and are also considered Environmentally Sensitive Habitat Areas (ESHAs) under the CCA. Additionally, most of the riparian habitats are also considered scrub-shrub wetlands and are potentially WOTUS, Waters of the State, and/or coastal wetlands.

Critical Habitat

Critical habitats are specific geographical areas designated by USFWS or NMFS for federally listed species with special management or protections. Located within a specific geographic area, these areas contain the physical or biological features that are essential to the conservation of endangered and threatened species (as determined by USFWS and/or NMFS) which may need special management or protection. This may include areas that were occupied by the specific species at the time it was listed, or those areas not occupied by the species at the time of listing but are considered essential to its conservation.

NMFS-designated critical habitat for coho salmon–Central California Coast ESU and steelhead–Northern California DPS is within the BSA in Salmon Creek. There is no USFWS-designated critical habitat within the BSAs.

Sensitive Natural Communities

Sensitive Natural Communities (SNCs) are natural communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. These communities may or may not contain special status taxa or their habitat. High priority SNCs are globally (G) and state (S) ranked 1 to 3, where 1 is critically imperiled, 2 is imperiled, and 3 is vulnerable. Global and state ranks of 4 and 5 are considered apparently secure and demonstrably secure, respectively. SNCs within the BSAs include dune mat, grand fir

forest, Idaho fescue–California oatgrass, Pacific reed grass meadows, salmonberry-wax myrtle scrub, seaside woolly–sunflower–seaside daisy–buckwheat patches, and small-fruited bulrush marsh.

Environmentally Sensitive Habitat Areas

Environmentally Sensitive Habitat Areas (ESHAs), as defined by the California Coastal Act, include "any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities." ESHAs may include sensitive natural communities, wetlands, known populations of special status plants, colonies of special status animals, and/or habitat for special status animals. Potential ESHAs within the BSAs include wetlands, sensitive natural communities, critical habitat for listed salmonids, and known populations of plant populations described above.

Essential Fish Habitat

Provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), as amended, require consultation with NMFS for actions that may adversely affect Essential Fish Habitat (EFH) for federally managed fish and invertebrates. For the purposes of the MSA, EFH includes "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity." EFH for coho salmon –Central California Coast ESU is present within BSA #1 in Salmon Creek. EFH for Chinook salmon, Groundfish, Coastal Pelagics, and Highly Migratory Species is not present within the BSAs.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of biological resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED:

A Natural Environment Study was prepared to identify potential biological resources within the Project Site (refer to Attachment B). To comply with the provisions of the various federal and state environmental statutes and Executive Orders, potential impacts to natural resources within the project area were investigated and documented. Biological studies were conducted of the project footprint/ESL and BSAs as appropriate to identify existing vegetation communities, sensitive natural communities, potential jurisdictional waters and wetlands, special status species, and/or suitable habitat for special status species.

Records Search

Project biologists conducted initial background research by compiling a comprehensive list of special status species and sensitive natural communities that may be present within the project footprint/ESL and BSA. Available datasets and resources were queried for known special status species data and occurrences within the Albion, Mendocino, Mathison Peak, Elk, and Mallo Pass Creek United States Geological Survey (USGS) 7.5-minute quadrangles. Information on these sensitive biological resources was obtained from the following resources:

- USFWS Environmental Conservation Online System: Information for Planning and Consultation (IPaC) list for the project locations,
- National Marine Fisheries (NMFS) West Coast Region, California Species List,
- CDFW–California Natural Diversity Database (CNDDB),
- CDFW Special Animals List,
- California Native Plant Society (CNPS)–Inventory of Rare and Endangered Plants of California,
- United States Geological Survey: National Hydrography Dataset (NHD),
- Natural Resources Conservation Service (NRCS) Web Soil Survey,
- USFWS National Wetlands Inventory (NWI) data, and
- Current and historical aerial imagery (Google Earth 2022; Esri 2022).

Aquatic Resources Delineation

The primary BSA (#1) was surveyed to identify any jurisdictional aquatic resources that may be impacted by the project. This included an assessment for the following:

- Any wetland or non-wetland Waters of the United States (WOTUS) subject to federal jurisdiction of the USACE pursuant to Section 404 of the CWA,
- Any "Navigable Waters" subject to the ebb and flow of the ocean tide pursuant to Section 10 of the Rivers and Harbors Act (RHA),
- Any wetland or non-wetland Waters of the State subject to jurisdiction of the North Coast Regional Water Quality Control Board (NCRWQCB) pursuant to the Porter-Cologne Water Quality Control Act and Section 401 of the CWA,
- Any coastal wetlands within the Coastal Zone subject to jurisdiction of the CCC pursuant to the CCA, and
- Any aquatic resources with a defined bed, bank, channel, or riparian habitat subject to jurisdiction of the California Department of Fish and Wildlife (CDFW) pursuant to Fish and Game Code Section 1602.

The methods used to delineate jurisdictional wetlands were based on the *Corps of Engineers Wetland Delineation Manual* and *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region*.

The boundaries of any jurisdictional non-wetland WOTUS or Waters of the State were delineated at the ordinary high-water mark (OHWM) in accordance with the guidelines in USACE Regulatory Guidance Letter 05-05 and *A Guide to Ordinary High Water Mark (OHWM) Delineation for Non-Perennial Streams in the Western Mountains, Valleys, and Coast Region of the united States*. The OHWM represents the limit of USACE or NCRWQCB jurisdiction over non-tidal waters (e.g., rivers).

The boundaries of any "navigable waters" subject to Section 10 of the RHA, such as those within the study area near the mouth of Salmon Creek, were determined based on the elevation of the Mean High Water (MHW) line. The MHW was primarily determined using bathymetric survey data provided by Caltrans engineers and was confirmed on-site based on the location of wrack, watermarks on hardscape, and/or other identifying characteristics.

Natural Community Mapping

The natural vegetation communities and non-vegetated landcover types were identified within the BSAs based on the vegetation classification and keys in *A Manual of California Vegetation, second edition* and online updates. The classification is based on the dominant plant species and emphasizes natural, existing vegetation. Vegetation types within the BSAs were identified at the alliance level where possible. Rarity of each vegetation type was determined from CDFW's current California Natural Communities List, the current list of vegetation Alliances, Associations, and Special Stands, which notes which vegetation types are considered sensitive.

The state rank reflects the overall status of community throughout its California range:

- 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.
- S4 (Apparently Secure) – Uncommon but not rare in the state; some cause for long-term concern due to declines or other factors.
- S5 (Secure) – Common, widespread, and abundant in the state.

For alliances with State ranks of S1, S2, and S3, all associations within them are also considered sensitive. Alliances that are not sensitive may have associations within them that are sensitive; therefore, the natural vegetation types were identified to the association level as far as possible and where necessary to determine if sensitive associations are present. Other sensitive habitat areas include riparian habitats, which are regulated by CDFW and the RWQCB.

Field surveys to map vegetation types were conducted concurrently with the special status plants surveys and the wetlands delineation surveys. During the field surveys, Caltrans botanists identified the boundaries of each vegetation type polygon and noted dominant species and associated species.

Floristic Surveys

Seasonally appropriate botanical surveys were conducted within the ESL to identify any special status plant species that may be impacted by project activities. Botanical surveys were conducted in accordance with *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*. Resources used to identify plants included *The Jepson Manual: Vascular Plants of California, second edition*, and internet resources, such as the Consortium of California Herbaria online specimen database and Calflora.

Caltrans biologists initially conducted floristic surveys in 2013 and 2014, and Caltrans and ICF biologists conducted updated floristic surveys in 2020 and 2021. Surveys were timed to coincide with the flowering periods of the special status plant species that could potentially occur within the ESL.

For the purposes of the biological evaluation, “special status plants” are those species that are legally protected or prioritized under the regulations. Special status plants reviewed in this NES include:

- Species listed or proposed for listing as threatened or endangered under FESA,
- Species that are candidates for possible future listing as threatened or endangered under FESA,
- Species listed or proposed for listing by the State of California as threatened or endangered under CESA,
- Species that meet the definitions of rare or endangered under CEQA,
- Plant species listed as rare under the California Native Plant Protection Act, and
- Plants listed by CNPS per the California Rare Plants Ranks (CRPR).
    - CRPR 1 plants presumed by the CNPS to be “extinct in California.”
    - CRPR List 1B and 2 – Plants considered by the CNPS to be “rare, threatened, or endangered in California.”
    - CRPR List 3 – Plants listed by CNPS as plants about which more information is needed to determine their status, which may be included as special status species on the basis of local significance or recent biological information.
    - CRPR List 4 – Plants with limited distribution or infrequent throughout a broader area in California, and their status should be monitored regularly.

During the field surveys, the botanists recorded all plants observed within the project ESL.

Special Status Animal Surveys and Habitat Assessments

For the purposes of this evaluation, special status wildlife species are those species that are legally protected or prioritized under the regulations. Special status wildlife species reviewed in this NES include:

- Species listed or proposed for listing as threatened or endangered under FESA,
- Species that are candidates for possible future listing under FESA,
- Species listed or proposed for listing by the State of California as threatened or endangered under CESA,
- Species that meet the definitions of rare or endangered under CEQA, and
- CDFW Species of Special Concern (SSC) and Fully Protected (FP) Species.

The BSAs were assessed for the potential to support special status wildlife species and/or their habitats via desktop review of aerial imagery and records of occurrences, site visits, and through discussions with agency personnel and species experts. General habitat assessments were conducted for all special status wildlife species provided by these record searches. Additional protocol-level surveys for federally listed butterflies were conducted in 2014, 2015, 2020, and 2021. These surveys are described below.

<u>Special Status Butterfly Surveys</u>

There were two components to the federally listed butterfly species surveys: 1) habitat assessment and surveys for the larval host plants and 2) protocol surveys for butterflies. Habitat assessments for Behren's silverspot butterfly and lotis blue butterfly were conducted by Caltrans biologists for all areas within a 330-foot buffer around the ESL within suitable habitat. The 330-foot buffer was established based on the USFWS Behren's and lotis blue butterfly survey protocol and the expertise of regional butterfly specialists. These habitat assessments included focused surveys for larval host plants and were timed during the appropriate floristic periods. Early blue violet and harlequin lotus, both the larval host plants and adult nectar plants, were mapped throughout the Butterflies BSA.

Richard Arnold of Entomological Consulting Services detailed efforts to locate lotis blue butterfly and Behren's silverspot butterfly in a memo to Caltrans dated September 26, 2014. Four field surveys were completed for Behren's silverspot butterfly in 2014 (June 23–24, July 15–16, 25–27, and August 22–24) throughout the Butterflies BSA. In 2015, four additional surveys (between April and August) were conducted for the Behren's silverspot and lotis blue butterflies to capture the flight season of this species and the onset of harlequin lotis blooming. Survey methods followed the *Draft Protocol for Presence-Absence Surveys of the Endangered Lotis Blue Butterfly* and *Draft Guidelines for Habitat Assessments and Surveys for Behren's Silverspot Butterfly* and consisted of hiking throughout accessible parcels where permission to enter had been obtained and surveying inaccessible properties using binoculars.

Butterfly surveys are generally considered acceptable for a maximum of 5 years, and surveys were repeated in 2020 and 2021. Caltrans biologist performed three focused surveys for lotis blue butterflies from May 15 to July 1, 2020. Surveys for host plants were conducted by Caltrans biologists in 2020. Surveys for Behren's silverspot butterfly were conducted from August 1 to September 15, 2021. Surveys for host plants and butterflies were appropriately timed to coincide with host plant blooming periods. Methods followed the 2015 surveys and consisted of hiking through accessible parcels and surveying inaccessible areas using binoculars.

Personnel and Survey Dates

As detailed in the Natural Environment Study, numerous site visits, surveys, assessments, delineations, and samplings were conducted in the project area between September 2012 and September 2021.

METHODOLOGY:

The following project features, standard practices (measures), and best management practices (BMPs) are included as part of the proposed project. These avoidance and minimization measures are prescriptive and sufficiently standardized to be generally applicable. These are generally measures that result from laws, permits, guidelines, resource management plans, and resource agency directives and policies. They predate the project's proposal and apply to all similar projects. For this reason, these measures and practices are not considered project mitigation and the potential effects of the proposed project are analyzed with implementation of these measures. Project features, standard measures, and Best Management Practices relevant to the protection of natural resources deemed applicable to the proposed project include:

Restoration and Revegetation

Areas where lead-impacted soils would be removed would be restored by placement and contouring of fill material, amendment of soils as needed, erosion control, revegetation, and wetland restoration. Revegetation would include methods such as hydroseeding and installation of new plants. Where excavation occurs on existing slope faces steeper than 2:1 (horizontal:vertical), fill would not be placed and the slope faces would be restored by using a combination of erosion control measures such as native sod mats, live cuttings, coir netting, and micro-stepping.

Water Quality and Stormwater Runoff

WQ-1: The project would comply with the provisions of the Caltrans Statewide National Pollutant Discharge Elimination System (NPDES) Permit (Order 2022-0033-DWQ), effective January 1, 2023. If the project results in a land disturbance of one acre or more, coverage under the Construction General Permit (CGP) (Order 2022-0057-DWQ) is also required.

Before any ground-disturbing activities, the contractor would prepare a Stormwater Pollution Prevention Plan (SWPPP) (per the Construction General Permit Order 2022-0057-DWQ) or Water Pollution Control Program (WPCP) (projects that result in a land disturbance of less than one acre) that includes erosion control measures and construction waste containment measures to protect Waters of the State during project construction. For SWPPP projects (which are governed according to both the Caltrans NPDES permit and the Construction General Permit), soil disturbance is permitted to occur year-round as long as the Caltrans NPDES and CGP and the corresponding requirements of those permits are adhered to. For WPCP projects (which are governed according to the Caltrans NPDES permit), soil disturbance is permitted to occur year-round as long as the Caltrans NPDES permit is adhered to.

