

COASTAL CONSERVANCY

Staff Recommendation
June 25, 2015

ORICK MILL SITE RESTORATION

Project No. 14-055-01
Project Manager: Su Corbaley

RECOMMENDED ACTION: Authorization to disburse up to \$300,000 to the Save-the-Redwoods League to prepare habitat enhancement and public access conceptual designs for the Orick Mill Site Restoration Project.

LOCATION: 1.5 miles north of Orick, Humboldt County

PROGRAM CATEGORY: Resource Enhancement and Public Access

EXHIBITS

Exhibit 1: [Project Location](#)

Exhibit 2: [Project Photos](#)

Exhibit 3: [Project Letters](#)

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31251 - 31270 and 31400 - 31410 of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes the disbursement of up to three hundred thousand dollars (\$300,000) to the Save-the-Redwoods League to prepare habitat enhancement and public access conceptual designs for the Orick Mill Site Restoration Project at the former Orick Mill Site in Humboldt County, subject to the following conditions:

Prior to the disbursement of funds, the Save-the-Redwoods League shall submit for review and approval by the Executive Officer of the Conservancy a work program including a schedule and budget, and the names and qualifications of all contractors to be retained for the project.”

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 Chapters 6 and 9 of Division 21 of the Public Resources Code, regarding resource enhancement and public coastal access, respectively.

2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The Save-the-Redwoods League is a nonprofit organization existing under section 501(c)(3) of the U.S. Internal Revenue Code, and whose purposes are consistent with Division 21 of the Public Resources Code.”

PROJECT SUMMARY:

Staff is recommending that the Conservancy authorize disbursement of up to \$300,000 to the Save-the-Redwoods League (“SRL”) to develop conceptual designs for restoration and enhancement of Prairie Creek and develop conceptual designs for a trail network on the 125-acre former Orick Mill Site A (the “property” or the “mill site”), 1.5 miles north of Orick (Exhibit 1). The mill site is located at the confluence of Redwood Creek and Prairie Creek and is nearly surrounded by Redwood National and State Parks (“RNSP”) which encompasses Redwood National Park (“RNP”) and Prairie Creek State Park (“PCSP”). SRL purchased the property in 2013 to protect its resources, provide the public with trails, and establish a visitor center that would serve as a ‘gateway to the redwoods’.

The property includes the lowest one-mile of Prairie Creek, which has been altered by logging and the former mill operation, agricultural uses, and construction of Highway 101. It is incised and disconnected from its floodplain and off-channel habitat. This has resulted in a reduced flow capacity, an increased risk of flooding, and limited habitat for coho, Chinook salmon and steelhead trout. According to a California Department of Fish and Wildlife assessment of the Redwood Creek watershed, including the Prairie Creek sub-watershed (CDFW 2006), the coho population found in Prairie Creek constitutes the majority of the coho found in the entire Redwood Creek system. This indicates that Prairie Creek, even with the lower reach in a degraded state, provides critical rearing habitat for coho. The survey also found that Prairie Creek provides forage and habitat for Chinook salmon and steelhead trout life stages.

Based on the recently released National Marine Fisheries Service *SONCC Salmon Recovery Plan* (NMFS 2014) the Redwood Creek population of coho salmon has a high risk of extinction due to restricted spatial structure, reduced expression of diversity, and low abundance and population productivity, which result in low population viability. In addition, preliminary information from NMFS about the draft recovery plan for NC steelhead and CC Chinook salmon indicates that the Redwood Creek population of steelhead is also at a high risk of extinction and that the Redwood Creek population of CC Chinook salmon is at a moderate risk. The Redwood Creek population of all three species includes Prairie Creek populations. For these reasons, restoration of Prairie Creek is a priority for the protection the coho in the Redwood Creek system, and will provide additional needed habitat for Chinook and steelhead trout. Furthermore, the project site nearest Prairie Creek lies within the Federal Emergency Management Agency 100-year Flood Zone. Preparing restoration designs to expand the floodplain capacity of Prairie Creek will lead to improved resiliency to flooding events.

