CEQA INITIAL STUDY
FOR THE
WILLOW CREEK COMMUNITY SERVICES DISTRICT
BRANNAN MOUNTAIN WATER STORAGE TANK PROJECT
WILLOW CREEK, CALIFORNIA

OCTOBER 21, 2020

APPLICANT FOR STATE WATER REVOLVING FUNDS:

WILLOW CREEK COMMUNITY SERVICES DISTRICT
135 WILLOW ROAD, WILLOW CREEK, CA 95573

CEQA LEAD AGENCY:

WILLOW CREEK COMMUNITY SERVICES DISTRICT

PREPARED BY:

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GENERAL INFORMATION ABOUT THIS DOCUMENT

The Willow Creek Community Services District (CSD) has prepared this Initial Study with Mitigated Negative Declaration for the proposed project located in Willow Creek, California. The Willow Creek CSD is the lead agency under the California Environmental Quality Act (CEQA). This document describes the project, what alternatives have been considered for the project, how the existing environment could be affected by the project, the potential impacts of each of the alternatives, and any proposed avoidance, minimization, or mitigation measures. The Initial Study will be circulated to the public and governmental agencies for 30 days for comment.

The Drinking Water State Revolving Fund (DWSRF) program is a federal-state partnership to help ensure safe drinking water. Created by the 1996 Amendments to the Safe Drinking Water Act (SDWA), the program provides financial support to water systems and to State safe water programs (https://www.epa.gov/drinkingwatersrf). In California, the State Water Resources Control Board administers the DWSRF program.

As part of the DWSRF application process, applicants are required to submit an Environmental Package, applicable CEQA documents, and additional supporting technical reports. Typically, the applicant is the CEQA Lead Agency and the State Water Resources Control Board is a CEQA Responsible Agency. As a Responsible Agency, the State Water Resources Control Board must make its own findings using information provided by the Lead Agency before funding a project. During the environmental review process, the DWSRF Environmental Review Staff will review the documents to determine adequacy of environmental information and compliance with state and federal environmental laws and regulations. The environmental review process must be completed prior to the State Water Resources Control Board financing approval and project construction.

The DWSRF Program is partially funded by the United States Environmental Protection Agency and therefore all projects financed by the DWSRF Program must comply with the federal cross-cutting requirements. Cross cutting requirements are those that are required by any entity that receives federal money - be they states, organizations, municipalities. These regulations cut across all programs touched by the federal government. The State Water Resources Control Board has the authority to initiate consultation with the relevant federal agencies having jurisdiction over the federal environmental laws and regulations. Any issues raised by the relevant federal agencies must be resolved prior to completing the State Water Resources Control Board environmental review process and financing approval.

PERMITS AND APPROVALS NEEDED

State Water Resources Control Board

As part of the DWSRF application process, applicants are required to submit an Environmental Package, applicable California Environmental Quality Act (CEQA) documents, and additional supporting technical reports. The environmental review process must be completed prior to the State Water Board financing approval. The Division of Drinking Water will also need to approve the proposed project.

Regional Water Board

Construction General Permit

Any construction project that disturbs at least one acre of land requires enrollment in the State's construction general permitting program under the National Pollutant Discharge Elimination System and implementation of a storm water pollution prevention plan.

County

Permits may be required by Humboldt County, such as a building permit, grading permit, encroachment permit, or a traffic control plan.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

PROPOSED MITIGATED NEGATIVE DECLARATION

This proposed Mitigated Negative Declaration (MND) is included to give notice to interested agencies and the public that it is the Lead Agency's intent to adopt an MND for this project. This does not mean that the Lead Agency's decision regarding the project is final. This MND is subject to change based upon comments received by interested agencies and the public.

The Lead Agency has prepared an Initial Study for this project, and pending public review, expects to determine from this study that the proposed project would not have a significant effect on the environment

Determination. (To be completed by the Lead Agency.)
On the basis of this initial evaluation:

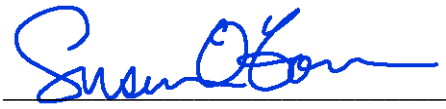
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

☐ I find that the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



12/18/2020

Susan O'Gorman, General Manager
Willow Creek Community Services District

Date

PROJECT DESCRIPTION

The State Water Resources Control Board (SWRCB) Division of Financial Assistance (DFA) has funded planning phase activities to address drinking water system deficiencies for the Willow Creek Community Services District CSD. The work is being conducted under Proposition 1 Technical Assistance and Support Program funding through the SWRCB, Agreement No. D16-12810, Work Plan No. 5137.

California Rural Water Association (CRWA) is executing the Work Plan on behalf of the Willow Creek Community Services District CSD. The Work Plan calls for expansion of their water storage capacity by construction of a new water storage tank in Willow Creek, Humboldt County, California. Willow Creek CSD currently serves treated water to an estimated 1,743 people with approximately 934 metered connections and a maximum day water demand of 1,800,000 gallons. The distribution system currently features approximately 24 miles of pipelines ranging in diameter from 4 to 12 inches. The water system has a storage capacity of 1,008,000 gallons spread out over several tanks in 5 pressure zones.

Additional storage capacity is needed for this water distribution system to work optimally. Additional storage will move the system closer to meeting minimum storage requirements under California regulations, Title 22 Section 64554, and it will add resiliency to the system by providing the only storage west of the Trinity River and north of Willow Creek in the northwest part of the town. Additional storage capacity will also allow the District's groundwater supply pumps to operate cost-effectively primarily during non-peak hours.

Willow Creek CSD is proposing to construct and operate a tank in Pressure Zone 1. The proposed storage tank will be constructed in the middle of an unaddressed, 0.5-acre parcel (Assessor Parcel Number 522-492-011-000) that is owned by Willow Creek CSD. The tank will be constructed of bolted steel plates, and will be painted to blend with the surrounding tree colors. The steel tank will be constructed on a concrete ring wall foundation on an excavated and graded level area. In addition, the proposed project includes on-site pipelines, valves (above and below ground), drain lines, storm drain culverts, chain link fencing and gate, and asphalt pavement around the tank.

The final tank size will be determined after several factors are considered, including available funds. Two sizes of steel tank are analyzed in this Initial Study: a 72-foot diameter tank that can store 650,000 gallons of water; and a 60-foot diameter tank that can store 409,000 gallons (37% reduction in volume). The smaller tank fits on the same graded pad with similar on-site pipes and appurtenances, although the smaller tank will have a larger asphalt surface around the perimeter. The smaller tank would cost less to construct than the larger tank. The larger tank is better at achieving project goals. The reduced volume will still provide more storage capacity that moves the water system toward meeting regulatory requirements for storage, will still provide needed resiliency in the northwest part of town, and will help optimize groundwater pumping.

Earthwork is needed to construct the tank at the designed elevation. It will consist of clearing and grubbing existing vegetation, removing about 4,600 cubic yards of cut material in the hill slope, placing and compacting fill material to make a flat area, and hauling about 4,500 cubic yards of export (to an appropriate and permitted off-site disposal area). The existing access road (250 feet in length) between Brannan Mountain Road and the tank site will be widened and paved to a top width of 15 feet. The access road is located within a public utility easement and access easement that is approximately 40 feet wide and the entrance is along Brannan Mountain Road. The public utility easement is on a privately-owned 48-acre parcel (Assessor Parcel Number 522-492-012-000) that is adjacent to the parcel owned by Willow Creek CSD (the tank site).

Also proposed is a new water pipeline that connects the proposed water tank to the existing distribution system located at the intersection of Brannan Mountain Road and Stage Coach Lane. The proposed water pipeline is 12 inches in diameter and will be placed 36 inches below the existing surface of the ground. The pipeline will run for approximately 250 feet from the new tank to Brannan Mountain Road underneath the access road. Then, the pipeline will run for approximately 250 feet along the north shoulder of Brannan Mountain Road (and within the road right-of-way) to the northeast corner of the intersection of Brannan Mountain Road and Stage Coach Lane, where it will tie in to an existing 8-inch waterline. Disturbed areas will be seeded with native or ornamental vegetation, as appropriate. The total project footprint is about 0.6 acre: 0.5 acre for the tank site and 0.1 acre for the new water pipeline and widened access road.

