

**CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)  
INITIAL STUDY  
FOR  
GENERAL WASTE DISCHARGE REQUIREMENTS  
FOR  
COMMERCIAL LILY BULB OPERATIONS  
IN THE  
SMITH RIVER PLAIN**

PREPARED BY:

**California Regional Water Quality Control Board  
North Coast Region  
5550 Skylane Blvd, Ste. A  
Santa Rosa, CA 95403**

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# Initial Study for General WDRs for Commercial Lily Bulb Operations in the Smith River Plain

## I. PROJECT BACKGROUND

The California Regional Water Quality Control Board, North Coast Region (Regional Water Board) is responsible for the protection of water quality in the North Coast Hydrologic Region, which as of the 2023-2024 growing season saw 300 acres cultivated for easter lily bulbs. Approximately 1,000 acres of agricultural land is commercially farmed for easter lily bulbs in a 3- to 5-year seasonal rotation in the Smith River Plain Hydrologic Subarea and coastal terraces between Pyramid Point and the Oregon border. Regional Water Board staff intend to recommend that the Regional Water Board adopt General Waste Discharge Requirements (hereafter “General Order”) for Commercial Lily Bulb Operations located in the Smith River Plain Hydrologic Subarea and coastal terraces between Pyramid Point and the Oregon border, hereafter the “Project Area”. Commercial Lily Bulb Operations (fields used for cultivation are shown in Figure 1, below) have the potential to discharge wastes (including pesticides) to surface waters and groundwater and to affect other related controllable water quality factors such as riparian shade. For the purpose of this Initial Study and the proposed General Order, the term Commercial Lily Bulb Operations includes fields cultivated for lily bulbs or similar bulb crops anytime within a sequential five-year period, field roads, greenhouses, and pesticide mixing areas. The proposed General Order would establish a regulatory mechanism, in the form of General Waste Discharge Requirements with requirements, prohibitions, and provisions that would require: (1) enrollment and payment of fees; (2) implementation and adaptation of management practices; and (3) monitoring and reporting.

The proposed General Order is consistent with the State Water Resources Control Board (State Water Board) 2004 Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program (NPS Policy), which requires that all sources of nonpoint source (NPS) pollution that could affect water quality be regulated through waste discharge requirements (WDRs), waivers of WDRs, and/or prohibitions. The proposed General Order will regulate discharges from Commercial Lily Bulb Operations in order to implement the plans, policies, and requirements set forth in the Water Quality Control Plan for the North Coast Basin (Basin Plan) and the State Water Board Irrigated Lands Regulatory Program objectives and precedents. Compliance with the proposed General Order would ultimately meet the implementation plan goals identified in the Total Maximum Daily Load Implementation Policy Statement for Sediment-Impaired Receiving Waters in the North Coast Region and the Policy for the Implementation of the Water Quality Objectives for Temperature in the North Coast Region adopted by the Regional Water Board on November 29, 2004, and November 20, 2012, respectively.

## II. INTRODUCTION

This Initial Study has been prepared pursuant to the California Environmental Quality Act of 1970 (CEQA), and State CEQA Guidelines at California Code of Regulations (CCR), Title 14, Div. 6, Chap. 3. The Lead Agency for the project, as defined by CEQA, is the Regional Water Board.

Commercial Lily Bulb Operations can threaten to pollute surface water and groundwater and the beneficial uses that rely on these waters. Stormwater runoff can result in soil erosion and

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deliver excess sediment, pesticides, and nutrients to receiving waters. The removal and suppression of shade-providing trees and vegetation along watercourses can result in increases to in-stream temperatures, a reduction to the sediment and pollutant trapping potential of streamside areas, and insufficient habitat or food for threatened and endangered species.

This Initial Study analysis considers reasonably foreseeable management practices as examples of how the proposed General Order could be implemented and the associated potential impacts on the environment. However, the analysis does not constitute an absolute outcome or certainty in the determinations made. Some impacts may not be identified or mitigated through the proposed General Order because it is not possible to exactly predict who will take action in response to the proposed General Order, or what action(s) they will take. Therefore, this analysis is set at a programmatic level and is more general in nature to consider impacts from implementing reasonably foreseeable management practices. The types of actions that would be undertaken by Commercial Lily Bulb Operations subject to the proposed General Order would be consistent with management practices already being implemented through the Smith River Plain Water Quality Management Plan (SRPWQMP) which was approved in 2021. In some cases, implementation of management practices might be subject to another regulatory process which would entail identification and mitigation of any significant environmental effects. Therefore, other regulatory mechanisms can be expected to provide additional opportunities for minimizing and avoiding significant environmental effects. In some cases, it may not be possible to mitigate impacts of the proposed General Order to a less-than-significant level.

Adoption of the proposed General Order may result in adverse effects on the environment from the potential conversion of Important Farmland to a non-agricultural use and may result in conflicts with existing zoning for agriculture use or a Williamson Act contract. These two impacts may occur as a result of Streamside Management Area setbacks (riparian buffers) which implement the Policy for Implementation of the Water Quality Objectives for Temperature. Through adoption of Resolution R1-2014-0006, the Regional Water Board found the potential conversion of Important Farmland to a non-agricultural use and the potential conflict with existing zoning for agriculture use or a Williamson Act contract from implementing riparian buffers as significant and unavoidable. Adoption of the General Order has the potential to significantly impact Agricultural Resources with no feasible mitigation. Impacts of the Proposed Project on Cultural Resources and Tribal Cultural Resources are expected to be less than significant with mitigations. No Impact or Less than Significant Impacts from the Proposed Project to Aesthetics, Air Quality, Biological Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Geology and Soils, Land Use/Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation/Traffic, and Utilities/Service Systems are expected.

### **III. PROJECT SUMMARY**

The Proposed Project would involve adoption of the General Order, which would initiate the regulatory program and establish General Waste Discharge Requirements for Commercial Lily Bulb Operations in the Smith River Plain Hydrologic Subarea and coastal terraces between

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Pyramid Point and the Oregon border (hereafter Smith River Plain). Key elements of the proposed General Order include the following:

Pesticide, Sediment, and Erosion Management for Surface Water Protection,  
Streamside Management Areas for Surface Water Protection,  
Irrigation, Nutrient, and Pesticide Management for Groundwater Protection, and  
Monitoring and Reporting Requirements.

The purpose of the General Order is to:

Objective #1 - Protect and restore beneficial uses and achieve water quality objectives specified in the Basin Plan for areas in the Smith River Plain affected by Commercial Lily Bulb Operations by:

Minimizing or preventing nitrate and pesticide discharges to groundwater.

Minimizing or preventing nutrient and pesticide discharges surface water.

Minimizing or preventing sediment discharges to surface water.

Minimizing or preventing temperature impacts to surface water from loss of riparian shade.

Objective #2 - Effectively track and quantify achievement of the stated objectives over a specific, defined time schedule.

Objective #3 - Comply with the State Nonpoint Source Policy, the State Antidegradation Policy, the precedential language in the Eastern San Joaquin Agricultural Order, the North Coast Basin Plan, and other relevant statutes and water quality plans and policies, including the Temperature Implementation Policy, the Sediment TMDL Implementation Policy, and TMDLs in the North Coast Hydrologic Region.

### **IV. GENERAL ORDER COMPLIANCE MEASURES**

Many Commercial Lily Bulb Operations in the Project Area voluntarily implement a variety of management practices for water quality protection. Compliance with the proposed General Order is expected to result in an increase in the implementation of management practices already being implemented (as described in the SRPWQMP) to prevent and minimize sediment erosion, nutrient, and pesticide discharges. Although it is impossible to predict the exact locations or nature of actual management practices that will be implemented as a result of the proposed General Order, the types of actions that may occur would be consistent with those already in use that are effective in preventing and minimizing discharges of sediment, pesticides, and nutrients.

This Initial Study considers the potential environmental impacts associated with

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implementation of foreseeable management practices.

### **Pesticide, Sediment, and Erosion Management for Surface Water Protection**

Commercial Lily Bulb Operations would be required to implement management practices to prevent and minimize their discharges of pesticides and sediment to surface waters. The reasonably foreseeable management practices with the greatest potential for environmental impacts (i.e., those involving ground disturbance during construction/installation) include the following:

Runoff management features: This includes vegetated riparian buffers, filter strips, contour farming, vegetated treatment areas, and grassed swales.

Construction/installation of these features may include light disking, use of a “no till” or grass drill for seeding the proposed vegetated area, soil amendments, and associated transport of materials and equipment. Minor excavation and off-haul of soils may be required for construction of swales. Maintenance of runoff management features may include general vegetation management (e.g., mowing, weeding, etc.).

Retention/Detention basins: This includes basins constructed from an embankment or excavation to capture and retain/detain stormwater runoff. Construction of basins requires use of heavy equipment, such as dozers, hydraulic excavators, trenchers, dump trucks, scrapers, etc. Engineered fill material may need to be imported to the site for construction of the embankment and/or excavated material may need to be hauled off from the site and disposed of at a landfill. Maintenance activities may include periodic inspections of the basin, removal of accumulated sediment, removal of debris/trash, replacement of damaged parts, and vegetation management.

### **Streamside Management Area for Surface Water Protection**

Commercial Lily Bulb Operations would be required to implement Streamside Management Area requirements including setbacks based on type of waterbody. Requirements include allowing natural succession of riparian vegetation and possibly installing vegetated buffers.

### **Irrigation, Pesticide, and Nutrient Management for Groundwater Protection**

Commercial Lily Bulb Operations would be required to implement irrigation and nutrient management practices to prevent and minimize discharges of nitrate to groundwater. The proposed General Order would not specify or prescribe specific management practices that enrollees must undertake to reduce discharges. Dischargers would have the flexibility to implement the management practices that are most suitable for their specific situation or otherwise choose how they would comply with discharge prohibitions of the General Order. General agricultural management practices implemented in other Regional Irrigated Lands Orders offer a good indication of the reasonably foreseeable types of irrigation and nitrogen efficiency practices that may be implemented under the General Order. These could include, but are not limited to nutrient application at agronomic rates, application timing based on precipitation forecasts, soil testing, irrigation water testing, and use of cover crops. Enrollees would be required to prepare and implement an Irrigation and Nitrogen Management Plan (INMP) for each field which budgets all sources of nitrogen applied and removed during the growing season and harvest. INMP reporting drives adaptive management of irrigation and

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nutrient practices on the farm level by identifying statistical outliers of nitrogen application vs. removal. Commercial Lily Bulb Operations designated as statistical outliers would be required to obtain nitrogen management training or work with a nitrogen management planning specialist for certification of their next INMP.

### **Monitoring and Reporting Requirements**

Commercial Lily Bulb Operations would be required to either individually or through a Grower Coalition implement the Monitoring and Reporting Program. The proposed Monitoring and Reporting Program is expected to consist of (1) receiving surface water and groundwater monitoring; (2) Drinking Water Well sampling; (3) annual compliance reporting and (4) water quality trend monitoring reporting every five years.