Highway 101 is the only north-south public right-of-way between the town of Orick and the PCSP through this area and serves as a segment of the Caltrans’ designated Pacific Coast Bike Route (“PCBR”) and the California Coastal Trail (“CCT”). However, because this section of the highway is narrow and winding with inadequate safety margins, it is not ideal for either the

PCBR or the CCT, and is therefore designated a 'gap' in the CCT. Prairie Camp Road, a former haul road, traverses the property north to south, connecting to the north and south of this narrow and winding section of the highway. Converting the haul road into the Prairie Creek Trail Corridor, would bypass this highway hazard for bicyclists and pedestrians.

The proposed Prairie Creek Trail Corridor concept has been identified as a future preferred route and a priority project for the CCT in the *Humboldt County Coastal Trail Implementation Strategy* (2011). Trails through the mill site would provide a link for the CCT and the PCBR, and would also connect existing RNSP trails in the Prairie Creek watershed with those in the Redwood Creek watershed.

As a separate effort, SRL is conducting a feasibility assessment for the design and development of a day-use visitor center on the property that would be the cornerstone for recreational activities like trail hiking and nature viewing, and serve as the gateway to RNSP. SRL is separately funding the design for the day-use visitor center.

The proposed Conservancy project would fund the development of the creek restoration and trails plans. The specific objectives and goals for each are listed below.

Prairie Creek Habitat Restoration and Enhancement

Objectives

- Improve the amount and quality of rearing habitat for juvenile salmonids.
- Restore geomorphic function and connectivity of the Prairie Creek channel and floodplain.
- Improve geomorphic function to restore fish passage in tributaries.
- Provide salmon migration viewing opportunities for the public.
- Maintain and provide habitat for marbled Murrelet and elk.

Goals

- Collect baseline data (topography, bathymetry, flow, temperature, turbidity, geomorphic conditions, groundwater, and salmonid habitat).
- Develop restoration conceptual design alternatives for analysis.
- Analyze and compare conceptual designs via modeling.
- Select a preferred conceptual design alternative.
- Develop plans of the preferred concept design, develop appropriate level cost estimates, and prepare a conceptual design report

Prairie Creek Trail Corridor

The objectives and goals of the Prairie Creek Trail Corridor planning are several-fold, including:

Objectives

- Complete a section of the California Coastal Trail and close a gap in the CCT.
- Potentially provide an alternative to Highway 101 for touring cyclists, local residents and RNSP visitors.
- Connect to trails leading to old-growth redwood groves and key destinations within RNSP.
- Highlight cultural and natural history of the site.
- Explore opportunities for interpretive trail loops for the visitor-serving facilities.
- Engage the Orick community and north coast region in planning for trail improvements.

- Provide improved mobility and access between public lands and the community of Orick.

Goals

- Provide plans, alternative conceptual designs and management considerations for a key section of the CCT and its integration with existing trails in RNSP system.
- Develop cost estimates for final trail design and construction.
- Develop interpretive signage concepts and designs.

The Conservancy has worked with SRL on a number of north coast projects over the last 15 years including acquisition of the 25,000 acre Mill Creek in Del Norte County, and acquisitions at Humboldt Lagoons State Park and Montgomery Woods State Park in the upper Big River watershed. SRL stepped in to provide interim funding for the Jenner Headlands acquisition in Sonoma County when the State funding was frozen. Recently, SRL and the Conservancy are working together to develop public access on its Shady Dell property in Mendocino County. SRL has proven its capabilities as a strong participant in conserving the coast and making it available for public enjoyment. SRL is a 501(c)(3) organization established to preserve and save portions of the redwood forests for scenic, recreational and wildlife preservation purposes.

Site Description: The 125-acre mill site is situated on the east side of Highway 101 between Bald Hills Road and Berry Glen at the confluence of Redwood Creek and Prairie Creek. Prairie Creek flows through the property, and the property is nearly entirely bounded by RNP (Exhibit 1). The property has remnant logging roads and approximately 20 acres of an asphalt building pad leftover from the mill operations as well as old-growth redwood and Douglas fir forest, and mature wetland habitat. The mill area has been investigated for toxics and certified as clean by the North Coast Regional Quality Control Board.

