

COASTAL CONSERVANCY

Staff Recommendation
April 6, 2023

POINT SAINT GEORGE COASTAL TRAIL DESIGN AND PERMITTING

Project No. 05-048-02
Project Manager: Joel Gerwein

RECOMMENDED ACTION: Authorization to disburse up to \$309,650 to the Smith River Alliance to prepare final designs, permit applications, and plans for interpretive elements for the Point Saint George Coastal Trail Project, which consists of construction of approximately 1.25 miles of coastal trail, resource protection, interpretive content, and improvements to the main trailhead parking area at Point Saint George in Del Norte County, and adoption of findings under the California Environmental Quality Act.

LOCATION: Point Saint George near Crescent City, Del Norte County

EXHIBITS

- Exhibit 1: [Project Location Map](#)
 - Exhibit 2: [Project Designs](#)
 - Exhibit 3: [Point St. George Management Area Trail and Parking Lot Project Initial Study-Mitigated Negative Declaration and Mitigation, Monitoring and Reporting Program](#)
 - Exhibit 4: [Site photographs](#)
 - Exhibit 5: [Project Letters](#)
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RESOLUTION AND FINDINGS

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed three hundred nine thousand six hundred and fifty dollars (\$309,650) to the Smith River Alliance (“the grantee”) to prepare final designs, permit applications, and plans for interpretive elements for the Point Saint George Coastal Trail Project, which consists of construction of approximately

1.25 miles of coastal trail, resource protection, interpretive content, and improvements to the main trailhead parking area at Point Saint George in Del Norte County (Exhibits 1 and 2).

Prior to commencement of the project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:

1. A detailed work program, schedule, and budget.
2. Names and qualifications of any contractors to be retained in carrying out the project.

In addition, to the extent appropriate, the grantee shall incorporate the guidelines of the Conservancy's 'Coastal Access Project Standards'.

Findings:

Based on the accompanying staff recommendation and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 9 of Division 21 of the Public Resources Code, regarding public access.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria.
3. The Smith River Alliance is a nonprofit organization organized under section 501(c)(3) of the U.S. Internal Revenue Code.
4. The Conservancy has independently reviewed and considered the Point St. George Management Area Trail and Parking Lot Project Initial Study-Mitigated Negative Declaration adopted by the County of Del Norte on May 1, 2013 pursuant to the California Environmental Quality Act ("CEQA") and attached to the accompanying staff recommendation as Exhibit 3. The Conservancy finds that the proposed project as designed and mitigated avoids, reduces, or mitigates the potentially significant environmental effects to a less-than-significant level, and that there is no substantial evidence based on the record as a whole that the project may have a significant effect on the environment, as defined in 14 Cal. Code Regulations Section 15382.

STAFF RECOMMENDATION

PROJECT SUMMARY:

Staff recommends the Conservancy authorize a grant of up to \$309,650 to the Smith River Alliance (SRA) to prepare final designs, permit applications, and plans for interpretive elements for the Point Saint George Coastal Trail Project, which consists of construction of approximately 1.25 miles of coastal trail, resource protection, interpretive content, and improvements to the main trailhead parking area at Point Saint George in Del Norte County (Exhibits 1 and 2). This work will facilitate project implementation, which will fill a gap in the California Coastal Trail, protect sensitive resources, improve public safety, and provide amenities at a natural area that is an important open space destination for tourists and the local community. The project is

essential to protect the resources of the site and to improve public access to the 339-acre Point Saint George property that was purchased in part with Conservancy funds in 2002.

When constructed, the Point Saint George Coastal Trail project will provide multiple benefits. It will fill a gap in the coastal trail, providing a continuous reach of coastal trail from Pebble Beach, located two miles to the south, to the mouth of the Smith River, located approximately 11 miles to the north (Exhibit 1). Approximately 0.4 miles of the new trail will be accessible to people who use wheelchairs or have reduced mobility. The project will reduce impacts from informal trails on sensitive natural resources by closing those trails and designating one formal trail in their place, and will protect sensitive cultural resources by capping sites that are currently being exposed through erosion. It will reduce unsafe use of the parking area after hours. Currently, the parking area is a large open area that is ungated and is frequently used in the middle of the night for reckless driving (doing donuts and speeding). The project designs will include a gate, limiting the use of the site to dawn to dusk hours, and will also demarcate a one-way route of travel and add a speed table and curbs, which will reduce opportunities for reckless driving. The designs will include a restroom and picnic area. Additionally, it will also provide interpretive content, allowing visitors to learn about the cultural significance of the site to the Tolowa Dee-Ni' Nation, as well as the site's recent history and natural resources.