PROJECT ALTERNATIVES

Different Tank Location

Other locations were considered for the proposed water storage tank. A different location would require the purchase or lease of land by Willow Creek CSD at a certain elevation, construction of an access road, and construction of a water pipeline to tie the new tank to the existing distribution system. In contrast, the proposed location has several advantages. Willow Creek CSD already owns the 0.5 acre project site, which was reserved for a future tank. This location already has an access road, although this road needs to be improved to conform to current access requirements. This location is conveniently close to existing pumps and waterlines in the distribution system. Finally, the 0.5-acre project site is west of the Trinity River and north of Willow Creek, providing the distribution system with storage capacity if the pipelines attached to the bridges should fail. A new tank location could have greater environmental impacts as well. Thus, this alternative is not feasible.

No-Build (No-Action) Alternative

The No-project Alternative would keep the water distribution system as it is, with no additional storage capacity. Willow Creek CSD would not receive any grant funds from the DWSRF. The existing system has inadequate capacity to comply with California regulations and has no capacity to serve a portion of the town under potential emergency conditions. The lack of additional water storage means that the electric pumps will continue to operate during peak hours, when electrical costs are higher. The No-project Alternative is not acceptable for these reasons.

ENVIRONMENTAL SETTING

The topography of the Project Area is a moderately sloping hillside that drops towards the southeast. The elevation ranges from approximately 610 feet to 760 feet above mean sea level. The Project Area is heavily forested with conifers. The tank site is obscured from public view by both the trees and the terrain. The project area is situated at the base of Brannan Mountain, which rises to 4,000 feet. Much of the surrounding land is national forest (Six Rivers National Forest). Brannan Mountain road is a paved two lane road with overhead transmission and distribution lines; this road provides access to residential estates from the Trinity River Highway (SR 96). To the east is the civic center of the town of Willow Creek, with the closest land uses being a strip mall, school, PG&E substation, and Caltrans maintenance station. Along the Trinity River is a large gravel quarry mercer (Fraser Co. Willow Creek Plant). National forest, residential estates, and open space are the land uses to the north and west.

EVALUATION OF ENVIRONMENTAL IMPACTS

This section identifies the environmental impacts of this project by answering questions from Appendix G of the CEQA Guidelines, the Environmental Checklist Form. All analyses take in to account the entire action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational, impacts.

Impacts are categorized as follows:

- **Potentially Significant Impact** is appropriate if there is substantial evidence that an effect is significant, or where the established threshold has been exceeded. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) may be required.
- **Less Than Significant with Mitigation Incorporated** applies where the incorporation of mitigation measures would reduce an effect from Potentially Significant Impact to a Less Than Significant Impact. Mitigation measures are prescribed to reduce the effect to a less than significant level.
- **Less Than Significant** applies when the project will affect or is affected by the environment, but based on sources cited in the report, the impact will not have an adverse effect. For the purpose of this report, beneficial impacts are also identified as less than significant. The benefit is identified in the discussion of impacts, which follows each checklist category.
- A **No Impact** answer is adequately supported if referenced information sources show that the impact simply does not apply to projects like the one involved. A No Impact Answer is explained where it is based on project-specific factors as well as general standards.

1. AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

DISCUSSION

1 a-d) There is no designated scenic vista or State Scenic Highway in the vicinity of the Project. The nearest Scenic Highway is 50 miles to the north: Route 101, spanning from Del Norte Redwoods State Park to Crescent City. The nearest Wild and Scenic River is the Trinity Wild and Scenic River, which is about 2,000 feet to the east. The Project Area is 750 feet west of the Wild and Scenic corridor (which is a quarter-mile buffer from the river).

The Project Area is heavily forested with conifers and has mountainous terrain. The tank site is obscured from public view by both the trees and the terrain. The proposed waterline will be underground and will not be visible to the public. There are no applicable zoning laws. The proposed Project does not propose any new development, construction or physical change to the environment that would directly or indirectly result in any impacts to aesthetic resources. The proposed project will not include any new lighting tor otherwise compromise any views.

MITIGATION

No mitigation is required.

2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☒	☐
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☒	☐
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☒	☐

DISCUSSION

2 a) The subject property is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the maps prepared, pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The majority of the project area is located on areas that are already developed or designated for other uses. Therefore, the proposed project will not result in any significant conversion of agricultural land to non-agricultural uses.

2 b,c) The 0.5-acre parcel is zoned AG-B-5(10) which allows for non-agricultural uses and the parcel is not enrolled in a Williamson Act contract. The parcel is not zoned forest land or timberland. Therefore, the proposed project does not conflict with existing zoning or with a Williamson Act contract or zoning of forest or timberland.

2 d,e) The 0.5-acre parcel is not zoned farm land, forest land, or timberland. However, implementation of the project will require the removal of conifer trees (approximately 0.1 to 0.3 acre of land with trees). The removal of such a small amount of land with trees is less than significant, as they project area is surrounded by millions of acres of forestland/timberland.

MITIGATION

No mitigation is required.

3. AIR QUALITY

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

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?	☐	☐	☒	☐

DISCUSSION

Construction and operational activities from any land use project can generate air pollutants and greenhouse gasses. An air quality assessment was performed for this project (Natural Investigations Co. 2020). This assessment estimated the types and quantities of air emissions associated with construction and operation of the proposed project on both the daily maximum and annual average levels. Emissions were calculated using the California Emissions Estimator Model (CalEEMod)®, Version 2016.3.2 (California Air Pollution Control Officers Association; Trinity Consultants, 2017). Model output and reports from CalEEMod® are provided in Appendix 1. This assessment then determined if project emissions would cause a significant air quality impact by comparison to established air quality thresholds.

The U.S. Environmental Protection Agency has established national ambient air quality standards, and the California Air Resources Board has established California ambient air quality standards. California Air Resources Board regulates mobile pollutant sources directly, but delegates regulation of stationary standards to local air districts. California Air Resources Board and local air districts maintain numerous air quality monitoring stations throughout California that continually measure ambient concentrations of major air pollutants. The pollutants of greatest concern are: ozone (O_3); carbon monoxide (CO); nitrogen dioxide and more generally, nitrous oxides (NO_2 and NO_x); sulfur dioxide (SO_2); and particulate matter less than 10 microns and less than 2.5 microns (PM_{10} and $PM_{2.5}$).

The project is located within the North Coast Air Basin. The North Coast Air Basin is comprised of three air districts, the North Coast Unified AQMD, the Mendocino County AQMD, and the Northern Sonoma County APCD. The jurisdiction of the North Coast AQMD is Del Norte, Humboldt, and Trinity Counties.

In determining whether a project has significant air quality impacts on the environment, planners typically apply their local air district's thresholds of significance to projects in the review process. However, the District has not formally adopted significance thresholds, but rather utilizes the Best Available Control Technology (BACT) emission rates for stationary sources as defined and listed in the NCUAQMD Rules and Regulations, Rule 110 - New Source Review (NSR) And Prevention of Significant Deterioration (PSD), Section 5.1 - BACT (pages 8-9).

