

COASTAL CONSERVANCY

Staff Recommendation

October 2, 2014

LOST COAST HEADLANDS MANAGEMENT AREA: PUBLIC ACCESS AND RECREATION

Project No. 14-034-01

Project Manager: Su Corbaley

RECOMMENDED ACTION: Authorization to disburse up to \$357,500 to the United States Department of the Interior, Bureau of Land Management, to construct public access improvements in the Lost Coast Headlands Management Area, Humboldt County; adoption of a federal Finding of No Significant Impact for the project, consistent with the California Environmental Quality Act.

LOCATION: Lost Coast Headlands, six miles southwest of the town of Ferndale, Humboldt County (Exhibit 1)

PROGRAM CATEGORY: Public Access

EXHIBITS

- Exhibit 1: [Project Location and Site Map](#)
- Exhibit 2: [Lost Coast Headlands Activity Plan/NEPA Finding of No Significant Impact](#)
- Exhibit 3: [Mitigation Monitoring and Reporting Program](#)
- Exhibit 4: [Photographs](#)
- Exhibit 5: [Project Letters](#)
- Exhibit 6: [CEQA Notice of Intent to Use NEPA Document](#)

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31400 *et seq.* of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes disbursement of an amount not to exceed three hundred fifty-seven thousand five hundred dollars (\$357,500) to the United States Bureau of Land Management (“the grantee”) to implement portions of the Lost Coast Headlands Activity Plan and develop public access in the Lost Coast Headlands Management Area; and, consistent with the California Environmental Quality Act (“CEQA”), adopts the federal Finding of No Significant Impact, attached as Exhibit 2 to the accompanying staff

recommendation, as well as the Mitigation Monitoring and Reporting Program, attached as Exhibit 3 to the accompanying staff recommendation. This authorization is subject to the following conditions:

1. Prior to disbursement of any funds, the Executive Officer shall approve in writing a work plan, budget and schedule, detailed project designs, and any contractors to be used for the activities under this authorization.
2. With respect to work funded by the Conservancy and constituting an improvement or development, the grantee shall provide evidence that all permits and approvals necessary to this project have been issued.
3. Conservancy funding shall be acknowledged by erecting and maintaining on the property a sign or signs that have been reviewed and approved by the Executive Officer.”

Staff further recommends that the Conservancy adopt the following findings:

“Based on the accompanying staff report 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 to and along the coast.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. Consistent with the California Environmental Quality Act, the Conservancy has independently considered BLM’s Environmental Assessment and Finding of No Significant Impact for the project, attached as Exhibit 2 to the accompanying staff recommendation, as well as comments received, and finds on the basis of the whole record that there is no substantial evidence that the proposed project as mitigated will have a significant effect on the environment.”

PROJECT SUMMARY:

Staff is recommending that the Conservancy authorize the disbursement of up to \$357,500 to the Bureau of Land Management (“BLM”) to construct public access improvements at its Lost Coast Headlands Management Area (“management area”). The primary goals of this project are to upgrade existing recreational facilities such as beach access trails and parking areas, and to develop new recreational opportunities by constructing a picnic area and wheelchair accessible trail at Centerville Bluffs East.

The project area is located approximately 25 miles south of Eureka and 4 miles south of the mouth of the Eel River at the northern end of California’s famed Lost Coast, in an area that provides a quiet, coastal experience with breathtaking bluffs and ocean views. The management area comprises 463 acres owned and managed by BLM. It includes portions of the Fleener Creek and Guthrie Creek watersheds that were acquired in part with Conservancy funding, and the former naval base property known as Centerville Bluffs East, decommissioned in the mid-1990s and transferred to BLM in 2010) (Exhibit 1).

The proposed project involves safety, erosion-control and facilities upgrades to two existing trails and trailheads, and the development of a new picnic and recreation area, and an Americans with Disabilities Act (“ADA”) compliant trail and overlook. The two existing trails provide the visiting public with access from the bluffs along Centerville Road to the beach and coastline. The Guthrie Creek Trail, which is approximately one mile in length and meanders down the hill to the mouth of Guthrie Creek, accommodates pedestrian and equestrian users. The Fleener Creek Trail, a one half-mile trail that traverses the hillside down to the mouth of Fleener Creek, is designed for pedestrian use only.

