

Draft Initial Study North Coast Trails Plan

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Prepared for: Sonoma County Regional Parks Department
2300 County Center Drive, Suite 120-A
Santa Rosa, California 95403

Prepared by: Leonard Charles and Associates
7 Roble Court
San Anselmo, California 94960
(415) 454-4575

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1.0 Introduction and Background

This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code 21000 *et seq.* and the State CEQA Guidelines, California Code of Regulations Section 15000 *et seq.* The proposed Project includes construction and operation of two trail segments, a 1.1-mile trail on the Kashia Coastal Reserve and a 0.9-mile trail on the Stewarts Point Ranch. The Project will be built on trail easements conveyed to Sonoma County Regional Parks (SCRPs) as part of the conservation agreements for the two properties. The proposed Project also includes construction of facilities needed to support public use of these trails, including bridge replacement, parking areas, restrooms, gates, fencing, and informational and trail signs (these improvements are hereafter called the “Project”). The two trail segments will be part of the California Coastal Trail that will eventually extend from the Mexican border to the Oregon border.

2.0 Project Location and Setting

The Project would be developed on two separate properties—the Stewarts Point Ranch and the Kashia Coastal Reserve. These properties (hereafter collectively called the Project site) are located on the west side of State Highway 1 in northwest Sonoma County approximately 30 miles northwest of the City of Santa Rosa, 20 miles north of the unincorporated community of Jenner, and approximately one mile south of the southern end of the unincorporated community of The Sea Ranch. The Project site is shown on the Annapolis and Stewarts Point 7.5-minute topographic quadrangles, within Township 10N and Range 14W. The Kashia Coastal Reserve is situated in the northwestern portion of Annapolis topographic quadrangle. The Stewarts Point Ranch Trail is situated in the southeastern portion of the Stewarts Point topographic quadrangle. Access to both properties is via State Highway 1 (SR1) with secondary access to the east via Stewarts Point-Skaggs Spring Road. In general, this stretch along SR1 is defined by rangelands, undeveloped private property, open space, parks, and, to the east, timberlands.

The 52-acre Kashia Coastal Reserve (AP No. 122-290-001) is located adjacent to the north border of Salt Point State Park. The site is a coastal terrace between SR1 and the ocean. The site is characterized by undeveloped open space; the main vegetation types are Bishop pine forest and coastal terrace grassland communities. Historically it was used for livestock grazing. The only structure on the property is a barn immediately adjacent to the highway.

The 105-acre Stewarts Point Ranch (AP No. 122-250-006) is located approximately 2.5 miles north of the Kashia Coastal Reserve, extending north from the intersection of Stewarts Point-Skaggs Spring Road with SR1. Like the Kashia Coastal Reserve, this Project site is on a coastal terrace between the ocean and SR1. Vegetation is primarily grassland communities. This property contains a main barn, a smaller barn, a cottage, and several other small ranch structures. There is a residence adjacent to the north side of the Stewarts Point Ranch as well as two residences and store adjacent to the south side of the ranch property. One ranch road leads from the property entry along SR1 to the main barn, and a number of other informal roads cross the property.

Both properties are characterized by coastal terrace geology, open grassland habitats, minor seasonal drainages and coastal wetlands. Several special status species of flora and fauna are known to occur in both Project areas, and there are culturally significant resources and tribal gathering areas associated with the Kashia Band of Pomo Indians of the Stewarts Point Rancheria.

3.0 Proposed Project Description

Project Objectives

Currently, there is no public access along the six miles of coast between Salt Point State Park and Sonoma County Regional Parks' Black Point Coastal Access Trail at the Sea Ranch. This Project will offer public access to that area while protecting grasslands, wetlands, and sensitive biological resources. The Project will provide protection of culturally significant resources, tribal gathering areas, and other tribal cultural resources associated with the Kashia Band of Pomo Indians of the Stewarts Point Rancheria. The State Coastal Plan and the County Coastal Plan call for the creation of a 1,200-mile coastal trail system (officially called the California Coastal Trail). The current Project will help the County and State meet the access objectives of the Coastal Plan. The Project will not interfere with the ability of the Kashia Band of Pomo Indians of Stewarts Point Rancheria to practice their cultural and ocean-side traditions.

The Project is a partnership between the California Coastal Conservancy (Conservancy), the Sonoma County Agricultural Preservation & Open Space District (District), the Kashia Band of Pomo Indians of Stewarts Point Rancheria (Tribe), Save the Redwoods League, and Sonoma County Regional Parks (SCRIP). In December 2015, the Tribe conveyed a Conservation Easement to the District. The proposed trail alignment lies within this mapped easement with the exception of a small portion that is within the right-of-way of SR1. The owners of

the Stewarts Point Ranch conveyed a Trail Easement on that property to the District, and the proposed trail is within that easement except, again, for a small portion that would be constructed in the SR1 right-of-way.

Project

The proposed Project consists of two separate segments of the 1,200-mile California Coastal Trail (CCT), totaling about two miles in length. Implementation of the trails project (Project) will provide safe public trail access, while avoiding and minimizing potential impacts to the sensitive biological and cultural resources found along the coastal terrace. The two trail segments are about 2.5 miles apart and consist of the 0.9-mile Stewarts Point Trail and the 1.1-mile Kashia Coastal Reserve Trail (Kashia Trail) (Figure 1). Both are located west of State Highway 1 (SR1) on a gently sloping to rolling coastal terrace. The Project does not provide access to the beach; beach access is available at Salt Point State Park and the Sea Ranch Coastal Access Trails.

The trail segments will be constructed as a partnership among the California Coastal Conservancy (Conservancy), the Sonoma County Agricultural Preservation & Open Space District (District), the Kashia Pomo Tribe (Tribe), Save the Redwoods League, and SCRIP. The Project includes the implementation of a Trail & Facilities Plan (Trail Plan), with trail designs based on environmental resource, geotechnical, hydrologic, traffic, and engineering studies and analysis, stakeholder and community engagement, regulatory permit consultations, and related work for the Kashia Coastal Reserve and Stewarts Point Ranch Trails.

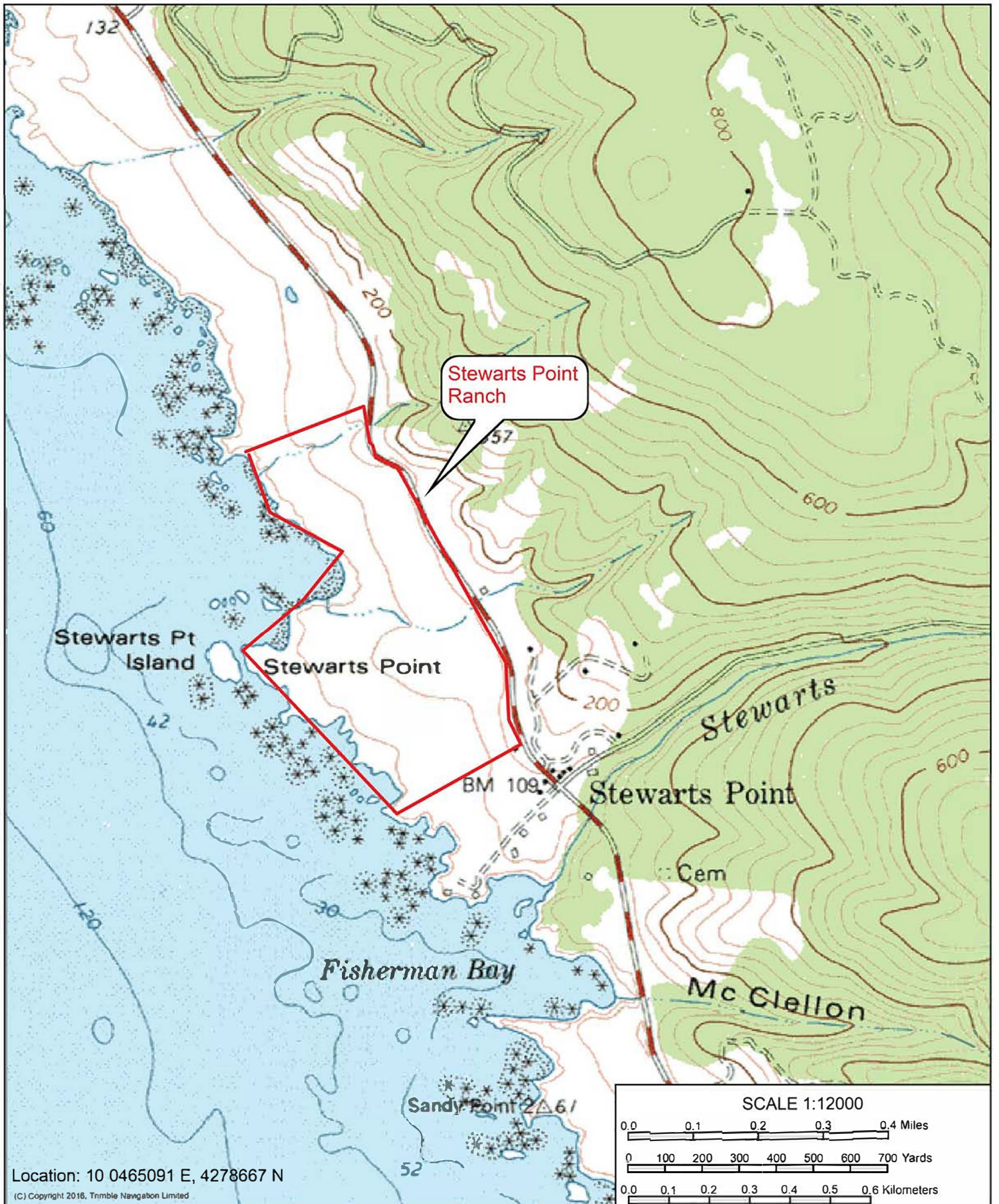
Location

The Stewarts Point Trail begins at the south end of the Sea Ranch community (approximately 100 feet north of Caltrans Postmile (PM) 48.6) and ends just north of the Stewarts Point General Store (PM 48.2) (Figure 2a). The Kashia Trail (Figure 2b) is located between the northern end of Salt Point State Park at Horseshoe Cove (about 5.5 miles north of Ocean Cove). The trails will be located on easements obtained from the Kashia Tribe and the Faulk family, owners of Stewarts Point Ranch.

Description of Project Components

The Project consists of trail construction, staging areas, fencing, restroom and site amenities. Drainage crossings will be installed across seasonal drainages on both sites. The locations of these features are shown on the trail plans (Appendix A).

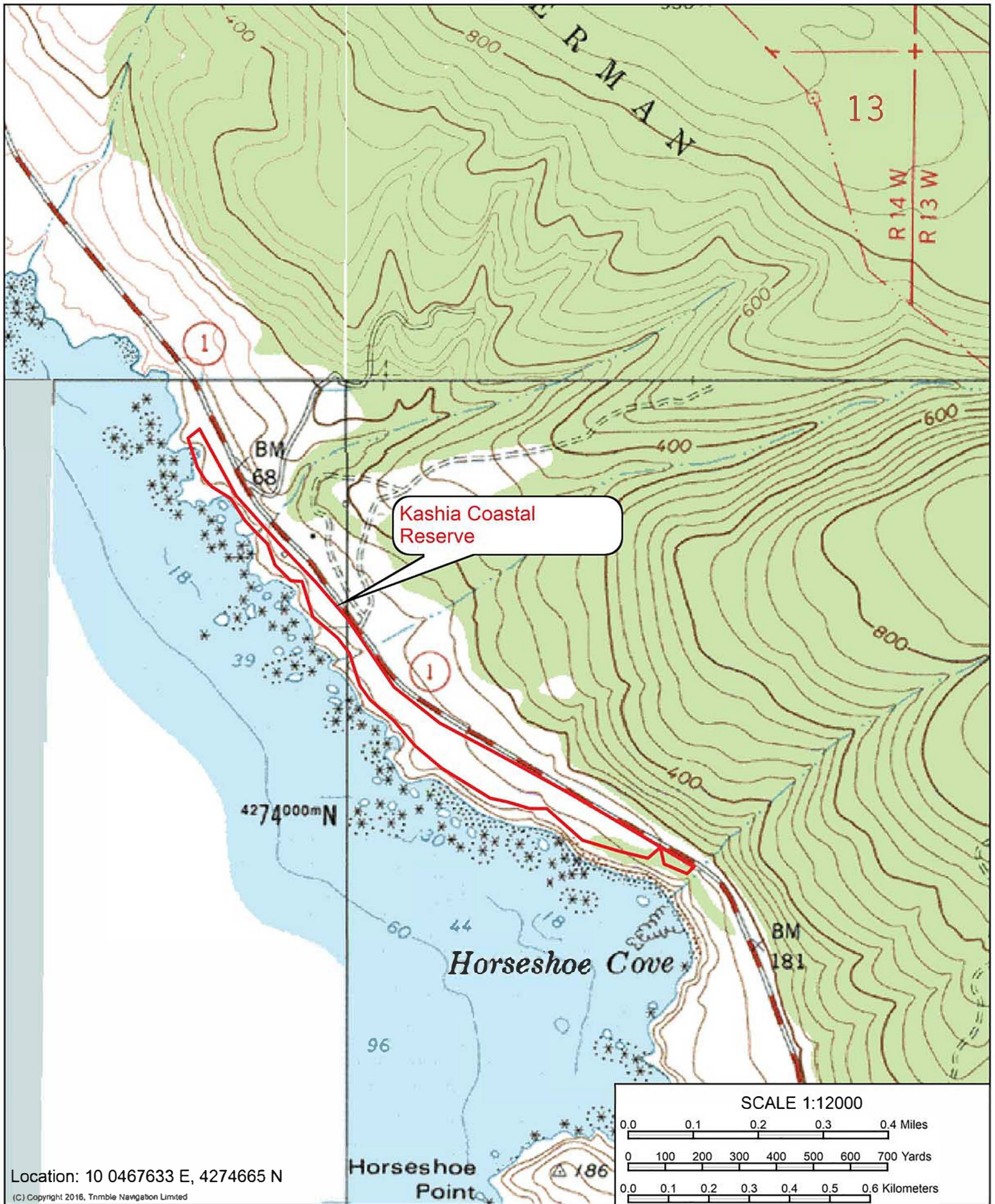




STEWARTS POINT PROJECT AREA
NORTH COAST TRAILS PROJECT
 SONOMA COUNTY, CA



FIGURE 2A



Location: 10 0467633 E, 4274665 N

(C) Copyright 2016, Trimble Navigation Limited

KASHIA TRAIL PROJECT AREA
 NORTH COAST TRAILS PROJECT
 SONOMA COUNTY, CA



FIGURE 2B

Trail. The Stewarts Point Trail would consist of a 5-foot-wide natural surface hiking-only trail. The Kashia Trail would consist of a 5-foot-wide trail with a natural trail surface (**Figure 3**). Earthwork, grading and importation, placement, compaction and stabilization of aggregate base rock would be placed on the alignment to create a firm and stable surface that is in compliance with accessibility regulations.

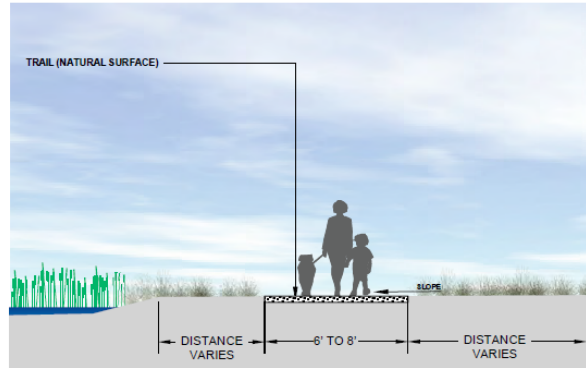


Figure 3. Typical Trail Section

Second Phase of Trail. The trail map for the Project shows a northern extension of the Stewarts Point Ranch Trail that extends from the main trail to Highway 1 north of the proposed parking lot (shown on Appendix A, sheets 2 and 7). This northern extension would be constructed in a second phase of the Project. No schedule for constructing this phase has been determined. This Initial Study addresses the environmental impacts of that segment of the trail.

Drainage Crossings. Bridges and other drainage and wetland crossing features will be constructed along both trails to provide safe, year-round public access and to avoid or minimize impacts to the sensitive biological and cultural resources found along the coastal terrace. The drainage structure type, width and length were designed to minimize impacts to existing drainages and accommodate anticipated surface and subsurface flows.

Drainage Crossing Types. Four types of drainage structures will be installed to cross the drainages on each site (Figure 4):

- **Armored Crossing.** Armored crossings consisting of a rock layer placed within the flow area and would be used to cross drainage swales.
- **Drainage Lens.** A drainage lens consists of a rock layer placed at or above existing grade to provide a firm and stable trail surface base. Surface drainage flows through the rock layer.
- **Puncheon Bridge** (a wood stringer and deck structure up to 16-feet long) that spans across the drainage) will be used to cross wider wetlands and drainages, where the drainage bottom is generally less than 30-inches deep.
- A pre-engineered **Clearspan Bridge** would be installed to cross a deeper, un-named drainage feature near the north end of the Kashia Trail and within one Stewarts Point trail segment.

Staging Area. The Project includes a trailhead staging area for each trail segment, and a pre-engineered vault restroom (Figure 5) and picnic facilities at the Kashia staging area. Operational signage will provide information regarding rules and regulations for using the trail. These signs designate the hours the trail is open, prohibited activities such as use of motorized vehicles on the trail, and other regulatory and public safety information and warnings.



Figure 5. Proposed Restroom

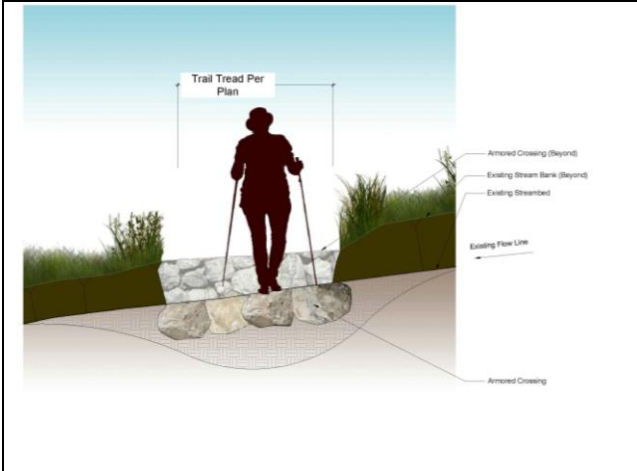
Trail Fencing. Wire fencing (Figure 6) or grape stake fencing (similar to the existing fencing shown in Photo 4 of that Stewarts Point Ranch staging area in the subsequent Aesthetics subsection) would be installed around the parking lot and trailhead on the Stewarts Point Ranch. Grape stake fencing would also be installed along one side of the trail on the Stewarts Point Ranch to control livestock grazing. Wire fencing or grape stake fencing would also be used to prohibit trail users from accessing sensitive bluff areas.



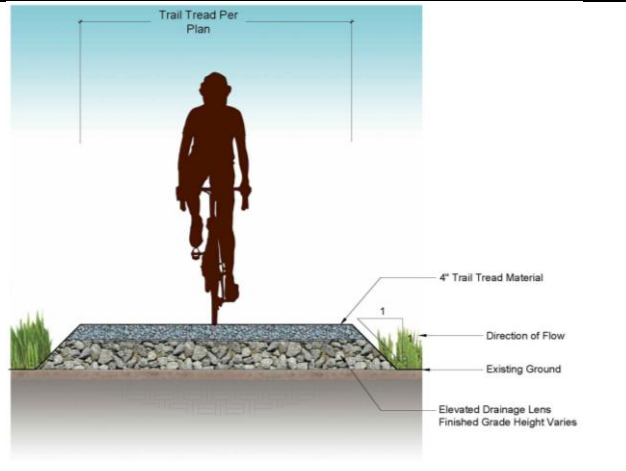
Figure 6. Wire Fence

The bottom strand of the wire fencing could consist of smooth wire, set at minimum 6 inches above the ground to allow wildlife undercrossing. Gaps would be left in grape stake fencing to allow wildlife movement. New gates would be installed where existing dirt roads or travel ways cross the proposed trail alignments. As the Kashia property is not currently grazed, only split rail fencing would be required around the staging area.

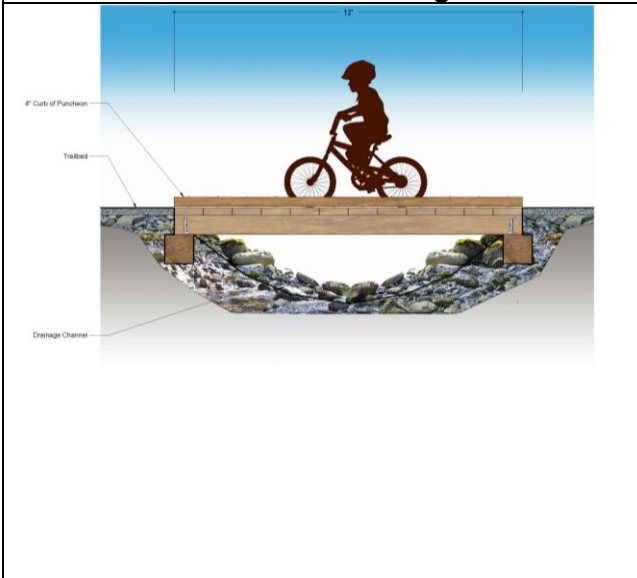
Improvements within Highway 1 Right of Way. Portions of both trails will be located within unimproved Caltrans Right of Way, including approximately 1,000 feet of trail in both segments, driveway apron improvements, and directional signage. This work will be coordinated with Caltrans. This includes:



Armored Crossing



Drainage Lens



Puncheon



Fiberglass Bridge



Wood Bridge

Clearspan Bridge

Figure 4. Drainage Crossing Types

- Stewarts Point northern trailhead: 50 linear feet (LF)
- Kashia Trail northern trail head: 171 LF
- Kashia Trail segment near historic bridge: 178 LF
- Kashia Trail southern trail end: 430 LF

Habitat Avoidance and Protection. The trail alignments have been sited to minimize and avoid impacts to known sensitive cultural and biological resource areas.

Both sites are characterized by coastal terrace geology bounded by steep coastal bluffs, generally open grassland habitats, minor seasonal drainages and coastal wetlands along larger drainage features. Highway 1 is a County-designated scenic view corridor, which requires the careful placement of structures and facilities to minimize visual impacts to coastal resources. In addition, several special status species of flora and fauna are known to occur in both Project areas, and there are culturally significant resources and tribal gathering areas associated with the Kashia Pomo Tribe of the Stewarts Point Rancheria. The Tribe has the right to close the trail periodically for ceremonial events and is required to notify the SCRCP well in advance of proposed trail closure. The Tribe will continue to be consulted at all stages of the planning and Project implementation process to ensure the transparent sharing of information, in order to better inform the Project final design and construction, and to respect ceremonial tribal lands. To minimize potential environmental impacts, particularly in culturally sensitive areas, trail segments may be elevated on a geotechnically-stabilized foundation back-filled with light-weight materials to minimize subsurface disturbance and to distribute load, so as not to damage any culturally significant sub-surface materials.

The prefabricated bridge would clear span across the low flow channel, with the foundation located on a stabilized upland terrace. Less than 800 square feet of state and federal jurisdictional wetlands will be permanently disturbed as a result of trail facilities implementation. Project work would also include restoration and enhancement of up to 2,000 square feet of seasonal wetlands and waters of the United States and California (waters of the U.S.) that may be temporarily impacted by wetlands and drainage crossings. Enhancement plantings would be located at each site and consist of species native to the Kashia-Stewarts Point area, and the restoration area would be maintained and managed as part of the trail Project.

Proposed trail improvements are summarized as follows:

Stewarts Point Ranch Trail

- Hiking-only trail of compacted earth or stabilized quarry fines and associated site furnishings
- Clearspan bridge
- Drainage crossing(s)
- Fenced parking and staging area with parking for 9 vehicles, including one ADA van-accessible space and associated site furnishings
- Interpretive and directional signage
- Grape stake fencing to secure grazing areas
- Habitat mitigation and enhancement Area

Stewarts Point Ranch Trail Project

Component	Quantity	Length (ft)	Area (sq. ft)
5-foot-wide Hiking only Trail and associated site furnishings	N/A	5,000	25,000
6-foot-wide Bridge	1	40	240
Drainage Crossings	9	N/A	N/A
Drainage lens (width varies)	8	86	430
Armored crossing (width varies)	1	18	144
Staging Area	1	N/A	4000
Signage and site furnishings	5	N/A	N/A
Fencing	N/A	5,300	N/A
Habitat Mitigation and Enhancement Area	N/A	N/A	1,000

Kashia Coastal Reserve Trail

- Multi-use compacted trail of earth or stabilized quarry fines and associated site furnishings
- Clearspan bridge(s)
- Drainage crossings
- Fenced parking and staging area with parking for 8 vehicles, including one ADA van-accessible space
- Split rail fencing and pipe gates
- Picnic area with three tables and associated site furnishings
- Restroom (Pump-out vault toilet <100 square feet)
- Interpretive and directional signage
- Habitat Mitigation and Enhancement Area

Kashia Coastal Reserve Trail Project Components

Component	Quantity	Length (ft)	Area (sq. ft)
5-foot-wide Trail	N/A	6,300	31,500
6-foot-wide Bridge	1	30	180
Drainage Crossings	5	N/A	N/A
Drainage lens (width varies)	3	145	725
Puncheon Bridge (width varies)	2	20	100
Staging Area	1	N/A	10,000
Signage and site furnishings	6	N/A	N/A
Fencing (Parking and Staging Area only)	N/A	500	N/A
Habitat Mitigation and Enhancement Area	N/A	N/A	1,000

Jurisdictional Wetlands. Federal wetlands are within the jurisdiction of the U.S. Army Corps of Engineers. State wetlands include federal jurisdiction wetlands and the additional area that meet the one parameter criteria under the Coastal Commission guidelines for determining wetlands. Temporary impacts will be the result of construction activities. Permanent impacts are associated with permanent Project elements. In both federal and state wetlands, permanent impacts would be from the bridge footings. The puncheons and drainage lenses may be considered permanent impacts due to shading or rock placement.

Plant Communities. Temporary impacts are associated with construction activities and these areas will be restored to their pre-construction condition after construction activities are completed. Restoration will include installation of sediment and erosion control, as needed, and seeding with a native seed mix specifically selected for the Coastal Prairie plant community. Permanent impacts are associated with permanent Project elements.