NCUAQMD Significance Thresholds, Best Available Control Technology (Rule 110)

Pollutant	Daily (pounds/day)	Annual (tons/year)
CO	500.0	100.0
Fluorides	15.0	3.0
Hydrogen sulfide	50.0	10.0
Lead	3.2	0.6
NOx	50.0	40.0
PM10	80.0	15.0
PM2.5	50.0	10.0
ROGs	50.0	40.0
Reduced sulfur compounds	50.0	10.0
Sulfur oxides	80.0	40.0
Sulfuric acid mist	35.0	7.0
Total reduced sulfur compounds	50.0	10.0

Comparison of Daily Construction Emissions Impacts with Thresholds of Significance

Criteria Pollutants	Project Emissions (pounds/day) (unmitigated)	Threshold (NCUAQMD) (pounds/day)	Significance of Impact
ROG (VOC)	6.05	50	Less than significant
NOx	8.49	50	Less than significant
CO	7.81	500	Less than significant
SOx	0.01	80	Less than significant
Total PM_{10}	65.35	80	Less than significant
Total $PM_{2.5}$	7.01	50	Less than significant
GHG (as CO_{2e})	1,178	No threshold	Less than significant

Comparison of Daily Operational Emissions Impacts with Thresholds of Significance

Criteria Pollutants	Project Emissions (pounds/day) (unmitigated)	Threshold (NCUAQMD) (pounds/day)	Significance of Impact
ROG (VOC)	0.14	50	Less than significant
NOx	0.13	50	Less than significant
CO	0.29	500	Less than significant
SOx	> 0.01	80	Less than significant
Exhaust PM_{10}	10.47	80	Less than significant
Exhaust $PM_{2.5}$	1.05	50	Less than significant
GHG (as CO_{2e})	73	No threshold	Less than significant

Comparison of Annual Operational Emissions Impacts with Thresholds of Significance

Criteria Pollutants	Project Emissions (tons/year)	Threshold (NCUAQMD) (tons/year)	Significance of Impact
ROG (VOC)	0.02	40	Less than significant
NOx	0.02	40	
CO	0.04	100	Less than significant
SOx	> 0.01	40	Less than significant
Exhaust PM_{10}	1.44	15	Less than significant
Exhaust $PM_{2.5}$	0.14	10	Less than significant
GHG (MT/yr CO_{2e})	10	1,100*	Less than significant

* SMAQMD / BAAQMD threshold used because NCUAQMD has no GHG threshold.

3a) At the state level, there is California's State Implementation Plan, which is the statewide plan to achieve attainment of all federal air quality standards. A project would obstruct implementation of the State Implementation Plan if it contributed significantly to increases in regional levels of housing, population, or traffic.

The proposed project would conflict with, or obstruct implementation, the Clean Air Act if it violated, or contributed significantly to a violation of, federal ambient air quality standards. The USEPA's General Conformity Rule specifies *de minimis* thresholds for major air pollutants. As shown in Table 4, the proposed project's emissions are less than the *de minimis* thresholds. Thus, the proposed project conforms with the State Implementation Plan for attainment of federal air quality standards and would not contribute significantly to cumulative air quality impacts.

There are no adopted local air quality plans to analyze for conflicts. NCUAQMD does have a Particulate Matter PM10 Attainment Plan draft report. A project would conflict with applicable air quality plans if it generated significant quantities of particulate matter (PM_{10} or $PM_{2.5}$), or if it exceeded the project-level thresholds established by NCUAQMD. Air emissions modeling performed for this project demonstrates that the project, in both the construction phase and the operational phase, will not generate significant quantities of particulate matter and does not exceed the project-level thresholds established by NCUAQMD. Furthermore, the proposed project, in both the construction phase and the operational phase, will not generate any odors or toxins. Therefore, implementation of the project will have no impact upon implementation of the applicable air quality plans.

3b) NCUAQMD has established the project-level thresholds to define substantial contribution for both operational and construction emissions (see Table 1). NCUAQMD does not have adopted thresholds for other air pollutants, so we used thresholds from the nearest applicable air quality management district, primarily the Sacramento Metropolitan Air Quality Management District and Bay Area Air Pollution Control District.

NCUAQMD does not have adopted thresholds for greenhouse gas emissions, but the Sacramento Metropolitan Air Quality Management District and the Bay Area Air Quality Management District have established 1,100 metric tons of carbon dioxide equivalents (MT CO_2e) annually for both construction and operational phases as the threshold to determine a significant impact. This threshold was used for this assessment.

A comparison of project emissions, as modeled by CalEEMod, with the thresholds of significance indicates that project emissions are less than significant for both the construction and operational phases. The project, in both the construction and operational phases, has annual emissions of greenhouse gasses of 10 Metric Tons CO_2e, which is well below the threshold annual quantity of 1,100 Metric Tons CO_2e. Implementation of the project will have a less than significant cumulative impact upon any criteria air pollutant.

3c) Those who are sensitive to air pollution consist of children, the elderly, and persons with preexisting respiratory, immune, or cardiovascular illness. A sensitive receptor is typically a location that houses or attracts these sensitive people; examples include hospitals, day care centers, parks, residential areas, convalescent facilities, and schools.

No sensitive receptors exist in the project area. The closest sensitive receptors are residences, the closest of which are about 500 feet from the project boundary to the south. While sensitive receptors do exist in the project vicinity, the project will not emit significant concentrations of air pollutants. The project does not emit odors or toxic substances. Therefore, the project will have a less than significant impact upon sensitive receptors.

3d) Odor impacts on residential areas and other sensitive receptors, such as hospitals, day-care centers, schools, etc. warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, worksites, and commercial areas. Two situations create a potential for odor impact. The first occurs when a new odor source is located near an existing sensitive receptor. The second occurs when a new sensitive receptor locates near an existing source of odor.

Implementation of the proposed project will not locate sensitive receptors closer to an odor generator. No sensitive receptors exist in the project area. The closest sensitive receptors are residences, the closest of which are about 500 feet from the project boundary to the south. While sensitive receptors do exist in the project vicinity, the project will not emit significant concentrations of air pollutants. The project does not emit odors or toxic substances. Therefore, the project will have a less than significant impact of odors or other emissions affecting people.

MITIGATION

No mitigation is required.

4. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

DISCUSSION

A Biological Assessment has been conducted for the project and is provided as Appendix 2:

- Natural Investigations Co., Inc. 2019. Biological Assessment for the Willow Creek Community Services District Tank Replacement Project, Willow Creek, California. Prepared for California Rural Water Association. 43 pp.

4 a) During the field survey, no special-status species were detected within the Project Area. The California Natural Diversity Database was queried and any reported occurrences of special-status species were plotted in relation to the project area using GIS software (see Exhibits). The CNDDB reported no special-status species within the project area. In the vicinity, various special-status species were reported, primarily associated with the Trinity River corridor.

During the field survey, no federally-listed species were detected. No special-status species were detected. The CNDDB reported no special-status species occurrences within the Project Area. No regionally-occurring special-status species were determined to have a medium or high potential to occur within the project area. No impacts to listed species or special-status species are expected from implementation of the proposed project. This is due primarily to the fact that the project area is already disturbed or developed, and is not near any natural water resources.

Special-status bird species were reported by the CNDDB or USFWS in the vicinity of the Project Area, including marbled murrelet, northern spotted owl, western snowy plover, yellow-billed cuckoo, great blue heron, osprey, and northern goshawk. The Project Area contains suitable nesting habitat for various bird species because of the presence of trees and poles. However, no nests were observed during the field survey. If construction activities are conducted during the nesting season, nesting birds could be directly impacted by tree removal and indirectly impacted by noise, vibration, and other construction-related disturbance. Therefore, Project construction is considered a potentially significant adverse impact to nesting birds before mitigation.

4 b) The Project Area is not within any designated listed species' critical habitat. The CNDDB reported no special-status habitats within the Project Area. The CNDDB reported 4 special-status habitats in a 10-mile radius outside of the Project Area: Klamath/North Coast Interior Headwater Fishless Stream, Klamath/North Coast Rainbow Trout Stream, Klamath/North Coast Fall/Winter Run Chinook Salmon River, and Upland Douglas Fir Forest. The project area contains the following terrestrial vegetation communities: ruderal/developed; and mixed conifer forest. The Project Area contains no special-status habitats. Project implementation will not impact any special-status habitats. Implementation of the Project would result in the loss of some mixed conifer forest and ruderal habitat, but this small amount of land conversion is not considered to be a significant impact upon protected habitats or sensitive natural communities or the movement of wildlife species. Therefore, no mitigation is required.

Because the project area is not within a critical habitat, and because no sensitive habitats will be impacted, the Project will have No Effect upon federally-designated critical habitat.

4 c) A formal assessment for the presence of potentially-jurisdictional water resources within the project area was also conducted during the field survey. The entire project area has upland features and contains no wetlands or channels (i.e., no waters of the US). The USFWS National Wetland Inventory (see Exhibits) also reported no water features within, or adjacent to, the project area. The proposed project will have no impact upon wetlands or channels. To address potential indirect impacts to receiving water bodies from pollution during construction of the proposed project, an erosion control plan and spill control plan will be implemented.