Since the trails were installed – Guthrie in 2001 and Fleener in 2008 – annual visitor counts have increased from none to approximately 1500. However, due to the terrain, neither trail provides ADA-suitable recreation opportunities. Nor does either trailhead provide expanded amenities such as group picnic facilities, larger horse-trailer parking, open (flat-land) hiking, or large group recreation opportunities. The extreme coastal weather conditions have caused the trails to degrade in places. Consequently, the trails have eroded and the lower half of Guthrie Creek Trail washes out seasonally, causing concerns over safety; if allowed to progress, this could result in partial or whole trail closure. The Guthrie Creek parking is small and, though it can accommodate one horse trailer, there is limited turning space. The Fleener Creek parking lot is oversized, which attracts rowdy driving behavior resulting in spinouts and rutting of the parking lot. The proposed project would enable BLM to provide ADA access to the bluffs, correct trail erosion and address the safety concerns to keep the trails open year round, thereby reducing annual maintenance costs and improving services.

Prior to 2001, when BLM acquired its first property in the headlands, there was no public coastal access as all of the land was either privately owned or military run, and off-limits. Since then, BLM has acquired the six parcels that presently constitute the management area and has developed trails to the beach at Guthrie Creek and Fleener Creek. Following its most recent acquisition in 2010 of the naval base, BLM completed a comprehensive planning effort to address management of the entire 463 acres, resulting in the 2013 Lost Coast Headlands Management Area Activity Plan (“Plan”) (Exhibit 2). The Plan describes the need for improvements and presents the access improvements proposed for the project.

This proposed authorization would enable BLM to complete the access improvements outlined in the Plan. The activities expected to be completed include:

- Developing new Centerville Bluffs East parking lot and installing amenities including a picnic area, permanent restroom and security gate
- Developing an ADA-compliant trail from the Centerville Bluffs parking area to Fleener Creek trailhead
- Removing old and overhanging Monterey Pines and eucalyptus at the new Centerville Bluffs East picnic area and along the proposed ADA trail route for safety
- Replacing the unattractive, decrepit cyclone boundary fencing with low rise split rail and or wire fencing and removing unneeded grazing pasture fencing
- Upgrading the Fleener Creek trail for erosion control and trail bed leveling, reconfiguring the Fleener Creek parking area, removing the temporary restroom and installing an ADA-compliant scenic overlook
- Installing 45 steps at the bottom of the Guthrie Creek trail and upgrading the Guthrie Creek trail head with a permanent restroom and a reconfigured parking area
- Developing and installing interpretive panels and materials to provide learning

opportunities for schools and community groups

All of the work on the existing trails is expected to be completed by hand or with some (hand-held) mechanical compaction. Work at Centerville Bluff East would involve the use of a small bobcat sized backhoe, tree removal equipment, post diggers, and hand construction of fences and the overlook.

An added benefit of the proposed project would be the potential to develop a segment of the California Coastal Trail (“the CCT”) which is currently undefined in this area. The Conservancy report entitled “Completing the California Coastal Trail” recommends working with private landowners to acquire public rights at several locations from Centerville Beach to the north to Cape Mendocino to the south. If the CCT were to be established in this area through additional acquisitions of public rights, the ADA trail proposed between Centerville Bluffs East and Fleener Creek ADA overlook would serve as the CCT. The trails to both Guthrie Creek and Fleener Creek would constitute spur trails of the CCT.

BLM is a federal public agency with a large presence in Humboldt County, managing land for a wide variety of recreational opportunities and protection of open space. The Conservancy has worked with BLM on many successful projects in Humboldt County, including, among others, the acquisitions of the Lost Coast Headlands properties, and access improvements on the North Spit of Humboldt Bay. As owner and manager of the Lost Coast Headlands Management Area, and due to its successful track record in implementing this type of project, BLM is the appropriate grantee for this project.

Site Description: The 463-acre Lost Coast Headlands Management Area is located along the coastal bluffs south of the mouth of the Eel River and at the northern point of California’s Lost Coast, a place of rolling mountains and windswept coastal bluffs crumbling onto narrow beaches. The area is hard to beat if you are looking for quiet recreational pursuits.

The coastal bluffs that comprise the management area consist mostly of grasslands with scattered patches of forest. The beach along the base of the bluffs is narrow and typically not passable except during very low tides. The exposed cliffs facing the ocean are rich in fossils and provide an exceptional opportunity for geologic research and beachcombing. Several locations along the bluffs are actively eroding into the ocean. See photos in Exhibit 4.

