Initial Study / Mitigated Negative Declaration

Beachfront Park Improvements Project

March, 2025

Final Prepared by the City of Crescent City

Prepared with assistance from
Camas, LLC
680 G Suite C
Jacksonville, OR 97530

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City of Crescent City
NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION
Beachfront Park Improvements Project

NOTICE IS HEREBY GIVEN that the City of Crescent City intends to adopt a Mitigated Negative Declaration (MND) for improvements to Beachfront Park. The MND has been approved for public review by the Community Development Director. Copies are available for review and comment at City Hall 377 J Street, Crescent City, CA 95531. Comments and recommendations on the adequacy of the environmental document may be filed at the City of Crescent City during the public review period established for the project.

PROJECT: Beachfront Park Improvements Project

APPLICANT/AGENT: City of Crescent City, 317 J Street, Crescent City, CA 95531. (707) 464-7483 or bbrown@shn-engr.com.

LOCATION: The Project site is Beachfront Park, a 35-acre recreational and open space park in Crescent City, Del Norte County, California. The park is bounded by Front Street on the north, Elk Creek on the east, Crescent Harbor on the south, and B Street on the west. The project is located at 391 Front Street, Assessor Parcel Number (APN): 118-020-031-000

PROJECT DESCRIPTION: The City of Crescent City is proposing improvements to Beachfront Park, a waterfront community park and open space situated along Crescent City Harbor. New or replacement construction consists of:

- an amphitheater,
- waterfront plaza for farmers markets,
- interpretive trail (i.e., Tolowa Interpretive Trail), including structures for three interpretive nodes and three interpretive stations
- new entryway and signage, improvements to the entry to the Del Norte County Visitor/Cultural Center,
- plazas for the Tolowa Interpretive Trail
- waterfront overlook
- expansion of the children's play area with inclusive play features,
- 1-mile running/walking loop,
- new restrooms,
- development of new sports fields in the central portion of the park along with connecting paths (this document covers the physical placement/construction activities of improvements but does not include the operations, as those details are unknown at this time and funding is not secured))
- landscape and irrigation improvements,
- various site furnishings, including lighting, and
- various subsurface utilities.

ENVIRONMENTAL DOCUMENT: The MND can be viewed at the at City Hall 377 J Street, Crescent City, CA 95531 or on the City website at https://www.crescentcity.org/

REVIEW PERIOD: March 7, 2025 – April 9, 2025, at 5:00 p.m.

CONTACT FOR MORE INFORMATION: Bob Brown, Contract Community Development Director, at (559) 624-7199 or bbrown@shn-engr.com

The MND has a review period of **30 days**, starting on **Friday, March 7, 2025**, and ending on **Wednesday, April 9, 2025**, Any written comments on the MND should be sent to Bob Brown, Contract Community Development Director, City of Crescent City, 317 J Street, Crescent City, CA 95531 at (707) 464-7483 or bbrown@shn-engr.com.

After the close of the public comment review period on the MND established by this notice, the MND will be set for consideration for adoption before the City of Crescent City City Council. Notice of the date, time and place for such public hearing will be published and/or mailed as provided by law.

Please take notice that - pursuant to Public Resource Code Section 21177, Government Code Section 65009, and other applicable law - if you challenge the proposed action described above in court, then you may be limited to raising only those issues or objections you or someone else raised during the public comment period or the public hearing, or in written correspondence delivered to the City of Crescent City within the review period, or to the City Council during the adoption of the CEQA document.

Contents

1. Introduction

1.1. Purpose of the Study

The City of Crescent City will act as the Lead Agency for this project pursuant to the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

This Initial Study/ Mitigated Negative Declaration (IS/MND) has been prepared to evaluate potential environmental effects of the proposed Beachfront Park Improvements Project located in the City of Crescent City, California. This document has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.).

1.2. Evaluation Terminology

The environmental analysis is patterned after the Initial Study Checklist recommended in the State CEQA Guidelines. For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the proposed Project. Environmental impacts are separated into the following categories:

> *Potentially Significant Impact*. This category is applicable if there is substantial evidence that an effect may be significant, and no feasible mitigation measures can be identified to reduce impacts to a less than significant level. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
>
> *Less Than Significant After Mitigation Incorporated*. This category applies where the incorporation of mitigation measures would reduce an effect from a "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measure(s), and briefly explain how they would reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
>
> *Less Than Significant Impact*. This category is identified when the project would result in impacts below the threshold of significance, and no mitigation measures are required.
>
> *No Impact*. This category applies when a project would not create an impact in the specific environmental issue area. "No Impact" answers do not require a detailed explanation if they are adequately supported by the information sources cited by the lead agency, which show that the impact does not apply to the specific project (e.g., the project falls outside a fault rupture zone). Any "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)

Regardless of the type of CEQA document that must be prepared, the basic purpose of the CEQA process as set forth in the CEQA Guidelines Section 15002(a) is to:

> (1) Inform governmental decision makers and the public about the potential significant environmental effects of proposed activities.
>
> (2) Identify ways that environmental damage can be avoided or significantly reduced.

(3) Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.

(4) Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

1.3. Organization of this Initial Study

This document is organized into the following sections:

- **Section 1: Introduction**: Describes the purpose, contents, and organization of the document and provides a summary of the Project.
- **Section 2: CEQA Determination**: Identifies the determination of whether impacts associated with the development of the Project are significant, and what, if any, additional environmental documentation may be required.
- **Section 3 Project Description**: Includes a detailed description of the Project.
- **Section 4: Environmental Checklist**: Contains the environmental impacts analysis based on the CEQA Guidelines Appendix G. Each subsection includes a summary of the environmental and regulatory setting, followed by a discussion of potential environmental impacts and mitigation measures, if necessary.
- **Section 5: References:** Provides a bibliography of printed references and websites in preparing this IS/MND.
- **Section 6: Appendices**

1.4. Project Summary

Project Title:	Beachfront Park Improvements Project
Lead Agency Name and Address:	City of Crescent City, 377 J Street, Crescent City, CA, 95531
Contact Person and Phone Number:	Bob Brown (Community Development Director) – (707) 464-7483
Project Location and Assessor's Parcel Number (APN):	APN: 118-020-031-000
Project Sponsor's Name and Address:	City of Crescent City, 377 J Street, Crescent City, CA, 95531
Property Owner	City of Crescent City, CA
General Plan Designation:	Conservation and Open Space
Zoning:	Coastal Zone – Open Space District (CZO)
Description of Project	Refer to Project Description below.
Surrounding Land Uses and Settings	The Project site is located on the southern edge of Crescent City, along Crescent Harbor. Uses immediately surrounding the Project area include a fuel and home heating oil delivery

	company, bar/restaurant, residential apartments, and various commercial businesses to the north; the Lighthouse Cove Recreational Vehicle Park to the east; and the Crescent City Wastewater Treatment Plant to the west.
Other Public Agencies Whose Approval or Input is Required	California Coastal Commission California Department of Fish and Wildlife California Department of Transportation California State Historic Preservation Office North Coast Regional Water Quality Control Board
Native American Consultation	Cher-Ae Heights Indian Community of the Trinidad Rancheria; Elk Valley Rancheria; Karuk Tribe; Pulikla Tribe of Yurok People; Tolowa Dee-ni' Nation; Melochundum Band of Tolowa Indians; Tolowa Nation; and Yurok Tribe.

Project Description Summary

The City of Crescent City is proposing improvements to Beachfront Park, a waterfront community park and open space situated along Crescent City Harbor. In 2021, Crescent City approved the Beachfront Park Master Plan improvements (Resolution 2021-07). A CEQA Notice of Exemption for construction of the improvements in the Master Plan was posted at that time at the Del Norte County Clerk's office. In 2023, the City approved the updated Beachfront Park General Development Plan *in order to activate underutilized portions of the park to better serve local residents and establish the park as a destination for the region, while conserving the park's natural setting and enhancing visual connections with Crescent City Harbor and Elk Creek*. The General Development Plan was adopted by Crescent City Council and approved by the Tolowa Dee-ni' Nation and Elk Valley Rancheria in 2023.

Phase 1A of the Beachfront Park Improvements Project included a Pump Track and new pathways connecting adjacent streets. A Notice of Exemption (SCH 2023120756) was filed to cover construction activities related to the Pump Track and this project is mostly completed.

Phase 1B (See Figure 3b and 3c) includes new construction consisting of

- an amphitheater,
- waterfront plaza for farmers markets,
- interpretive trail (i.e., Tolowa Interpretive Trail), including structures for three interpretive nodes and three interpretive stations
- waterfront overlook
- new entryway and signage, improvements to the entry to the Del Norte County Visitor/Cultural Center,
- expansion of the children's play area with inclusive play features,
- 1-mile running/walking loop,
- new restrooms,
- landscape and irrigation improvements,
- various site furnishings, including lighting
- various subsurface utilities.

Phase 1C (Figures 3c and 3d) includes improvements along Front Street between Play Street to N Street, as well as several gateway features and planted berms near the gateway features immediately northeast of the park which have been covered separately by a Notice of Exemption (SCH# 2025011077). Phase 1C also covers the plazas for the Tolowa Interpretive Trail, which is reviewed as part of this Initial Study.

Phase 1D (Figure 3c) includes the remodel and renovation of the Del Norte County Visitor/Cultural Center to become the Redwoods Discovery Center. This proposed repurposing will house the National Park Service, California State Parks, Redwood Parks Conservancy as well as the current tenant the Del Norte Chamber of Commerce. This document covers the physical placement/construction activities of exterior improvements for Phases 1D but does not include the operations, as those details are unknown at this time and funding is not secured.

Phase 2 (Figures 3a, 3b, 3c) of the project will include the development of new sports fields in the 22-acre central portion of the park along with connecting paths. This document covers the physical placement/construction activities of improvements for Phase 2 but does not include the operations, as those details are unknown at this time and funding is not secured.

In the future, additional phases may connect Beachfront Park to Battery Point Lighthouse and beyond to Pebble Beach Drive and restoration work daylighting Elk Creek. These two projects are not considered in this environmental document.

1.5. Project Location

Beachfront Park is a 35-acre recreational and open space park facility in Crescent City, Del Norte County, California. The park is bounded by Front Street on the north, Elk Creek on the east, Crescent Harbor on the south, and B Street on the west. Battery Point Lighthouse is ¼ mile west.

The existing park is characterized as a flat and grassy expanse, offering a variety of recreational activities. Existing developments include the Fred Endert Pool, Del Norte County Visitor/Cultural Center, Kid Town, Dog Town, Northcoast Marine Mammal Center, various monuments, three restrooms, picnic shelter, gazebo, soccer fields, disc golf course, picnic tables. Two parking lots, and on-street parking along Howe Drive, and Play Street provide vehicular access. Perimeter sidewalks and paths provide pedestrian and bicycle access. The California Coastal Trail crosses Elk Creek and then runs along the beachfront.

The park surface was created by covering the native mud flat with debris from the tsunami that struck Crescent City resulting from the 1964 Good Friday earthquake in South Central Alaska. Approximately ten feet of rubble fill, topped with 18 inches of sandy fill was pushed over the sea wall at the edge of Front Street. Large concrete chunks provide shoreline armoring along the beach and the Elk Creek Estuary.

1.6. Objectives

The primary objectives of the proposed project are as follows:

- Enhance Beachfront Park with updated facilities and recreational uses to better serve the current and future public
- Implement Phases 1A, 1B, 1C, 1D and Phase 2 of the Beachfront Park Master Development Plan

1.7. Interagency Collaboration and Regulatory Review

The CEQA review process is intended to provide trustee and responsible agencies, as well as the public, with an opportunity to provide input into the project. Trustee agencies are state agencies that have authority by law for the protection of natural resources held in trust for the public. Responsible agencies are those that have some responsibility or authority for carrying out or approving a project; in many instances these public agencies must make a discretionary decision to issue a local permit; funding, or resources that are critical to the project's proceeding.

For this Project, the City of Crescent City ("City") is the lead agency. The California Department of Fish and Wildlife (CDFW), North Coast Regional Water Quality Control Board (NCRWQCB), CalTrans, and California Coastal Commission are responsible and/or trustee agencies. The City has and continues to work with the responsible and/or trustee agencies to ensure that the Project meets applicable policies and requirements.

The Project is expected to be funded through a combination of City funds and grant funding from the State of California. Since 2020, the City has received California Proposition 68 Funding (the Park, Environment and Water Bond) as well as a Statewide Park Program Grant to implement the park improvements.

1.8. Public Review Process

This Draft IS/MND will be circulated to local, responsible, and trustee agencies, interested organizations, and individuals who may wish to review and provide comments on the project description, the proposed mitigation measures, or other aspects of the report. The publication will commence the minimum 30-day public review period per CEQA Guidelines §15105(b).

The Draft IS/MND and supporting documents are available for review at:

- City of Crescent City, 377 J Street, Crescent City, CA, 95531

Electronic Copies of the report are available for review at:

https://www.crescentcity.org/

Written comments or questions regarding the Draft IS/MND should be submitted to the name and address indicated below. Submittal of written comments via e-mail would greatly facilitate the response process.

Bob Brown, Community Development Director
City of Crescent City
377 J Street, Crescent City, CA, 95531
Phone: (707) 464-7483
Email: bbrown@shn-engr.com

2. CEQA Determination

DETERMINATION (to be completed by the lead agency)

On the basis of this evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because ail potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signed: **Date:**

Bob Brown

March 7, 2025

Bob Brown, AICP

Community Development Director

3. Project Description

3.1. Project objective/summary

The City of Crescent City is proposing improvements to Beachfront Park, a waterfront community park and open space situated along Crescent City Harbor and southwest of Elk Creek (see Figures 1 and 2). In 2023, the City approved the Beachfront Park General Development Plan (City of Crescent City 2023 in order to activate underutilized portions of the park to better serve local residents and establish the park as a destination for the region, while conserving the park's natural setting and enhancing visual connections with Crescent City Harbor and Elk Creek.

The Proposed Project implements Phases 1A, 1B, 1C and the exterior construction of Phase 1D and Phase 2 of the General Development Plan:

Phase 1A included completion of a Pump Track and a pathway connecting D Street to Battery Street and then down to the intersection of Battery Street and Howe Drive (see Figures 3 and 3a). The Pump Track received de minimis waivers in 2023 and 2024 from the California Coastal Commission, and work began in Summer 2024 with the import of fill material from the Front Street improvements as well as paving/signage. The facility is in operation and open to the public. The remaining work to be completed for the Pump Track (a new four-stall restroom and connecting paths) is included as part of the Proposed Project, and as well as completing a 1-mile running/walking loop (as part of Phase 1B). Potential impacts related to this work are analyzed in this Initial Study.