Construction. Project construction (except for the northern spur of the Stewarts Point Ranch Trail) would occur over two construction seasons (approximately 4-6 months between April 1 and November 30). Bridge, drainage crossings, and trail construction work would follow nesting bird and wet weather/creek flow restrictions on both ends of that timeline. Construction staging would occur within the generally flat area adjacent to the proposed parking areas and near the proposed pedestrian bridge. Construction would require operations within 10 feet of the trail edge, so that in some disturbance could occur in a 25-foot-wide corridor along the trail alignment. At Stewart's Point (as shown on the trail plans), in the vicinity of drainage improvements, such as bridges, the disturbance

area is slightly wider for construction and maintenance purposes. During the construction period, the existing Highway 1 pull-over parking areas would likely be closed for short periods, but lane closure of SR1 is not anticipated.

Construction Schedule and General Methodology. SCRCP expects that Project construction will be phased during 2021 and 2022 or later. Due to the various resources that will be affected within the Project area, some construction tasks, such as clearing vegetation outside of the active seasons for birds and American badger, may occur months ahead of the remaining tasks. Earth-moving tasks will occur during the dry-season to avoid impacts to sensitive species. Project construction will take approximately 6 to 8 months to complete after the limited earth-moving tasks are initiated. After construction of Project facilities is complete, the areas disturbed by construction activities will be restored to their pre-construction condition.

Construction Equipment. Equipment for Project construction will include cement trucks, dump trucks, small graders, small track excavators, loaders, and possibly a small-to-mid-sized hydraulic crane to lift bridges in place. The prefabricated bridge segments will be delivered to the Project site using a standard semi-truck trailer. Low ground-pressure track skid-steer hydraulic equipment, such as a light-weight mini-excavator with an auger attachment, will be used to drill holes for the bridge footings. The foundation piers may also be drilled using portable gas-powered drilling equipment or drilling equipment connected to hydraulic hoses to a remote power trailer. This equipment and methods will be employed to reduce disturbances to sensitive wetland and riparian areas.

Construction activities will occur during daylight hours, between 7:00 a.m. to 7:00 p.m., Monday through Friday. SCRCP may authorize construction activities on weekends or beyond the regular construction hours in order to address emergency and unforeseen circumstances or to accommodate an accelerated construction schedule, as needed.

Trail Operation. Both trail areas would be operated and maintained by SCRCP in association with their trail partners. Since the trails are semi-improved, periods of winter wet weather closure may occur at both facilities. Trail facilities for the Kashia Trail are also subject to temporary closure for exclusive use by the Kashia Band of the Pomo Indians for ceremonies. The Stewarts Point Ranch Trail is restricted to hiking, and dogs will not be allowed. Livestock grazing may continue within fenced areas in both trail segments.

Required Approvals

Sonoma County Regional Parks will be the lead agency under CEQA to review the proposed Project. Prior to construction, the Project will need permits or approvals from the following Responsible or Trustee Agencies:

1. California Fish & Wildlife will require a 1600 Lake and Streambed Alteration, LSA
2. North Coast Regional Water Quality Control Board will require a 401 Water Quality Certification
3. California Coastal Commission may require a Coastal Development Permit to construct the proposed Project.
4. California Department of Transportation (Caltrans) may require an encroachment permit for construction of Project improvements within the SR1 right-of-way.
5. The U. S. Army Corps of Engineers (Corps) will require a Nationwide Permit/or Individual Permit under Section 404 of the Clean Water Act for impacts to on-site wetlands.
6. U.S. Fish and Wildlife Service (USFWS) may require an Incidental Take Permit for species listed under the Federal Endangered Species Act that are under their jurisdiction.
7. Permit Sonoma will require a building permit for bridge, abutment, and restroom construction, and ADA and Architectural Barriers Act compliance.

Summary of Public Outreach Process

On February 13, 2019, SCRCP issued a Press Release announcing a Community Meeting to be held at the Ft. Ross Elementary School ,30600 Seaview Road, Cazadero CA to introduce the Project to the community and gather community input.

On February 23, 2019, SCRCP conducted the Community Meeting with assistance from the project design team (Questa Engineering). The SCRCP staff and the design team introduced the Project and preliminary design concepts including environmental resources and constraints on the site, the trail easement corridor and preliminary trail alignment, other planned improvements, proposed uses and use restrictions. Staff and the design team answered questions from community members and explained the next step in the planning process.

A number of attendees asked questions and offered suggestions for trail planning. Primary comments beyond straightforward questions about involved concerns about trail components included the following:

- Need for active educational signing about staying on the trail and not trespassing
- Need for education of users about calls for emergency response and coordination with emergency responders

Need for active patrolling to address trespass and other illegal activities
 Community members were invited to send comments and questions to SCRP. SCRP received ten (10) emailed comments, which are on file with SCRP. The one substantive issue raised in these emailed comments was a request by several commenters that the trail on the Stewarts Point property be a multi-use trail. SCRP provided responses to all these comment letters and noted that the easement on the Stewarts Point Ranch property was negotiated between the landowners, Save the Redwoods League, and the County Open Space District. The easement that was granted was for a pedestrian trail only.

A second meeting was planned to provide additional updated information on the Project planning as well as to be a CEQA Scoping Session to gather public input on what issues should be addressed in the Project CEQA study. Due to the Covid pandemic, subsequent meetings were not conducted.

The Community will have future opportunities to provide input into the planning process including;

- Web based posting of the Draft Initial Study on the SCRP North Coast Trails website.
- Public Hearing on the Draft Initial Study in front of the County's Environmental Review Committee
- Input during the 30-day public review period for the Draft Initial Study/Mitigated Negative Declaration
- Input to the Board of Supervisors at a hearing to decide whether to adopt the IS/MND and approve the Project

4.0 Environmental Checklist Data

I. Project Title

North Coast Trails Plan

II. Lead Agency Name and Address

Sonoma County Regional Parks
2300 County Center Drive, Suite 120A
Santa Rosa, CA 95403

III. Contact Person Email and Phone Number

Mark Cleveland
Senior Park Planner
Mark.Cleveland@sonoma-county.org
(707) 565-2041

IV. Project Sponsor's Name and Address

Sonoma County Regional Parks
2300 County Center Drive, Suite 120A
Santa Rosa, CA 95403

5.0 Initial Study Checklist

This section documents the anticipated environmental effects of the proposed Project using an Initial Study Checklist and providing a brief explanation supporting the findings of each checklist item.

Evaluation of Environmental Impacts

This Initial Study is based on CEQA's Environmental Checklist Form. Each item on the checklist is answered as either "potentially significant impact," "less than significant with mitigation incorporated," "less than significant," or "no impact" depending on the anticipated level of impact. The checklist is followed by explanatory comments corresponding to each checklist item.

A "no impact" response indicates that it is clear that the Project will not have any impact. In some cases, the explanation to this response may include reference to an adopted plan or map. A "less than significant impact" response indicates that there will be some impact but that the level of impact is insufficiently substantial to be deemed significant. The text explains the rationale for this conclusion. A "less than significant impact with mitigation incorporated" response indicates that there will be a potentially significant impact, but the Initial Study determines there are adequate mitigations, which are described and have been included in the Project, to reduce the level of impact to an insignificant level. Finally, a "potentially significant impact" response would indicate that the Initial Study cannot identify mitigation measures to adequately reduce the impact to a level that is less than significant. In the latter case, an EIR would be required, but no "potentially significant impacts" have been identified for this proposed Project.

Discussion of Environmental Impacts

The proposed Project will have potentially significant impacts in the areas of air quality, biological resources, cultural resources, geology/soils, hydrology, land use and planning, noise and transportation. All potentially significant impacts identified in this Initial Study can be reduced to a level that is less than significant if mitigation measures recommended in this Initial Study are incorporated into the Project.

I. Aesthetics

This section will evaluate the potential changes to the existing visual characteristics of the Project site and vicinity that could result from the proposed Project. The analysis focuses on changes in visual character and effects on views and scenic resources.

1. Setting

Regional Setting

The proposed Project is located along the coastal bluffs in northwestern Sonoma County, adjacent to State Highway 1. While the southern portion of the county is characterized by low mountains and pastoral valleys, the northwestern region is dominated by rugged terrain. In this area, the Coast Ranges have been folded into a steep and often convoluted series of ridges and river valleys. The Sonoma County General Plan recognizes coastal bluffs as a “landscape of special importance” within the County. It also identifies the Sonoma Coast as a vital scenic resource. The Project site is within a region classified by the County as a Scenic Landscape Unit (Sonoma County General Plan Figures OSRC-1 and OSRC-2).

The primary road in this area is State Highway 1, which runs north-south along the coastline. Skaggs Springs Road, a narrow and winding two-lane County road, connects Highway 1 to Highway 101 just over 40 miles to the east. Highway 1 in the vicinity of the Project sites is designated by Sonoma County as a County Scenic Corridor.

This portion of the county is very lightly developed, with a few small communities, residences, and vineyards. The vast majority of land is undeveloped parkland or privately owned lands. In most areas, zoning restricts parcel subdivision to lots of 240 acres or larger. In the vicinity of the Project area, the primary human-made features include the outpost of Stewarts Point, which consists of a store and post office, located at the intersection of Highway 1 and Skaggs Springs Road. Gualala Point Regional Park and the unincorporated communities of Sea Ranch and Gualala are located to the north; Salt Point State Park, Kruse Rhododendron State Natural Reserve, and Stillwater Cove Regional Park are located to the south.

Project Site Description

The Project site is located between State Highway 1 and the ocean. Existing views from Highway 1 are primarily of coastal terrace grasslands with some stands of trees and rock outcroppings and several intermittent streams. From

State Highway 1 there are many scenic vistas looking west to the Project properties and the ocean beyond.

The Kashia Coastal Reserve site is undeveloped with the exception of one barn adjacent to Highway 1. The southernmost portion of the site supports a Bishop pine overstory with shrubs, ferns, and grasses in the understory. However, the majority of the site is dominated by Coastal Terrace Prairie Grassland. The southern portion of this site is comparatively narrow often providing striking views of the bluff edges and rocky shoreline.

Travelling north on Highway 1, one passes through Salt Point State Park before reaching the Kashia Reserve. Views through the park are of dense Bishop Pine forest on both sides of the road. There are many highway edge turnouts in the park, and it is common to see cars parked at these turnouts, especially on weekends. As one leaves the park, views soon open up as one proceeds north along the Kashia Reserve. Views are of coastal terrace prairie with prominent rock outcropping, intermittent stream channels, and a few stands of trees with the ocean not too distant. Approximately 0.5 mile north of the south end of the Reserve, there is a large section of old highway that serves as a long turnout and an emergency call box. There are additional call boxes to the north including one



Photo 1 - Historic Wooden Bridge

just north of the northern trail terminus. There is a sign about halfway along this old road section a sign identifying the property as the Kashia Coastal Reserve. This is the location of the proposed Kashia Coastal Reserve parking lot and staging area. Views from the parking area location are of open grassland to the west with a blue-water background. The parking area and trailhead have been sited to use existing vegetation along Highway 1 to partly screen the facility from view

Just north of the parking lot is an historic barn near the highway edge. The barn is a one-story wooden structure with some adjacent fenced corrals. The Reserve is quite narrow in

this area with a view of an historic wood bridge spanning an inlet at the bluff edge with prominent white-water views see).

Proceeding north, the bluff edge is located further to the west, allowing the trail to be sited to the west and at a lower elevation than the highway. The portion of the Reserve that would be developed with the trail ends at a rocky knoll approximately 0.6 miles north of the proposed parking lot site. There is a call box just to the north of this trail end.

The Stewarts Point Ranch site is located about 2.5 miles north of the Kashia Coastal Reserve. This property is dominated by views of grassland, with only occasional scattered trees and shrubs—and those mostly located in natural drainage depressions. Rock outcroppings occur in places. This portion of the Project site is wider than the southern Kashia Coastal Reserve parcel, but offers unobstructed views of the ocean, nonetheless. Existing structures on the Stewarts Point Ranch site include a cottage, two barns and an ancillary agricultural shed.

Travelling north from the Stewarts Point Store, one passes the small cottage just north of the store and then views open up to the west. The views to the west and northwest are of a coastal prairie with views of the ocean in the background. Approximately 0.2 miles north of the cottage is an unpaved ranch road leading to a large barn visible to the west. Roadside fencing along this stretch of the highway is old redwood picket fencing to the west. Approximately 0.45 miles from the cottage is the driveway to a private residence located northwest of the Project site. This residence has an easement through the property. North of this driveway to the north end of the site views are open vistas across the coastal prairie. Fencing north of the driveway is wire mesh. The views across the coastal prairie are dissected by riparian vegetation along several drainages with forested hillsides to the east of the highway

Regulatory Setting

Sonoma County General Plan

The Open Space and Resource Conservation Element of the Sonoma County General Plan designates three types of scenic resources within the County that are important to the County's visual character and quality: Community Separators, Scenic Landscape Units, and Scenic Corridors. Community separators are open space or rural buffers located between urban communities that provide distinction between the County's developed communities and prevent urban sprawl. Scenic Landscape Units offer special importance to the County by

contributing to the quality of life of County residents, tourists, and the agricultural economy; providing a scenic backdrop to communities; and providing visual relief from urban. Furthermore, the County designates corridors within the County with views of high visual quality landscapes as Scenic Corridors (Sonoma County 2016, Figure ORSC-1). The segment of State Highway 1 that extends from the northern boundary of Sonoma County until approximately 5 miles east of the City of Bodega Bay has been designated by the County as a Scenic Corridor. This corridor includes the Project site.

The Open Space and Resource Conservation Element of the Sonoma County General Plan provides objectives, policies, and programs regarding aesthetic resources. Several of these policies are pertinent to areas designated as Scenic Landscape Units, Community Separators, and Scenic Corridors. Design review is required within these areas to ensure consistency Project consistency with its surroundings. Relevant General Plan policies are included below:

Goal OSRC-4: Preserve and maintain views of the nighttime skies and visual character of urban, rural and natural areas, while allowing for nighttime lighting levels appropriate to the use and location.

Policy OSRC-4a: Require that all new development projects, County projects, and signage utilize light fixtures that shield the light source so that light is cast downward and that are no more than the minimum height and power necessary to adequately light the proposed use.

Policy OSRC-4b: Prohibit continuous all-night exterior lighting in rural areas, unless it is demonstrated to the decision-making body that such lighting is necessary for security or operational purposes or that it is necessary for agricultural production or processing on a seasonal basis. Where lighting is necessary for the above purposes, minimize glare onto adjacent properties and into the night sky.

Goal OSRC-5: Retain and enhance the unique character of each of the County's unincorporated communities, while accommodating projected growth and housing needs.

Goal OSRC-6: Preserve the unique rural and natural character of Sonoma County for residents, businesses, visitors and future generations.

Policy OSRC-6a: Develop design guidelines for discretionary projects in rural areas, but not including administrative design review for single family homes on existing lots, that protect and reflect the rural character of Sonoma County. Use the following general design principles until these Design Guidelines are

adopted, while assuring that Design Guidelines for agricultural support uses on agricultural lands are consistent with Policy AR-9h of the Agricultural Resources Element.

- (1) New structures blend into the surrounding landscape, rather than stand out.
- (2) Landscaping is included and is designed to blend in with the character of the area.
- (3) Paved areas are minimized and allow for informal parking areas.
- (4) Adequate space is provided for natural site amenities.
- (5) Exterior lighting and signage are minimized.

Local Coastal Plan

The Sonoma County Local Coastal Plan, which was adopted in 1981 and updated in 2001, calls for the protection of visual resources. The County has prepared a Public Review Draft Update of its LCP, but that update has not been finalized nor adopted by the Coastal Commission. Until that occurs, the existing LCP contains applicable policy guidance. The existing LCP includes the following relevant recommendations.

View Protections

- (1) Prevent development (including buildings, structures, fences, paved areas, signs, and landscaping) from obstructing views of the shoreline from coastal roads, vista points, recreation areas, and beaches.
- (2) Prohibit development which will significantly degrade the scenic qualities of major views and vista points
- (3) Except in rural community and urban service areas, require a minimum setback of 100 feet from the right-of-way along scenic corridors and greater where possible. However, permit a 50-foot setback when sufficient screening exists to shield the structure from public view. Where the General Plan policies and standards are more restrictive than the above standards, development shall comply with the General Plan or Coastal Plan policies, whichever are more restrictive, provided that no development shall be approved which does not comply with Coastal Plan policies.

Coastal Terrace Development

- (1) Prohibit development in open fields in rural areas.
- (2) Minimize the number of structures and clustering them near existing natural or man-made vertical features.

- (3) Design structures to be in scale with the rural character of the region.

Community Compatibility

- (1) Design structures to be compatible with existing community characteristics.
- (2) Relate structures in size and scale to adjacent buildings.
- (3) Locate and design all development to minimize the impacts of noise, light, glare, and odors on adjacent properties and the community at large.

Vegetation

- (1) Discourage the removal of significant trees except through legitimate logging operations.
- (2) Locate and design new development to minimize tree removal.
- (3) Prohibit removal of windbreaks unless required because of the disease.
- (4) Prohibit the planting of vegetation west of Highway 1 which could block coastal views.

Coastal Zone Design Guidelines

- (1) Design and site structures to preserve unobstructed broad views of the ocean from Highway 1 and to minimize visual impacts. Cluster structures to the maximum extent feasible.

Recreation

Consistent with the California Coastal Act, the County LCP calls for maximizing coastal access and maximizing public recreational opportunities in the coastal zone consistent with sound resources conservation principles. The LCP Access Plan identifies the properties as priority acquisition and development sites and recommends their acquisition. When providing trail access, the following recommendations are provided:

- (1) Design safe and well-designed trails.
- (2) At trail staging areas, provide restrooms, trash receptacles, signs, and parking lots.
- (3) Avoid environmentally sensitive habitats and resources. Where avoidance is infeasible, design trails to mitigate or offset impacts.

2. Impacts

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

a. *Have a substantial adverse effect on a scenic vista?* **Less than significant impact.**

As noted in the Setting, the Project site is classified as a Scenic Landscape Unit, which includes scenic vistas from State Highway 1. The methodology used to assess the visual and aesthetic impacts of the proposed Project is based on the Visual Assessment Guidelines issued by the Sonoma County Permit Sonoma. This methodology addresses the types and scales of proposed projects normally evaluated in environmental documents prepared for the County pursuant to CEQA. The methodology provides an objective basis for determining the significance of visual and aesthetic impacts under CEQA.

The primary tasks in assessing the Project's visual and aesthetic impacts consist of viewing the site from relevant locations in the vicinity of the Project site, selecting representative viewpoints for consideration in the Initial Study, describing the site from those locations, determining the sensitivity level of the site, assessing the Project's visual dominance within its setting, and determining the significance of impact.

Equipment and materials used in constructing the trail and associated amenities would be quite visible for drivers on Highway 1 as they passed the active construction zone. However, these would be short-term impacts that would end once the construction phase is completed. Such short-term construction impacts would not constitute a substantial impact or change to the coastal viewshed.

The Project would add two parking areas, one restroom, three picnic tables, several benches, bicycle racks, signing, wire and grape stake fencing. These features would be visible from certain vantage points along the highway. The compacted natural surface trail would rarely be noticeable from the highway due to the elevation differences between the highway and the trail, intervening topographic differences, and rock outcrops, trees and shrubs. The trail, once completed, would blend with the surrounding vegetation. Most wetland and stream crossings would be constructed at ground level to cross the wetlands. Some surface crossings would use puncheons that would be constructed of wood or stone materials that over time would blend with surrounding vegetation. The principal visual changes would be views of the Stewarts Point Ranch parking lot and the Kashia Coastal Reserve parking lot with adjacent picnic tables, benches, and a restroom. The following discussion summarizes possible changes to views.

Starting at the south end of the Kashia Coastal Reserve, the southern trail intersection with Highway 1 would be visible as one passes the site. There is no proposed parking at this entry, so there would be no views of parked cars, and there would be minimal signing as this terminus is not a trailhead (it is expected that in the future the trail will be extended south to connect to trails on Salt Point State Park). This trail intersection would need to be developed in coordination with Caltrans. Caltrans may condition the easement onto their right-of-way to not include signage and/or roadside parking. To the north, a new bridge would be installed near the bluff edge to replace a deteriorating historic bridge. This new bridge would likely not be visible from the highway due to the elevation difference and roadside screening.

Further north the Kashia parking area with associated amenities would be visible. The parking lot would parallel the highway with a one-way entry at the north end and one-way exit at the south end. Cars would be parked in three parking bays plus an ADA parking space next to the restroom. The restroom would be located immediately south of the parking area. This area would include the restroom, an ADA parking space, three picnic tables, two benches and trail signing. Preliminary design plans indicate that trees and shrubs would be planted around these facilities. Large rocks would be placed between the parking area and the highway to confine vehicles to the lot and the designed entrance and exit. The final design for this parking area including, where warranted, new plantings to provide screening has not been completed at this stage. It is assumed, as recommended by the LCP, that these improvements will be screened as far as feasible from highway vantage points. Even if not fully screened, views would be of up to nine cars parked in an area near the highway edge. A view of a few cars parked along or near the highway edge is common along Highway 1 as it passes through State and County parks to the south. Drivers travelling north would have views of these improvements for about 500 feet (about 6 seconds at 55 mph).



Photo 2

View Looking South from the Kashia Parking Lot Area



Photo 3

View Looking North from the Kashia Parking Lot Area

One vantage point where the trail could be noticeable is just north of the historic barn where the trail would travel into the highway right-of-way in order to avoid the deteriorating historic bridge and unstable bluff edge on the Project site. Here, a driver traveling on the highway might see an occasional trail user on the trail. The historic bridge would remain visible to the west. North of this vantage point the trail; would be located to the west. As it approached the northern terminus, it would be at a lower elevation than the highway and not visible from most vantage points on the highway. The northern terminus of the trail will intersect the highway just south of a large rock outcropping. The trail would switchback up from the lower terrace and be visible only at the intersection with the highway. Again, this intersection design would be coordinated with Caltrans and likely would be signed to prohibit parking near the trail intersection.

For the Stewarts Point Ranch trail, starting at the Stewarts Point Store at the intersection of Highway 1 and Skaggs Springs Road, the southern trail terminus is adjacent to a small cottage. The trail intersection with the

highway would have, at most, a sign here, but there would be no parking at this entrance. Travelling north the trail would be located nearer the ocean bluff distant from the highway. The parking lot and up to nine cars parked in that lot will first become visible approximately 750 feet south of the lot. As the driver gets nearer, the parking lot amenities, including parked cars, two benches and signage, would become increasingly evident until one passes the lot. The lot will be located immediately south of the private driveway to the private residence that is located north of the Project site (see photo below). It will be located about 20-50 feet from the highway. Access will be off the driveway to the private residence. Existing picket fencing where this driveway intersects the highway will provide some screening of the lot and parked cars, especially from the north.



Photo 4
View from Access to Private Driveway
Location of Stewart Point Staging area

Travelling from the north, the parking area will first become visible where the highway bends east and descends the highway grade just south of the small sheep shed near on the Project site. The Stewarts Point staging



Photo 5
View Travelling from the North

area and up to nine cars parked in that lot will be visible for about 700 feet until the traveler passes south of the lot. The Project trail extension proposed for the second phase of development is distant from the highway except where it intersects the highway near the old shearing shed and would not be very noticeable from the highway. When this second phase is constructed, its intersection design would also be coordinated with Caltrans regarding parking and signage.

As described previously, the compacted natural surface trail would rarely be noticeable from the highway due to the elevation differences between the highway and the trail, intervening topographic differences, and trees and shrubs. The trail, once completed, would tend to blend with the surrounding vegetation. Most wetland and stream crossings would all be constructed to be at ground level to cross the wetlands. The crossings on the Stewarts Point Ranch are mainly located near the west side of the

property, typically 800-900 feet from the edge of the highway. They likely would not be visible from the highway. The one bridge that would be installed would include railings and supports that would extend above the ground level. However, this bridge is at least 600 feet west of the highway. Some fencing to control cattle will be installed on this site. The fencing would be 4- to 5-strand wire as shown in Figure 6. The fencing would not be particularly visible from most vantage points due to the distance of the trail from the highway. In addition, various forms of fencing already exist on the site, so it would not be adding a new visual feature to the site.

To summarize, 1) the trail itself would not be a substantial visual intrusion into the viewshed; 2) there would be few visible proposed improvements spread along two miles of State Highway 1 frontage; and 3) most trail improvements would not be visible due to intervening vegetation, horizontal and vertical curves in the highway, and/or the distance from the highway. The two elements that would have some impact on views are the parking lots/staging areas. The Stewarts Point Ranch lot would be noticeable for about 750 feet from either the south or north until one passed the lot. Vehicles, when present in the lot, would be visible, but it is projected that at the most 5-9 vehicles would be parked there at any one time, and much of the time there would likely be fewer. Similarly, the parking lot, parked cars, the restroom, and picnic facilities at Kashia Coast Reserve would be limited to views from about 500 feet from the north and the south.

The visual impact of the few visible improvements on the 2-mile section of Highway 1 viewshed would be minimal. In accordance with the County's Visual Assessment Guidelines, the determination of the significance of visual impacts was made by correlating visual sensitivity with visual dominance. Based on the County's Visual Assessment Guidelines, the project would have a significant visual impact if the visual dominance of the proposed project exceeds that which is considered acceptable for the sensitivity level of the project site.

Based on the field review and the characterizations of view toward the Project site described above, the visual sensitivity level of the Project site (either low, moderate, high, or maximum as described in the County's Visual Assessment Guidelines) would be considered "maximum." Maximum sensitivity is the appropriate level of sensitivity when: *The site or any portion thereof is within a land use or zoning designation*

protecting scenic resources, such as General Plan designated scenic landscape units, coastal zone, community separators, or scenic corridors

Once site sensitivity has been established, the visual dominance of the project characteristics is assessed to determine if the project elements are dominant, co-dominant, subordinate, or inevident. If a project is generally not visible from public view, then the visual dominance is considered “inevident.” As described above, Project elements are generally not visible from the two miles of Highway 1 stretching alongside the Project site. The few improvements that would be visible are either shielded or only visible for a brief time as one passes those improvements. These improvements are typical of other parks along the Sonoma Coast, where there are views of scattered parking areas, restrooms, and trails, while most of the views are of native vegetation and the ocean.