4 d) No designated wildlife corridors exist within or directly adjacent to the Project Area. However, in the vicinity there are some important wildlife corridors: the Trinity Wild and Scenic River corridor; the Willow Creek corridor; and the Six Rivers National Forest. Fishery resources exist in both Trinity River and Willow Creek. Implementation of the proposed project would necessitate erection of a security fence around the tank compound. The water line is buried and is not a barrier to animal movement. The fence will not allow animal movement and may act as a local barrier to wildlife movement. However, the fenced area is very small (circa 0.3 acre) and it is surrounded by open space, allowing wildlife to move around the fenced area. Thus, implementation of the proposed project will have a less than significant impact upon wildlife movement, corridors, and native wildlife nursery sites.

4 e,f) No relevant local policies or ordinances were identified. The project area is not within the coverage area of any adopted Habitat Conservation Plan or Natural Community Conservation Plan. No impacts to habitat plans will occur from project implementation.

MITIGATION

Bio-1: Pre-construction Special-status Species and Nesting Bird Survey.

If construction activities would occur during the nesting season (usually March to September), a pre-construction survey for the presence of special-status bird species or any nesting bird species should be conducted by a qualified biologist within 500 feet of proposed construction areas. If active nests are identified in these areas, CDFW and/or USFWS should be consulted to develop measures to avoid "take" of active nests prior to the initiation of any construction activities. Avoidance measures may include establishment of a buffer zone using construction fencing or the postponement of vegetation removal until after the nesting season, or until after a qualified biologist has determined the young have fledged and are independent of the nest site. With the implementation of this mitigation measure, adverse impacts upon special-status bird species and nesting birds would be reduced to a less-than-significant level.

Because no federally-listed species occur in the project area, and because of the avoidance measures that will be implemented, the Project will have No Effect upon federally-listed species.

5. CULTURAL RESOURCES

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

DISCUSSION

The following cultural resources assessment was prepared for this project and is bound separately due to the sensitive nature of the information:

- Natural Investigations Co., Inc. 2020. Cultural Resources Inventory for the Willow Creek Community Services District Brannan Mountain Storage Tank Project, Humboldt County, California. Prepared for Willow Creek Community Services, Willow Creek, California.

Prehistoric Setting

Two organizational schemes are used to interpret the prehistory of northwest California, one chronological and one cultural. For archaeological purposes, the cultural scheme is most relevant. This organization follows the work of Fredrickson (1974, 1984) relying on two basic units, pattern, and aspect. Due to the large size of the northwestern California region, two versions of this pattern chronology occur: one for the northern counties (Del Norte, Siskiyou, Humboldt, and Trinity) and one for the Southern Counties (Lake, Mendocino, and Sonoma). Six basic patterns are recognized: Post, Borax Lake, Berkeley, Mendocino, Gunther, and Augustine. In the North, the Berkeley pattern and Augustine Patterns are not represented in regional archaeological studies and in the South, the Gunther Pattern is not represented. (Natural Investigations Company 2020).

Ethnographic Setting

Ethnographically, this project location falls within tribal territory of the Hupa; as cited in Natural Investigations 2020. The Hupa Language is a part of the Athapaskan Language Family and was spoken by the Chilula and Whilkut peoples, to the west. It is the most geographically widespread language family on the North American continent and in California, the language family consists of the Hupa, Mattole, Wailaki (Sinkyone/Lassik), Kato, Eyak, Tlingit and possibly the Haida peoples. The Hupa were bordered by the Karok and the Yurok to the north, the Chimariko and the Wintu to the east, the Chilula and the Whilkut to the west and the Nongatl to the south; cited in Natural Investigations Company 2020.

Historic Setting

Humboldt County was formed in 1853 from parts of Trinity County. The first recorded entry by people of European origin was a landing by the Spanish in 1775 in Trinidad. In the late 1820s, fur trappers of the Hudson's Bay Company traveling south from Fort Vancouver reached the Klamath River basin. Although Spanish explorers and Russian fur hunters had earlier touched Humboldt's coastline, it took a month-long westward expedition led by Josiah Gregg to establish a route between the Trinity gold fields and the coast. The 1850s saw discoveries of rich placer and lode gold deposits along the predominantly Shasta areas of the Klamath, Trinity, Shasta, and other rivers in northwestern California. Miners searching for gold in the

Klamath Mountains and Trinity Alps in the aftermath of the California Gold Rush first discovered gold along Salmon Creek in the spring of 1850, and additional deposits were found on the main stem by July. Gold was also discovered in great quantities in Shasta lands at French Gulch and Yreka. Humboldt County did not prove a major source of gold although to the east Willow Creek and Orleans developed mining-based economies, and beach sand under Gold Bluffs was worked with limited success. However, the coastal towns of Eureka, Arcata (originally called Union) and Trinidad grew into prosperous and notoriously rowdy ports and supply centers for the mines.

Massive redwood trees, some over 2,000 years old and as tall as 300 feet, thrived in the narrow fog belt along California's northwest coast. Felling and milling activities began almost immediately as lumbermen, used to smaller eastern trees, developed new techniques and tools to deal with the huge redwoods. Timber companies multiplied, expanding operations inland, building rail links, and scattering the area with small lumber-based towns and temporary camps. The need to ship out timber plus the ready availability of wood stimulated a local ship building industry. Fishing for crab, oysters, ocean fish and even whales grew into major industries.

Farmers from many parts of the world were drawn to the rich soils around Humboldt Bay and several river bottoms, while the hills provided good grazing. Sheep raised here produced exceptional fleece, and the dairy industry prospered. Fruit growing was also successful with the area becoming particularly known for apples. Humboldt towns grew, and the more prosperous citizens built elegant homes using local wood. The difficulties of road travel over the mountains, and the dangers and discomfort of sea travel, kept the area fairly isolated. By the beginning of the early 20th century, however, with the completion of rail connections, building the Redwood Highway and the rise of automobile use, tourism quickly joined timber and fishing as a major industry as the previous isolated nature of the region began to be opened up.

Willow Creek's first non-indigenous settlers were Chinese laborers from the mining and lumber camps, which earned the town the name China Flat (Durnham 1998:168). The China Flat post office opened in 1878, and changed its name to Willow Creek in 1915.

Results of Site Research and Survey

A cultural resources literature search was completed on January 25, 2019 by the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) at Sonoma State University, Rohnert Park. The records search at the NWIC indicates a total of five prior cultural resources studies covered portions of the APE and eight additional studies were accomplished within a 0.50-mail radius of the APE. The records search by the NWIC indicates a total of 5 cultural resources and one bridge (#04 0135 - ineligible), Willow Creek/SR 96 have been previously recorded within the 0.5-mile search radius, none of which are mapped within the APE. The five previously recorded resources outside the APE comprise a prehistoric site with habitation debris consisting of fire cracked rock and midden soils and one isolated prehistoric basalt manuport. The three historic-era resources include two water conveyance systems and an old cabin site that encompasses a buried privy, a segment of the former Humboldt County Road, rock retaining wall, and a slab marking the location of the former Jehovah’s Witness Kingdom Hall (circa 1960s) (Natural Investigations Company 2020).

A systematic survey of the project area was conducted by Natural Investigations Company archaeologist, Dylan Stapleton, on February 1, 2019. The APE is best characterized as a rural, semi-wooded environment on a mountain backslope. Intensive-level survey transects performed to identify archaeological resources were spaced apart at intervals no greater than 5 meters. No prehistoric or ethnographic sites, and no other historic-era resources were identified during survey of the APE. A modern, junked vehicle and associated modern trash is present in the northern corner of the terraced platform of the APE.

Visible ground surface within the project areas was carefully examined for cultural material (e.g., flaked stone tools, tool-making debris, stone milling tools, or fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions and features indicative of the former presence of structures or buildings (e.g., postholes, foundations), or historic-era debris (e.g., metal, glass, ceramics) (Natural Investigations Company 2020).