The SWPPP or WPCP would identify the sources of pollutants that may affect the quality of stormwater; include construction site Best Management Practices (BMPs) to control sedimentation, erosion, and potential chemical pollutants; provide for construction materials management; include non-stormwater BMPs; and include routine inspections and a monitoring and reporting plan. All construction site BMPs would follow the latest edition of the Caltrans Storm Water Quality Handbooks: Construction Site BMPs Manual to control and reduce the impacts of construction-related activities, materials, and pollutants on the watershed.

The project SWPPP or WPCP would be continuously updated to adapt to changing site conditions during the construction phase.

Construction may require one or more of the following temporary construction site BMPs:

- Any spills or leaks from construction equipment (e.g., fuel, oil, hydraulic fluid, and grease) would be cleaned up in accordance with applicable local, state, and/or federal regulations.
- Accumulated stormwater, groundwater, or surface water from excavations or temporary containment facilities would be removed by dewatering.
- Water generated from the dewatering operations would be discharged on-site for dust control and/or to an infiltration basin, or disposed of offsite.
- Temporary sediment control and soil stabilization devices would be installed.
- Existing vegetated areas would be maintained to the maximum extent practicable.
- Clearing, grubbing, and excavation would be limited to specific locations, as delineated on the plans, to maximize the preservation of existing vegetation.
- Vegetation reestablishment or other stabilization measures would be implemented on disturbed soil areas, per the Erosion Control Plan.
- Concrete washout facilities, re-fueling areas, as well as equipment and storage areas should be covered and located away from drainage inlets and waterways to prevent both stormwater and non-stormwater discharges.
- Paving and sealing operations will be conducted to avoid and minimize the discharge of pollutants to receiving waters.
- Temporary access road entrances and exits will be stabilized and maintained to prevent sediment erosion and transport from the work area.
- For SWPPP projects (which are governed according to both the Caltrans NPDES permit and the Construction General Permit), soil disturbance is permitted to occur year-round as long as the Caltrans NPDES and CGP and the corresponding requirements of these permits are adhered to. For WPCP projects (which are governed according to the Caltrans NPDES permit), soil disturbance is permitted to occur year-round as long as the Caltrans NPDES permit is adhered to.

WQ-2: The project would incorporate pollution prevention and design measures consistent with the 2016 Caltrans Storm Water Management Plan. This plan complies with the requirements of the Caltrans Statewide NPDES Permit (Order 2022-0033-DWQ). The project design may include one or more of the following:

- Vegetated surfaces would feature native plants, and erosion control would use the seed mixture, mulch, tackifier, and fertilizer recommended in the Erosion Control Plan prepared for the project.
- Where possible, stormwater would be directed in such a way as to sheet flow across vegetated slopes, thus providing filtration of any potential pollutants.

General

BR-1: Before start of work, as required by permit or consultation conditions, a Caltrans biologist or Environmental Construction Liaison (ECL) would meet with the contractor to brief them on environmental permit conditions and requirements relative to each stage of the proposed project, including, but not limited to, work windows, drilling site management, and how to identify and report regulated species within the project areas.

Animal Species

AS-1: To protect migratory and nongame birds (occupied nests and eggs), if possible, vegetation removal would be limited to the period outside of the bird breeding season (removal would occur between September 16 and January 31). If vegetation removal is required during the breeding season, a nesting bird survey would be conducted by a qualified biologist within one week prior to vegetation removal. If an active nest is located, the biologist would coordinate with CDFW

to establish appropriate species-specific buffer(s) and any monitoring requirements. The buffer would be delineated around each active nest and construction activities would be excluded from these areas until birds have fledged, or the nest is determined to be unoccupied.

AS-2: Pre-construction surveys for active raptor nests within one-quarter mile of the construction area would be conducted by a qualified biologist within one week prior to initiation of construction activities. Areas to be surveyed would be limited to those areas subject to increased disturbance due to construction activities (i.e., areas where existing traffic or human activity is greater than or equal to construction-related disturbance need not be surveyed). If any active raptor nests are identified, appropriate conservation measures (as determined by a qualified biologist) would be implemented. These measures may include, but are not limited to, establishing a construction-free buffer zone around the active nest site, biological monitoring of the active nest site, and delaying construction activities near the active nest site until the young have fledged.

AS-3: A qualified biologist would monitor construction activities on the banks of Salmon Creek that could potentially impact sensitive biological receptors (e.g., amphibians, fish). The biological monitor would be present during all vegetation removal and soil disturbing activities that have the potential to introduce sediment or other contaminants into Salmon Creek.

AS-4: Aquatic Species Relocation Plan: An Aquatic Species Relocation Plan, or equivalent, would be prepared by a qualified biologist and include provisions for pre-construction surveys and the appropriate methods or protocols to relocate any species found. If previously unidentified threatened or endangered species are encountered or anticipated incidental take levels are exceeded, work would either be stopped until the species is out of the impact area, or the appropriate regulatory agency would be contacted to establish steps to avoid or minimize potential adverse effects.

If the animal is in imminent danger or expected to delay construction, then the animal may be safely relocated by a qualified biologist to suitable habitat outside the project area. The contractor-supplied biologist would be present during all work occurring on the banks of Salmon Creek.

AS-5: Marine Mammal Monitoring Plan: In coordination with NMFS, a Marine Mammal Monitoring Plan would be prepared by the contractor prior to construction. The plan would include observation of Whitesboro Cove (i.e., seal habitat) by a qualified biological monitor prior to beginning construction activities to note any marine mammals within a predetermined safety zone before or during construction. The biological monitor would have the authority to stop construction activities until he/she confirms the species is off site or has moved a distance that is believed to be out of range for disturbance.

Invasive Species

IS-1: Invasive non-native species control would be implemented. Measures would include:

- Straw, straw bales, seed, mulch, or other material used for erosion control or landscaping would be free of noxious weed seed and propagules.
- All equipment would be thoroughly cleaned of all dirt and vegetation prior to entering the job site to prevent importing invasive non-native species. Project personnel would adhere to the latest version of the California Department of Fish and Wildlife Aquatic Invasive Species Cleaning/Decontamination Protocol (Northern Region) for all field gear and equipment in contact with water.

Plant Species, Sensitive Natural Communities and ESHA

NC-1: Seasonally appropriate, pre-construction surveys for sensitive plant species would be completed (or updated) by a qualified biologist prior to construction in accordance with Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities.

NC-2: A Revegetation Plan would be prepared which would include a plant palette, establishment period, watering regimen, monitoring requirements, and invasive plant species management plan. The Revegetation Plan would also address measures for wetland and riparian areas temporarily impacted by the project.

NC-3: Prior to the start of work, Temporary High Visibility Fencing (THVF) and/or flagging would be installed around sensitive natural communities, environmentally sensitive habitat areas, rare plant occurrences, intermittent streams and wetlands and other waters, where appropriate. No work would occur within fenced/flagged areas.

NC-4: Upon completion of construction, all superfluous construction materials would be completely removed from the site. The site would then be restored by regrading and stabilizing with a hydroseed mixture of native species along with fast growing sterile erosion control seed, as required by the Erosion Control Plan.

Wetlands and Other Waters

WW-1: Seasonally appropriate, pre-construction surveys for sensitive plant species would be completed (or updated) by a qualified biologist prior to construction in accordance with Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities.

WW-2: In-stream work would be restricted to the period between June 15 and October 15 to protect water quality and vulnerable life stages of sensitive fish species. Construction activities restricted to this period include any work below the ordinary high water. Construction activities performed above the ordinary high-water mark of a watercourse that could potentially directly impact surface waters (i.e., soil disturbance that could lead to turbidity) would be performed during the dry season, typically between June through October, or as weather permits per the authorized contractor-prepared Storm Water Pollution Prevention Plan (SWPPP), Water Pollution Control Program (WPCP),) and/or project permit requirements.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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?

Impact Analysis:

Sensitive natural communities (SNCs) occur in the BSAs at several locations. These include vegetation alliances and associations considered sensitive by CDFW because they are of limited distribution–statewide or within a county or region and are often vulnerable to environmental effects of projects.

Seven SNCs occur within the BSAs, including dune mat, grand fir forest, Idaho fescue-California oatgrass (Festuca rubra association), Pacific reed grass meadows, salmonberry-wax myrtle scrub (Morella californica–Rubus spp. association), seaside woolly-sunflower-seaside daisy-buckwheat patches, and small-fruited bulrush marsh.

Three SNCs would be impacted by lead abatement activities, including grand fir forest, seaside woolly-sunflower–seaside daisy–buckwheat patches and small-fruited bulrush marsh. Permanent impacts to 0.003 acre of grand fir forest and 0.060 acre of seaside woolly–sunflower–seaside daisy–buckwheat patches may occur due to proposed widening of Spring Grove Road required for vehicle access. Permanent impacts to 0.081 acre of small-fruited bulrush would occur during removal of lead contaminated soil in areas in the project ESL. Although proposed restoration activities aim to restore small-fruited bulrush areas to their original condition following the removal of contaminated soils, it is speculated that the restored areas would not be functionally equivalent to the impacted community. Therefore, off-site compensation for all three SNCs would be required prior to the beginning of project construction.

Standard measures and BMPs (refer to the Methodology subsection above) would minimize project impacts to SNCs, both during and after construction. Potential impacts that could occur due to invasive nonnative plants colonizing the disturbed area would be minimized through revegetation efforts and standard measures to control/reduce the spread of invasive nonnative species and the implementation of the project's Revegetation Plan. Construction-related impacts would be avoided or minimized to the extent possible during final project design and during construction.

Because of permanent impacts to SNCs, compensation would be required at an approved mitigation bank or property prior to project construction. The final acreage of impact and compensation would be determined as part of the permitting phase of the proposed project. Caltrans would also implement the conditions and requirements of federal and state permits that would be obtained for the proposed project as part of the permitting process with the USACE, CCC, CDFW, NCRWQCB, and County of Mendocino.

Conclusion:

Implementation of off-site compensation for all three SNCs would be required prior to the beginning of project construction. Implementation of standard measures and BMPs, considered a part of the proposed project, would minimize project impacts to SNCs during and after construction. In addition, implementation of the project's Revegetation Plan would minimize and control/reduce the spread of invasive nonnative species. Overall, the proposed project with implementation of standard measures and BMPs would ensure potential impacts to 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 CDFW or USFWS would remain at less-than-significant levels.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

Riparian habitat, which includes red alder forest and some arroyo willow thicket communities adjacent to Salmon Creek, was documented in several locations within the BSAs. It should be noted that this does not include some arroyo willow thickets that are mapped as wetlands but are not considered riparian habitat as they are not associated with a watercourse.

The proposed project would result in approximately 0.839 acre of temporary impacts to riparian habitat resulting from contaminated soil removal and access road widening associated with the lead abatement activities. Exact acreages of temporary impacts to riparian habitat are preliminary until project plans are finalized and construction has been completed.

Implementation of standard measures and BMPs would minimize potential project impacts to riparian habitats during and after construction. Impacts to riparian habitat would be offset to the greatest extent practicable by onsite restoration. However, for impacts to riparian habitat that cannot be compensated for onsite, compensation would be required at an approved mitigation bank or property prior to project implementation. Caltrans would also implement the conditions and requirements of federal and state permits as part of the permitting process with the USACE, CCC, CDFW, County of Mendocino, and North Coast RWCQB. Permanent impacts to riparian habitats are not anticipated with implementation of standard measures and BMPs and with off-site compensation.

Conclusion:

Implement off-site compensation for any potential permanent impacts to riparian habitats prior to the beginning of project construction would minimize project impacts to riparian habitats during and after construction. In addition, implementation of standard measures and BMPs, considered a part of the proposed project, would minimize project impacts to riparian habitats during and after construction. Overall, the proposed project with implementation of standard measures and BMPs would ensure effects on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS are not substantially adverse and remain at less-than-significant levels.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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?

Impact Analysis:

Several jurisdictional wetlands were documented within the BSAs, including CWA 404 jurisdictional emergent wetlands and scrub-shrub wetlands and CCA jurisdictional coastal emergent wetlands and coastal scrub-shrub wetlands. The proposed project would permanently impact approximately 1.185 acres of jurisdictional wetlands resulting from contaminated soil removal and access road widening activities. The project would also temporarily impact approximately 0.572 acre of jurisdictional wetlands resulting from lead contaminated

soil removal on slopes. Exact acreages of impacts to wetlands are preliminary until project plans are finalized and construction has been completed.

Implementation of standard measures and BMPs would minimize potential project impacts to jurisdictional wetlands during and after construction. Revegetation efforts and standard measures to control/reduce the spread of invasive nonnative species and the implementation of a Revegetation Plan would minimize potential impacts that could occur from invasive nonnative plants colonizing in disturbed areas. Wetlands within staging areas would also be demarcated with ESA fencing to avoid impacts during construction.

Impacts to wetlands would be compensated to the greatest extent practicable by implementing onsite restoration. However, for impacts to wetlands that cannot be compensated for onsite, compensation would be required at an approved mitigation bank or property prior to project implementation. Caltrans would also implement the conditions and requirements of federal and state permits as part of the permitting process with the USACE, CCC, CDFW, County of Mendocino, and North Coast RWCQB.

Conclusion:

Onsite restoration and off-site compensation for any potential permanent impacts to wetlands would be implemented prior to the beginning of project construction. Onsite revegetation would begin approximately one year after the completion of construction. Implementation of standard measures and BMPs, considered a part of the proposed project, would minimize project impacts to wetlands during and after construction. Overall, the proposed project with implementation of standard measures and BMPs would ensure effects on any are not substantially adverse and remain at less-than-significant levels.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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?

Impact Analysis:

The project site contains NMFS-designated critical habitat for coho salmon–Central California Coast ESU and steelhead–Northern California DPS in Salmon Creek (BSA #1). However, the project site does not contain any USFWS-designated critical habitat. The project site also contains essential fish habitat (EFH) for coho salmon–Central California Coast ESU in Salmon Creek (BSA #1). However, the project site does not contain any EFH for Chinook salmon, Groundfish, Coastal Pelagics, and Highly Migratory Species.

Lead abatement activities would not occur within critical habitat for coho salmon–Central California Coast ESU and steelhead–Northern California DPS. In addition, lead abatement activities would not occur within EFH for coho salmon. As a result, critical habitat would not be impacted by project activities and the proposed project would result in no impacts to critical habitat for any of these species.