The project area consists of several habitat types including open sandy beaches, steep coastal bluffs, coastal streams and ponds, coastal scrub, and open grasslands. BLM surveyed the management area in 2010 and 2011 for wildlife and plant species. Wildlife species include the black tailed deer, grey fox, mountain lion, coyote, raccoon, brush rabbit, pocket gopher, and other species associated with coastal prairies. Bird species include, among others, the red-tailed hawk, northern harrier, turkey vulture, common raven, and California quail. Gulls and other shorebirds use the beach for roosting and foraging, during low tide when the beach is exposed. One threatened species, the Northern California steelhead Distinct Population Unit, was found to occur within the area at Guthrie Creek. BLM consulted with U.S. Fish and Wildlife Service and the National Marine Fisheries Service and determined the population would not be affected by the project. The southern boundary of the Western snowy plover critical habitat unit is approximately 0.5 miles north of the management area. The beaches beneath the bluffs in the Lost Coast Headlands Management Area are not suitable habitat for nesting Western snowy plovers but may contain foraging areas at low tide.

LOST COAST HEADLANDS MANAGEMENT AREA: PUBLIC ACCESS AND RECREATION

The surveys did not find any special status plants in within the management area.

The project area includes the existing Fleener Creek Trail, the existing Guthrie Creek Trail, and Centerville Bluffs East, as discussed in Exhibit 2. Prior to BLM ownership, the lands were managed for livestock grazing except for the northern 32-acre parcel which was formerly the Centerville Beach Naval Facility. Under a Memorandum of Understanding with BLM, the U.S. Navy removed the buildings and facilitated cleanup of the naval property to make it suitable for public use, but did not provide funding for necessary public access facilities to open the site for public use.

Project History: In February 2000, the Conservancy authorized a grant of \$15,000 to The Conservation Fund to undertake a feasibility study to evaluate opportunities for protecting coastal resource lands, providing new public coastal access, and preserving coastal agriculture on the coast west of the town of Ferndale. One of the recommendations from that study included the acquisition of the ranchlands that now make up the Lost Coast Headlands Management Area owned by BLM. Following that study and acting upon that recommendation, the Conservancy has assisted in the acquisition and subsequent transfer from The Conservation Fund to BLM of much of the management area, as follows.

In April 2001, the Conservancy authorized a grant of \$1,008,000 for the acquisition of the 225-acre Lost Coast Ranch. In July 2001, the Lost Coast Ranch was transferred to BLM and opened for beach access via Guthrie Creek Trail.

In December 2001, the Conservancy granted an additional \$962,000 for the acquisition of 180 acres of the Barri Ranch, located immediately north of the Lost Coast Ranch, which was transferred to BLM in 2003. In 2005, BLM completed the planning and environmental review for the improvements at Fleener Creek, and in 2006 constructed the parking area at the top of the bluff. In 2007, the Conservancy granted approximately \$60,000 to BLM for constructing the nearly Fleener Creek Trail to complete the trail and facilities project begun with BLM funding in 2005.

Following the transfer from the Navy to BLM of the Centerville Bluffs East property in 2010, BLM completed its comprehensive management planning that identified new recreational amenities and access needs at the property, and determined areas needing improvement at the existing trails and trailheads. In 2013, BLM approached Conservancy staff for funding to fully develop public access in the management area.

This project is consistent with previous efforts and will achieve the Conservancy's and BLM's goals of opening this property for public access while protecting natural and scenic resources, and its agricultural use.

PROJECT FINANCING

Coastal Conservancy	\$357,500
BLM	\$75,000
CCC	\$12,750
Project Total	\$445,250

The Conservancy's contribution to this project is expected to come from the FY 2014/15 appropriation from the Safe Neighborhoods, Parks, Clean Water, Clean Air and Coastal Protection Bond Fund (Proposition 12) allocated for resource development projects north of the Gualala River. The proposed project is consistent with this funding source as it will result in new public access facilities on the Humboldt County coast.

In addition to the \$75,000 committed for implementation, BLM has already expended approximately \$224,000 for planning, design and permitting of the Lost Coast Headlands Management Area improvements. BLM will contribute approximately \$60,000 annually through management and maintenance.

Additionally, Humboldt State University and Fortuna High School will donate classroom/teacher/student time valued at \$9,000 and \$3,000, respectively, to develop interpretive and classroom educational materials.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The proposed project would be undertaken pursuant to Chapter 9 (Sections 31400 *et seq.*) of Division 21 of the Public Resources Code, regarding public access to the coast. Section 31400 states the Legislature's intent that the Conservancy have a principal role in the implementation of a system of public accessways to and along the state's coastline. The goal of the proposed project is to keep viable existing trails, develop varied public coastal recreation, and construct a new ADA trail and overlook that would provide public access to and along the coast. The proposed funding authorization is thus consistent with § 31400.