Phase 1B elements include an amphitheater (i.e., stage and elevated grassy berm for seating), waterfront plaza, waterfront overlook plaza, interpretive trail (i.e., Tolowa Paths of Culture), new entryway and signage, expansion of the children's play area with inclusive play features, two new four-stall restroom, landscape and irrigation improvements, various site furnishings (e.g., benches, bike racks, signage, etc.), parking lot upgrades, limited new bollard lighting, and various subsurface utilities (see Figure 3, 3b, and 3c). The waterfront plaza is designed to host events such as a recurring farmers' markets while the amphitheater will offer seasonal outdoor performances. The amphitheater backdrop will be lowered when not in use. Finally, park redevelopment will enhance the California Coastal Trail by incorporating stories of the Tolowa people using three interpretive nodes along the portion of the trail running parallel to Elk Creek. An additional three temporary interpretive stations will be placed along Howe Drive.

Phase 1C elements include improvements along Front Street from Play Street to Highway 101 (N Street). Two gateway features will be placed: one between L and M Streets, and one just west of L Street. Eight planted berms are proposed (four of which are located in the CalTrans Right-of-Way) as features to help direct attention toward the gateway features and tie thematically to landforms proposed for the park. The berms are inspired by the landscape and dune forms of Tolowa Dunes State Park, north of Crescent City. A Notice of Exemption (SCH #2025011077) was filed for this portion of the Project to coincide with available funding.

A reconfiguration of the entry to the Del Norte County Visitor/Cultural Center is being planned as part of Phase 1C with a ground level entry to the building and a plaza replacing the current Porte Cochere (see Figure 3, 3b and 3c). A second smaller plaza will mark the beginning of the Tolowa Interpretive Trail.

Phase 1D includes the remodel and renovation of the Del Norte County Visitor/Cultural Center to become the Redwoods Discovery Center. This proposed repurposing will house the National Park Service, California State Parks, Redwood Parks Conservancy as well as the current tenant the Del Norte Chamber of Commerce. Because funding sources have not yet been identified for the proposed renovation of the Del Norte County Visitor/Cultural Center and the time horizon for implementation is

uncertain, this document covers the physical placement/construction activities of these improvements but does not include the operations, as those details are unknown at this time.

Phase 2 of the project, which will include the development of new sports fields in the central portion of the park to replace the existing playing fields along with connecting paths. This document covers the physical placement/construction activities of these improvements but does not include the operations, as those details are unknown at this time and funding is not secured.

Future phases not evaluated in this IS/MND

The Beachfront Park General Development Plan contemplates additional phases for possible future action; however, they are not currently funded and therefore are not evaluated in this IS/MND (see Section 3.5). These include connecting Beachfront Park to Battery Point Lighthouse and beyond to Pebble Beach Drive and restoration work daylighting Elk Creek. These projects are not considered in this environmental document; these are separate and disconnected activities of the proposed Project and would be speculative to consider.

This IS/MND therefore addresses the proposed elements under Phases 1A, 1B, 1C and partially 1D and Phase 2 (discussed in more detail in Section 3.7 below).

3.2. Project location

Beachfront Park is a 35-acre public recreational and open space located in Crescent City, California, approximately four miles southwest of the junction of U.S. Highway 101 and U.S. Highway 199, in northwest Del Norte County (see Figures 1 and 2). The Project site is located on the southern edge of Crescent City, bounded by Front Street to the northwest, Elk Creek to the northeast, Crescent City Harbor to the southeast, and B Street to the southwest. Approximately ¼ mile southwest of Highway 101, the park is accessible from Stamps Way and Play Street (via Front Street), which bisect the eastern portion of the park. Battery Street/Howe Drive runs the southern perimeter of the park along the harbor and ultimately intersects with B street on the western edge of the park (see Figure 2). The Project site is located entirely within the California Coastal Zone. Portions of the project, particularly improvements within the Front Street right-of-way (Phase 1C) that are outside this parcel are included for informational purposes

Uses immediately surrounding the Project area include a brewery/restaurant, residential apartments, and a fuel and home heating oil delivery company, and various commercial businesses to the north; the Lighthouse Cove Recreational Vehicle Park to the east; and the Crescent City Wastewater Treatment Plant to the west. The Battery Point Lighthouse, which is listed on the National Register of Historic Places, is approximately ¼ mile west of the park.

Figure 1:
Project Regional Vicinity

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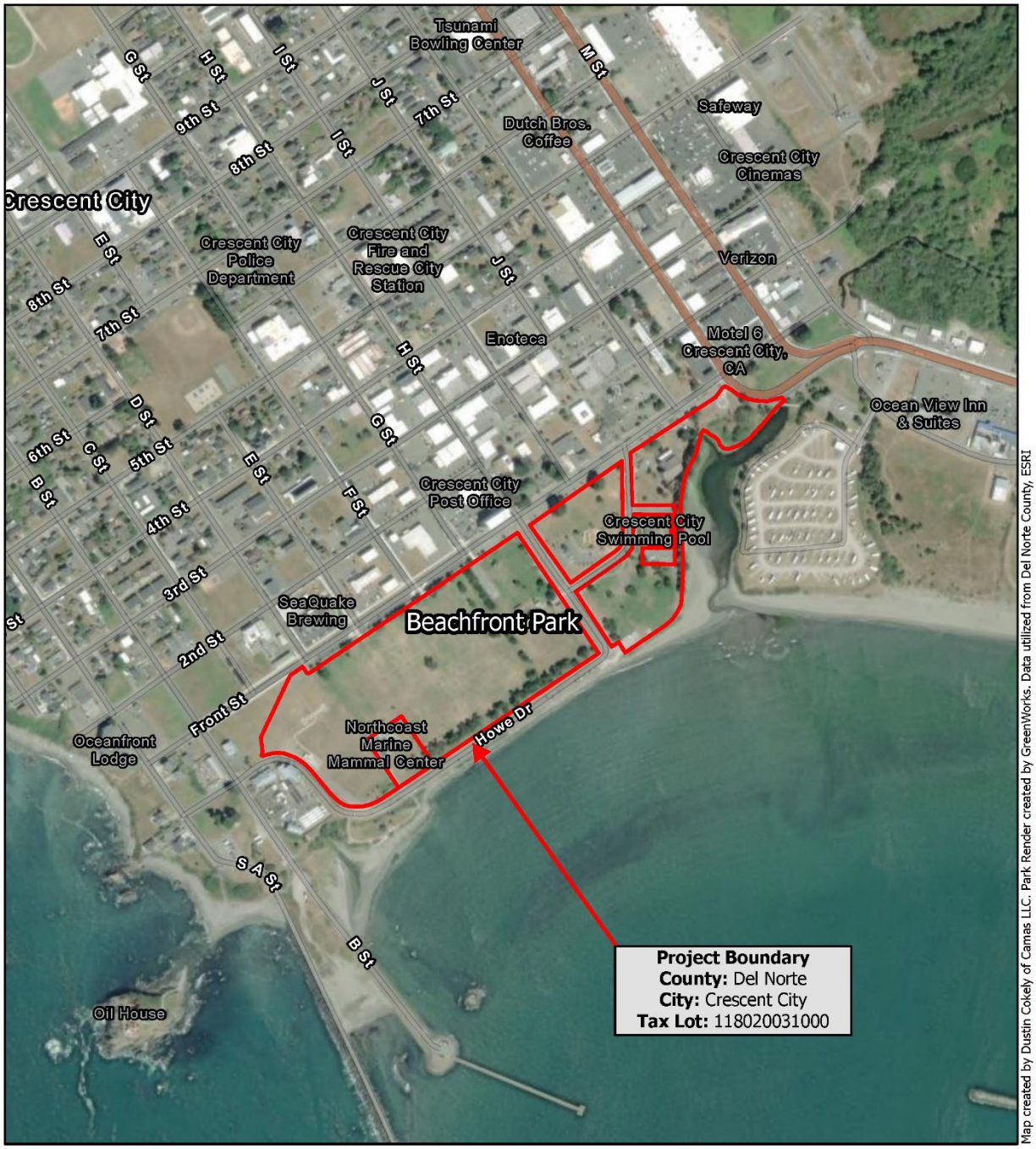

Figure 2:
Project Location

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Phase 1A
Phase 1B
Phase 1C
Phase 1D
Phase 2

Figure 3:
General Development Plan
(Project Phasing)

1 Inch = 220 Feet
0 125 250 500 Feet

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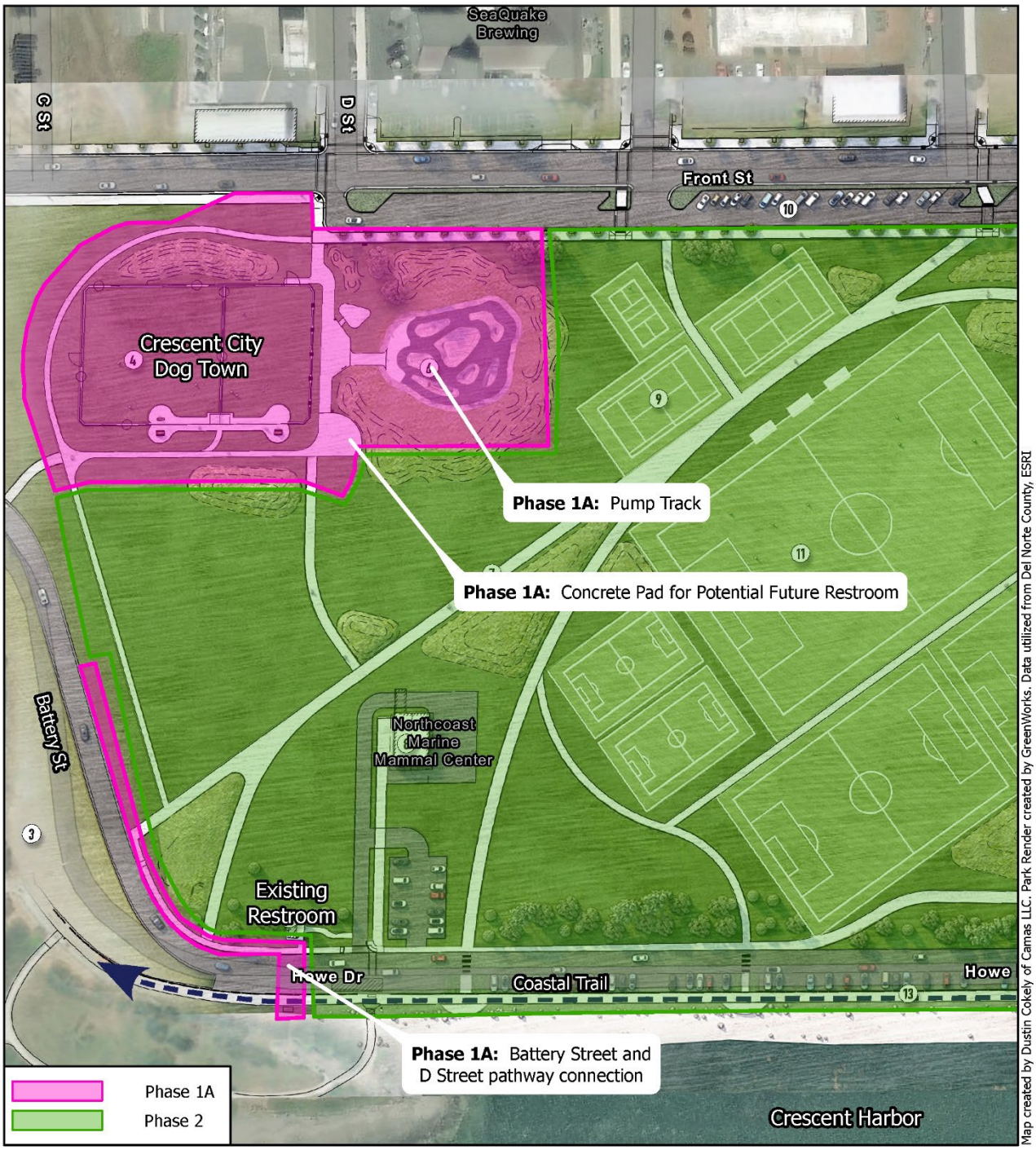
Environmental Regulatory Professionals



N

Scale: 1in = 125ft

0 75 150 300 Feet

Figure 3a:
General Development Plan

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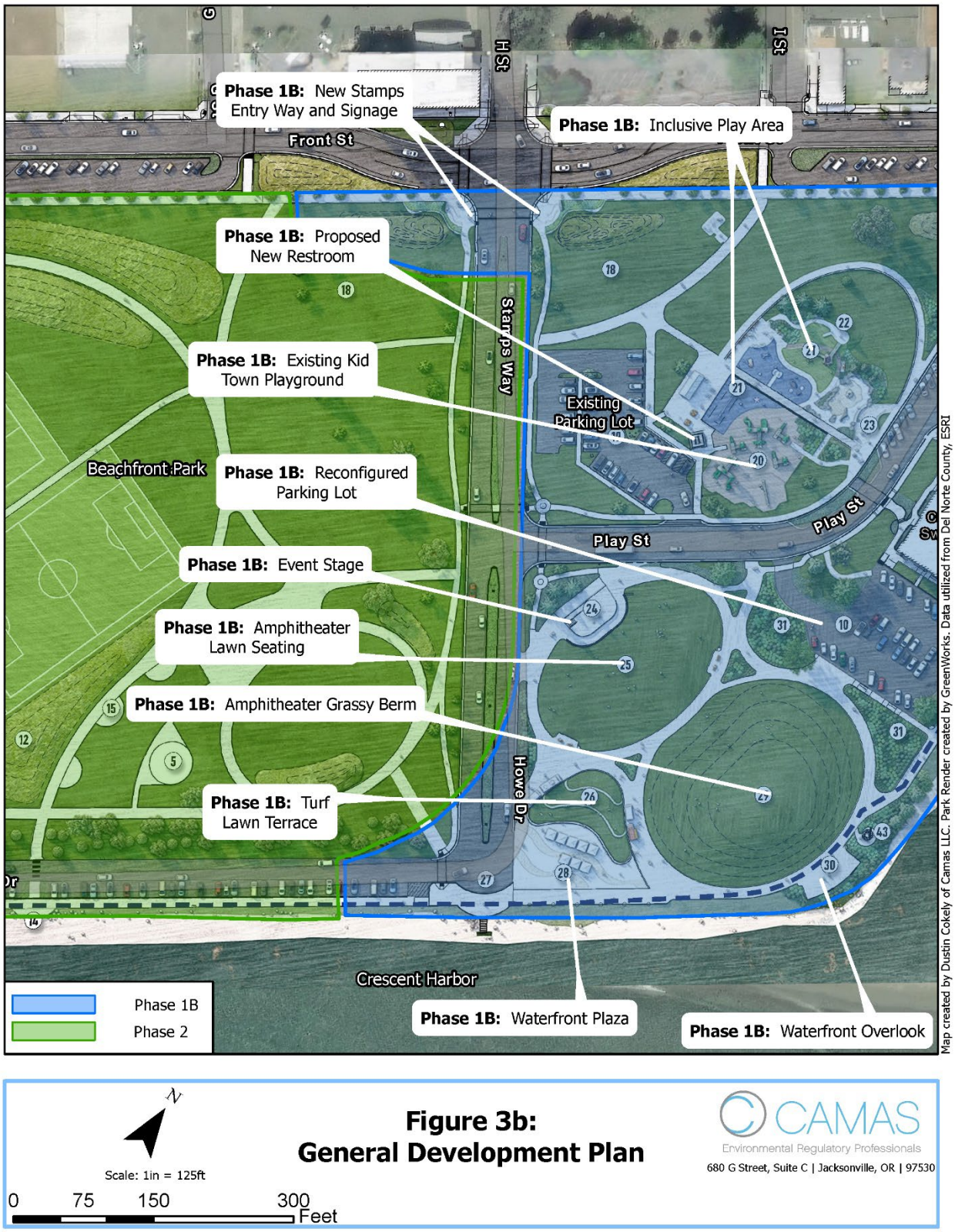