Located at the southern entrance into RNSP, this property is the gateway to the world's tallest trees and a national treasure that draws visitors from around the world. RNSP is designated a world heritage site and part of the California Coast Range Biosphere Reserve, designations that reflect worldwide recognition of the park's natural resources as irreplaceable. The flyway for the largest intact population of the federally threatened marbled murrelet occurs over the property and Roosevelt Elk forage on site. Otters, beaver, black bears, great blue herons, deer, and coyotes are known to frequent the site, and coho, Chinook salmon, steelhead trout and cutthroat utilize Prairie Creek.

As mentioned earlier, Prairie Creek has been altered by human activities. Its channel is incised and disconnected from its floodplain and off-channel features. Furthermore, tributaries on the property have barriers to upstream fish passage. The currently deep and confined channel, with steep streambanks, limits the ability of fish to access the highly productive feeding grounds and refugia of the floodplain and existing wetland habitat, and cold water tributaries.

See Exhibit 2 for photos of the site conditions and potential trail corridor.

Project History: Timber harvest operations in the Prairie Creek watershed began in the 1850s and much of the large scale stands of redwoods were gone by 1900. In the 1920s, SRL purchased 14,000 acres in the upper Prairie Creek watershed. However, logging accelerated between World War II and the economic boom of the 1950s. It continued until 1978 when the then-nascent RNP, which was formed in 1968, expanded and ceased all timber activities. During that time, more than 55 percent of the Prairie Creek redwoods were harvested.

The Prairie Creek corridor has been a priority for protection since 1968, and SRL has been working with willing sellers and the NPS to acquire properties in this area that become available. Since then, SRL has added over 1,400 acres to RNP's current ownership.

In late 2013, SRL purchased the mill site and immediately began moving toward its vision of site restoration, enhancement and public use. SRL and NPS signed a memorandum of agreement in 2014 to work together in pursuit of this vision. SRL has engaged consultants to begin preliminary evaluations for the creek restoration and the trail opportunities. In November 2014, SRL contacted the Conservancy to seek funding to further develop these opportunities into conceptual designs sufficient to select design alternatives.

PROJECT FINANCING

Coastal Conservancy	\$300,000
Save-the-Redwoods League	\$100,000
Project Total	\$400,000

Funding for the habitat design portion of the proposed project is expected to come from the Conservancy's FY 2013 appropriation from the Habitat Conservation Fund ("HCF") (under the "California Wildlife Protection Act of 1990" – Proposition 117). The Conservancy may use HCF funds for the acquisition, restoration, or enhancement of riparian habitat. (Fish & Game Code 2786(f)). As required by the HCF, it is contemplated that access will be provided to the extent that it does not interfere with habitat protections developed on the properties.

The expected source for the Conservancy funds for the public access component of the proposed project is the fiscal year 2009-2010 appropriation from Proposition 84, the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Proposition 84) for Coastal Conservancy state-wide resource protection projects, which can be used for the development of public access consistent with Division 21 of the Public Resources Code, the Conservancy's enabling legislation.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The proposed project would be undertaken in part pursuant to Chapter 6 of the Conservancy's enabling legislation, Public Resource Code Sections 31251-31270, as follows:

Pursuant to § 31251, the Conservancy may award grants to nonprofit organizations for the purpose of enhancement of coastal resources which, because of human-induced events, or incompatible land uses, have suffered loss of natural and scenic values. This project will produce designs to restore the function of the Prairie Creek floodplain which has been altered by past timber activities and operations at the mill site.

As provided in § 31252, the proposed project is consistent with the County of Humboldt's Local Coastal Program, as described in the "Consistency with Local Coastal Program Policies" section below.

Pursuant to § 31253, the Conservancy may provide up to the total of the cost of any coastal resource enhancement project taking into consideration the total cost of the project, the fiscal

resources of the grantee, the urgency of the project and other factors as determined by the Conservancy. Consistent with this section, the proposed contribution, intended for the conceptual design of a significant coastal habitat enhancement project, represents a small component of the overall project cost to date and contributions by SRL, which has invested not only in the project acquisition, but has initiated – at its expense – critical surveying data collection to expand upon existing Lidar data.

The proposed project also would be undertaken in part 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 develop plans for a new segment of coastal trail that would provide the public with access to and along coast. The proposed funding authorization is thus consistent with § 31400.