Surface water quality monitoring may include: (1) Receiving surface water monitoring to determine whether surface waters downstream of Commercial Lily Bulb Operations meet applicable water quality objectives and detect and track any trends in degradation; (2) an Adaptive Management Program in response to receiving surface water monitoring which includes Edge-of-Field monitoring as a compliance option to demonstrate practices implemented are not causing or contributing to downstream exceedances in receiving waters.

Groundwater monitoring may include: (1) Drinking Water Well monitoring to identify drinking water wells with nitrate concentrations that exceed the Maximum Contaminant Level for nitrate, identify wells with California Department of Pesticide Regulation 6800(a)<sup>6</sup> listed pesticide concentrations over the human health reference level, and notify any well users; and (2) groundwater trend monitoring to determine current water quality conditions of groundwater relevant to lily bulb cultivation, and to develop long-term groundwater quality information to evaluate regional effects of Commercial Lily Bulb Operations.

Commercial Lily Bulb Operations would be required to annually report relevant management practices relating to pesticide, sediment, and erosion control, streamside area management, irrigation and nutrient management. Water quality monitoring results would be reported annually and evaluated every five years for trends. management practice and water quality monitoring reporting would be used to evaluate the impact of Commercial Lily Bulb Operation on water quality conditions and inform regulatory decisions over time.

## **V. SUMMARY OF POTENTIAL ENVIRONMENTAL IMPACTS**

This Initial Study identifies potential environmental impacts of physical changes resulting from implementation of foreseeable management practices implemented in response to the General Order that, over time, would result in reduction in erosion, sedimentation, stormwater runoff, nutrient and pesticide discharges, and a reduction in the suppression of shade producing vegetation alongside watercourses from fields planted in lily bulbs. The proposed General Order is expected to result in increases in the use of management practices. Implementation of management practices could potentially result in short-term impacts related to construction activities (grading/excavation, vegetation removal, stockpiling soils, and mobilizing heavy equipment).

Based on existing available information and evidence provided in this Initial Study, compliance



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with the proposed General Order would result in “Less Than Significant” or “No Impact” in the following CEQA topic areas:

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

Based on existing available information and evidence provided in this Initial Study, compliance with the proposed General Order would result in “Less Than Significant with Mitigation” in the following CEQA topic areas:

- Cultural Resources
- Tribal Cultural Resources

Based on existing available information and evidence provided in this Initial Study, compliance with the proposed General Order would result in “Potentially Significant Impact” in the following CEQA topic areas:

- Agriculture and Forestry Resources

## **VI. ENVIRONMENTAL SETTING**

The Smith River Plain is a coastal plain located at the lower end of the Smith River watershed near the Smith River Estuary. North of the Smith River Plain is a narrow four-mile stretch of coastal terrace with about 100 acres currently farmed for lily bulbs. The Smith River Watershed encompasses 762 square miles in the northwest corner of California and southwest corner of Oregon with much of the watershed located in the Klamath and Siskiyou Mountains. The Smith River Plain is a broad, sub rectangular emerged marine terrace of low relief at the base of a range of rugged mountains. It covers about 63 square miles and receives an average of 75 inches of rainfall annually. Cool summers and mild winters characterize the

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climate of the plain. Precipitation is heaviest during the five coldest months, from November through March. (<https://pubs.usgs.gov/wsp/1254/report.pdf>).

Quaternary alluvial fan, flood-plain, terrace, and Battery Formation deposits form the primary groundwater-bearing formations in the basin ([https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/1\\_001\\_SmithRiverPlain.pdf](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/1_001_SmithRiverPlain.pdf)). Several small tributaries (Tillas Slough, No Name Creek, Ritmer Creek, Delilah Creek, Dominie Creek, Rowdy Creek, Morrison Creek, Mello Creek, and Yontocket Slough) cross the plain and drain into the Smith River. The mainstem of the Smith River bisects the plain dividing it into a southern and northern half. This General Order focuses on the northern half of the plain where lily bulbs are commercially cultivated.

The Smith River Plain is part of the ancestral lands of the Tolowa Dee-ni' Nation that has a population of about 1,750 tribal members. The town of Smith River is also located within the plain and has a population of around 900 people. Currently the Smith River Plain is used for lily bulb cultivation, cattle ranching, dairy production, and aggregate mining. In support of those land uses, the hydrology and habitat of the area has been highly modified by, for example, the conversion of lands to agriculture, diking, the operation of tide gates, and the removal of riparian vegetation and woody debris from stream channels. At least 26 species of fish have been observed in the Smith River Plain and estuary including commercially important Chinook salmon, Pacific herring, and anchovies (Parthree, 2004). Other salmonids observed include steelhead and cutthroat trout.

The lily bulb crop is part of a two to five-year rotation of planted fields. The fields are used as forage for livestock or cut hay for one to four years and for lily bulbs for one year, plus some field preparations done in the year prior to planting bulbs. Nematodes, root and bulb rot, and Botrytis blight (gray mold) are the primary threats to the health of the lilies, while aphids also attack the plants throughout spring and summer. Growers employ a wide variety of techniques, both mechanical and chemical, to lessen the impact of these pests. Some activities associated with lily bulb cultivation present a potential risk to water quality, such as field preparation, application of pesticides and fertilizers during wet weather or high winds, overspray, and direct discharge of stormwater or irrigation runoff to waterbodies.

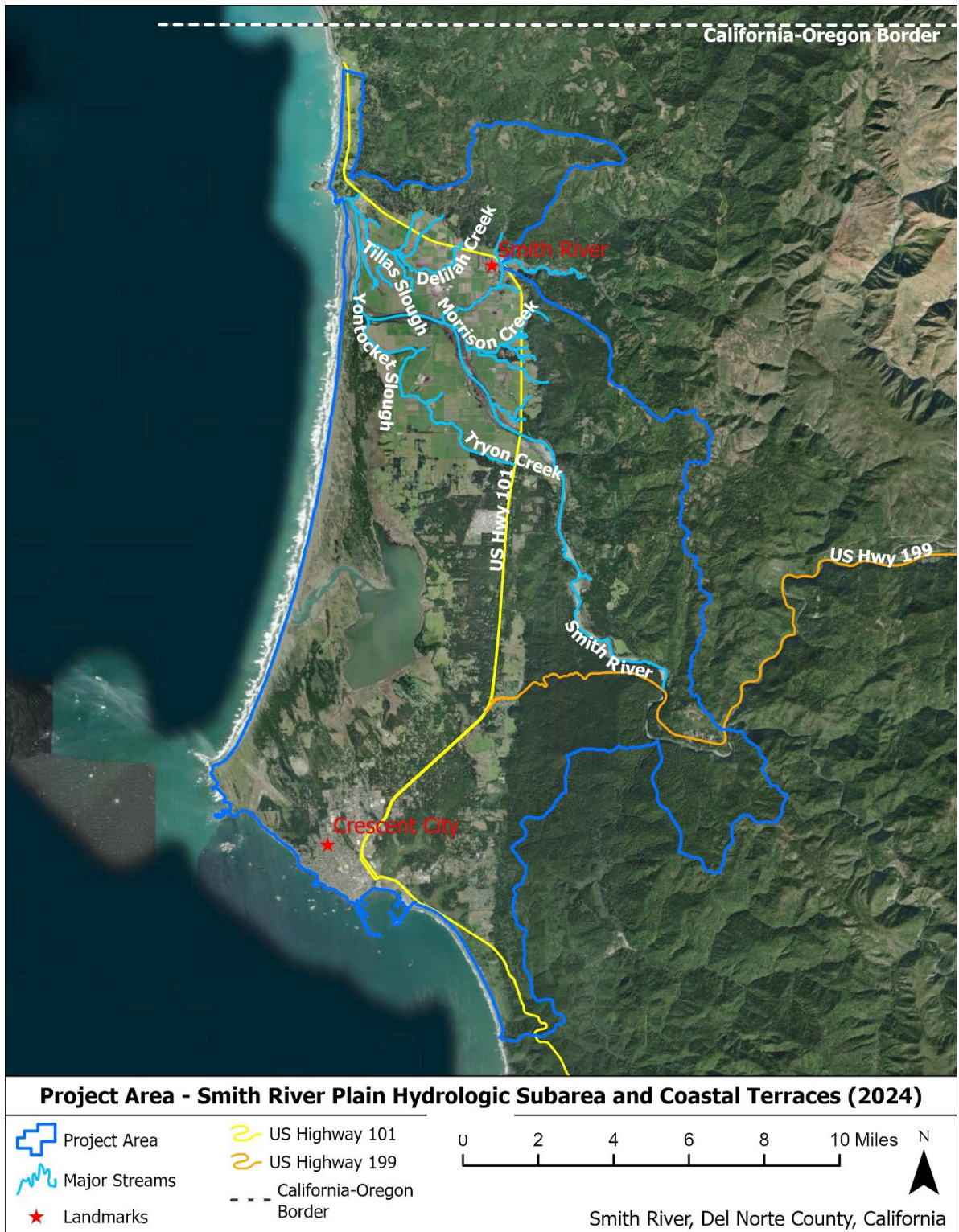
Beginning in 2010, surface water monitoring conducted by the Regional Water Board in tributaries draining commercial lily bulb operations has recorded pesticides (primarily copper) concentrations occasionally exceeding water quality objectives at sampling locations downstream of fields cultivated for lily bulbs. Groundwater monitoring conducted by the Regional Water Board in the 1980s led to a change in pesticide use due to elevated levels of Aldicarb and 1,2-Dichloropropane (1,2-D) in some drinking water wells. Groundwater monitoring conducted by the Regional Water Board in 2015 recorded low levels of these discontinued pesticides in addition to nitrate concentrations near or exceeding the drinking water maximum contaminant level (MCL). In 2018, Delilah Creek and Tillas Slough were added to the State of California 303(d) list of impaired water bodies for concentrations of dissolved copper and Diuron (pesticides currently used in commercial lily bulb operations).

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This Initial Study provides a description of existing conditions relative to each CEQA topic area in the Environmental Checklist in the “background” discussion at the beginning of each environmental topic within Section D, Evaluation of Potential Environmental Impacts below.

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**Figure 1:** Map of Project Area which is the Smith River Plain Hydrologic Subarea and coastal terraces between Pyramid Point and the Oregon border.



## **VII. BASELINE CONDITIONS**

This environmental analysis considers potential environmental impacts of implementing the proposed General Order. It considers actions that may be taken to comply with the General Order, beyond those actions that have already been implemented voluntarily or under existing local regulations.