Migratory bird species would likely nest in the habitats present within BSAs. Implementation of standard measures and BMPs would avoid impacts to migratory birds during and after construction.

Conclusion:

There is the potential for migratory bird species to nest on or near the Project Site. Implementation of standard measures and BMPs would ensure no birds or occupied nests would be affected by lead abatement activities.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Analysis:

There are no biological resources on the Project Site that are protected by Mendocino County policies or ordinances.

Conclusion:

Implementation of lead abatement activities would not conflict with any Mendocino County polices or ordinances for the purposes of protecting biological resources.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

The Project Site is not located in any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the lead abatement activities would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Conclusion:

Implementation of lead abatement activities would not have the potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Caltrans, 2023. *Salmon Creek Sandblast Waste Abatement Project, Natural Environment Study*. May 2023.

5. CULTURAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The definition of historical resources can be found in Public Resources Code (PRC) §21084.1 and California Code Regulations (CCR) § 15064.5. Unique archaeological resources are defined in PRC § 21083.2 and 14 CCR § 15064.5. Tribal cultural resources are defined in PRC Div. 13 Section 21074.

California Assembly Bill 52 (AB52) specifies that any project for which a Notice of Preparation, Notice of Mitigated Negative Declaration or Notice of Negative Declaration is filed on or after July 1, 2015, the Lead agency must provide formal notification within 14 days of determining that an application for a project is complete or of a decision to undertake a project to the designated contact or tribal representative of the affiliated California Native American tribes. The tribe that is traditionally and culturally affiliated to the geographic area where a project is located must have requested that the lead agency in question provide notification to the tribe (PRC 21081.3.1). Please refer to Section 18, Tribal Cultural Resources, of this Initial Study for additional discussion.

If human remains are found on Site, the County Coroner will make the determination of origin and disposition, pursuant to PRC § 5097.98. If the remains are determined to be Native American, the Coroner would notify the Native American Heritage Commission (NAHC) (per Health and Safety Code (HSC) 7050.5(c)) The NAHC would identify and notify the person(s) who might be the most likely descendent, who would make recommendations for the appropriate and dignified treatment of the remains (PRC Div. 5 section 5097.98). The descendants shall complete their inspection and make recommendations for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

ENVIRONMENTAL SETTING (BASELINE):

A cultural resource study of the project site began with a search of *Caltrans' Cultural Resource Database* and cultural resource files at Caltrans District 1 office in Eureka, CA, which were reviewed for previous field surveys and previously recorded cultural resources. In addition, a records search at the Northwest Information Center of the California Historical Resources Information System at Sonoma State University in Rohnert Park, was conducted in 2015. The records search documented all previously recorded archaeological sites and prior cultural resource studies conducted within a ¼ mile radius of the area of potential effect (APE) associated with the remediation activities. A total of fifteen previous studies were conducted within the APE between 1976 and 2015. Other archives and information sources were consulted and included but were not limited to the following sources:

- National Register of Historic Places (NRHP);
- California Register of Historic Resources (CRHR);
- California Inventory of Historic Resources (1976);
- Directory of Properties in the Historic Property Data File (HPDF);
- Caltrans Bridge Inventory;
- Caltrans As-Built Plans and previous road construction files;
- Local inventories;
- Historical topographic maps;
- GLO and/or Rancho Plat maps;
- Other historical maps (e.g., Metsker's maps, Sanborns);

- Government documents (Construction plans, Census records, Voter's Registers, etc.); and
- On-line newspaper archives (California Digital Newspaper Collection, Newspapers.com, Newspaper archive)

The records search identified six previously recorded archaeological and built environment cultural resources within the APE including:

- Salmon Creek Bridge,
- Beach shack vacation residence,
- Caretaker's residence,
- Historic-era townsite of Whitesboro,
- Abandoned segments of historical State Route 1, and
- Remains of the mid-20th Century Aero Stud Sawmill.

The Native American Heritage Commission (NAHC) was contacted on September 9, 2020, to request a search of their sacred land files within a ¼ mile radius of the APE. In a letter dated September 14, 2020, the NAHC responded that the sacred land file search was negative and provided a list of seven Native American tribes and individuals who may have knowledge of cultural resources in the project area.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

Due to the presence of cultural resources within the APE, testing strategies were developed to evaluate the resources within the APE and determine if any cultural resources contained data that would qualify them as eligible for the National Register of Historic Places (NRHP), to assist in complying with Section 106 of the National Historic Preservation Act and its implementing regulations. It was also important to determine if they are eligible for listing on the California Register of Historic Resources (CRHR) and whether they are a significant resource for the purposes of California Environmental Quality Act (CEQA). It is important to note that a cultural resource determined eligible for listing in the NRHP or CRHR is considered to have the same status as a listed resource for purposes of the project or undertaking.

A property may be listed in or eligible for the NRHP if it meets the following criteria for evaluation as defined in 36 CFR 60.4:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

A pedestrian survey of this project APE and surrounding area was previously conducted in 2013 and 2014 that identified the six cultural resources listed above. A field survey conducted on March 29, 2021, located the six previously recorded resources and found the condition of these resources the same as previously reported. No new resources were identified during this field visit. After the addition of three parcels to the APE being considered for staging areas, additional field survey was undertaken on April 12th, 13th, and 20th, 2023 to cover these three parcels. No new resources were identified.

The entire APE was covered walking a series of transects spaced five to ten meters apart. Areas with poor ground visibility due to heavy vegetation were cleared every five meters to inspect the ground surface. Steep slopes were surveyed where feasible. A research plan was created to determine the extent and integrity of archaeological deposits within the sites of the Aero Stud Sawmill and the historic-era townsite of Whitesboro. Historic-era documentation, maps, and photographs were consulted to determine which areas of the APE were likely to contain subsurface deposits. Steep terrain and dense vegetation limited the scope of the subsurface testing as well as limitations required by the landowner, which did not allow for vegetation clearing nor the use of mechanical equipment.

Archaeological testing was conducted using shovel probes, control units and auger holes, from May 19 to 22, 2014, June 18, 2014, and December 9, 2014. In 2021, additional subsurface testing was conducted to cover the APE. Due to the size of the Whitesboro townsite and access restrictions by the landowner, only the areas to be directly impacted by the proposed project were tested. The results of subsurface testing allowed both sites to be evaluated against the federal and state criterion for potential eligibility to the NRHP and CRHR.

During subsurface testing, evidence of a prehistoric shell midden was found beneath the town of Whitesboro. Sampling of the site determined the site deposits were undisturbed, likely due to a layer of gravel put in place to provide a solid base before construction of historic-era buildings. Because the prehistoric site was below the level of lead mitigation, and because a research design had not been developed for this previously unknown site, this prehistoric deposit received only cursory investigation at the time. The project site was assumed to be eligible to the NRHP and a vertical environmentally sensitive area (ESA) was designated to protect this site from lead abatement activities.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?

Impact Analysis:

Six known cultural resources were evaluated against the above listed criteria and determined as follows:

- Salmon Creek Bridge: The bridge is listed as a Category 5 bridge that has been previously determined not eligible to the National Register under Section 106 PA, Stipulation VIII.C.5.
- Beach Shack Vacation Residence: The beach shack was evaluated by an architectural historian that meets the Secretary of Interior's Standards and determined not eligible under the Section 106 PA Stipulation VIII.C.6.
- Caretaker's Residence: The caretaker's residence was evaluated by an architectural historian that meets the Secretary of Interior's Standards and was also determined not eligible under the Section 106 PA, Stipulation VIII.C.6.
- Abandoned Segments of Historical State Route 1: The bypassed segments of State Route 1 meet the criteria for Section 106 PA, Attachment 4, and are exempt from evaluation.
- Historic Townsite of Whitesboro: The area of the townsite within the project APE did not contain intact subsurface deposits. Material contemporaneous with the townsite were encountered; however, all of this material seems to be redeposited, likely by annual flooding of the Little Salmon Creek. There were no in situ remnants of buildings or other features, nor intact stratified deposits. The archaeological studies showed that the portion of the site in the APE does not convey its assumed historic significance. The site constituents of the historic-era components of the site within the APE do not retain integrity of setting, feeling, design, materials, and workmanship because of historical and modern land modification. The prehistoric component of the site below the Whitesboro townsite deposit, has yielded information important to prehistory and retains integrity necessary to convey the site's significance under Criterion D. This component of the site will be protected by a vertical ESA. Because of the size and access restrictions to the remainder of the site, the site as a whole could not be evaluated. The remainder of the site outside of the APE and untested portions of the site were assumed eligible to the NRHP and CRHR and will be protected by a vertical and horizontal ESA.
- Remains of Mid- 20th Century Aero Stud Sawmill: A concrete foundation for a single building of the Aero Stud Sawmill was identified on the bluff north of the bridge; however, no artifacts or other features related to the mill were identified during survey and subsurface testing. Evaluation of this site against the NRHP and CRHR criteria determined the Aero Stud Sawmill site did not appear eligible to the NRHP or CRHR.

Consistent with 36 Code of Federal Regulations (CFR) §800.5(a)(1), an adverse effect to a cultural resource occurs when an "undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register."

If a cultural resource could be affected by the proposed project, the Criteria of Adverse Effect to assess those effects, pursuant to Stipulation IX.B of the Section 106 PA and consistent with 36 CFR § 800.5(a)(1), must be applied. If the APE contains more than one historic property, it is possible that the proposed project may have no adverse effect on some cultural resources, but an adverse effect on others. Therefore, there are four possible findings for the identified cultural resources present on the project site:

1. No Historic Properties Affected,
2. Finding of No Adverse Effect with standard conditions (FNAE-SC),
3. Finding of No Adverse Effect (FNAE), or
4. Finding of Adverse Effect (FAE).

Applying the criteria of adverse effect described above concluded the proposed project would result in a Finding of No Adverse Effect with Non-Standard Conditions. Evaluation of the cultural resources on the project site was documented in the *Finding of No Adverse Effect with Non-Standard Conditions*. In a letter dated December 12, 2021, the SHPO concurred with the following:

- The Salmon Creek Bridge is not eligible to the NRHP nor CRHR.
- The Beach Shack Vacation Residence is not eligible to the NRHP nor CRHR.
- Caretaker's Residence is not eligible to the NRHP nor CRHR.
- Abandoned Segments of Historical State Route 1 (P-23-4613) are exempt from evaluation.
- The portion of the Whitesboro townsite within the area of direct impact (ADI) of the lead abatement project, lacks sufficient data potential to address important research questions in history. The untested area of the site, and that outside the ADI, will be assumed eligible and protected with horizontal and vertical ESA. The prehistoric component of the site below the Whiteboro townsite deposit, has yielded information important to prehistory and retains integrity necessary to convey the site's significance under Criterion D. This portion of the site will be projected by a vertical ESA. Any work done within the site boundary will have an archaeological and tribal monitor. Specific construction requirements will be followed such as using flat blade buckets (i.e., no toothed buckets).
- The remains of Mid- 20th Century Aero Stud Sawmill are not eligible to the NRHP nor CRHR.

Along with the *Finding of No Adverse Effect with Non-Standard Conditions*, an *Environmentally Sensitive Area Action Plan* and a *Post-Review Discovery Plan* were submitted, and the SHPO also concurred these plans were sufficient and should be implemented during project activities.

Additional identification efforts were conducted on the project site in 2023 and determined there were no new cultural resources identified. These efforts were documented in a *Supplemental Archaeological Survey Report* and sent to the SHPO for consultation. The SHPO concurred that the additional identification efforts were sufficient, and these areas would fall under the *Post-Review Discovery Plan*. The additional identification efforts would not change the previous Finding of No Adverse Effect with Non-Standard Conditions.

Based on pedestrian and field surveys of the project site and conclusions made for the cultural resources identified on the project site, the proposed project would not result in a substantial adverse change in the significance of a cultural resource pursuant to in §15064.5.

Conclusion:

The Proposed Project would not include demolition, elimination, or manipulation of an identified historical resource. Therefore, the Proposed Project would not cause a substantial adverse change in the significance of a known historical resource.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact Analysis:

Refer to impact discussion in Section 5(a) above.

Conclusion:

The Proposed Project would not include demolition, elimination, or manipulation of an identified archaeological resource. Therefore, the Proposed Project would not cause a substantial adverse change in the significance of a known archaeological resource.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Impact Analysis:

There are no known human remains on or near the project site. In addition, the findings of the cultural resource study did not identify any human remains. However, if human remains are encountered, the County Coroner would be immediately notified. No further ground disturbing activities shall occur within 25 feet of the work area until the County Coroner has made a determination of origin and disposition, pursuant to PRC § 5097.98. If the remains are determined to be Native American, the Coroner would notify the NAHC (per Health and Safety Code 7050.5(c)) and the County Coordinator of Indian Affairs.

Conclusion:

Implementation of proposed project is not expected to encounter or disturb any human remains, including those interred outside of dedicated cemeteries. If human remains are encountered, procedures will be followed to prevent disturbing the remains and ensure compliance with applicable codes and regulations.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

Caltrans, 2023. *Cultural Resource Identification Efforts Memorandum*. April 27, 2023.

6. ENERGY				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

In 2015, Governor Brown signed Senate Bill 350 to codify climate, clean energy, and energy efficiency goals. The regulations focus on generating energy through renewable sources and increasing the energy efficiency of buildings.

ENVIRONMENTAL SETTING (BASELINE):

Electrical power and natural gas are provided to the Project Site by Pacific Gas and Electric Company (PG&E). PG&E obtains its energy supplies from power plants and natural gas fields in northern California and from energy purchased outside its service area and delivered through high voltage transmission lines.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of energy resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of significant increase in energy demand from the Project Site, no environmental studies relating to energy resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Result in potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact Analysis:

To implement the proposed project, it is expected that construction equipment (e.g., tractors, excavators, loaders, generators, trucks, light-duty vehicles) would use petroleum fuels (diesel and gasoline products) and would not use on-site electricity or natural gas sources. Construction of the proposed lead abatement would occur over a short duration (4 months) and, therefore, the wasteful, inefficient, or unnecessary use of petroleum fuels would not occur. Implementation of the proposed project would not result in adding any new facilities that would increase the demand for energy resources.