Section 31400.1 allows the Conservancy to award grants to public agencies to develop, operate, or manage lands for public access purposes to and along the coast. BLM is a public agency that will carry out this project with the purpose of developing public access to and along the coast. BLM anticipates that current annual visitor counts are approximately 1,500; with the expansion of access and recreation at Centerville Bluffs East, those numbers are expected to increase. Thus, this project is consistent with § 31400.1.

Section 31400.2 allows the Conservancy to fund up to the total cost of the initial development of public accessways by public agencies. The Conservancy will contribute 80 percent of the funds for the project, and BLM and CCC will contribute a combined 20 percent.

Section 31400.3 allows the Conservancy to aid public agencies in establishing a system of public coastal accessways. BLM, which will carry out the proposed project, is a public agency having among its principal purposes providing public recreation opportunities. The proposed funding authorization thus meets the requirement of § 31400.3.

The proposed project is also consistent with § 31408(a), directing the Conservancy to coordinate the development of the California Coastal Trail, and § 31409, which authorizes the Conservancy to award grants and provide assistance to establish and expand inland trail systems that may be linked to the California Coastal Trail. The trails scheduled for upgrades and that planned for construction between Centerville Bluffs East and Fleener Creek overlook could become part of the California Coastal Trail between Centerville Beach and Cape Mendocino.

CONSISTENCY WITH CONSERVANCY'S 2013 STRATEGIC PLAN GOAL(S) & OBJECTIVE(S):

Consistent with **Goal 2 Objective A** of the Conservancy's 2013-2018 Strategic Plan, the proposed project will expand opportunities for barrier-free access to and along the coast and coastal trails.

Consistent with Goal 2 Objective B of the Conservancy's 2013-2018 Strategic Plan, the proposed project will open a coastal area that is currently closed to public use.

Consistent with **Goal 2 Objective D** of the Conservancy's 2013-2018 Strategic Plan, the proposed project will fund construction of new trails and reconstruction of parking areas and trailheads to increase and enhance coastal recreation opportunities.

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA & GUIDELINES:

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines, last updated on November 10, 2011, in the following respects:

Required Criteria

1. **Promotion of the Conservancy's statutory programs and purposes:** See the "Consistency with Conservancy's Enabling Legislation" section above.
2. **Consistency with purposes of the funding source:** See the "Project Financing" section above.
3. **Support of the public:** The project, having been through a complete public review process conducted by BLM, has the support of the public at large and the Humboldt County Board of Supervisors (Exhibit 5).
4. **Location:** The proposed project is located within the coastal zone of Humboldt County. The proposed project will facilitate increased public access to the Lost Coast Headlands Management Area, and provide a wide variety of coastal recreation experiences.
5. **Need:** BLM has invested approximately \$224,000 into planning and development for the Lost Coast Headlands Management Area, readying the area for the project. Conservancy funds are necessary for BLM to complete the access improvements and upgrades to make the area safe and accessible and provide different levels of coastal recreation that are not available now.
6. **Greater-than-local interest:** Humboldt County draws hundreds of thousands of visitors annually, many specifically to visit its magnificent coastline. As discussed above, the Lost Coast Headlands trails currently accommodate approximately 1500 visitors annually; opening Centerville Bluffs East would provide a wider variety of recreation options that would attract additional regional or out of state visitors.
7. **Sea level rise vulnerability:** Sea level rise impacts in the form of flooding or inundation will not have a large effect on the project area. Rising seas combined with increased storm surges and intensity could result in accelerated coastal bluff erosion. Modeling the effects of rising sea levels on coastal cliff erosion, Phillip Williams and Associates (2009) found that cliffs could retreat on the order of 60 to 260 meters by the year 2100 (0.7 to 3.2 yards per year). However, the report emphasizes that these are coarse estimates based on large scale mapping

products. Regardless of the extent of coastal retreat, ongoing land sliding and coastal erosion presents a significant threat to the existing uplands and further land losses are likely from land sliding. Except for a short segment of the Guthrie Creek trail where bluffs are actively slumping near the trail, the existing trails at Guthrie and Fleener creeks are generally located to follow the natural hillside contours and are not sited atop the bluff edge and are therefore away from and less vulnerable to erosive action. There is some room to relocate the Guthrie Creek trail segment near the bluff, should it fail, either on site, or through acquisition by BLM of adjacent property to develop a less vulnerable trail to the beach.