The overall Project is deemed as having “Inevident” Visual Dominance per the County’s Visual Assessment Guidelines because as described above, almost all proposed improvements would be screened by intervening vegetation, topography, and distance from the highway.

The improvements will identify the Project site as public land or land allowing public access rather than private land that can only be looked at as passing by on Highway 1. These identifying signs and other amenities will likely be a pleasant visual addition to the landscape for many passersby. While certain Project elements will be noticed by drivers along Highway 1, these changes do not reach the impact level of being a “substantial adverse” effect.

This finding of less-than-significant impact is consistent with the findings for other coastal trail projects in the area. The Local Coastal Plan calls for construction of a coastal trail the length of the County. In adopting that plan, the County found that construction of such a trail and facilities needed to access the trail would not have significant visual impacts so long as the facilities were sited and constructed to minimize their visibility. The Project implements and is consistent with the County LCP. It is noted that, the Initial Study/Mitigated Negative Deceleration adopted in 2016 by the County for the parking lot, restroom, and trail improvements proposed for the Jenner Highlands Integrated Resource Management Plan found that the proposed much larger parking lot, restroom facilities, and other improvements at that site would not have a significant aesthetic impact.

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

Though Highway 1 in the Project area is eligible for official designation as a California State Scenic Highway, it has not been so designated. As such, the Project would not damage scenic resources visible from a state scenic highway. Accordingly, the Project would have no impact on scenic resources as defined by this criterion. In addition, as discussed under the previous checklist item, the Project would not significantly impact scenic vistas, including scenic resources on the site. There would be no removal of rock outcroppings or historical buildings. A few small Bishop pine trees will be removed at the south end of the Kashia property in order to construct the trail. These trees are common in this area, and these small trees are not considered a "scenic resource." An objective of the Project is to preserve scenic resources on the site.

- 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 in the discussion of Checklist Item 1(a), the Project would not have a significant impact on scenic vistas or the visual character of the Project site. A primary objective of the Project is to provide public access consistent with County and State plans for the California Coastal Trail while maintaining the integrity of scenic resources of the properties.

- d. *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?* **No impact.**

The Project would not include any lighting. Neither the few proposed new structures nor the proposed trail, would have reflective surfaces and therefore would not create glare. Therefore, there would be no impact from new lighting or sources of glare.

II. Agriculture and Forestry Resources

1. *Setting*

The Stewarts Point Ranch site is currently used for livestock grazing. The Kashia Reserve is undeveloped, and historically has been used for livestock grazing. Though the Kashia Reserve has a small wooded area, it primarily consists of Bishop and Monterey pine, neither site supports “forest land.”

2. *Impacts*

- 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? **No impact.***

The proposed Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the 2014 Map of Sonoma County Farmland. Therefore, there would be no impact on these resources.

- b. *Conflict with existing zoning for agricultural use, or a Williamson Act contract? **No impact.***

The Stewarts Point Ranch is zoned Land Extensive Agriculture. The property is currently grazed and will continue to be grazed after the trail and parking area are installed. The trail will be located on an easement across the property to allow both recreational use and commercial grazing of the property. Therefore, the Project will not conflict with the existing zoning for agricultural use.

The Kashia Coastal Reserve is zoned Coastal Zone Resources and Rural Development (RRD CC), and the reserve is under a Williamson Act contract. The RRD CC zoning permits recreational use as an allowed use. Therefore, the Project would not conflict with this zoning classification. The site is not currently grazed, and the Project would not prohibit extension of the Williamson Act contract or restrict uses to agricultural or related open space use. The proposed Project would be considered a related open space use for the Project site. Therefore, the Project would not conflict with existing zoning of this reserve nor the restrictions of the Williamson Act contract.

- c. *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?* **No impact.**

The site is not zoned as forest land or timberland. Accordingly, the Project would not conflict with forest land or timberland zoning.

- d. *Result in the loss of forest land or conversion of forest land to non-forest use?* **No impact.**

The site does not contain forest land, nor would it result in conversion of such land to other uses.

- 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?* **Less than significant impact.**

The Project would not create conditions that would affect other grazing lands to the north of either property. Visitors will be restricted to the parking areas and trail system on the reserves. Trespass off the trails will be forbidden. Dogs will not be allowed on the Stewarts Point property. There is no evidence that such use would adversely affect other grazing operations in the area. Therefore, the impact would be less than significant.

III. Air Quality

1. Setting

Environmental Setting

Air quality is a function of the rate and location of pollutant emissions under the influence of meteorological conditions and topographic features that influence pollutant movement and dispersal. Atmospheric conditions such as wind speed, wind direction, atmospheric stability, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants, and consequently affect air quality.

Climate has a strong influence on both natural resources and recreational opportunities on the Project site. Sonoma County has a Mediterranean climate with moderate temperatures, wet winters and typically dry summers. The climate along the coast is heavily influenced by the Pacific Ocean that brings summertime fog, low clouds, winter storms, and seasonally variable winds. Summer temperatures are mild (average 64° F), with frequent low clouds and fog that provide important moisture to vegetation during the dry season. Prevailing summer winds are from the northwest, averaging 10 to 15 miles per hour, with gusts as high as 50 to 60 miles per hour. Winter storms often batter the coastline with strong, moisture-laden, southerly winds. These winter storms, from November through April, account for nearly all the average annual rainfall that varies between 30 and 38 inches. Winter temperatures are moderate, with averages ranging from highs in the 50s to lows in the 40s.

Sensitive Receptors

Sensitive receptors are defined as facilities where sensitive population groups are located, including residences, schools, childcare centers, convalescent homes, and medical facilities.

Regulatory Setting

The Project site is located within the North Coast Air Basin. Air quality in this air basin is governed by the Northern Sonoma County Air Pollution Control District (NSCAPCD). The NSCAPCD is responsible for implementing emissions standards and other requirements of federal and state laws. The air basin is in compliance with all ambient State and federal air quality standards except for the 24-hour particulate (PM10) standard, which is only violated in Humboldt County which is under the regulation of the North Coast Unified Air Quality Management District.

Accordingly, the NSCAPCD is not required to adopt nor implement an air quality plan.

2. Impacts

- a. *Conflict with or obstruct implementation of the applicable air quality plan? **No impact.***

The NSCAPCD does not have an air quality plan. The Project would generate a small amount of criteria air pollutants during construction. Once opened, vehicles being driven to the site would emit pollutants. The quantity of pollutants generated by the projected 11 trips per day on a weekday and 18 trips per day on a weekend day (i.e., about the number of trips generated by an average single-family residence) would not be expected to cause air quality conditions in the air basin to exceed State or federal thresholds. Accordingly, there would be no impact on the NSCAPCD maintaining its compliance standards with State and federal standards.

- 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? **Less than significant with mitigation incorporated***

The Northern Sonoma County portion of at regional air basin is in attainment with all applicable federal and State ambient air quality standards. To ensure that the Project emissions do not make a cumulatively impact relative to attainment issues, standard dust control mitigation measures will be required.

Mitigation Measure AQ-1: The Project Contractor and SCRCP shall construct and conduct needed maintenance activities on the Project site to control dust from leaving the site. Specific control measures include the following:

1. The Contractor will be required to spray water or dust palliative on unpaved construction, staging areas, and to stockpiles of soil as needed to control dust during construction. SCRCP staff will be required to spray water or dust palliative on unpaved areas as needed during maintenance activities.
2. The Contractor will be required to cover loads of soil, sand, and other loose materials over public roads, keep the loads at least two feet below

the level of the sides of the hauling container, and wet the load sufficiently to prevent dust emissions during construction of the proposed Project. SCRCP staff will be required to cover loads of soil, sand, and other loose materials over public roads, keep the loads at least two feet below the level of the sides of the hauling container, and wet the load efficiently to prevent dust emissions as needed during maintenance activities.

3. The Contractor will be required to sweep paved roads as needed to remove soil that has been carried onto them from the Project site during construction. SCRCP staff will be required to sweep paved roads as needed to remove soil that has been carried onto them from the Project site due to maintenance activities
4. The Contractor will be required to operate all construction vehicles and equipment with emission levels that meet current air quality standards and to minimize idling time for all heavy equipment to reduce on-site emissions during construction. SCRCP staff will be required to operate all construction vehicles and equipment with emission levels that meet current air quality standards and to minimize idling time for all heavy equipment to reduce on-site emissions during maintenance activities.

Mitigation Monitoring and Reporting

The applicant will include these measures in the construction contract. The Contractor will be responsible for implementing the construction-related measures. SCRCP shall monitor construction to ensure implementation. SCRCP shall implement and oversee maintenance projects that would potentially generate dust.

Impact Significance After Mitigation

These standard mitigation measures would reduce the construction emissions to a less-than-significant level. In addition, as described in the previously discussion, the Project would generate an insignificant quantity of emissions of air pollutants.

- c. *Expose sensitive receptors to substantial pollutant concentrations?* **Less than significant impact**

The one residence that is near the proposed trail is located adjacent to the southern end of the trail on the Stewarts Point Ranch. Otherwise, there are few residences within 1,000 feet of the proposed Project. The

residence to the north of the Stewarts Point Ranch is appreciably 350 feet from the nearest trail section and over 1,000 feet from the proposed parking area. Two residences east of Highway 1 are approximately 850 feet and 350 feet, respectively, from the nearest trail segment and over 2,000 feet from the proposed parking area. One residence to the south of this reserve is within 450 feet of the nearest trail segment. There is one residence east of Highway 1 that is within approximately 350 feet of the nearest trail segment on the Kashia Coastal Reserve.

As described previously, the quantity of pollutants emitted during construction would be small and occur for a very short time. The distance between most of the trail construction and these residences would allow dispersal of emissions, particularly given frequent winds in the area. These short-term emissions would not constitute a substantial pollutant concentration at these residences. Future use of the trails would attract additional trips on Highway 1, but the increase over ambient traffic using that highway would be minimal. The small increase would not be expected to result in substantial pollutant concentrations at these residences. Therefore, the impact to sensitive receptors would be less than significant.

- d. *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?* **No impact.**

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. New operations associated with the proposed Project would be limited to a small number of new trips. Thus, the proposed Project operation is not expected to create objectionable odors, and the odor impact associated with the proposed Project would be less than significant.

IV. Biological Resources

1. Setting

The following assessment of biological conditions and impacts is based on the *Biological Resources Assessment - North Coast Trail* (Wildlife Research Associates and Jane Valerius Environmental Consulting, August 23, 2018) prepared for the Project; it is contained in Appendix B. Additional information was taken from *Delineation of Wetlands Waters of the U.S. and State Including California Coastal Commissions Wetlands for the Kashia Coastal Reserve Trail Project Sonoma County, CA* (Jane Valerius Environmental Consulting, August 13, 2018) contained in Appendix C. The following summarizes much of the data on the environmental setting. The reader is referred to the full appended report for additional details on habitat types.

The Project area is located within the ecological North Coast Province. This province is located along the Pacific coast from the California-Oregon border to the San Francisco Bay watershed in the south. The North Coast Province vegetation consists predominantly of conifer and mixed-conifer forests dissected by chaparral stands, riparian forests, and wetlands. Valley and foothill grassland and woodland communities emerge along the central and southeastern border of the province, while coastal wetlands and marshes appear along the coastline. Locally, the Sonoma County Local Coastal Program identifies this portion of Sonoma County as being within the Stewarts Point-Horseshoe Cove Environmental Resource Area.

The proposed Kashia and Stewarts Point trails would be located between an elevation of 140 feet on the east, along Highway 1, and 50 feet in the west, along the bluffs of the Pacific Ocean. Surrounding land uses consist of open space lands used as ranches and rural residences located along Highway 1.

The Kashia trail area supports two unnamed creeks that flow from east to west across the property, both of which are identified as intermittent blue line creeks on the USGS topographic map. In addition, eight (8) unmarked drainages and multiple wetlands and seeps occur on the parcel. This parcel is not currently being grazed and was not grazed in 2018 when the Biological Assessment was prepared.

The Stewarts Point Ranch trail area supports two unnamed creeks that flow from east to west across the parcel, both of which are identified as intermittent blue line streams on the USGS topographic map. In addition, six (6) unmarked drainages and multiple wetlands and seeps occur on the parcel. The Stewarts

Point Ranch parcel is typically grazed with sheep, cattle and goats and an active ranching operation.

Vegetation Communities

The Project area contains five main vegetation communities. These communities are further subdivided into twelve different vegetation alliances. The twelve vegetation types are briefly described below. See Table 1 and Appendix B for a full description of these communities, alliances, and species found or expected in these communities on the Project site. Five of the communities are grassland types, three are wetland types, one is a conifer forest type, one is a coastal scrub type, and two coastal riparian scrub types.

Table 1: Vegetation Communities Present– North Coastal Trails Plan

Vegetation Community	Vegetation Alliance
Kashia Coastal Reserve	
Grassland/ coastal terrace prairie	Common velvet grass -sweet vernal grass meadows (<i>Holcus lanatus</i> – <i>Anthoxanthum odoratum</i> , <i>A. aristatum</i> Semi-Natural Alliance)
	Pacific reed grass meadows (<i>Calamagrostis nutkaensis</i> Herbaceous Alliance)
	Tall fescue grassland (<i>Festuca arundinacea</i> Semi-Natural Alliance)
Seasonal wetlands	Soft and western rush marshes [<i>Juncus (effusus, patens)</i> Provisional Alliance]; slough sedge swards [<i>Carex obnupta</i> Herbaceous Alliance]
North Coast coniferous forest/closed-cone pine forest	Bishop pine forest (<i>Pinus muricata</i> Forest Alliance)
Coastal scrub	Coyote brush scrub (<i>Baccharis pilularis</i> Shrubland Alliance)
Coastal riparian scrub	Red alder forest (<i>Alnus rubra</i> Forest Alliance)
Stewart’s Point Trail	
Grassland/ coastal terrace prairie	Common velvet grass -sweet vernal grass meadows (<i>Holcus lanatus</i> – <i>Anthoxanthum odoratum</i> , <i>A. aristatum</i> Semi-Natural Alliance)
	Annual dogtail grasslands [<i>Cynosurus echinatus</i> Semi-Natural Alliance; <i>Cynosurus echinatus</i> – (<i>Danthonia Pilosa</i> [<i>Rytidosperma penicillatum</i>] – <i>Stipa manicata</i>) Provisional Semi-Natural Association]
	Tufted hair grass meadows (<i>Deschampsia cespitosa</i> Alliance)
Seasonal wetlands	Soft and western rush marshes [<i>Juncus (effusus, patens)</i> Provisional Alliance]
Coastal riparian scrub	Wax myrtle scrub (<i>Morella californica</i> - <i>Rubus spectabilis</i> Alliance)

Of the twelve vegetation types described below, five are grassland types, three are wetland types, one is a conifer forest type, one is a coastal scrub type and there are two coastal riparian scrub types.

The grasslands within the Stewarts Point Ranch had been grazed at the time of the plant surveys in both 2016 and 2018. No grazing occurs within the Kashia Coastal Reserve, and the grassland areas there have a dense cover of grasses and forbs throughout most of the Project area.

Within the two study areas the grasslands are mostly dominated by non-native species. However, in the Kashia Coastal Reserve there is an area dominated by Pacific reed grass (*Calamagrostis nutkaensis*), which is a native species, and within the Stewarts Point Ranch trail there are large areas dominated by native tufted hair grass (*Deschampsia caespitosa* ssp. *holciformis*). In addition, native California oat grass (*Danthonia californica*) occurs in patches in the Stewarts Point Ranch but does not constitute a separate plant community. These grasses are also associated with the coastal terrace prairie grassland type, which is a special status vegetation type.

The coastal terrace prairie grassland type is defined as dense, tall grassland dominated by both sod and tussock-forming perennial grasses with most stands being patchy and variable in composition. This reflects local differences in soil moisture, hydrology and drainage. The coastal terrace prairie also includes the non-native species tall fescue (*Festuca arundinacea*) and velvet grass (*Holcus lanatus*), both of which occur in varying densities within the Project area.

The trail will primarily be located within grassland/coastal terrace prairie plant community, with some portions of the trail within North Coast coniferous forest and Coastal riparian scrub communities, with small areas of seasonal wetlands. The trail will not be located within other plant communities found in the Project area.

Coastal Terrace Prairie Grassland Community

Common velvet grass-sweet vernal grass meadows Alliance: The northern portion of the Kashia Coastal Reserve, and much of the grassland in the Stewarts Point Ranch Trail, is comprised of this non-native grassland vegetation type. Within this community type, velvet grass is co-dominant with sweet vernal grass and includes other non-native grasses. Native grasses and forbs also occur within this grassland type and include California oat grass, Douglas iris (*Iris douglasiana*), yarrow (*Achillea millefolium*), dwarf brodiaea (*Brodiaea terrestris*), hairy star tulip (*Calochortus tolmei*), Wight's paintbrush (*Castilleja wightii*), sea pink (*Armeria maritima*), brownie thistle (*Cirsium quercetorum*), bracken fern (*Pteridium aquilinum*), California blackberry (*Rubus ursinus*), seaside daisy (*Erigeron glaucus*), and common coastal morning-glory (*Calystegia purpurata* ssp. *purpurata*). Two special status plants that occur in this type include coastal bluff morning-glory (*Calystegia purpurata* ssp. *saxicola*) and Harlequin lotus (*Hosackia gracilis*).

Pacific reed grass meadows Alliance: This native coastal terrace prairie grassland type occurs only within the Kashia Coastal Reserve at the southern end of the

trail and also occurs as an understory grassland type for the North Coast coniferous forest type, or Bishop pine forest Pacific reed grass is also a facultative wetland (FACW) plant species and the area where this grass is dominant qualifies as a California Coastal Commission (CCC) wetland area since there is a dominance of a wetland species. Although the grassland is a mesic type, there was no evidence of wetland soils or wetland hydrology, so this area does not qualify as a U.S Army Corps of Engineers (USACE) wetland.

Tall fescue grassland Alliance: This is a non-native grassland type and occurs only in the Kashia Coastal Reserve. Tall fescue forms very dense stands in the middle portion of the proposed trail system. This type also includes other non-native species similar to those listed previously as well as various native plant species.

Annual dogtail grassland Alliance: This nonnative grassland type is found only within the Stewarts Point Ranch. This type is dominated by dogtail grass with purple awned wallaby grass (*Rytidosperma penicillatum*) and Andean tussock grass (*Stipa manicata*).

Tufted Hair Grass Herbaceous Alliance: This vegetation occurs primarily within the Stewarts Point Ranch. This native coastal terrace grassland type occurs in areas that are slightly wetter and typically near wetlands and sometimes extending into them. Where this species is dominant it forms larger areas of tufted grasses. Other non-native and native species such as those listed for other types are also present here.

Seasonal Wetlands

*Soft and Western Rush Marshes [*Juncus (effusus, patens) Provisional Alliance :**

This vegetation type occurs within both the Kashia Coastal Reserve and the Stewarts Point Ranch. Within the Kashia Coastal Reserve, it occurs at data points 4, 7, 9 and 17 (see Appendix C). Within the Stewarts Point Ranch, it occurs in all the areas identified as USACE jurisdiction wetlands. Wetland plants associated with this type include several species of rush including soft rush (*Juncus effusus*), spreading rush (*Juncus patens*), iris-leaved rush (*Juncus phaeocephalus*), wire rush (*Juncus balticus*) and toad rush (*Juncus bufonius*).

*Slough sedge swards (*Carex obnupta*) Herbaceous Alliance):* This wetland type occurs in one area in the northern portion of the Kashia Coastal Reserve. Other wetland plants noted include spreading rush and velvet grass.

California Coastal Commission (CCC) one-parameter wetlands: Three areas were delineated as CCC only wetlands. These areas typically had a dominance of

wetland plants such as Pacific reed grass, velvet grass and/or soft rush, but generally lacked wetland soils and, sometimes, wetland hydrology.

North Coast Coniferous Forest/Closed-Cone Pine Forest

Bishop pine forest: This vegetation type is mainly in the southern portion of the Kashia Coastal Reserve and is common along Highway 1 within the Project study area. The dominant tree species is the native Bishop pine and it also includes some Douglas fir (*Pseudotsuga menziesii*), and non-native Monterey pine (*Pinus radiata*). There are a variety of understory shrubs and grasses.

Coastal Scrub

Coyote brush scrub (Baccharis pilularis Shrubland Alliance): This vegetation type is mapped for the Kashia Coastal Reserve and occurs between the highway shoulder and the slope leading down to the property.

Coastal Riparian Scrub

Red alder forest (Alnus rubra Forest Alliance): This vegetation type is mapped for the Kashia Coastal Reserve at drainage D-5 which is marked as mile marker 45.17 along the Highway 1.

Special Status Biological Resources

Within the Project Area, several vegetation communities, as well as individual plant and animal species are designated as having special status based on their overall rarity, endangerment, restricted distribution, and/or unique habitat requirements. One of the special status vegetation communities, *Coastal Terrace Prairie*, occurs within both the Kashia and Stewarts Point properties. Two coastal scrub riparian communities, red alder forest alliance and wax myrtle scrub, and two seasonal wetland types, slough sedge swards and soft rush marshes, and one grassland type, Pacific reed grass meadows, are all identified as special status plant communities based on the CDFW (2010) natural communities list. In addition, any wetland areas that are not identified as CDFW special status vegetation communities are considered as sensitive natural communities because of their habitat values, and they fall under the jurisdiction of the USACE, RWQCB and CDFW. They also meet the definition of environmentally sensitive habitats as defined by the CCC and the Sonoma Local Coastal Plan (see below). Riparian corridors are also identified in the Sonoma County General Plan as special areas to be protected by use of setbacks and other restrictions.

The Bishop pine forest alliance is also a CDFW special status vegetation community type. This is a native species and is common within and adjacent to the Project area. Locally the pine trees are considered to be invasive taking over native coastal terrace prairie grassland communities. South of the site, at Salt Point State Park the Bishop pine trees are being removed to reduce fire hazard and to open up areas for native coastal terrace prairie grassland. No compensatory mitigation is recommended for individual trees of this type. Some of the smaller pine trees may be removed to provide restoration areas of coastal terrace prairie grassland habitat. Opening up more area for coastal prairie grassland would also benefit the endangered butterflies and the California red-legged frog.

California Coastal Commission: Environmentally Sensitive Habitat Areas (ESHAs)

ESHAs are delineated by the presence of sensitive species and habitats. The California Coastal Act (Public Resources Code Section 30107.5) provides special protections for areas designated as ESHAs, defined as follows: "Environmentally sensitive area" means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments. The County's LCP provides for protection of wetlands, coastal prairies, coastal bluffs, and riparian zones. Given these definitions, areas of coastal terrace grasslands, coastal brush or scrub, wetlands, and riparian areas are all considered to be environmentally sensitive areas.

Special Status Plant Species

A total of 33 special status plant species have been reported occurring on the three topographic quadrangles in the greater Project area (CNDDDB 2018). See Appendix B for a full list of reported species and for the list of species assessed in this Initial Study.

Four (4) special status plants were observed during the appropriately timed surveys. These are coastal bluff morning-glory (*Calystegia purpurata* ssp. *saxicola*), harlequin lotus (*Hosackia gracilis*), purple-stemmed checkerbloom (*Sidalcea malviflora* ssp. *purpurata*), and fringed corn lily (*Veratrum fimbriatum*). See Appendix B for a description of the general ecology of each of these species and the locations for these species within the Project study area. The following describes the results of the surveys done for special status plant species.

Coastal bluff morning-glory (*Calystegia purpurata* ssp. *saxicola*) Status: CNPS Rank 1. This species occurs in coastal bluff scrub, coastal dunes, coastal scrub

and North Coast coniferous forest habitats. This species was found in multiple locations within the Project study areas.

Harlequin lotus (*Hosackia gracilis*) *Status: CNPS Rank 4:* This species occurs in a variety of habitats including coastal bluff scrub, coastal prairie, coastal scrub, meadows and seeps, North Coast coniferous forest and valley and foothill grassland. It often occurs in wetlands and along roadsides. This plant species was abundant within the two study areas. On the Stewarts Point Ranch the numbers were in the thousands. It was generally found in wetland areas, including many locations within the proposed trail corridor. Although it is on the CNPS Watch List, it is relatively common on the northern California coast and was particularly abundant in the Stewarts Point Ranch study area.

Purple-stemmed checkerbloom (*Sidalcea malviflora* ssp. *purpurata*) *Status: CNPS Rank 1B*” This low-growing, perennial herbaceous species is considered to be fairly endangered in California. This species occurs in broadleaf upland forests and coastal prairie. This species has been recorded near Fort Ross, at Gerstle Cove in Salt Point State Park, and near Stewarts Point. It was found on the Kashia Coastal Reserve in 2018. This plant was not observed in the Stewarts Point Ranch. This species was not abundant nor common on the site.

Fringed corn lily (*Veratrum fimbriatum*) *Status: CNPS Rank 4:* Fringed corn lily typically occurs in wet meadows in coastal scrub. Dozens of individuals were observed on the Stewarts Point Ranch. No individuals of this species were observed in the Kashia Coastal Reserve.

One other special-status species, salt sedge (*Carex saliniformis*, CNPS Rank 1B), has moderate potential to occur in the study area. During a 2016 field survey, one sedge species which was lacking reproductive parts for identification (due to timing and/or herbivory) was present in the large wetland south of Drainage D in the Stewarts Point Ranch, so the presence of *Carex saliniformis* could not be ruled out. This species typically occurs in mesic coastal prairie, scrub, meadows, seeps, and salt marshes. Dozens of plants were present, and they were not in an area of proposed impact. Further study would be needed to confirm its identity, but this plant is not located near proposed trail areas.

As detailed in Appendix B, four other species have recorded occurrences close to the Project study area but were not observed during the site visits and are therefore considered not likely to occur in the study area:

Waters of the U.S. and State

Wetland delineations were prepared in 2016 for the Stewarts Point Ranch and in 2018 for the Kashia Coastal Reserve. See Appendix C for details on the surveys and delineation process. See the impact analysis section below for a description of what wetlands would be affected by the Project,

Special Status Animal Species

"Special Status Species" is a universal term used in the scientific community for species that are considered sufficiently rare that they require special consideration and/or protection and should be, or have been, listed as rare, threatened or endangered by the Federal and/or State governments. The following definitions apply:

1. **Endangered** (Federal & State) - any species that is in danger of extinction throughout all or a significant portion of its range. (Except insect pests - Feds).
2. **Threatened** (Federal & State) - any species likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.
3. **Rare (State)** - this is technically used only for plants, as defined under the California Native Plant Protection Act. When the California Endangered Species Act (CESA) was enacted, all animals with a rare classification were reclassified as threatened; however, rare plants were not.
4. **Species of Concern (Federal)** - species for which existing information indicates it may warrant listing as threatened or endangered but for which substantial information for listing is still lacking.
5. **Species of Special Concern (State)** - special plant/animal species tracked by California Natural Diversity Data Base regardless of their legal or protection status.