The project will implement priority management actions identified in the 2004 Point St. George Management Plan, which was adopted by the County of Del Norte and by the Conservancy. The Plan was prepared collaboratively by the County of Del Norte, Conservancy, California State Parks, the California Department of Fish and Wildlife (CDFW), the Tolowa Dee-Ni' Nation, and the Elk Valley Rancheria, with input from local residents. The Plan identified the need to balance public use with the protection of cultural and natural resources, and prioritized designating the coastal trail alignment, providing parking and an accessible trail to an overlook for wheelchair users, protecting cultural sites, and preparing interpretive materials, all of which will be implemented by the project.

The agencies and tribes that worked together to prepare the 2004 Point Saint George Management Plan have continued to collaborate on the trail and parking lot design through the Point Saint George Working Group, and SRA will partner with the working group on the permitting and final design work. As part of the proposed project, the Tolowa Dee-Ni' Nation will work with State Parks to plan interpretive elements for the site. Opportunities will also be provided for the general public to provide input during this final design stage.

Permitting and final design components of the proposed project include preparation of 1) 95% designs and a construction bid package for the trail, parking lot, restrooms, and picnic area, and 2) permit applications to the US Army Corps of Engineers (USACE), the North Coast Regional Water Quality Control Board, and the California Coastal Commission, along with needed technical studies to accompany these permit applications. A wetland delineation was conducted in 2013, but the delineation will be updated to ensure that it reflects current conditions. A botanical survey called for in the IS-MND will be conducted. In addition, the US Fish and Wildlife Service (USFWS) will be consulted to determine if studies regarding potential impacts to the Oregon Silverspot butterfly are necessary. The Oregon silverspot is designated as threatened under the federal Endangered Species Act, and Point Saint George is identified in

USFWS's 2020 Five Year Species Review as a potential site to establish a new population, pending further study of whether conditions would be suitable.

Planning and environmental compliance for this project was initiated in 2010, and significant progress was made with trail design and environmental compliance at that time. However, the project did not move forward to implementation, because adequate funding could not be secured and appropriate wetland mitigation could not be identified for the small area of wetland impacts anticipated from the trail (see CEQA section below for further discussion of potential wetland impacts). These issues have now been addressed. Funding for implementation is expected to come from California State Parks, Wildlife Conservation Board, and the Conservancy. The County has indicated it would allow wetland mitigation to occur through removal of roads through wetlands at Pacific Shores adjacent to Lake Earl.

Site Description: Point Saint George is a scenic windswept headland located just northwest of Crescent City in Del Norte County, approximately fifteen miles south of the California-Oregon border. Del Norte is California's northernmost county, with a population of just under 30,000 people, most of whom reside in the Crescent City area. Acquired by the County in 2002 in part with Coastal Conservancy funds, the 339-acre coastal terrace with its steep cliffs, offshore sea stacks, and crashing surf is increasingly appreciated and used by local people and Redwood Coast visitors. A small private inholding consisting of a primary residence and several small structures exists within the Point Saint George property just west of the principal parking lot at the terminus of Radio Road (Exhibit 1).

The prominence of Point Saint George on the northwest coast was not lost on the indigenous people of the area, the Tolowa tribe. For centuries before the arrival of Europeans, ancestors of the present-day Tolowa made use of the headland. Archaeological surveys and radiocarbon dating of artifacts suggest that the site was used since roughly 310 B.C., placing it among the earliest occupied sites in the region.