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Scale: 1in = 125ft

0 75 150 300 Feet

Figure 3b:
General Development Plan

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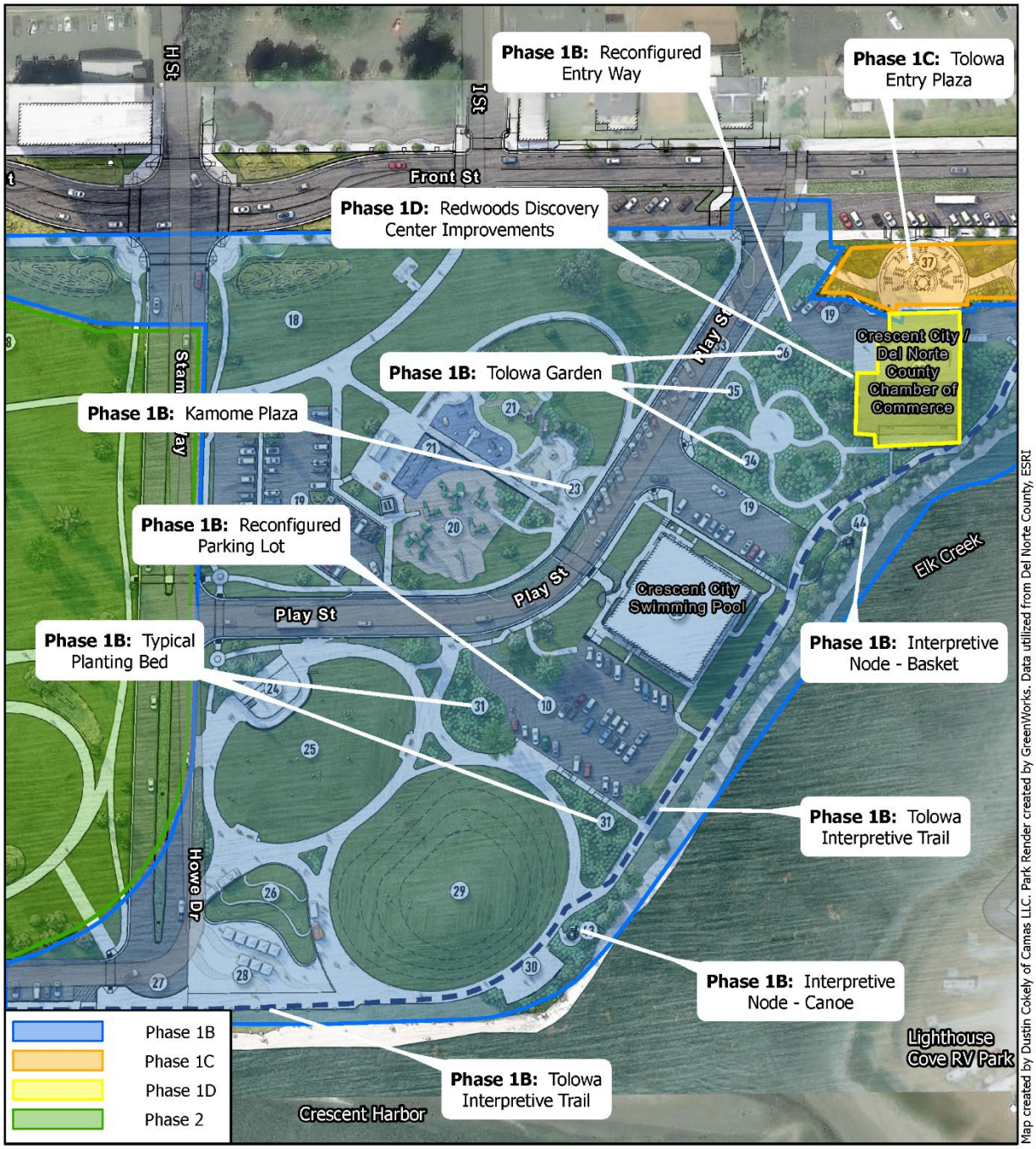

Figure 3c
General Development Plan

Scale: 1in = 125ft
0 75 150 300 Feet

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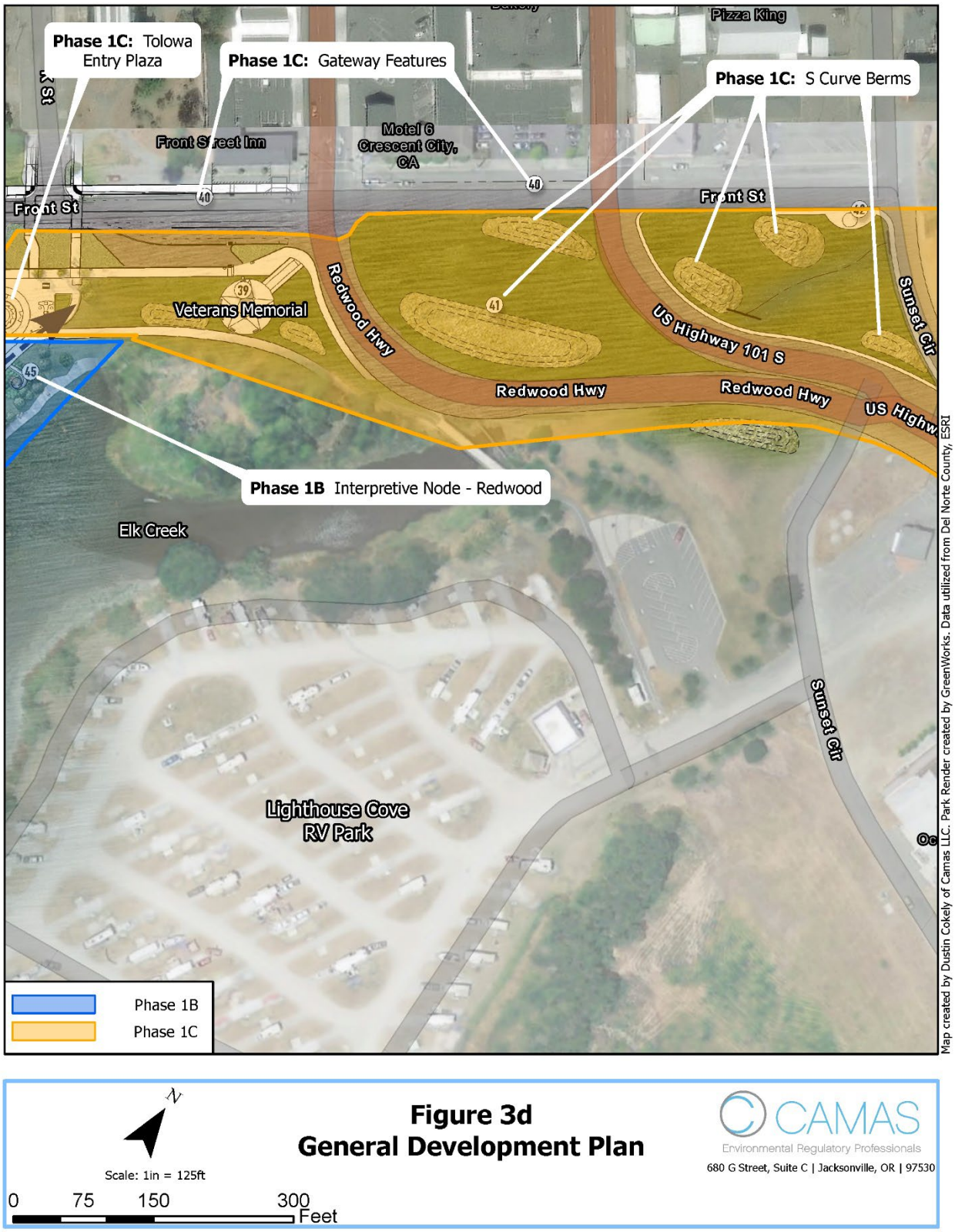
*Tolowa Garden may occur at a later phase


Phase 1C: Tolowa Entry Plaza
Phase 1C: Gateway Features
Phase 1C: S Curve Berms
Phase 1B Interpretive Node - Redwood
Pizza King
Front Street Inn
Motel 6 Crescent City, CA
Front St
Veterans Memorial
Redwood Hwy
US Highway 101 S
Sunset Cir
Elk Creek
Lighthouse Cove RV Park
Phase 1B
Phase 1C
Map created by Dustin Cokely of Camas LLC. Park Render created by GreenWorks. Data utilized from Del Norte County, ESRI

N
Scale: 1in = 125ft
0 75 150 300
Feet
Figure 3d
General Development Plan
CAMAS
Environmental Regulatory Professionals
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3.3. Background and Need

Recognizing the need to enhance Beachfront Park to better serve local residents, the City began the Beachfront Park Master Plan. This effort was originally conceived in 2012 through a community input process, and was adopted by the City Council in 2013, and later updated in 2020-2021. The Master Plan identified several elements to include in an initial buildout phase, which included upgraded picnic facilities and improved soccer fields, new basketball, pickleball, tennis, and volleyball courts, a pump track and BMX jump line, labyrinth, landscape improvements and various cultural elements, among other features. In 2021 the City approved the Beachfront Park Master Plan improvements (Resolution 2021-07). A CEQA Notice of Exemption for construction of the improvements in the Master Plan was posted at that time at the Del Norte County Clerk's office. Since 2020, the City has received California Proposition 68 Funding (the Park, Environment and Water Bond) as well as a Statewide Park Program Grant to implement the park improvements.

In 2023, a General Development Plan (see Figures 3, 3a-3d) was prepared that incorporates the key elements of the 2020 Master Plan, with various modifications to the overall site layout to establish stronger connections with Elk Creek and Crescent City Harbor, to better contextualize the park with surrounding natural elements, and to make a connection along Front Street to Highway 101. The General Development Plan was accepted by the Crescent City Council and approved by the Tolowa Dee-ni' Nation and Elk Valley Rancheria in March 2023.

3.4. Relationship with other projects

3.4.1. Front Street Improvements

The Front Street Improvements project includes both subsurface infrastructure improvements as well as landscape, street modification and roadway design modifications for vehicles, pedestrians, and bicyclists. Most recently the project includes Front Street between Play and N Streets, outside of the northern perimeter of Beachfront Park. These improvements are separate from the elements to be included under the Proposed Project, and associated impacts related to those improvements were addressed under separate environmental reviews (SCH# 2025011077). Such improvements will, however, functionally enhance Beachfront Park by providing safer pedestrian, bicyclist, and vehicle access. The Front Street Improvements project began in 2020 and is anticipated to be completed in 2025.

3.4.2. Beachfront Park Pump Track

Based on requirements associated with the grant funding for the pump track, currently in the northwest corner of the park (see Figure 3a), the initial phase of work began in summer 2023 with the import of fill material from the Front Street improvements and completed in fall 2024. Potential impacts related to construction were considered under a separate environmental review. A Notice of Exemption (SCH #2023120756) was filed to cover construction activities related to the Pump Track and this project is mostly completed.

3.5. Future Phases

The City of Crescent City envisions three future phases after implementation of the Proposed Project (Phase 1)[1]. Phase 2 will add new paths, reconfigure the soccer fields, add basketball and pickleball courts and additional picnic facilities, create a labyrinth, and is anticipated to complete the Tolowa Garden. However, because Phase 2 elements are similar to those analyzed under Phase 1, this document covers the physical placement/construction activities of these improvements but does not include the operations, as those details are unknown at this time and funding is not secured.

Phase 3 is anticipated to daylight Elk Creek between Highway 101 and N Street. Improved connections from Beachfront Park to Battery Point Lighthouse and beyond to Pebble Beach Drive are envisioned as Phase 4. Because funding sources have not yet been identified for these future phases and the time horizon in which such phases would be implemented is uncertain, this IS/MND addresses the proposed elements under the Phase 1A, 1B, 1C and 1D scope of work (i.e., Proposed Project).

3.6. Existing Conditions

Beachfront Park was established after the 1964 Tsunami (triggered by the Good Friday Earthquake in South Central Alaska) that struck Crescent City. Downtown Crescent City suffered extensive damage and all the rubble from the tsunami damage was pushed over the Front Street seawall onto the mudflat. Prior to construction of the park, approximately 18 inches of sandy fill was placed over the debris. Evidence of the tsunami damage remains with large concrete chunks and riprap providing shoreline armoring along the beach and the Elk Creek Estuary.

Beachfront Park is characterized as a flat and grassy expanse, landscaped with mature Monterey pine and Monterey Cypress trees around the northern and eastern perimeter, both of which are listed as rare and endangered plants on the California Native Plant Society (CNPS) Inventory of Rare Plants. A small number of Coast redwoods are also interspersed throughout the park, which struggle with the high salt content present in maritime fog. The park provides habitat for various species of plants and wildflowers, including Wolf's evening primrose (*Oenothera wolfii*), a flowering plant native to the coastline of southern Oregon and northern California, which is also listed as a rare and endangered plant on the CNPS Inventory of Rare Plants. A botanical survey for Wolf's evening primrose was conducted in summer 2023 and Figure 4 shows the locations of the identified plants, including both native and invasive/hybrid specimens.