Conclusion:

The proposed project would not add new facilities that could increase the demand for energy resources. Construction activities would use equipment in accordance with manufacturer's specifications. Therefore, implementation of the proposed lead abatement would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. In addition, the lead abatement activities would not result in a new permanent energy demand.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Analysis:

In 2015, Governor Brown signed Senate Bill 350 to codify climate, clean energy, and energy efficiency goals. The regulations focus on generating energy through renewable sources and increasing the energy efficiency of buildings. Implementation of the lead abatement would not result in constructing any new buildings that would increase the demand for energy resources, renewable or otherwise.

Conclusion:

The proposed project would not construct new facilities or permanent structures and would not generate any new energy demands. Therefore, the proposed project would not conflict with or obstruct any state or local plan for renewable energy or energy efficiency.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Legislative Information. 2015. SB-350 Clean Energy and Pollution Reduction Act of 2015. October. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350 (Accessed June 2023).

7. GEOLOGY AND SOILS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting geological or soil resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

The project site is located on the far west edge of the Northern Coast Ranges subset of the Coast Ranges Geomorphic Province. The Coast Ranges are north-west trending mountain ranges (typically 2,000 to 4,000 feet elevation above mean sea level (amsl) and valleys that run subparallel to the San Andreas Fault. The province is bordered to the west by the Pacific Ocean, to the east by the Great Valley Geomorphic Province, to the south by the Transverse Ranges of southern California, and to the north by the Klamath Mountain Range.

Natural Resources Conservation Service (NRCS) soil survey data for Mendocino County identifies four soil map unit types mapped in the ESL including Biaggi loam, Cabrillo-Heeser complex, Dystropepts, and Mallopass loam.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of geological and soils resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Site lithology has been characterized through investigations completed as part of the site investigations. Soil samples were also collected and characterized.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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.

Impact Analysis:

The Project Site is not located in an Alquist-Priolo Earthquake Fault Zone and a known earthquake fault does not cross the site (CGS 2023). The closest Alquist-Priolo Earthquake fault to the project site is the San Andreas fault located approximately 10 miles to the south.

Site workers would be present for a short duration during proposed project activities (4 months) and, therefore, the potential for exposure to substantial risk of injury to people would be limited. In addition, the proposed project does not include construction of any structures that could expose people or structures to significant impacts from fault rupture associated effects.

Conclusion:

The Project Site is not identified as being in an Alquist-Priolo Earthquake Fault Zone and no known earthquake faults exist on the site; therefore, the risk of loss, injury, or death involving from onsite ruptures would not occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

ii) Strong seismic ground shaking?

Impact Analysis:

The Project Site is located in a seismically active area (San Andreas fault is located approximately 10 miles to the south) and the site could be exposed to moderate to strong shaking in the event of an earthquake in the region (CGS 2023).

Lead abatement activities would require the use of heavy equipment and would place numerous workers onsite. Site workers would be present for approximately 4 months; therefore, the potential for substantial risk or injury to people from seismic ground shaking (such as an earthquake) would be limited. In addition, the proposed project would not include construction of any kind that could expose people or structures to significant impacts from strong seismic ground shaking if it were to occur.

Conclusion:

The Project Site is located in a seismically active area and the site could be exposed to moderate to strong shaking. However, the proposed project activities would occur outdoors away from any structures. Therefore, the risk of loss, injury, or death from strong seismic ground shaking would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

iii) Seismic-related ground failure, including liquefaction?

Impact Analysis:

The Project Site has a high liquefaction susceptibility based on its geographic location (approximately 10 miles north of the San Andreas fault). Soils susceptible to liquefaction, which generally occurs at depths shallower than 50 feet below ground surface (ft-bgs), may lose their ability to support structures. However, the lead abatement activities would not involve building new structures above ground.

Site workers would be present for the short project duration (4 months); therefore, the potential for substantial risk or injury to people would be limited. In addition, the proposed project would not include construction of any structures that could expose people or structures to significant impacts from seismic-related ground failure, including liquefaction.

Conclusion:

The Project Site is located in a seismically active area and the site could be exposed to moderate to ground failure, including liquefaction. However, the proposed project activities would occur outdoors away from any structures. Therefore, the risk of loss, injury, or death from seismic-related ground failure, including liquefaction, would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

iv) Landslides?

Impact Analysis:

The Project Site has a susceptibility from landslides based on its geographic location (approximately 10 miles north of the San Andreas fault) and steep slopes. However, the lead abatement activities would not involve building new structures above ground. In addition, existing steep slopes would not be altered which would prevent the creation of new landslide hazard.

Site workers would be present for the short project duration (4 months); therefore, the potential for substantial risk or injury to people from a landslide would be limited. In addition, the proposed project would not include construction of any structures that could expose people or structures to significant impacts from a landslide.

Conclusion:

A landslide hazard is considered to exist on the Project Site. However, the proposed project activities would occur outdoors away from any structures. Therefore, the risk of loss, injury, or death from a landslide would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Result in substantial soil erosion or the loss of topsoil?

Impact Analysis:
Necessary excavation and site preparation would include clearing and grubbing of vegetation, and removal of soils where appropriate. Drilling, open cutting, and blasting would not be necessary for the lead abatement activities. The proposed project would import backfill and implement revegetation and erosion control activities to prevent soil erosion after lead abatement has completed (refer to the description of the revegetation activities in Section 4, Biological Resources, above).

Conclusion:

Design of the proposed project, including revegetation and backfill, would reduce the risk of or prevent soil erosion or loss of topsoil in the project area. Impacts related to soil erosion and loss of topsoil would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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?

Impact Analysis:

The Project Site has a susceptibility from landslides, lateral spreading, subsidence, and/or liquefaction based on its geographic location (approximately 10 miles north of the San Andreas fault) and steep slopes. However, existing steep slopes would not be altered which would prevent the creation of new landslide hazard. In addition, the proposed project would import backfill and implement revegetation activities to prevent soil erosion after lead abatement has completed (refer to the description of the revegetation activities in Section 4, Biological Resources, above).

Site workers would be present for the short project duration (4 months); therefore, the potential for substantial risk or injury to people from unstable soils would be limited. In addition, the proposed project would not include construction of any structures that could expose people or structures to significant impacts from unstable soils.

Conclusion:

The Project Site is located in a seismically active area and the site could be exposed to moderate to ground failure of unstable soils. However, the proposed project activities would occur outdoors away from any structures. Therefore, the risk of loss, injury, or death from seismic-related ground failure involving unstable soils would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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?

Impact Analysis:

Expansive soils are characterized by their ability to undergo volume change due to variations in moisture content. The Project Site is not located on an area underlain by expansive soils. In addition, the lead abatement activities would not involve construction of new structures or facilities above ground.

Conclusion:

Proposed lead abatement would not result in any new structures or facilities being placed on expansive soils. Therefore, substantial risk to life or property from expansive soils would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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?

Impact Analysis:

The proposed project activities would not require the use of septic tanks or alternative wastewater disposal systems nor involve construction of such new systems.

Conclusion:

The use or construction of septic tanks or alternative wastewater disposal systems are not part of the proposed lead abatement. No impact involving septic tanks or alternative wastewater disposal systems as a result of onsite soils would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact Analysis:

Refer to impact discussion in Section 5(a) above for discussion of unique features on the project site. Related to paleontological resources, there are existing statutes intended for the protection of paleontological resources including California PRC Division 5, Chapter 1.7, Section 5097.5, which states:

> A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

This statute prohibits the removal, without permission, of any paleontological site or feature from land under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, state agencies are required to comply with PRC Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC Section 5097.5 also establishes the removal of paleontological resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (i.e., state, county, city, district) land.

In addition, Title 14, Section 4307 of the California Code of Regulations states:

> No person shall destroy, disturb, mutilate, or remove earth, sand, gravel, oil, minerals, rocks, paleontological features, or features of caves.

Even though a site-specific survey for paleontological resources was not conducted, the previously mentioned regulations would protect unknown paleontological resources that could be discovered during excavation activities associated with the lead abatement activities. Therefore, the proposed project would not knowingly destroy a unique paleontological resources or site unique feature.

Conclusion:

The Proposed Project would not include demolition, elimination, or manipulation of an identified paleontological resource. Therefore, the Proposed Project would not cause a substantial adverse change in the significance of a known unique feature or paleontological resource or unique site feature.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

California Department of Conservation, California Geological Survey (CGS). 2023. Earthquake Zones of Required Investigation. https://maps.conservation.ca.gov/cgs/EQZApp/app/ (Accessed June 2023).

California Soil Resource Lab. 2023. SoilWeb. https://casoilresource.lawr.ucdavis.edu/gmap/ (Accessed June 2023).

Caltrans, 2023. *Salmon Creek Sandblast Waste Abatement Project, Natural Environment Study*. May 2023.

8. GREENHOUSE GAS EMISSIONS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The Mendocino County Air Quality Management District (MCAQMD) does not identify a standard for determining the significance of project-related construction GHG emissions. However, greenhouse gases potentially generated by project implementation were quantified and standards established by the Sacramento Metropolitan Air Quality Management District (SMAQMD) were used to determine the significance of construction-related GHG emissions.

ENVIRONMENTAL SETTING (BASELINE):

Greenhouse gases are global pollutants, unlike criteria air pollutants that are of regional or local concern. The largest anthropogenic source of GHGs is the combustion of fossil fuels, which results primarily in emissions of carbon dioxide (CO_2). Other GHGs include methane, nitrous oxide, fluorinated gases, ozone, and sulfur hexafluoride. To account for the differences of the warming effects of various GHGs, emissions are standardized into carbon dioxide equivalents (CO_2e).

For the purposes of the proposed project, baseline conditions are considered to be existing GHG conditions in the project area at the time construction activities start.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The California Supreme Court, in *Center for Biological Diversity v. Department of Fish and Wildlife* (Case No. S217763) held that the lead agencies must connect the thresholds of significance to individual project emissions. As neither the DTSC nor the ACAPCD have established screening thresholds for GHG emissions, this analysis reviewed guidelines used by other air districts and public agencies in order to establish context in which to consider the proposed project's GHG emissions.

The SMAQMD adopted a significance threshold of 1,100 MT of CO_2e per year for both construction and operational phases of projects (SMAQMD 2016). SMAQMD recognizes that although there is no-known level of-emissions that determines if a single project will substantially impact overall GHG emission levels in the atmosphere, a threshold must be set to trigger a review and assessment of the heed to mitigate project GHG emissions (SMAQMD 2016). The SMAQMD recommended thresholds were developed to ensure at least 90 percent of new GHG emissions would be reviewed and assessed for mitigation, thereby contributing to GHG emissions reduction goals of AB 32, SB 32, the Scoping Plan, and Executive Orders (SMAQMD 2016). A GHG significance threshold based on a 90 percent emission capture rate is appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. The emission thresholds capture a substantial fraction of projects that will be constructed to accommodate future statewide population and economic growth.

Other air districts in Northern California have developed recommendations for construction and operational GHG emissions. For example, Bay Area Air Quality Management District (BBAQMD) adopted an annual bright-line GHG threshold of 10,000 MT CO_2e for the construction and operational phases of land use and stationary source projects in 2022.

For a conservative review of the project impacts, this analysis uses the significance threshold of 1,100 MT of CO_2e per year developed by the SMAQMD to evaluate the proposed project's impact on global climate change. It is not the intent of the DTSC to adopt this threshold as a mass emissions limit for all projects, but rather to provide this additional information to put the proposed project-generated GHG emissions in the appropriate statewide context.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

California Emissions Estimator Model ® (CalEEMod, Version 2022.1.1.16) was run to determine if project-related air emissions exceed BAAQMD Thresholds of Significance. The CalEEMod results are summarized in Table B-1, and the model basis information is summarized in Table B-2 and B-3 (refer to Attachment A). Complete CalEEMod Input and Output is provided in Attachment A. The following construction equipment was considered in modeling air emissions:

- On-road trucks (worker transportation)
- Loaders
- Rubber tire dozer
- Excavators
- Graders
- Backhoes
- Generators

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Analysis:

Implementation of proposed lead abatement activities would generate GHG emissions through mobilization of construction equipment; onsite delivery of materials, equipment and supplies; onsite movement of waste materials (e.g., excavation of lead contaminated soils); onsite use of vehicles and heavy equipment; worker commutes to the Project Site; and demobilization activities.

The CalEEMod was run to identify the potential greenhouse gas emissions generated by implementation of proposed remediation activities. Results of the model indicate that project activities would generate approximately 510 metric tons of CO_2e during the construction period of 4 months (refer to Attachment A). Carbon dioxide equivalent, or CO_2e, is a term for describing different greenhouse gases in a common unit. For any quantity and type of greenhouse gas, CO_2e signifies the amount of CO_2 which would have the equivalent global warming impact (Ecometrica 2012). Although the MCAQMD does not provide a construction-related threshold of significance for GHG emissions, construction-related CO_2e emissions were compared to thresholds established by the SMAQMD of 1,100 MT of CO_2e per year for both construction and operational phases of projects (SMAQMD 2016). Therefore, the project's generation of 510 metric tons of CO_2e would be below the SMAQMD threshold of significance.

Conclusion:

The proposed project would not result in a new permanent stationary or non-stationary source of GHGs and construction-related GHG emissions would be short-term and temporary. In addition, the estimated CO_2e emissions from implementing the proposed stormwater infrastructure improvements (510 metric tons of CO_2e) would fall below SMAQMD threshold of significance for land-use projects (1,100 metric tons of CO_2e per year). Therefore, GHG emissions resulting from implementation of the proposed project are considered to have a less-than-significant impact on the environment.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis:

The MCAQMD is responsible for regulating GHG emissions in the project area. The MCAQMD recommends that GHGs for projects be quantified; however, the guidelines do not identify a CEQA threshold of significance

for construction-related GHG emissions. In addition, construction activities would not conflict with any goals set by the MCAQMD to achieve the County's implementation of Assembly Bill 32 pertaining to global warming (CARB, 2006).