The dramatic interaction of the ocean and rocky shore is exceptional at Point Saint George. The headland's steep bluffs drop to rocky pocket beaches and intertidal shelves, some accessible by trail, others enclosed by towering cliffs and sea. The coastal terrace itself features a vast panorama: to the north, across Pelican Bay and its lonely expanse of sandy beach, lie the coastal mountains of southern Oregon; to the west, six miles offshore on the seemingly open sea, is the Saint George Reef Light Station, a critical beacon for navigation since 1892; to the south are Castle Rock, the biggest coastal island north of the Farallon Islands, the many sea stacks offshore of Crescent City's Pebble Beach, and the forested cliffs of the Redwood Coast; and to the east, the forests and snowy peaks of California's Siskiyou Mountains. Inland and to the east of the bluffs, the land slopes gently to the southeast with the lowest elevations being in the vicinity of the airport. This area contains a large depression that collects water during the rainy season and slowly dries as the seasonal drought proceeds. Among the several unusual plant species found here is the increasingly rare western lily, one of several species that benefit from periodic management to control competitive vegetation that in former times was grazed by wild animals and burned by indigenous people. A 1991 survey found the Oregon silverspot butterfly, the Yontocket ringlet butterfly, the Wolf's evening primrose, the black crowberry, and the Artic starflower, all rare species. The rocky coast snail and the sand dune phacelia were

found in adjacent habitats on Point Saint George. Over 100 different bird species have been sighted at Point Saint George.

Grant Applicant Qualifications: SRA was incorporated in 1980, and its mission is to provide for the long-term protection, restoration and stewardship of natural resources within the Smith River watershed. SRA has successfully managed multiple grants from the Conservancy, including grants for restoration of watershed lands, restoration planning and permitting, fish barrier removal, and conservation land acquisition. SRA is thus well qualified to undertake the work proposed in this authorization.

CONSISTENCY WITH CONSERVANCY’S PROJECT SELECTION CRITERIA:

The proposed project is consistent with the Conservancy’s Project Selection Criteria, last updated on September 23, 2021, in the following respects:

Selection Criteria

1. Extent to which the project helps the Conservancy accomplish the objectives in the Strategic Plan.

See the “Consistency with Conservancy’s Strategic Plan” section below.

2. Project is a good investment of state resources.

This project involves a reasonable expenditure of funds to complete feasible permitting and design work that will facilitate the implementation of the Point Saint George Coastal Trail project, which when constructed will provide multiple benefits for the public, including improved public access, new coastal trail, reduced impacts on natural and cultural resources, and improved public safety (See Criterion 5 below).

The project budget is based on estimates from several consultants and from similar past projects, and leverages partnerships and staff time between multiple state and local agencies and tribes.

The proposed project is generally consistent with several state plans, and specifically with the following:

Statewide Comprehensive Outdoor Recreation Plan 2021-2025: This State Parks Plan includes the following priorities that will be furthered by the project: 1) Create new park access; 2) Include safety and beautification enhancements to make new or existing parks appear welcoming; and 3) Build recreation features that are designed to support healthy lifestyles in new or existing parks.

Pathways to 30x30: The 2022 plan includes the following priorities that will be furthered by the project: 1) Incorporate programming, education, outreach, and engagement that is accessible and representative of California’s cultural diversity; and 2) Increase access points and trails within existing natural areas including coastal areas and urban rivers.

3. Project includes a serious effort to engage tribes. Examples of tribal engagement include good faith, documented efforts to work with tribes traditionally and culturally affiliated to the project area.

Planning for Point Saint George management has involved collaboration with the Tolowa Dee-Ni' Nation and the Elk Valley Rancheria since the property was acquired by the County in 2002. The Tolowa Dee-Ni' Nation and the Elk Valley Rancheria are represented on the Point Saint George Working Group. The Tolowa Dee-Ni' Nation will receive a portion of the proposed funding to pay for tribal staff and member time to develop interpretive content for the site. The Elk Valley Rancheria was also offered funding to participate in the planning project but are currently prioritizing work on other projects.

In addition, the project will facilitate the protection of cultural resources at the site which are currently threatened by exposure and disturbance due to erosion. The Tolowa Dee-Ni' Nation and the Elk Valley Rancheria helped design the protection for these cultural resources.

When the project is implemented, tribal monitors will be present during ground disturbance.