Existing park elements include the Kid Town playground, Crescent City Dog Town (dog park), Fred Endert Municipal Pool (indoor public pool), Del Norte County Visitor/Cultural Center, Northcoast Marine Mammal Center, picnic shelter and concrete tables, gazebo, A-frame picnic structures, fire pits, soccer fields, disc golf course, bike racks, benches, historical markers for the S.S. Emidio and Billy Boone Square, two public restrooms, chain link and wood fencing, and a sea wall.

The park also has two parking lots – one adjacent to the Kid Town playground (corner of Stamps Way and Play Street), and the other serving the Fred Endert Municipal Pool. On-street parking exists along Battery Street/Howe Drive, Stamps Way, and Play Street, in addition to parking lots at the Fred Ender Municipal Pool and Kid Town playground (the park currently has a capacity for approximately 323 vehicles). Perimeter sidewalks and paths provide pedestrian and bicycle access to the park, including the California Coastal Trail, a portion of which begins at Elk Creek and runs along Battery Street/Howe Drive until it turns north at A Street near Battery Point. The Crescent City Wastewater Treatment Plant sits just outside the southwest boundary of the park between Battery Street/Howe Drive and B Street.

Project Boundary
Wolf's Evening Primrose - Native
Wolf's Evening Primrose - Invasive / Hybrid
Wolf's Evening Primrose - Non-Flowering
Wolf's Evening Primrose - Non-Detect

Figure 4
Wolf's Evening Primrose
August 2023 Botanical Survey Results

Scale 1 inch = 200 feet
0 125 250 500 Feet

CAMAS
Environmental Regulatory Professionals

3.7. Proposed Project

The elements comprising each of the Proposed Project sub-phases (i.e., Phases 1A-1D) are summarized here and described in further detail in the following sections. These include Phase 1A: completion of pump track; Phase 1B: Tolowa Paths of Culture, amphitheater and waterfront Plaza, and general park improvements; Phase 1C: Front Street improvements and "S" curve Berms.[2] These components are also depicted in Figures 3 and 3a-3d.

3.7.1. Phase 1A: Completion of Pump Track and Access

3.7.1.1. Pump Track

The Beachfront Park Pump Track consists of an asphalt path with rollers and berms constructed of imported aggregate base fill material source from the Front Street Reconstruction Project adjacent to Beach Front Park (see Section 2.4.1 above). The Pump Track provides riders the opportunity to use a pumping action for propulsion instead of pedaling or pushing. Staging for construction for the Pump Track began in summer 2023, with the import of material (approximately 1,700 cubic yards) from the adjacent Front Street improvement project (see Section 2.4.2 above).

The Pump Track is approximately 18,000 square feet (approximately 7,819 square feet consisting of asphalt), residing east of Dog Town and south of Front Street. A new concrete pad and utility extensions will be constructed to support the future installation of restroom facilities adjacent to the Pump Track. Additional future elements will include a new fence around the Pump Track and paved paths for connected access. The existing Front Street sidewalk will also be extended to provide access to the pump track and the California Coastal Trail, completing a 1-mile loop trail around the perimeter of Beachfront Park (as part of Phase 1B). The paved loop is intended for jogging and walking and would include two outdoor exercise equipment stations along the route. Stormwater from new impervious surfaces would be treated by rain gardens sized to meet California stormwater quality standards.

3.7.2. Phase 1B: Tolowa Paths of Culture, Amphitheater and Waterfront Plaza, and General Park Improvements

3.7.2.1. Tolowa Interpretive Trail and Interpretive Nodes

Currently, the California Coastal Trail traverses the eastern and southern perimeter of Beachfront Park and then routes north near Battery Point, just west of the Project site. The eastern portion of the Coastal Trail would be reconstructed to Stamps Way with the Tolowa Interpretative Trail, a dedicated multiuse path honoring the Tolowa indigenous people. Trail reconstruction would begin just south of the intersection of Front Street and K Street on the northeastern portion of the Project site and would run the eastern and southern perimeter of the park along Battery Street/Howe Drive until it meets B Street.

The trail would be constructed with vehicular concrete paving to allow access for maintenance vehicles and would conform to all national accessibility standards. The trail itself would be approximately 1,200 linear feet and typically 12 feet wide throughout. Three interpretive nodes would be installed along the trail (see Figure 3c and 3d) to educate visitors about Tolowa culture and celebrate their history. These nodes would be in the form of a sculptural redwood tree, burden basket and canoe, with interactive placards (QR codes) explaining their cultural significance to the Tolowa people. Visitors would be able to

[2] Ibid.

physically enter these contemplative spaces, which would be constructed of metal on concrete foundations. The approximate size of the nodes would vary, with the redwood tree at approximately 100 sf, the Burden Basket approximately 96 sf, and the canoe approximately 105 sf. Additionally, three smaller interpretive stations will be installed along the California Coastal Trail as it parallels Howe Drive. These stations will be solar powered and offer a place to rest while listening to the history of the Tolowa culture.

3.7.2.2. Tolowa Botanical Garden

The eastern portion of the Tolowa Botanical Garden would be situated in the northeast portion of the park, just south of the Del Norte County Visitor/Cultural Center along Elk Creek (immediately east of and accessible from the Interpretive Trail) as shown in Figure 3c. The proposed area, currently consisting primarily of turf grass with coniferous trees would be landscaped with new plant beds, each containing native plant forbs, grasses, and shrubs that the Tolowa people traditionally used for medicinal, nutritional, and ceremonial purposes. A concrete walking path would bisect the garden, allowing entry/exit points from the Interpretive Trail. The garden would also include newly planted native tree species, including bay laurel, cascara buckthorn, Douglas fir, and Sitka spruce. The western portion of the garden, to be located on the large lawn adjacent to the Del North County Visitor/Cultural Center, would comprise similar elements with additional plant species and trees.

3.7.3. Amphitheater and Waterfront Plaza

3.7.3.1. Amphitheater

A new outdoor amphitheater would be located immediately south of Play Street and west of the Fred Endert Municipal Pool parking lot (see Figure 3b). Elements would include a mechanical stage canopy, concrete stage and foundation, which would accommodate lighting and sound, near the southeast corner of Stamps Way and Play Street. Lawn seating in front of the central staging area would be accessible via new concrete paths, and would consist of an oval grassy area, approximately 23,500 square feet, and an adjacent 40,200 square foot topographic relief/berm, approximately 8 feet in height, which would provide additional seating on a grass surface and improved views of the harbor. The current location for the amphitheater berm is in a 3-foot depression and the berm would be raised approximately 5 feet above the existing segment of the Coastal Trail.

Fill for the berm will come from dredge spoils from the Harbor Authority (tested and verified safe materials). Together, these two features could accommodate approximately 2,000 people during concerts and events. Stormwater from new impervious surfaces would be treated by rain gardens and filter strips sized to meet California stormwater quality standards. The amphitheater layout is depicted in Appendix D along with photographs of a similar stage/awning structure in Azaelia Park in Brookings, Oregon.

3.7.3.2. Waterfront Plaza

The waterfront plaza (including the “boomerang” shape, farmers market hardscape area, and surrounding pathways for the food trucks to park), approximately 28,000 square feet, would be located immediately southwest of the amphitheater and east of the intersection of Stamps Way and Howe Drive, would include new paved surfacing and curbing, seawalls and turf lawn (see Figure 3b). The space would host regular farmers markets and would include five docking stations for food trucks. Stormwater from

new impervious surfaces would be treated by rain gardens and filter strips sized to meet California stormwater quality standards.

3.7.3.3. Waterfront Overlook

To enhance views of the ocean, a waterfront overlook would be constructed as an extension from the waterfront plaza, overlooking Crescent Harbor (see Figure 3b). The concrete overlook would be approximately 1,800 square feet, with guardrails. Stormwater from new impervious surfaces would be treated by rain gardens and filter strips sized to meet California stormwater quality standards.

3.7.4. General Park Improvements

3.7.4.1. Stamps Way Entry Signage

The Project would include improvements to the park entrance at Stamps Way, at the intersection of Front Street and H Street (see Figure 3b). New elements would include new concrete walls at the southwest and southeast corners of Stamps Way and Front Street, new concrete paving, and new signage to direct pedestrians, bicyclists and motorists. New back lighting would be installed to illuminate the park entry signage and would comply with dark sky requirements.

3.7.4.2. Universally Accessible Inclusive Play Area

A new accessible and inclusive play area would be constructed adjacent to the existing Kid Town play area (see Figure 3b). This area would include soft, poured-in-place rubber surfacing, concrete paving along a semi-circular path, artificial turf, fencing, and picnic tables. New play equipment (e.g., swings, boat, tree, etc.), as well as a water play area (e.g., sand, water pump/channel, boulders, etc.) would also be installed. Stormwater from new impervious surfaces would be treated by rain gardens and filter strips sized to meet California stormwater quality standards.

3.7.4.3. Kamome Plaza

Adjacent to the new play area would be a new plaza featuring a replica of the boat that washed up in Crescent City from the Japanese city of Rikuzentakata in 2013 (see Figure 3b), resulting from the Tohoku earthquake and tsunami that struck Japan two years earlier. The plaza includes the replica boat (which bears the name Kamome in Japanese, or seagull) and would be approximately 1,610 square feet and consist of concrete paving and seatwalls. Stormwater from new impervious surfaces would be treated by rain gardens and filter strips sized to meet California stormwater quality standards.

3.7.4.4. New Restrooms

A new restroom facility is proposed to be installed at Kid Town. The 4-stall restroom building would be approximately 21 feet by 16 feet and would be made of precast concrete or concrete masonry units. The restroom would connect to a sewer main along Howe Drive via new subsurface sanitary lines. Restrooms would also include wall mounted luminaires for visibility and safety. As previously mentioned, a second 4-stall restroom and other improvements will be added adjacent to the Pump Track (see Section 3.7.1.1) when funding becomes available.

3.7.4.5. Parking

Currently, vehicle parking is available at two primary parking lots: a 19,000 square foot lot immediately west of Kid Town (approximately 41 spaces), and a 14,000 square foot lot south of the Fred Endert Municipal Pool building (approximately 25 spaces). There is also a small row of parking (approximately 6 spaces) just west of the Del Norte County Visitor/Cultural Center accessed from Play Street. Additionally, on-street parking exists throughout the Project area along Play Street, Stamps Way, Howe Drive, and along Front Street near the park entrances (a combined total of approximately 228 spaces).

Proposed improvements include removal of the small row of parking west of the Cultural Center (i.e., cutting off and capping the entrance), and the addition of a new bay of parking (approximately 9 spaces) to the south of the Fred Endert Municipal Pool (accessed via Play Street), for a total of 34 spaces and expanded lot size of approximately 17,000 square feet. That entire lot would also be resurfaced with a new asphalt seal. The parking lot west of Kid Town playground (accessed via Stamps Way) would not undergo any changes other than a new asphalt seal. New angled parking may also be added to the existing shoulder of Play Street once it becomes a unidirectional street, with ingress at Front Street and egress via Stamps Way or Howe Street. With these improvements, it is anticipated that the number of vehicle parking spaces would remain the same (or slightly above) as currently exist at the site (see Table 1).

Table 1: Beachfront Park Existing and Proposed Parking

Parking Location	Existing Spaces	Proposed Phase 1	Proposed Overall Project*
Play Street (Street Parking)	40	27	27
Stamps Way (Street Parking)	46	46	66
Kidtown Parking Lot	41	41	41
Gravel Lot	10	0	0
Pool Parking Lot (North)	12	12	12
Pool Parking Lot (South)	25	34	34
Discovery Center Parking	7	7	23**
Howe Drive (Street Parking)	134	131	121
Howe Drive West (Street Parking)	8	8	28
Totals	**323**	**306**	**352**

*Includes proposed parking from subsequent phases, based on General Development Plan
** Includes changes to Front Street associated with Discovery Center

3.7.4.6. Landscaping, Planting, and Irrigation

New landscaping and plantings would occur throughout the park. In general, improvements would include new plant beds and soil (approximately 4-inches in depth), bark mulch, planted berms, native shrubs and groundcovers, and native deciduous and coniferous trees (with minimum 12-inch-deep planting pits for trees). Appendix A shows the proposed planting list and schedule. A key feature will be berms/dune forms based on landforms at the Tolowa Dunes State Park that will be planted with American dune grass (*Leymus mollis*) or meadow barley (*Hordeum brachyantherum*).

Filter strips and rain gardens would also be installed in areas where new paved surfacing would generate additional stormwater runoff. New irrigation lines would be installed for planting beds, lawn areas and

any new trees planted throughout the site. See Section 3.9 for additional details on erosion control and stormwater management during and post-construction.

3.7.4.7. Signage, Lighting and Utilities

New signage would be placed throughout the site, including for traffic and parking, rules and wayfinding, and other informational signs as needed. In addition to the park entry and exterior restroom lighting discussed above, the Project would involve new bollard lighting (at hip level) to illuminate pathways around the amphitheater (all limited to 3000 Kelvin or less). No new overhead lighting would be added to the parking areas beyond what is currently there.

To address new electrical loads (e.g., lighting, needs for amphitheater and waterfront plaza), new pad mounted electrical cabinets will be placed on the northwest and northeast sides and southern portion of the Project site, respectively. Special purpose receptacles in lockable weatherproof enclosures will be mounted on above-grade pedestals for vendors and food trucks on the waterfront plaza and along the waterfront in concrete benches.

Additional subsurface utilities to be installed include new water and sewer lines, storm drains and inlets, electrical conduits and trenching, electrical utility transformers, a branch and secondary conduit system, and supporting appurtenances and infrastructure. The utilities are shown in Appendix B.

3.7.5. Phase 1C: Front Street Improvements, Cultural Center Entryway Reconfiguration and Gateway Features

As part of the gateway/entrance to Beachfront Park, a reconfiguration of the entry to the Del Norte County Cultural Center is being planned with a ground level entry to the building and a plaza replacing the current Porte Cochere. Two gateway features will be placed: one between L and M Streets, and one just west of K Street.

3.7.6 Phase 1D: Redwoods Discovery Center Improvements Facility Renovations

Phase 1D would include the remodel and renovation of the Del Norte County Visitor/Cultural Center to become the Redwoods Discovery Center. This proposed repurposing would house the National Park Service, California State Parks, Redwood Parks Conservancy as well as the current tenant, the Del Norte Chamber of Commerce. This document covers the physical placement/construction activities of these improvements but does not include the operations, as those details are unknown at this time and funding is not secured.

3.7.7 Phase 2: Sports Fields Replacement/ Renovations

Phase 2 (Figures 3a, 3b, 3c) of the project will include the development of new sports fields in the 22-acre central portion of the park, where existing sports fields exisit, along with connecting paths. This document covers the physical placement/construction activities of improvements for Phase 2 but does not include the operations, as those details are unknown at this time and funding is not secured.