As described in Appendix B, 36 Special Status wildlife species were evaluated to determine their potential presence on or use of the Project site. The Appendix also provides details on the general ecology of each species. The following species were observed or have the potential to occur on the site.

Western Bumble bee (*Bombus occidentalis*) Status: CNDDDB watch list: The habitat for this species is described as open grassy areas, urban parks and gardens, chaparral and shrub areas, and mountain meadows. No species-specific surveys were conducted for this habitat assessment. It is a possible

inhabitant of the Project site. Measures to protect wetlands and native plants on the site will protect the bees. The Biological Assessment report (Appendix B) did not recommend further mitigation for this species.

Lotus blue butterfly (*Lycaeides argyrognomon lotis*) *Status:* USFWS Listed Endangered: Habitat occupied by this species includes wet meadows and sphagnum bogs. It is thought that the harlequin lotus (*Hosackia gracilis* (*Lotus formosissimus*)) is the larval food plant for this species. The larval plant was found on the both the Kashia Coastal Reserve and the Stewarts Point Ranch. However, the species has not been observed since 1983, despite extensive surveys in historical and potential sites in 1991, 2003-2004.

Behren's silverspot butterfly (*Speyeria zerene behrensii*) *Status:* USFWS Listed Endangered with a Recovery Plan adopted in 2003 and a Final Implemented in 2015: Occurrences and known habitats are coastal terrace prairie habitat west of the Coast Range in southern Mendocino and northern Sonoma Counties. Populations of this species have been reported north and south of the Kashia Coastal Reserve and the Stewarts Point Ranch, with one reported location just south of the Stewarts Point Ranch.

California Red-legged Frog (*Rana draytonii*) *Status:* USFWS listed Threatened with Critical Habitat, CDFW Species of Special Concern: Review of occurrences within a one-mile radius reveals no populations have been reported; however, that may mean that not all private lands have been surveyed for this species. This species has not been reported within three miles of either trail. However, individuals in unreported areas may be moving about the landscape during construction. It is possible this frog inhabits or uses the Project site.

Burrowing owl (*Athene cunicularia*) *Status:* USFWS Bird of Conservation Concern and CDFW Species of Special Concern: Foraging and breeding habitat for burrowing owl includes native and non-native grasslands, deserts, and agricultural areas. Although no evidence of occupancy was observed during the site visits, there is potential for burrowing owls to use the Project area for wintering habitat. The closest reported sighting is more than 3 miles south.

American badger (*Taxidea taxus*) *Status:* CDFW Species of Special Concern: A medium-sized carnivore, badgers rely primarily on small burrowing mammals, such as California ground squirrel and Botta's pocket gopher, as a prey source, and badger populations vary with prey availability. This species

has been observed and reported on both trail parcels. See the appended biology report for maps showing burrow locations on the site.

Roosting bats – including Townsend’s big-eared bat (*Corynorhinus townsendii*), pallid bat (*Antrozous pallidus*). *Status*: CDFW Species of Special Concern (SSC), as well as Fish and Wildlife Code Sections 86, 2000, 2014, 3007, Title 14, Sections 15380, 15382: Pallid bats and Townsend’s big-eared bats have potential to roost in the barn structures located on the Project site.

Nesting Raptors – white-tailed kite (*Elanus leucurus*), red-shouldered hawk (*Buteo lineatus*), American kestrel (*Falco sparverius*) *Status*: USFWS Migratory Bird Treaty Act and CDFW 3503.5: Raptors nest in a variety of substrates including, cavities, ledges and stick nests. Foraging habitat for raptors, such as white-tailed kite and red-shouldered hawk, among others, occurs throughout the Project area. The larger trees on the Kashia Coastal Reserve provide potentially suitable nesting habitat for American kestrels.

Nesting Passerines – including grasshopper sparrow and song sparrow, among others *Status*: USFWS Migratory Bird Treaty Act and CDFW Code 3503: Several passerine (perching birds) species may nest on the site in the various habitats, including, but not limited to, grasshopper sparrow in the grasslands and white-crowned sparrows in the shrubs, both species were observed on the two parcels.

No suitable habitat was found for California giant salamander (*Dicamptodon ensatus*) *Status*: CDFW Species of Special Concern or Western Pond Turtle (*Emys marmorata*) (WPT) *Status*: CDFW Species of Special Concern.

Wildlife Movement Corridors

Wildlife movement includes migration (i.e., usually one way per season), inter-population movement (i.e., long-term genetic flow) and small travel pathways (i.e., daily movement corridors within an animal’s territory). While small travel pathways usually facilitate movement for daily home range activities such as foraging or escape from predators, they also provide connection between outlying populations and the main corridor, permitting an increase in gene flow among populations.

These linkages among habitat types can extend for miles between primary habitat areas and occur on a large scale throughout California. Habitat linkages facilitate movement among populations located in discrete areas and populations located within larger habitat areas. The mosaic of habitats

found within a large-scale landscape results in wildlife populations that consist of discrete sub-populations comprising a large single population, which is often referred to as a meta-population. Even where patches of pristine habitat are fragmented, such as occurs with coastal scrub, the movement between wildlife populations is facilitated through habitat linkages, migration corridors and movement corridors. Depending on the condition of the corridor, genetic flow between populations may be high in frequency, thus allowing high genetic diversity within the population, or may be low in frequency.

As described in the *California Essential Connectivity Project* (Spencer, et al. 2010), the study area is located in North Coast Ecoregion. The natural drainages in the area (e.g., Stewarts Creek) flow west into the Pacific Ocean. The Study Area is not within a Natural Landscape Block (defined as relatively natural habitat blocks that support native biodiversity). The study area is not located in an Essential Connectivity Area (defined as areas that are essential for ecological connectivity between blocks).

Movement corridors for large and small mammals occur between the two parcels and undeveloped lands of Salt Point State Park and lands to the north. Although several intermittent drainages occur on both parcels, the drainages are situated on coastal bluffs, approximately 30 to 50 feet above the Pacific Ocean. As a result, none of the drainages support fisheries.

Regulatory Setting

Federal Regulations

Federal Endangered Species Act. Section 9 of the federal Endangered Species Act (ESA) protects federally- listed endangered and threatened wildlife species from unlawful take (16 U.S.C. § 1538 (a)(1)). “Take” is defined to mean “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct” (16 U.S.C. § 1532 (19)). In addition, federal agencies are required to determine whether the project is likely to jeopardize the continued existence of any species proposed to be listed under ESA or result in the destruction or adverse modification of critical habitat designated for such species (16 USC 1536[3], [4]). Projects that would result in “take” of any federally listed threatened or endangered species are required to obtain authorization from NMFS and/or USFWS through either Section 7 (interagency consultation) or section 10(a) (incidental take permit) of ESA, depending on whether the federal government is involved in permitting or funding the project.

Migratory Bird Treaty Act. The Migratory Bird Treaty Act (MBTA) regulates or prohibits taking, killing, possession of, or harm to migratory bird species listed in Title 50 Code of Federal Regulations (CFR) Section 10.13. The MBTA is an international treaty for the conservation and management of bird species that migrate through more than one country and is enforced in the United States by the USFWS. The MBTA was amended in 1972 to include protection for migratory birds of prey (raptors).

Federal Clean Water Act (Section 404). The objective of the Clean Water Act (CWA) is to restore and maintain the chemical, physical, and biological integrity of the Nation's waters. Under Section 404 of the CWA, the U.S. Army Corps of Engineers (USACE) has the authority to regulate activities that could discharge fill or dredge material or otherwise adversely modify wetlands or other waters of the United States. The USACE implements the federal policy embodied in Executive Order 11990, which, when implemented, is intended to result in no net loss of wetland values or function.

Federal Clean Water Act (Section 401). The State Water Resources Control Board (SWRCB) has authority over wetlands through Section 401 of the CWA, as well as the Porter-Cologne Act, California Code of Regulations Section 3831(k), and California Wetlands Conservation Policy. The CWA requires that an applicant for a Section 404 permit (to discharge dredged or fill material into waters of the United States) first obtain certification from the appropriate state agency stating that the fill is consistent with the State's water quality standards and criteria. In California, the authority to either grant certification or waive the requirement for permits is delegated by the SWRCB to the nine regional boards. The North Coast Regional Water Quality Control Board (NCRWQCB) has authority for Section 401 compliance in the Project site. A request for certification is submitted to the regional board at the same time that an application is filed with the USACE.

State Regulations

California Endangered Species Act. The California Endangered Species Act (CESA) prohibits the take of state-listed threatened or endangered species unless an incidental take permit is issued by CDFW pursuant to Section 2081 of the Act. The state definition of take is similar to the federal definition, except that the CESA does not prohibit indirect harm to listed species by way of habitat modification. Pursuant to the requirements of CESA, a State agency reviewing a project within its jurisdiction must determine whether any state-listed endangered or threatened species could be present and the extent to which the project could potentially result in take of such species. CDFW also maintains a Special Animals List which includes species considered of "Special Concern" in

California. A Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that typically meets the State definition of threatened or endangered but has not formally been listed; is experiencing serious (noncyclical) population declines or range retractions that, if continued or resumed, could qualify it for State threatened or endangered ; or has naturally small populations exhibiting high susceptibility to risk from any factor(s) that, if realized, could lead to declines that would qualify it for State threatened or endangered status.

Fish and Game Code Sections 1940, 3503, 3511, 3513 and 4150. Fish and Game Code Section 1940 requires CDFW to develop and maintain a vegetation mapping standard for the state. Over half the vegetation communities in the state have been mapped through the Vegetation Classification and Mapping Program.

Fish and Game Code Section 3503 addresses protection of Migratory Birds and Raptors. It states that it is unlawful to take, possess, or needlessly destroy the nests or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 protects all birds-of-prey (raptors) and their eggs and nests. Section 3511 protects species considered “fully protected”. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the Migratory Bird Treaty Act.

Fish and Game Code Section 4150 states a mammal occurring naturally in California that is not a game mammal, fully protected mammal, or fur-bearing mammal is a nongame mammal. A nongame mammal may not be taken or possessed under this code. All bat species occurring naturally in California are considered nongame mammals and are therefore prohibited from take as stated in Fish and Game Code Section 4150.

CDFW Lake and Streambed Alteration Agreement. Under Sections 1600-1616 of the California Fish and Game Code, the CDFW regulates activities that would alter the flow, bed, channel, or bank of streams and lakes. The limits of CDFW’s jurisdiction are defined in the code as the “... bed, channel or bank of any river, stream, or lake designated by the department in which there is at any time an existing fish or wildlife resource or from which these resources derive benefit.” (Section 1601). In practice, the CDFW usually marks its jurisdictional limit at the top of the stream or bank, or at the outer edge of the riparian vegetation, whichever is wider.

CDFW Wetlands Protection Regulations. CDFW derives its authority to oversee activities that affect wetlands from state legislation. This authority includes

Sections 1600-1616 of the Fish and Game Code (lake and streambed alteration agreements), CESA (protection of state listed species and their habitats - which could include wetlands), and the Keene-Nejedly California Wetlands Preservation Act of 1976 (states a need for an affirmative and sustained public policy program directed at wetlands preservation, restoration, and enhancement). In general, the CDFW asserts authority over wetlands within the state either through review and comment on USACE Section 404 permits, review and comment on CEQA documents, preservation of state listed species, or through stream and lakebed alteration agreements.

Porter-Cologne Water Quality Control Act. The Porter-Cologne Water Quality Control Act established the SWRCB and each Regional Water Quality Control Board (RWQCB) as the principal state agencies responsible for the protection of water quality in California. As noted above, the NCRWQCB has regulatory authority over the project site.

The Porter-Cologne Water Quality Control Act provides that “All discharges of waste into the waters of the State are privileges, not rights.” Waters of the State are defined in Section 13050(e) of the Porter-Cologne Water Quality Control Act as “...any surface water or groundwater, including saline waters, within the boundaries of the state.” All dischargers are subject to regulation under the Porter Cologne Water Quality Control Act, including both point and nonpoint source dischargers. The NCRWQCB has the authority to implement water quality protection standards through the issuance of permits for discharges to waters at locations within its jurisdiction. As noted above, the NCRWQCB is the appointed authority for Section 401 compliance in the project site.

California Environmental Quality Act. Although threatened and endangered species are protected by specific federal and state statutes, California Environmental Quality Act (CEQA) Guidelines Section 15380(b) provides that a species not listed on the federal or state list of protected species may be considered rare or endangered if the species can be shown to meet certain criteria. These criteria have been modeled after the definition in FESA and the section of the California Fish and Game Code dealing with rare or endangered plants and animals, and it allows a public agency to undertake a review to determine if a significant effect on a species that has not yet been listed by either the USFWS or CDFW (i.e., species of concern) would occur. Whether a species is rare, threatened, or endangered can be legally significant because, under CEQA Guidelines Section 15065, an agency must find an impact to be significant if a project would “substantially reduce the number or restrict the range of an endangered, rare, or threatened species.” Thus, CEQA provides an agency with the ability to protect a species from a project’s potential impacts

until the respective government agencies have an opportunity to designate the species as protected, if warranted.

California Coastal Act and Local Coastal Program. Through the California Coastal Act of 1976, the California Coastal Commission (Commission) became tasked with the protection of coastal resources including shoreline public access and recreation, lower cost visitor accommodations, terrestrial and marine habitat protection, visual resources, hazards, agricultural lands, commercial fisheries, industrial uses, water quality, offshore oil and gas development, power plants, ports, and public works facilities. For further explanation of the Commission's responsibilities, please see the California Coastal Act, Chapter 3 policies (Sections 30200 - 30265.5). Coastal Act policies encourage the productive maintenance and protection of marine resources and designated Environmentally Sensitive Habitat Areas (ESHAs). They also require that new development be located and designed to minimize risks to life and property from geologic hazards and flooding; and to avoid substantial alteration of natural landforms.

Local Coastal Programs (LCPs) are basic planning tools used by local governments to guide development in the coastal zone, in partnership with the Coastal Commission. LCPs contain the ground rules for future development and protection of coastal resources in coastal cities and counties. The LCPs specify appropriate location, type, and scale of new or changed uses of land and water. Each LCP includes a land use plan and measures to implement the plan (such as zoning ordinances). Prepared by local government, these programs govern decisions that determine the short- and long-term conservation and use of coastal resources. While each LCP reflects unique characteristics of individual local coastal communities, regional and statewide interests and concerns must also be addressed in conformity with Coastal Act goals and policies. Following adoption by a local government, an LCP is submitted to the Coastal Commission for review for consistency with California Coastal Act requirements.

After an LCP has been approved, the Commission's coastal permitting authority over most new development proposals is transferred to the local government, which applies the requirements of the LCP in reviewing proposed new developments. The Commission retains permanent coastal permit jurisdiction over development proposed on tidelands, submerged lands, and public trust lands, and the Commission also acts on appeals from certain local government coastal permit decisions.

Local Regulations

Local Sonoma County Coastal Plan. In 1981, Sonoma County adopted the Coastal Plan, Coastal Zoning Ordinance, and Coastal Administrative Manual planning documents prepared under specific requirements of State law that are intended to provide an intermediate level of detail between the 1978 General Plan and site development plans submitted to the County for approval. The current Coastal Plan is currently being updated. The Coastal Plan covers an area which is 55 miles in length and extends inland generally 1,000 yards from the mean tide line. In significant coastal estuarine habitat and recreational areas, it extends inland to the first major ridgeline paralleling the sea or five miles from the mean high boundary is generally 3000 to 12,000 feet inland from shoreline, except around Duncan Mills, Willow Creek and Valley Ford, where it extends up to five miles inland.

The Environment Chapter of the Coastal Plan identifies rare and endangered plant locations, bird and animal habitats, wetlands, riparian corridors and other areas which are very sensitive to disturbance are mapped as Sanctuary Preservation or Conservation areas. In Sanctuary Preservation areas, essentially no development other than nature trails is allowed. In Conservation Areas no development is allowed unless an environmental study determines that the project can be accomplished with no adverse effects. Other management recommendations are proposed for each specific resource or habitat area.

Sonoma County General Plan 2020. The Sonoma County General Plan Open Space and Resource Conservation (OSRC) Element provides guidance for the protection of biological resources in Sonoma County as set by its citizens and elected officials (Sonoma County 2016). The plan includes the following goals and policies related to biological resources applicable to the project:

Goal OSRC-7: Protect and enhance the County's natural habitats and diverse plant and animal communities.

Objective OSRC-7.1: Identify and protect native vegetation and wildlife, particularly occurrences of special status species, wetlands, sensitive natural communities, woodlands, and areas of essential habitat connectivity.

Objective OSRC-7.5: Maintain connectivity between natural habitat areas.

Objective OSRC-7.6: Establish standards and programs to protect native trees and plant communities. **Objective OSRC-7.7:** Support use of native plant species and removal of invasive exotic species.

Goal OSRC-8: Protect and enhance Riparian Corridors and functions along

streams, balancing the need for agricultural production, urban development, timber and mining operations, and other land uses with the preservation of riparian vegetation, protection of water resources, flood control, bank stabilization, and other riparian functions and values.

Objective OSRC-8.3: Recognize and protect riparian functions and values of undesignated streams during review of discretionary projects.

Policy OSRC-8d: Allow or consider allowing the following uses within any streamside conservation area:

(2) Streamside maintenance and restoration

(4) Road crossings, street crossings, utility line crossings

(11) Creekside bikeways, trails, and parks within Urban Residential, Commercial, Industrial, or Public-Quasi Public land use categories.

2. Impacts

- a. *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?* **Less than significant with mitigation incorporated.**

Special status wildlife species with the potential to occur at the Project site include: Western Bumble bee, Lotus blue butterfly, Behren's silverspot butterfly, California Red-legged Frog, Burrowing owl, American badger, Roosting bats – including Townsend's big-eared bat, pallid bat, Nesting Raptors – white-tailed kite, red-shouldered, American kestrel, and Nesting Passerines – including grasshopper sparrow and song sparrow.

Direct impacts could include removal or disturbance of suitable habitat required by these species during construction as well as disturbance, injury, or mortality of individual animals or plants. Indirect impacts could occur as a result of maintenance and operation activities that affect habitat and wildlife within and in the vicinity of the trail alignments. Construction-related activities could result in destruction of individual plants or populations of plants that may be located near or within the proposed trails at the time of ground disturbance. In addition, visitors ignoring posted use regulations could harm individual plants and animals or adversely affect habitat values. Signs would be installed at several locations along each trail to educate trail users about use regulations, including the requirement to stay on the trail and not trespass outside the trail area. If users are found to be in non-compliance with this

measure, a fine may be imposed by a ranger at any time. The following lists the species potentially affected and the mitigations for each species.

Western Bumble bee (*Bombus occidentalis*) is a possible inhabitant of the Project site. Measures listed subsequently in this section to protect wetlands and native plants on the site will provide for necessary habitat for the bees. The Biological Assessment report did not recommend further action for this species.

Lotus blue butterfly (*Lycaeides argyrognomon lotis*). Harlequin lotus is the larval food plant for this species and was found on both the proposed Kashia Coastal Reserve Trail and the Stewarts Point Ranch Trail. Should this species occur on the site during Project construction, impacts could be the same as listed for the previous butterfly species.

Behren's silverspot butterfly (*Speyeria zerene behrensii*) is present on Coastal Terrace Prairie communities north and south of the Project area. Should this species occur on the site during Project implementation, impacts would be the same as listed above.

The following mitigations apply to the impacts on butterflies. The first three mitigations apply to the impacts on all special status species and resources.

Mitigation Measure BIO-1 - Contractor/Worker Awareness Training

All construction workers shall receive environmental awareness training to be conducted by a qualified biologist. The training may also be conducted with a site -specific electronic presentation. Training shall include how to recognize all special-status plant/wildlife species, their preferred habitat potentially present in the Project site, applicable laws and regulations regarding each species, actions to take if a special-status species is observed during construction activities (including contact information of the monitoring biologist, purpose of protective measures and documentation of best management practices (BMPs) and other required mitigation measures that were used). They shall also be instructed as to sensitive resource areas, including wetlands and waters of the U.S., to avoid within the Project site other than where impacts have been authorized, and relevant laws and regulations for each resource.

Mitigation Measure BIO-2 - Trail Alignment Fencing and Interpretive Signage

Fencing shall be used in strategic areas to protect sensitive biological resources. The monitoring biologist will provide recommendations for where fencing should be placed to protect sensitive resources. Fencing would be used to minimize trampling and disturbance to on-site special-status plant populations, harassment, disturbance, injury and/or mortality to on-site special-status wildlife species, degradation to aquatic/riparian features; and/or disturbance to nesting native bird species. New or relocated fencing and gates would only be located where trails are adjacent to sensitive biological habitats or areas where special-status plant and/or wildlife species are known to occur. Fencing will be designed and reviewed by the monitoring biologist to allow movement of wildlife species.

Interpretive signage will be provided in the staging areas to provide information about staying on the trail and avoiding damaging sensitive plant and wildlife species and other sensitive resources.

Mitigation Measure BIO-3 - Construction Schedule

SCRIP will structure the Project construction schedule to minimize and avoid impacts to special-status species and sensitive habitats, to the greatest extent possible. The conceptual construction schedule is based upon the avoidance periods for each species and habitat of concern, as well as regulatory constraints. The conceptual construction schedule may change based on completion of the CEQA processes, the construction bid process, regulatory permit conditions, and special conditions contained within the regulatory permits. SCRIP will remove trees and shrubs in advance of bird-nesting season. Implement appropriate measures in the storm water pollution prevention plan and install exclusionary fencing to prevent CA red-legged frog and other sensitive species from entering/ re-entering work areas.

SCRIP will conduct ground-disturbing construction activities associated with the Project during this timeframe with the exception of vegetation removal, which will be conducted to avoid impacts to sensitive animal species. Construction activities that are not ground disturbing may occur before and after this timeframe.

Mitigation Measure BIO-4 - Special Status Species Butterflies

To avoid/minimize direct and indirect impacts to special status butterfly species within or adjacent to the proposed trail corridors as a result of Project implementation, the following measures shall be implemented.

A pre-construction survey shall be performed no sooner than 30 days prior to the onset of construction to identify the presence of host plant species along both trail corridors, and staging areas. If any host plants are observed within areas proposed for ground disturbance, they shall be marked with pin flags and surveyed to determine if any butterfly eggs, larva or pupa are attached to the plants. If any of these life stages of the butterfly are observed attached to the plants, the plants shall be avoided until the pupa has metamorphosed into adult butterflies and are no longer attached to the host plants.

If avoidance of host plants is not considered possible, a qualified botanist shall be consulted to prepare a translocation plan to transplant the plants, once any pre-adult life stages of the butterfly are determined not to be present, to a suitable location on the Project site. The plan shall contain, at a minimum, the following: (a) goals and objectives of the transplantation; (b) methods of collection and transplantation; (c) location of the area(s) on site in which the plants will be transplanted; (d) monitoring methods and timing; (e) success criteria; and (f) measures to be taken in the event that the transplantation is not successful. In addition, the plan shall be approved by the County and by the USFWS since these butterfly species are federally listed as endangered.

California red-legged frog (*Rana draytonii*) has not been reported within three miles of the Project area. Construction-related impacts can include direct harm or mortality to individual animals as a result of construction of wetland crossings, erosion and/or siltation that can adversely affect egg masses. Destruction of suitable upland refugia habitat adjacent to drainages can occur in the form of grading or laying gravel for parking or equipment staging areas. Indirect impacts from trail users can include disturbance of CRLF at wetland crossings, disturbance of eggs, tadpoles or adult frogs by users that go off trail and into the drainages or along edges of drainages, and siltation of drainages by users that go off-trail and wander along edges of drainages. Potential direct or indirect impacts associated with construction and operation of the trail is considered a potentially significant impact.

Mitigation Measure BIO-5 - California Red-legged Frog

To avoid/minimize direct and indirect impacts to California red-legged frog (CRLF) within or adjacent to the proposed trails as a result of Project implementation, the following measures shall be implemented:

1. SCRCP will design the trail and associated facilities with appropriate spanning structures (bridges/boardwalks) to avoid foot traffic in sensitive wetland and riparian habitats.
2. The Contractor will perform major ground-disturbing work, such as excavation, grading and pier installation, during the dry-season to minimize impact to California red-legged frog (CRLF). The dry-season is typically May 15 – November 30, when rainwater has receded and standing water is not present.
3. SCRCP will conduct a pre-construction survey for CRLF 48-hours prior to the onset of construction activities. Construction activities will only be allowed in areas that have been surveyed.
4. SCRCP will conduct a pre-construction training session for all construction crew members. The training will include discussion of the sensitive biological resources within the Project area and the potential presence of special-status species. A discussion of CRLF status, life history characteristics, protection measures to ensure CRLF and other sensitive resources are not impacted by construction activities and the work area boundaries will also be included.
5. The Contractor will install and properly maintain temporary wildlife exclusionary fencing around the work area in sensitive wetland and riparian habitats to preclude CRLF from entering the construction area following the pre-construction survey. Exclusionary fencing should include all sensitive wetland areas, including US Army Corps of Engineers, CDFW, and California Coastal Commission jurisdictional wetlands.
6. SCRCP will conduct regular assessments of the work area during construction activities to ensure no CRLF or other species have entered the work area and are being impacted by construction activities. If CRLF are encountered during construction, SCRCP will have CRLF relocated by an US Fish and Wildlife Service-approved

biologist, following consultation with the US Fish and Wildlife Service and the California Department of Fish and Wildlife.

7. SCRCP will install signage in the trailhead and along the trail to inform visitors of the sensitive habitats and species within the Project area and requiring visitors to remain on the trail to avoid impacts to the sensitive habitats and species.