4. Project benefits will be sustainable or resilient over the project lifespan.

This project is a design and permitting project, which will facilitate the implementation of the Point Saint George Coastal Trail Project. The trail, parking area, and associated amenities are expected to be resilient to climate change over at least fifty years. The primary threat to these improvements would be bluff retreat. A bluff retreat technical memo was prepared in 2013 for the study area, which concluded that the bluffs in the project area will not be undercut by rising sea levels due to the resistant nature of bedrock materials in the lower bluff face. In addition, wave energy in the project area is dissipated by offshore sea stacks. Bluff erosion in the study area is expected to occur primarily by top-down erosion due to surface runoff, which can be managed to mitigate any erosion problems.

5. Project delivers multiple benefits and significant positive impact.

This project when constructed will provide multiple benefits with significant positive impact for the public:

- Improved public access, including for people who use wheelchairs, and new amenities at a popular location for coastal recreation which receives over 220,000 visitors annually. Visitor numbers are expected to increase as the North Coast increasingly becomes a refuge from wildfire smoke and extreme heat in inland areas.
- 1.25 miles of new coastal trail, creating a 14-mile continuous reach of coastal trail from Pebble Beach to the south to the mouth of the Smith River to the north.
- Reduced impacts on sensitive natural and cultural resources (see project description above)
- Improved public safety by reducing unsafe use of the parking area after hours.

- Interpretive content will increase public awareness of the Tolowa culture and connection to the land.

6. Project planned with meaningful community engagement and broad community support.

This project will help implement the 2004 Point Saint George Management Plan. Development of the 2004 plan was overseen by the Point Saint George Management Plan Steering Committee and included two public meetings to solicit community input. The steering committee included representatives of the Tolowa Dee-Ni' Nation, the Elk Valley Rancheria, USFWS, the Conservancy, CDFW, State Parks, the Del Norte County Board of Supervisors, the Del Norte County Historical Society, the North Coast Regional Land Trust, and the agricultural community. Public participation in conjunction with Steering Committee guidance was an important element in the planning process, involving visioning early in the planning process and comments on the draft plan later in the process. This project will provide further opportunities for community engagement, at a County Board of Supervisors meeting and a public community meeting.

PROJECT FINANCING

Coastal Conservancy	\$309,650
Project Total	\$309,650

Conservancy funding is anticipated to come from a Fiscal Year 2022/23 appropriation from the General Fund to the Conservancy for the purpose of climate resilience. (Budget Act 2022, SB 154). These funds are available as described in Section 52 of Chapter 258 of the Statutes of 2021, which sets forth a detailed description of the purposes of the climate resilience funds, including nonmotorized trails of statewide significance. The proposed project is consistent with this funding source because it will plan a section of the California Coastal Trail that will close a significant gap in the trail, which is a nonmotorized trail of statewide significance.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The proposed project is consistent with Chapter 9 of Division 21 of the Public Resources Code (Sections 31400-31410), regarding public access and enjoyment of coastal resources. Section 31400 states that the Conservancy shall have a principal role in the implementation of a system of public accessways to and along the state's coastline. Through the proposed project, the Conservancy will help enhance a coastal accessway and thereby further access to and enjoyment of coastal resources along the Del Norte County shoreline.

Section 31400.1 allows the Conservancy to award grants to a non-profit organization for development of accessways to and along the coast that serve more than local public needs. The proposed project will plan a segment of the California Coastal Trail at a popular location that serves visitors from throughout the state. Del Norte County and the Point Saint George attract hundreds of thousands of visitors per year.

Section 31400.2 requires the Conservancy to consider a number of factors in determining the amount of funds to provide for the initial development of a public accessway. Consistent with

this section, the proposed level of funding was evaluated relative to the total amount of funding available to the Conservancy for coastal access projects, the fiscal resources of the applicant, and the Conservancy's project selection criteria (see Consistency with Conservancy's Project Selection Criteria & Guidelines). Implementation of the trail project is expected to be funded by State Parks and other sources, along with a potential future Conservancy grant; however, SRA and other partners do not have sufficient funds available to complete the design and permitting without assistance.

Section 31400.3 authorizes the Conservancy to assist nonprofit organizations in developing and implementing a system of public accessways to and along the state's coastline. The proposed project will further these goals by planning a trail and associated improvements in a heavily visited coastal region.