The baseline conditions for the purpose of this environmental analysis include:

1. Existing Commercial Lily Bulb Operations.
2. Existing physical conditions, including management practices that are already implemented.
3. Existing physical conditions as a result of existing permits, WDRs, and waivers of WDRs issued by the Regional Water Board or the State Water Resources Control Board.

### **Existing Regulatory Framework**

Discharges from Commercial Lily Bulb Operations in the Project Area have not yet been regulated by the Regional Water Board either via General WDRs, waivers of WDRs, or prohibitions.

### **Existing Voluntary Water Quality Management**

Beginning in the mid-2010s, Commercial Lily Bulb Operators began to voluntarily implement management practices such as vegetative filter strips and through the 2021 Smith River Plain Water Quality Management Plan (SRPWQMP) expanded the variety of management practices implemented to prevent and minimize discharges to surface waters. Through the SRPWQMP, Commercial Lily Bulb Operations provide annual reports of implemented management practices and participate in an inspection program led by Regional Water Board staff. To the extent that management practices were implemented prior to initiating development of the General Order, they are considered to be part of the baseline physical conditions.

## **VIII. AGENCY DETERMINATION**

Depending on how Commercial Lily Bulb Operations choose to respond to requirements of the General Order, mitigation measures will be required to avoid, minimize, and reduce potential impacts on the environment. However, it is expected that implementation of certain requirements of the proposed General Order may have a significant impact on the certain environmental resource areas, therefore, an Environmental Impact Report (EIR) will be prepared for the proposed project.

## **IX. PUBLIC PARTICIPATION AND REVIEW**

In order for the public and regulatory agencies to have an opportunity to submit oral comments on the scope of the EIR, a scoping meeting will be held during the 45-day scoping period. The purpose of a scoping meeting is to seek input from public agencies and members of the public

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on the range of project actions, alternatives, reasonably foreseeable methods of compliance, significant impacts to be analyzed, cumulative impacts if any, and mitigation measures that will reduce impacts to a less than significant level as part of the development of the proposed General Order; and to eliminate from detailed study issues found not to be important.

Scoping may also assist in resolving concerns of affected federal, state, and local agencies, the proponent of the action, and other interested persons. Early public involvement assists Regional Water Board staff in refining the scope of the project and determining the range of environmental information and potential impacts the proposed project might have on the various categories of environmental resources such as tribal cultural resources and agriculture.

One hybrid scoping meeting will be conducted on October 22, 2024. The meeting will include a presentation about the draft General Order and potential adverse environmental impacts associated with implementation of the General Order. Agencies and the public will have the opportunity to provide oral comments during the CEQA scoping meeting and/or by submitting written comments any time during the 45-day scoping period. See the Notice of Preparation (NOP) for meeting details.

Following the scoping period, staff will begin developing a Draft EIR to include further analysis of potential direct and indirect impacts of the General Order related to reasonably foreseeable management practices that Commercial Lily Bulb Operations may implement to comply with the General Order. CEQA Guidelines Section 15123(b)(3) requires identification of “issues to be resolved,” which in this case includes the Regional Water Board making a choice among project alternatives and whether and how to mitigate significant impacts of actions taken to comply with the proposed General Order.

The purpose of the alternatives analysis in an EIR is to describe a range of reasonable alternatives to the project that could feasibly attain the objective of the project, and to evaluate the comparative merits of the alternatives (CEQA Guidelines, §15126.6, subd. (a).). Additionally, CEQA Guidelines section 15126.6, subdivision (b) requires consideration of alternatives that could avoid or substantially lessen any significant adverse environmental effects of the proposed project, including alternatives that may be more costly or could otherwise impede the project’s objectives, and CEQA Guidelines section 15126.6, subdivision (e) requires consideration of the No Project Alternative.

The project proposed is the Regional Water Board’s discretionary action to adopt the General Order for the protection of water quality associated with Commercial Lily Bulb Operations. The Regional Water Board will prepare a Draft EIR, which includes a properly noticed public review period of 45-days. Following the close of the comment period, staff will prepare responses to comments received on the Draft EIR in preparation of the Final EIR. The Regional Water Board will review the Final EIR before certifying it as meeting the requirements of CEQA during a properly noticed public hearing. Once the EIR is certified, it will be considered by the Regional Water Board along with other important information, which will likely be presented at the time it considers adoption of the proposed General Order.

## X. INITIAL STUDY

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### A. PROJECT DESCRIPTION AND BACKGROUND

1. **Project title:** General Waste Discharge Requirements for Commercial Lily Bulb Operations in the Smith River Plain
  
2. **Lead agency name & address:**  
  
California Regional Water Quality Control Board  
North Coast Region  
5550 Skylane Blvd. Suite A  
Santa Rosa, CA 95403
  
3. **Contact person:** Brenna Sullivan, Engineering Geologist  
(707) 576-2220  
[brenna.sullivan@waterboards.ca.gov](mailto:brenna.sullivan@waterboards.ca.gov)
  
4. **Project location:** Smith River Plain Hydrologic Subarea and the coastal terrace between the Smith River Plain Hydrologic Subarea and the Oregon border.
  
5. **Description of project:** See sections I through V above.

#### 6. Setting and surrounding land uses:

The proposed General Waste Discharge Requirements for Commercial Lily Bulb Operations in the Smith River Plain Hydrologic Plain Subarea (General Order) would regulate discharges from Commercial Lily Bulb Operations in the Smith River Plain and the four-mile stretch of coastal terrace between the Smith River Plain and the Oregon border (Project Area). The Smith River Plain is dominated by low gradient streams and sloughs surrounded by gently rolling fertile land that is primarily utilized for agricultural production of dairy, cattle, and lily bulbs in addition to several residential communities, small commercial and light industrial areas. The Plain occupies approximately 63 square miles of Del Norte County in the extreme northwest corner of California along the Pacific Ocean. Annual precipitation in the ranges from 65- to 77-inches, increasing to the northeast with the heaviest precipitation in the coldest months of from November to March. The Smith River crosses the northern portion of the plain near the town of Smith River and is the major watercourse in the area. Lake Earl and Lake Tolowa are shallow brackish lakes in the west central part of the plain and form collection basins for runoff from several minor streams. The Del Norte County seat of Crescent City is located in the southern portion of the plain. Pesticides and nutrients impact water quality in the Smith River Plain surface waters and

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groundwaters.

**7. Other public agencies whose approval is required:**

No other public agency approvals are required for the proposed General Order.

**8. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?**

The Regional Water Board contacted eight tribes on the current Native American Heritage Commission Tribal Consultation (NAHC) List in April 2024. One tribe have requested consultation pursuant to Public Resources Section 21080.3.1. Consultation has begun and is ongoing.



## **B. ENVIRONMENTAL RESOURCES POTENTIALLY IMPACTED**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/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

## **C. LEAD AGENCY 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

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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.

Signed,



Valerie Quinto  
Executive Officer  
North Coast Regional Water Quality Control Board

#### **D. EVALUATION OF POTENTIAL ENVIRONMENTAL IMPACTS**

Various management practices are expected to be implemented by Commercial Lily Bulb Operations in order to comply with the General Order. Anticipated compliance actions that implicate possible environmental effects are summarized below. Due to the voluntary efforts of Commercial Lily Bulb Operations, various management practices are already being implemented and are part of the existing baseline setting. CEQA requires review of environmental impacts that may result from implementation of management practices that may have potentially significant adverse effects on the environment.

The Environmental Checklist and discussion that follows is based on sample questions provided in the CEQA Guidelines, which focus on various individual concerns within 20 different broad environmental categories, such as air quality, cultural resources, land use, and traffic (and arranged in alphabetical order). The Guidelines also provide specific direction and guidance for preparing responses to the Environmental Checklist. Each question in the Checklist essentially requires a “yes” or “no” reply as to whether or not the project will have a potentially significant environmental impact of a certain type and following the Checklist for each major environmental heading are citations, information and/or discussion that supports that determination.

The Checklist provides, in addition to a clear “yes” reply and a clear “no” reply, two possible “in-between” replies, including one that is equivalent to “yes, but the Lead Agency has made changes to the project to mitigate the impact”, and another “no” reply that requires a greater degree of discussion, supported by citations and analysis of existing conditions, threshold(s) of significance used and project effects than required for a simple “no” reply. Each possible answer to the questions in the Checklist, and the different types of discussion required, are discussed below:

Potentially Significant Impact. Checked if a discussion of the existing setting (including relevant regulations or policies pertaining to the subject) and project characteristics with regard to the environmental topic demonstrates, based on substantial evidence, supporting information, previously prepared and adopted environmental documents, and specific criteria or thresholds used to assess significance, that the project will have a potentially significant impact of the type described in the question.

Less Than Significant with Mitigation. Checked if the discussion of existing conditions and specific project characteristics, also adequately supported with citations of relevant research or documents, determine that the project clearly will or is likely to have particular physical impacts that will exceed the given threshold or criteria by which significance is determined, but that with the incorporation of clearly defined mitigation measures into the project such impacts will be avoided or reduced to less-than-significant levels.

Less Than Significant Impact. Checked if a more detailed discussion of

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existing conditions and specific project features, also citing relevant information, reports or studies, demonstrates that, while some effects may be discernible with regard to the individual environmental topic of the question, the effect would not exceed a threshold of significance which has been established by the Lead or a Responsible Agency. The discussion may note that due to the evidence that a given impact would not occur or would be less than significant, no mitigation measures are required.

No Impact. Checked if brief statements (one or two sentences) or cited reference materials (maps, reports or studies) clearly show that the type of impact could not be reasonably expected to occur due to the specific characteristics of the project or its location (e.g., the project falls outside the nearest fault rupture zone, or is several hundred feet from a 100-year flood zone, and relevant citations are provided). The referenced sources or information may also show that the impact simply does not apply to projects like the one involved. A response to the question may also be "No Impact" with a brief explanation that the basis of adequately supported project-specific factors or general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a basic screening of the specific project).

Actions to comply with the proposed General Order would result in a multitude of environmental benefits, including reducing pesticide and sediment inputs to creeks and streams, improving water quality, reducing erosive forces from stormwater runoff, improving channel stability, improving fish habitat, and enhancing riparian habitat. In some cases, however, it is possible that the adoption of the General Order Permit could lead to potentially significant impacts that will be evaluated in the EIR.

Project Alternatives A reasonable range of potentially feasible project alternatives, in addition to the no project alternative, will be developed and evaluated in the EIR. The Regional Water Board will consider comments of responsible and trustee agencies and the public provided during the scoping period in the development of project alternatives.

### **I. AESTHETICS**

Except as provided in Public Resources Code Section 21099, would the project:

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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?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) In nonurbanized 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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

**Background**

Commercial Lily Bulb Operations in the Project Area that would be subject to the proposed General Order are located in a rural agricultural setting. These lands are visible from public roads and neighboring properties and may also be partially visible from public open space areas. Commercial Lily Bulb Operations are cultivated fields of around 5-20 acres. Commercial Lily Bulb Operations may include equipment sheds, greenhouses, field roads, and pesticide mixing areas.