Section 31400.2 allows the Conservancy to fund up to the total cost of the initial development of public accessways by nonprofit organizations. The anticipated cost for the access planning component is small at approximately \$23,000 which is a fraction of the overall project budget. As there are no available matching funds for access planning, the Conservancy is being asked to provide the total cost of this planning phase.

Section 31400.3 allows the Conservancy to aid nonprofit organizations in establishing a system of public coastal accessways. SRL is a 501(c)(3) organization established to preserve and save portions of the redwood forests for scenic, recreational and wildlife preservation purposes. 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 proposed trails will fill a gap identified in the Humboldt County Coastal Trail Implementation Strategy (2011), and will connect with trails to the RNPS Lady Bird Johnson Grove, located inland of the mill site.

Additionally, as provided in § 31111, the Conservancy may award grants to nonprofit organization to undertake plans and feasibility studies for purposes consistent with Division 21. SRL is a nonprofit organization undertaking planning for habitat restoration and public access, both of which are consistent with the purposes of Division 21.

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

Consistent with Goal 1 Objective C of the Conservancy’s 2013-2018 Strategic Plan, the proposed project will result in the design of a new segment of the California Coastal Trail.

Consistent with **Goal 2, Objective C** of the Conservancy’s 2013-2018 Strategic Plan, the proposed project will result in the design of facilities to increase and enhance coastal recreational opportunities.

Consistent with **Goal 2, Objective E** of the Conservancy’s 2013-2018 Strategic Plan, the proposed project will design a new regional trail that will fill a gap in the coastal trail north of

Orick, and connect with existing inland trail system at RNPS Lady Bird Johnson Grove and the PCSP Tall Trees Grove.

Consistent with **Goal 5, Objective B** of the Conservancy's 2013-2018 Strategic Plan, the proposed project will result in design plans for the restoration and enhancement of coastal habitats including stream corridors.

Consistent with **Goal 5, Objective C** of the Conservancy's 2013-2018 Strategic Plan, the proposed project will develop plans to preserve and enhance coastal watersheds and floodplains.

Consistent with **Goal 9, Objective B** of the Conservancy's 2013-2018 Strategic Plan, the proposed project will support the design of interpretive displays and exhibits related to coastal and watershed resource education.

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 October 2, 2014, 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. **Promotion and implementation of state plans and policies:** The proposed project is consistent with several state plans and policies, as follows.
 - By developing plans to restore stream function and habitat quality of Prairie Creek, this project is consistent with the federal National Marine Fisheries Service 2014, *Final Recovery Plan for the Southern Oregon/Northern California Coast Evolutionarily Significant Unit of Coho Salmon (*Oncorhynchus kisutch*)* which describes that the juvenile life stage, and lack of winter rearing habitat as well as a degraded estuary, high instream water temperatures and simplified habitat in general are likely limiting productivity of the Redwood Creek coho salmon population, including the Prairie Creek population. The plan lists access to floodplain habitat, improved riparian habitat, and increased channel complexity as recovery priorities for Redwood Creek population.
 - The proposed project is consistent with the themes for habitat restoration identified in the *Steelhead Restoration and Management Plan for California*. Specifically, that plan advises that "(h)abitat improvement projects should be focused on the many areas throughout the State where steelhead habitat is severely degraded and restoration work is sorely needed" (p. 74). Floodplain habitat is one of the most degraded, rare and yet necessary areas to support the growth and survival of juvenile salmonids.
4. **Support of the public:** The proposed project is supported by U.S. Congressman Jared Huffman, State Senator Mike McGuire, Assemblyman Jim Wood, the County of Humboldt, the Humboldt Trails Council, Caltrans District 1, California Department of Fish and Wildlife, and Redwood Parks Association. (Exhibit 3).