Burrowing owl (*Athene cunicularia*). Although no Burrowing owl were observed during site visits, the Project area provides suitable nesting and foraging habitat for burrowing owl and this species could utilize any ground squirrel burrow along the trail corridors. If present, construction-related activities could potentially result in injury or mortality to individual burrowing owls and/or active nest burrows (including eggs and/or chicks) as a result of equipment or vehicles collapsing an active burrow. Construction activities could also cause an adult owl to abandon an active nest that is in close proximity to the ground disturbance area and therefore leave eggs or chicks vulnerable to predation or without provisions. Increased human activity immediately adjacent to an active nest burrow due to trail use after construction, or due to off-trail use by visitors in an area containing active owl burrows, could also cause adult owls to abandon an active burrow resulting in likely mortality of any eggs or young. Potential direct or indirect impacts associated with construction and operation of the trail is considered a potentially significant impact.

Mitigation Measure BIO-6 - Burrowing Owl

To avoid/minimize direct and indirect impacts on burrowing owls as a result of Project implementation, the following measures shall be implemented:

1. Protocol-level surveys for burrowing owls shall be conducted 30 days prior to scheduled construction activity that is conducted during the breeding season (March through August) to determine whether burrowing owls are present on site and, if so, their breeding status. Surveys shall be conducted by a qualified biologist with experience conducting such surveys.
2. If during surveys, burrows are observed being used by non-nesting burrowing owls within the construction footprint, construction work shall cease until owls are evacuated from

any such burrow using a California Department of Fish and Wildlife-approved burrow closure procedure in accordance with the California Department of Fish and Game “Staff Report on Burrowing Owl Mitigation” (CDFW 2012) and by a qualified biologist. Once owls from any such burrow have been successfully evacuated, the burrow can be collapsed and construction work can proceed.

3. If nesting burrowing owls are observed during these surveys, construction work within 300 feet of active nest burrows shall be delayed until young have fledged and are independent of the nest burrow, as determined by a qualified biologist. The qualified biologist may reduce the 300-foot setback based on the type, timing, extent, and intensity of the construction activity and other factors such as site topography and vegetation cover between the construction activity and the burrow. Once any young have fledged and are no longer dependent upon the nest burrow, the same burrow closure procedure described above shall be used to confirm the burrow is inactive before ground disturbance activities can continue near the burrow.

American Badger (*Taxidea taxus*). The American badger is a California designated as a Species of Special Concern. This mammal has no federal status. It is found in a variety of habitats, especially in open habitats such as oak-savannah and grasslands where its presence is typically identified by its distinctive, large underground dens (burrows) excavated in friable (loose) soils. In the region, this animal is uncommon. This nocturnal mammal is rarely directly observed. Except during breeding, badgers are typically highly solitary and have vast home ranges.

Badgers have large territories and hunt in particular areas where their small rodent prey is abundant and can be easily dug out of their burrows. Badgers move opportunistically to find prey and to establish maternity burrows. Female give birth to young underground in March and April with an average litter size of 2 or 3. Newborns remain underground until the age of 6 – 8 weeks old. In July through August, the young badgers disperse to live in their own burrows. Adult badgers do not show long-term faithfulness to particular dens, except reproductive dens, until young disperse. Badgers observed in one area in one year may not be present in following years, which appears to be the case within the Project area.

American badger is known to occur in the Project area, and suitable habitat exists for this species within the site. The site is likely used for breeding, cover and foraging by this species, and could also be used as a movement corridor between adjacent patches of suitable habitat. If occurring on the Project site within proposed ground disturbance areas just prior to or during construction, potential direct impacts include direct harm or mortality to individual animals, loss of active dens, and loss of suitable denning and foraging habitat. Potential indirect impacts include disturbance to active dens as a result of off-trail use by visitors. Potential direct or indirect impacts associated with construction and operation of the trail is considered a potentially significant impact.

Mitigation Measure BIO-7 - American Badger

The Construction Bid Documents will specify that the Contractor conduct ground-disturbing activities, including vegetation removal in habitat areas only between September 1 and February 28 to avoid the natal season for American badger. If it is not feasible to conduct ground-disturbing activities, including vegetation removal and grading to avoid natal season for the American badger in these habitat areas then SCRP will complete the following:

1. To ensure there are not direct impacts to American badger, a qualified biologist shall conduct a pre-construction den survey no more than 21 days prior to site grading. The area to be surveyed will include all construction sites and staging areas in suitable habitat areas for which vegetation removal and grading is required, to a buffer of 150 feet outside the boundary of the area to be cleared. Survey results will remain valid for a period of 21 days following the date of the survey.
2. If a potential den is located, infrared camera stations will be set up and maintained for three (3) consecutive nights at the potential den openings prior to initiation of grading/work activities to determine the status of the potential dens.
3. If American badger is not found to be using the den, the burrow can be filled (using hand work and shovels) and site grading may proceed in the vicinity of this burrow(s) unhindered. However, if American badger is found using a den site within the area of proposed grading, provided it is not a natal den, the badger will

be passively and humanely evicted from its den if it could be impacted by grading or other construction activities.

- Exclusion techniques will be used to passively relocate any badgers that are present in the Project work area, or within 150 feet of Project activities at the discretion of the qualified biologist.
 - Exclusion techniques, such as installation of a one-way door in the burrow entrance, would exclude badgers from entering the burrow. Burrows with exclusion techniques will be monitored to confirm badger usage has been discontinued. After badger use has been discontinued, burrows outside the Project work area, but within 150 feet of construction activities, will be temporarily covered with plywood sheets or similar material. Burrows within the Project work area will be hand-excavated and collapsed to prevent reoccupation.
4. If a natal den is found, then an eviction plan will be prepared and submitted to CDFW for discussion and approval. Evictions shall not occur until CDFW approves the passive eviction plan. The Construction Contractor will be directed to postpone all ground-disturbing construction activities, including vegetation removal, within 100 feet of the active natal burrow. No ground-disturbing activity will be allowed to occur within this area until it is determined that the young have dispersed the natal burrow.
 5. SCRP will include information about sensitive habitats and the nocturnal presence of American badgers as part of the interpretive signage program associated with this Project.

Roosting Bats—**Townsend’s big-eared bat** (*Corynorhinus townsendii*) and **Pallid bat** (*Antrozous pallidus*) are both known to occur in the vicinity of the Project site. Townsend’s big-eared bat is sensitive to human disturbances and activities. The trail is proposed to be constructed within 25 feet of the existing barn on the Kashia Reserve and within 100 feet of the barn on Stewarts Point Ranch. The staging area would not be located near any structures.

Although the structures would not be directly affected by trail construction, pallid bats utilizing these structures could be adversely affected by construction noise. Potential direct effects with respect to

general construction-related noise on bats include acute acoustic trauma, degradation of physiological condition and social order, avoidance of foraging areas, and disturbance from and/or abandonment of roost sites. In particular, loud ultrasonic noise (i.e., those having frequencies above the range of human hearing >20 kilohertz [kHz]) can deter bats from accessing and using known roosts. Depending on noise attenuation rates and other factors, construction equipment such as graders, dozers and diesel engines can produce sound at a dBA that is high enough to disturb roosting bats. Similarly, studies have shown that high frequency laser survey tools inaudible to the human ear, but within range of bat auditory capabilities (19-28 kHz), can also disturb active roosts.

Trail construction would be done by hand tools and in some areas with the use of small equipment. Use of such tools in constructing the portion of the trail closest to the structures is not expected to generate noise levels that would adversely affect any roosting bats. Construction would primarily occur during the summer months when pallid bats, if utilizing the structure, would likely be present.

Noise levels and human activity associated with construction of the trails and staging areas would be temporary and expected to last approximately four weeks. Therefore, they are not expected to adversely affect individual bats that are using the structure as a roost site. However, adverse noise and disturbance impacts could occur if a maternity roost was within a structure at the time of construction activities. Potential direct or indirect impacts associated with construction and operation of the trail is considered a potentially significant impact.

Signage would be provided regarding site management, activities, allowable uses, hours, maps, and interpretive signage with information on the species adjacent to the trails, particularly in close proximity to sensitive resource areas. Therefore, potential direct and indirect impacts associated with trail operations are not expected to significantly impact bats that may be using structures as roost habitat.

Mitigation Measure BIO-8 - Special-Status Bats

To ensure that the noise of construction equipment would not adversely affect any maternity roosts that could occur adjacent to existing structures, a pre-construction survey shall be conducted by a qualified bat biologist to determine if active maternity roosts exist within the

structure. If maternity roosts are observed, and construction of the access road and/or staging areas adjacent to the barn or outbuilding would occur at the time the roosts are active, equipment emitting ultrasonic noise (i.e., those having frequencies above the range of human hearing >20 kilohertz [kHz]) shall be prohibited from the construction area until the maternity roost is no longer active, as determined by the qualified bat biologist. Alternatively, equipment that emits noise with frequencies <20 kHz can be used to grade and prepare the access road and staging areas adjacent to the barn and outbuilding. Fencing may also be used as necessary to keep users on trail and away from the barn and roosting bats.

Nesting Raptors – white-tailed kite (*Elanus leucurus*), red-shouldered hawk (*Buteo lineatus*), American kestrel (*Falco sparverius*) The site provides foraging habitat for raptors, such as white -tailed kite and red-shouldered hawk, among others, occurs throughout the Project area. The larger trees on the Kashia Coastal Reserve provide potentially suitable nesting habitat for American kestrels.

The grasslands provide suitable foraging and wintering habitat. Construction activities could cause an adult raptor to abandon an active nest that is in close proximity to the ground disturbance area and therefore leave eggs or chicks vulnerable to predation and inclement weather conditions, and without provisions. Increased human activity immediately adjacent to an active nest due to trail use after construction, or due to off-trail use by visitors in an area containing an active nest, could also cause adult kites to abandon an active nest resulting in likely mortality of any eggs or young. Potential direct or indirect impacts associated with construction and operation of the trail is considered a potentially significant impact.

Nesting Passerines –grasshopper sparrow and song sparrow were observed in the Project area. Suitable nesting and foraging habitat for these species occurs on the Project site. Should any of these species be nesting on the site prior to Project implementation, impacts in the form of direct harm or mortality to individual animals during vegetation removal and trail construction, loss of active nest sites due to vegetation removal, or abandonment of active nest sites and possibly due to increased human presence associated with off-trail use could occur. Potential direct or indirect impacts associated with construction and operation of the trail is considered a potentially significant impact.

Mitigation Measure BIO-9 - Native Nesting Birds

The Construction Bid Documents will stipulate that the Construction Contractor can only remove trees, shrubs, and other vegetation between August 31 and February 15 to avoid migratory bird-nesting season. If it is not feasible to remove vegetation within this window, then SCRIP will complete the following:

1. Conduct a bird-nesting survey at least seven (7) days prior to ground-disturbing activities in a specific construction work area, including vegetation removal. The area to be surveyed will include all construction activity areas, including staging areas, for which vegetation removal is required, to a buffer of 150 feet outside the boundary of the area to be cleared. Survey results will remain valid for a period of 21 days following the date of the survey.
2. If an active nest is found, Regional Parks will consult with the CDFW to determine the appropriate buffer size and then establish the buffer zone around the occupied nest, using fencing, pin flags, yellow caution tape, or other CDFW-approved material. Vegetation clearing and construction activities will be postponed within the buffer zone; no construction-related activity will be allowed to occur within this area until it is determined that the young have fledged, the nest is vacated, and there is no evidence of second nesting attempts. SCRIP will require a qualified biologist regularly monitor the buffer area during construction activities to evaluate the nest(s).
3. If an active nest is found after the completion of the pre-construction surveys and after construction activities have begun, all construction activities will cease immediately until a qualified biologist has evaluated the nest and a CDFW-approved buffer zone has been created. If establishment of a buffer zone is not feasible, SCRIP will contact CDFW for further avoidance and impact minimization guidelines.

Special Status Plants. As described in the Setting section, four plant species, coastal bluff morning-glory (*Calystegia purpurata* ssp. *saxicola*), harlequin lotus (*Hosackia gracilis*), purple-stemmed checkerbloom (*Sidalcea malviflora* ssp. *purpurata*), and fringed corn lily (*Veratrum fimbriatum*) have a moderate or high potential to occur. Several special-status wildlife and plant species are known or have the potential to occur

within the Project area including the proposed trail corridors. These plants can be destroyed during trail construction as well as by off-trail use of recreational visitors.

Mitigation Measure BIO-10 - Special-Status Plants

1. To avoid/minimize direct and indirect impacts to special-status plant populations within or adjacent to the proposed trail corridors as a result of Project implementation, the following measures shall be implemented:
2. SCRCP will contract with a qualified biologist (botanist or plant ecologist) to conduct a focused survey for special status plant species in habitat areas that can support these species during their blooming period, prior to the on-set of ground-disturbing activities.
3. Based on the survey results, SCRCP or a qualified biologist will flag areas with special status species prior to the onset of ground-disturbing activities. The Contractor will avoid impacts to marked populations and individuals of these species.
4. If disturbance cannot be avoided, SCRCP will consider re-aligning the affected trail segment where possible. If trail re-route is not possible, SCRCP will consult with the CDFW to develop and implement a plan to harvest and re-locate, collect seed collection or re-seed and replant (a Habitat Mitigation and Monitoring Plan or HMMP).
5. The HMMP will specify that relocation/re-seeding or planting occur at a level necessary to ensure at least a 1:1 survival rate, meaning one surviving replanted individual for every individual removed or impacted (take) in order to construct the Project.
6. SCRCP will conduct a mandatory Contractor / Worker Awareness Training, instructing workers how to identify and avoid “take” of special status plant species. If such species are observed during construction activities that were not identified during pre-construction surveys, work will immediately cease in the vicinity of the discovery until SCRCP develops and implements additional mitigation measures and authorizes work continuation.
7. SCRCP will include information about sensitive plant habitats as part of the interpretive signage program associated with this trail Project.

Mitigation Monitoring and Reporting for Biological Impacts to Sensitive Resources

Mitigations will be implemented by SCRP and qualified biologists working under SCRP or the Construction Contractor. Each of the required actions will be monitored for implementation by SCRP, the qualified biologist, or another qualified designee approved by SCRP. SCRP will be responsible for successful implementation and completion.

Impact Significance After Mitigation

Implementation of mitigation measures outlined in this section would avoid/minimize direct and indirect impacts to sensitive plant and wildlife species and communities by ensuring that any sensitive species within proposed ground disturbance areas are avoided to the extent possible and reduce potential impacts to a less-than-significant level with mitigation incorporated.

- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?* **Less than significant with mitigation incorporated.**

Table 2 summarizes the temporary and permanent impacts to the several plant communities existing on the site. Two special status vegetation communities, coastal terrace prairie, and coastal scrub riparian occur in the Project area and would be affected by trail implementation. The seasonal wetlands are also identified as special status plant communities based on the CDFW natural communities list. As a result of construction and/or operation and maintenance of the proposed trail system, potential impacts could occur to these communities.

Table 2: Potential Impacts to Plant Communities

Plant Community	Total Project Area*		Temporary Impacts		Permanent Impacts	
	SF	Acres	SF	Acres	SF	Acres
Stewarts Point Segment						
Barren and Sparsely Vegetated	182,956	4.2	0	0	0	0
Herbaceous/Coastal Terrace Prairie Grassland	3,245,520	74.5	101,416	2.33	27,174	0.63
Seasonal Herbaceous Wetland	71,427	1.64	880	0.02	220	0.005
Riparian Forest	12,722	0.29	0	0	0	0
Riparian Shrub	79,306	1.82	1,540	0.04	385	0.009
Kashia Segment						
Barren and Sparsely Vegetated	360,461	0.83	0	0	0	0
Conifer Forest	333,241	7.65	24,880	0.57	6,220	0.14
Shrub/Coastal Scrub	36,678	0.84	0	0	0	0
Herbaceous/Coastal Terrace Prairie Grassland	1,040,061	23.88	122,412	2.81	34,394	0.78
Total						
Barren and Sparsely Vegetated	543,417	12.48	0	0	0	0
Conifer Forest	333,241	7.65	24,880	0.57	6,220	0.14
Shrub/Coastal Scrub	36,678	0.84	0	0	0	0
Herbaceous/Coastal Terrace Prairie Grassland	4,285,581	98.38	223,828	5.14	61,568	1.41
Seasonal Herbaceous Wetland	71,427	1.64	880	0.02	220	0.005
Riparian Forest	12,722	0.29	0	0	0	0
Riparian Shrub	79,306	1.82	1,540	0.04	385	0.009

Direct adverse impacts to these sensitive communities include removal or disturbance of these habitats during construction, including impacts associated with proposed bridge crossings. Removal of vegetation within riparian areas, or disturbance to the bed, bank, and/or channel of the drainages would require authorization from the CDFW in the form of a Streambed Alteration Agreement pursuant to Section 1602 of the California Fish and Game Code.

Indirect impacts to these sensitive natural communities include runoff and siltation during and immediately after construction, as well as the potential for increased off-trail human disturbance within these areas after the trail is completed. Direct impacts primarily include trampling, cutting, and/or removal of individual plants or plant populations.

Ground disturbance and construction activities within the Project could result in the disturbance and/or destruction of vegetation and wildlife habitat within sensitive natural communities, causing a reduction in the ecological functions and values of these communities. These are potentially significant impacts.

Mitigation Measure BIO-11 - Coastal Terrace Prairie, Seasonal Wetlands and Coastal Scrub Riparian Communities

To avoid/minimize direct and indirect impacts to Coastal Terrace Prairie, Seasonal Wetlands and Coastal Scrub Riparian Communities within or adjacent to the proposed trail corridors as a result of Project implementation, the following measures shall be implemented:

1. Exclusionary fencing shall be installed during construction to avoid riparian vegetation where bridges are proposed. Sediment and erosion control measures shall be utilized that can include, but are not limited to, biodegradable straw wattles free from weed seed, silt fencing, hydroseeding, or biodegradable erosion control mats/blankets.
2. If riparian vegetation removal and/or disturbance to the bed, bank, or channel of the central drainage is necessary, a Streambed Alteration Agreement (SAA), pursuant to Section 1602 of the California Fish and Game Code, shall be procured from the California Department of Fish and Wildlife (CDFW) prior to any disturbances to these areas. As part of the SAA, compensatory mitigation may be required to offset the loss of riparian habitat. If so, a mitigation plan shall be prepared to

address implementation and monitoring requirements under the SAA to ensure that the Project would result in no net loss of habitat functions and values. The plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, performance criteria, monitoring methods, and actions to be taken in the event that the mitigation is not successful. Mitigation may be required at a ratio directed by the SAA.

3. A pre-construction survey shall be completed prior to the onset of construction to identify and quantify the plants along or immediately adjacent to the proposed trail corridors that could be potentially removed or disturbed. If removal or disturbance of any of these plant communities would occur, a planting plan shall be prepared to offset the loss of any vegetation/plants to be removed or disturbed. Propagation and planting outside of the trail corridor(s) may be required on a 1:1 basis to ensure no net loss of these sensitive natural communities.
4. SCRP will:
 - a. Plant native trees and shrubs at a 3:1 ratio for any trees removed that have a breast-height diameter of 6-inches or greater. In the case of removal of non-native species, a suitable native species will be selected for replanting.
 - b. Hydroseed and/or direct seed the temporary construction areas with a seed mix based on the native grasses, forbs, and flowers disturbed to construct the Project.
 - c. In order to maintain the genetic integrity and diversity of native plants, revegetation will utilize on-site seed stock to the maximum extent possible.
 - d. The final installation/placement of the trail shall be finalized in the field to avoid/minimize the placement of the matting over patches of sensitive vegetation. Prior to installation, appropriate signage shall be placed at the beginning of the access trail and at appropriate locations along the trail prohibiting off trail use. The signage shall also include information on the sensitivity of habitat areas

Mitigation Monitoring and Reporting

Mitigations will be implemented by SCRCP and qualified biologists working under SCRCP or the Construction Contractor. Each of the required actions will be monitored for implementation by SCRCP, the qualified biologist, or another qualified party approved by SCRCP. SCRCP will be responsible for successful implementation and completion.

Impact Significance After Mitigation

Implementation of mitigation measures outlined in this section would avoid/minimize direct and indirect impacts to sensitive natural communities by ensuring that any communities within proposed ground disturbance areas are avoided to the extent possible and reduce potential impacts to *less-than-significant with mitigation incorporated*.

- c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? **Less than significant with mitigation incorporated.***

The Project site supports 4,677 square feet (SF) of Corps jurisdictional wetlands (including swales, seasonal wetlands, and wetland meadows) 14,923 SF of CCC wetlands and 2,327 SF of waters of the U.S., primarily in the form of ephemeral and intermittent drainages 1-2 feet wide (see Table 3). These features are anticipated to meet the criteria for jurisdictional waters of the United States based on the jurisdictional delineation conducted on the Project site and analysis of the three parameters for wetlands (soils, hydrology, and vegetation).

Table 3: Potential Wetland Impacts

Jurisdiction	Temporary Impacts (sq. ft)	Permanent Impacts (sq. ft)
Stewarts Point Segment		
Federal (USACE)		616
State (CCC)	3114	756
Kashia Segment		
Federal (USACE)	1740	385
State (CCC)	3900	1125
Total		
Federal (USACE)	4298	1001
State (CCC)	7014	1881

Any fill or dredging of the drainage, which is assumed to be jurisdictional waters of the U.S., associated with the installation of the crossing would require prior authorization from the ACOE in the form of permits pursuant to Section 404 of the Clean Water Act. Several drainage crossings are proposed over swales and ephemeral drainages on the Project site. Any fill or removal of these features, if confirmed to be jurisdictional by the ACOE, would also be subject to regulatory permitting by the ACOE.

Indirect impacts to the jurisdictional features on the Project site include runoff and siltation as a result of construction vehicles and heavy equipment during and immediately after trail construction activities and construction upslope of these features, as well as the potential for disturbance, erosion, and other adverse effects due to the potential for increased off-trail human activities within and adjacent to these areas after the trails are completed.

Impacts to wetlands and waters include permanent loss as well as a reduction in the ecological functions and values of these features. This is considered a potentially significant impact.

Mitigation Measure BIO-12 - Wetlands

To avoid/minimize direct and indirect impacts to wetlands within or adjacent to the proposed trail corridors as a result of Project implementation, the following measures shall be implemented:

1. The proposed trails and bridge crossings shall avoid mapped jurisdictional wetland areas and waters of the U.S. to the extent feasible. Areas of temporary disturbance due to construction shall be restored to pre-construction condition. Drainage crossings shall be designed to avoid wetland disturbance. Prior to the initiation of ground disturbance activities within 100 feet of wetland habitat areas, sediment and erosion control measures shall be utilized that can include, but are not limited to, biodegradable straw wattles free from weed seed, silt fencing, hydroseeding, or biodegradable erosion control mats/blankets.
2. If wetland areas or other waters of the U.S. under the jurisdiction of the ACOE are disturbed in order to install drainage crossings, an individual or Nationwide permit from the ACOE shall be obtained prior to any ground disturbance that could result in fill or removal of wetlands or waters of the U.S. As part of the ACOE permit, compensatory mitigation may be required, at a ratio to be determined by the ACOE, to offset the loss of wetland/waters habitat. If so, and as part of the permit application process, a mitigation and monitoring plan (MMP) shall be prepared to address implementation and monitoring requirements under the permit to ensure that the Project would result in no net loss of habitat functions and values. The plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, monitoring methods and performance criteria, extent of monitoring to be conducted, actions to be taken in the event that the mitigation is not successful, and reporting requirements.

Mitigation Monitoring and Reporting

Mitigations will be implemented by the Contractor, SCRIP and qualified biologists working under SCRIP or the Construction Contractor. Each of the required actions will be monitored for implementation by SCRIP, the

qualified biologist, or another qualified designee approved by SCRP. SCRP will be responsible for successful implementation and completion.

Impact Significance After Mitigation

Implementation of mitigation measures outlined in this section would avoid and minimize direct and indirect impacts to wetlands and non-wetland waters of the U.S. by ensuring that any wetlands are avoided to the extent possible, providing for compensatory wetland replacement and reduce potential impacts to less-than-significant with mitigation incorporated

- d. *Would the project 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? **Less than significant impact.***

Movement corridors for large and small mammals occur between the two parcels and undeveloped lands of Salt Point State Park and lands to the north. Although several intermittent drainages occur on both parcels, the drainages are situated on coastal bluffs, approximately 30 to 50 feet above the Pacific Ocean. As a result, none of the drainages support fisheries. With implementation of mitigation measures listed previously in this section, the design of any fencing along the trails would be such that wildlife movement perpendicular to the fencing would not be adversely inhibited. Therefore, no substantial direct impact to local or regional wildlife movement is expected to occur as a result of the trails.

The mainly open habitat on the site allows travel onto and through the site. The principal constraint on movement is SRI that constitutes a hazard for wildlife moving east-west. The trail itself will not block wildlife movement. Fencing is designed to allow animals to pass beneath it. Therefore, no substantial direct impact to local or regional wildlife movement is expected to occur as a result of the trails.

Although visitor use of the trails may periodically inhibit daytime movement of some wildlife species on the site, most wildlife species in the region tend to be more active at night and would, therefore, not be harassed or substantially inhibited by visitors as the trail system would be closed to visitors at night. Trail construction would occur during daylight hours. Because trail construction would be temporary in nature and limited to the proposed corridor and the area immediately adjacent to the trail, disturbance associated with trail construction would not

substantially affect daytime wildlife movement. The drainages on the Project site do not support fish, so there would be no impact on fish movement. Therefore, impacts would be less than significant.

- e. *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?* **Less than significant with mitigation incorporated.**

No protected trees as defined in the Sonoma County Code, Article 02. Sec. 26-02-010 will be removed as part of this Project. The Project site is not within a County Riparian Corridor Combining Zone and is not subject to Article 65 of the Zoning Code regarding creek setbacks for development activities.

The Project area is within the Sonoma County Coastal Zone and is subject to the Local Coastal Program and Plan with regards to protection of wetlands and mitigation of impacted wetlands, view corridors.

The Sonoma County Coastal Plan along with General Plan policies encourage the productive maintenance and protection of Environmentally Sensitive Habitat Areas (ESHAs).

Pursuant to Sections 30231 and 30233 of the California Coastal Act, the California Coastal Commission (CCC) requires that most development avoid and buffer wetland resources. Policies require the maintenance and restoration of the biological productivity and quality of wetlands, as well as limit the filling of wetlands. The filling of wetlands is generally limited to high priority uses, and it must be avoided unless there “is no feasible less environmentally damaging alternative, and authorized fill must be fully mitigated.”