The Project Area is a rural agricultural region with scenic vistas, including a dramatic coastline, forested coastal hills, year-round streams, the Smith River itself and its estuary. Dozens of miles of local roads cross through the Project Area in addition to several miles of Highway 101.

**Discussion of Impacts**

**a) Would the project have a substantial adverse effect on a scenic vista?**

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Less Than Significant Impact. The Smith River Plain Hydrologic Subarea is situated in a scenic area of coastal northern California with expansive views of agricultural lands, the Pacific coastline, and forested coastal hills. There are abundant scenic vistas at various vantage points on the Smith River Plain. Implementation of management practices in response to the General Order are expected to be small in scale (planting of vegetative buffers, constructing grassy swales, and field road drainage improvements) with no large building construction anticipated. Changes to aesthetic qualities of the Smith River Plain that could result in response to the General are expected to be limited to minor alterations to vegetation and topography that are low in profile (i.e., located near the ground surface) and will therefore blend into the existing landscape.

**b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

Less Than Significant Impact. The Smith River Plain Hydrologic Subarea contains riparian trees and very few significant rock outcroppings within its gently sloping to relatively flat alluvial and flood plain topography and well-established agricultural operations. Highway 101 is the only designated State Scenic Highway in the project area. The types of management practices that are expected to be implemented in response to the General Order would not affect these features. Reasonably foreseeable management practices anticipated to be implemented in response to the General Order are intended to preserve and enhance riparian areas, including trees, enhance vegetated buffers, and to prevent or minimize erosion, both of soil and rock outcrops. Some fields planted to lily bulbs are adjacent to a designated State Scenic Highway; however, reasonably foreseeable management practices would typically be small in scale and designed to enhance and protect water resources.

A management practice that requires land disturbance, such as the construction of a grassy swale or sediment basin is expected to include minor surface soil excavation or grading during construction which would be temporary in nature and would not result in permanent damage to scenic resources.

**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?**

Less Than Significant Impact. As described above, Commercial Lily Bulb Operations subject to the proposed General Order are located in a rural agricultural setting. The visual character of the area is generally open, typified by agricultural fields planted in lily bulbs and hay, field roads, riparian areas, and surrounding natural hillside vegetation. Implementation of management practices could result in

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small scale, temporary alteration of ground cover vegetation or topography that would not be highly visible and would not degrade or change the overall visual character of the rural agricultural setting or the surrounding viewshed areas. Therefore, the impacts to scenic resources would be less than significant.

**d) Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?**

Less Than Significant Impact. The project would not require those complying with the General Order to install any lighting or structures that could create light or glare and impair day or night-time views. Therefore, the impacts related to creating a new source of substantial light or glare are less than significant.

**II. 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 CalFIRE 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:

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

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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	X			

**Background**

The California State Department of Conservation produces maps of counties with Prime Farmland, Unique Farmland, and Farmland of Statewide Importance (agricultural lands of special significance). These are farmlands which based on their soil characteristics are especially well suited for agricultural production. It can be estimated from the Farmland Mapping and Monitoring Program information that approximately 75 percent of the Smith River Plain Hydrologic Subarea is mapped as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance.

The vast majority of U.S. domestic cultivation of Easter Lilies occurs in the Project Area. Data from Commercial Lily Bulb Operators indicate about 1,000 acres of land is farmed in a 3-to-5-year seasonal rotation with about 300 acres planted in any given year. The General Order is expected to apply all lands in the rotational planting of lily bulbs in the Project Area.

The General Order is expected to result in the implementation of management practices that will prevent or minimize the discharge of pollutants from Commercial Lily Bulb Operations, including Streamside Management Area requirements for allowing the natural succession of riparian vegetation adjacent to waterbodies and/or creating vegetative buffers between farmed areas and waterbodies. These in turn will lead to an improvement of water quality, stream function, and riparian health. Implementation of the proposed General Order Permit is consistent with the current Del Norte County Code Section 12.02.20.C which finds that maintenance of



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a quality environment for the people of Del Norte County, now and in the future, is a matter of public concern. According to current Del Norte County Zoning information, the vast majority of Commercial Lily Bulb Operations over the last five years have been located in Agriculture Districts with a small fraction located in Resource Conservation or Residential Districts. Del Norte County General Plan Natural Resource Conservation Goals and Policies include: 1) protecting and enhancing the natural qualities of Del Norte County's streams, creeks and groundwater and to ensure sufficient water supplies of good quality for all beneficial uses; and 2) ensuring that riparian vegetation be maintained along streams, creeks, and sloughs and other water courses for their qualities as wildlife habitat, stream buffer zones, and bank stabilization (Del Norte County General Plan, 2003). The proposed General Order does not appear to conflict with Del Norte County General Plan Natural Resource Conservation Goals and Policies which prohibit permitting the conversion of parcels designated for prime agricultural use to non-agricultural use nor the Del Norte County Zoning Code. The proposed General Order is not expected to require conversion of a parcel designated for prime agricultural use to a non-agricultural use through the possible reduction in planted area to comply with proposed Streamside Management Area requirements.

### **Discussion of Impacts**

**a) Would the project 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) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**e) Would the project 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?**

Potentially Significant Impact(s). Streamside Management Area requirements of the General Order may cause incidental loss of agricultural use in lands mapped as Prime Farmland, Unique Farmland or Farmland of Statewide Importance. These losses would only affect a relatively narrow band of land on either side of watercourses where compliance measures to prevent or minimize elevated stream temperatures and loss of riparian areas could be taking agricultural land out of production and converting it to a non-agricultural use. Many Growers have voluntarily implemented riparian setbacks resulting in expanded riparian shade and vegetated buffers.

In response to Streamside Management Area requirements, riparian vegetation may expand, and vegetative buffers may be planted. Increases in riparian vegetation would have beneficial impacts to water quality by filtering pollutants, providing shade, and lowering stream temperatures.

**c) Would the project 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))?**

No Impact. Implementation of management practices would not conflict with existing zoning for, or cause rezoning of forest land (as Defined in Public Resources Code section 12220(g)) or timberland (as defined by Public Resources Code section 4526).

**d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?**

No Impact. Implementation of management practices would not result in the loss of forest land or conversion of forest land to non-forest use because Commercial Lily Bulb Operations are typically located on lands which are zoned for agriculture. Based on the last five years of reporting through the SRPWQMP, no land planted to lilies is located in a timber production zone or on forest land. If Commercial Lily Bulb Operations expand into timber production zones or forested lands, that action would trigger local county land use regulations and California Department of Forestry and Fire Protection timber harvest regulations under the Forest Practice Act and associated planning and permitting processes by these agencies. Requirements of the General Order would not cause conversion of forest lands. Therefore, no impacts are anticipated.

**III. AIR QUALITY**

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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?				X

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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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 (including releasing emissions that exceed quantitative thresholds for ozone precursors)?				X
c) Expose sensitive receptors to substantial pollutant concentrations?				X
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				X

**Background**

According to the California Air Resources Board (Air Board), the Smith River Plain Hydrologic Subarea is located in the North Coast Air Basin and is regulated by the North Coast Unified Air Quality Management District. “No Impact” determinations in this section are based on evaluation of reasonably foreseeable management practices implemented in response to the General Order which may generate particulates and other air pollutants from construction equipment exhaust and land disturbance. Construction of these management practices are expected to disturb relatively small areas of land (a fraction of a percent of the approximately 13,000-acre Project Area) and will be very limited in duration (several days) such as the development of vegetative buffers, grassy swales, sediment basins, and field road drainage improvements. Although Commercial Lily Bulb Operations are typically located in Del Norte County Agriculture Zoning Districts, a few fields abut the Smith River Elementary School and single-family residential areas. These impacts are not expected to be significant relative to baseline conditions and not expected to result in violation of air quality standards. Conformity requirements do not apply as Del Norte County is designated as attainment or is unclassified for all current National Air Quality Standards.

**IV. BIOLOGICAL RESOURCES**

Would the project:

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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 or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?				X
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X

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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	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?				X

**Background**

The proposed General Order is developed specifically to protect aquatic resources in the watersheds, including fish, wildlife, and rare and endangered species, which are threatened by or have been adversely affected by discharges from Commercial Lily Bulb Operations. Reasonably foreseeable management practices implemented in response to the General Order are not expected to occur within watercourses, riparian areas, or unfarmed wetlands. The Regional Water Board designs its water quality programs to protect beneficial uses associated with the Region’s biological resources and Streamside Management Area requirements of the General Order are intended to limit activities within and adjacent to watercourse and wetlands. According to U.S. Fish and Wildlife no critical habitat for threatened and endangered species is located on the agricultural lands of the Smith River Plain Hydrologic Subarea. Tillas Slough and Lake Earl are identified as critical habitat for the Tidewater Goby. The distribution range of Coho Salmon includes the Smith River, Morrison Creek, Elk Creek and Rowdy Creek. Commercial Lily Bulb Operations within the Project Area are adjacent to and/or drain to these waterbodies.

**V. CULTURAL RESOURCES**

Would the project:

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 as defined in §15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		X		

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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of dedicated cemeteries?		X		

**Background**

Human history in the Project Area likely dates to sometime between 5,000 and 10,000 years ago. Archeological excavations along the southern coast of the Smith River plain dates to over 2,000 years before present. The aboriginal people who inhabited the Smith River drainage and coastal plain of Del Norte County during the ethnographic period are today referred to collectively as the Tolowa with a population of around 10,000 prior to contact with European settlers. Based on linguistic evidence, the Athabascan speaking Tolowa did not enter this region until about 1100 A.D. The first Europeans to see Del Norte County were most likely Spanish who had arrived by ship in the 17th and 18th centuries. The first American to explore the country overland was Jedediah Strong Smith, for whom the Smith River is named. In 1828, Smith and his party of trappers traded with Native Americans, came upon Lake Earl, and camped at Crescent City. The 1850s saw influxes of European immigrants coinciding with the California Gold Rush and statehood.

CEQA §15064.5 considers historic resources significant if they are eligible for, or are listed in, the California Register of Historical Resources. Historic resources must meet one of the following criteria to be eligible:

- It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- It is associated with the lives of persons important to local, California, or national history.
- It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.
- It has yielded, or has the potential to yield, information important to the pre-history or history of the local area, California, or the nation.

