

Lost Coast Headlands Management Area: Public Access and Recreation

Mitigation Monitoring and Reporting Program *California State Coastal Conservancy*

1.0 INTRODUCTION

This Mitigation Monitoring and Reporting Program (“the Program”) has been developed for the Lost Coast Headlands Management Area Public Access and Recreation project approved by the Coastal Conservancy on October 2, 2014, in conjunction with adoption of a corresponding federal Finding of No Significant Impact (“FONSI”) consistent with the California Environmental Quality Act (“CEQA”). The Program will be implemented by the federal Bureau of Land Management (“BLM”).

CEQA Guidelines § 15221 encourages state agencies to utilize environmental documents prepared under the National Environmental Policy Act (“NEPA”) where, as in the case of the Lost Coast Headlands project, the NEPA document for a proposed project is prepared before an otherwise-required CEQA document and meets CEQA Guidelines requirements. Since NEPA does not require imposition of mitigation measures, a state agency utilizing a NEPA document must add a discussion of any such measures. CEQA Guidelines § 15097 requires a state agency imposing mitigation measures to adopt a program for mitigation monitoring or reporting. This Mitigation Monitoring and Reporting Program is intended to ensure implementation of mitigation measures for avoiding potential environmental impacts resulting from the project, as discussed in the NEPA Environmental Assessment (“EA”) and FONSI prepared by BLM, a federal agency.

The Lost Coast Headlands Management Area is owned by BLM and managed for public access and recreation including hiking, horseback riding, picnicking and wildlife viewing. BLM has prepared a management plan for the area to enhance and construct recreation amenities. In compliance with the National Environmental Policy Act (“NEPA”), BLM prepared an Environmental Assessment (“EA”) to evaluate potential impacts from the recreation improvements. Consistent with CEQA Guidelines § 15225, the Conservancy, as lead agency under CEQA, is using BLM NEPA EA for CEQA purposes to evaluate potential environmental impacts under CEQA.

The mitigation measures for this project address potential impacts to the environment from hazardous materials, soil erosion and disturbance, greenhouse gases, and fire, as well as the potential impacts to cultural resources, wildlife, vegetation and livestock grazing.

Mitigation Measures

Hazardous Materials

The former Centerville Beach Naval Facility consisted of an operations building located west of Centerville Road and military housing, a mess hall, recreation facilities, an automotive shop, a potable water treatment facility, a hazardous materials storage area, and a gatehouse, all of which were located east of Centerville Road. Moderate amounts of chemicals were spilled as a result of the operations. Under direction of the California Department of Toxic Substances Control, the U.S. Navy thoroughly investigated the site and remediated all identified chemical spills prior to acquisition by BLM. Although it is believed that there is no remaining residual pollution associated with former Navy operations, there remains a slight possibility that chemicals may still be present in deeper soils at the site.

Mitigation Measures: To account for the possibility that residual pollutants may be inadvertently encountered, BLM will review documents in the administrative record for Centerville Beach Naval Facility prior to conducting any excavations deeper than two feet to determine proximity to sites where spills are known or suspected to have occurred. Prior to excavating areas where residual pollutants may be encountered, a hazardous materials specialist will be consulted to determine whether soil sampling or other special precautions should be taken. If warranted at that time, BLM will develop a specific plan for controlling or avoiding exposure to potential hazardous materials prior to deeper excavation during construction.

Soil Erosion and Disturbance

Minor surface erosion or soil disturbances exist from routine use at Fleener Creek and Guthrie Creek trails and parking areas. Continued use of these amenities would result in localized areas of surface erosion. Installation of the steps at the base of the Guthrie Creek Trail could result in excavated soil entering Guthrie Creek. Additional minor surface erosion could result from construction of the new trail and parking area amenities at Centerville Bluffs East, and from reconfiguring the county-owned Centerville Road to accommodate safe ingress and egress to the new facilities.

Expanded grazing (by lease on BLM lands) could result in soil disturbance, erosion and compaction that would be most prevalent during wet periods, from gathering near natural water sources, and in and around gates or other features that constrict cattle movement. The soil types present in the area are noted for their ability to withstand grazing and while comparison of adjacent areas suggests that the proposed grazing would result in minor erosion, widespread impacts to soils and erosion are not anticipated.

Mitigation Measures: The proposed upgrades of the trails such as installing rolling dips, resurfacing the trails and parking areas with small gravel, and installation of permanent steps at the west end of Guthrie Creek trail, would serve to minimize rates of erosion. During the installation of steps at the base of Guthrie Creek Trail, if work occurs adjacent to the creek, a temporary berm shall be in place to prevent soil from entering the creek. The excavated soils will be used to backfill new steps.

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Installation of new split rail fencing at the Guthrie Creek trail parking area will further reduce potential for surface erosion by preventing unauthorized driving outside of the parking area.

Reducing the parking lot size at the existing Fleener Creek trailhead to approximately one-half of its current size would reduce the extent of vehicle ground disturbance and resultant potential erosion and runoff over the bluff edge.