The Project site includes 1.64 acres of wetlands. However, Project construction would affect less than 1% (0.005 acres) due to Project implementation. Trail crossings are essential to constructing this portion of the California Coastal trail (and State Coastal Plan Policy 145 calls for establishing this trail) and there is no alternative for a trail route on the west side of Highway 1. The Project is accordingly a “high priority use.” Mitigation measures in this section include avoidance or mitigation of direct impacts to special-status plant and wildlife species, sensitive plant communities, federal- and state-protected wetlands, and also avoid and/or minimize the potential for indirect impacts on these resources primarily due to off-trail use by visitors. No known heritage or landmark

trees occur on the Project site and, in particular, within the areas of proposed ground disturbance associated with parking/staging areas and the trail alignments. No native trees are proposed to be removed in association with the parking or staging areas or in association with the proposed trail alignments.

The Project would have a relatively low impact associated with construction and operation of the proposed trails and associated staging/parking areas. With implementation of previously described mitigation measures in this section that avoid and/or minimize the potential for direct and indirect impacts on sensitive biological resources impacts, along with compliance with local policies or ordinances protecting these resources., potential Project conflicts with applicable policies and ordinances would not be considered a substantial effect, and, therefore, the impact would be less than significant.

- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? **No impact.***

There are no known Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state Habitat Conservation Plans that would pertain to the proposed Project area

V. Cultural Resources and Tribal Cultural Resources

1. Setting

The following summarizes the archaeological setting of the site described in detail in the Cultural Resources report contained Appendix D of this Initial Study.

Archaeological evidence indicates that human occupation of California began at least 11,000 years ago. At the time of European settlement, the study area was within territory controlled by the Kashia Pomo. This group lived in rich environments that allowed for dense populations with complex social structures. They settled in large, permanent villages about which were distributed seasonal camps and task-specific sites. Primary village sites were occupied throughout the year and other sites were visited in order to procure particular resources that were especially abundant or available only during certain seasons. Sites often were situated near sources of fresh water and in ecotones where plant life and animal life were diverse and abundant.

The closest ethnographic villages to the study areas are *dana'ga* and *kapa'cinal*. These villages are described as located “just south of the store at Stewarts Point” and “about two miles northwest of Fisk’s Mills and near the shoreline.

The Project area has been surveyed on numerous occasions in the past. The trail right-of-way was surveyed again in June 2019, and no archaeological resources were found. The study area is located on nearly level terrain, perennial freshwater sources are at least 250 meters away, and the geology is older than 11,700 years old. The geologic deposits within the study area predate human arrival and occupation of California. Therefore, it appears that there is a very low probability of identifying a buried prehistoric archaeological site within the study area.

Regulatory Setting

Tribal cultural resources are: 1) sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are listed, or determined to be eligible for listing in the California Register of Historical Resources (California Register), or local register of historical resources, as defined in PRC Section 5020.1(k); or, 2) a resource determined by the lead CEQA agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). For a cultural landscape to be considered a tribal cultural resource, it must be geographically defined in terms of the size and scope of the landscape (PRC Section 21074[b]). Also, an historical resource, as defined in PRC Section

21084.1, unique archaeological resource, as defined in PRC Section 21083.2(g), or non-unique archaeological resource, as defined in PRC Section 21083.2(h), may also be a tribal cultural resource.

2. Impacts

- a. *Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5? **Less than significant impact.***

No archaeological resources were found or are expected within the trail right-of-way. The 2018 preliminary trail plan showed the trail right-of-way passing through a historic structure (barn). The trail was subsequently realigned so that the current right-of-way avoids this historical resource.

- b. *Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? **Less than significant with mitigation incorporated.***

No archaeological resources were found or expected to be disturbed during Project construction. However, it is always possible that such resources could be uncovered during construction. The mitigation measures listed below would apply to this impact, and the impact would be reduced to a less-than-significant level.

Mitigation Measure CR-1: If buried archeological resources, such as chipped or ground stone, historic debris building foundations, or human bone, are inadvertently discovered during ground-disturbing activities, work would stop in that area and within 100 feet of the find until the Kashia Band of Pomo Indians is contacted about the finds. The Band will determine whether a qualified archaeologist should assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the Parks Department and other appropriate agencies, or whether an alternative approach is warranted for the finds.

Mitigation Monitoring and Reporting

The mitigations will be implemented throughout the construction phase. SCRIP will be responsible for monitoring construction to ensure compliance.

Impact Significance After Mitigation

The recommended mitigation measures ensure that any cultural resources, and/or paleontological resources found during Project construction will be treated, preserved, curated, and/or disposed of consistent with pertinent federal and State laws and regulations. Therefore, the impact would be reduced to a less-than-significant level.

- c. *Disturb any human remains, including those interred outside of dedicated cemeteries?* **Less than significant with mitigation incorporated.** .

There are no known human remains on the site. The mitigation measure below addresses the impact if currently unknown remains are discovered during Project construction.

Mitigation Measure CR-2: If human remains of Native American origin are discovered during Project construction, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) (PRC 5097). If any human remains are discovered or recognized in any location other than a dedicated cemetery, there will be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the county coroner has been informed and has determined that no investigation of the cause of death is required; and

If the remains are of Native American origin, the Kashia Band of Pomo Indians shall be contacted to determine the means of treating or disposing of the human remains and any associated grave goods as provided in PRC 5097.98.

Mitigation Monitoring and Reporting

The mitigations will be implemented throughout the construction phase. SCRIP will be responsible for monitoring construction to ensure compliance.

Impact Significance After Mitigation

The recommended mitigation measures ensure that any cultural resources, paleontological resources, and/or human remains found during Project construction will be treated, preserved, curated, and/or disposed of consistent with pertinent federal and State laws and regulations. Therefore, the impact would be reduced to a less-than-significant level.

- d(i) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the Caltrans Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?* **Less than significant.**

The Kashia Band of Pomo Indians is a partner in developing the Project. The Band is responsible for overseeing trail use to protect tribal cultural resources. As described previously, the Project has been designed to avoid tribal cultural resources. The Project will not interfere with the ability of the Kashia Band of Pomo Indians of Stewarts Point Rancheria to practice their cultural and ocean-side traditions. Per the adopted Grant of Public Trail Easement for the property, the Band has the right to have portions of the trail closed on the Keshia Reserve to honor Kashia funerals and ceremonial activities. The Grant established protocols for the Band to notify SCRIP prior to planned closures, and it establishes caps on the total number of days per year that portions of the trail can be closed to public access. The Band has reviewed the Project design and not requested any changes to the Project.

- d(ii). Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is 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. Less than significant with mitigation incorporated.

As noted previously, the Project has been designed to ensure the integrity of significant tribal resources on the site. Mitigation Measures CR-1.1 and CR-1.2 would mitigate any impact to currently unknown resources to a less-than-significant level.

VI. Energy

1. Setting

The Project site is open land with livestock grazing on the Stewarts Point Ranch site. There are also several barns and ranch buildings, but no energy is currently used to light or heat these structures.

Regulatory Setting

EPA Emission Standards for Non-Road Diesel Engines

The U.S. EPA sets nationwide emission standards for mobile sources, which include on-road (highway) motor vehicles such trucks, buses, and automobiles, and non-road (off-road) vehicles and equipment used in construction, agricultural, industrial, and mining activities (such as bulldozers and loaders). The U.S. EPA also sets nationwide fuel standards. California also has the ability to set motor vehicle emission standards and standards for fuel used in California, as long as they are the same or more stringent than the federal standards.

The U.S. EPA has established a number of emission standards for on- and non-road heavy-duty diesel engines used in trucks and other equipment. Heavy-duty diesel on-road vehicle standards and the non-road diesel engine standards are estimated to reduce PM and NOx emissions from diesel engines up to 95 percent in 2030.¹³ The U.S. EPA has also substantially reduced the amount of sulfur allowed in diesel fuels. The new standards reduced the amount of sulfur allowed by approximately 97 percent for highway diesel fuel and by 99 percent for off-highway diesel. Ultra-low sulfur diesel is currently required for use by all vehicles in the U.S. California has adopted the federal diesel engine and diesel fuel requirements.

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard (RPS) Program, with the goal of increasing the percentage of renewable energy in the State's electricity mix to 20 percent of retail sales by 2010. In 2008, Executive Order S-14-08 was signed into law requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030. SB 100, passed in 2018, requires 100 percent of electricity in California to be provided by 100 percent renewable and carbon-free sources by 2045.

2. **Impacts**

- a. *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation. **Less than significant impact.***

The Project involves constructing a trail and associated features such as stream crossings and fences as well as installation of recreation facilities including benches, a restroom, picnic tables, and signs. This will require the use of heavy equipment and vehicles that use petroleum fuels. No other energy sources would be affected by the Project. The short-term construction Project would involve operating a small number of pieces of equipment (cement trucks, dump trucks, small graders, small track excavators, loaders, and possibly a small-to-mid-sized hydraulic crane to lift bridges in place) over one 8-month construction period. Use of this equipment would not be constant as clearing vegetation would need to avoid bird nesting season and badger restrictions. The Project is small, involves few pieces of equipment that consume petrochemical energy, and energy use would occur over a short period.

Once operational, the Project would attract people who would access the site by motor vehicles. According to the traffic analysis done for this Initial Study, the Project would generate an average of 11 weekday trips per day and 18 weekend trips per day. This is a minor increase in trips (one single-family residence typically generates 10 trips per day) plus many of these trips would likely be going to other parks and seashore access sites if the proposed Project was not open for access.

For these reasons, it is concluded that the Project would have a negligible effect on the State's energy resources. Therefore, there is no evidence that the Project would result in wasteful, inefficient, or unnecessary use of energy that would result in significant environmental effects nor evidence that the Project would result in wasteful, inefficient, or unnecessary use of energy that would result in significant environmental effects. No mitigation is required.

- b. *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **Less than significant impact.***

As discussed above, the use of petrochemical energy to construct the trail and associated amenities would have a negligible effect on local and State energy resources, and would, therefore, be consistent with State

plans (e.g., California Long-Term Energy Efficiency Strategic Plan) and County plans to conserve energy and energy efficient construction practices.

As stated previously, the Project would use a negligible amount of energy to provide a long-term environmental and recreational benefit. The Project would be consistent with State and local plans aimed at developing the California Coastal Trail as well as plans aimed at reducing long-term energy use as well as other State and local plans aimed at providing protection for environmental resources. Therefore, the Project is not inconsistent with any plan for energy efficiency, and the impact is less than significant.

VII. Geology and Soils

This section summarizes the geotechnical investigation done by Questa Engineering that is included in Appendix E. The full report contains additional details on site geology, soils, and geotechnical constraints. The following discussion summarizes the main points pertinent to a CEQA impact assessment.

1. Setting

Seismicity

The Project site lies in the tectonically active Coast Ranges Geomorphic Province of Northern California. The geologic and geomorphic structure of the northwest trending ridges and valleys in the region, including the Sonoma Mountains and adjacent low-lying areas, are controlled by active tectonism along the boundary between the North American and Pacific Tectonic Plates, defined by the San Andreas Fault System. The nearest known active fault is the San Andreas Fault, with several mapped fault traces located approximately 1-mile northeast of the proposed Stewarts Point Ranch and Kashia Reserve sites. The northernmost 2,750 feet of the proposed Kashia Trail alignment is located within the mapped boundary of an Alquist-Priolo Earthquake Fault Zone for a local, subsidiary fault to the San Andreas Fault.

Regional Geology

This area is characterized by northwest trending mountain ranges and valleys oriented sub-parallel to faults of the San Andreas Fault System. The Project site is regionally dominated by the San Andreas Fault itself. Over at least the last 25 million years, cumulative offsets have transported some rocks west of the fault trace (those that compose the Project site) approximately 350 miles northwestward relative to those on the east side of the fault trace. The strata in the Project area contain clasts believed to derive from sources in the San Emigdio Mountains, part of the Transverse Ranges in Kern County, California.

Site Topography

The Project area is comprised of a gently sloping coastal terrace landward of a sea cliff ranging from thirty to one hundred feet above sea level. The coastal terrace area can be broadly classified as a grass-covered surface interspersed with knobs and ridges of bedrock. Only the southern section of the Kashia Trail (approximately 1,000 feet of trail alignment starting from the southern end of the trail) is wooded. The terrace is bounded on its inland side by coastal slope

terrain, which exhibits a moderately sloping topography cut by steep-sided southwest-trending canyons.

Site Geology

Large sections of the proposed Stewarts Point and Kashia Trail alignments are situated on a marine terrace deposit surface. The coastal terrace is a wave-eroded surface created between 80 to 120 thousand years ago. This surface was subsequently uplifted by crustal movements to its present elevation.

2. Impacts

- a. *Directly or indirectly cause potentially substantial adverse effects, including the risk of loss, injury, or death involving:*
 - i. *Rupture of 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. **Less than significant with mitigation incorporated.***

Surface fault rupture may occur along this subsidiary fault trace within the design life of the trail. The surface rupture of the subsidiary fault at this location could physically damage or destroy the proposed trail improvements by direct fault offset. However, it should be noted that this is a recreational trail and not a critical infrastructure element (major road, rail, utility pipeline) or facility (school, hospital, police or fire station, etc.). Even when properly designed using the latest seismic engineering design standards, the proposed trail improvements could potentially be damaged or destroyed by a large fault rupture event and place people at risk if they happen to be present at this location during a major earthquake and fault rupture event. However, the trails will include few improvements, and will be designed for bicycle and pedestrian (not vehicle) use, with modest trail use at any given time. Surface fault rupture is considered to be a potentially significant impact to site use or improvements on the northern portion of the Kashia Trail. This can be mitigated through compliance with mitigation measures listed below.

- ii. *Strong seismic ground shaking? **Less than significant with mitigation incorporated.***

Earthquakes that occur along or near one of the active earthquake faults in the region could impact the site due to the effects of strong seismic groundshaking. Peak ground accelerations at the Project site are estimated to be on the order of 83% that of gravity (g) with a 10 percent chance of exceedance in a 50-year period. Ground accelerations of this magnitude could result in significant damage to unreinforced structures or buildings. Current Building Codes, including the 2020 California Building Code (adopted by the County of Sonoma), require new structures to be designed to resist the effects of strong seismic ground shaking. Strong seismic ground shaking is considered to be less than significant with incorporation of the mitigation measures in this section.

iii. Seismic-related ground failure, including liquefaction? **Less than significant impact.**

Another effect of seismic activity is the potential for seismic-related ground failure, including liquefaction. During and following strong seismic groundshaking, low density silty sand and poorly graded sand deposits can undergo settlement. Liquefaction occurs when water saturated sand deposits lose strength due to a loss of pore pressure. Liquefaction settlement generally occurs gradually over the following days and weeks. Dynamic densification occurs when dry sand and silty sand deposits settle rapidly during strong seismic groundshaking.

Potentially liquefiable sands and silty sands were not found at the Project site during the geotechnical investigation. Potentially liquefiable sands are unlikely to be present in terrace deposits and unlikely to affect trails and bridge crossings as they span across stream deposits containing sands. Seismic-related ground failure, including liquefaction, is considered to be a less-than-significant impact.

iv. Landslides? **Less than significant with mitigation incorporated.**

The cliff face along the Kashia Trail is mapped by the California Division of Mines and Geology as either an unstable cliff zone or a cliff zone of very low stability. The thinly interbedded sandstone and shale bedrock (German Rancho formation) in the general vicinity of the proposed Bridge D-5 location strikes nearly parallel with the cliff face and dips steeply (approximately 50 degrees) towards the ocean and shoreline. This composition and orientation are conducive to rockslides and rockfall, potentially within the lifetime of the bridge structure. Pieces of bedrock can be cleanly separated from the rock mass along the bedding surface

by hand. The bedrock additionally exhibits two well-defined systematic joint sets that also contribute to its low stability. Large storm events, wave undercutting, earthquakes, fires and human activity all contribute to cliff instability.

The area immediately north of the originally proposed Bridge D-6 crossing is composed of 5 to 7 feet of marine terrace deposits overlying bedrock. The originally proposed trail alignment in this area is constrained on its inland side by an existing fence, and the cliff face on its ocean side. For approximately 15 feet extending north beyond the bridge abutment, the maximum width of traversable land is 6 feet (see Appendix E). Field observation of this section indicates that slides within the marine terrace deposit occur readily and regularly. The introduction of trails with moderate human traffic makes this area particularly susceptible to rapid erosion and shallow cliff failure.

An area approximately 45 feet southeast of the originally proposed Bridge D-6 crossing may also be susceptible to cliff instabilities. This section of trail is constrained to a width of approximately 20 feet by a northwest-southeast running fence line on the trail's northeast side and the cliff face on its southwest side.

Portions of the originally proposed Stewarts Point Trail alignment approaches the cliff face. At its narrowest, this section of trail is constrained to a width of approximately 15 feet by a fence to the east and the cliff face to the west. The cliff face along this section of trail was mapped by the California Division of Mines and Geology as a zone of low stability. The massive marine sandstone and conglomerate bedrock (Gualala formation, Stewarts Point member) that underlies the trail section is less susceptible to cliff instability than the bedrock observed at the general Bridge D-6 location. However, these cliffs are still considered to exhibit a relatively low stability.

Questa reviewed and analyzed historic aerial imagery of the Project sites from 1953 and 1965 to assess cliff erosion and retreat at the Bridge D-6 location and at potentially sensitive areas where the trail alignments approach the current cliff face. While it was found that measurable retreat has occurred in places along the cliff face, retreat at the Bridge 2 location and in these potentially sensitive areas has occurred at too small of a scale to be accurately measured using this technique. Despite 65 years of relatively little change, the cliffs are still highly susceptible to landslide events.

Both trails have been re-aligned so that they do not approach the cliff face and generally avoid unstable cliff slope areas. Bridge D-6 was also re-located further east near the Caltrans roadway right of way edge to also avoid instability issues. These sections are situated in areas with gentle slopes and on bedrock with shallow soils (Slope Stability Class A), areas of gentle slopes on terrace deposits or alluvium (Slope Stability Class B), and areas of moderate slopes on strong rocks (Slope Stability Class C). Class A areas are stable, and landsliding is unlikely. Class B areas are stable but may exhibit some local bank slumps along gullies and streams. Class C areas are relatively stable, where landslides are infrequent and unlikely except on the steepest slopes.

A fill slope for Highway 1 begins approximately 20 feet northeast of the originally proposed Bridge D-6 location. The slope runs parallel and upslope to the proposed crossing. A culvert constructed of corrugated metal pipe outlets from this fill slope, crossing underneath Highway 1 to feed the drainage that the proposed crossing spans. Review of historic aerial imagery at this location indicates that Highway 1 adopted much of its present alignment between 1953 and 1965. Fill slopes constructed during this time were often under-engineered and are susceptible to failure. The culvert appears to be highly corroded and in poor condition. Should the culvert deteriorate beyond functionality, unmanaged subsurface water conditions could destabilize the slope.

Landslides and slope instabilities are a **potentially significant impact** to site use or improvements. Implementation of the mitigation measures listed in this section will reduce or minimize potential impacts to geologic resources to less than significant with mitigation incorporated.

Mitigation Measure GS-1: Design and construct the Project in compliance with the Sonoma County Code, including the Building Ordinance (Chapter 7), Drainage and Storm Water Management Ordinance (Chapter 11), and Subdivision Ordinance (Chapter 25).

All construction activities shall meet the California Building Code regulations for seismic safety. Construction plans shall be subject to review and approval of Permit Sonoma prior to the issuance of a building permit. All work shall be subject to inspection by Permit Sonoma and must conform to all applicable code requirements and approved improvement plans prior to the issuance of a certificate of occupancy.

SCRIP shall apply for building permits from Permit Sonoma and further modify the trail alignment and develop trail and crossing design and stabilization plans to ensure that permits are granted and that the trail and crossing structures, including all existing culverts, are stable and hydraulically adequate. This will ensure County review of improvement plans; and that all structures such as bridges and boardwalks adhere to the Sonoma County Codes and applicable Building Ordinances, including grading, drainage, and seismic design criteria for planned structures.

Mitigation Measure GS-2: The Project design shall conform with the specifications and criteria contained in the Project Geotechnical Report. Geotechnical recommendations were prepared and presented in the North Coast Trails Preliminary Geotechnical Report prepared by Questa Engineering dated August 2018. The report provided recommendations for site preparation and grading, parking lots, and bridge foundations. The report also identified seismic design parameters in accordance with the 2020 California Building Code.

Proper foundation engineering and construction of any structures such as small bridge structures built as a result of implementation of the Project shall be performed in accordance with the geotechnical recommendations as well as preparation of plans prepared by a Registered Structural Engineer or Civil Engineer experienced in structural design. The structural engineering design shall incorporate seismic design parameters as outlined in the current California Building Code and Sonoma County Code.

Mitigation Monitoring and Reporting

All conditions will be included on construction plans. Conditions will be included in the Building Permit. Permit Sonoma will be responsible for monitoring compliance with the Building Permit.

Impact Significance After Mitigation

Constructing improvements per the recommendations of the Registered Civil and Structural Engineers will ensure that improvements can withstands projected seismic activity and properly address local slope and cliff instability issues. The impacts from seismic activity and geotechnical instability would, therefore, be reduced to a less than significant level.

b. *Result in substantial soil erosion or the loss of topsoil? Less than significant with mitigation incorporated.*

Areas of proposed trails traverse areas of gently sloping to rolling topography with terrace slopes typically less than 5%. Site soils have slight to moderate soil erosion hazards. Areas to be graded and altered during trail construction and restoration activities could be subjected to soil erosion by wind and water.

In accordance with the Clean Water Act and the State Water Resources Control Board (SWRCB) the applicant prepared a Draft Storm Water Pollution Prevention Plan (SWPPP); see Appendix A. A final SWPPP will be required prior to the start of construction. The SWPPP shall include specific best management practices to reduce soil erosion. This is required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit).

Additionally, the Project requires an Erosion Control Plan to be submitted to the County in conjunction with the Grading Permit Application. The Plan shall include winterization, dust, erosion and pollution control measures conforming to the ABAG Manual of Standards for Erosion and Sediment Control Measures, with sediment basin design calculations. The Erosion Control Plan shall describe the "best management practices" (BMPs) to be used during and after construction to control pollution resulting from both storm and construction water runoff. The Plan shall include locations of vehicle and equipment staging, portable restrooms, mobilization areas, and planned access routes.

As noted above, the Project design includes a Draft SWPPP for this Project. The SWPPP includes Best Management Practices (BMPs) for control of soil erosion including placement of straw wattles, silt fences, berms, and gravel construction entrance areas or other control to prevent tracking sediment off-site onto Highway 1.

Mitigation Measure GS-3: SCRP and the Construction Contractor shall finalize the Draft SWPPP and submit it and the Notice of Intent to the North Coast Regional Board and, if required by the State Water Resources Control Board, amend the SWPPP to obtain an approved Final SWPPP. The applicant shall implement all conditions set forth in the Final SWPPP. The Project SWPPP shall include a description of the "Best Management Practices" (BMPs) to be used to prevent the discharge of

other construction related NPDES pollutants beside sediment (i.e., paint, concrete, etc.) to downstream waters and the ocean. After construction is completed, all drainage facilities shall be inspected for accumulated sediment from the Project and these drainage structures shall be cleared of debris and sediment.

Mitigation Measure GS-4: SCRP shall complete an Erosion Control Plan to be submitted to PRMD in conjunction with the Building Permit Application. The Erosion Control Plan shall include winterization, dust control, erosion control and pollution control measures conforming to the Association of Bay Area Government (ABAG) Manual of Standards for Erosion and Sediment Control Measures and the California Stormwater Quality Association (CASQA) Stormwater Best Management Practice Handbook Portal: Construction. The Erosion Control Plan shall describe the “Best Management Practices” (BMPs) to be used during and following construction to control pollution resulting from both storm and construction water runoff. The Plan shall include locations of vehicle and equipment staging, portable restrooms, mobilization areas, and planned construction access routes.

Mitigation Monitoring and Reporting

The SWPPP and the Erosion Control Plan will be submitted prior to any construction work starting on the site. The Construction Contractor will be responsible for implementing the final permit conditions for both the SWPPP and the Erosion Control Plan. Permit Sonoma will be responsible for monitoring Project construction for compliance with the SWPPP.

Impact Significance After Mitigation

Constructing improvements per the conditions set forth in the Final SWPPP and Erosion Control Plan will ensure that erosion and release of any hazardous substances will be prevented or minimized. These permit conditions would reduce the impact to a less-than-significant level.

- c. *Would the project 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? Less than significant with mitigation incorporated.*

The North Coast Trails, Preliminary Geotechnical Report (Appendix E) identified several areas on landslide concern in locations where the

original trail design was located near or at the bluff edge. That report recommended relocation of the trail in these locations, including where two new bridges near the bluff edge were originally proposed. The current proposed trail plan implements the recommendations of that 2018 report, and the trail has been realigned to avoid the three identified areas of geologic concern. Potential instability-related impacts on trail and bridge construction would be reduced to a less-than-significant level by implementing the conditions set forth in the aforementioned Preliminary Geotechnical Report and in Mitigation Measures GS-1 and GS-2. These mitigation measures would reduce impacts related to geologic or soil instability to a less-than-significant level.

- d. *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? **Less than significant with mitigation incorporated.***

Expansive soils are those that shrink and swell in response to changes in moisture content. According to information contained in the USDA Sonoma County Soil Survey, site soil series have generally low to moderate shrink-swell potential. Seasonal expansion and contraction of site soils could damage site improvements such as foundations, concrete slabs, sidewalks, and pavements. Expansive soils can be mitigated by including design measures such as removal and replacement with non-expansive soils, segregating expansive soils from overlying improvements, lime-treating expansive soils to reduce the expansiveness, and increasing the thickness of non-expansive construction materials such as Class 2 Aggregate Base between the expansive soil and overlying concrete and hot mix asphalt improvements. The impact of expansive soils would be addressed, as necessary, during construction in accordance with recommendations set forth in the aforementioned Mitigation Measures GS-1 and GS-2.

- e. *Have soils incapable of adequately supporting the use of septic tanks or alternative water disposal systems where sewers are not available for the disposal of waste water? **No impact.***

There are no planned on-site wastewater disposal systems at the Project site. The planned restroom will be a pre-engineered pump-out vault structure. The impact of soils incapable of supporting septic tanks or alternative wastewater disposal systems is considered less than significant.