Additional Criteria

8. **Resolution of more than one issue:** ADA-compliant access on coastal bluffs is generally very limited and does not exist in this area of the coast. The proposed ADA trail and overlook would provide the only opportunity for ADA compatible access in the Lost Coast Headlands. Adding steps to the lower extent of Guthrie Creek Trail will provide uninterrupted seasonal coastal access.
9. **Leverage:** See the “Project Financing” section above.
10. **Readiness:** BLM has completed the comprehensive planning effort for the management area, has obtained a federal consistency determination from the California Coastal Commission, and is ready and able to begin the project immediately.
11. **Realization of prior Conservancy goals:** See “Project History” above.

CONSISTENCY WITH CONSERVANCY STANDARDS AND RECOMMENDATIONS FOR ACCESSWAY LOCATION AND DEVELOPMENT

The proposed project is consistent with several of the applicable standards of the Conservancy-adopted "Standards and Recommendations for Accessway Location and Development," including Standards 1 – 4, and 8.

Consistent with Standard No. 1, the trail will be located to safely accommodate public use and protect against misuse of coastal resources. Trail layout and design will follow the natural and gentle slopes of the terrain leading to Fleener Creek Trailhead from Centerville Bluffs picnic area. The trail will be positioned to avoid direct contact with adjacent private lands, thereby ensuring the privacy of nearby residences.

Consistent with Standard No. 2, the trail will follow the natural and gentle slopes of the hillside, thereby reducing fall hazards.

Consistent with Standard No. 3, the trail will be constructed no wider than necessary to accommodate public access.

Consistent with Standard No. 4, the design and location of the trail considers the privacy of nearby residences by being routed away from direct contact with private property.

Consistent with Standard No. 8, the trail will connect the shore with the road with a scenic overlook. The trail route avoids, to the extent practicable, geologically unstable and erosive soils.

CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:

The certified Humboldt County Local Coastal Program provides that, consistent with the requirements of the California Constitution and the Coastal Act of 1976, “maximum access and recreational opportunities shall be provided for all the people.” The proposed project will provide additional public access, including new ADA compliant access, and multiple recreational opportunities such as hiking, picnicking, and wildlife viewing.

COMPLIANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (“CEQA”)

BLM, a federal agency, completed an Environmental Assessment in the form of its Lost Coast Headlands Management Area Activity Plan, and adopted a Finding of No Significant Impact (“FONSI,” Exhibit 2) for the Lost Coast Headland Management Area public access and recreation project pursuant to the National Environmental Policy Act (“NEPA”).

CEQA Guidelines § 15221(a) directs that when a project requires compliance with both CEQA and NEPA, state and local agencies should use a federal FONSI rather than preparing a CEQA Negative Declaration where, as here, the FONSI is prepared before the Negative Declaration would be completed, and the FONSI complies with the CEQA Guidelines. Under CEQA Guidelines § 15225, the FONSI need not be recirculated by the state agency if the federal agency’s circulation meets the requirements of § 15072. That section, in turn, invokes § 15105, which requires a public review period of not less than 30 days.

Staff has reviewed the FONSI prepared and adopted by BLM, and has concluded that these conditions have been met with regard to the project. BLM’s NEPA review includes a description of the property and proposed project activities (as are described above, in the preceding sections of this staff recommendation). BLM circulated the FONSI for public review from October 10 through December 31, 2012, and received 27 public comments.

Unlike NEPA, CEQA requires consideration of mitigation measures, and adoption of a mitigation-monitoring or –reporting program (“MMRP”) for those measures. The federal Environmental Assessment indicates that the proposed project would have no “significant” impacts, though some of the environmental effects and countermeasures discussed in the FONSI might be considered potentially significant under CEQA and thus require mitigation and an MMRP. These are discussed below and in the recommended MMRP (Exhibit 3) prepared by Conservancy staff in compliance with CEQA. On October 30, 2013, BLM signed a Finding of No Significant Impact (“FONSI”) for the project, and on November 14, 2013, BLM filed a Decision Record.

Consistent with NEPA, BLM conducted surveys of the project area to determine the presence or absence of species listed as threatened or endangered under the federal Endangered Species Act in the project area. One threatened species, the Northern California steelhead Distinct Population Unit, was found to occur within the area, but BLM staff determined, having completed required consultation with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service, that the proposed project would not adversely affect any species. Western snowy plovers nest and winter on beaches adjacent to BLM lands, though oceanfront areas do not contain beach habitat suitable for nesting. BLM did not find any special status plants within the management area.