The sensitivity is low for discovery of archaeological deposits, materials, or features by implementation of the project.

Native American Outreach

Natural Investigations Company contacted the Native American Heritage Commission (NAHC), requesting a search of their Sacred Lands File for traditional cultural resources within or near the project areas. The reply from the NAHC, dated August 26, 2020, states that their search was negative for sacred lands or other heritage sites.

By certified letter dated August 27, 2020, Natural Investigations Company contacted each of the Native American tribes provided by the NAHC, requesting any information regarding sacred lands or other heritage sites that might be impacted by the project. If no response was received, follow-up telephone calls were made on September 11, 2020, and messages left on voice mail.

- Hoopa Valley Tribe, Ryan Jackson, Chairperson: Mr. Jackson was unavailable on September 11, 2020; a voice mail message was left.
- Shasta Nation, Roy Hall, Chairperson: Mr. Hall was unavailable on September 11, 2020; a voice mail message was left.
- Tsnugwe Council, Paul Ammon, Chairperson: Mr. Ammon was unavailable on September 11, 2020; a voice mail message was left.

5 a) No historical resources, herein referring to historic-era architectural or built-environment resources, were identified through background research or during pedestrian survey of the project areas. Therefore, **no impact** would occur to historical resources and no mitigation is necessary.

5 b) No prehistoric or historic-era archaeological sites or ethnographic sites were identified during survey of the project areas (Natural Investigations Company 2020). Although the potential for discovery of buried archaeological materials within the project areas is considered to be low, it is possible that buried or concealed archaeological resources could be present that may be discovered during ground-disturbing and other construction activities associated with the project. Inadvertent discovery or damage to archaeological resources could be a significant impact. Implementation of mitigation measure CUL-1 would reduce this impact to a **less-than-significant level**.

5 c) Based on the documentary research described above, no evidence suggests that any prehistoric or historic-era marked or unmarked human interments are present within or in the immediate vicinity of the project site (Natural Investigations Company 2020). However, there is the potential for unmarked, previously unknown Native American or other graves to be present and be uncovered during construction activities. California law recognizes the need to protect historic-era and Native American human burials, skeletal remains, and grave-associated items from vandalism and inadvertent destruction and any substantial change to or destruction of these resources would be a significant impact. Implementation of the following mitigation would reduce this impact to a **less-than significant level**.

MITIGATION

Mitigation Measure CUL-1: Inadvertent discovery of historical and archaeological resources.
In the unlikely event that buried cultural deposits (e.g., prehistoric stone tools, milling stones, historic glass bottles, foundations, cellars, privy pits) are encountered during project implementation, all ground-disturbing activity within 50 feet of the resources shall be halted and a qualified professional archaeologist (36 CFR 61) shall be notified immediately and retained to assess the significance of the find. Construction activities could continue in other areas. If the find is determined to be significant by the qualified archaeologist (i.e., because it is determined to constitute either a historical resource or a unique archaeological resource), the archaeologist shall develop appropriate procedures to protect the integrity of the resource and ensure that no additional resources are affected. Procedures could include but would not necessarily be limited to preservation in place, archival research, subsurface testing, or contiguous block unit excavation and data recovery.

Mitigation Measure CUL-2: Inadvertent discovery of human remains.
In accordance with the California Health and Safety Code (CHSC), Section 7050.5, and the Public Resources Code (PRC) 5097.98, regarding the discovery of human remains, if any such finds are encountered during project construction, all work within the vicinity of the find shall cease immediately, a 50-foot-wide buffer surrounding the discovery shall be established, and the District shall be immediately notified. The County coroner shall be contacted immediately to examine and evaluate the find. If the coroner determines that the remains are not recent and are of Native American descent, the Coroner will notify the Native American Heritage Commission, which will determine and notify a Most Likely Descendent (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

6. ENERGY

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

DISCUSSION

5 a,b) Implementation of the proposed project will not cause a significant increase in existing energy consumption. The only energy consumption is from pumping groundwater from District wells and from pressurizing the water supply lines. In fact, a reduction in energy consumption is expected. The proposed project would provide additional storage capacity to the system, which would also allow the electric pumps that draw groundwater from the District's wells to be run only on non-peak hours. Because the current system does not have enough storage capacity, the electric pumps run all day, every day, including during peak hours when electricity is expensive. No agency plans for renewable energy resources or energy efficiency plans would be impacted as a result of implementation of the Proposed Project. The proposed project will have a less than significant impact upon energy resources.

MITIGATION

No mitigation is required.

7. GEOLOGY AND SOILS

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

DISCUSSION

7 a-d) The Project Area is in the following physiographic province: the California Coast Ranges section of the Pacific Border Province (Fenneman and Johnson 1946). The surficial geology of the Project Area is Jurassic-age metasedimentary marine bedrock (Jennings et al. 1977). The Project Area is not on a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning. However, the nearest earthquake fault is Grogan Fault which is only 8.5 miles to the west. Thus, the Project Area carries some risk of seismic activity. Construction of the proposed project will require permitting from the County and conformance to applicable seismic building standards (e.g. California Building Code and International Building Code seismic building standards). These standards vary by zone and require structures and infrastructure to be built to withstand seismic effects such as rupture, shaking, or liquefaction. Therefore, the proposed project would have a less than significant impact regarding seismic forces and failures because of existing seismic building code requirements.

The Project Area is in a zone of landslide risk. The California Geological Survey (2006) has mapped the Highway 299 corridor between Blue Lake and Willow Creek as an area prone to landslides. Therefore, landslides are considered to be a potentially significant risk before mitigation.

According to the Natural Resources Conservation Service's soil database "SSURGO/STATSGO", there is one mapped soil unit within the Project Area: "Clallam-Hugo-Holland families association, deep, dry, 35 to 70 percent slopes." The soil is described as "residuum weathered from metasedimentary rock." The soil

is not listed as expansive, but is highly erodible. Construction of the proposed project will require implementation of a sediment and erosion control plan, which has been added as a project feature. Therefore, erosion risk will be reduced to a less than significant level. Additionally, for any project that disturbs 1 acre or more, the project proponent must enroll under the SWRCB's Construction General Permit prior to the initiation of construction. In conjunction with enrollment under this Permit, a SWPPP, Erosion Control Plan, and a Hazardous Materials Management/Spill Response Plan must be created and implemented during construction to avoid or minimize the potential for erosion, sedimentation, or accidental release of hazardous materials. No mitigation is necessary.

7 e) The Project does not involve a residence or human occupation of the site. The project does not include the use of, or construction of, new septic tanks and associated disposal facilities. Portable toilets will be available for construction workers. Therefore, the Project would have no impact upon human waste disposal.

7 f) Project plans, geologic maps of the project site, and relevant geological and paleontological literature were reviewed to determine which geologic units are present within the project site and whether fossils have been recovered within the project site or from those or similar geologic units elsewhere in the region. A search of the database maintained by the University of California Museum of Paleontology (UCMP) indicates there are no vertebrate or invertebrate localities within a 0.50-mile radius of the APE (UCMP 2019). Five know assemblages are noted within Humboldt County (Gunther Island, Mattole River, Patrick's Point, Spanish Flat, Stone Lagoon). All five assemblages contained exclusively Holocene era mammalian fossils and all are within the North Coast Ranges physiographic province located along the coastal region of Humboldt County. These localities are all associated with the Franciscan complex. The project site is within the Galice Formation. The Galice Formation has an unproven fossil record; and thus, be expected to have a low sensitivity for fossils. Additionally, the project site contains no unique geologic features.

No paleontological resources or unique geologic features are known to exist within or near the project site (Natural Investigations Company 2020). As noted, the project site is within the Galice formation and has a low sensitivity for paleontological resources. No mitigation measures for paleontological resources are required.

MITIGATION

Mitigation Measure GEO-1: Ensuring Project Design Addresses Landslide Risk
Because the Project Area is in an area of known landslide risk, a geotechnical investigation will be performed that will provide design criteria and recommendations for the final design of the foundation, side slopes, access road, and any potential retaining walls. With the incorporation of design criteria and recommendations from the geotechnical study, landslide risk will be reduced to a less than significant risk.