3.8. Site Preparation Activities

Prior to construction of any of the Project elements, construction crews will prepare the site as follows.

3.8.1. Demolition:

Various existing park elements and furnishings would be removed, including elements comprising the existing park entrance, select paved areas, curbs, and chain link or wooden fencing throughout the site. It is anticipated that the existing restroom at the Kid Town playground would be demolished. Select furnishings such as aging picnic tables, benches and trash receptacles would also be recycled, reused or disposed of at a landfill. Finally, approximately 45 trees would be removed, consisting of Cypress and Pine species, and primarily located in the Amphitheater area. Appendix C shows the tree removals in the Phase 1B portion of the project. Additional tree removals may be necessary within Phase 1C; however, specific removals have not yet been identified.

3.8.2. Site Preparation, Salvage and Protection:

Portions of the site to be altered will be cleared and grubbed in preparation for new park elements. A number of existing elements will be salvaged for reuse, including the existing site monuments. Trees to remain in place would be marked with protective fencing. All identified native Wolf's evening primrose would be clearly flagged and avoided (see Chapter 3.4, *Biological Resources*, for additional information on measures to protect plant species).

3.8.3. Earthwork:

Excavation depths for project elements would range from approximately 2 to 4 feet. For placement of hardscape surfaces (e.g., walking paths, playground and parking areas) excavation would occur at a depth ranging from 0.5 to 1.5 feet, and 2 to 6 feet for structural elements (e.g., playground equipment, interpretive nodes, restroom, entry walls, etc.). Excavation for rain gardens and filter strips would occur at a depth of 2 to 4 feet. Additionally, new subsurface utilities associated with the Project would be excavated generally from 2 to 4 feet, with a maximum of 10 feet for a sewer line.

Elements such as the Pump Track, playground, walking paths and plaza areas would require grading and placement of imported fill, which would come from tested and approved dredging spoils from Crescent Harbor. This material would also be used to construct the berms near the amphitheater and potentially adjacent to the "S" curves on Highway 101.

3.9. Project Implementation

3.9.1. Summary of Land Disturbance

During construction, approximately 6 acres would be temporarily disturbed, and 6 acres would be permanently disturbed in Phase 1. This would include approximately 6 acres of temporary vegetation community loss and approximately 3 acres of permanent vegetation community loss in Phase 1. An additional 22-acres of existing sports fields will be replaced/renovated with new sports fields. Potential effects to vegetation communities resulting from project operation are described in more detail in Chapter 4.4, *Biological Resources*.

3.9.2. Access and Staging

Beachfront Park will remain accessible to the public during Project construction but with temporary road closures. Throughout 2025, the entrance at Play Street off Front Street, will be temporarily closed during installation of the new road upgrades as well as improvements to the exterior of the Cultural Center (however the park will still be accessible at Play Street via Stamps Way). At this time, Front Street between Highway 101 and I Street will remain closed (along with a small portion of K Street that abuts Front Street). During this period, traffic will be re-routed along 3rd Street and then down H Street in order to access the Park via Stamps Way, as well as at Battery Street via B Street. The portion of the California

Coastal Trail from Hwy 101 to just north of the Fred Endert Municipal Pool will be closed for the duration of construction in 2025 (see Appendix F).

Throughout 2026, the portion of Play street between Stamps Way and the Fred Endert Municipal Pool will be temporarily closed, along with the playground and grassy area south of Play Street and east of Stamps Way (i.e., future site of the amphitheater). Other access to the park via Stamps Way as well as at Battery Street via B Street will remain open, along with a portion of Play Street (just off of Front Street), allowing access to the pool and Del Norte County Visitor Center. However, the portion of the California Coastal Trail from just east of the visitor center down to Stamps Way will remain closed for the duration of construction in 2026 (see Appendix F).

The Project includes two adjoining staging areas to be located in the proposed amphitheater location, which combined would total approximately 70,000 square feet. The northern portion of this area ("Area A") would be used for material storage and as a dry good laydown area (e.g., playground equipment, and other materials such as piping, inlets and signage, ,etc.). The southern portion of this area ("Area B") would be used for stockpiling fill for the amphitheater (e.g., fill storage, stored excavated material, sod, etc.). See Appendix G.

3.9.3. Water use

The estimated water demand during Project construction would be approximately 50,000 gallons over 13 months. Water would primarily be used for dust control, increasing soil moisture content, and irrigation needs for revegetation and/or erosion control. During construction, watering would occur intermittently as required by park elements. Demand is expected to increase during installation of project elements requiring new vegetation and/or grasses. During operation, vegetation would be irrigated via new PVC lines connected to existing service lines. Water efficient sprinklers would be installed and automated for water conservation. It is expected that water usage would decrease from the existing usage as lawn areas would be reduced, planting areas would include less water demand, and some of the irrigation systems would change to more efficient drip irrigation for the plantings.

3.9.4. Electrical Power Needs

Construction equipment, trailers, and security lighting and would require electrical power for operation. It is anticipated that power needed during construction would be provided from adjacent power lines in the park. During operation, demand for power would be limited to bollard, entryway, and restroom lighting, as well as any digital components for the interpretive nodes. Power would also be utilized for food trucks (via docking stations) and for concerts held at the amphitheater. The City anticipates that the park will host approximately 10-15 concerts per year, primarily in the summer.

3.9.5. Materials and Spoils management/disposal

Construction materials would include a mix of concrete, asphalt, rock, engineered fill, dredge spoils and topsoil. Approximate quantities are listed in Table 2 below. Fill material generated from construction of pathways, pump track, playground and plaza areas would be reused onsite to the extent possible.

Table 2: Imported Materials and Quantities

Import Material	**Estimated Quantity**

Engineered Fill	400 Cubic Yards
Dredge Spoils	7,500 Cubic Yards
Concrete	1,500 Cubic Yards
Rock	1,800 Cubic Yards
Topsoil	2,600 Cubic Yards
Raingarden Soil Blend	300 Cubic Yards

3.9.6. Site Clean-up and Waste Disposal

3.9.6.1. Post Construction Site Condition

Upon completion of construction activities, the contractor would repave all damaged surfaces, replace any damaged park furnishings (e.g., fencing, etc.), restore vegetation, and remove all construction materials from the site.

All disturbed areas will be revegetated, and any newly graded, unpaved surfaces will be replanted with native plants per specific planting plans for playground, and waterfront plaza (see Appendix A for planting diagrams).

3.9.6.2. Stormwater Pollution Prevention Plan

Because the Project will involve disturbance greater than 12 acres, the City is required to obtain coverage under the State Water Resources Control Board (SWRCB) Construction Storm Water General Permit and develop a Stormwater Pollution Prevention Plan (SWPPP). The City's construction contractor would implement the SWPPP during Project construction, which would include periodic inspections and monitoring, and installation of the City's Best Management Practices (BMPs) to prevent pollutants, sediment and dust from entering Elk Creek, Crescent Harbor, and the City's storm sewer system.

3.9.6.3. Hazards and Hazardous materials

Hazardous materials anticipated to be used during construction include:

- Diesel fuel
- Lubricating grease
- Gasoline
- Herbicides (as needed)
- Pesticides (as needed)

All hazardous materials would be stored in designated locations away from any potentially sensitive areas (e.g., drainage areas, Elk Creek, playground) in accordance with state and local laws. Storage tanks over 55 gallons or more would require secondary containment. Any herbicides or pesticides for revegetation or pest management would be stored in accordance with applicable local, state and/or federal requirements, and would be stored offsite at a City storage yard.

3.9.6.4. Waste Management

Any materials that cannot be reused onsite (e.g., fill material) or recycled would be disposed of at a licensed disposal facility. During operation, the collection of solid waste and recycling would be provided by Recology Del Norte through the Del Norte Solid Wate Management Authority.

3.9.7. Traffic Management/Access

Equipment and materials would be delivered to the site via the entrances at Stamps Way and/or Play Street via Front Street and Highway 101. Standard traffic control measures would be implemented in accordance with City requirements during construction to avoid interference with traffic flow along Front Street. Such measures could include scheduling major truck trips and deliveries to avoid peak traffic hours, posting warning and detour signs for motorists, setting up temporary lane closure procedures, and placing cones to alert drivers.

During construction, most of the park west of Stamps Way would be accessible to visitors, and ingress/egress will be maintained along Howe Drive. Construction would be phased to result in the least disturbance feasible for park visitors.

3.9.8. Workforce and Equipment

During construction, it is anticipated that a maximum of 20 workers would be onsite throughout construction, and that approximately 950 haul trips would be necessary to deliver/remove materials (per Section 3.9.5 above) and/or bring equipment onsite. The type of equipment that would be required to implement the Proposed Project is anticipated to include:

- Dozer
- Excavator
- Front-end Loader
- Dump Trucks
- Vibratory Roller
- Graders
- Asphalt Paver
- Water Truck

3.9.9. Construction Schedule

Construction of the Proposed Project would last approximately 13 months and is anticipated to begin the spring of 2025 and be completed by summer of 2026. Table 4 includes construction sequencing and duration of activity; however, timelines are preliminary and will be finalized by the construction contractor and the City.

Noise-producing construction activity would generally occur between the hours of 8:00 a.m. and 6:00 p.m., Monday through Friday, per the City of Crescent City's noise ordinance.

Table 4: Construction Phasing

Construction Phase and Activity	Estimated Duration	Timeline
Phase 1A – Pump Track		Completed 8/2024
Phase 1A – Trail Construction		Completed 2/2025
Phase 1B – Site and Equipment Mobilization	1 month	April 2026
Phase 1B – Demo	2 month	May - June 2026
Phase 1B – Grading & Utilities	4 months	July – Oct 2026
Phase 1B – Concrete and Paving	4 months	Aug 26 – Nov 26
Phase 1B – Playground, Interpretive & Planting	3 months	Aug – Oct 26
Phase 1B – Punch List, Clean up, Demobilization	1 month	Dec 2026
Phase 1C – Site and Equipment Mobilization	1 month	June 2025
Phase 1C – Demo	1 month	August 2025
Phase 1C – Grading & Utilities	2 months	Aug – Oct 2025
Phase 1B & 1C – Concrete for all walkways and Tolowa Cultural Trail	2 months	Oct 2025-Mar 2026
Phase 1B & 1C – Interpretive & Planting@ Cultural Center and Tolowa Cultural Trail and Nodes	2 months	Sept 2025

3.10. Permits and Approvals

The permits and regulatory compliance requirements for the proposed Project are described in Table 5 by permitting agency or approval authority.

Table 5 Applicable Permit and Regulatory Requirements

Regulatory Agency	Law/Regulation	Purpose	Permit/Authorization Type
Regional Water Quality Control Board	Clean Water Act (CWA) Section 402	Regulates discharges of pollutants.	NPDES Construction General Permit
California Coastal Commission	Coastal Zone Management Act	Applies to national coastal zone, including shoreline development.	Coastal Development Permit

Regulatory Agency	Law/Regulation	Purpose	Permit/Authorization Type
Native American Heritage Commission / California Native American Tribes	Assembly Bill 52 (AB-52)	The City must consult with California Native American Tribes if tribal cultural resources may be affected by the Project.	Consultation
State Historic Preservation Officer	PRC 5024 & 5024.5	The City must consult with State Historic Preservation Officer if historic or prehistoric resources may be affected by the Project.	Consultation
California Department of Transportation	California Streets and Highways Code (Section 660)	The City must apply for an encroachment permit to access work areas that traverse Caltrans right-of-way.	Encroachment permit
City of Crescent City	Local Policies and Requirements	Ensure compliance with City laws/ordinances for building construction and public safety	Building/ Grading Permit

4. Environmental Checklist

This chapter assesses the Project's environmental impacts based on the environmental checklist provided in Appendix G of the state's CEQA Guidelines. The environmental resources and potential environmental impacts of the Project are described in the individual subsections below. Each section provides a brief overview of the environmental and regulatory setting for each resource topic to help the reader understand the potential effects of the proposed Project. In addition, each section includes a discussion of the rationale used to determine the significance level of the Project's environmental impact for each checklist question. For environmental impacts that have the potential to be significant, mitigation measures are identified that would reduce the severity of the impact to a less-than-significant level. Reference documents reviewed for relevant information are cited as applicable. The analysis considers the long-term, direct, indirect, and cumulative impacts of the proposed Project. Environmental impacts are separated into the following categories:

> *Potentially Significant Impact*. This category is applicable if there is substantial evidence that an effect may be significant, and no feasible mitigation measures can be identified to reduce impacts to a less than significant level. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
>
> *Less Than Significant After Mitigation Incorporated*. This category applies where the incorporation of mitigation measures would reduce an effect from a "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measure(s), and briefly explain how they would reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
>
> *Less Than Significant Impact*. This category is identified when the project would result in impacts below the threshold of significance, and no mitigation measures are required.
>
> *No Impact*. This category applies when a project would not create an impact in the specific environmental issue area. "No Impact" answers do not require a detailed explanation if they are adequately supported by the information sources cited by the lead agency, which show that the impact does not apply to the specific project (e.g., the project falls outside a fault rupture zone). Any "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)

The environmental factors checked below would potentially be affected by the Project, as discussed in the sections that follow but all are found to be less than significant with mitigation.

☒	Aesthetics	☐	Agriculture and Forestry Resources	☒	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☐	Geology / Soils	☐	Greenhouse Gas Emissions	☒	Hazards & Hazardous Materials

☐	Hydrology / Water Quality	☐	Land Use / Planning	☐	Mineral Resources
☐	Noise	☐	Population / Housing	☐	Public Services
☐	Recreation	☐	Transportation	☒	Tribal Cultural Resources
☐	Utilities / Services	☐	Wildfire	☒	Mandatory Findings of Significance

4.1. Aesthetics

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental and Regulatory Setting

The Project site is located approximately four miles southwest of the junction of U.S. Highway 101 and U.S. Highway 199, in northwest Del Norte County. It is situated along Crescent Harbor, between Elk Creek and the Pacific Ocean. Within the project vicinity, scenic resources include views of the Pacific Ocean to the south and west, including the Battery Point Lighthouse, the Redwood National and State Parks and Six Rivers National Forest to the east. Views to the north are mostly obscured by residential and commercial buildings. The topography of the Project site is relatively flat, and vegetation primarily consists of grasses and mature Monterey pine and cypress trees, and a small number of coast redwoods. The Project site is bounded by Front Street to the north, the Battery Park lighthouse and B Street Pier to the west, Crescent City Harbor to the south, and Elk Creek and the Lighthouse Cove RV Park to the east.

The Crescent City General Plan (CCGP) and Local Coastal Plan (LCP) identify several coastal scenic resources within the planning area, including coastal vista points, coastal scenic view corridors and coastal historic scenic resources. The following sites are within or in the vicinity of the Project area: Battery Point, the B Street Pier, Elk Creek Bridge, and Fisherman's Memorial (at Citizen's Dock).