5. **Location:** The project is located at the confluence of Redwood Creek and Prairie Creek approximately 3.5 stream miles from the mouth of Redwood Creek at the Pacific Ocean and outside of the coastal zone. Undertaking this project will benefit coastal resources by providing coastal salmon populations with sufficient floodplain habitat to fulfill their life history patterns. Additionally, developing a network of trails that connect with trails of the PCSP will provide a link for pedestrians from this inland resource to the coast.
6. **Need:** This funding will further data collection efforts and initiate planning that is critical to setting the stage for future funding opportunities that leverage Conservancy funds. If Conservancy funding is not authorized, this planning project would likely not happen in the near-term, resulting in a significant delay in the project.
7. **Greater-than-local interest:** Located in the heart of the redwoods and the north coast of California, a new gateway facility has the potential to become the regional hub of coastal and redwood ecosystem nature study. The proposed project would enable NPS to plan for increased service capacity for visitors from around the world that are attracted to the state and national parks. The eventual restoration and expansion of critical salmon habitat will benefit the northern California populations of coho, Chinook salmon and steelhead trout. The redwood coast is popular with both hikers and bicyclers from near and far. The proposed project would further the statewide goal of completing the CCT, and would benefit cyclists traveling along the PCBR.
8. **Sea level rise vulnerability:** Vulnerability to sea level rise is minimal on the Orick Mill Site property as it is outside the coastal zone and above the current 100-year sea level rise projections.

Additional Criteria

9. **Urgency:** Unless the project can begin in early summer 2015, SRL will miss several opportunities to apply for significant sources of future funding to complete 100 percent designs, obtain permits, and implement the restoration project. Due to the funding cycles of those grant rounds, the entire project could be delayed as much as two years.
10. **Resolution of more than one issue:** The proposed project would allow SRL and RNP to plan for a visitor center to replace the to-be-demolished Kuchel Visitor Center, develop a safe segment of the CCT and the PCBR, and restore lower Prairie Creek to provide critical salmonid habitat.
11. **Leverage:** See the “Project Financing” section above.
12. **Conflict resolution:** The proposed project would plan for a segment of the CCT and PCBR that, when constructed, will eliminate the safety issues faced by pedestrians and bicyclists on the parallel stretch of Highway 101.
13. **Innovation:** SRL could simply plan to develop the site into a day use visitor center to serve the local community and tourists travelling through the area. However, having broader vision and recognizing a unique opportunity to undertake a holistic approach to heal the site, SRL will prepare a plan for complete site restoration. This will not only provide the needed stopover visitor center, but will enhance the visitor experience by engaging them in the history of the site and its resources.

14. **Readiness:** SRL has already completed a feasibility assessment for site development, has begun collecting critical spring season biologic and hydrologic data, and is poised to expand the planning effort with Conservancy funds by July 2016. Additionally, SRL has engaged a separate team to design the visitor center to ensure all project aspects are implemented simultaneously.
15. **Realization of prior Conservancy goals:** The Conservancy shares the goal of restoring Redwood Creek habitat to support and increase its salmonid populations. To that end, the Conservancy has previously supported habitat enhancement planning efforts in Redwood Creek estuary, and granted funds to the Northcoast Regional Land Trust to identify acquisition opportunities to restore the Redwood Creek estuary for fish habitat and acquire the McNamara Ranch, located in the estuary. While additional acquisitions in the Redwood Creek estuary are not expected to occur in the near future, restoring habitat in Prairie Creek will go far to improving the viability of the local salmonid populations. The proposed project will further these goals.
17. **Cooperation:** Restoring the mill site for both visitor and habitat resources is a vision shared by, and in cooperation with, several local, state and federal agencies, and regional organizations. These include the town of Orick, Humboldt County, Caltrans District 1, California Department of Fish and Wildlife, United State Fish and Wildlife Service, the National Oceanic and Atmospheric Association – National Marine Fisheries Service, the National Parks Service, Humboldt Trails Council, Redwood Coast Mountain Bike Association, and the National Parks Association.
18. **Vulnerability from climate change impacts other than sea level rise:** On the North Coast, climate change impacts are predicted to include reduced rain precipitation and more frequent storms – both of which could increase fire frequency and/or severity. However, the project site is coastal in nature and includes a significant riparian area so the project would likely not be impacted by more frequent fire. Climate change may also impact fog precipitation and therefore affect species habitat and abundance, but these changes would not be predicted to affect the trail portion of the project. Restoration planning will consider these potential climate change impacts in all conceptual designs especially when recommending plant species planting palettes.
19. **Minimization of greenhouse gas emissions:** The proposed project involves feasibility and conceptual planning and design work that will not, in and of itself, result in any significant greenhouse gas emissions. The designs completed through this grant will include measures to avoid or minimize greenhouse gas emissions to the extent feasible and consistent with the project objectives. Vehicle miles travelled for project meetings and site visits to carry out this planning project will be minimized through coordination of activities and carpooling. A goal of the public access component of this project is to provide a safe, non-motorized travel option between RSNP properties for local residents and tourists, which may reduce greenhouse gas emissions for recreational and nature study trips. In addition, restoration of the site will enhance the habitat and the potential for carbon sequestration.

CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:

The property is located outside the coastal zone, and therefore the Humboldt County General Plan guides land use in this area. Though the property is located outside the coastal zone, the

Humboldt County Local Coastal Plan (“LCP”) (1982) is relevant to the proposed project in that it supports restoration of sensitive habitats and completion of the CCT within Humboldt County.

Chapter 3.41, Sections A.1.d. and A.1.g. of the LCP defines environmentally sensitive habitats as “[R]ivers, creeks, and associated riparian habitats including Redwood Creek,...” and “[O]ther critical habitats for rare and endangered species listed on State or Federal lists”, respectively. Further, Chapter 3.41, Section G states “the biological productivity and quality of coastal streams...appropriate to maintain optimum populations of marine organisms shall be maintained and restored” and further lists Redwood Creek among these streams. Prairie Creek, a critical tributary to Redwood Creek supports state and federally listed endangered coho, Chinook and steelhead trout. Thus, planning for the restoration of Prairie Creek is consistent with the LCP.

Chapter 4.71, Section 15(5) recommends that “Humboldt County, in cooperation with Redwood National Park, State Department of Parks and Recreation, the Coastal Conservancy, and private property owners, should explore the possibility of a trail from Dry Lagoon State Park to the Tall Trees Grove.” All of the aforementioned entities are a party to the effort to complete the CCT in this area, and the Tall Trees Grove is located on Prairie Creek State Park, adjacent to the mill site property, through which the proposed CCT would pass. Thus the proposed project is consistent with this section of the Humboldt County LCP.

Additional evidence for support of the project is found in county plans drafted but not yet approved, and is as follows. There are four parcels that constitute the site. While the General Plan land use designation is Agricultural, there are also Industrial Resources and Suburban overlays due to the prior use as a mill and the residential nature of the parcels on the west side of Hwy 101. The zoning is a mix of Forest Recreation, Agricultural General, and Heavy Industrial that all reflect the past land uses. The main area of interest, the Prairie Creek corridor, is zoned Forest Recreation. The paved area is zoned Heavy Industrial. The Humboldt County General Plan is in the process of being updated, and the zoning designation as currently proposed in the update is expected to change the zoning designation to Commercial Recreation for the entire site. This designation would be consistent with the future intended use of the site as a gateway facility with a visitor center that includes a restoration overlay.

The current draft of the Humboldt County General Plan update in progress also supports the development of trails and specifically the CCT through several policies: C-GX Access to Active Transportation - Improved access to non-motorized modes of transportation; including walking, bicycling, horseback riding, and hiking; and C-P36 Develop a Regional Trails System - Support efforts to establish and connect regional trails, particularly in the greater Humboldt Bay and lower Mad River area, Eel River Valley, along the Avenue of the Giants and in the Klamath-Trinity area. The System should include the California Coastal Trail system and consist of multi-use trails where feasible.

COMPLIANCE WITH CEQA:

Staff has reviewed the proposed project and determined that the project is exempt from the California Environmental Quality Act (CEQA) pursuant to the CEQA Guidelines, Title 14 of the California Code of Regulations.

The proposed project is statutorily exempt pursuant to § 15262 in that it involves only the preparation of plans for habitat restoration and public access for possible future actions which the

Conservancy has not approved, adopted, or funded and which will not have a negative effect on the environment.

The proposed project is categorically exempt pursuant to § 15306 in that it will include basic data collection and research (neither of which will have a negative impact on any environmental resources), undertaken as part of a study leading to an action which the Conservancy has not yet approved, adopted, or funded.

The planning and design effort does not have a legally binding effect on future activities or authorizations, which would be subject to further CEQA review. Staff will file a Notice of Exemption upon approval.