Conclusion:

The operation of construction equipment during implementation of stormwater infrastructure improvements at the Project Site would be short-term and temporary and would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. All construction activities would be performed in compliance with the MCAQMD ules and polices. No impact related to conflict with a GHG reduction plan would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Air Resources Board. 2006. Assembly Bill No. 32. Available at: https://ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-warming-solutions-act-2006 (Accessed April 7, 2022).

Ecometrica 2012. Greenhouse Gases, CO_2, CO_2e, and Carbon: What Do All These Terms Mean? Available at: https://ecometrica.com/assets/GHGs-CO2-CO2e-and-Carbon-What-Do-These-Mean-v2.1.pdf (Accessed April 7, 2022). Authored by Matthew Brander.

9. HAZARDS AND HAZARDOUS MATERIALS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Federal laws and regulations: Resource Conservation and Recovery Act (RCRA) Title 42 United States Code and 40 Code Federal Regulations (CFR) Parts 260-279. More specifically, hazardous waste generators are governed by 40 CFR part 262, subpart E and transporters of hazardous waste governed by 40 CFR part 263. RCRA gives EPA the authority to control hazardous waste from the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid waste. The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration regulates the transport of hazardous materials through Title 49 of the Code of Federal Regulations, Subchapter C.

State laws and regulations: Hazardous Waste Control Law (Health and Safety Code (HSC) Chapter 6.5) and 22 California Code of Regulations (CCR). The law establishes regulations and incentives which ensure that the generators of hazardous waste employ technology and management practices for the safe handling, treatment, recycling, and destruction of their hazardous wastes prior to disposal. Article 6 of HSC Chapter 6.5 discusses the transportation of hazardous waste. California Vehicle Code: Divisions 2, 6, 12, 13, 14, 15 also apply to transportation of hazardous materials.

ENVIRONMENTAL SETTING (BASELINE):

The project site is developed with rural residential uses but is primarily undeveloped and undisturbed. Existing uses on the project site do not operate or generate hazardous waste.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of hazards and hazardous materials effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance**.**

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of hazards or hazardous materials on the Project Site, no environmental studies relating to hazards and hazardous materials were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Create a significant hazard to the public or the environment throughout the routine transport, use, or disposal of hazardous materials?

Impact Analysis:

The project aims to remediate lead contaminated soils on the project site. Hazardous materials used during implementation of the project would include fuels and oils for standard operation of construction equipment. Proper storage and disposal, the use of best management practices (BMPs), and compliance with applicable laws and regulations governing the management of hazardous materials and hazardous waste would minimize potential impacts associated with the use of such materials. Construction activities are estimated to occur over a 4-month period during use and transport of hazardous materials, and management and/or transport of waste generated would occur. The routine management, storage, and transport of materials would be consistent with all applicable federal and state laws. Accidental releases of hazardous or remediation materials would be minimized through the implementation of a Stormwater Pollution Prevention Plan (SWPPP), and with enhanced spill response training for construction workers.

Conclusion:

With adherence to the SWPPP and standard practices, implementation of proposed stormwater infrastructure would not a create a significant hazard to the public or the environment throughout the routine transport, use, or disposal of hazardous materials. Project-related impacts would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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?

Impact Analysis:

The project aims to remediate lead contaminated soils on the project site. Implementation of project at the site would not have the potential to release any known hazardous material into the environment during construction activities. Hazardous materials used during implementation of the project would include fuels and oils for standard operation of construction equipment. Proper storage and disposal, the use of BMPs, and compliance with applicable laws and regulations governing the management of hazardous materials and hazardous waste would minimize potential accidental release of fuel, oil, or maintenance chemicals from construction equipment. In addition, accidental releases of hazardous or remediation materials would be minimized through the implementation of a Stormwater Pollution Prevention Plan (SWPPP), with enhanced spill response training for construction workers, and with covered transport trucks for disposal of contaminated soils.

Conclusion:

With adherence to the SWPPP and standard practices, implementation of proposed lead abatement would not a 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. Project-related impacts would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?

Impact Analysis:

There are no schools located within one-quarter mile of the Project Site. Therefore, implementation of proposed lead abatement would not a create a significant hazard to schools.

Conclusion:
With adherence to standard practices, implementation of proposed lead abatement activities would not a create an impact to schools.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

The Project Site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Conclusion:

The Project Site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; therefore, no impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

The Project Site is not located within the boundaries of an airport land use plan. The closest airport to the site is Little River Airport which is located approximately 3 miles to the north. Based on the distance of the project site from the Little River Airport, the project site is located outside of any established safety zones and influence area.

Conclusion:

The proposed lead abatement would not occur in an area located within an airport land use plan. Therefore, implementation of the project would not result in a safety hazard or excessive noise for people residing or working in the project area.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Impact Analysis:

The transportation of equipment and materials to and from the Project Site have the potential to impair implementation or interfere with the existing emergency response plan and/or evacuation plan. Specifically, trucks carrying equipment and materials could slow down the flow of traffic on public streets and potentially impede emergency response or evacuation efforts. A Transportation and Traffic Control Plan (TCP) would be implemented prior to construction activities that describes the means and methods to be used in providing access during construction and includes all traffic control, detours, temporary markings and signage, and other work associated with maintaining access through the project area. As a result, if an emergency were to occur, the contractor would be able to maintain and provide needed access for emergency vehicles.

Conclusion:

The proposed project would implement a TCP that would allow for suspending construction activities that could impair implementation of an adopted emergency response plan or emergency evacuation plan. Impacts to an adopted emergency response plan or emergency evacuation plan are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Impact Analysis:

The Project Site, particularly the staging area, is located in an area with environmental conditions partially conducive to wildland fires (e.g., dry vegetation). According to the Fire Hazard Severity Zone maps provided by the California Department of Forestry and Fire Protection (Cal Fire), the project site is located in a moderate to high-risk area for wildland fires. Operation of construction equipment on the during lead abatement activities has the limited potential to spark a fire. However, construction activities would implement BMPs which address fire prevention methods such as:

- restricting vehicles from driving or parking on dry vegetation during fire sensitive times of the year; and
- wetting dry construction areas before commencing activities, and wetting throughout the day, as appropriate.

Conclusion:

Although construction equipment has a minimal potential to spark a fire during construction activities, implementation of BMPs would substantially limit the potential for a wildland fire that exposes people or structures to a significant risk of loss, injury or death to occur. Impacts from wildland fires during implementation of the lead abatement activities are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

Geocon, 2023. *Draft Final Remedial Action Plan, Salmon Creek Sandblast Waste Abatement Project*. July 2023.

Cal Fire. 2023. *Fire Hazard Severity Zone Maps*. Available at: https://egis.fire.ca.gov/FHSZ/ (Accessed July 8, 2023).

10. HYDROLOGY AND WATER QUALITY				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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:			☒	
(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The State Water Resources Control Board and the Regional Water Quality Control Boards (collectively Water Boards) share authority to implement the Federal Clean Water Act (CWA, 33 U.S.C. §1251 et seq.) and California's Porter-Cologne Water Quality Control Act (California Water Code, Section 7). The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters.

The Water Boards enforce waste discharge requirements through National Pollutant Discharge Elimination System (NPDES) permits. The Porter-Cologne Act mandates the Regional Water Board to develop, adopt and implement a Basin Plan for the Region. The *Water Quality Control Plan for the California Regional Water Quality Control Board, North Coast Region*, prepared by the North Coast Regional Water Quality Control Board, is the master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in the Region.

The following are also applicable:

- The State Board published a resolution (SWRCB Resolution No. 88-63, as revised by Resolution No. 2006-0008) adopting policy regarding sources of drinking water where exceptions are provided for waters meeting certain criteria.

- The U.S. Environmental Protection Agency promulgated numeric water quality criteria for priority toxic pollutants and other water quality standards provisions to be applied to inland surface waters, enclosed bays and estuaries in California (California Toxics Rule, CTRs).

- A California Stormwater Construction General Permit is required for construction projects disturbing more than 1 acre. The legally responsible person is required to electronically file permit registration documents consisting of a notice of intent, risk assessment, site map, SWPPP, annual fee, and signed certification statement through the State Water Board's Storm Water Multi-Application and Report Tracking System.

ENVIRONMENTAL SETTING (BASELINE):

The project site is located entirely within the Big Salmon Creek watershed, which encompasses 13 square miles. The Big Salmon Creek watershed is bordered by the Albion River and Little River-Frontal Pacific Ocean watersheds to the north, and to the south by the Lower Navarro River and Little River-Frontal Pacific Ocean watersheds.

Little Salmon Creek flows into Big Salmon Creek approximately 600 feet east of the Salmon Creek Bridge, forming Salmon Creek, a 900-foot segment of tidally influenced stream that flows directly into the Pacific Ocean at Whitesboro Cove.

Wetlands are present in topographically low areas adjacent to Salmon Creek and within depressions fed by channelized drainages or subsurface seeps along terrace slopes. Smaller earthen ditches that convey run-off are also present along some of the dirt roads within the project area.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of hydrology and water quality effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance**.**

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

The hydrogeological conditions have been characterized through investigations completed as part of the project site investigations.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact Analysis:

The objectives of the proposed lead abatement include improving water quality conditions by removing lead from the soil thereby reducing the potential for contaminants to migrate from soil to water resources (e.g., groundwater, Little Salmon Creek).

Construction activities during implementation of lead abatement would not violate any water quality standards or water discharge requirements. A site-specific SWPPP would be prepared by a certified Qualified SWPPP Developer and implemented to ensure surface water bodies are not impacted during construction activities. Associated BMPs (e.g., soil stabilization, sediment control, tracking control, non-stormwater management, job site management, waste management and materials pollution control) would be implemented during construction to prevent runoff into surface water bodies.

The lead abatement activities could require dewatering where excavations intercept shallow groundwater and groundwater that could be contaminated with lead and zinc. Necessary permits for any dewatering activities would be obtained and followed and groundwater would be managed according to its contamination levels. If groundwater is found to be clean, the proposed project would comply with Order No. R1-2020-0006,

General NPDES No. CAG024902. If groundwater is found to be contaminated, the proposed project would comply with Order No. R1-2022-0013, General NPDES No. CAG911001.

The proposed project would be anticipated to add and replace more than 5,000 square feet of impervious surface for reconstruction of Spring Grove Road and improvements at the Spring Grove Road/SR 1 intersection. Therefore, the proposed project would be required to obtain a 401 Water Quality Certification and stormwater treatment would be required. The identification and implementation of specific post-construction treatment controls would be evaluated during the plans, specifications, and estimate (PS&E) phase and during the permitting phase. The treatment controls would address potential post-construction stormwater impacts by reducing pollutant loads in runoff prior to reaching receiving waters downstream (e.g., Pacific Ocean). Treatment controls, such as low-impact development measures and treatment BMPs, would be located and sized in accordance with the Caltrans design guidance and the Caltrans MS4 permit, prioritizing treatment types that infiltrate, harvest, reuse, and/or evapotranspire stormwater runoff. Stormwater treatment would be constructed along northbound SR 1, near Spring Grove Road. The design and calculations for post-construction stormwater treatment controls would be identified during the PS&E phase.

Overall, stormwater runoff would be managed in accordance with all applicable laws and regulations along with updates and amendments to the NPDES Permit identified previously, as needed.

Conclusion:

The proposed lead abatement activities are anticipated to improve surface water quality and groundwater quality and result in the overall reduction of contaminant mass permeating into surface and groundwater systems. Project activities would not violate any water quality standards, waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. Impacts are considered to be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impeded sustainable groundwater management of the basin?

Impact Analysis:

Groundwater would not be extracted as part of implementation of the lead abatement activities. It is acknowledged that the lead abatement activities could require dewatering where excavations intercept shallow groundwater and groundwater that could be contaminated with lead and zinc. Necessary permits for any dewatering activities would be obtained and followed and groundwater would be managed according to its contamination levels. If groundwater is found to be clean, the proposed project would comply with Order No. R1-2020-0006, General NPDES No. CAG024902. If groundwater is found to be contaminated, the proposed project would comply with Order No. R1-2022-0013, General NPDES No. CAG911001.

Any contaminated groundwater beneath the site would remain isolated and implementation of the lead abatement activities would not substantially interfere with the overall recharge of the groundwater basin because the overall footprint of the impervious surfaces in the project area would not change compared to existing conditions.

Conclusion:

Implementation of lead abatement activities would not substantially interfere with groundwater recharge of the groundwater basin. A less-than-significant impact is expected to occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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:

(i) result in substantial erosion or siltation on or off-site;

Impact Analysis:

A large portion of project area currently drains naturally to the Little Salmon Creek or Big Salmon Creek. Implementation of the proposed lead abatement activities would not substantially increase the paved surface area of the project area. Runoff from the project site would be managed in accordance with all applicable laws and regulations, with updates and amendments to the NPDES identified previously, as needed. Implementation of the SWPPP would ensure erosion or sedimentation does not occur on- or offsite during construction activities.

Conclusion:

Implementation of lead abatement activities would not result in any substantial changes to existing drainage patterns of the project area in a manner which would result in substantial erosion or siltation on- or offsite. Consequently, impacts are considered to be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite;

Impact Analysis:

A large portion of the project area currently drains naturally to the Little Salmon Creek or Big Salmon Creek. Implementation of the lead abatement activities would not substantially increase the paved surface area of project area nor substantially increase runoff. The existing, natural storm water controls at the Project Site are considered sufficient to prevent flooding and existing conditions would remain substantially similar after completion of lead abatement.

Conclusion:

Although the proposed lead abatement activities would create minor, temporary alterations to existing drainage patterns on the Project Site, existing drainage conditions would remain substantially similar after completion of lead abatement. Less than impacts related to flooding would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

(iii) create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or

Impact Analysis:

A large portion of the project area currently drains naturally to the Little Salmon Creek or Big Salmon Creek. Implementation of the lead abatement activities would not substantially increase the paved surface area of project area nor substantially increase runoff. The existing, natural storm water controls at the Project Site are considered sufficient to prevent flooding and existing conditions would remain substantially similar after completion of lead abatement.