The LCP provides the following related to aesthetics and scenic resources:

> Goal 5.E: To encourage the maintenance of the visual and scenic beauty of Crescent City.
>
> Policy 5.E.1: The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to: (a) protect views to and along the ocean and scenic coastal areas, including, but not limited to, the

scenic resources identified in Table 5-3; (b) to minimize the alteration of natural land forms; (c) to be visually compatible with the character of surrounding areas; and (d) where feasible, to restore and enhance visual quality in visually degraded areas. New development in designated highly scenic areas shall be subordinate to the character of its setting.

Policy 5.E.7. All public facilities and new development shall be required, whenever feasible, to use low-energy shielded lights with a downward directed cast for better efficiency and to minimize nighttime glare.

Discussion of Impacts

a. Have a substantial adverse effect on a scenic vista?

The Project site and designated scenic resources will be visible to the general public from surrounding streets and sidewalks as well as recreationists utilizing portions of the park and adjacent areas that will continue to be accessible during construction, including bicycle lanes and sidewalks on Front Street, pedestrian areas around the Battery, as well as the B Street Pier. Construction equipment and materials will be stored in either of the two staging areas depending on which element of the Project is under construction. Construction equipment and material stockpiles would be visible to park users and motorists on Front Street and other nearby local streets. As such, the presence of equipment and materials could temporarily impair views of the Pacific Ocean and Battery Point Lighthouse; however, given that the duration of construction will be short-term, the nature of construction activities (e.g., playground upgrades, cultural trail, landscape improvements, earthworks, etc.), and construction phasing (elements of the projects will not be constructed simultaneously), the effects on scenic vistas during construction would be less-than-significant.

The Project will both enhance existing park features and construct new amenities that will improve the quality of the park for residents and visitors alike. Existing beach access points will not be modified or removed while various recreation areas (Phase 1A and 1B elements) will be developed or updated, including the constructed Pump Track, new pathways connecting adjacent streets, small plazas, an amphitheater, waterfront plaza for farmers markets and Tolowa Interpretive Trail, expansion of the children's play area with inclusive play features, and completion of a 1-mile running/walking loop. Other features include a new entryway and signage, two new restrooms, landscape improvements, various site furnishings (e.g., benches, bike racks, signage, etc.), parking lot upgrades, limited new lighting, and various subsurface utilities, as depicted in Figure 3d. Park redevelopment will also enhance the California Coastal Trail by incorporating stories of the Tolowa people using three interpretive nodes along the portion of the trail running parallel to Elk Creek. An additional three temporary interpretive stations will be placed along Howe Drive. The Project also includes removal of a number of landscaped Cypress and Pine trees. With the proposed upgrades, views of the park setting will be enhanced and views of the harbor will increase from tree removal, trail improvements and the elevated berm placed as part of the amphitheater. Throughout the Beachfront Park views will generally remain the same as they currently exisit.

Finally, Phase 1C elements include reconfiguration of the entry to the Del Norte County Visitor/Cultural Center (including ground level entry to the building a plaza replacing the current Porte Cochere, see Figure 3, 3c, and 3d). While reviewed separately under CEQA SCH# 2025011077, along the Front Street corridor there will be installation of two gateway features (one between L and M Streets, and one just west of K Street), and eight planted berms along the “S curves” on Highway 101 to help direct attention toward the gateway features and tie thematically to landforms proposed for the park.

Given the scale and location of the Proposed Project elements, none would alter views of the historic Battery Point Lighthouse, west of Beachfront Park. The proposed amphitheater stage area would include a concrete stage and foundation, and a mechanical canopy (approximately 21 feet in height when raised) near the southeast corner of Stamps Way and Play Street (see Appendix D). The canopy would typically be raised during events and concerts. The proposed amphitheater seating area would consist of an expanded grassy berm area from which concertgoers can view the stage, approximately 8 feet in height; however, because there is an existing 3-foot depression in the location of the proposed amphitheater berm, the berm itself would only rise to approximately 5 feet above the existing path (i.e., Coastal Trail), thus preserving the view corridor of the harbor between the proposed plaza and amphitheater. Further new lookout points along the water to the south and east of the amphitheater, including from the berms itself, will offer new and enhanced vantage points from which to view the harbor and ocean. Finally, the two gateway structures, consisting of concrete and steel and be approximately 15-20 feet in height, would be located along Front Street adjacent to and northeast of the Cultural Center.

While the majority of trees would remain onsite and be protected according to the Project's Tree Protection and Removal Plan (see Appendix C), construction of certain elements would involve removal of approximately 45 trees, mostly cypress and pine species, but which would include select Monterey Cypress. However, any tree removal would be subject to the City's approval, and removal of any Monterey cypress would be done in compliance with the City of Crescent City's Code of Ordinance § 12.34.30, which would involve 2:1 replacement (see Chapter 4.4, *Biological Resources*).

Thus, given most Project elements primarily include landscape improvements or park infrastructure (e.g., non-enclosed structures) that would not obstruct views, or those that would enhance views (e.g., berms, pathways and overlooks), and that trees would be protected and/or removed in compliance with the City's requirements, the overall project would enhance the overall scenic environment of the park itself and harbor area, and impacts to scenic vistas would be less than significant.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The Project would not substantially impact scenic resources. The Project site is located just west of Highway 101, a portion of which is designated as a scenic highway. However, the Project would not impact scenic views from the highway. As described in 4.1a above, several trees will be removed within the Project area, however, this would be done subject to the City's approval and in compliance with Crescent City Municipal Code. Further, the Project's various landscape improvements and tree plantings would improve the overall visual quality of the park. There are neither historic buildings nor rock outcroppings within the park. The Battery Point Lighthouse, just west of the Project site, is the only designated nearby historic resource; however, as described in 4.1a, none of the proposed park improvements would impede any public views. Therefore, impacts to scenic resources would be less than significant.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The Project is located in an urbanized area on the southern edge of Crescent City, and offers views of Crescent City Harbor, the Pacific Ocean, and Battery Point Lighthouse. Construction activities occurring within Beachfront Park would be visible from Front Street, B Street, as well as by recreationists using the park, including portions of the California Coastal Trail. The presence of construction equipment and

stockpiled materials may temporarily impair the quality of public views within and in the vicinity of the Project area, and the visual character of the park. However, the Project's construction timeframe would be temporary and short in duration (i.e., approximately 13 months). Thus, construction-related impacts on the visual character and quality of public views of the Project area would be less than significant and would not conflict with the CCGP and LCP goals.

Once complete, the proposed park improvements would not alter views of the Battery Point Lighthouse or significantly alter views of the harbor or ocean. As previously described, the proposed amphitheater berm itself would only rise to approximately 5 feet above the existing path (i.e., Coastal Trail), thus preserving the view corridor of the harbor between the proposed plaza and amphitheater. Further, the many of the proposed park elements would include new and enhanced views from which to view the ocean and harbor.

Limited nighttime lighting, primarily at the park entrance, restrooms and bollard lighting (at hip level) to illuminate pathways, would be fleetingly visible to motorists, pedestrians or bicyclists on Front Street. Additionally, the limited nature of this lighting would not degrade park's scenic quality and would not conflict with zoning or other regulations. The Project would thus maintain scenic vistas and increase the overall quality and visual character of the area by offering new ocean-viewing vantage points for visitors, consistent with the City's General Plan and Local Coastal Plan goals and policies. Therefore, the impacts would be less than significant.

d. **Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

Existing sources of nighttime light and daytime glare are present in and around the Project site, including streetlights along Front Street, Play Street, and Stamps Way, as well as parking lot lighting from adjacent residential and/or commercial uses. During the day, minimal glare may occur from sunlight reflecting off parked cars or the windows and roofs of existing structures. Project construction would typically occur between 7:00am and 5:00pm, Monday through Saturday, per the City's Noise Ordinance, and would thus not require new light sources.

Limited new lighting is planned for park entry signs, exterior restroom lighting, bollard lighting (at hip level) to illuminate pathways around the amphitheater. No new overhead lighting would be added to the parking areas beyond what is currently there. Thus, the overall source of nighttime lighting would not significantly change from current conditions and would not pose a nuisance to motorists driving by or bicyclists and pedestrians using adjacent bike lanes and sidewalks. Additionally, the Project would not create a substantial change in visual contrast with the night sky beyond current conditions. Therefore, impacts related to glare and nighttime lighting would be less than significant.

4.2. Agriculture and Forest Resources

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and	☐	☐	☐	☒

Monitoring Program of the California Resources Agency, to non-agricultural use?				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Environmental and Regulatory Setting

The Project is located immediately south of downtown Crescent City adjacent to the harbor. The Project site is zoned Coastal Zone - Open Space District (CZO) and does not contribute to agricultural or forestry production in the area. The closest agriculturally zoned property is approximately 0.5 miles to the northeast outside of Crescent City limits, in an Agricultural General District (AG-5) under the Del Norte County General Plan. Similarly, the closest forestland zoned property is approximately 0.75 miles to the northeast outside of Crescent City limits, in a Timberland Preserve District (TPZ) under the Del Norte County General Plan. The Project site does contain farmlands of statewide importance.

The Crescent City Local Coastal Plan includes among its planning principles and goals the protection and enhancement of agriculture (Policies 1.B.3, 4.A.1, 4.A.3, 5.D.11).

Discussion of Impacts

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The Project is in an urban area on the southern edge of the City of Crescent City, adjacent to Crescent City Harbor. No land within or adjacent to the Project is classified as farmland by the Farmland Mapping and Monitoring Program. Thus, no Prime, Unique or Farmland of Statewide importance would be converted to a non-agricultural use, and therefore no impact would occur.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No agricultural land is located within the Project area. The Project site is currently zoned as Coastal Zone – Open Space (CZO) and will continue to be used as open space and as a public park. There is no zoning for agricultural use on or in the vicinity of the Project site. The Project site is not located in an area enrolled in a Williamson Act contract. Therefore, the Project would not conflict with zoning for agricultural use or Williamson Act contracts, and therefore no impact would occur.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The Project site is currently zoned as Coastal Zone – Open Space (CZO) and does not include forest or timberland zoning designations. As such, the Project would not conflict with zoning for, or cause the rezoning of, forest land, timberland or timberland zoned Timberland Production lands. Therefore, no impact would occur.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

The Project area does not contain forest land and, as such, would not result in the loss of forest land or conversion to non-forest use. The proposed Project would enhance and beautify an existing park, through landscape, recreation and design improvements. Therefore, no impact would occur.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. See responses to 4.2a-d above.

4.3. Air Quality

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Environmental and Regulatory Setting

California is divided into 15 air basins by EPA Region 9. Each air basin is managed by at least one air quality management district (AQMD) that is responsible for identifying and implementing air quality strategies to comply with ambient air quality standards. Air quality conditions in the AQMD are compared to ambient air quality standards set at the federal level (i.e., National Ambient Air Quality Standards, or NAAQS) and at the state level (i.e., California Ambient Air Quality Standards, or CAAQS), and attainment status is reported for criteria pollutants, including: Particulate Matter (PM_{10} and $PM_{2.5}$),

Ozone (O_3), Nitrogen Dioxide (NO_2), Sulfate Carbon Monoxide (CO), Sulfur Dioxide (SO_2), Visibility Reducing Particles, Lead, Hydrogen Sulfide ($H2_S$), and Vinyl Chloride (CARB 2023).

The Project is within the North Coast Air Basin (NCAB), which extends from Sonoma County to the Oregon border. The North Coast Unified Air Quality Management District (NCUAQMD) manages the NCAB within Del Norte, Humboldt and Trinity counties. The NCAB is listed as "attainment" or designated "unclassified" for all state and federal ambient air quality standards, with the exception of suspended particulate matter (PM_{10}) in Humboldt County only (NCUAQMD 2023). An area is designated in "attainment" if the state standard for a specified pollutant has not been violated over a three-year period.

The NCUAQMD monitors air quality in the vicinity of the Project at the Crescent Elk Middle School monitoring station located at 994 G Street in Crescent City. The NCUAQMD has not adopted significance thresholds, but rather utilizes the Best Available Control Technology (BACT) emission rates for stationary sources[3]. Similarly, NCUAQMD has not adopted thresholds for toxics, and defers to the latest version of the California Air Pollution Control Officers Association's "Health Risk Assessments for Proposed Land Use Project" to evaluate and reduce air pollution impacts from new development (NCUAQMD 2023).

In determining whether a project has significant air quality impacts on the environment, planners typically apply their local air district's thresholds of significance to projects in the environmental review process. However, the NCUAQMD has not formally adopted significance thresholds for land use or infrastructure projects. As such, the stationary source thresholds in District Rule 110 (New Source Review and Prevention of Significant Deterioration) are often used in environmental documents for the purposes of determining whether potential impacts from construction and operation of a project would be significant (NCUAQMD 2015).

Discussion of Impacts

a. Conflict with or obstruct implementation of the applicable air quality plan?

Construction activities associated with the proposed Project will require temporary construction worker trips to and from the Project site, and the use of construction equipment. Such equipment would produce emissions consistent with park renovation projects including diesel engine exhaust and limited particulate matter. Construction of the proposed Project elements is estimated to take approximately 13 months, much of which would be conducted during the dry season. Construction would involve grading, minor earthworks, paving, fencing and installation of signage and lights. Hand tools will also be used for landscape improvements and plantings. The total area disturbed would be approximately 5 acres. Given that construction would be temporary and short-term and would comply with all applicable federal and state regulations for sources of air pollutants to comply with BACT emission rates for stationary sources (per ACUAQND guidance), the Project would not conflict with any air quality plan. Therefore, the impact will be less than significant.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

[3] As defined and listed in the NCUAQMD Rule and Regulations, Rule 110 - New Source Review (NSR) And Prevention of Significant Deterioration (PSD), Section 5.1 - BACT (pages 8-9)

The Project is located in the North Coast Air Basin which is listed as in "attainment" or designated "unclassified" for all state and federal ambient air quality standards, with the exception of suspended particulate matter (PM_{10}) in Humboldt County only (NCUAQMD 2023). Given the project's location in Del Norte County, the limited and temporary emissions from construction activity would therefore not contribute to any net increases in non-attainment criteria pollutants. Further, all construction equipment used will meet the emission control requirements provided by the California Air Resources Board's In-Use Off-Road Diesel Vehicle Regulation (CARB 2011). Additionally, any fugitive dust generated from construction that could potentially increase PM_{10} levels will employ dust control measures as outlined in Mitigation Measure AIR-1.

Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment during either construction or operation, and any potential impacts would be less than significant with mitigation.

c. Expose sensitive receptors to substantial pollutant concentrations?