**Discussion of Impacts**

**a) Would the project cause a substantial adverse change in the significance**

**of a historical resource as defined in §15064.5?**

**b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**

**c) Would the project disturb any human remains, including those interred outside of formal cemeteries?**

Less than Significant Impact with Mitigation. Reasonably foreseeable management practices implement to comply with the Commercial Lily Bulb Order could involve minor grading and construction activities. All of these minor grading and construction activities are expected to fall within the existing, developed agricultural lands therefore it is unlikely that most management practices would cause a substantial adverse change in the significance of a historical or archaeological resource pursuant to section 15064.5. Although there always remains the potential for ground-disturbing activities to expose previously unrecorded cultural resources, impacts to cultural resources would be relatively rare because most management practices involve the construction of small features that would be sited within previously disturbed areas, such as existing unpaved roads and fields, and within previously disturbed depths. On relatively few occasions, management practices may require excavation or grading in areas or to depths not previously disturbed, raising the possibility of impacting cultural resources buried at greater depths with the potential to alter or destroy historical, archaeological, or paleontological resources or human remains.

For management practices that involve modifications to previously undisturbed soils (i.e., below the levels of current agricultural practices, or in areas that have not previously been cultivated or developed) or a structure that may qualify as a historical resource, mitigation measures such as retaining an archeologist to perform a records search and potentially a pedestrian survey will be included in the General Order. If cultural resources are identified, relocating or redesigning the management practice will be required to avoid the resources.

**VI. ENERGY**

Would the project:

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?				X

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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

**Background**

This section evaluates the potential energy-related impacts of implementing the proposed General Order. The analysis considers both direct and indirect energy consumption associated with the Orders implementation and reasonably foreseeable management practices. Current energy use in the project area for lily bulb operations primarily consists of electricity and fossil fuels for various operations, including but not limited to field preparation, crop maintenance, and harvesting activities.

**Discussion of Impacts**

**a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

No Impact. Implementation of the General Order is not expected to significantly increase energy consumption. While some reasonably foreseeable management practices may require initial energy inputs for implementation (e.g., changes in tillage practices or construction of sediment basin), they are generally designed to improve overall resource efficiency, including energy use. Improved land management practices (nutrient management and erosion control) can often lead to reduced fuel consumption for farm equipment and decreased reliance on energy-intensive inputs.

**b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

No Impact. Requirements of the General Order align with state and local goals for energy efficiency in the agricultural sector. By promoting more efficient land management practices, the order supports broader energy conservation objectives.

**VI. GEOLOGY AND SOILS**

Would the project:



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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:				X
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?				X
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?				X
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				X

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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	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 waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

**Background**

The proposed project includes implementation of management practices selected by Commercial Lily Bulb Operators to prevent and minimize impacts to water quality. These management practices are expected to be focused on setbacks from watercourses, construction of vegetative filter strips, grassy swales, and possibly sediment basins in addition to drainage improvements on field roads. No structures for human habitation are expected to be constructed and management practices are expected to reduce erosion and sediment discharges to surface waters from baseline conditions.

The implementation of most management practices would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. A search of the GBIF (the Global Biodiversity Information Facility, an international network and data infrastructure funded by the world's governments) did not return any palaeontologic records for the project area. With the exception of a few small (<1/10 acre) outcrops of Central Belt Franciscan Complex rocks extending above the relatively planer surface of the project area, no unique geologic features are located with the project area.

**VII. GREENHOUSE GAS EMISSIONS**

Would the project:

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

**Background**

Gases that trap heat in the atmosphere are called greenhouse gases (GHGs)<sup>1</sup>. The major greenhouse gases of concern include the following:

Carbon dioxide (CO<sub>2</sub>) -- Carbon dioxide enters the atmosphere through burning fossil fuels (coal, natural gas and oil), solid waste, trees and wood products, and also as a result of certain chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (or "sequestered") when it is absorbed by plants as part of the biological carbon cycle.

Methane (CH<sub>4</sub>) -- Methane is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and by the decay of organic waste in municipal solid waste landfills.

Nitrous oxide (N<sub>2</sub>O) -- Nitrous oxide is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste.

Fluorinated gases -- Hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride are synthetic, powerful greenhouse gases that are emitted from a variety of industrial processes. Fluorinated gases are sometimes used as substitutes for stratospheric ozone-depleting substances (e.g., chlorofluorocarbons, hydrochlorofluorocarbons, and halons). These gases are typically emitted in smaller quantities, but because they are potent greenhouse gases, they are sometimes referred to as High Global Warming Potential gases ("High GWP gases").

<sup>1</sup> <http://www.epa.gov/climatechange/ghgemissions/gases.html>

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A statewide GHG inventory conducted by the California Air Board indicates that of the total GHG emissions in California in 2019, the categories of GHG sources rank as follows by percent contribution: transportation (49 percent); industrial processes, including landfills and wastewater treatment (22 percent); commercial and residential fuel uses (14 percent); electricity generation (5 percent) agriculture and forestry (8 percent); and electricity imports (5 percent)<sup>2</sup>.

The net GHG emissions in the state increased from 1990 to 2004 by about 12%. The source categories contributing most significantly to the increase in emissions came from electricity generation (19% increase above 1990 contributions from this source category), transportation (21% increase), agriculture and forestry (39% increase) and an increase in unspecified emission sources (1161% increase). These increases were balanced by decreases in other source categories, including decreased emissions from commercial and residential fuel uses (13% decrease) and industrial fuel uses (7% decrease). The Global Warming Solutions Act of 2006 (AB 32) calls for the reduction by 2020 of GHG emissions to California's 1990 levels.

In 2006, California passed the California Global Warming Solutions Act of 2006, which requires the California Air Resources Board (CARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide greenhouse gas (GHG) emissions are reduced to 1990 levels by 2020 (representing an approximate 25 percent reduction in emissions). In May 2014, CARB approved the First Update to the Climate Change Scoping Plan (CARB, 2014), which builds upon the initial Scoping Plan with new strategies and recommendations. The Update highlights California's progress toward meeting the near-term 2020 GHG emission reduction goals, highlights the latest climate change science and provides direction on how to achieve long-term emission reduction goal described in Executive Order S-3-05. The nine early action measures have been documented to reduce California's GHG emissions with an estimated reduction of 13.16 percent from 1990 emissions in the year 2018<sup>13</sup>. As a result of these programs' implementations, California has met its goal to reach 1990 emissions levels by 2020 and had done so by 2016, four years before its proposed target year.<sup>3</sup>

State law requires local agencies to analyze the environmental impact of GHG emissions under CEQA. The Natural Resources Agency adopted the CEQA Guidelines Amendments in 2009. In 2011, the North Coast Unified AQMD adopted Rule 111 (Federal Permitting Requirements for Sources of Greenhouse Gases) into the District rules, to establish a threshold above which New Source Review (NSR) and federal Title V permitting applies, and to establish federally enforceable limits on potential to emit greenhouse gases for stationary sources. These plans address

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<sup>2</sup> <https://ww2.arb.ca.gov/ghg-inventory-data>

<sup>3</sup> Drotman, C., Huff, R., Le, C., *A Look at CARB's AB32 GHG Programs from Early Action to Today*, July 2021

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stationary sources that would result in long-term, operation increases in GHG emissions.

**Discussion of Impacts**

**a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Less Than Significant Impact. Adoption of the General Order itself will not cause a direct impact to greenhouse gases (GHGs). Implementation of reasonably foreseeable management practices above baseline conditions are expected to slightly increase greenhouse gas emissions relative to baseline conditions as a result of heavy equipment use to construct management practices; however, these impacts are expected to be minor and temporary.

Increases in riparian vegetation as a result of Streamside Management Area requirements are expected to counteract some of the expected increase in GHGs over baseline conditions as it results in an increase in woody biomass sequestering carbon from the atmosphere.

**b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

No Impact. The General Order will be consistent with the State Water Board Resolution No. 2008-0030 which directs Water Board staff to “require...climate change considerations, in all future policies, guidelines, and regulatory actions.”

**VI. HAZARDS AND HAZARDOUS MATERIALS**

Would the project:

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?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	

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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	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?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires?				X

**Background**

A CEQA analysis includes evaluation of the project impacts with respect to the use of hazardous substances, proximity to hazardous waste facilities, proximity to airports, likelihood of interfering with emergency response, and potential to expose people to significant wildfire risk.

Routine operations at Commercial Lily Bulb Operations involve the storage and use of hazardous materials such as agricultural chemicals and petroleum products. Commercial Lily Bulb Operation contain facilities to store and mix agricultural chemicals such as pesticides, fungicides, herbicides, and fertilizers. These

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chemicals are a potential source of pollution to surface and groundwater if not properly stored, applied, and managed. The production, use, disposal, and management of registered agricultural chemicals used at Commercial Lily Bulb Operations are regulated by County Agricultural Commissioners and California Department of Food and Agriculture (CDFA) and the U.S. EPA. Hazardous materials used at Commercial Lily Bulb Operations covered by multiple state and federal laws including Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The federal Insecticide, Fungicide and Rodenticide Act (FIFRA) is the primary federal regulation overseeing the production and use of beneficial poisons. Hazardous materials business plans (HMBP) are enforced by local county fire and emergency response divisions. California Department of Toxic Substances Control (DTSC) regulates hazardous waste sites that are not within federal jurisdiction.

The proposed General Order would not require additional environmental protective measures dealing with hazardous wastes beyond those already being required and enforced under current state or federal laws.

### **Discussion of Impacts**

**a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Less Than Significant. Implementation of certain management practices which require the use of heavy equipment are expected to involve the transport and use of materials that would qualify as hazardous pursuant to the California Health and Safety Code section 25501(o). These materials include gasoline and diesel to fuel equipment, and hydraulic fluid associated with equipment operations and machinery. Fuels and lubricant quantities used to implement certain management practices would be small in quantity and their application would be limited to the operation of construction-related equipment and vehicles. These types of hazardous materials are currently used at all Commercial Lily Bulb Operations to power farm equipment such as trucks and tractors.

**c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**d) Would the project 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?**

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Less Than Significant Impact. Implementation of management practices are not expected to result in the emission or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, nor are they expected to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5. Again, there is the possibility that hazardous materials (e.g., oil, gasoline) may be present during implementation of management practices which require the use of heavy equipment, but potential risks of exposure would be small, especially with proper handling and storage procedures. All risks of exposure would be short term and would be eliminated with the completion of construction activities.

**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) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**g) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

No Impact. There is one airport located in the Project Area, the Jack McNamara Field Airport which is sited over 10 miles south from the nearest existing Commercial Lily Bulb Operation. Actions taken by Commercial Lily Bulb Operations in response to the proposed General Order are not expected to expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Commercial Lily Bulb Operations are located in the lowest fire severity hazard zone areas.