Section 31408 authorizes the Conservancy to coordinate the development of the California Coastal Trail in consultation with State Parks, the California Coastal Commission, and Caltrans. The project is consistent with this section, as it involves final design and permitting for a section of the Coastal Trail in coordination with State Parks and the Coastal Commission. The alignment of the Coastal Trail through this section has already been agreed to by all the responsible agencies, and Caltrans is not directly involved as this section is a pedestrian trail located on State Parks and County property.

CONSISTENCY WITH CONSERVANCY'S [2023-2027 STRATEGIC PLAN](#) GOAL(S) & OBJECTIVE(S):

Consistent with **Goal 2, Objective 2**, the proposed project will plan a storytelling installation that presents communities and voices historically excluded or under-represented by developing interpretive content with the Tolowa Dee-Ni' Nation that incorporates Tolowa culture and connection to the site.

Consistent with **Goal 2, Objective 3**, the proposed project will plan an accessibility project that reduces barriers to coastal access for people with disabilities by completing design and engineering for an accessible section of the California Coastal Trail with accessible trailhead parking and amenities.

Consistent with **Goal 2, Objective 4**, the proposed project will facilitate the construction of a section of the California Coastal Trail.

Consistent with **Goal 2, Objective 5**, the proposed project will facilitate the construction of recreational amenities including restrooms, parking, and picnic areas.

CEQA COMPLIANCE:

Conservancy staff has reviewed the Point Saint George Management Area Trail and Parking Lot Project Initial Study-Mitigated Negative Declaration (MND) adopted by the County of Del Norte on May 1, 2013. Since preparation of the MND, the project has not changed, no new circumstances have occurred, nor has any new information been identified requiring new analysis or verification.

Potential significant impacts of the project are discussed below.

Air Quality

Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed California or National Air Quality Standards. Ground disturbance and burning of slash during trail construction activities could result in emissions of particulate matter less than 10 microns in size (PM-10). The North Coast Unified Air Quality Management District's (NCUAQMD) Air Basin, which includes the project area, is not in attainment of federal and state standards for PM-10, so any new emission of these pollutants could be a significant impact. This impact will be mitigated to a less than significant level by the implementation of Mitigation Measure 1.

Mitigation Measure 1. The project will implement measures to reduce PM-10 emissions including but not limited to: 1) covering open-bodied trucks when used for transporting materials likely to give rise to airborne dust; 2) earth or other material that has been transported by trucking or earth moving equipment, erosion by water, or other means onto paved streets shall be promptly removed; 3) obtaining a burn permit; and 4) complying with NCUAQMD regulations regarding allowable burn days.

Biological Resources

Impact BIO-1: Impacts to Special Status Species. Ground disturbance and future trail use may directly impact special status plant species that have been documented in the project vicinity, including short-leaved evax, seacoast ragwort, sand dune phacelia, and Siskiyou checkerbloom. Ground disturbance may impact the Oregon silverspot butterfly, which is federally listed as threatened under the Endangered Species Act. Habitat for this butterfly is present in the project area, but the butterfly has not been documented there in the last 25 years. Construction could impact nesting migratory birds. This impact will be mitigated to a less than significant level by the implementation of Mitigation Measures 2-5 below.

Mitigation Measure 2: Botanical surveys will be conducted to map the occurrences of special status plant species. These occurrences will be avoided if feasible and protected during construction with temporary fencing. If avoidance is not feasible, a mitigation and monitoring plan will be prepared and implemented after review and approval by CDFW. Mitigation will involve relocation of special status plants that would otherwise be impacted by construction, monitoring, and replanting as necessary to achieve success criteria.

Mitigation Measure No. 3: Annual monitoring of special-status species and natural communities shall be conducted for a 5-year period following construction of each trail segment. If there is evidence of an adverse impact, permanent fencing shall be considered and implemented, as necessary.

Mitigation Measure No. 4: A USFWS-approved biologist shall conduct four surveys during a single year for the Oregon silverspot butterfly between July 15 and August 25, with at least three surveys during the average peak flight period of July 25 to August 20. Each survey shall be separated from other surveys by at least six days. If any Oregon silverspot butterflies are

detected, a mitigation plan will be developed and implemented with the review and approval of the USFWS.