BLM found potential impacts from hazardous materials, erosion and soil disturbance, greenhouse gases, and fire, as well as potential impacts to cultural resources, wildlife, vegetation and livestock grazing.

Hazardous Materials

As part of its routine operations, the former Centerville Beach Naval Facility used hazardous materials and had maintained a hazardous materials storage area on the property east of Centerville Road. Moderate amounts of chemicals were spilled as a result of the operations. Prior to transfer of the property to BLM the U.S. Navy thoroughly investigated the site and remediated all identified chemical spills. Although it is believed that there is no remaining residual pollution on site, there remains a slight possibility that chemicals could be present in deeper soils. To determine the potential for residual pollutants to be present where excavations deeper than two feet would be scheduled, BLM will review the administrative record for Centerville Beach Naval Facility to determine proximity to sites where spills are known or suspected to have occurred. If sites are identified in the record, BLM will consult with a hazardous materials specialist to determine if soil sampling is necessary. If warranted, BLM will develop a 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 are possible from a variety of activities including ongoing routine use of Fleener and Guthrie Creek trails and parking areas, 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. Expanding grazing onto the Centerville Bluffs site could result in soil disturbance, erosion and compaction especially during wet periods, where animals gather near natural water sources, and in and around gates or other features that constrict cattle movement.

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. Installation of new split rail fencing at the Guthrie Creek trail parking area will further reduce surface erosion by preventing unauthorized driving outside of the parking area. The new parking area at Centerville Bluffs East will be sited on existing asphalt pavement and would not result in erosion.

While widening Centerville Road would result in minor soil displacement and additional surface prone to runoff and erosion near the road edge, the effects are expected to be minimized through increased onsite maintenance with gully rocking.

Though grazing could impact soils, the soil types present in the area are shown to withstand grazing. While comparison of adjacent areas suggests that the proposed grazing would result in minor erosion, widespread impacts are not anticipated. The proposed grazing would occur in the relatively flat uplands, reducing the risk of increased erosion. Further, 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.

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

Greenhouse Gases

It is possible that construction, site maintenance or operations could contribute small amounts of greenhouse gas emissions. Actions that could contribute to greenhouse gas emissions include 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. Short-term carbon release and emissions from combustion of fuel wood resulting from potential public fuel wood burn permits would occur. Additionally, cessation of carbon sequestration by removed non-native conifers would occur.

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.

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. 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. 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 only allowing fires in cooking grills 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.

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, 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.

To minimize potential disturbance to wildlife from direct interaction with humans, BLM has incorporated split rail fencing into its existing sites upgrades at Guthrie Creek, and low profile wire fences into Fleener parking area and new construction plans to prevent off-road vehicle access. Maintenance and construction activities will be conducted in concentrated periods to minimize the duration of wildlife disturbances. 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 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.

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 plant species of concern 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. 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 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 the 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.

If damage to grazing improvements occurs and cattle trespass onto the trail, BLM may reduce the cattle grazing area to allow for safe trail access. In the event that cattle are harassed or injured from unleashed dogs, BLM may either temporarily close the ADA 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.

The Environmental Assessment also considered cumulative impacts of the project (a requirement of CEQA but not of NEPA), and determined that these impacts would be either insignificant or beneficial. Finally, based on the FONSI, staff do not believe that the project will have any growth-inducing effects.

Under CEQA Guidelines § 15225, the Conservancy, as lead agency under CEQA, may use the FONSI for CEQA purposes after providing notice, consistent with § 15087, of its intent to use the NEPA document in place of a CEQA Negative Declaration, and of its determination that the federal document complies with CEQA. In accordance with § 15087(a), on August 29, 2014, staff filed with the State Clearinghouse a “Notice of Intent to Use Finding of No Significant Impact in Lieu of Negative Declaration” (Exhibit 6), and published the notice in the Eureka Times Standard daily newspaper. The California Department of Fish and Wildlife requested further clarity on the treatment of special status plants, and in response the Conservancy added additional language to the Vegetation mitigation measure in the MMRP. Staff recommends that the Conservancy adopt the Mitigation Monitoring and Reporting Program attached as Exhibit 3, to ensure that measures noted in the FONSI as potentially needed for mitigation are implemented if needed. The mitigation and monitoring will be implemented by BLM. If any mitigation measures are implemented during the construction, BLM will submit a report to the Conservancy.

Conservancy staff will file a CEQA Notice of Determination following project authorization.