Conclusion:

Although the proposed lead abatement activities would create minor, temporary alterations to existing drainage patterns on the Project Site, existing drainage conditions would remain substantially similar after completion of lead abatement. Less than impacts related to flooding would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

(iv) impede or redirect flood flows?

Impact Analysis:

A large portion of the project area currently drains naturally to the Little Salmon Creek or Big Salmon Creek. Implementation of the lead abatement activities would not substantially increase the paved surface area of project area nor substantially increase runoff. The existing, natural storm water controls at the Project Site are considered sufficient to prevent flooding and existing conditions would remain substantially similar after completion of lead abatement.

Conclusion:

Although the proposed lead abatement activities would create minor, temporary alterations to existing drainage patterns on the Project Site, existing drainage conditions would remain substantially similar after completion of lead abatement. Less than impacts related to flooding would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Impact Analysis:

The Project Site is susceptible to tsunamis or seiche inundation because of the project site's location near the Pacific Ocean. However, the project area has been susceptible to tsunamis or seiche inundation for many years and implementation of lead abatement activities are designed to reduce the potential risk of releasing pollutants (i.e., lead). Therefore, the proposed project would be considered a beneficial impact.

Conclusion:
Implementation of proposed lead abatement activities would occur in an area at risk to seiche or from tsunami inundation. However, the proposed lead abatement activities are designed to reduce the potential risk of releasing pollutants and, therefore, would be considered to result in a beneficial impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact Analysis:

Groundwater would not be extracted as part of implementation stormwater infrastructure improvements and thereby would not obstruct the implementation of a sustainable groundwater management plan. It is acknowledged that the lead abatement activities could require dewatering where excavations intercept shallow groundwater and groundwater that could be contaminated with lead and zinc. Necessary permits for any dewatering activities would be obtained and followed and groundwater would be managed according to its contamination levels. If groundwater is found to be clean, the proposed project would comply with Order No. R1-2020-0006, General NPDES No. CAG024902. If groundwater is found to be contaminated, the proposed project would comply with Order No. R1-2022-0013, General NPDES No. CAG911001.

Any contaminated groundwater beneath the site would remain isolated and implementation of the lead abatement activities would not substantially interfere with the overall recharge of the groundwater basin because the overall footprint of the impervious surfaces in the project area would not change compared to existing conditions.

Conclusion:

Implementation of proposed lead abatement activities would not violate any water quality standards or water discharge requirements identified in any water quality control plan or sustainable groundwater management plan.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Caltrans, 2023. *Water Quality Assessment Report for Salmon Creek Sandblast Waste Abatement Project*. February 2023.

11. LAND USE AND PLANNING				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The Mendocino County 2009 General Plan Development Element and Development Code (Article II - Zoning Districts and Allowable Land Uses) provide restrictions and regulations on land uses. The County's 2013 Zoning Map designates the land use of the project site as rangeland.

ENVIRONMENTAL SETTING (BASELINE):

The Mendocino County zoning map designates the land use of the Project Site as rangeland. Rangeland allows for and is appropriately retained for the grazing of livestock and which may also contain some timber producing areas.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of land use and planning resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of land use changes in or near the Project Site, no environmental studies relating to land use and planning were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Physically divide an established community?

Impact Analysis:

The proposed lead abatement activities would not occur in an area exhibiting an established community. The project area encompasses a rural residential area. The lead abatement activities would not have the ability to physically divide an established community.

Conclusion:

The lead abatement activities would not have the potential to physically divide an established community because the activities would not occur in an established community. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

The lead abatement activities would not conflict with any land use plan, policy, or regulation.

Conclusion:

The lead abatement activities would not have the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project Site adopted for avoiding or mitigating an environmental effect. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

12. MINERAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting mineral resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is located along the coastline near the community of Albion in Mendocino County. The site has no history of mining activities.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of mineral resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of mineral resources in or near the Project Site, no environmental studies relating to mineral resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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?

Impact Analysis:

Activities associated with the lead abatement would not have the ability to affect the availability of any known mineral resources.

Conclusion:

The proposed lead abatement activities would not prevent access to any potential mineral resources. Therefore, no impacts would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

Activities associated with the lead abatement would not have the ability to affect the availability of any known mineral resources.

Conclusion:

The proposed lead abatement would not prevent access to any potential mineral resources. Therefore, no impacts would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

13. NOISE				
Would the project result in:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

There are no ordinances, codes, or policies that pertain to the reduction of construction-related noise that would be applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is a rural, primarily undeveloped area in the Mendocino County. Existing ambient noises in the area of the Project Site is dominated by vehicle traffic along SR 1.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

For purposes of this analysis, noise effects may be considered significant if project activities would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project Site in excess of Mendocino County noise level standard of 50 dBA, or result in generation of excessive groundborne vibration or groundborne noise levels.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

The Federal Highway Administration (FHWA) developed the Roadway Construction Noise Model (RCNM), which has become the industry-accepted standard model for calculating construction noise levels at specific receptor locations. Model inputs include the type and number of pieces of heavy construction equipment, their usage factors, distance to a receptor, and estimated shielding reduction (if any). The noise modeling for the proposed corrective measures were analyzed according to default construction equipment list from the air quality impact analysis for the Proposed Project (see Attachment C). To reflect a conservative analysis, a reasonable worst-case scenario was modeled, assuming that each piece of modeled equipment would operate simultaneously at a reasonable distance from one another at the nearest possible locations to each modeled receptor. The modeled receptor locations represent the closest existing sensitive receptors to the Project Site.

For exterior noise, Mendocino County establishes a noise level criterion of 50 dB L_{50} for residential uses. The County uses L_{50} for regulating noise levels. L_{50} is the average equivalent sound level over a 30-minute period, with a penalty added for noise during the nighttime hours of 10:00 p.m. to 7:00 a.m. During the nighttime period, a 10 penalty dB is added to L_{50} to take into account the decrease in community background noise between the hours of 10:00 p.m. to 7:00 a.m. However, construction activities associated with implementing the proposed lead abatement activities would occur only during daytime hours and would not be subject to the noise penalty applied to L_{50}. Therefore, this analysis uses L_{eq}, the equivalent continuous sound level in decibels measured over a stated period of time (typically one hour), for the purposes of measuring project-generated noise.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would result in:

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact Analysis:

The proposed project would use heavy equipment for excavating lead contaminated soils. In addition, trucks would be used to transport materials to the Project Site. Implementation of the lead abatement activities would occur over 4 months during daytime hours which meets the Mendocino County requirement for construction activities to occur during normal work hours of the day and to provide relative quiet during the more sensitive evening and early morning periods (Mendocino County Municipal Code, Title 20, Division I, Appendix C).

During implementation of the lead abatement activities, noise from construction activities may intermittently dominate the noise environment in the immediate area. Noise generated by construction activities would be a function of the noise levels generated by individual pieces of construction equipment, the type and amount of equipment operating at any given time, the timing and duration of construction activities, and the proximity of nearby sensitive receptors.

Construction noise would primarily result from the operation of heavy construction equipment and arrival and departure of heavy-duty trucks. Construction noise levels will vary on a day-to-day basis during each phase of construction depending on the specific task being completed. Table 13.1 summarizes maximum noise levels produced by construction equipment that is commonly used on roadway construction projects. Construction equipment would be expected to generate noise levels ranging from 70 to 90 dBA at a distance of 50 feet, and noise produced by construction equipment would be reduced over distance at a rate of about 6 dBA per doubling of distance. Existing topographic conditions on the Project Site would provide additional noise reduction through shielding and soft site acoustic spreading.

TABLE 13.1
MAXIMUM NOISE LEVELS FROM CONSTRUCTION EQUIPMENT

Equipment	Maximum Noise Level (dBA at 50 feet)
Bulldozers	85
Heavy Trucks	88
Pneumatic Tools	85
Backhoe	80
Dump Truck	84
Excavator	85

FHWA's Roadway Construction Noise Model (RCNM) was used to calculate the maximum average noise levels anticipated during each phase of construction. RCNM includes representative sound levels for the most common types of construction equipment and the approximate usage factors that were developed based on an extensive database of information gathered during the construction of the Central Artery/Tunnel Project in Boston, Massachusetts (CA/T Project or "Big Dig"). The usage factors represent the percentage of time that the equipment would be operating at full power. Vehicles and equipment anticipated during each phase of construction were input into RCNM to calculate noise levels, including the maximum noise levels, from the different phases of construction. The maximum noise level assumes all equipment are running at the same time. Table 13.2 summarizes maximum average noise levels at various distances from construction activity.

TABLE 13.2
MAXIMUM HOURLY AVERAGE NOISE LEVELS

Distance from Construction Equipment	Maximum Noise Level (L_{eq}, dBA)
50	84.9
100	78.9
150	75.4
200	72.9
250	71.0

The Mendocino County General Plan uses L_{50} for regulating noise levels in the County. However, construction activities associated with implementing the proposed lead abatement activities would occur only during daytime hours and would not be subject to the noise penalty applied to L_{50}. Therefore, this analysis uses L_{eq} for the purposes of measuring noise generated during construction activities and is considered relevant and appropriate. L_{eq} is the equivalent continuous sound level in decibels, equivalent to the total sound energy measured over a stated period of time (typically one hour).

Five residences, which are considered noise sensitive receptors, are located within 300 feet of the Project Site. It is noted that one of the residences is located inside the area for lead abatement activities. Based on the proximity of residences to proposed lead abatement activities, temporary noise levels during construction activities are anticipated to be noticed at nearby receptors.

As identified and described in the Remedial Action Plan, construction activities would employ noise-reducing construction practices to control and monitor noise resulting from work activities such that noise does not exceed 86 dBA L_{max} (maximum noise level resulting from a single event) at 50 feet from the job site from 9 p.m. to 6 a.m. In addition, the following measures would be implemented to further limit noise:

- Limit operation of construction equipment to daytime hours;
- Unnecessary idling of internal combustion engines should be prohibited;
- Stationary equipment, such as compressors and generators, would be shielded and located as far away from residences as practical; and
- Locate equipment and materials storage sites as far away from residential uses as practicable.

Even though lead abatement activities would likely result in noise levels exceeding Mendocino County noise level criterion of 50 dB L_{50} for residential uses, construction activities would occur during normal work hours of the day, would employ noise reducing measures to limit noise levels to below 86 dBA L_{max}, and would be temporary in nature (occurring for 4 months). In addition, the residence closest to the construction activities is a vacation residence and, therefore, not considered a primary residence where people would not have the opportunity to reside elsewhere during the increased noise levels. For these reasons, the proposed project would not result in generating a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by Mendocino County.

Conclusion:

The proposed project would limit construction activities to normal work hours of the day and implement noise reducing measures to limit noise levels to below 86 dBA L_{max} at nearby residences. In addition, noise-generating activities would be short-term and temporary. Therefore, the proposed project would have a less than significant impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Generation of excessive groundborne vibration or groundborne noise levels?

Impact Analysis:

Implementation of proposed lead abatement activities would require the use of heavy construction equipment (e.g., backhoe, dozer, excavator, rollers) at the Project Site. Groundborne vibration or noise generated by the use of these heavy construction equipment could be perceptible and cause disturbances at nearby residences during operation of heavy equipment. However, these vibration effects would be short-term and intermittent and would cease once lead abatement activities complete.

Conclusion:

Construction equipment used during proposed lead abatement activities could generate groundborne vibration discernable at the nearby residences. The groundborne vibration activities would be short-term and temporary in nature and would not result in any long-term sources of groundborne vibration or noise. A less-than-significant impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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?

Impact Analysis:

The Project Site is not located within the boundaries of an airport land use plan. The closest airport to the site is Little River Airport which is located approximately 3 miles to the north. Based on the distance of the project site from the Little River Airport, the project site is located outside of any established safety zones and influence area. In addition, the proposed project would not involve the construction of any structures that would house people.

Conclusion:

The proposed lead abatement activities would not the potential to expose people residing or working in the project area to excessive noise levels generated by a nearby airport or airfield. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Department of Transportation. 2023. *Revised Air Quality and Noise Analysis for the Salmon Creek Lead Abatement Project Memorandum.* February 15, 2023.

14. POPULATION AND HOUSING				
Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting population and housing resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

The Mendocino County zoning map designates the land use of the Project Site as rangeland. Rangeland allows for and is appropriately retained for the grazing of livestock and which may also contain some timber producing areas. The Project Site is primarily undeveloped with the exception of rural residences. One residence is located inside the proposed project area; however, no housing development is proposed to be located at or near the project site. The Project Site is expected to remain designated for rangeland uses as the proposed lead abatement activities would not prevent future residential uses on the site itself.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of population and housing resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the nature of the proposed project activities (infrastructure improvements), no environmental studies relating to population and housing resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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

Impact Analysis:

Implementation of the proposed lead abatement activities would not prevent future development of housing on adjacent properties. The lead abatement is intended to remove or substantially reduce contaminated soils on the project site. This improvement in itself would not indirectly induce unplanned population growth in the area.

Conclusion:

The proposed project would not have the potential to induce substantial unplanned population growth in the area, either directly or indirectly.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impact Analysis:

Implementation of the lead abatement is intended to remove or substantially reduce contaminated soils on the project site. It is acknowledged that there is one existing residence inside the lead abatement activity area. However, these activities would not require removing any existing people or housing.

Conclusion:

The proposed project would not displace substantial numbers of existing people or housing.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

15. PUBLIC SERVICES				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting public services resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is designated as rangeland uses and is located in a primarily undeveloped, rural area of Mendocino County.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of public services resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impact of the Project Site to public services resources, no environmental studies relating to public services resources were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 following public services:

Fire protection?

Impact Analysis:

The closest fire station to the Project Site is Albion-Little River Fire Department Station 811, located approximately 1-¼ miles away at 32600 Albion Ridge Road. Potential demands on fire protection services may increase slightly during the construction period as a result of unforeseen events related to the scope of work. However, ongoing adherence to procedures and practices identified in the proposed project's Health and Safety Plan would reduce the potential for incidents to occur that would require a fire district response.