Mitigation Measure No. 5: To avoid impacts to nesting birds and/or raptors, one of the following will be implemented. Either:

1) conduct vegetation removal and other ground disturbance activities associated with construction during mid-August through January, when birds are not nesting; **or**
2) conduct pre-construction surveys for nesting birds if vegetation removal or ground disturbing activity is to take place during the nesting season (February 1 to August 31 for most birds). If an active nest is located during the preconstruction surveys, CDFW and/or USFWS shall be notified, as appropriate to the species and its status. If an active nest is found within the zone of influence (within 300 feet of the limits of work), grading and construction shall be prohibited within an adequate setback, as approved by a qualified biologist in consultation with CDFW. Work within the setback will have to be delayed until after the young have fledged, as determined during surveys by a qualified biologist.

Impact BIO-2: Impacts to sensitive natural communities. Ground disturbance, pedestrian traffic, and the potential introduction of invasive plants due to construction have the potential to adversely impact shore pine forest, dune mat, and Pacific reedgrass meadows in the project area. This impact will be mitigated to a less than significant level by the implementation of Mitigation Measure 6 below.

Mitigation Measure No. 6: The potential for introduction and spread of noxious weeds shall be minimized as follows:

- A. Use only certified weed-free erosion control materials, mulch, and seed.
- B. Preclude the use of rice straw in riparian areas.
- C. Limit any import or export of fill to material known to be weed free.
- D. Require the construction contractor to wash all equipment thoroughly at a commercial wash facility before entering the County. If the equipment has most recently been used within the County, cleaning is not required.

Impact BIO-3: Impacts to wetlands. Construction may result in temporary and permanent impacts to wetlands. Potential temporary impacts to USACE jurisdictional wetlands total 0.11 acres, and potential temporary impacts to additional California Coastal Commission jurisdictional wetlands total 0.12 acres. Potential permanent impacts to USACE jurisdictional wetlands also total 0.11 acres, and potential permanent impacts to additional California Coastal Commission jurisdictional wetlands total 0.24 acres. This impact will be mitigated to a less than significant level by the implementation of Mitigation Measure 7 below.

Mitigation Measure No. 7: The conceptual wetland mitigation and monitoring program will be implemented. The County of Del Norte shall submit for review and written approval of the permitting agencies (USACE, NCUAQCB, CDFW, and California Coastal Commission) a final detailed compensatory wetlands mitigation and monitoring program designed by a qualified wetland biologist for the construction and monitoring of compensatory wetlands mitigation

site(s). The final detailed compensatory wetlands mitigation and monitoring program shall include provisions for the creation or restoration of a minimum area based on the functions and values assessed.

Cultural Resources

Impact CUL-1: Impacts to archaeological resources. Construction of the proposed trail at Point St. George has the potential to disturb archaeological site resources, either directly (physical damage by construction and unauthorized collection or excavation) or through erosion within the trail corridor over time. Ground disturbance may result in accidental discovery and disturbance of cultural resources or artifacts. These impacts will be mitigated to a less than significant level by the implementation of Mitigation Measures 8-11 below.

Mitigation Measure No. 8: Design trail to minimize impacts to archaeological resources. If the trail goes through any portion of a cultural resource, site protection shall be undertaken through construction of boardwalks or the use of gravel or wood chips to cover the trail bed. No excavation of the trail into native soil shall occur in these areas. Since any excavation within known site boundaries represents an adverse impact to the site, no signs or other trail markers shall be installed within recorded site boundaries.

Mitigation Measure No. 9: Construction of viewing platform(s). To lessen the potential for erosion of archaeological sites caused by visitor use and foot traffic, a viewing platform shall be constructed wherever the trail enters a site. The platforms shall be prefabricated and placed on top of sterile fill at the crest of the dune. The trail to such platforms shall be filled with gravel or wood chips to prevent additional erosion.

Mitigation Measure No. 10: The Elk River Rancheria and Smith River Rancheria will be on site during all ground disturbing activities. Forty-eight hour notice shall be provided prior to any ground disturbing activity. If cultural resources are encountered during construction operations, Mitigation Measure No. 11 shall be implemented to the satisfaction of local tribal interests, Native American Heritage Commission (NAHC), and the County. The costs incurred for the cultural monitor during construction operations are the responsibility of the County.