As defined by the California Air Resources Board, sensitive receptors are children, elderly, individuals with asthma and others whose are at a heightened risk of negative health outcomes due to exposure to air pollution. The NCUAQMD has not adopted guidance for health risk assessments or health risk significance thresholds, and instead recommends the use of the California Air Pollution Control Officers Association (CAPCOA) guidance document entitled "Health Risk Assessment for Proposed Land Use Projects" to assist lead agencies with the requirements of CEQA when projects may involve exposure to Toxic Air Contaminants (TACs). The document primarily focuses on addressing long-term public health risk impacts from and to proposed land use projects. The document does not provide guidance on how risk assessments for construction projects should be addressed in CEQA (CAPCOA 2009).

The limited and temporary emissions from construction activity are not significant because the emissions are not long-term and the Project is located in the North Coast Air Basin, which is listed as in "attainment" for all criteria pollutants. Further, all construction equipment used will meet the emission control requirements provided by the California Air Resources Board's In-Use Off-Road Diesel Vehicle Regulation (CARB 2011).

Fugitive dust has the potential to be generated during construction from activities including site preparation, grading, and trenching. Fugitive dust generated from construction activity can result in nuisances and localized health impacts. The NCAUQMD Regulation 1 prohibits nuisance dust generation, such as that generated by construction activity. To reduce potential impacts from fugitive dust generation during construction activity, the construction contractor will employ dust control measures as outlined in Mitigation Measure AIR-1. Therefore, any potential impacts will be reduced to a less than significant level by the application of Mitigation Measure AIR-1.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The Project involves site preparation, grading and installation of landscape features, recreation elements, limited hardscape features, and various cultural interpretative elements. Project construction will be limited in duration and intensity and any emissions from construction vehicles or equipment would be consistent with similar park projects. Further, construction of park elements would be staggered, further reducing concentrated emissions from occurring during construction activities. During

operation, regular maintenance and trash removal would continue to occur, with additional maintenance activity following any special events with increased visitor activity. Emissions that would result in odors are not anticipated from construction activities or during operation of the Project. Therefore, impacts from other emissions would be less than significant.

Mitigation Measures

Mitigation AIR-1
To reduce potential impacts from fugitive dust generation during construction activity, the construction contractor will employ the following dust control measures:

- Apply water to active construction areas to minimize fugitive dust.
- Cover trucks hauling soil, sand, and other loose material.
- Apply water on unpaved access roads and parking areas utilized for Project construction.
- Sweep paved access roads and parking areas and sweep streets if visible material is carried onto adjacent public streets.
- Hydroseed or apply erosion control as appropriate for inactive construction areas.
- Enclose, cover, or water open materials stockpiles.
- Limit traffic speeds to 15 mph on unpaved access roads.
- Install erosion control measures to prevent silt runoff onto public roadways.
- Seed or replant appropriate vegetation in disturbed areas within 30 days after project completion.

4.4. Biological Resources

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or	☐	☒	☐	☐

wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Environmental and Regulatory Setting

The Project is located on the southern edge of Crescent City, bounded by Front Street to the north, Elk Creek to the east, Crescent City Harbor to the south, and B Street to the west. Prior to Euro-American settlement and development of the town of Crescent City, the Project area likely consisted of mudflats, saltmarsh, sand dunes and the Elk Creek estuary. From the 1850s and into the mid-20th century, significant environmental changes occurred in the Project area including development of the harbor and the installation of a seawall along Front Street. In 1964, a large tsunami wave destroyed the Crecent City downtown, harbor and waterfront areas. Beachfront Park was established afterwards and was built with the rubble from the tsunami damage, after it was pushed over the Front Street seawall onto the mudflats. Subsequently, approximately 18 inches of sandy fill material was placed over the debris and the mudflat was converted into uplands. Presently, the Project area consists of open areas covered in mostly nonnative grasses or turf, paved roads and parking areas, several buildings and a line of shore pine (*Pinus contorta*), set back from the seawall along the harbor. Riparian habitat associated with the outlet of Elk Creek is located within the northeastern margins of the Project area. Additionally, there is a limited amount of native vegetation along the southwestern margins of the Project area that contains rare plants.

<u>City of Crescent City Local Coastal Plan</u>
The Crescent City Local Coastal Plan includes Goal 6A (Biological Resources), and Goal 6B (Environmentally Sensitive Habitat Areas) which are pertinent to the environmental analysis of the Project's potential impacts to biological resources. The relevant goals and policies are provided below.

Biological Resources
Goal 6.A. To maintain and where possible enhance marine resources, coastal waters, and sensitive coastal habitats, thereby recognizing the economic and biologic significance of these resources.

General Policies
6.A.1. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health are maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface

water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Environmentally Sensitive Habitat Areas (ESHAs)
Goal 6.B. To protect, restore, and enhance environmentally sensitive habitat areas that support fish and wildlife species throughout the Crescent City Planning Area.

General Policies
6.B.1. Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas and shall be compatible with the continuance of those habitat and recreation areas.

6.B.2. The following are designated as specific environmentally sensitive habitat areas. This list of habitats is not inclusive of all environmentally sensitive habitat areas as defined by Section 30107.5 of the Coastal Act, either as may be currently present within the City, or as might be identified as environmentally sensitive habitat areas at some future time. Any areas not specifically designated in the LCP as environmentally sensitive habitat areas that meet the definition of environmentally sensitive habitat areas in Section 30107.5 of the Coastal Act shall be accorded all the protection provided for environmentally sensitive habitat areas in the LCP.

Coastal Estuary – A coastal water body usually semi-enclosed by land, but which has open, partially obstructed, or intermittent exchange with the ocean and in which ocean water is at least occasionally diluted with freshwater runoff from the land.

Coastal Wetland - Lands within the coastal zone which may be covered periodically or permanently with shallow water such as saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, bogs, and fens. Maintained roadside ditches of five feet or less in width and excavated in historic upland areas that have not been reclaimed or otherwise diked, drained, or altered from a preceding wetland condition, shall not be deemed to be a coastal wetland unless within an area directly subject to tidal influence; existing roadside ditches may be maintained and have improvements made which address safety concerns. Refer to the full definition of wetlands in the glossary for criteria for determining the type and extent of wetlands.

Riparian Vegetation - The plant cover normally found along water courses including rivers, streams, creeks and sloughs, usually characterized by dense growths of trees and shrubs.

Rare or Especially Valuable Plant Habitat – Any plant habitat area that is rare or especially valuable because of their special nature or role in an ecosystem and is easily degraded or disturbed by human activities or developments, including, but not limited to:

- Any habitat area of a plant species designated as rare, threatened, or endangered under State or Federal law;
- Any habitat area of a plant species designated as Fully Protected or Species of Special Concern under State law or regulations; and
- Any habitat area of plant species for which there is compelling evidence of rarity, for example, those designated 1b (Rare or endangered in California and

elsewhere) or 2 (rare, threatened or endangered in California but more common elsewhere) by the California Native Plant Society.

6.B.6. Development in areas adjacent to environmentally sensitive wetland habitat areas shall be sited and designed to prevent impacts which could significantly degrade such areas and shall be compatible with the continuance of such habitat areas. The primary tool to reduce impacts to all types of ESHAs shall be the establishment of a spatial buffer between proposed development and the ESHA. The buffer shall be a minimum of 100 feet in width. A buffer of less than 100 feet may be utilized where it can be determined that there is no adverse impact on the ESHA, based on biological habitat and geophysical assessments taking into account: (a) the extent type, and sensitivity to disturbance of the subject environmentally sensitive area and/or other inter-connected sensitive resource areas; (b) the intensity of the development and its potential direct and cumulative impacts on the adjacent ESHA; and (c) mitigation measures necessary to reduce any significant impacts to less than significant levels, such as the incorporation of vegetative screening, runoff interceptor berming, and other protective features into the reduced buffer. A determination that a reduced buffer meets the criteria and is appropriate will generally only be made in rare instances, and such exceptions to the 100-foot width requirement shall be based upon compelling evidence, including but not limited to: (1) the biological significance of adjacent lands; (2) the sensitivity of affected species to disturbance; (3) the susceptibility of the development site parcel(s) to erosion; (4) whether natural topographic features can be used to locate the development relative to the environmentally sensitive area(s); (5) whether there are existing cultural features to co-terminally locate buffer zones; (6) the lot configuration and location of existing development; and (7) the type and scale of development proposed. A determination to utilize a buffer area of less than 100 feet shall be made in cooperation with the California Department of Fish and Game and the City's determination shall be based upon specific findings as to the adequacy of the proposed buffer to protect the identified resource.

Rare Plant Habitat Policies
6.B.21. As an initial screening tool, the California Natural Diversity Database, "RareFind" utility and other similar tabulated and mapping resources shall be used in the review of development proposals to assess the need for detailed biological assessments at proposed project sites.

6.B 22. Upon a finding that a resource dependent use at a project site containing rare plant ESHA cannot be feasible sited or designed to avoid the plants or their habitat, approval of the development shall be conditioned upon the permittee participating in a rare plant mitigation, management, and monitoring program with the California Department of Fish and Game and/or the U.S. Fish and Wildlife Service, as applicable to the affected species habitat.

<u>CEQA Guidelines</u>
CEQA Section 15380 provides guidance for what should be considered an endangered, rare, or threatened species, including a definition of "species" (subdivision [a]), definitions of "endangered," "rare,", and "threatened" (subdivision [b]), defining state or federally listed species as endangered, rare, or threatened (subdivision [c]), and specifying that: "(d) A species not included in any listing identified in subdivision (c) shall nevertheless be considered to be endangered, rare or threatened, if the species can be shown to meet the criteria in subdivision (b)."

For rare plants, the California Native Plant Society (CNPS) and California Department of Fish and Wildlife (CDFW) maintain lists of taxa that have been evaluated for distribution, abundance, threats, and other

characteristics that contribute to rarity and endangerment. Taxa on the California Rare Plant Rank (CRPR) lists are evaluated by panels of taxon experts and are assigned a CRPR based primarily on number of occurrences, distribution, and level of threat. The CNPS and CDFW maintain that all CRPR 1 (plants rare, threatened, or endangered in California and elsewhere) and CRPR 2 (plants rare, threatened, or endangered in California, but more common elsewhere) taxa meet the definition of endangered, rare, or threatened under CEQA Section 15380 and must be evaluated during CEQA review.

Biological Resources in the Project Area

To develop a list of species to include in the assessment of potential impacts, a query of the California Natural Diversity Database (CNDDB) was conducted for known occurrences within the 9 USGS quadrangles surrounding the Project area, and a species list was provided by the U.S. Fish and Wildlife Service (USFWS) utilizing the Information for Planning and Conservation (IPaC) for the Project area (CNDDB 2024b, USFWS 2023). In addition, existing biological surveys and reports for the Project area, and previously conducted environmental review documents for nearby similar projects were reviewed. Zack Larson and Associates completed a biological assessment for the Crescent City Storm Drain Project, including four surveys in 2018 and a follow up in 2019 (Larson & Assoc. 2019). Subsequently, SHN performed follow-up surveys of Beachfront Park in 2022 and 2023 and mapped rare plants (SHN 2023). The species lists and reports are cited here as reference and included in the Project record. Two rare plants are discussed below as the Project has the potential to impact individuals or their habitat.

The Wolf's evening primrose (*Oenothera wolfii*) is a rare plant that has been documented within the Project area (see Figure 4, SHN 2023). Wolf's evening-primrose is not formally listed under either the federal Endangered Species Act or the California Endangered Species Act, however, under CEQA and the Crescent City Local Coastal Plan, the species is afforded protections as a rare plant (see Public Resource Code [PRC] § 15380) because it has a Rare Plant Rank of 1B.1 (CNDDB 2024a). This ranking is further explained below:

- 1B - Plants Rare, Threatened, or Endangered in California and Elsewhere (includes Rare Plant Ranks 1B.1, 1B.2, 1B.3). The plants of Rank 1B are rare throughout their range with the majority endemic to California. Most of the plants that are ranked 1B have declined significantly over the last century.
- Threat Code Extensions: 1 – Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat).

The beach pea (*Lathyrus japonicas*) is a rare plant that has been documented adjacent to, but not within, the Project area (SHN 2023). The beach pea is not formally listed under either the federal Endangered Species Act or the California Endangered Species Act, however, under CEQA and the Crescent City Local Coastal Plan, the species is afforded protections as a rare plant (see PRC § 15380) because it has a Rare Plant Rank of 2B.1 (CNDDB 2024a). These rankings are further explained below:

- 2B: Plants Rare, Threatened, or Endangered in California, but More Common Elsewhere (includes Rare Plant Ranks 2B.1, 2B.2, 2B.3). The plants of Rank 2B are rare, threatened, or endangered in California, but more common elsewhere. Plants common in other states or countries are not eligible for consideration under the provisions of the Federal Endangered Species Act; however, they are eligible for consideration under the California Endangered Species Act. This rank is meant to highlight the importance of protecting the geographic range

and genetic diversity of more widespread species by protecting those species whose ranges just extend into California.

- Threat Code Extensions: 1 – Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat).

Discussion of Impacts

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries?

The highest concentration of Wolf's evening primrose is located in the southwestern margins of the Project area near the Crescent City Wastewater Treatment Plant and, to a much lesser extent, in the northeastern margins of the Project area near Elk Creek, south of Front Street and just east of the proposed Tolowa Interpretive Plaza (see Figure 4, SHN 2023). The Wolf's evening primrose is typically a biennial with high germination rates and low seedling survival. As a result, during different years, plants may sprout and flower in different locations and quantities within a given area, as has been the case in the Project area. Surveys for Wolf's evening primrose occurred in 2015 during the planning and development stage of the adjacent Wastewater Treatment Plant, and in August 2023.

The Project's ground disturbing activities and construction will take place entirely outside of the rare plant environmentally sensitive habitat area (ESHA) and a 100-foot buffer will be put in place to prevent any trampling or other disturbance, prior to any ground disturbing activities or staging of equipment, as described in Mitigation Measure BIO-1. Additionally, best management practices (BMPs) would be implemented during construction to address stormwater runoff and erosion as described in Mitigation Measure BIO-2, including the development of a Storm Water Pollution Prevention Plan (SWPPP), as required under the Construction General Permit for ground disturbing activities on sites greater than one acre. For construction of Project elements (e.g., the proposed Tolowa Interpretive Plaza and Trail) where it may not be possible to achieve a 100-foot buffer from sensitive habitat and riparian areas (i.e., Wolf's evening primrose and Elk Creek wetlands) due to spatial constraints, implementation of Mitigation Measure BIO-3 would require construction staging to occur further upland in the park and stockpiling of any soils at least 100 feet away, clearly marked work limits (e.g., exclusionary fencing), installation of silt fences as needed, as well as seasonal work windows (i.e., summer and early fall dry season) to minimize the risk of erosion and sediment discharge from rain events. Therefore, with implementation of Mitigation Measures BIO-1, BIO-2 and BIO-3, Project construction and implementation will not substantially adversely affect any species identified as a candidate, sensitive, or special status species, and any potential impacts will be reduced to a less than significant level.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Riparian habitat is present within the Project area along the northeastern margins associated with Elk Creek (see Section 4.4c below). The highest concentration of Wolf's evening primrose, a rare plant (see PRC § 15380), has been documented in the southwest margins of the Project area in a degraded dune

mat sensitive natural community in the vicinity of the Crescent City Wastewater Treatment Plant, and, to a much lesser extent, in the northeastern margins west of Elk Creek (see Figure 4, SHN 2023) .