8. GREENHOUSE GAS EMISSIONS

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

DISCUSSION

Construction and operational activities from any land use project can generate air pollutants and greenhouse gasses. An air quality assessment was performed for this project. This assessment estimated the types and quantities of air emissions associated with construction and operation of the proposed project on both the daily maximum and annual average levels. Emissions were calculated using CalEEMod® (California Air Pollution Control Officers Association; Trinity Consultants, 2017). Model output and reports from CalEEMod® are provided in Appendix 1. This assessment then determined if project emissions would cause a significant air quality impact by comparison to established air quality thresholds.

8 a) The main sources of project emissions are from construction activities: for example, the diesel exhaust from the equipment and tailpipe emissions from cars and trucks. Operation of the tank will not generate emissions, and no significant increase in existing energy consumption from groundwater pumping will occur. In fact, a reduction in energy consumption is expected.

NCUAQMD does not have adopted thresholds for greenhouse gas emissions, but the Sacramento Metropolitan Air Quality Management District and the Bay Area Air Quality Management District have established 1,100 metric tons of carbon dioxide equivalents (MT CO_2e) annually for both construction and operational phases as the threshold to determine a significant impact. This threshold was used for this assessment.

A comparison of project emissions, as modeled by CalEEMod, with the thresholds of significance indicates that project emissions are less than significant for both the construction and operational phases. The project, in both the construction and operational phases, has annual emissions of greenhouse gasses of 10 MT CO_2e, which is well below the threshold annual quantity of 1,100 MT CO_2e. Implementation of the project will have a less than significant cumulative impact upon greenhouse gas emissions.

8 b) NCUAQMD does not have adopted thresholds for greenhouse gas emissions, and no other regulatory agency limits greenhouse gas emissions in Humboldt County. Therefore, the proposed project cannot conflict with a plan or policy because none exist. The proposed project is consistent with the thresholds established by the nearest air districts because it has annual emissions of greenhouse gasses below their thresholds.

MITIGATION

No mitigation is required.

9. HAZARDS AND HAZARDOUS MATERIALS

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

DISCUSSION

9 a) During construction of the proposed projects, surface water quality has a minor potential to be degraded from the accidental release of hazardous materials or petroleum products from sources such as heavy equipment servicing or refueling. To address potential indirect impacts to receiving water bodies from pollution during construction of the proposed projects, an erosion control plan and spill control plan will be implemented. The area of disturbance for construction of proposed project is anticipated to be less than 1 acre. For any project that disturbs 1 acre or more, the project proponent must enroll under the SWRCB's Construction General Permit prior to the initiation of construction. In conjunction with enrollment under this Permit, a SWPPP, Erosion Control Plan, and a Hazardous Materials Management/Spill Response Plan must be created and implemented during construction to avoid or minimize the potential for erosion, sedimentation, or accidental release of hazardous materials. Operation of the project will not involve any significant quantities of hazardous materials. No mitigation is necessary.

9 b) The project will not 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, because any proposed use or construction activity that might use hazardous materials is subject to permit and inspection by the Hazardous Materials Division of the County Fire Department. Furthermore, operation of the project will not require the use of hazardous materials and there will be no human occupation of the project site.

9 c) The project uses will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, because the project does not propose the use of hazardous materials and all existing and proposed schools are more than one-quarter mile away from the project site. If such uses are proposed in the future on this site, they will be subject to permit and inspection by the Hazardous Materials Division of the County Fire Department and in some instances additional land use review.

9 d) The following hazardous materials databases were queried in September 2020:

- EnviroStor is an online search and Geographic Information System tool for identifying sites that have known contamination or sites for which there may be reasons to investigate further. The EnviroStor database includes the following site types: Federal Superfund sites (National Priority List); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites.
- GeoTracker is a geographic information system maintained by the California State Water Resources Control Board (SWRCB) that provides online access to environmental data at the Internet address (URL) = http://geotracker.waterboards.ca.gov/.

The project site is not included on a list of hazardous materials sites. The GeoTracker database and EnviroStor database did not report contamination cases or hazardous material usage on the 0.5-acre parcel or adjacent properties. The nearest contamination cases are closed cases that are located to the east at the Caltrans facility and the Trinity Valley Elementary School. The site survey revealed no evidence of buried storage tanks or soil contamination. There was no indication that the parcel has previously been used for an industrial purpose.

9 e) The project site is not within an airport land use plan or within two miles of a public airport or public use airport. The nearest airstrip or airport is the Hoopa Airport, which is 13 miles to the north. There is no impact from airport conflicts.

9 f) The project will not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, because the project does not involve the construction of barriers such as walls or buildings. Although construction of the water pipeline will require a single land closure, the other traffic lane will stay open, and the duration is a few days or weeks.

9 g) The Project site is located within a state responsibility area and is within an area designated "very high fire hazard severity" (California Department of Forestry and Fire Protection, 2020). The surrounding national forestlands are in a Federal Responsibility Area. However, existing laws, such as requirements for maintenance of defensible space around structures, would reduce potential wildfire risks. The project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires. No new buildings are proposed that house humans. There is no increased risk for wildfire due to operation of the proposed project. To the contrary, the proposed project will increase water storage capacity, which increases the water available to fight fires. Adherence with existing regulations and best management practices, such as requirements for maintenance of defensible space, the use of spark arrestors, and implementation of a construction fire safety plan, would mitigate any fire risk. Implementation of the proposed projects will have a less than significant impact upon the risk of wildfire.

MITIGATION

No mitigation is required.

10. HYDROLOGY AND WATER QUALITY

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

DISCUSSION

10 a) The Project Area is in the Willow Creek subwatershed, which is in the Campbell Creek-Trinity River Watershed (HUC 12-digit code180102111206). The project area is located within the Water Quality Control Plan for the North Coast Region (Basin Plan). The Basin Plan establishes water quality objectives. The entire project area has upland features and contains no channels or wetlands (i.e., no jurisdictional waters of the United States). Thus, Project construction cannot directly impact any surface water bodies. To address potential indirect impacts to receiving water bodies from pollution during construction of the proposed project, an erosion control plan and spill control plan will be implemented. Operation of the project does not produce waste discharge. Implementation of the proposed project will have a less than significant impact upon water quality.

10 b) The proposed project involves the storage of water that derives from groundwater. The proposed storage tank adds additional capacity and flexibility in the storage of groundwater. Such storage may allow the groundwater wells to be pumped less, which would allow better management of the aquifer. The proposed tank addresses current deficiencies in storage demand and is not being constructed for future growth of service subscribers. There will be no impacts to groundwater resources.

10 c) Implementation of the proposed project will not alter drainage patterns because grading will occur over only a small area and perimeter drainage ditches and velocity dissipation devices will be constructed. The project area is not in a floodplain. To address potential indirect impacts to receiving water bodies from pollution during construction of the proposed project, an erosion control plan and spill control plan will be implemented. The area of disturbance from project implementation is anticipated to be less than 1 acre. For any project that disturbs 1 acre or more, the project proponent must enroll under the SWRCB's

Construction General Permit prior to the initiation of construction. In conjunction with enrollment under this Permit, a SWPPP, Erosion Control Plan, and a Hazardous Materials Management/Spill Response Plan must be created and implemented during construction to avoid or minimize the potential for erosion, sedimentation, or accidental release of hazardous materials. The proposed project will have a less than significant impact upon drainage patterns.

10 d) The project will not be impacted by seiche or tsunami because the project is not adjacent to any body of water that has the potential of seiche or tsunami. The project site is not near the ocean or on a steeply sloped hill. According to the FEMA Flood Insurance Rate Map, the Project Area is in Flood Zone X, an "area of minimal flood hazard." The proposed project will not use hazardous materials or any pollutants which could risk release into the environment. Implementation of the proposed project will have no impact on the environment from inundation from flooding, seiche, or tsunami.