The proposed parking lot at Centerville Bluffs East would be located on existing asphalt surface. Thus, no additional ground disturbance is anticipated with the parking lot. Placement of picnic tables and new restroom may result in very minor soil disturbance. However, the flat topography where these amenities would be placed would limit potential erosion.

Widening Centerville Road would result in soil displacement and additional surface prone to surface erosion near the road edge. But increased maintenance during trailhead and parking-lot maintenance would reduce erosion and runoff.

The proposed construction will take place during the dry season, thus further reducing erosion from these activities.

Also, the proposed grazing would occur in the relatively flat uplands, thus reducing the risk of increased erosion. Through its grazing-lease program, BLM employs a grazing allotment management plan process that provides for ongoing monitoring and adaptation. Should site conditions change that result in increased erosion, changes in the grazing strategy would be implemented to address and correct unwanted or unfavorable effects from grazing.

Greenhouse Gases

It is possible that construction, site maintenance or operations could contribute to small amounts of greenhouse gas emissions. Actions that could contribute to greenhouse gas emissions include (ongoing) livestock grazing, operation of equipment involved in mechanical vegetation management, combustion of slash piles, and operation of equipment used for trail construction and facilities development and maintenance. Additionally, cessation of carbon sequestration by removed non-native conifers would occur.

Short-term carbon release and emissions from combustion of fuel wood resulting from potential public fuel wood permits would occur. But long-term continuation of carbon dioxide sequestration through maintenance of perennial grasslands and open space would persist. Following implementation of the project, where minimal soil disturbance would occur, grasslands and retained conifers would persist and grow, providing long-term, advantageous carbon sequestration.

Mitigation Measures: To minimize greenhouse gas emissions, BLM will utilize hand tools where feasible and will employ best management practices (“BMPs”) when using mechanized or heavy equipment such as backhoes, trucks, and vegetation cutters and chippers. Idling times will be minimized, equipment will be maintained in good working order, and the carrying capacity of trucks for materials supply and waste hauling will be maximized to reduce to the extent practicable the number of trips to the site.

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To minimize loss of carbon sequestering grasslands and trees and shrubs, BLM will remove unsafe and over-aged conifers, while maintaining to the extent practicable trees that do not interfere with recreation activities or facilities construction. Further, BLM will encourage long-term grassland growth through active grazing management to reduce overgrazing.

Fire

An increase in recreation use has the potential to result in an increase in fires and damage caused by misuse of fire restrictions and fuels in and around the Centerville Bluffs East picnic area.

Mitigation Measures: In order to reduce the possibility of fires, BLM has incorporated into its management plan rules prohibiting users from having open campfires, requiring vegetation to be cleared around allowed designated cooking areas in the picnic area, and allowing fires only in cooking grills and only outside of the active fire season.

Cultural Resources

No cultural deposits eligible for, or listed on, the National Register of Historic Places have been located within the proposed construction areas, and there are no known cultural resources in the project area. Even so, it is possible that subsurface cultural deposits are present that could be disturbed during excavation and soil disturbing activities.

Mitigation measure: Prior to any surface disturbing activities associated with construction, BLM will engage a qualified archaeological technician to monitor all ground-disturbing activities. Any exposed cultural materials will be examined by the BLM Arcata Field Office prior to any further disturbance. BLM will conduct a site-specific cultural survey in the immediate location to identify any additional potential archaeological/cultural sites or artifacts.

If any cultural materials, sites, or properties should be discovered, a qualified archaeologist will evaluate the finds and appropriate protection measures consistent with the requirements of 14 California Code of Regulations § 1504.5(f) will be taken, if necessary. In the event that any human remains are encountered or in the event that unassociated funerary objects, or grave goods are discovered, work in the immediate vicinity of the discovery, other than non-disturbing documentation, shall cease and BLM shall comply with applicable State laws (14 California Code of Regulations § 15064.5(e), Health & Safety Code § 75050.5, and Public Resources Code § 5097.98), Native American Graves Protection and Repatriation Act (NAGPRA) as outlined at 43 CFR 10 and, Archaeological Resources Protection Act (ARPA) at 43 CFR 7.

Wildlife

Additional developed recreation sites resulting from the project would increase the number of visitors using the area resulting in increased human-wildlife interaction and subjecting wildlife to more frequent low-level disturbance. Maintaining the picnic area, trails and existing parking areas with mowers, trimmers, and chainsaws, for example,

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would also cause low-level disturbance. Heavy equipment used to develop the recreation sites would cause a more intense, localized impact on wildlife during construction.

Mitigation Measures: To minimize potential disturbance to wildlife from direct interaction with humans, BLM has incorporated split rail fencing into its existing sites upgrades and low profile wire fencing in new construction plans to prevent off-road vehicle access and to direct users to established trails or intended hiking areas.

Maintenance and construction activities will be conducted in concentrated periods to minimize the duration of wildlife disturbances. However, emergency repairs to protect public safety will be conducted when necessary, but will be scheduled where practicable to reduce impacts.

