

Appendix B – Resource Sections Dismissed

1. Introduction

This appendix documents the reasoning for dismissing or eliminating several California Environmental Quality Act (CEQA) resource topics and significance criteria from detailed analysis in the environmental impact report (EIR) for the General Waste Discharge Requirements for Nonpoint Source Discharges Related to Certain Land Management Activities Conducted on Federal Lands in the North Coast Region, being proposed by the North Coast Regional Water Quality Control Board (North Coast Water Board). The Proposed Project would involve implementation of sediment source treatments by the United States Forest Service (USFS), Bureau of Land Management (BLM), and National Park Service (NPS), as well as monitoring activities, as a requirement of the proposed Federal Lands Permit. The proposed Federal Lands Permit would apply to the following on-going activities conducted by the federal agencies: timber harvest, vegetation and fuels management, transportation management, recreation facilities management, livestock grazing, post-wildfire management and recovery, and aquatic habitat restoration activities.

A brief summary and description of each of the resource topics and significance criteria that are eliminated from detailed analysis in the EIR is provided below. The resource topics and significance criteria are discussed with respect to the guidance in the CEQA Guidelines, Appendix G.

2. Resource Topics and Significance Criteria Eliminated From Detailed Analysis

2.1. Land Use and Planning

Setting

The Proposed Project would occur entirely on lands managed by the USFS, BLM, and NPS. As such, these federal lands are not subject to local land use laws or plans, and there are no incorporated cities or towns within the Proposed Project area.. As described in Chapter 2, *Project Description*, of the EIR, the USFS, BLM, and NPS lands are managed in accordance with federal laws and guidance to serve multiple uses of the public lands. Specifically, USFS lands are managed in accordance with the Forest and Land Resource Management Plan (LRMP) developed for each National Forest, while BLM management actions are completed under the direction of an approved Resource Management Plan (RMP) and National Park management actions are guided by Management Plans (MPs).

Impacts

Although some of the reasonably foreseeable management measures and associated monitoring activities may take place near communities, towns, or cities, should they occur on or near the border of USFS, BLM, and NPS lands, they would not physically divide an established community. The reasonably foreseeable management measures would be limited to measures

and treatments to control erosion, sediment, and other nonpoint source pollutants and the Proposed Project would not result in the construction of any new buildings, offices, or substantial infrastructure to support new developments. Therefore, there would be no potential for impact with respect to the potential to physically divide an established community (significance criterion “a”).

The on-going activities (i.e., those proposed for coverage under the Proposed Project) being conducted by the USFS, BLM, and NPS are subject to already existing plans, regulations, and policies, including applicable LRMPs, RMPs, and MPs at the federal level. As noted above, the federal lands are not subject to local land use laws or plans. Generally, the management measures and associated monitoring activities would be implemented for the purpose of protecting water quality and would not substantially conflict with elements of the LRMPs, RMPs, MPs, or other federal guidance that has the purpose of avoiding or mitigating an environmental effect. Additionally, mitigation measures have been developed throughout this FEIR that would reduce and avoid potential impacts to environmental resources that could be affected by the Proposed Project. For these reasons, implementation of the Proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation. Therefore, there would be no potential for a significant impact with respect to significance criterion “b”.

2.2. Population and Housing

Setting

Population

The North Coast Water Board jurisdictional area covers approximately twelve million acres of land in California. The North Coast Water Board boundary also includes all or part of 8 of California’s 58 counties. **Table 1** shows the population growth for each county with at least a portion of its area within the boundaries of the North Coast Water Board. As shown in Table 1, between 2010 and 2023, the population of the counties with portions in the North Coast Water Board jurisdictional area grew by approximately 22 percent.

Table 1. Population in Counties with Land in the North Coast Water Board Boundary (2010 through 2023)

County (All or Portion in NCWB)	2023	Growth Since 2010
Del Norte	27,482	-3.94%
Glenn	29,157	3.68%
Humboldt	137,015	1.78%
Lake	69,213	7.03%
Mendocino	92,729	5.56%

County (All or Portion in NCWB)	2023	Growth Since 2010
Modoc	8,403	-13.25%
Sonoma	490,357	1.34%
Siskiyou	43,830	-2.38%
Trinity	16,811	21.94%

Source: California State Demographics

While Table 1 shows the population statistics for counties with land in the North Coast Water Board boundary, the Proposed Project would take place on the federal lands managed by the USFS, BLM, and NPS. By land area, 46 percent of the North Coast Region is federally managed by the USFS, BLM, and NPS.