**IX. HYDROLOGY AND WATER QUALITY**

Would the project:

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?				X



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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would:			X	
i) result in substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite;			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X

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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

**Background**

The State Water Board and the Regional Water Boards are the primary agencies with responsibility for the protection of water quality pursuant to the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) as codified in Water Code Division 7. The Legislature declared that the activities and factors that may affect the quality of waters of the state shall be regulated to attain the highest water quality that is reasonable, considering all demands being made on it (California Water Code section 13000). Water Code section 13242 requires that a program of implementation for achieving objectives include the following:

- (1) A description of actions necessary for achieving water quality objectives (WQOs), including recommendations for appropriate action by any entity, public or private;
- (2) A time schedule for actions to be taken; and
- (3) Surveillance to be undertaken to determine compliance with objectives.

California Water Code (CWC) section 13260(a)(1) requires that any person discharging waste or proposing to discharge waste within the Regional Water Board’s jurisdiction, other than to a community sewer system, that could affect the quality of waters of the state, file a report of waste discharge (ROWD) with the Regional Water Board, unless the Regional Water Board waives such requirement pursuant to CWC section 13269. The Regional Water Board may, at its discretion, issue WDRs pursuant to CWC section 13263(a).

CWC section 13263 (i) authorizes the Regional Water Board to prescribe general WDRs for a category of discharges if:

- The discharges are produced by the same or similar operations.
- The discharges involve the same or similar types of waste.
- The discharges require the same or similar treatment standards.
- The discharges are more appropriately regulated under general WDRs than individual WDRs.
- The general WDRs implement relevant water quality control plans and take

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into consideration, among other things, the beneficial uses of water to be protected, the water quality objectives reasonably required for that purpose, and the need to prevent nuisance

The State Water Board's 2004 Policy for the Implementation and Enforcement of the Nonpoint Source Pollution Control Program (NPS Policy) states that all non-point source discharges that can affect water quality must be regulated by either WDRs, waivers of WDRs, or prohibitions.

The Basin Plan is the Regional Water Board's master water quality control planning document. It designates beneficial uses and WQOs for waters of the state, including surface waters and groundwater. The Region's TMDLs and associated implementation plans to achieve WQOs are also part of the Basin Plan. Pursuant to the Basin Plan, and Board plans and policies, (including State Water Board Resolution No. 88-63), and consistent with the CWA, the existing and potential beneficial uses of waters in the North Coast Region include:

- Municipal and Domestic Supply (MUN)
- Agricultural Supply (AGR)
- Industrial Service Supply (IND)
- Industrial Process Supply (PRO)
- Groundwater Recharge (GWR)
- Freshwater Replenishment (FRSH)
- Navigation (NAV)
- Hydropower Generation (POW)
- Water Contact Recreation (REC-1)
- Non-Contact Water Recreation (REC-2)
- Commercial and Sport Fishing (COMM)
- Cold Freshwater Habitat (COLD)
- Warm Freshwater Habitat (WARM)
- Wildlife Habitat (WILD)
- Preservation of Areas of Special Biological Significance (ASBS)
- Preservation of Areas of Special Rare, Threatened, or Endangered Species (RARE)
- Marine Habitat (MAR)
- Migration of Aquatic Organisms (MIGR)
- Spawning, Reproduction, and/or Early Development (SPWN)
- Shellfish Harvesting (SHELL)
- Estuarine Habitat (EST)
- Aquaculture (AQUA)
- Native American Culture (CUL)
- Flood Peak Attenuation/Flood Water Storage (FLD)
- Wetland Habitat (WET)
- Water Quality Enhancement (WQE)
- Subsistence Fishing (FISH)

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- Inland Saline Water Habitat (SAL)

### *Surface Waters*

The surface water quality issue of most concern in the Project Area is impairment from dissolved copper and synthetic pesticides. Tillas Slough and Delilah Creek are identified on the CWA 303(d) list as impaired for dissolved copper and diuron. Although coastal tributaries to the Smith River which drain agricultural lands are not listed as impaired for sediment and temperature, agricultural practices associated with Commercial Lily Bulb Operations result in the discharge or threatened discharge of excess sediment discharge and create the potential for increases in stream temperature.

As part of efforts to control discharges of excess sediment and restore sediment impaired water bodies, the Regional Water Board adopted the TMDL Policy Statement for Sediment Impaired Receiving Waters in the North Coast Region, which is also known as the Sediment TMDL Implementation Policy, on November 29, 2004. This Policy was adopted through Resolution R1-2004-0087.

The Sediment TMDL Implementation Policy states that Regional Water Board staff shall control sediment pollution by using existing permitting and enforcement tools. The goals of the Policy are to control sediment waste discharges to impaired water bodies so that the TMDLs are met, sediment water quality objectives are attained, and beneficial uses are no longer adversely affected by sediment. The Sediment TMDL Implementation Policy also directs staff to develop: (1) the Work Plan, that describes how and when permitting and enforcement tools are to be used; (2) the Guidance Document on Sediment Waste Discharge Control; (3) the Sediment TMDL Implementation Monitoring Strategy; and (4) the Desired Conditions Report.

Elevated water temperature is a widespread water quality impairment in the North Coast Region. In 2014, the Regional Water Board adopted the Policy for the Implementation of the Water Quality Objectives for Temperature (Temperature Implementation Policy), which specifies that activities with potential to result in water temperature increases shall be addressed on a case-by-case basis to reduce impairments and prevent further impairment. The Temperature Implementation Policy directs staff to examine and address temperature when developing permits. The Temperature Implementation Policy specifies that shade controls are effective at correcting existing temperature impairments and preventing future temperature impairments. At a minimum, any program or permit should implement temperature shade load allocations in areas subject to existing TMDLs, including U.S. EPA-established temperature TMDLs.

To attain and maintain the water quality objectives for temperature, the Regional Water Board will implement programs and collaborate with others in such a manner to prevent, minimize, and mitigate temperature alterations associated with sediment discharges and controllable water quality factors. Controllable water quality factors affecting water temperature include any anthropogenic activity which results in the

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removal of riparian vegetation, sediment discharges, impoundments and other channel alterations, reduction of instream summer flows, and the reduction of cold-water sources. The Temperature Implementation Policy requires that factors contributing to elevated water temperatures be addressed when issuing WDRs.

### *Groundwaters*

The groundwater quality issue of most concern within the Project Area is elevated levels of nitrogen and synthetic pesticides associated with agriculture. On April 15, 2021, the Regional Water Board) adopted Resolution R1-2021-0006 Groundwater Basin Evaluation and Prioritization Results Supporting Salt and Nutrient Management Planning as Required by the State Water Resource Control Board Recycled Water Policy. In adopting the Resolution, the Regional Water Board did the following: 1) accepted a process for prioritizing and evaluating groundwater basins; 2) accepted priority basins<sup>4</sup> as having a relatively high threat from salts and nutrients; 3) acknowledged that the priority status of groundwater basins may change and the list of priority basins will be updated a minimum of every five years as required by the Recycled Water Policy; 4) acknowledged that the Recycled Water Policy grants the authority to the Regional Water Board Executive Officer to determine priority groundwater basins for salt and nutrient management planning and to update the list of priority basins; and 5) directed staff to proceed with developing a non-regulatory Policy Statement for Groundwater Protection which outlines a range of strategies to protect high groundwater quality and improve degraded groundwater quality within the region and to present the Policy Statement for Board consideration within the shortest time practicable.

The Smith River Plain groundwater basin was identified as a Priority 2 basin for salt and nutrient management planning. Priority 1 and 2 Basins exhibit a relatively high threat from salts and nutrients and thus would benefit from salt and nutrient management planning. Existing and potential beneficial uses applicable to groundwater in the Smith River Plain include, Municipal and Domestic Water Supply (MUN), Agricultural Supply (AGR), Industrial Service Supply (IND), Industrial Process Supply (PRO), Native American Culture (CUL), Freshwater Replenishment to Surface Waters (FRSH), and Aquaculture (AQUA). The Basin Plan also establishes water quality objectives for the protection of these beneficial uses.

### **Discussion of Impacts**

#### **a) Would the project violate any water quality standards or waste discharge**

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<sup>4</sup> Priority Basins: Santa Rosa Plain, Smith River Plain, Scott River Valley, Mad River Lowland, Eureka Plain, Eel River Valley, Anderson Valley, Fort Bragg Terrace Area, Ukiah Valley, Sanel Valley, Alexander Area, Cloverdale Area, Healdsburg Area, Rincon Valley, Wilson Grove Formation Highlands, Lower Russian River Valley, Fort Ross Terrace Deposits

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**requirements?**

No Impact. By requiring the implementation of compliance measures to preserve and maintain shade, control sediment, pesticide and nutrient discharges from Commercial Lily Bulb Operations, the General Order will have an overall beneficial impact on water quality in the Smith River Plain Hydrologic Subarea. Compliance with the General Order will not violate any water quality standards or waste discharge requirements.

**b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

**c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would: 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?**

Less than Significant. Management practices to prevent and minimize the discharge of sediment, nutrients, and pesticides would not reduce groundwater recharge (e.g. interception ditches, vegetative buffers, allowing natural succession of riparian shade, sediment basins, grassy swales). Some management practices such as contour farming, sediment basins, and grassy swales have the potential to cause minor changes to drainage patterns and but not at levels expected to exceed capacity of existing stormwater drainage system on county roads.

**d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?**

No Impact. Requirements of the General Order will be designed to reduce the discharge of pollutants.

**e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

No Impact. Requirements of the General Order further the goals of the Water Quality Control Plan for the North Coast Region. As of the date of this Initial Study, there is no sustainable groundwater management plan nor a requirement for such in the Project Area.

**X. LAND USE AND PLANNING**

Would the project:

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

**Background**

It is not the intention of the Proposed Project to interfere with or supersede any land use plan, policy, or regulation of another agency. Any project implemented under this proposed program should be designed in a manner consistent with other applicable land use plans, policies, or regulations.

The General Order would apply to Commercial Lily Bulb Operations within the Project Area. Del Norte County zoning ordinance for the Project Area stipulates requirements for agricultural land uses. Del Norte County General Plan policies relevant to Commercial Lily Bulb Operations and Natural Resources are summarized in Table 2.

**Table 2. Del Norte County Natural Resources Related General Plan Policies**

POLICY	PROJECT COMPLIANCE
Policy 1.B.1: The County shall seek to maintain, and where feasible, enhance the existing quality of all water resources in order to ensure public health and safety and the biological productivity of waters.	The General Order will implement a program that requires Commercial Lily Bulb Operations to prevent and minimize the discharge of waste which cause or contribute to an exceedance of a water quality objective and therefore is consistent with this policy.