Replacing existing chain-link boundary fences with split-rail fencing, or other low profile fencing will reduce impediments to wildlife movement, resulting in a net benefit to wildlife. Installation of dog-barrier fences near grazing pastures would prevent dogs from passing onto adjoining private property. These fences could impede movement of wildlife other than deer. However, the sections of dog-barrier fences would cause only minor detours for wildlife as the fences are not more than 0.5 mile in length.

Vegetation

There would be minor, but long-term impact to a small footprint where trails, and facilities such as picnic tables, kiosks/signs and restrooms, would be developed. Additional short-term transitory trampling of vegetation would occur by the use of equipment employed during construction.

There would be a long-term impact from the proposed invasive tree removal. There would be short-term transitory impacts to grassland vegetation associated with equipment used to remove the trees and through future activities to control the return of invasive trees.

Mitigation Measures: Prior to conducting ground disturbing activities, a qualified BLM botanist will conduct a seasonally appropriate reconnaissance of the footprint of the proposed disturbance area to determine if any of the plant species of concern listed in Exhibit A are present. If any of these plants are found within the area proposed for disturbance, BLM will avoid the plants and coordinate with California Department of Fish and Wildlife. If necessary, BLM will relocate the placement of the access and recreation improvements.

To reduce the impacts to grasslands and other desirable vegetation from heavy equipment for vegetation removal and management activities, BLM will, where feasible, use existing paved areas to access work sites. Much of the upgrade work on Fleener and Guthrie Creek trails will be conducted by hand, and will not require the use of heavy equipment to access the work areas.

Installation of the proposed parking area at Centerville Bluffs East would not result in removal of vegetation as an existing paved area will be used.

While the removal of invasive trees is intended to be permanent, there would be a net benefit to native grassland habitat by not being ecologically displaced by the encroaching

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non-native trees. Impacts to the grasslands from trampling by equipment are expected to be short-term and temporary as they are expected to recover naturally.

A net benefit to grasslands and other non-invasive vegetation would result from reducing the Fleener Creek parking area to one-half its current size, thus allowing shrubs and grasses to re-grow.

Livestock Grazing

The potential exists for conflicts between the public and livestock grazing activities at the proposed Centerville Bluffs East picnic area and connecting ADA-compliant trail to the Fleener Creek Overlook. The potential exists for damage to grazing improvements that could result in livestock trespass or for harassment or injury to livestock from unleashed dogs.

Mitigation Measures: If damage to grazing improvements occur and cattle trespass onto the trail BLM may reduce the cattle grazing area to allow for safe trail access. If cattle are harassed or injured by unleashed dogs, BLM may either temporarily close the trail during livestock use, or remove livestock to allow undisturbed year-round ADA access to the trail. BLM will conduct monitoring to determine which management solution to employ.

Monitoring and Reporting

Lead BLM staff shall monitor the activities proposed under the project and carried out by contractors, California Conservation Corps trail team, and other BLM staff. Work shall not commence without lead BLM staff present to observe and monitor construction and vegetation removal.

The State Coastal Conservancy is the lead state agent under CEQA and as such has developed this plan to accompany the EA prepared by BLM. As the landowner and manager, BLM shall implement the measures above as required. Following each construction season, and at the completion of the project, BLM shall report to the Conservancy in writing as to the measures taken during the project and their success.

Lost Coast Headlands MMRP Exhibit A

Scientific_Name_CNPS	CommonName_CNPS	RarePlantRank_CNPS	FederalStatus_RareFind	OtherStatus_RareFind
Carex leptalea	bristle-stalked sedge	2B.2	None	
Carex praticola	northern meadow sedge	2B.2	None	
Carex saliniformis	deceiving sedge	1B.2	None	
Castilleja mendocinensis	Mendocino Coast paintbrush	1B.2	None	BLM_S-Sensitive
Coptis laciniata	Oregon goldthread	2B.2	None	
Empetrum nigrum	black crowberry	2B.2	None	
Erigeron supplex	supple daisy	1B.2	None	
Erysimum concinnum	bluff wallflower	1B.2	None	
Erythronium oregonum	giant fawn lily	2B.2	None	
Gilia capitata ssp. pacifica	Pacific gilia	1B.2	None	
Glyceria grandis	American manna grass	2B.3	None	
Lathyrus palustris	marsh pea	2B.2	None	
Lilium maritimum	coast lily	1B.1	None	
Lilium occidentale	western lily	1B.1	Endangered	
Mitellastra caulescens	leafy-stemmed mitrewort	4.2	None	
Montia howellii	Howell's montia	2B.2	None	USFS_S-Sensitive
Oenothera wolfii	Wolf's evening-primrose	1B.1	None	BLM_S-Sensitive
Polemonium carneum	Oregon polemonium	2B.2	None	
Puccinellia pumila	dwarf alkali grass	2B.2	None	
Sidalcea malachroides	maple-leaved checkerbloom	4.2	None	
Sidalcea malviflora ssp. patula	Siskiyou checkerbloom	1B.2	None	BLM_S-Sensitive
Sidalcea oregana ssp. eximia	coast checkerbloom	1B.2	None	BLM_S-Sensitive