Housing

It is not intended for the general public to permanently live on lands managed by the USFS, BLM, or NPS. Federal lands are undeveloped and typically the general public will only temporarily reside on these lands for recreational purposes (BLM 2021a). However, there is a permit process to allow minimal residential occupancy on BLM California land (BLM 2021b).

Workforce

USFS, BLM, and NPS lands are federally owned, maintained, and operated. The USFS as a whole has a workforce of 30,000 employees (USFS No Date). Generally, each ranger district (there are multiple ranger districts in each National Forest) has a staff of 10-100 people. Within the North Coast Water Board boundary, there are six National Forests with at least a portion of land within the boundary. Many on-the-ground activities occur on the ranger districts, including trail construction and maintenance, operation of campgrounds, and management of vegetation and wildlife habitat (USFS No Date). In the summer, the workforce of USFS increases due to the onboarding of seasonal staff to meet the additional need for services such as wildfire response, and recreation. The USFS Region 5 – Pacific Southwest Region office is in Vallejo, California. The Region 6 – Pacific Northwest Region office is in Portland, Oregon.

BLM has a workforce of over 10,000 employees nationwide (BLM 2021c). BLM California headquarters are located in Sacramento, while there are district offices in Palm Springs, Redding, and El Dorado Hills, each with multiple field offices, of which four are located in the North Coast Region.

The NPS workforce nationwide has approximately 27,000 employees. The NPS Pacific West Region covers National Parks in Washington, Oregon, California, Nevada, Idaho, and Hawaii.

2.3. Impacts

Implementation of the sediment source treatments and certain management measures, which may be required by the Proposed Project, would not induce substantial unplanned population growth, nor would it displace substantial numbers of existing people or housing. The Proposed Project would not require or result in the construction of any housing, office buildings, or related structures. Therefore, the Proposed Project would not directly or indirectly induce substantial unplanned population growth. Furthermore, implementation of the management measures would occur on USFS, BLM, and NPS managed lands, which are sparsely populated, and thus the Proposed Project would not displace any existing housing or people. Therefore, there would be no potential for significant impacts under significance criterion “a” or “b”. This resource topic is dismissed from detailed consideration in this final EIR (FEIR).

2.4. Public Services

Setting

Police Protection

Considering that the Proposed Project area is federally managed, the federal government has jurisdiction over law enforcement on these lands. Per the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM has been given resource protection and law enforcement responsibilities to ensure public safety and protection of various types of resources, such as timber, energy and minerals, recreational sites, archaeological/paleontological sites, wildlife habitat, and national monuments¹. The BLM has approximately 200 law enforcement rangers (uniformed officers) and approximately 70 special agents (criminal investigators) on staff who promote safety, security, and environmental protection of public lands, public land users, and employees. BLM law enforcement officers also work closely with State agencies and county law enforcement offices to protect public safety (BLM 2021d).

USFS also has their own law enforcement, currently employing approximately 650 law enforcement personnel nationwide (USFS 2021). This includes Law Enforcement Officers, who enforce Federal laws and regulations governing National Forest System lands and resources, and Criminal Investigators, who plan and conduct criminal and administrative investigations as they relate to laws governing the National Forest System (USFS 2021). Each USFS region (e.g., Region 5 – Pacific Southwest Region) has a Special Agent in Charge who oversees the law enforcement program.

National Park Service law enforcement rangers and the special agents are stationed around the country and work to fulfill the NPS mission by protecting the natural and cultural resources parks were established to preserve, and by keeping people safe when they visit. While these rangers and special agents fulfill their primary duty as law enforcement officers, many of them

¹ National monuments can be managed by a number of federal agencies such as the BLM, USFS, the United States Fish and Wildlife Service, National Park Service, etc.

are trained in other types of emergency response, including structural and wildland firefighting, emergency medical services, and search and rescue.

Schools

There are numerous schools throughout the North Coast Water Board's jurisdictional area; however, there are no schools on USFS, BLM, and NPS lands.