Conclusion:

Ongoing adherence to procedures and practices identified in the proposed project's Health and Safety Plan would reduce the potential for incidents to occur that would require response from fire protection services. After completion of lead abatement activities, the proposed project would not cause an increase in demand on fire protection, as compared to the current demand.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

Police protection?

Impact Analysis:

The closest police station to the Project Site is located approximately 19 miles in the City of Fort Bragg. In addition, the closest sheriff station is located 46 miles distant in the City of Ukiah. Potential demands on law enforcement or emergency response services could increase slightly during the construction period as a result of unforeseen events or circumstances. However, risks to human health and safety would be minimized through ongoing adherence to procedures and practices identified in the proposed project's Health and Safety Plan.

Conclusion:

Ongoing adherence to procedures and practices identified in the proposed project's Health and Safety Plan and existing onsite security measures would reduce the need for police protection services. After completion of lead abatement activities, the project would not cause an increase in demand on police protection, as compared to current demand.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

Schools?

Impact Analysis:

The closest schools to the Project Site include Albion Elementary School located approximately 4 miles from the project site. The proposed project would not result in an increase in population or associated increase in demand on these schools.

Conclusion:

Implementation of lead abatement would not create a demand for existing or new school facilities. No impact to school facilities would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

Parks?

Impact Analysis:

The nearest public park is located along the coastline either near Navarro Point located to the south or the Van Damme State Park located to the north. The proposed project would not result in an increase in population or associated increase in demand on parks.

Conclusion:

Implementation of lead abatement would not create a demand for existing or new park facilities. No impact to park facilities would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

Other public facilities?

Impact Analysis:

The closest hospital to the Project Site is the Adventist Health Mendocino Coast, located approximately 19 miles to the north at 700 River Drive in Fort Bragg. Construction activities could result in a slight increase in demands for services at the medical center. The potential for incidents requiring medical attention would be minimized through adherence with the proposed project's Health and Safety Plan.

Conclusion:

Ongoing adherence to procedures and practices identified in the proposed project's Health and Safety Plan would reduce the need for other public facilities and services. After lead abatement activities complete, the project would not cause an increase in demand on other public facilities and services, as compared to current demand.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

16. RECREATION				
	Potentially Significant Impact	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards relating to protecting recreation resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

Navarro Point Preserve and Scenic Trail is located approximately 2 miles to the south. Navarro Point provides a 56-acre preserve owned and managed by the Mendocino Land Trust. Navarro Point offers views of the Mendocino Coast along a 1.2-mile coastal trail that loops around the preserve.

Van Damme State Park is located approximately 7 miles to the north. Van Damme provides a scenic beach, a lush fern-filled forest, and year-round camping. Visitors can hike, jog, or bicycle the Fern Canyon Scenic Trail beside Little River and learn about the historical resources connected with the redwood lumber industry.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of recreational resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of impacts to recreational resources in or near the Project Site, no environmental studies relating to recreational resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

a. Would the project 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?

Impact Analysis:

The nearest park to the Project Site is Navarro Point Preserve, located to the south of the project site. Implementation of proposed lead abatement would not directly increase the permanent resident population in the area because no habitable structures are planned as part of the project.

Conclusion:

The proposed project would not increase the use of existing parks, other recreational parks, or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. No impact to the use of existing neighborhood and regional parks or other recreational facilities would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. Does the project include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact Analysis:

The Project Site does not contain any existing recreational facilities. Implementation of proposed lead abatement would not involve or require construction of any recreational facilities.

Conclusion:

The proposed project would not construct or cause the need for construction of additional recreational facilities. No impact to existing or need for additional recreational facilities would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Federal laws and regulations: Resource Conservation and Recovery Act (RCRA) Title 42 United States Code Subtitle C and 40 Code Federal Regulations (CFR) Parts 260-279. More specifically, transporters of hazardous waste are governed by 40 CFR part 263. RCRA gives EPA the authority to control hazardous waste from the generation, transportation, treatment, storage, and disposal of hazardous waste. The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration regulates the transport of hazardous materials through Title 49 of the Code of Federal Regulations, Subchapter C.

State laws and regulations: Hazardous Waste Control Law (Health and Safety Code (HSC) Chapter 6.5) and 22 California Code of Regulations (CCR). The law establishes regulations and incentives which ensure that the generators of hazardous waste employ technology and management practices for the safe handling, treatment, recycling, and destruction of their hazardous wastes prior to disposal. Article 6 of HSC Chapter 6.5 discusses the transportation of hazardous waste. California Vehicle Code: Divisions 2, 6, 12, 13, 14, 15 also apply to transportation of hazardous materials.

ENVIRONMENTAL SETTING (BASELINE):

Spring Grove Road provides the main access route into the Project Site. Spring Grove Road intersects with Highway 1 approximately ½-mile north of the work area. The Mendocino County General Plan identifies Highway 1 as a major transportation route serving most trips made along the Mendocino coast by residents, visitors, and local commerce and industry. Highway 1 in the vicinity of the Project Site has an average daily traffic volume of between 3,000 and 3,300 vehicles.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of transportation resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance. Level of Service (LOS) has been the standard by which transportation impacts of major developments and changes to roads were measured. LOS was formally defined in the 1965 Highway Capacity Manual as a "qualitative measure of the effect of a number of factors, which include speed and travel time, traffic interruptions, freedom to maneuver, safety, driving comfort and convenience, and operating cost". It is better understood today that LOS does not accurately reflect vehicle travel as it only focuses on individual local intersections and roadway segments and not on the entire vehicle trip. In 2013, the State of California passed Senate Bill (SB) 743 which required the Office Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. LOS was replaced with Vehicle Miles Traveled (VMT) as "the most appropriate metric of a project's potential transportation impacts". VMT data are used primarily by transportation agencies, environmental agencies, and consultants to perform a variety of functions such as allocating resources, estimating vehicle emissions, computing energy consumption, and assessing traffic impacts.

Section 15064.3(b) of the CEQA Guidelines states the following:

(b) Criteria for Analyzing Transportation Impacts.

(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impact to transportation resources in or near the Project Site, no environmental studies relating to transportation resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

Impact Analysis:

The proposed lead abatement activities would not affect public roadways in the long-term because these activities would not substantially affect the overall circulation system. The proposed project would add some traffic to roadways during the 4-month construction period due to delivery of materials and supplies to the site, workers traveling to and from the site, and hauling excavated soils and backfill from/to the site. The proposed project would not have any long-term effects on congestion levels.

During construction, periodic movement of heavy equipment to and from the project site would occur using Highway 1. Excavated contaminated soils would be hauled to either the Kettleman Hills or Clean Harbors Buttonwillow landfill. Heavy haul trucks would travel along Spring Grove Road to Highway 1, then south to Highway 128, then east to Highway 101, then south to either landfill located near Interstate 5. To transport the lead contaminated soils, it is anticipated that approximately 478 heavy truck trips would occur over the 4-month construction period (approximately 6 trips per day). Implementation of the lead abatement activities would also generate infrequent truck trips during construction activities. The average daily trips generated by the lead abatement activities (6 trips) would account for less than one percent of the average daily trips on Highway 1 in the vicinity of the Project Site (between 3,000 and 3,300 vehicles). These truck trips would also be intermittent; therefore, the construction activities would not substantially increase the traffic on any public street system.

Traffic control measures would be implemented along Highway 1 during lead abatement activities adjacent to the bridge and for active truck access north and south of the bridge. Specific details of the transportation and traffic control plan will be presented in the Remedial Design Implementation Plan (RDIP). Traffic controls could involve lane closures and construction area signs. Specifically, construction area signs could be furnished, installed, maintained, and removed when no longer required in accordance with the Section 12, *Temporary Traffic Control*, of the *2018 Caltrans Standard Specifications*. A traffic control system will consist of closing traffic lanes in accordance with the provisions of Section 12, of the *2018 Caltrans Standard*

Specifications. When lane closures are made for work periods, all components of the traffic control system, would be removed from the travel way and shoulder at the end of each work period.

There are no bike lanes in the proposed project area. In addition, there is no public transit (e.g., bus service) provided in the project area. The temporary increase in construction traffic during implementation of proposed lead abatement activities would not affect any program, plan, ordinance or policy relating to these transportation facilities.

Conclusion:

The proposed project would not incorporate any activities, short-term or long-term, that would have the ability to conflict with any program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities in the project area.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact Analysis:

Vehicle miles traveled (VMT) is a measure used in transportation planning for a variety of purposes. It measures the amount of travel for all vehicles in a geographic region over a given period of time, typically a one-year period. VMT is calculated by adding all the miles driven by all the cars and trucks on all the roadways in a region. This metric plays an integral role in the transportation planning, policy-making, and revenue estimation processes due to its ability to indicate travel demand and behavior. VMT may also be used to evaluate conformity assumptions, adjust travel demand forecasts, and identify pavement maintenance needs. Implementation of lead abatement activities would not generate additional long-term vehicle trips or change circulation patterns in the project area.

Conclusion:

The proposed lead abatement activities would not increase long-term vehicle miles traveled levels from/to the Project Site consistent with Section 15064.3(b) of the CEQA Guidelines. There would be no impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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)?

Impact Analysis:

The proposed project involves removal of lead-contaminated soils. The proposed lead abatement activities would not contain a design feature or incompatible use that would substantially increase traffic hazards because the activities would not alter the public roadways system. The current intersection at Highway 1 and Spring Grove Road is stop controlled for safe traffic movements to/from the Project Site and this condition would not change.

Conclusion:

Implementation of the lead abatement activities would not include any design features or incompatible uses which would substantially increase hazards. No impacts related to increased hazards due to a geometric design feature or incompatible uses would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

d. Result in inadequate emergency access?

Impact Analysis:

The proposed lead abatement activities would not affect emergency access to/from the Project Site in the long-term because these activities would not substantially change the overall circulation system on- and offsite. In addition, all construction equipment would be located and stored onsite and would not have the potential to block access roads. Traffic control measures would be implemented along Highway 1 during lead abatement activities adjacent to the bridge and for active truck access north and south of the bridge. Specific details of the transportation and traffic control plan will be presented in the RDIP.

Conclusion:

Emergency access to/from the Project Site would not result in long-term inadequate emergency access to surrounding area with implementation of lead abatement activities. Short-term impacts to access in the project area would be managed in accordance with a traffic control plan. Less-than-significant impacts related to inadequate emergency access would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

Caltrans, 2023. 2017 Traffic Volumes: Route 1. Available at: https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017/route-1. Accessed April 20, 2023.

18. TRIBAL CULTURAL RESOURCES				
Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Tribal cultural resources are defined in PRC Div. 13 Section 21074. California Assembly Bill 52 (AB52) specifies that any project for which a Notice of Preparation, Notice of Mitigated Negative Declaration or Notice of Negative Declaration is filed on or after July 1, 2015, the Lead agency must provide formal notification within 14 days of determining that an application for a project is complete or of a decision to undertake a project to the designated contact or tribal representative of the affiliated California Native American tribes. The tribe that is traditionally and culturally affiliated to the geographic area where a project is located must have requested that the lead agency in question provide notification to the tribe (PRC 21081.3.1).

If remains are found on Site, the County Coroner will make the determination of origin and disposition, pursuant to Public Resources Code (PRC) § 5097.98. If the remains are determined to be Native American, the Coroner would notify the NAHC (per Health and Safety Code 7050.5(c)) The NAHC would identify and notify the person(s) who might be the most likely descendent, who would make recommendations for the appropriate and dignified treatment of the remains (PRC Div. 5 section 5097.98). The descendants shall complete their inspection and make recommendations for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

ENVIRONMENTAL SETTING (BASELINE):

Ethnographic literature indicates that the proposed project lies within the traditional tribal territory of the Northern Pomo, surrounded by an area that was occupied by a distinct linguistic and cultural subgroups of the Yuki, Huchnom and Coast Yuki to the north, the Wappo to the southeast, and Central, Eastern and Southern Pomo to the south. A cultural resource study of the project site began with a search of Caltrans' Cultural Resource Database and cultural resource files at Caltrans District 01 office in Eureka, CA, which were reviewed for previous field surveys and previously recorded cultural resources. In addition, a records search at the Northwest Information Center of the California Historical Resources Information System at Sonoma State University in Rohnert Park, was conducted in 2015. The records search documented all previously recorded archaeological sites and prior cultural resource studies conducted within a ¼ mile radius of the area of potential effect (APE) associated with the remediation activities. A total of fifteen previous studies were conducted within the APE between 1976 and 2015. Other archives and information sources were consulted and included but were not limited to the following sources:

- National Register of Historic Places (NRHP);
- California Register of Historic Resources (CRHR);
- California Inventory of Historic Resources (1976);
- Directory of Properties in the Historic Property Data File (HPDF);
- Caltrans Bridge Inventory;
- Caltrans As-Built Plans and previous road construction files;
- Local inventories;
- Historical topographic maps;
- GLO and/or Rancho Plat maps;
- Other historical maps (e.g., Metsker's maps, Sanborns);
- Government documents (Construction plans, Census records, Voter's Registers, etc.); and
- On-line newspaper archives (California Digital Newspaper Collection, Newspapers.com, Newspaper archive)

The records search identified six previously recorded archaeological and built environment cultural resources within the APE including:

- Salmon Creek Bridge,
- Beach shack vacation residence,
- Caretaker's residence,
- Historic-era townsite of Whitesboro,
- Abandoned segments of historical State Route 1, and
- Remains of the mid-20th Century Aero Stud Sawmill.

The Native American Heritage Commission (NAHC) was contacted on September 9, 2020, to request a search of their sacred land files within a ¼ mile radius of the APE. In a letter dated September 14, 2020, the NAHC responded that the sacred land file search was negative and provided a list of Native American tribes and individuals who may have knowledge of cultural resources in the project area.