10 e) For surface water, the project area is located within the Water Quality Control Plan for the North Coast Region (Basin Plan). The Basin Plan establishes water quality objectives. The US Environmental Protection Agency established two technical Total Maximum Daily Loads for sediment in the Trinity River watershed. Water quality will be protected from sediment during construction by implementation of an erosion control plan during construction. In the operational phase, the project will not discharge any water or pollutants. The project area is not in an area that is part of a groundwater management plan. The project is not within an area designated by the USEPA as a sole source aquifer (USEPA, 2019). There will be no impacts to groundwater resources as the project will not increase groundwater withdrawal. Implementation of the proposed project will have no impact upon water quality plans.

MITIGATION

No mitigation is required.

11. LAND USE AND PLANNING

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

DISCUSSION

The parcel has the General Plan land use designation of RA5-20 Rural Residential Agriculture and is zoned AG-B-5(10) Agricultural General-Special Building Site. The project is not within a coastal zone.

11 a,b) The project will not physically divide an established community because the project does not involve the construction of barriers, such as new roads, and because no one will be displaced from their homes. The proposed project is the improvement of an existing, permitted water supply that is compliant with all applicable land use policies and regulations of the County Code and General Plan. Therefore, the project will have no impact upon land use and planning.

MITIGATION

No mitigation is required.

12. MINERAL RESOURCES

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

DISCUSSION

12 a, b) The Surface Mining and Reclamation Act requires that local jurisdictions enact planning procedures to guide mineral conservation and extraction at particular sites and to incorporate mineral resource management policies into their general plans. On this basis, it is presumed that counties would, as needed and as applicable, encourage the conservation (i.e., protection from incompatible land uses) of areas designated as having substantial potential for mineral extraction and discourage development that would substantially preclude the future development of mining facilities in these areas. The potential for the extraction of substantial mineral resources from lands classified by the State as areas that contain mineral resources (Mineral Resource Zone [MRZ]-3) would be considered by counties at a local level when making land use decisions. For these reasons, no significant impacts are anticipated related to the availability or use of a known, valuable mineral resource, either at a program level or cumulatively.

The following Mineral Lands Classification data portal was queried on January 15, 2019:

- The Surface Mining and Reclamation Act Mineral Lands Classification data portal is a geographic information system provided by the Department of Conservation through data maintained by the California Geological Survey. This data portal provides online access to environmental data at the Internet address (URL) = http://maps.conservation.ca.gov/cgs/informationwarehouse/.

The Mineral Lands Classification database does not designate the Project Area or the vicinity as a mineral resource zone. The nearest mineral resource are aggregate materials (river gravels and sand) in the Trinity River corridor. The Project would have **no impact** upon mineral resources.

MITIGATION

No mitigation is required.

13. NOISE

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

DISCUSSION

13 a, b) The project area is not adjacent to any noise-sensitive land uses (residential, daycare, school, medical, etc.). Existing noise sources consist of vehicular traffic along Highway 299 and Highway 96. Construction of the proposed project will generate temporary noise from the operation of heavy equipment and from vehicles that deliver materials or worker commutes. However, the duration of construction is just a few weeks. Furthermore, the construction contractor will comply with local noise ordinances that limit noise to acceptable times of the day. No blasting is necessary. Ground vibrations from heavy machinery will be generated, but could only be felt within a few hundred yards of the project area; there is no human occupancy / residences this close to the construction area. Therefore, construction and operation of the proposed project will have a less than significant noise or vibration impact.

MITIGATION

No mitigation is required.

14. POPULATION AND HOUSING

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

DISCUSSION

14 a,b) Willow Creek CSD currently provides water to approximately 936 service connections. The population served varies in age, household income, and ethnicity; the total population is approximately 1,710. The project will not induce population growth in the area either directly or indirectly. The project is not proposing any new residential development and the project will not significantly expand water infrastructure which might stimulate population growth. The project will not involve the removal of housing. Implementation of the proposed projects will have no impact upon population growth or people or housing.

MITIGATION

No mitigation is required.

15. PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☐	☒
ii) Police protection?	☐	☐	☐	☒
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

DISCUSSION

15 a i-v) Willow Creek Community Services District is the local, elected government for the community of Willow Creek and provides water services, park services, recreation facilities, street lighting, and is actively involved in the creation of a commercial area wastewater system. The Proposed Project would not induce growth or otherwise substantially increase demand for public services. The project is simply the improvement of an existing water supply. Therefore, there would be **no impact** to public services.

MITIGATION

No mitigation is required.

16. RECREATION

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

DISCUSSION

16 a-b) The parks closest to the Project Area are Boise Creek Campground, several thousand feet to the west, and Veterans Park, several thousand feet to the east. The Trinity River itself is a recreational facility: Big Rock Day Use Area & River Access is the nearest access point. The Proposed Project would not involve parks or recreational facilities. The proposed project would not have any potential to cause or accelerate physical deterioration of recreational facilities, or include or require construction, expansion, or increased use of such facilities. The Proposed Project would have no impact upon recreation resources.

MITIGATION

No mitigation is required.

17. TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian paths?	☐	☐	☐	☐
b) For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?	☐	☐	☐	☐
c) For a transportation project, would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)?	☐	☐	☐	☐
d) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☒	☐

DISCUSSION

17 a-e) The tank-portion of the Project Area is accessed by a private, unpaved single-lane driveway off of Brannan Mountain Road. In the vicinity of the Project, Brannan Mountain Road is a 2-lane paved road. Brannan Mountain Road is used to access the national forest lands and private residential inholdings and becomes a gravel surface road deeper into the forest. Most regional eastbound and westbound traffic utilizes State Route 299, and northbound and southbound traffic uses State Route 96; both are a 2-lane paved roads. These roads currently operate at acceptable Levels of Service.

Construction of the proposed project is not anticipated to generate substantial numbers of vehicle trips. The daily trip estimate is 4 to 8 roundtrips per day with pickup trucks and equipment operators for up to two months, and 1 roundtrip per day for a concrete truck for 2 to 4 days and the same for material delivery. This low number of total trips resulting from construction will not lower the Level of Service on any roadway. The proposed project does not propose any new development, construction or physical change to the environment that would directly or indirectly result in any impacts to on-ground transportation and traffic, including emergency access. The driveway for the tank has sufficient room for emergency vehicle access and turnaround. Construction of the proposed waterline will result in a single lane closure for several days. Even during lane closure, the other lane can be used by emergency vehicles and public traffic. There will be a less than significant impact to circulation systems and emergency access.

MITIGATION

No mitigation is required.

18. TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

DISCUSSION

Consultation Pursuant to AB 52

In 2015, the Legislature passed Assembly Bill (AB) 52 and the Governor signed it into law. The statute amended CEQA to establish tribal consultation procedures for evaluation of potential effects to tribal cultural resources. To initiate the AB 52 consultation process, tribes must submit a written request to a lead agency to be informed through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe (PRC Section 21080.3.1[b]). No requests for consultation under the requirements of AB 52 have been received.

18 a, i, ii, c) No requests, in writing pursuant to AB 52, from geographically affiliated tribes for consultation under the requirements of AB 52 regarding the potential of the project to impact tribal cultural resources have been received prior to the date of this document. Therefore, no tribal cultural resources have been identified on the project site and the project would have **no impact**. No mitigation measures for tribal cultural resources are required.

MITIGATION

No mitigation is required.

19. UTILITIES AND SERVICE SYSTEMS

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

DISCUSSION

19 a-f) Willow Creek Community Services District is the local, elected government for the community of Willow Creek and provides water services, park services, recreation facilities, street lighting, and is actively involved in the creation of a commercial area wastewater system. The source of the District's drinking water is groundwater wells in Willow Creek. The Proposed Project is the installation of a water storage tank to improve storage capacity for an existing water supply system. The Proposed Project would not significantly expand the water supply system such that it induced growth because the proposed storage tank is addressing only current deficiencies in the system, and is not designed for new service hookups. The Proposed Project does not involve any public wastewater or stormwater treatment services, natural gas, or telecommunications facilities, although electricity is used to pressurize the water system and draw water from the wells. No significant quantities of solid waste would be generated by the Proposed Project. The Project will comply with all local, state, and federal regulations regarding solid waste. Therefore, the Proposed Project will have a less than significant impact upon utilities and service systems.