- f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? **Less than significant with mitigation incorporated.**

There are no records of paleontological finds on the Project site. However marine terraces are uplifted sea bottoms that may contain marine fossils. Destruction of such fossil would be a potentially significant impact

Mitigation Measure GS-5: If vertebrate fossils are discovered during construction, all work on the site shall stop immediately, Sonoma County Regional Park or the Agency's designee shall be notified, and a qualified professional paleontologist shall assess the nature and importance of the find and recommend appropriate treatment. Treatment may include, but is not limited to, preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection and may also include preparation of a report for publication describing the finds. The Project applicant shall be responsible for implementing the recommendations of the qualified paleontologist. A report of all findings shall be submitted to Sonoma County Regional Park or the Agency's designee.

Mitigation Monitoring and Reporting

The applicant will include this measure in the construction contract. SCRIP or its Designee shall monitor from compliance of the measure successful implementation.

Impact Significance After Mitigation

This standard mitigation measure would ensure protection and/or a report on their importance and thereby reduce the construction impacts to valuable paleontological resources to a less-than-significant level.

VIII. Greenhouse Gas Emissions

1. *Setting*

Climate change is caused by greenhouse gases (GHGs) emitted into the atmosphere around the world from a variety of sources, including the combustion of fuel for energy and transportation, cement manufacturing, and refrigerant emissions. GHGs are those gases that have the ability to trap heat in the atmosphere, a process that is analogous to the way a greenhouse traps heat. GHGs may be emitted as a result of human activities, as well as through natural processes. GHGs have been accumulating in the earth's atmosphere at a faster rate over the last 150 years than has occurred historically. Increasing GHG concentrations in the atmosphere are leading to global climate change.

Executive Order S-3-05 was established by Governor Arnold Schwarzenegger in June 2006 established the following statewide emission reduction targets through the year 2050:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels;
- By 2050, reduce GHG emissions to 80% below 1990 levels.

AB 32, also known as the California Global Warming Solutions Act of 2006 designates the California Air Resources Board (CARB) as the State agency charged with monitoring and regulating sources of emissions of GHGs. Under AB 32, the State board is required to approve a statewide GHG emissions limit equivalent to the statewide GHG emissions level in 1990 to be achieved by 2020 and to adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG emissions reductions. The law establishes periodic targets for reductions and requires certain facilities to report emissions of GHGs annually.

Sonoma County Climate Action 2020 and Beyond Regional Climate Action Plan

In 2016, Sonoma County adopted the Climate Action 2020 and Beyond Regional Climate Action Plan (CAP) which establishes the County GHG reduction goals below 1990 levels: 25% by 2020, 40% by 2030, and 80% by 2050, consistent with the state requirements. The CAP outlines the reduction efforts in six major GHG source areas, including building energy, transportation and land use, solid waste, water and wastewater, livestock and fertilizer, and advanced climate initiatives. Notably, based on projections from the 2010 GHG inventory, Sonoma County is not expected to meet the 2015 goal of 25% below 1990 levels. Furthermore, the

County's population is projected to increase by 5% between 2010 and 2020, and employment is projected to increase by 13% over the same period. The two main factors which influence the growth of GHG emissions in the County are from population and economic growth.

In addition, Appendix A of the County's CAP includes a consistency checklist in which projects can identify all applicable mandatory local or regional measures in the CAP in order to demonstrate consistency. Projects that implement all applicable mandatory CAP measures can conclude that their impacts related to GHG emissions would be less than significant under CEQA. However, since the CAP checklist is intended for residential, commercial, and mixed-use projects, the proposed Project is not a type of project addressed within the CAP. Thus, the County's CAP does not apply to the proposed Project

2. Impacts

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

The California Emissions Estimator Model (CalEEMod, Version 2016.3.2) was used to estimate GHG emissions from the 1-year construction phase and the operational phase on a few vehicles accessing the reserves for recreational use and a few trips by SCRIP staff or contractors to monitor the site and provide maintenance. Equipment and vehicles constructing the Project would generate the most emissions.

The estimated construction phase GHG emissions would generate a maximum annual total of 131 metric tons of GHG emission during the year of construction. The Northern Sonoma County Air District does not have an adopted air quality plan, or any other adopted policies related to GHG emissions. The Bay Area Air Quality Management District uses a significance threshold of 1,100 metric tons per year; emissions beyond this threshold are considered cumulatively significant. Project emissions would be well below this significance threshold.

After completion of the proposed trail and parking improvements, net new operational GHG emissions would come primarily from motor vehicles conducting park maintenance and trail users arriving by automobile. Emissions from these few vehicles would generate less emissions than the worst-case year. Both construction and operational GHG emissions are well below standard GHG significance thresholds that

would require a more detailed numerical analysis. The 2019 Draft EIR prepared for the County for the proposed Estero Trail Easement project found that construction emissions of that construction of that project as well as new trips (which are over twice that predicted for this Project) would generate 5.2 metric tons per year (amortized). This far below the 1,100 metric ton significance threshold. Accordingly, the impact is deemed less than significant.

- b. *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?* **Less than significant impact.**

As described in the previous analysis, the Project would generate insignificant GHG emissions compared to the emissions from other sources in California or the world. Once construction is complete, the Project would generate minimal vehicle-related emissions, approximate the same number of vehicle trips as a single-family household. In addition, many of these visitors would likely be driving to another park or preserve on the coast to meet their recreational needs if the Project was not constructed. Also, the Project implements State plans for a California Coastal Trail. Accordingly, it is concluded that the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.

IX. Hazards and Hazardous Materials

1. *Setting*

The site is used for livestock grazing and/or open space. No hazardous materials are currently used on the Project site.

Wildfire Hazards

The unincorporated Project site includes wildlands within the State Responsibility Area (SRA) served by CAL FIRE Based upon fire hazard mapping by the CAL FIRE Forest Resource Assessment Program, the Project area is located within an area identified as the high fire hazard zone. The area containing structures adjacent to the Stewarts Point Sore are classified as Very High Fire Hazard Severity zone.

Airports

The nearest airport to the Project site is the Sea Ranch Airport, a private airport for Sea Ranch residents and their guests. The airport is atop the ridge east of Highway 1 (360 feet elevation) and located at 36221 Timber Ridge Road, Sea Ranch. It is located approximately 4.5 miles northwest of the Stewarts Point Store.

Emergency Response

The North Sonoma Coast Fire Protection District serves the very northwestern corner of Sonoma County. We are a company of dedicated volunteer and career firefighters who provide fire protection, emergency medical response, rescue, and public assistance services to the communities of northwestern Sonoma County. CAL FIRE, under contract, provides emergency response, administrative, maintenance and training services to the Department. This contract is funded through real property taxes. CAL FIRE provides at least two (and often more) duty officers at all times and staffs the fire equipment located at the South Station on Annapolis Road. During fire season the South Station is enhanced by a seasonal crew of CAL FIRE wildland firefighters.

2. *Impacts*

- a. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? **Less than significant impact.***

During construction activities for the proposed Project, limited quantities of miscellaneous hazardous substances, such as gasoline, diesel fuel, hydraulic fluid, etc. would be used for operation of motorized equipment. Use of these types of substances would not occur in significant (that is, regulatory) amounts or frequencies to constitute a potential hazard to the public or environment. Once constructed, the Project would not require long-term operational use of hazardous materials. Potential impacts are restricted to the construction phase.

The applicant has prepared a Draft SWPPP to address how the contractor will avoid spills of hazardous materials. This Draft SWPPP will be replaced by a Final SWPPP after review and comment by reviewing agencies. The Project would be subject to the requirements of the North Coast Region Water Quality Control Board, which includes requirements for construction site control and water quality protection measures.

- b. *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? **Less than significant impact.***

The proposed Project would involve grading of a trail and associated facilities. The Project site has historically been used for livestock grazing. There is no record of storage of hazardous material on the site. Accordingly, site preparation is not expected to result in the accidental release of hazardous materials into the environment, and the potential impact would be less than significant.

- c. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? **No impact.***

The Project site is not within one-quarter mile of a school. Therefore, there would be no impact. The nearest school is the Kashia Elementary school that is located about 4.4 miles east of the Stewarts Point Store.

- 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? **No impact.***

The Project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 known as the Cortese List.

- 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, would the project result in a safety hazard or excessive noise for people residing or working in the project area? **No impact.***

The nearest airport is the private Sea Ranch Airport located about 4.5 miles to the northeast. Development of the Project site would not interfere with the airport land use plan. The airport is on top of the ridge. Development of a trail near sea level would have no impact on safety conditions at the airport or on the Project site.

- f. *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? **No impact.***

The Project would be located west of Highway 1. It would not create a new public street or otherwise block or impede emergency access or evacuation on Highway 1 or in the general Project area.

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

The Project area is susceptible to wildfire, witness the Meyers Fire of 2020 that burned down to the coast a few miles south of the Project site. However, it is unlikely there would be recreational use allowed at the trails system when a large wildfire is threatening the area. The risk to trail users would be minimal under normal fire weather conditions.

X. Hydrology and Water Quality

1. Setting

The Project area is located in Sonoma County in the North Coast Watershed, a slender watershed that extends along the Pacific Coast north to the Sonoma-Mendocino County line and south to the town of Jenner. The watershed is bound to the east by the coastal mountain range ridge which makes the shared boundary with the Gualala Watershed. The North Coast Watershed drains the western face of the coastal mountain ranges across a coastal terrace, down a sea cliff and into the Pacific Ocean. The coastal ranges are wooded with steep slopes while the terrace area is gently sloped, and grass covered. The coastal range elevation peaks around 900 feet at the watershed boundary and drops to about 100 feet at the start of the coastal terrace. The coastal terrace gently slopes towards the sea cliff, which sits 30 to 100 feet above sea level. The drainage has a uniform slope towards the coast, with few valleys or depressions. As a result, runoff primarily sheets directly towards the ocean, collecting in numerous, small, ephemeral streams.

The Project site is located on the coastal terrace region of the watershed, west of Highway 1. Runoff from the coastal ranges is controlled in culverts as it passes beneath Highway 1 and onto the coastal terrace. There is little development in the watershed besides Highway 1 and sparsely placed farm buildings. Most runoff travels over natural pervious surfaces and pastureland. The proposed Project will construct parking lots and trails paved with resin-stabilized aggregate. The proposed Project will create a nominal area of impervious surface and will have an insignificant impact on runoff

Precipitation

The closest rainfall record is recorded at Point Arena, which is approximately 28 miles north of Stewarts Point. Precipitation has been recorded at Point Arena from 1938 to 1988 and estimates an annual precipitation of 42 inches.

Surface Water

Surface water in the North Coast Watershed collects mainly in unnamed, ephemeral streams that are scattered along the watershed. In addition to blue line streams the gentle slope and soil of the terrace also produces small seasonal drainages and wetlands that do not appear on USGS maps. The Project area features a total of 14 drainages, which are numbered south to north. Of the 14 drainages, five (5) are blue line streams, and are discussed in further detail below. The non-blue line drainages have less

than 0.04 square miles of drainage area and are not significant contributors of water conveyance.

Ephemeral Streams

A total of five ephemeral streams are in the Project area, three of which will be crossed by the proposed trails. The plans for the Kashia Trail include two new crossings over streams 2 and 3. Stewarts trail includes one new crossing over wetlands and an existing bridge to cross Stream 4 and adjacent wetlands. No crossings are proposed over ephemeral streams 1 and 5.

There are a total of five (5) blue line streams in the Project area, which have been numbered 1 to 5, south to north, for reference. The streams have drainage sizes ranging between 0.2 and 0.6 square miles, are ephemeral, and have two-year flows ranging between eight (8) and fifty (50) cubic feet per second (StreamStats). Table 4 summarizes the characteristics of the streams.

Table 4: Blue Line Stream Summary

Stream Number	Trail	Length (km)	Drainage Area (sq mi)	2-Yr Flow (cfs)	Channel Description	OHW Channel Width (ft)
1	Kashia	1.01	0.2	17.5	narrow, deeply incised drainage	1-2
2	Kashia	2.38	0.6	47.5	Wide, evolved channel	9-10
3	Kashia	1.4	0.4	31.9	narrow, deeply incised drainage bed is comprised of rock.	1-2
4	Stewarts	1.05	0.24	15.3	slightly incised, defined bed and banks, gravel deposits on soft bottom	2-3
5	Stewarts	0.95	0.1	8.61	deeply incised	1-2

All of the streams have headwaters in the wooded slopes of the coastal range and drain into the Pacific. The stream profiles are steeper in the upper regions and level as they extend across the coastal terrace. Flows are confined as they pass through a culvert underneath Highway 1. With the exception of Stream 2, all streams are incised and show signs of Stage III-IV channel evolution. Stream 2 has a wide Ordinary High Water (OHW) channel width and shows geometry typical of Stage V or VI evolution.

The Project area is located in FEMA Flood Zone D. Area D indicates an area where flooding is possible but where no analysis has been conducted. Though the coastal terrace has a gradual slope towards the ocean, the Project area is prone to pooling in regional depressions and around seeps. From the characteristics of the blue-line streams discussed in the previous channel, it should be noted that most channels are incising and have banks higher than their bankfull depth.

Bridges currently exist on Streams 2 and 3 on the Kashia Trail. The bridge on Stream 2 will be replaced by a new bridge crossing further upstream and the trail on Stream 3 has been moved east and will cross at an existing culvert. A new puncheon crossing is proposed on Stream 4, and additional drainage crossings are proposed over wetland areas. All bridge designs are preliminary and have not been finalized for any of the crossings but will be designed to minimize erosion and impedance to flood flow. All new structures will be built to county flood standards and have a freeboard 1-foot above the determined 100-year flood elevation.

Groundwater

Groundwater is not abundantly present in the Project area, nor is it identified by any agency. Sonoma County has classified the groundwater in the region as Low/Highly Variable Water Yield Area. Additionally, USGS has not identified any aquifers or wells in the area.

Regulatory Framework

Overview

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality in California. Regulations set forth by the U.S. EPA and the State Water Resources Control Board (SWRCB) have been developed to fulfill the requirements of this legislation. EPA regulations include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the RWQCBs. The Project site is within the jurisdiction of North Coast RWQCB.

Clean Water Act

The Clean Water Act (CWA) regulates the discharge of pollutants into the waters of the U.S. and the quality standards for surface waters which includes lakes, rivers, streams, wetlands, and coastal areas. The CWA made it unlawful to discharge any pollutant into navigable waters (as defined by the U.S. Army Corps of Engineers)

Construction General Permit Order 2009-0009-DWQ

Dischargers are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009- DWQ if their projects disturb one or more acres of soil or disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres.

Sonoma County General Plan 2020

The goals and policies listed in the following text summarize the priorities of the Sonoma County General Plan Water Resources Element (Sonoma County 2008) related to hydrology and water quality.

Goal WR-1: Protect, restore and enhance the quality of surface and groundwater resources to meet the needs of all reasonable beneficial uses.

Objective WR-1.2: Work with the RWQCB and interested parties in the development and implementation of RWQCB requirements.

Objective WR-1.2: Avoid pollution of stormwater, water bodies and groundwater.

Policy WR-1c: Prioritize stormwater management measures in coordination with the RWQCB direction, focusing first upon watershed areas that are urbanizing and watersheds with impaired water bodies. Work cooperatively with the RWQCBs to manage the quality and quantity of stormwater runoff from new development and redevelopment in order to:

- (1) Prevent, to the maximum extent practicable, pollutants from reaching stormwater conveyance systems.
- (2) Ensure, to the maximum extent practicable, that discharges from regulated municipal storm drains comply with water quality objectives
- (3) Limit, to the maximum extent practicable, stormwater from post development sites to pre-development quantities.
- (4) Conserve and protect natural areas to the maximum extent practicable

Proposed Project Improvements

Table 5 summarizes proposed Project improvements related to existing drainages and ephemeral streams. The locations of these improvements are shown on Figures 3 and 4 in the Project Description section of this report.

Table 5: Project Improvements at Existing Drainages

Table 5A: Stewarts Point Trail: Features Crossing CCC Wetlands							
Water Feature	Crossing or Culvert Label	Feature Description	Length (FT) of New Feature	Width (FT) of New Feature	Area of Piers and Piles (SF) for New Feature	Total Temporary Impacts (SF)	Total Permanent Impacts (SF)
CCC-W-26	NA	Trail Segment	10	3	0	30	0
ESHA Drainage/Wetland	NA	Trail Segment	12	6	0	72	0
USACE-W-17	NA	Trail Segment	6	3	0	18	0
USACE-16	SD-1	Minor Drainage Lens	10	7	0	200	70
USACE-16	SD-2	Minor Drainage Lens	14	7	0	280	98
USACE-16	SD-3	Minor Drainage Lens	10	7	0	200	70
CCC-W-12	NA	Trail Segment	8	3	0	24	0
CCC-W-14	NA	Trail Segment	10	3	0	30	0
CCC-W-11	SD-4	Minor Drainage Lens	10	7	0	200	70
USACE-16	SD-5	Minor Drainage Lens	12	7	0	240	84
CCC-W-10 AND D-12	SD-6	Minor Drainage Lens	10	7	0	200	70
USACE-15	SD-7	Minor Drainage Lens	10	7	0	200	70
USACE-W-13 AND D-11	SD-8	Minor Drainage Lens	10	7	0	200	70
USACE-W-11 AND D-10	SD-9	Armored Crossing	18	8	0	360	144
USACE-W-10 AND D-9	SD-10	Clearspan Bridge	40	6	10	800	10
USACE-W-9	NA	Trail Segment	20	3	0	60	0
		Total Stewarts Point Trail Impacts				3114	756

Table 5 Note: Some of the lengths and widths of the crossings on Table 5 differ slightly from those on the trail plans because the Table 5 footprints represent the base of the crossings including the added rocks while the trail plan crossing footprints represent the surface of the crossings.

- a. *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? Less than significant impact*

The Project Engineers (Questa) have concluded that Project construction would not violate any water quality standards or waste discharge

Table 5B: Kashia Trail: Features Crossing CCC Wetlands							
Water Feature	Crossing or Culvert Label	Feature	Length (FT) of New Feature	Width (FT) of New Feature	Area of Piers and Piles (SF) for New Feature	Total Temporary Wetlands Impacts (SF)	Total Permanent Wetlands Impacts (SF)
USACE-W-6	KD-11	Minor Drainage Lens	25	7	0	500	175
D-8	KD-10	Puncheon Bridge	8	5	0	0	0
USACE-W-5 AND D-7	KD-12	Minor Drainage Lens	20	7	0	400	140
D-6	EX-1	Existing Culvert	0	0	0	0	0
CCC-W-2	KD-14	Minor Drainage Lens	100	7	0	2000	700
D-5 Wetland Fringe	KD-15	Clearspan Bridge	30	5	10	600	10
D-4	KD-16	Puncheon Bridge	12	5	0	240	60
D-3	EX-2	Existing Culvert	0	0	0	0	0
D-2	KD-18	Puncheon Bridge	8	5	0	160	40
D-1	EX-3	Existing Culvert	0	0	0	0	0
		Total Kashia Trail Impacts				3900	1125

requirements however, project construction could result in temporary impacts to water quality. Best Management Practices have been incorporated into the Project design to protect water quality. This less-than-significant impact can be reduced with implementation of the

following standard construction conditions of approval to reduce potential construction impacts from erosion, sedimentation, and other potential water quality impacts to all waters, including jurisdictional wetlands and riparian areas.

Mitigation Measure HYD-1: Regional Parks will schedule ground-disturbing activities including vegetation removal, excavation, grading, and compaction, to the dry season, May 15 – October 31. Regional Parks will schedule ground-disturbing activities below top-of-bank of the unnamed blue-line stream channel between June 15 and October 14. Regional Parks must approve ground-disturbing activities that must occur during the rainy season (November 01 – May 15) based on an approved Storm Water Pollution Prevention Plan (if required).

Mitigation Measure HYD-2: Regional Parks will delineate the limits of construction activity within or near wetlands, the unnamed blue-line stream channel, and riparian habitat prior to the onset of ground-disturbing activities. Work limit delineation will be temporary, high-visibility construction fencing to protect environmentally sensitive areas and prevent construction work and equipment from unnecessarily extending the work area. Regional Parks will include the temporary fencing locations on the construction drawings and will require it be removed after construction activities are completed.

Mitigation Measure HYD-3: The Contractor will disturb only the minimum amount of riparian vegetation possible within the construction area. Within temporary disturbance areas, the Contractor will cut riparian vegetation at or above grade to facilitate natural regrowth.

Mitigation Measure HYD-4: The Contractor will comply with regulations of the U.S. Army Corps of Engineers, the California Department of Fish and Wildlife, the North Coast Regional Water Quality Control Board and the State Coastal Commission regarding construction activities that affect drainages and wetlands.

Mitigation Measure HYD-5: The Contractor will dispose of surplus soils, surplus concrete rubble, or pavement at an acceptable and legally permitted disposal site or taken to a permitted soil concrete and/or asphalt recycling facility.

Mitigation Measure HYD-6: The Contractor will implement Best Management Practices to protect geology and soils, including the following:

1. Avoid construction activities during rainy days as directed by Regional Parks.
2. Preserve existing vegetation except what is designated by Regional Parks for removal.
3. Leave root structure of vegetation in place whenever feasible.
4. Minimize the extent of disturbance from construction activities.
5. Stabilize exposed slopes, banks and stockpiles of soil materials during construction using Erosion control blankets, or other method approved by Regional Parks.
6. Stabilize exposed soil by installing erosion control materials such as blankets, mulch, and/or Seed that are free of exotic species or other method approved by Regional Parks.

Mitigation Measure HYD-7: The Contractor will be required to prepare, submit, and implement a spill prevention plan for the Project, which shall include, but not be limited to, the following elements:

1. Follow the provisions of Sections 5163 – 5167 of the General Industry Safety Orders (CCR Title 8) to protect the project site from being contaminated by the accidental release of any Hazardous materials and/or waste.
2. Store all flammable liquids in compliance with the Sonoma County Fire Code and section 7- 1.01G of the Caltrans Standard Specification (or the functional equivalent) for the protection of surface waters.
3. If hazardous materials are encountered during construction, the contractor will immediately halt construction activities and will implement actions required by the current California Regulatory requirements.
4. In the event of a spill of hazardous materials the Contractor will immediately call the emergency number 9-1-1 to report the spill; and will take appropriate actions to contain the spill to prevent further migration of the hazardous materials to storm water drains or surface Waters.
5. Prevent the following activities within areas protected by construction barrier fencing:
 - i. Fueling of any vehicles or portable generators
 - ii. Vehicle/equipment washing and maintenance areas

- iii. Above-ground tanks for liquid storage
 - iv. Industrial waste management areas (landfills, waste piles, treatment plants, disposal areas)
6. The Contractor will use drip pans or absorbent pads during vehicle and equipment maintenance, cleaning, fueling, and storage.
 7. Spill kits and cleanup materials shall be available at all locations of pile-driving activities.
 8. Equipment that is to be used shall be kept leak free and inspected for leaks and spills on a daily basis.
 9. Equipment will be parked over drip pans or absorbent pads.
 10. When not in use, the contractor will store pile-driving equipment away from concentrated flows of storm water, drainage courses, and inlets.
 11. Protect hammers and other hydraulic attachments by placing them on plywood and covering them with plastic or a comparable material prior to the onset of rain.

Mitigation Measure HYD-8: The Contractor will dispose of petroleum-based products in accordance with applicable laws and regulations.

Mitigation Measure HYD-9: Regional Parks Department operations and maintenance crews will dispose of petroleum-based products in accordance with applicable laws and regulations.

Mitigation Measure HYD-10: The Contractor will conduct inspections and maintenance, according to current regulations, of portable toilet facilities used during construction. The contractor will conduct routine waste removal to ensure that effluent spills are avoided or minimized.

Mitigation Measure HYD-11: Regional Parks or the Contractor will prepare a Storm Water Pollution Prevention Plan (SWPPP) for implementation during project construction, if required. The SWPPP will include a sediment control plan to identify measures to prevent sediment from entering delineated wetlands, the unnamed tributary, and any other surface drainage within the project area. The sediment control plan will address temporary, construction-related sediment control that may include but not be limited to silt fencing, sediment traps, fiber rolls, and/or barriers. The SWPPP will be prepared by a certified Qualified SWPPP Developer and will be monitored by a Qualified SWPPP Practitioner.

Mitigation Measure HYD-12: The Contractor will be required to install a protective impermeable barrier, such as a tarp, between the bridge work area and any surface water.

Mitigation Monitoring and Reporting

The mitigation measures listed above will be implemented per the timing listed for each measure by SCRCP, the Construction Contractor, or a designee approved by SCRCP. SCRCP will monitor for successful implementation of all measures prior to opening the trails for public use.

Impact Significance After Mitigation

These mitigation measures will ensure that trail construction is done to minimize erosion and consequent water quality impacts and impacts to water quality from construction in wetlands. These measures will reduce potential drainage and water quality impacts to a less-than-significant level. In addition, as stated before, these mitigations will be reviewed by other regulatory agencies prior to said agencies issuing permits and authorization need by SCRCP in order to construct the Project. It is possible that final permits and authorizations will revise these mitigations or add additional requirements for protecting water quality.

- b. *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?* **No impact.**

The proposed Project will not deplete groundwater supplies or interfere with groundwater recharge. Impervious surface area created by the Project is well less than 10% of the Project area. The Project area is not within a groundwater recharge area or major groundwater basin, and no water supply wells or domestic water supply will be provided (i.e., no trailhead restroom or drinking fountain). Therefore, the proposed Project is not expected to deplete groundwater supplies or interfere substantially with groundwater recharge.

- c. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
- (i) *result in substantial erosion or siltation on- or off-site;* **Less than significant with mitigation incorporated.** Project construction would cause potential erosion. However, erosion impacts would

be reduced to a less-than-significant level by implementing the previously required mitigation measures as well as Mitigation Measures G-3 and G-4.

- (ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; **Less than significant impact.***
- (iii) *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; **Less than significant impact.***
- (iv) *impede or redirect flood flows? **Less than significant impact.***

The proposed Project is not expected to alter the course of existing site drainage patterns and will not alter the course of surface waters, including wetlands and the unnamed stream. Once constructed, the increase in runoff from the trail system and ancillary improvements would be insubstantial, and not large enough to cause site flooding or redirect sheet flows across the site. Boardwalk structures will span the drainage with landings outside of the channel margin. Boardwalk sections will also span wetlands with piers placed in upland areas and not in State of California or in federal jurisdictional wetlands; therefore, wetlands would not be adversely affected.