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POLICY	PROJECT COMPLIANCE
<p>Policy 1.B.6: The County shall encourage community programs designed to improve the quality of fisheries and other water resources, including the voluntary incorporation of conservation buffers where pesticide and fertilizer application is a regular occurrence and public outreach and awareness related to home and business opportunities to improve fisheries and water resources.</p>	<p>The General Order will include requirements to allow for natural succession of riparian vegetation within Streamside Areas adjacent to Commercial Lily Bulb Operations and is therefore consistent with this policy.</p>
<p>Policy 1.C.1: The County shall continue its program of establishing riparian corridors for streams identified as habitat areas sensitive to anadromous fish productivity to land outside of the Coastal Zone and within the jurisdiction of the County.</p>	<p>The General Order will include requirements to allow for natural succession of riparian vegetation within Streamside Areas adjacent to Commercial Lily Bulb Operations and is therefore consistent with this policy.</p>
<p>Policy 1.D.7: The County shall work with agricultural interests in the continued development and implementation of best management practices to minimize the impacts of tilling and grading on soil erosion.</p>	<p>The General Order will require implementation of sediment and erosion control management practices and therefore is consistent with this policy.</p>
<p>Policy 1.E.33: The County shall continue to require the use of feasible and practical best management practices (BMPs) to protect streams from the adverse effects of construction activities and urban runoff and to encourage the use of BMPs for agricultural activities.</p>	<p>The General Order will include requirements for vegetative buffers between farmed areas and Streamside areas and is therefore consistent with this policy.</p>

**Discussion of Impacts**



**a) Would the project physically divide an established community?**

**b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

No Impact. The General Order is not a land use regulation and new Commercial Lily Bulb Operations will not be approved by this regulation. The General Order requires that Commercial Lily Bulb Operations implement management practices to reduce nonpoint source pollutants. Reasonably foreseeable management practices are not expected to include the construction of large permanent structures or other features that could divide a community, nor would they physically divide an established community. None of the reasonably foreseeable management practices identified would physically divide an established community.

The primary goal of the General Order is the protection and restoration of water quality and beneficial uses of water in the Smith River Plain. It is unlikely that compliance with the General Order would conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Depending on management practices selected, direct or indirect impacts to existing fish or wildlife habitat are not expected to occur and if they do, they are expected to be minor and temporary. No Habitat Conservation Plans (HCP) or Natural Community Conservation Plans (NCCP) are presently located with the Project Area.

**XI. MINERAL RESOURCES**

Would the project:

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?				X

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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

**Background**

Other than intermittent aggregate extraction along gravel terrace mines alongside the Smith River, no mineral resources or mining claims are located within the Project Area.

The California Surface Mining and Reclamation Act of 1975 (SMARA) required identification of mineral resources in California. The California Department of Conservation is the state agency responsible for implementing and enforcing SMARA regulations and preparing SMARA maps of significant mineral resources in each county. SMARA maps do not exist for Del Norte County.

**Discussion of Impacts**

**a) Would the project 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) Would the project 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?**

No Impact. Compliance with the General Order may include minor earthmoving during grading for implementation of certain management practices (e.g., sediment basin, grassed swale, or contour farming). These projects would be relatively small in scale and would not result in the loss of availability of a known mineral resource or physically preclude future mining activities from occurring. None of the reasonably foreseeable management practices are expected to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or 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.

**XII. NOISE**

Would the project result in:

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Would the Project:	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?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within-the vicinity of a private airstrip or-an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X

**Background**

The Project Area is substantially rural, with a limited number of small communities, the largest being Crescent City.

Existing Commercial Lily Bulb Operations are located in a rural agricultural setting where the main noise sources are from seasonal agricultural activities and nearby public roads and highways. Furthermore, Commercial Lily Bulb Operations are typically located away from schools, hospitals, and other sensitive land uses. Residential uses in or adjacent to agriculturally zoning districts are very low density, consisting typically of only a few residences or small neighborhoods.

Adoption of the General Order may result in an increase in implementation of projects that could involve minor grading and construction (e.g., planting vegetated buffers and construction of detention basins) that may result in local, temporary, construction-related noise emissions above ambient noise levels. Increased noise levels would be limited to the immediate area of grading operation and construction site. Increased noise levels would be limited to the immediate area of grading and construction operations and would not expose sensitive receptors to harmful levels of noise, which are likely to be located substantial distances from a Commercial Lily Bulb Operation. Reasonably foreseeable management practices implemented to

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comply with the General Order are not expected to result in any on-going new noise sources.

The Del Norte County Code includes a Right-To-Farm Ordinance which states that No Agricultural Operation conducted or maintained for commercial purposes, and in a manner consistent with all chapters of the Del Norte County Code and state and federal law, shall be or become a nuisance, private or public, due to any changed condition in or about the locality if such activity did not constitute a nuisance when it began. Further, any changed condition of the use of adjacent land in or about the locality thereof shall not constitute a basis for declaring any agricultural operation as a nuisance; provided, that the provisions of this section shall not apply whenever a nuisance results from the negligent or improper operation of any such agricultural operation and its appurtenances or if the agricultural activity or appurtenances obstruct the free passage or use in the customary manner of any navigable lake, stream, river, canal, or basin or any public park, square, street or highway. Nothing in this definition is to be construed as in any way modifying or abridging any federal, state, or local law relative to nuisances or other regulated activities of the property owner.

### Discussion of Impacts

**a) Would the project generate 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) Would the project generate excessive groundborne vibration or groundborne noise levels?**

**c) For projects 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?**

Less Than Significant. The General Order could involve earthmoving and construction activities by Commercial Lily Bulb Operations. Construction would generally be small in scale, short-term in duration, and could temporarily generate noise above ambient levels. Increased noise levels would likely be associated with heavy equipment operation associated with construction of certain management practices.

For example, noise levels from activities such as road construction and/or maintenance would not exceed the existing levels and the loudest activities from other construction actions can be planned during peak daily noise. Construction timing, equipment types, and noise-generating operations on Commercial Lily Bulb Operations to comply with the General Order would have to be consistent with Del Norte County noise standards which states that mobile noise sources associated

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with agricultural operations, provided such operations do not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or any time on Sunday or a Federal holiday are exempted from the provisions of the noise ordinance. Therefore, construction activities that may result from compliance with the Commercial Lily Bulb Order would not result in substantial noise, are not expected to violate the Del Norte County noise ordinance, and the impacts would be less than significant.

The General Order would not cause any permanent increase in ambient noise levels, including aircraft noise. None of the reasonably foreseeable management practices would be located within an airport land use plan or within two miles of a public airport or public use airport. The use of heavy equipment for the construction and installation of certain management practices could result in temporary increases in existing noise levels, but the noise associated with heavy equipment use is not any louder than noises that would typically occur within the vicinity of a private airstrip. Therefore, it would not expose people living within an area subject to an airport land use plan to excessive noise and thus, no impact would occur.

**XIII. POPULATION AND HOUSING**

Would the project:

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

**Background**

Implementation of the General Order would occur in areas where the dominant land use is agriculture. Commercial Lily Bulb Operations typically contain structures including processing and equipment sheds, wells, roads, and road crossings.

**Discussion of Impacts**

**a) Would the project induce substantial 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) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

No Impact. Actions to implement the General Order would not affect the population of the Project Area. None of the reasonably foreseeable Management practices are expected to induce substantial population growth in the Project Area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). None of the reasonably foreseeable management practices are expected to displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. None of the reasonably foreseeable management practices would displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

**XIV. PUBLIC SERVICES**

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Would the Project impact:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
Fire protection?			X	
Police protection?				X
Schools?				X
Parks?				X
Other public facilities?				X

**Background**

This section characterizes existing and proposed public services in the Project Area and evaluates changes that may result from actions to comply with the General Order. Public services include services that address community needs and are usually provided by local or regional government, although they may be provided through private contracts. Public services include fire and emergency response, police protection, airports, schools, libraries, and parks.

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The unincorporated area of the Project Area is served by three Regional Fire Protection Districts with nearly a dozen stations. The Smith River Plain is served by the Del Norte County Unified School District consisting of 11 schools: eight elementary schools, a middle school, and two high schools. The Del Norte County Sheriff, California Highway Patrol, and City of Crescent City Police provide law enforcement in the Project Area.

### **Discussion of Impacts**

**a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services: i) Fire protection?**

Less Than Significant. Logically, the increase in riparian vegetation increases the fuel loads for wildfires. While fuel loads do not cause fires, the increasing mass available can increase the severity of a fire and could impact the demand on fire protection services. In general, agricultural lands tend to function as fire breaks and fire crews use these lands to their advantage to ensure that they can stop the spread of the fire or stop the front of the fire from coming through (Cal Fire 2017). However, many Growers have voluntarily implemented riparian setbacks resulting in expanded riparian shade and vegetated buffers thus the expansion of riparian vegetation is expected to be limited. Therefore, the potential impacts to fire protection public services are less than significant.

**ii) Police protection; iii) Schools; iv) Parks; v) Other public services ?**

No Impact. The General Order would not result in adverse impacts on police services or on schools and parks since the General Order is not growth inducing nor does it involve construction of substantial new government facilities or the need for physically altered government facilities. While the General Order includes provisions that may result in temporary and minor construction activity, these activities are not expected to affect roads used for public safety or fire protection service vehicles. Therefore, the General Order would not result in changes to roadway networks on private property that would affect service routes, response times, or other performance objectives for any public services. The General Order does not involve new or physically altered government facilities. Because the proposed project does not involve these elements, therefore, the appropriate finding is no impact.

**XV. RECREATION**

Would the Project:	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?				X
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?				X

**Background**

The Regional Water Board implements water quality protection programs designed to result in water quality suitable for full contact water recreation such as swimming and surfing (REC-1), as well as non-contact water recreation (REC-2). Other beneficial uses potentially relevant to recreational uses include Navigation (NAV), Commercial and Sport Fishing (COMM), and Shellfish Harvesting (SHELL). As a predominantly rural region, the Smith River Plain offers recreational opportunities in addition to water-related activities, including camping, hiking, horseback riding, bike riding, and bird watching.

The California Department of Parks and Recreation, County of Del Norte, and other private parties support, own, and/or operate parks and recreational facilities in the Project Area. These facilities provide a variety of outdoor recreational, educational, and sporting opportunities for local residents and visitors around the world.

**Discussion of Impacts**

**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?**



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No Impact. Reasonably foreseeable management practices implemented in response to the General Order would occur on Commercial Lily Bulb Operations and are not expected effect on existing neighborhood and regional parks or other recreational facilities. Therefore, no impacts would occur.

**XVI. TRANSPORTATION**

Would the project:

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?				X
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				X
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
e) Result in inadequate emergency access?				X

**Background**

The Project Area is serviced by District 1 of the California Department of Transportation (CalTrans). Highway 101 is the major highway corridor from north to south. The highway corridor consists of two and four lane segments, vulnerable to traffic delays when road work is undertaken. City, County and private roads serve the urban and rural areas and are generally two-lane roads.

The General Order does not contain specific requirements to improve private roads serving Commercial Lily Bulb Operations; however, if improvements to private roads were undertaken in response to the General Order they would occur on roads under the control of private landowners and operators and would not affect public roads or maintenance easements.