Mitigation Measure No. 11: If cultural resources, such as chipped or ground stone or bone are discovered during ground-disturbance activities, work shall be stopped within 20 meters of the discovery. Work near the archaeological finds shall not resume until a professional archaeologist who meets the Secretary of the Interior's Standards and Guidelines and appropriate tribal representatives have evaluated the materials and offered recommendations for further action.

Impact CUL-2: Disturbance of human remains. The project is not expected to disturb any human remains, including those interred outside of formal cemeteries. However, there is potential for human remains to be accidentally disturbed during construction. This impact will

be mitigated to a less than significant level by the implementation of Mitigation Measure 12 below.

Mitigation Measure No. 12: If human remains are discovered during project construction, work will stop at the discovery location, within 20 meters, and any nearby area reasonably suspected to overlie human remains. The Del Norte County coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it will be necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC. The coroner will contact the NAHC. The descendants or most likely descendants of the deceased will be contacted, and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods. Work may resume if NAHC is unable to identify a descendant or the descendant failed to make a recommendation.

Hazards and Hazardous Materials

Impact HAZ-1: Impacts from use of or accidental spills of hazardous materials. The project could result in spills of hazardous materials such as petroleum hydrocarbons, fuels, and lubricants in mechanized construction equipment. This impact will be mitigated to a less than significant level by the implementation of Mitigation Measure 13 below.

Mitigation Measure No. 13: In order to reduce the potential of accidental release of regulated materials, a spill prevention control and countermeasure plan (SPCC Plan) will be developed and implemented throughout construction. As part of the SPCC Plan, absorbent materials will be stored on site and all jobsite employees will be properly trained to deal with hazardous material spills in the event of an accidental release. All fueling will be conducted in designated areas.

Hydrology and Water Quality

Impact WQ-1: Degradation of water quality that could violate water quality standards. Ground disturbance associated with the project could result in erosion and fine sediment influx into stormwater that could degrade water quality. This impact will be mitigated to a less than significant level by the implementation of Mitigation Measure 14 below.

Mitigation Measure No. 14: Compliance with the general permit for construction and land disturbance activities (NPDES Permit No. CAS000002, Order No. 2009-0009-DWQ) is required by the State of California. In the event project activities qualify for an exemption, implementation of the erosion and sediment control plan is required to reduce potential impacts associated with water quality to a less than significant level. The applicant shall ensure that no construction materials, debris, or waste be placed or stored where it may be subject to dispersion by storm water. Any and all debris resulting from construction activities shall be immediately removed following completion of construction; concrete trucks and tools used for construction shall be rinsed at the specified wash out area(s); and staging and storage of

construction machinery and storage of debris shall not take place on any public street rights-of-way. Best management practices (BMPs) will ensure that any surface water runoff commingling with potential storm water contaminants will be minimized and prevented from entering storm water infrastructure.

Noise

Impact NOISE-1: Exposure of people to excessive noise. Noises generated by the proposed project will result in a temporary noise increase during construction. The proposed project will require the use of heavy equipment (excavator and backhoe) during construction. Residents of the house in the project vicinity could be impacted by construction noise. This impact will be mitigated to a less than significant level by the implementation of Mitigation Measure 15 below.

Mitigation Measure No. 15: Hours of construction activities shall be limited to daylight hours, Monday through Saturday, from 6:00 a.m. to 6:00 p.m., with no work conducted during federal or state holidays unless prior approval is given by the County of Del Norte.

Staff has independently evaluated the Point St. George Management Area Trail and Parking Lot Project Initial Study-Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP) adopted by the County of Del Norte on May 1, 2013, and concurs that there is no substantial evidence that the proposed project will have a significant effect on the environment. Staff therefore recommends that the Conservancy find that the project as mitigated avoids, reduces, or mitigates the possible significant environmental effects to a level of less-than-significant and that there is no substantial evidence that the project will have a significant effect on the environment as that term is defined by 14 Cal. Code Regs. §15382.

Upon approval of the project, Conservancy staff will file a Notice of Determination.