MITIGATION

No mitigation is required.

20. WILDFIRE

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

DISCUSSION

20 a-d) The Public Resources Code includes fire safety regulations that apply to fire hazard areas during the time of year designated as having hazardous fire conditions. During the fire hazard season, these regulations restrict the use of equipment that may produce a spark or fire, require the use of spark arrestors on engines, and specify fire-suppression equipment that must be provided on-site for various types of work in fire-prone areas. Public Resources Code section 4291 provides that a person who maintains a building or structure on land that is covered with flammable material shall at all times maintain defensible space.

The project area is a mixture of forest and ruderal habitats, and wildfire fuels are present. Fire breaks exist in the form of roads. Electrical service installations for project implementation are permitted and inspected by the County. The Project site is located within a state responsibility area and is within an area designated "very high fire hazard severity" (California Department of Forestry and Fire Protection, 2020). The surrounding national forestlands are in a Federal Responsibility Area. However, existing laws, such as requirements for maintenance of defensible space around structures, would reduce potential wildfire risks. The project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires. No new buildings are proposed that house humans. There is no increased risk for wildfire due to operation of the proposed project. To the contrary, the proposed project will increase water storage capacity, which increases the water available to fight fires. Adherence with existing regulations and best management practices, such as requirements for maintenance of defensible space, the use of spark arrestors, and implementation of a construction fire safety plan, would mitigate fire risks. Implementation of the proposed projects will have a less than significant impact upon the risk of wildfire. The combination of these existing regulations and protective measures would reduce fire risk to a less-than-significant level.

MITIGATION

No mitigation is required.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
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)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

DISCUSSION

21 a) Environmental Quality. The Project would not 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, or threaten to eliminate a plant or animal community. The Project would not impact rare or endangered wildlife species, or eliminate important examples of the major periods of California history or prehistory.

21 b, c) Cumulative Impacts and Adverse Effects on Human Beings. The Project would not result in adverse impacts that are individually limited but cumulatively considerable and would not involve substantial adverse effects on human beings, either directly or indirectly. All of these potential effects would be less than significant with implementation of mitigation measures identified in this document and would not contribute in considerable levels to cumulative impacts.

REFERENCES CITED

California Air Pollution Control Officers Association. 2017. CalEEMod® California Emissions Estimator Model User's Guide, Version 2016.3.2. November 2017. Prepared for California Air Pollution Control Officers Association. Prepared by BREEZE Software, a division of Trinity Consultants, in collaboration with South Coast Air Quality Management District and other California Air Districts.

California Air Resources Board. 2020. California county, Air Basin, and Districts (CoAbDis): California Air Resources Board, Sacramento, California. Available at: https://www.arb.ca.gov/ei/gislib/gislib.htm.

California Department of Conservation. 2020. Farmland Mapping and Monitoring Program: CA Department of Conservation, Sacramento, California. Available at: ftp://ftp.consrv.ca.gov/pub/dlrp/fmmp

California Department of Conservation. 2020. Williamson Act: CA Department of Conservation, Sacramento, California. Available at: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/

California Department of Conservation. 2020. California Geological Survey Information Warehouse Regulatory Maps: C California Department of Conservation, Sacramento, California. Available at: http://maps.conservation.ca.gov/cgs/informationwarehouse/

California Department of Conservation. 2020. California Geological Survey Landslide Maps. Available at: http://maps.conservation.ca.gov/cgs/informationwarehouse/.

California Department of Fish and Wildlife. 2020. Conservation Plan Boundaries, HCP and NCCP: CA Department of Fish and Wildlife, Sacramento, California. Available at: https://map.dfg.ca.gov/metadata/ds0760.html

California Department of Fish and Wildlife. 2020. RareFind, California Natural Diversity Data Base. Sacramento, California. GIS database updated by subscription.

California Department of Forestry and Fire Protection. 2020. California Fire Hazard Severity Zone Map Update Project.
Internet database at: http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_maps

California Department of Conservation, 2020. California Geological Survey Landslide Maps. The Willow Creek Quadrangle: Special Report 195. Landslides in the Highway 299 Corridor Between Blue Lake and Willow Creek, Humboldt County, California. Author: J.N. Falls, C.J. Wills and B.C. Hardin. Year: 2006. Scale: 1:12,000.

California Department of Toxic Substances Control. 2020. EnviroStor Database Website. Available on the Internet at: http://www.envirostor.dtsc.ca.gov/public/.

California Geological Survey. 2020. Surface Mining and Reclamation Act's Mineral Lands Classification data portal. Available at: http://maps.conservation.ca.gov/cgs/informationwarehouse/.

Durham, David L. 1998. California's Geographic Names: A Gazetteer of Historic and Modern Names of the State. Clovis, California: Word Dancer Press.

Federal Emergency Management Agency. 2020. FEMA National Flood Hazard Layer (NFHL): Federal Emergency Management Agency, Washington, DC. Available at: https://hazards.fema.gov/femaportal/wps/portal/NFHLWMS

Fredrickson, David A. 1974. Cultural Diversity in Early California: A View from the North Coast Ranges. Journal of California Anthropology 1:41–54.

Fredrickson, David A. 1984. The North Coast Region. In California Archaeology, edited by M.J. Moratto, pp. 471-527.

Jennings, C.W., R.G. Strand, and T.H. Rogers. 1977. Geologic Map of California: Division of Mines and Geology, Geologic Data Map Series Map No. 2, 1:750,000 scale.

Natural Resources Conservation Service. 2020. Soil Data Mart. State Soil Survey Geographic data sets (SSURGO and STATSGO). National Cooperative Soil Survey. NRCS Soils Website. Internet database and digital maps available at http://soildatamart.nrcs.usda.gov/.

Sacramento Metropolitan Air Quality Management District. 2015. CEQA Guide to Air Quality Assessment. Chapter 2 Environmental Review: Thresholds of Significance. Available on the Internet at http://www.airquality.org/ceqa/cequguideupdate/Ch6ghgFINAL.pdf.

State Water Resources Control Board. 2020. GeoTracker Database Website. Available on the Internet at: http://geotracker.swrcb.ca.gov/.

United States Environmental Protection Agency. 2020. Drinking Water Sole Source Aquifer Program. Map of Sole Source Aquifer Locations, Internet database at https://www.epa.gov/dwssa/map-sole-source-aquifer-locations.

United States Environmental Protection Agency. 2020. National Ambient Air Quality Standards (40 CFR part 50) NAAQS Table (ppm). Available on the Internet at https://www.epa.gov/criteria-air-pollutants/naaqs-table

United States Environmental Protection Agency. 2020. Federal de minimis levels. Available on the Internet at: https://www.epa.gov/general-conformity/de-minimis-tables.

U.S. Fish and Wildlife Service. 2020a. National Wetlands Inventory: U.S. Fish & Wildlife Service, Madison, Wisconsin. Available at: https://www.fws.gov/wetlands/nwi/Staff.html

U.S. Fish and Wildlife Service. 2020b. National Wild and Scenic Rivers System: U.S. Fish and Wildlife Service, Burbank, Washington. Available at: https://www.rivers.gov/mapping-gis.php

U.S. Fish and Wildlife Service. 2020c. Threatened & Endangered Species Active Critical Habitat Report. Environmental Conservation Online System. Available at: https://ecos.fws.gov/ecp/report/table/critical-habitat.html.

U.S. Geological Survey. 2006. Quaternary Fault and Fold Database of the United States: U.S. Geological Survey, Reston, Virginia. Available at: https://earthquake.usgs.gov/hazards/qfaults/

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EXHIBITS

APPENDICES

APPENDIX 1. AIR QUALITY ASSESSMENT

Natural Investigations Co., Inc. 2020. Air Quality Impact Assessment for the Brannan Mountain Water Storage Tank Project, Willow Creek, California. 97 pp.

APPENDIX 2. BIOLOGICAL RESOURCES ASSESSMENT

Natural Investigations Co., Inc. 2019. Biological Assessment for the Willow Creek Community Services District Tank Replacement Project, Willow Creek, California. Prepared for California Rural Water Association. 43 pp.