DTSC complied with the 2014 Assembly Bill 52 (AB52). DTSC provided written notification to tribes on the Tribal Consultation List from the NAHC regarding the proposed project on September 29, 2023. The notice included a brief project description, project location, and lead agency's contact information. DTSC did not receive interest from any Tribal governments and, therefore, did not consult with any Tribe prior to release of the CEQA document for the proposed project. It is noted that Caltrans initiated consultation with the Sherwood Valley Rancheria of Pomo in September 2020 and consultation is still ongoing.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

Tribal cultural resources are defined as either 1) sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or listed in a local register of historical resources or 2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, is a tribal cultural resource (OPR, 2017).

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

A pedestrian survey of this project APE and surrounding area was previously conducted in 2013 and 2014 that identified the six cultural resources identified above. A field survey conducted on March 29, 2021, located the six previously recorded resources and found the condition of these resources the same as previously reported. No new resources were identified during this field visit. After the addition of three parcels to the APE being considered for staging areas, additional field survey was undertaken on April 12th, 13th, and 20th, 2023 to cover these three parcels. No new resources were identified.

The entire APE was covered walking a series of transects spaced five to ten meters apart. Areas with poor ground visibility due to heavy vegetation were cleared every five meters to inspect the ground surface. Steep slopes were surveyed where feasible. A research plan was created to determine the extent and integrity of archaeological deposits within the sites of the Aero Stud Sawmill and the historic-era townsite of Whitesboro. Historic-era documentation, maps, and photographs were consulted to determine which areas of the APE were likely to contain subsurface deposits. Steep terrain and dense vegetation limited the scope of the subsurface testing as well as limitations required by the landowner, which did not allow for vegetation clearing nor the use of mechanical equipment.

Archaeological testing was conducted using shovel probes, control units and auger holes, from May 19 to 22, 2014, June 18, 2014, and December 9, 2014. In 2021, additional subsurface testing was conducted to cover the APE. Due to the size of the Whitesboro townsite and access restrictions by the landowner, only the areas to be directly impacted by the proposed project were tested. The results of subsurface testing allowed both sites to be evaluated against the federal and state criterion for potential eligibility to the NRHP and CRHR.

During subsurface testing, evidence of a prehistoric shell midden was found beneath the town of Whitesboro. Sampling of the site determined the site deposits were undisturbed, likely due to a layer of gravel put in place to provide a solid base before construction of historic-era buildings. Because the prehistoric site was below the level of lead mitigation, and because a research design had not been developed for this previously unknown site, this prehistoric deposit received only cursory investigation at the time. The project site was assumed to be eligible to the NRHP and a vertical environmental site assessment (ESA) was designated to protect this site from lead abatement activities.

IMPACT ANALYSES AND CONCLUSIONS:

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Impact Analysis:

There are no known cultural resources that have been identified as a tribal cultural resource as defined by AB52. There are, however, cultural resource sites that are of concern to California Native American tribes within the Project footprint. As identified in the Environmental Setting (Baseline), the Project Site contains six previously recorded archaeological and built environment cultural resources.

On September 29, 2023, DTSC, following the guidelines of AB52, sent letters to seven tribes describing the project and asking if there were any concerns or issues regarding cultural resources that may be affected by the proposed project. No tribal concerns nor cultural resources were identified during that time. Caltrans also conducted consultation, as mentioned previously, with the Sherwood Valley Rancheria of Pomo noting they wanted to be consulted with regularly regarding the project. This has been occurring with Caltrans and will continue for the life of the project.

If there is an inadvertent discovery of a cultural resources or tribal cultural resource occurs during construction activities, a Post Review Discovery Plan developed by Caltrans in consultation with the SHPO and the consulting tribes would be implemented. Specifically, in the event of discovery of human remains during ground-disturbing activities, work within 25 feet of the discovery shall stop immediately and the County Coroner shall be notified to determine its origin. The County Coroner would determine disposition within 48 hours. If the remains are Native American, the County Coroner would be responsible for contacting the NAHC within 24 hours. The NAHC would identify and notify the person(s) who might be the most likely descendent, who would make recommendations for the appropriate and dignified treatment of the remains (PRC Div. 5 section 5097.98). The descendants shall complete their inspection and make recommendations for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

In the event of discovery of potential cultural or archaeological resources, construction activities would be immediately suspended in the immediate area and surrounding 25 feet along with contacting and informing the DTSC Project Manager (Dennis Palacios at (510) 540-2432; Dennis.Palacios@dtsc.ca.gov). After discussion with their Tribal Chairperson or respective Cultural Resources Managers or Tribal Historic Preservation Officers and in collaboration with DTSC (including the Office of Environmental Equity) and the property owner, any measures deemed necessary to record and/or protect the cultural or archaeological resource(s) would be implemented.

Conclusion:

The proposed project would not include the demolition, elimination, or manipulation of a known tribal cultural resource. In addition, the proposed project includes measures that would be implemented if discovery of unknown tribal cultural resource were uncovered during construction activities. The proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource and impact-s would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

The Project Site contains six previously recorded archaeological and built environment cultural resources which are both historic and prehistoric. Each of these cultural resources would be protected from project impacts with establishment of vertical Environmentally Sensitive Areas (ESAs).

On September 29, 2023, the DTSC formally notified seven tribes identified in the NAHC listing. By November 27, 2023, none of the tribal Governments responded or did not respond to the AB52 Consultation letter and requested consultation.

Although the tribes did not identify any known tribal cultural resources during AB52 consultation efforts, that may be affected by the proposed project, the prehistoric deposit identified during testing qualifies as a tribal cultural resource. This resource would be protected from impact by establishment of an ESA prohibiting access. The ESA will be directed by an ESA Action Plan which requires monitoring of the ESA during construction. It is acknowledged that there is potential for unknown tribal cultural resources to be affected during ground disturbance activities. A Post Review Discovery Plan has been developed to establish protocols and decision thresholds for post-review discoveries during construction. Specifically, if tribal cultural resources are discovered during project-related activities, work would stop in that area until a qualified archaeologist or appropriately licensed professional can assess the significance of the find and, if necessary, develop appropriate response measures in consultation with the DTSC and other agencies and Native American representatives, as appropriate. As previously stated, no information regarding the presence of known tribal cultural resources has been provided to the DTSC from the contacted tribes.

Conclusion:

As previously identified, tribal cultural resources at the Project Site that could be affected by the proposed project would be protected by establishing ESAs, and implementation of the Post Review Discovery Plan would reduce impacts to unknown tribal cultural resources during excavation activities, impacts would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

Governor's Office of Planning and Research (OPR). 2017. Technical Advisory, AB52 and Tribal Cultural Resources in CEQA. June 2017.

19. UTILITIES AND SERVICE SYSTEMS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting utilities and service systems resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

Water and wastewater service at the Project Site are provided by groundwater wells and septic systems.

Pacific Gas and Electric (PG&E) provides electric and natural gas service to the Project Site.

Routine facility operations-related solid waste collection and disposal is provided by Redwood Waste Solutions.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of utilities and service systems resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impacts to utilities and service systems resources in or near the Project Site, no environmental studies relating to utilities and service systems resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?

Impact Analysis:

Proposed lead abatement activities would not create the need for or result in the construction of new or expanded water or wastewater treatment, electric power, natural gas, or telecommunications facilities. The project is intended to improve soil conditions in the project area, specifically by substantially reducing lead in soils.

Conclusion:

Activities associated with the proposed project would not require new or expanded water or wastewater treatment, electric power, natural gas, or telecommunications facilities. In addition, lead abatement activities would be designed to improve project area soil conditions.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact Analysis:

Implementation of lead abatement activities would require approximately 4 months to complete. The primary source of water required during construction activities (e.g., dust suppression) would be supplied by water transported to the Project Site by water trucks.

Conclusion:

Sufficient water supplies from existing resources are available to serve the needs of construction activities during the anticipated 4-month construction period. The lead abatement would not create long-term, future demand for water supply beyond existing conditions. Impacts to water supplies would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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?

Impact Analysis:

Implementation of lead abatement activities would not generate wastewater that would require a wastewater treatment provider. Wastewater generated during equipment decontamination activities, if any, would be containerized, profiled, and disposed at an appropriate offsite facility.

Conclusion:

Construction activities associated with lead abatement activities would not create a demand for wastewater treatment at any wastewater treatment provider. No impact to a wastewater treatment provider would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

Removal of lead-contaminated soils would be required as part of the proposed project. Specifically, the excavation activities would generate approximately 6,900 cubic yards of lead-contaminated soil that would be disposed at a permitted landfill. Excavated soil would be stockpiled for characterization testing based on landfill specific acceptance criteria. Soil that requires California Class I hazardous waste disposal would be transported to landfill facilities in Kings and/or Kern Counties. Soil that requires Class II non-hazardous waste disposal would be transported to accepting landfill facilities in Northern California. The California Class I landfill would include either the Waste Management Kettleman Hills Hazardous Waste Facility, located near Kettleman City, or the CleanHarbors Buttonwillow Landfill Facility, located in Buttonwillow.

The Kettleman Hills and Buttonwillow landfills have a maximum permit capacity of 10.7 and 13.25 million cubic yards, respectively. Each of these facilities have sufficient permitted capacity to receive the anticipated 6,900 cubic yards of lead-contaminated soil; however, the capacity to accept would be confirmed in advance of transport to either facility. Therefore, the proposed project would not result in generating solid waste in excess of the capacity of local infrastructure (i.e., landfills).

Conclusion:

Solid waste generated by implementation of the lead abatement activities would require the service of landfills. Contaminated soils would be transported to either a Class I or Class II landfill with confirmation that each facility has sufficient capacity to accept in advance of transportation. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact Analysis:

Implementation of lead abatement activities would generate approximately 6,900 cubic yards of lead-contaminated soil that would be disposed at a permitted landfill. Excavated soil would be stockpiled for characterization testing based on landfill specific acceptance criteria. Soil that requires California Class I hazardous waste disposal would be transported to landfill facilities in Kings and/or Kern Counties. Soil that requires Class II non-hazardous waste disposal would be transported to accepting landfill facilities in Northern California. The California Class I landfill would include either the Waste Management Kettleman Hills Hazardous Waste Facility, located near Kettleman City, or the CleanHarbors Buttonwillow Landfill Facility, located in Buttonwillow.

Disposal of lead-contaminated soil would comply with all federal, state, and local statues and regulations related to solid waste including, but not limited to, characterization, storage, labeling, transport, and disposal.

Conclusion:

Disposal of lead-contaminated soil would comply with all federal, state, and local statues and regulations related to solid waste. Therefore, no impacts related to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

CalRecycle. 2023. SWIS Facility/Site Activity Details. Available at: https://www2.calrecycle.ca.gov/SolidWaste/Site/Search. Accessed June 12, 2023.

20. WILDFIRE				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting wildfire resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

State Responsibility Areas are boundaries adopted by the Board of Forestry and Fire Protection and are areas where the California Department of Forestry and Fire (CAL FIRE) has a financial responsibility for fire suppression and prevention. Review of the Fire Hazard Severity Zone maps provided by the CALFIRE, the project site is located in a moderate to high-risk area for wildland fires.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of wildfires resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impacts to wildfire resources in or near the Project Site, no environmental studies relating to wildfire resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact Analysis:

Please refer to the analysis provided in Section 9(f) of this Initial Study.

Conclusion:

Please refer to the conclusion provided in Section 9(f) of this Initial Study.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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?

Impact Analysis:

The Project Site, particularly the staging area, is located in an area with environmental conditions conducive to wildland fires (e.g., dry brush). Operation of construction equipment during lead abatement activities has the limited potential to spark a fire. However, construction activities would implement BMPs which address fire prevention methods such as:

- restricting vehicles from driving or parking on dry vegetation during fire sensitive times of the year; and
- wetting dry construction areas before commencing activities, and wetting throughout the day, as appropriate.

Conclusion:

Although construction equipment has a minimal potential to spark a fire during lead abatement activities, implementation of BMPs would substantially limit the potential for a wildland fire that exposes people or structures to a significant risk of loss, injury or death to occur. Impacts from wildland fires during implementation of the lead abatement activities are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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?

Impact Analysis:

Implementation of lead abatement activities would not require the installation or maintenance of associated infrastructure (e.g., fuel breaks, emergency water sources, power lines, other utilities) that could exacerbate fire risk or could result in temporary or ongoing impacts to the environment. The lead abatement activities may require construction of temporary access roads of compacted clean soil or imported clean gravel to facilitate access to work areas. However, the temporary access roads would overall reduce wildfire risk during the implementation of stormwater infrastructure improvements by incorporating soil or gravel.

Conclusion:

The proposed lead abatement activities would not install any infrastructure that could exacerbate fire risk or could result in temporary or ongoing impacts to the environment. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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?

Impact Analysis:

Landslides tend to occur where slopes are steeper with higher relief. The Project Site has a susceptibility from landslides based on its geographic location (approximately 10 miles north of the San Andreas fault) and steep slopes. However, the lead abatement activities would not result in any changes to the existing drainage patterns on the project site and would not involve building new structures above ground. In addition, the lead abatement activities would implement erosion control best management practices (e.g., jute netting, hydroseed) on the project site which would assist in reducing the potential for future landslides after lead abatement activities complete.

Site workers would be present for the short project duration (4 months); therefore, the potential for substantial risk or injury to people from a landslide would be limited. In addition, the proposed project would not include construction of any structures that could expose people or structures to significant impacts from a landslide.

Conclusion:

A landslide hazard is considered to exist on the Project Site. However, the proposed project activities would occur outdoors away from any structures. Therefore, the risk of loss, injury, or death from a landslide would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

Cal Fire. 2023. *Fire Hazard Severity Zone Maps*. Available at: https://egis.fire.ca.gov/FHSZ/ (Accessed July 8, 2023).

21. MANDATORY FINDINGS OF SIGNIFICANCE

Based on evidence provided in this Initial Study, DTSC makes the following findings:

a. The project does not 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.

b. The project does not have impacts that are individually limited but cumulatively considerable. ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

c. The project does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Authority: Public Resources Code 21083, 21094.5.5
Reference: Public Resources Code Sections 21094.5 and 21094.5.5

Attachment A – Air Quality

Attachment B – Natural Environment Study

Attachment C - Noise