**Discussion of Impacts**

- a) Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**
- b) Would the project conflict with an applicable congestion management program, including but not limited to, level of service standards and travel demand measures and other standards established by the county congestion management agency for designated roads or highways?**
- c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**
- d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**
- e) Would the project result in inadequate emergency access?**
- f) Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?**

No Impact. The General Order may result in temporary and minor increases in truck traffic. Where implementation of reasonably foreseeable management practices requires soil disturbance, minor short-term additional vehicular traffic could increase on roads serving Commercial Lily Bulb Operations. Construction may require importing construction materials such as gravel, pipe, or compost and would require the use of trucks. Minor construction-related truck traffic is likely to be limited in number and duration, be in rural settings, and would likely not occur during peak traffic periods. Any increase in traffic would be minor, temporary and would be limited to local areas in the vicinity of individual projects and would not create substantial traffic increases on existing street systems. Construction activities have the potential to increase traffic volumes or reduce speeds on public roads. However, no road design or construction hazards would occur or result in roads that are incompatible with Commercial Lily Bulb Operations.

The proposed project does not involve installation of hazardous design features and will not affect emergency access or parking capacity. The General Order would not result in increased air travel or otherwise affect air travel. The Proposed Project will not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Because the Proposed Project does not involve these elements, the appropriate finding no impact.

## **XVII. TRIBAL CULTURAL RESOURCES**

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,

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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:

Would the Project:	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)		X		
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

**Background**

The ancestral Tolowa people lived in the Project Area before the arrival of white settlers. Today, the Tolowa Dee-ni' and Yurok peoples have organized on the Smith River plains into two federally-recognized tribal governments: the Tolowa Dee-ni' Nation and Elk Valley Rancheria. Tolowa ancestral land lays along the Pacific Coast between the watersheds of; Wilson Creek and Smith River in California and the Winchuck, Chetco, Pistol, Rogue, Elk and Sixes Rivers, extending inland up the Rogue River throughout the Applegate Valley in Oregon. By the use of the rivers, sea and the land the ancestral Tolowa people produced a rich and highly developed culture. Salmon, whale, seal, clams, deer, elk, eggs and duck provided a diet rich in protein. Acorns, berries, seaweed, and vegetables supplied them with carbohydrates. The Tolowa Dee-ni' Nation has assumed the responsibilities of the State Historic Preservation Office to review and comment on federal, state, and local projects within our tribally owned lands and ancestral territory which may have impacts on cultural resources.

**Discussion**

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Tribal resources are known to exist in the Project Area. Many of the reasonably foreseeable management practices that could be implemented under the Proposed Project would have little to no potential to impact Tribal Cultural Resource (TCRs). For example, practices such as applying less fertilizer, applying pesticides per labeling directions, and other similar practices would not impact TCRs. These activities would take place within existing agricultural lands and would not substantially change any landscape, site, or place that could have tribal cultural significance. Likewise, many of the monitoring and reporting activities that could occur under the Proposed Project (e.g., surface water monitoring, pedestrian, and vehicle trips to monitoring sites, groundwater sampling and analysis via existing wells) would have no potential to substantially affect TCRs.

While Proposed Project activities would have limited to no potential to substantially affect sites, features, places, or cultural landscapes that could be TCRs, certain activities could potentially affect buried objects or materials that could be TCRs. Construction/installation of reasonably foreseeable management practices that involve ground disturbance (e.g., sediment basins and vegetated filter strips) could potentially uncover buried TCRs. However, while most activities would occur within existing lily fields, it is possible that certain management practices could be constructed/installed in areas adjacent to existing lily fields that have not been subject to prior disturbance. Facilities such as sediment basins could be installed on the periphery of fields to receive runoff and could be placed in undisturbed areas. Additionally, certain management practices, although located within existing lily fields, could be installed to depths below the prior disturbance limits (e.g., excavation for construction of a sediment basin could disturb soil to five feet deep, whereas routine disturbance from tilling and other activities only reaches to two feet deep). These types of activities could potentially impact TCRs if they were present within the proposed disturbance area and proper protocols were not followed.

Where management practices involve modifications to previously undisturbed soils (i.e., below the levels of current agricultural practices, or in areas that have not previously been cultivated or developed), mitigation measures such as retaining an archeologist to perform a records search and potentially a pedestrian survey will be included in the General Order. If cultural resources are identified, relocating or redesigning the management practice will be required to avoid the resources as are expected to reduce impacts to less than significant.

### **XIII. UTILITIES AND SERVICE SYSTEMS**

Would the project:

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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 of which could cause significant environmental effects?				X
b) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				X
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				X
e) Comply with federal, state, and local statutes and regulations related to solid waste?				X

**Background**

Wastewater services in the Project Area are provided by the City of Crescent City in the extreme southerly part of the Project Area, by the Tolowa Dee-Ni' Nation for their tribal housing project, and by individual sewage disposal systems elsewhere. Domestic water is supplied by several municipal water suppliers to the urban and rural residential area with private domestic wells or surface water diversions elsewhere. No active landfills are located within the Project Area.

The Project Area is served by public services including fire and police protection,

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schools, parks, a wastewater treatment plant, and other public facilities (refer to discussion in Section XIV above).

**Discussion of Impacts**

**a) Would the project 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 of which could cause significant environmental effects?**

**b) Does the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

**c) Would the project 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) Would the project 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) Does the project comply with federal, state, and local statutes and regulations related to solid waste?**

No Impact. The General Order does not include relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. Reasonably foreseeable management practices would not include construction of new or expanded municipal stormwater drainage facilities or other drainage system affecting any non-agricultural activities. Changes to agricultural practices on Commercial Lily Bulb Operations would reduce erosion, sedimentation, peak runoff, and flooding, all beneficial environmental effects.

The General Order would not increase population or provide employment; therefore, it would not require an ongoing water supply. It would also not require ongoing wastewater treatment services and would not substantially affect municipal solid waste generation or landfill capacities; therefore, no impacts would occur.

The use of vegetative buffers and grassed swales may require additional irrigation water but may also result in reduced evaporation from soil surfaces, resulting in no or little net change in irrigation water needs.

None of the reasonably foreseeable management practices implemented in response to the General Order are likely to generate a significant source of solid

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waste. Implementation of temporary erosion and sediment controls following construction of sediment basins or grassed swales will be very minimal and could therefore be served by an existing landfill. The reasonably foreseeable management practices implemented by Commercial Lily Bulb Operations are not expected to result in any significant changes in the generation of solid waste and therefore should not affect compliance with federal, state, or local statutes and regulations related to solid waste. Therefore, the appropriate finding is no impact.

**XIX. WILDFIRE**

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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?				

**Background**

This section evaluates the potential wildfire-related impacts of implementing the General Order. The analysis considers both direct and indirect wildfire risks

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associated with the order's implementation and compliance measures. characterized by a mix of coastal areas, river valleys, and forested mountains. The Project Area climate is generally cool and wet, with significant rainfall particularly in winter months. However, climate change has increased wildfire risks even in historically low-risk areas. Key features relevant to wildfire risk in the Project Area include agricultural lands, the Smith River and coastal streams, existing riparian corridors, rural communities interspersed with wildland-urban interface (WUI) zones, and seasonal variations in precipitation, with drier conditions typically occurring from June to September

### Discussion of Impacts

#### **a) Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?**

No Impact. The General Order does not include requirements which are expected to impact public roads and therefore emergency access.

#### **b) Would the Project 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?**

No Impact. While the General Order includes requirements to allow natural succession of riparian vegetation and vegetated buffers in Streamside Areas, it allows for vegetation management in Streamside Areas consistent with State and Local fire-safe requirements. Furthermore, riparian vegetation adjacent to streams and wetland areas usually has a higher moisture content than surrounding vegetation and it is speculative that allowing natural succession of riparian vegetation would substantially increase wildfire risk.

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

No Impact. The General Order does not require new infrastructure that would exacerbate fire risk. Existing access routes will be maintained, and the General Order allows for necessary vegetation management.

#### **d) Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

No Impact. General Order Streamside Area requirements related to riparian vegetation and buffers are expected to improve soil stability and reduce erosion risks. The ability to manage vegetation for fuel reduction further mitigates potential post-fire risks.



**XXI. MANDATORY FINDINGS OF SIGNIFICANCE**

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		X		

**Background**

The General Order regulates discharges from Commercial Lily Bulb Operations. General Order requirements and implementation of reasonably foreseeable management practices are not expected to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California

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history or prehistory. Other actions within Del Norte County that may, together with the General Order, affect the environment, are listed below.

### Del Norte County General Plan Natural Resources Element Policies

#### California Coastal Act

The adoption of the General Order would not result in the relaxation of water quality standards and would reduce nonpoint source pollutant discharge from Commercial Lily Bulb Operations (existing conditions).

### Discussion of Impacts

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

Less Than Significant. Reasonably foreseeable management practices implemented in response to the General Order are expected to improve water quality from the current baseline in the watershed.

Reasonably foreseeable management practices that require work in State or Federal waters would undergo consultation with federal, state, and local agencies. Specific mitigation measures would be applied by the agencies to avoid impacts to rare, threatened, or endangered species. See Biological Resources section for more discussion of potential impacts to fish and wildlife.

**b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

Less Than Significant. Cumulative impacts, defined in section 15355 of the CEQA Guidelines, refer to two or more individual effects, that when considered together, are considerable or that increase other environmental impacts. Cumulative impact assessment must consider not only the impacts of the General Order but also the impacts from other regulatory, municipal, and private projects, which have occurred in the past, are presently occurring, and may occur in the future, in the Smith River Plain during the period of implementation.

Reasonably foreseeable management practices which do not involve soil disturbance are not likely to have cumulative impacts on the environment. Impacts associated with implementation reasonably foreseeable management practices

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involving soil disturbance will be small scale, temporary, and will not have significant adverse effects on the environment.

**c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.**

Less Than Significant. As explained previously, the General Order is designed to improve long term water quality by providing a regulatory program designed to protect and restore water quality and the beneficial uses of water in the North Coast Region. Based on the analysis provided in this Initial Study there are potential impacts that could adversely affect humans associated with soil disturbances that may adversely affect cultural resources. However, implementing mitigation measures to reduce impacts to cultural resources will likely prevent these potential impacts to less than significant. Also, it is unlikely that all Commercial Lily Bulb Operations will simultaneously implement management practices on the approximately 1,000 acres of fields planted in a seasonal rotation that result in the use of heavy equipment through the implementation of reasonably foreseeable management practices and therefore generate levels of emissions, dust, or particulate matter above baseline levels that cause a significant adverse effect to nearby receptors. For cultural resources, if ground disturbing activities occur within previously undisturbed soils or uncover previously undiscovered or documented resources, implementing mitigation measures including cultural resources investigations and proper notifications to the California Historical Resources Information System will likely reduce the level of impact to less than significant.

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