Parks

The federal lands managed by USFS, BLM, and NPS offer many recreational opportunities. These include hiking trails, as well as off-highway vehicle (OHV) and equestrian trails, and designated areas for target shooting, hunting, etc. The USFS, BLM, and NPS also maintain campgrounds, boat ramps, and other types of recreational facilities. However, none of these recreational features would be considered public parks and neither BLM, USFS, nor NPS manage any public parks.

Other Public Facilities

As discussed above, USFS, BLM, and NPS offer a variety of recreational opportunities and facilities, such as camp and picnic sites; public bathrooms; horse, bike, and hiking trails; electric hook ups, and much more.

Impacts

Implementation of the sediment source treatments and certain management measures would occur on federal lands, where public services are limited. Furthermore, as discussed above, the Proposed Project would not increase population. There are no schools on federal lands managed by the USFS, BLM, and NPS within the North Coast Water Board boundary and the reasonably foreseeable management measures and monitoring activities would not be expected to result in law enforcement calls for service. Although the USFS, BLM, and NPS offer many recreational opportunities, they do not manage any public parks and there are no public parks on the USFS, BLM, or NPS lands. Some USFS, BLM, and NPS facilities (e.g., camp and picnic sites, public bathrooms, trails, boat ramp parking lots, etc.) could be temporarily affected during implementation of some sediment source treatments or management measures, but this would not result in substantial impacts or the need for new or physically altered facilities.

Overall, the Proposed Project would not increase the demand for police protection, schools, parks, or other public facilities, and would not otherwise substantially affect service ratios, response times or other performance objectives for these public services. As such, there would be no need for new or physically altered governmental facilities related to police, schools, parks, or other public facilities, the construction of which could cause significant environmental impacts. Therefore, the significance criteria related to these public services ("a, ii"; "a, iii"; "a, iv"; and "a, v") are dismissed from detailed consideration in the FEIR.

Due to the nature of some sediment source treatments/certain management measures (i.e., involving ground-disturbance and use of mechanized/combustion-engine equipment) which could be implemented under the Proposed Project, there is some potential for Proposed Project

activities to increase fire risk. In particular, since many management activities would take place within forests and other highly-combustible landscapes, this would increase potential for igniting a large wildfire, which could draw limited federal and state resources, thereby impacting the ability of federal and state agencies to respond to wildfires elsewhere. Additionally, the Federal Lands Permit would require implementation of management measures and monitoring actions in conjunction with wildfire management activities on federal lands. As such, the significance criterion related to fire protection service (“a, i”) is carried forward for detailed analysis in the EIR.

2.5. Recreation

Setting

As discussed under Section 2.4, “Public Services,” the USFS, BLM, and NPS offer numerous recreation opportunities and facilities on their lands. On-going management activities by the USFS, BLM, and NPS related to recreation include the management of developed campgrounds, dispersed campsites, OHV use, and other recreation facilities such as trails, trail heads, boat ramps, docks, bathrooms, showers, potable water supplies and washing areas. Specific facilities within the North Coast Water Board boundary are too numerous to list but would include facilities within the 16 National Forests, 4 BLM Field Offices, and two National Park/Monuments with at least a portion of their area in the North Coast Water Board boundary.

Impacts

Implementation of sediment sources and certain management measures pursuant to the Proposed Project, such as developing campsites away from surface waters or riparian areas and having designated fueling locations for OHV use, would not substantially increase the use of existing recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. While implementation of specific management measures at a certain recreational facility/area could temporarily affect that facility or area (e.g., temporary closure of a trail or facility), this would not reasonably result in such a substantial increase in the use of a nearby area or facility to result in substantial physical effects. Implementation of management measures would benefit recreation facilities management activities and recreational facilities by providing benefits such as better access, sanitation, and erosion and sediment control.

As described above in Section 2.2, “Population and Housing,” the Proposed Project would not induce population growth; therefore, it would not result in a substantial increase in demand for, or use of, recreational facilities on federal lands in the North Coast Water Board boundary. Likewise, the Proposed Project would not require or result in the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. The Proposed Project would be limited to implementation of management measures for water quality protection, and associated monitoring and reporting. Therefore, there would be no potential for significant impacts under either significance criterion (“a” and “b”) related to recreation. Therefore, this resource topic is eliminated from detailed analysis in the EIR.

3. References

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