The proposed Project will not alter drainage patterns or substantially increase the rate or amount of run-off in the Project area. The proposed trail improvements are not expected to contribute to existing flooding patterns or occurrences. The proposed Project is not expected to result in a substantial increase in surface runoff, or block or re-direct flood flows, either on-site or off-site. Mitigation measures recommended in the Geology and the Hydrology Sections of this report will reduce impact to hydrology and water quality to a less-than-significant level.

- d. *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? **No impact.***

The site is not within a mapped flood hazard, seiche, or tsunami zone

- e. *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? **No impact.***

The project area is not a part of a Water Quality Control Plan (other than the Regional Board's Basin Plan) nor is it in a Groundwater Management Plan area.

XI. Land Use and Planning

1. Setting

The proposed Project is located on the west side of Highway 1 between Stewarts Point and Salt Point State Park. The 105-acre Stewarts Point Ranch Reserve is designated as Land Extensive Agriculture (LEA) in the County General Plan. This reserve is zoned Land Extensive Agriculture (LEA) Coastal Zone (CC), Scenic Resources Combining District (SR), Riparian Corridor Combining District (RC) establishing agricultural use setbacks for riparian corridors, and B6 Combining District establishing limits on residential density. The LEA CC designation zoning is applied to lands best suited for permanent agriculture of relatively low production per acre of land to implement the General Plan Agricultural Resources Element policies and the resource policies of the Local Coastal Plan.

The 52-acre Kashia Coastal Reserve has a general plan designation of Resources and Rural Development (RRD). It is zoned Rural and Resources Development (RRD) Coastal Zone (CC), B6 Combining District, Floodplain Combining District (F2), Geologic Hazards Combining District (G), RC combining District, and SR Combining District. The RRD CC zoning is to implement the provisions of the resources and rural development land use category of the General Plan, namely to provide protection of lands needed for commercial timber production, geothermal production, aggregate resources production; lands needed for protection of watershed, fish and wildlife habitat, biotic resources, and for agricultural production activities that are not subject to all of the policies contained in the agricultural resources element of the General Plan. The resources and rural development district is also intended to allow very low density residential development and recreational and visitor-serving uses where compatible with resource use and available public services.

2. Impacts

a. Physically divide an established community? **No impact.**

The Project would not include any construction within or near an established community, and therefore would not physically divide or interfere with any established community. No impact would occur.

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

The County General Plan and LCP contains numerous policies, programs, and recommendations to preserve the biological, aesthetic, recreational, and other resources of the coastal zone. Pertinent policies and programs are described in the other resource sections of this Initial Study. Those analyses concluded that all impacts to coastal aesthetic, biological, cultural, noise, traffic, and other environmental resources could be reduced to a less-than-significant level with Project modification to include the mitigation measures recommended in this report.

The Project is consistent with the LCP Section V-48 and 49 of the LCP General Recommendations 20, 22, 23, 26 and 30, calling for development of trails recommended in the Access Plan (as noted above). Furthermore, the Project is also consistent with Section V-51, recommendation 56 encouraging a coastal trail along the beach, the coastal terrace, the uplands, the ridge roads, or the highway to connect public and private recreation areas and access trails with communities and commercial services. Finally, the trails are consistent with LCP Section III-12 recommendation 9, that states trails and access may be permitted if studies determine no long long-term adverse impacts would result from their construction, maintenance, and public use; and recommendation 17, that states pedestrian to eliminate adverse impacts on biological resources.

The Project is also consistent with the Sonoma County Coastal Zoning Code (Section 26C- 91(a)) that allows park and recreational facilities subject to approval of a Use Permit, provided that the Project can be found consistent with the LCP. As stated in the aforementioned finding, the Project is consistent with the LCP.

The proposed Project meets all of the required standards contained within Attachment "M" of the LCP Administrative Manual that states that access paths are allowed with buffer areas.

Given Project consistency with pertinent adopted plans to protect important environmental resources as well as policies to meet the State's goals of providing a California Coastal Trail, the Project would not cause a significant adverse environmental impact report resulting from an inconsistency with adopted plans, policies, or recommendations. All those possible environmental impacts have been assessed in other resource discussions in this Initial Study and all those impacts were found to be less than significant with incorporation of recommended mitigations.

XII. Mineral Resources

1. Setting

The Project area is not within an aggregate resource area. According to the USGS Mineral Resources Data System, there are no known mineral occurrences, prospects, or past or present mineral producers within or immediately adjacent to the Project area.¹

2. Impacts

- 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? **No impact.***

As noted above, no known mineral resources of importance to the state or region are located on site. Therefore, the proposed Project would not result in the loss of availability of mineral resources, or otherwise interfere with the extraction of existing mineral resources. No impact would occur.

- 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? **No impact.***

No locally important mineral resource recovery sites are delineated for the Project area, including in a general plan or other land use plan.

¹ U.S. Geologic Survey, *Mineral Resources Data System (MRDS), Mineral Resources On-Line Spatial Data*, available <http://mrddata.usgs.gov/mineral-resources/mrds-us.html>. Accessed 4/10/2017.

XIII. Noise

1. Setting

The Project site is located on lands currently or formerly used for livestock grazing. Existing noise audible on the site is from motor vehicles passing the site on Highway 1.

The Noise Element of the Sonoma County General Plan establishes goals, objectives and policies including performance standards to regulate noise affecting residential and other sensitive receptors. The General Plan sets separate standards for transportation noise and for noise from non-transportation land uses.

The nearest sensitive receptor (residences) to the Project trails are: one residence located adjacent to the southern end of the trail on the Stewarts Point Ranch; one residence north of Stewarts Point Ranch approximately 350 feet from the nearest trails section and over 1,000 feet from the northern parking lot; one residence west of the Stewarts Point Store; two residences east of Highway 1 are approximately 850 feet and 350 feet, respectively, from the nearest Stewarts Point Ranch trail segment and over 2,000 feet from the proposed parking area; and one residence east of Highway 1 that is within approximately 350 feet of the nearest trail segment on the Kashia Coastal Reserve.

2. Impacts

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

Construction of the Project will generate noise due to the use of heavy construction equipment. Equipment will include cement trucks, dump trucks, small graders, small track excavators, loaders, and possibly a small-to-mid-sized hydraulic crane to lift bridges in place. This equipment will be operating at different locations along the trail over a six-month construction period. Grading would occur after the close of the bird nesting period (i.e., later summer-early fall). Project construction will take approximately 3 to 4 months to complete after the limited earth-moving tasks are initiated. After construction of Project facilities is complete, the areas disturbed by construction activities will be restored to their pre-construction condition.

Typically, heavy construction equipment will generate a maximum noise level of up to 85 decibels (dB). The hourly noise levels would be expected to be lower since construction equipment operates in alternating cycles of full power and low power. Construction noise in a well-defined area typically attenuates at approximately 6 dB per doubling of distance, consistent with the rules applied for a point source with hard site conditions.

Assuming a .5 dB decrease per doubling of distance from the noise source, the six residences in the area receptor (350-800 feet distant) would be exposed to a maximum noise level of 65-70 dBA from Project construction. This maximum noise level would occur only when the heavy equipment was grading or doing other site preparation at the trail segment nearest the residence. As site work proceeded north or south of this nearest location, noise levels would decrease. Also, actual noise levels would likely be less than predicted here due to intervening vegetation and topography. Once construction is completed, Project operations would not generate significant noise. While these short-term noise impacts would be typical of any construction project, they could be annoying to residents of the six homes.

Mitigation Measure N-1: The applicant will reduce construction noise by implementing the following controls:

- (1) The Contractor will operate all internal combustion engines with mufflers that meet the requirements of the State Resources Code, and, where applicable, the Vehicle Code.
- (2) The Contractor will restrict construction activities to the hours of 7:00 a.m. to 7:00 p.m. except for actions taken to prevent or resolve an emergency.
- (3) SCRCP will operate all internal combustion engines with mufflers that meet the requirements of the State Resources Code, and, where applicable, the Vehicle Code.

Mitigation Monitoring and Reporting

These conditions will be included on the Construction Contract and implemented by the Contractor. SCRCP will monitor for compliance throughout the construction phase.

Impact Significance After Mitigation

These standard noise controls would reduce the temporary noise impacts to a less-than-significant level.

- b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?* **Less than significant impact.**

The Project includes construction activities that may locally generate ground borne vibration and noise. These levels would not be significant because they would be short-term and temporary and would be limited to daytime hours. There are no other activities or uses associated with the Project that would expose persons to or generate excessive ground borne vibration or ground borne noise levels. The Project will not result in permanent, long-term exposure of people to excessive ground borne vibration or noise levels. Construction activities associated with installing the foundation for the bridge and boardwalk sections will result in short-term noise from ground borne vibration that could be noticeable near the noise source, however there are few receptors in the Project vicinity. This less than significant impact can further be reduced with implementation of Mitigation Measure N-1.

- 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 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?* **No impact.**

The Project is over four miles from the nearest airport and people using the Project would not be affected by planes accessing that airport.

XIV. Population and Housing

1. Setting

There are no residences or public roads on the Project site.

2. Impacts

- a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?* **No impact.**

The proposed Project would not involve or result in major new housing, business, or industrial developments that could drive population growth. The proposed Project would involve constructing and operating a trail system providing increased recreational opportunities to the existing local and regional population.

- b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?* **No impact.**

The proposed Project would involve construction and operation of a trail system. It would not result in the demolition of existing housing, or otherwise cause a reduction in housing units on site or elsewhere. Therefore, no impact would occur.

XV. Public Services

1. Setting

The Project site is current or former grazing lands located between SR 1 and the ocean bank. The undeveloped land and few agricultural buildings do not require public services or utilities.

The closest response to a fire or medical emergency is by the North Sonoma Coast Fire Protection District that serves the very northwestern corner of Sonoma County. Volunteers with this district provide fire protection, emergency medical response, rescue, and public assistance services to the communities of northwestern Sonoma County. The District has three stations, the nearest to the Project site being the South Station on the Sea Ranch (960 Annapolis Road).

CAL FIRE, under contract, provides emergency response, administrative, maintenance and training services to the Department. This contract is funded through real property taxes. CAL FIRE provides at least two (and often more) duty officers at all times and staffs the fire equipment located at the South Station on Annapolis Road. During fire season the South Station is enhanced by a seasonal crew of CAL FIRE wildland firefighters

Police protection services are provided by the Sonoma County Sheriff's Office. The nearest substation is the Russian River Substation in Guerneville. This substation serves the west county including the entire coastline within the county.

2. Impacts

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

*Fire protection? **Less than significant impact.***

The Project will not include flammable structures. No campfires, barbecues, smoking, or other ignition sources would be permitted. Trail use would not be expected to ignite fires on the site. In addition, the site does not contain hazardous fuels that would be expected to grow to a large size prior to response from the Sea Ranch South Station. In any

case, the potential for fire response to the Project would not be sufficient to require new fire protection facilities.

The North Sonoma Coast Fire Protection District would be the first providers for emergency medical calls

Police protection? **Less than significant impact.**

SCRP Rangers would patrol the Project to ensure adherence with the use requirements of the two properties. There would be the potential for trail users to trespass onto portions of the properties outside the trail corridor or to other private properties in the area. At the Community Meeting held on the proposed Project, community members expressed concern about trespassing and other user disregard of trail use regulations. The Project includes signage that will tell users to not trespass of the trail. The mitigation measure recommended below further addresses this potential impact.

Response to crimes would be the responsibility of the Sheriff's Office. It is expected that such crimes would be rare. While the additional recreational facilities may increase police response to the site, such response would be within the existing capabilities of the Sheriff's Office. No new facilities would be needed to serve the Project nor maintain existing police response capabilities for the coastal area.

Mitigation Measure PS-1: SCRCP will monitor and record reports of trespass and other incidents involving unauthorized use of the trails. If such incidents are considered above normal, SCRCP will consider the following: increase its patrols; add additional signage; and/or develop a volunteer program to educate users and monitor use.

Mitigation Monitoring and Reporting

SCRCP will log incidents seen by staff and reports received from other agencies and members of the public and review the log on an annual basis. If warranted, SCRCP will consider the recommended additional actions and continue monitoring until incidents are deemed typical for its parks.

Impact Significance After Mitigation

The mitigation plus already-proposed signage and patrolling would be expected to reduce trespass and other nuisance actions to a less-than-significant level.

Schools, Parks, and Other Public Facilities? **No impact.**

The proposed Project would involve construction of a trail system and associated recreation-serving facilities. No operational activities beyond routine patrolling and maintenance of facilities would be required. The proposed projects would not require the need for new schools, other new parks, or need for other public facilities, such that new or physically altered public facilities would be needed.

XVI. Recreation

1. *Setting*

There are no parks or recreational facilities on the Project site. The site adjoins the north end of Salt Point State Park,

2. *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? **Less than significant impact.***

The proposed Project would create new recreational facilities. In time, the southern trail section may be linked to trails on Salt Point State Park and provide another connection in the California Coastal Trail. Eventually, the two Project trails may be linked as well as links further north to extend the California Coastal Trail. Future use of Project trails as well as links to other trails would not be expected to increase use of the existing trails to a level causing substantial deterioration. Ongoing use of these trails would require normal maintenance by State Parks' or SCRPs' staffs.

- 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? **Less than significant with mitigation incorporated.***

The Project is a new recreational facility. This Initial Study assesses the impacts of constructing and operating these facilities. These impacts can be reduced to a less-than-significant level by incorporating the mitigation measures listed in this Initial Study.

XVII. Transportation

1. Setting

The Project is located for a length of about two miles on the west side of Highway 1. There is no existing public road access to or through the site from Highway 1.

2. Impacts

- a. *Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? **Less than significant impact.***

The traffic report (included in Appendix) prepared when the Project was being designed projected that the Project would generate an average 11 trips on a weekday and 18 trips on a weekend day. This is similar to the number of trips generated by a single-family residence. This small increase in traffic would not be expected to conflict with Caltrans plans or operation on State Route 1. The Project would not result in new pedestrian or bicycle facility along Highway 1.

- b. *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? **Less than significant impact.***

Project would generate an average of 11 weekday trips and 18 weekend trips per day once the trails become operational. OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* (September 2017) states that projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. The number of new trips generated by the Project would be well below the screening criterion for such projects. Therefore, the Vehicle Miles Travelled (VMT) impact would be less than significant.

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

The proposed trailhead parking areas would be accessed via two driveways along SR 1. The northern parking lot which would include 9 parking spaces would be located a half-mile north of the SR 1/Stewarts Point-Skaggs Point Road intersection. The southern parking lot which would include 8 parking spaces would be located approximately three

miles south of the same intersection. The existing driveway to the northern lot currently serves a residence including a locked gate. The driveway is approximately 12-14 feet in width between fence lines with landscaping along the driveway side of the fence. The southern lot would include constructing a parking area inside the existing fence that is within the trail easement with a one-way circulation scheme from the entrance at the north end to the exit at the south end. The parking lot would include landscaping between the parking and the SR 1 travelway.

Sight lines along SR 1 at the location of the northern driveway extend approximately 700 feet north, up to the horizontal curve that is on a downward slope approaching the driveway. Sight lines to the south are also clear for 750 feet, which is adequate for speeds over 65 mph. Approaching vehicles traveling on SR 1 have clear sight lines to the driveway and of anyone exiting it.

Sight lines for the originally proposed southern parking area were found to be inadequate. The traffic report recommended relocating the parking area 430 feet to the north. The Project design has been subsequently revised to relocate the parking area as recommended.

The existing driveway to the northern lot currently serves a residence including a locked gate. The driveway is approximately 12-14 feet in width between fence lines with landscaping along the driveway side of the fence. Because there is inadequate width for two vehicles to pass on the existing residential driveway between SR 1 and the parking lot, it should be widened to at least 16 feet of clear pathway. Also, with the addition of traffic whose drivers may not be familiar with this section of SR 1, a Stop sign should be installed at the intersection of SR 1 and the access driveway.

The proposed parking area at the southern end of the trail would have a designated entrance and exit. To ensure visitors do not pull into and out of the parking area at any point between the two driveways, the lot has been designed with fencing and landscaping separating the parking lot from the SR1 travelway.

Mitigation Measure T-1: At the northern parking lot, the existing driveway section between SR 1 and the locked gate, will be widened to provide at least 16 feet of paved width without obstruction from landscaping. An R-1 Stop sign should be installed at the existing driveway

intersection approaching SR 1. The sign should not obstruct sight lines and the size should be at the discretion of Caltrans.

At the southern parking lot, striping and signage shall be provided at the driveways including “Do Not Enter” signs at the southern exit-only driveway and striped directional arrows identifying the entry and exit driveways. An R-1 Stop sign should be installed at the exit driveway. The sign should not obstruct sight lines and the size should be at the discretion of Caltrans.

Mitigation Monitoring and Reporting

These improvements shall be included in the Construction Contract and implemented by the Contractor. SCRCP shall monitor for compliance.

Impact Significance After Mitigation

The recommended improvements will provide safe access to Project parking areas and reduce the impact on safety to a less-than-significant level.

*d. Result in inadequate emergency access? **No impact***

Highway 1 provides emergency access along the length of the trail system. The Project parking lots provide emergency access to the trail system. However, the trail will be only five feet wide, so typical emergency response vehicles would be unable to access a medical emergency distant from the parking areas. This is a potentially significant constraint.

Mitigation Measure T-2: SCRCP shall include signage explaining who to call in case of a fire or emergency medical situation as well as the location of the nearest call box. SCRCP will initiate coordination with North Sonoma Coast Fire Protection District about access constraints on the Project site and a protocol for providing emergency response. SCRCP shall also coordinate with the Sheriff’s Office and State Parks to develop this protocol for emergency medical response to the site.

Mitigation Monitoring and Reporting

SCRCP shall implement this mitigation prior to the trail system opening for public access.

Impact Significance After Mitigation

SCRIP coordination with emergency responders would reduce the impact on emergency response constraints to a less-than-significant level.

XVIII. Utilities and Service Systems

1. *Setting*

The Project site is existing or former grazing land. It is not served by public utilities or service systems.

2. *Impacts*

- a. *Require or result in the relocation or construction of new or expanded water, wastewater treatment facilities, or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects? **Less than significant impact.***

The proposed Project will include a restroom at the Kashia reserve parking lot. The restroom will be placed near the picnic tables and disabled parking space at the south end of the lot. Placement of this facility would not result in any impacts beyond those assessed in this Initial Study. This restroom will be maintained and serviced by SCRP

- b. *Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? **No impact.***

Potable water would not be provided to the site. Visitors will be responsible for providing their own water.

- 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? **Less than significant impact.***

Wastewater from the restroom will be pumped out on a regular basis and disposed of at a permitted wastewater treatment facility that has capacity to accept hauled septage. The small amount of wastewater generated by one restroom would not be expected to adversely affect the capacity of the receiving facility.

- 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? **Less than significant impact.***

The primary construction will entail grading. It is not expected that grading of a trail on this relatively flat site would generate excess soil material that could not be reused on site. In the case excess cut material cannot be used on the trail site, it would be disposed of at a site licensed or permitted to receive fill material.

Otherwise, construction involves installation of a restroom, picnic table, benches, signs, and fencing. It is not expected that construction would generate a substantial amount of waste requiring disposal at a solid waste facility. This impact is considered less than significant.

The two parking areas will include solid waste receptacles that will be serviced by SCRP staff or a contractor. It is not expected that the small amount of solid waste generated would generate waste beyond the capacity of receiving landfills.

- e. *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? **No impact.***

The proposed Project construction would comply with all applicable regulatory requirements related to solid waste. Specifications for Project construction would contain requirements for the handling, storage, cleanup, and disposal of any hazardous materials, or other construction pollutants. This impact is considered less than significant.

XIX. Wildfire

1. Setting

The Project site is primarily vegetated with grasses and forbs and is mainly level. The site is designated as having a high fire hazard.

2. Impacts

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan? **Less than significant impact.***

The Project restricts all types of open flame, including campfires, barbecues, smoking, etc. The ignition risk from trail use is very low. Accordingly, use of the site would not be expected to ignite a wildfire that would substantially impair an emergency response plan or emergency evacuation plan. A much more likely scenario would be a wildfire descending the wooded ridge to the east and blocking Highway 1, as was the case in 2020 for the Meyers Fire a few miles to the south of the Project site. Such a fire could extend across Highway 1 to the Project site. However, the Project itself would not be the cause for any blocking or impeding access along Highway 1.

- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? **Less than significant impact.***

Recreational users would not be allowed on the site when a large wildfire was burning in the area to the east of the site. It is likely that Highway 1 would be closed in the area potentially threatened by a fire. Therefore, people would not be exposed to air pollution, nor uncontrolled spread of a wildfire across the Project site.

- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? **No impact.***

The Project will include few structures or infrastructure that would burn if a wildfire crossed onto the site. At worst, the restroom, some picnic tables, benches, and signs could burn, though concrete or masonry prefabricated structures do not burn easily. These facilities are not costly

to replace. No infrastructure is required to protect site resources from a wildfire. Accordingly, no additional fire-related infrastructure would be built, and there would be no impacts on the environment from such construction.

- d. *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?* **No impact.**

No residences will be constructed on the site, so they would not be subject to flooding or landslides. The site is level, so any people on the site would not be subject to landslides, plus it is expected the Project would be closed to the public if there was a risk from post-fire flooding or landsliding. Accordingly, there would be a less-than-significant impact from the potential ramifications of a wildfire in the area.

XX. Mandatory Findings of Significance

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

The proposed Project would involve grading of approximately two miles of trail. As described in Section IV, Biological Resources, trail construction would result in potentially adverse impacts to several special-status plant and animal species, special status vegetation communities, and wetlands. Mitigation measures have been recommended to avoid these impacts to sensitive biological resources or, where avoidance is not feasible given the constraints of the trail easements, the report includes mitigation measures to provide compensatory restoration of wetlands and other resources and/or to minimize the adverse effects of both trail construction and the prohibited, but likely occasional, off-trail use by recreational users. The proposed mitigation measures would reduce the potential for direct and indirect effects to these sensitive biological resources to a level that is less than significant.

The Project will require subsequent approvals from several regulatory agencies that issue permits or approvals for projects to ensure that biological and water quality resources are protected, including: a 1600 Lake and Streambed Alteration from the California Department of Fish and Wildlife; North Coast Regional Water Quality Control Board 401 Water Quality Certification; a Coastal Development Permit from the California Coastal Commission; a Nationwide Permit/or Individual Permit under Section 404 of the Clean Water Act for impacts to on-site wetlands from the U.S Army Corps of Engineers; possibly an Incidental Take Permit from the U.S Fish and Wildlife; and a grading permit from Permit Sonoma. These agencies will review this CEQA document and add or revise mitigations to further ensure adequate protection of environmental resources.

As discussed in Section V, Cultural Resources, there are no known historical resources or archaeological resources in the Project area. Tribal cultural resources will be protected in concert with the oversight of the Kashia Band of Pomo Indians of Stewarts Point Rancheria. Potential

impacts to inadvertently discovered archaeological resources, tribal cultural resources or human remains would be mitigated to a less-than-significant level with implementation of Mitigation Measures CR-1 and CR-2. No other cultural resources would be affected, and the proposed Project would not eliminate important examples of the major periods of California history or prehistory.

- 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 with mitigation incorporated.**

Cumulative environmental effects are multiple individual effects that, when considered together, are considerable or may compound or increase other environmental impacts. The proposed Project is a new recreational facility, which will be part of the California Coastal Trail.

The State and County have developed numerous parks and trails along the northern Sonoma Coast over the past 50 years. Trails on these parks were constructed to be consistent with Local Coastal Plan policies and requirements. All these projects were approved with Mitigated Negative Declarations indicating that public access could be constructed and used without significant adverse impacts to environmental resources or public safety. The proposed Project trails are a small addition to the coastal trail system on the north Sonoma coast that include the six coastal access trails on the Sea Ranch and Stillwater Cove Regional Park operated by SCRIP and miles of trails on Salt Point State Park, Ft. Ross State Park, and Sonoma Coast State Park to the south. The State Coastal Act calls for development on the California Coastal Trail, and the Project helps to implement this planned trail's completion.

The Project impacts can all be reduced to a less-than -significant level and would not make a cumulatively considerable contribution to a significant cumulative impact of trail development along the coast. There are no other proposed non-park-related projects in the immediate vicinity of the Project site, so there would be no cumulative impacts from the Project plus other nearby proposed developments. Cumulative impacts associated with projects in other more distant areas that could affect air quality, and climate change could potentially be significant. However, as described in this report, Project energy use, GHG emissions, and air

pollutant emissions are very short-term and minor, and the Project would not make a cumulatively considerable contribution any cumulative impact associated with energy use, climate change, or air pollution.

By including mitigation measures recommended in this report, the Project would not make a cumulatively considerable contribution to a cumulative impact associated with other local planned development or development in the region as a whole.

- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?* **Less than significant with mitigation incorporated.**

Project construction and operation would not be expected to cause a significant health risk nor adverse impact on human beings. Public safety will be ensured through standard SCRP patrolling augmented by emergency response in case of a medical emergency or fire. Implementing recommended mitigation measures, Project improvements will be designed to withstand probable seismic events. Flooding is not a concern at this site. Recommended mitigation measures will ensure safe ingress and egress from Project parking lots. Accordingly, direct and indirect impacts on human beings would be reduced to a less-than-significant level.

6.0 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 applicant. A **Mitigated Negative Declaration** will be prepared. _____ x

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 an earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. _____

Signature

Date

Mark Cleveland
Senior Park Planner

Contact Person and Phone Number

Mark Cleveland
Senior Park Planner
Sonoma County Regional Parks
2300 County Center Drive, Suite 120A
Santa Rosa, CA 95403
(707) 565-2041

7.0 Report Preparers

Lead Agency

Sonoma County Regional Parks
2300 County Center Drive, Suite 120A
Santa Rosa, CA 95403

Contact Person and Phone Number

Mark Cleveland
Senior Park Planner
(707) 565-2041

Environmental Consultants

Leonard Charles and Associates

Leonard Charles, Ph.D., Project Manager and Environmental Analyst
Lynn Milliman, M.A., Environmental Analyst
Jacoba Charles, M.A. & M.S., Biologist and Environmental Analyst

Questa Engineering

Jeffrey Peters, Principal
Margaret Henderson, ASLA, Principal Restoration Planner
Will Hopkins, P.G. Geologist
Oliver Reyes, Staff Landscape Architect
Colette Curran, Staff Landscape Architect
Hydrology/Water Quality
Geology/Soils,
Biological Resources