Project elements in the vicinity of the riparian habitat along the northeastern margins near Elk Creek include the Tolowa Interpretive Plaza just west of Elk Creek, Tolowa Interpretative Trail (which begins at the Interpretive Plaza and run the southern perimeter of the Project site), amphitheater berm southwest of Fred Ender Municipal Pool, and dune features in both the City and CalTrans Right-of-Way just north of Elk Creek. While these elements are immediately adjacent to the riparian area of the inlet of Elk Creek, no in-water work is proposed that would directly disturb any habitat. Further, as described in Mitigation Measure BIO-3, construction staging for these elements would occur further upland in the park and work limits along the riparian area will be clearly marked with exclusionary fencing. Silt fences will be installed as needed to prevent any silt and sediment transport into Elk Creek, and any stockpiled soils will be located away from Elk Creek (by at least 100 feet). Finally, seasonal work windows would be implemented to the extent possible to avoid work during the rainy season, and the City of Crescent City will conduct regular inspections to ensure construction stays within the limits of work.

Limited ground disturbing activities will occur near the southwestern margins containing Wolf's evening primrose. Further, this species will receive a 100-foot protective buffer and fencing to ensure protection, as described in Mitigation Measure BIO-1, and further protections if needed as described in Mitigation Measure BIO-3. Additionally, Project elements in the vicinity of the southwestern margins, primarily paved areas connecting the 1-mile loop trail, would include BMPs for controlling stormwater runoff and erosion control measures such as the use of fiber rolls and silt fences during construction of the loop trail, and stabilizing any exposed soils within the work area resulting from shallow excavation and grading, as described in Mitigation Measure BIO-2.

Therefore, with implementation of Mitigation Measures BIO-1, BIO-2 and BIO-3, project construction and implementation will not impact any riparian habitat or sensitive natural communities, and any potential impacts will be reduced to a less than significant level.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The proposed Project will not involve any hydrological interruption or direct removal of fill within any wetland areas; however, fill will be imported and placed for the construction of the amphitheater berm in the southeastern portion of the Project area, south and southwest of the Fred Endert Municipal Pool. This area of proposed fill is directly adjacent to the riparian area of the inlet of Elk Creek, which is identified by the United States Fish and Wildlife Service, National Wetlands Inventory, as a "Estuarine and Marine Wetland" with the classification code "M2US2N" which classifies the area as "Marine, Intertidal, Unconsolidated Shore, Sand, and Regularly Flooded." The United States Geological Service National Hydrography Dataset identifies Elk Creek as a Lake/Pond waterbody.

To ensure the protection of this designated wetland, all fill activities associated with the amphitheater berm will be landside and no in-water work is proposed. Further, as described in Mitigation Measure BIO-3, limits of work along the riparian area will be clearly marked with exclusionary fencing, and silt fences installed to prevent any silt and sediment transport when the fill is placed. Seasonal work windows will be implemented to the maximum extent practicable to avoid rain-induced erosion and sediment transport. The City of Crescent City will also conduct regular inspections to ensure construction

stays within those limits and does not result in any habitat disturbance. Finally, the amphitheater fill will consist of spoils from the dredging of Crescent City Harbor. This beneficial reuse of dredged spoils will require a conditional waiver of waste discharge requirements under the California North Coast Regional Water Quality Control Board (NCRWQCB) Order No. R1-2017-0039, demonstrating that the fill is low threat and is appropriate for beneficial reuse.

Therefore, by avoiding any in-water work for fill activities, and with the implementation of Mitigation Measures BIO-3 and the NCRWQCB's conditional waiver of waste discharge requirements, project construction and implementation will not impact any state or federally protected wetlands, and any potential impacts will be reduced to a less than significant level.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Elk Creek provides spawning habitat for salmonid species including cutthroat and steelhead trout as well as coho and Chinook salmon. Project elements in the vicinity of Elk Creek include the Tolowa Interpretive Plaza just west of Elk Creek, Tolowa Interpretative Trail (which begins at the Interpretive Plaza and runs the southern perimeter of the Project site), amphitheater berm southwest of Fred Endert Municipal pool, and dune features in City and CalTrans Right-of-Way just north of Elk Creek. While these elements are immediately adjacent to the riparian area of the inlet of Elk Creek, no in-water work is proposed that would directly disturb any salmonid habitat. Further, as described in Mitigation Measure BIO-3, construction staging for these elements would occur further upland in the park and work limits along the riparian area will be clearly marked with flagging. Silt fences will be installed as needed to prevent any silt and sediment transport into Elk Creek, and any stockpiled soils will be located away from Elk Creek (by at least 100 feet). Finally, seasonal work windows will be implemented where possible to avoid construction in the rainy season and the City of Crescent City will conduct regular inspections to ensure construction stays within the limits of work. Therefore, by avoiding any in-water work during construction of riparian-adjacent project elements and with implementation of Mitigation Measure BIO-3, the Project will not interfere with the movements of any native fish, wildlife or affect migratory corridors or nursery sites, and any potential impacts will be reduced to a less than significant level.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Beachfront Park includes planted mature Monterey pine (*Pinus radiata*) and Monterey cypress (*Hesperocyparis macrocarpa*) trees in the northern and eastern zones. A small number of Coast redwoods (*Sequoia sempervirens*) are also interspersed throughout the park along with various deciduous trees. The majority of trees would remain onsite and be protected according to the Project's Tree Protection and Removal Plan (see Appendix C). Such trees would require protective fencing, trunk protection and supplemental watering (as needed); activity within the tree protection zone will also be restricted (e.g., demolition, grading, trenching, etc.).

Approximately 45 trees would be removed throughout the site, mostly consisting of Monterey pine and Monterey cypress, primarily located in the amphitheater area southwest of Fred Endert Municipal Pool. All trees will be removed according to the Tree Protection and Removal plan, and subject to the City's written approval. In particular, the identified Monterey cypress trees will be removed per the

requirements of the City of Crescent City's Code of Ordinance § 12.34.30 Landmark Trees, which designates Monterey cypress trees on publicly owned land as a *Designated Species* due to, "…Height, girth, form and beauty as to be significant and unique in the community." As such, the removal of Monterey Cypress would be subject to notification of the City and would require 2:1 replacement per the City's Code of Ordinance § 12.34.30, as described in Mitigation Measure BIO-4. Therefore, through implementation of the Project's Tree Protection and Removal Plan and Mitigation Measure BIO-4, the Project will not conflict with any local policies or ordinances protecting biological resources, and any potential impacts will be reduced to a less than significant level.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There are no Habitat Conservation Plans or Natural Communities Conservation Plans in the City, nor are there any in adjacent areas affected by the Project. Therefore, the Project does not conflict with any Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan and no impacts would occur.

Mitigation Measures

Mitigation Measure BIO-1:
The Project will follow Local Coastal Plan policy 6.B.6 for the protection of Environmentally Sensitive Habitat Areas (ESHAs). Prior to Project implementation, any ground disturbing activities or staging of equipment, riparian areas will receive a 100-foot protection buffer and be fenced off to prevent disturbance, where feasible. All areas containing Wolf's evening primrose will be protected by a 100-foot buffer and fenced off to prevent trampling or disturbance. For areas within the 100-foot buffer that require construction actions, the qualified biologist will recommend additional protective measures or monitoring in coordination with CDFW.

In addition, to preserve any potential existing Wolf's evening-primrose seedbank in the Project area, the construction contractor will scrape the topsoil from areas of ground disturbance with potential to contain seeds and place the topsoil in areas identified for their suitability as potential habitat (i.e., well-drained, sandy soils). At time of construction, the qualified biologist for the Project, in coordination with CDFW, will determine the areas of topsoil to be relocated and the suitable area for the fill placement.

Mitigation Measure BIO-2
To prevent any sediment from Project construction activities from impacting rare plant and riparian Environmentally Sensitive Habitat Areas (ESHAs), the Project's construction contractor will implement best management practices (BMPs) for controlling stormwater runoff and maintaining water quality, including the development of a Storm Water Pollution Prevention Plan (SWPPP), as required under the under the NPDES permit for Discharges of Storm Water Runoff Associated with Construction Activity (Order No. 2009-009-DWQ) for ground disturbing activities on sites greater than one acre. The SWPPP will meet all requirements set forth in the Crescent City Local Coastal Plan, in addition to all federal and state requirements. This will include erosion control measures to prevent sediment from migrating off-site through installation of sediment controls such as fiber rolls, silt fences or sediment basins, establishing effective perimeter controls and stabilizing construction entrances/exits to control sediment

discharges, and stabilizing exposed soils within the work area immediately after completion of earthmoving activities.

See also Mitigation Measure HAZ-1 and WATER-1 for additional BMPs that would be implemented as part of a SWPPP.

Mitigation Measure BIO-3
To protect Elk Creek wetlands from general ground disturbance, staging areas will be established upland to the extent possible, on paved or graveled areas or ruderal habitat. For work occurring adjacent to Elk Creek wetlands, limits of work will be clearly marked with exclusionary fencing, and silt fences may be installed as needed. Stockpiled soils will be located away from Elk Creek wetlands (by at least 100 feet) and straw wattle (or similar material) will be placed around the stockpile until disposed. Additionally, any activities that increase the potential for erosion shall be restricted to the relatively dryer summer months and early fall period, to the maximum extent practicable, to avoid or minimize sediment transport during rain events to sensitive areas, including Wolf's evening primrose habitat and Elk Creek and surrounding wetlands.

For construction activities that must take place during the late-fall, winter, or spring, particularly those within 100-feet of Wolf's evening primrose habitat or Elk Creek and surrounding wetland areas, temporary erosion and sediment control structures shall be in place and operational at the end of each construction day and maintained until permanent erosion control structures are in place. Exclusionary fencing will be installed around environmentally sensitive areas and other areas that do not need to be disturbed.

Within 10 days of completion of construction, in those areas where subsequent ground disturbance will not occur for 10 calendar days or more, weed-free mulch shall be applied to disturbed areas to reduce the potential for short-term erosion.

Finally, the City of Crescent City will conduct regular inspections to ensure construction stays within the limits of work. In such cases where construction activity may exceed project limits, the City will work in consultation with CDFW and/or USFWS to immediately restore any sensitive habitat outside the limits of work.

Mitigation Measure BIO-4
Where a landmark tree is proposed for removal by the public agency which owns it, replacement shall be provided as follows:

a. When removed because it is found that the landmark tree is a hazard or is dying, one tree of the same species shall be planted in the same vicinity as the removed tree within thirty days of the removal.

b. When removed for the purpose of establishment, expansion or maintenance of a public facility, two trees of the same species shall be planted in the same vicinity as the removed tree within thirty days of completion of construction.

4.5. Cultural Resources

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Environmental and Regulatory Setting

The Project is located within the ethnographic territory of the Tolowa Native American Tribal Group, whose traditional boundaries extended from present-day Sixes River in Curry County, Oregon to the Applegate River valley in Josephine County, Oregon to Wilson Creek in Del Norte County, California. Multiple Tolowa village sites were in the vicinity Crescent City, with the closest village at Battery Point just to the southwest of Beachfront Park (the village of Tatatum). At the time of Euro-American contact, the Tolowa were found residing in eight large coastal villages. Each village claimed a specific section of shoreline and the boundaries of each village tract were well known and defended if necessary. The Tolowa resided in the coastal villages year-round, moving inland to gather seasonally available resources.

Beginning in the early 1850s, Euro-American settlers populated the area during the initial wave of the California Gold Rush. The harbor served as a launch point and supply depot for mining camps located further inland. Subsequently, the harbor and adjoining lands were developed to transport timber and support the commercial fishing industry. Areas farther away from the harbor, in the surrounding valleys, supported agriculture, including a large dairy industry.

In 1964, a large tsunami wave destroyed the Crecent City downtown, harbor and waterfront areas. Beachfront Park was established afterwards and was built with the rubble from the tsunami damage, after it was pushed over the Front Street seawall onto the mudflats. Subsequently, approximately 18 inches of sandy fill material was placed over the debris and the mudflat was converted into uplands.

Previous cultural resource investigations have revealed a long history of intensive use of the Crescent City area, both in the pre-contact and historical periods. The most recent cultural resource investigation was conducted by Roscoe & Associates in 2018 for the Crescent City storm drain project (Roscoe & Assoc. 2018). The investigation covered an area along Front Street that overlaps with and includes Beachfront Park, and the report includes an extensive record of prior investigations, interviews and historical research. Based on the conclusions in Roscoe & Assoc. (2018), it may be concluded that no historic properties or historical resources have been identified within the Project area.

Federal, State and Local Laws and Policies

The Project is partially funded by the State of California and requires review and approval from California state agencies. As such, the Project must comply with state and local laws and regulations for the protection of historical and cultural resources. Currently, there is no component of federal funding or any required federal agency approval for the Project. Therefore, Section 106 of the National Historic Preservation Act (NHPA) does not apply. If some component of the funding or project design changes that would involve a federal nexus, then the Project must comply with Section 106 of the NHPA.

The Crescent City Local Coast Plan includes Goal 5.G (Cultural Resources) which states:

> To encourage identification, protection, and enhancement of Crescent City's important historical, archaeological, paleontological, and cultural sites and activities, and their contributing environment.

LCP Goal 5G is implemented through the following policies:

> Policy 5.G.1. Appropriate surveys and site investigations shall be required as part of the application review of development projects when it has been determined that the development site or design has the potential to adversely impact archeological or paleontological resources, and/or as may be required in accordance with the California Environmental Quality Act (CEQA). Surveys and investigations shall be performed under the supervision of a professional archaeologist or other person qualified in the appropriate field approved by the City.
>
> Policy 5.G.2. Discretionary development projects shall be required to be designed to mitigate potential impacts to significant paleontological or cultural resources whenever possible. Determinations of impacts, significance, and mitigation shall be made by qualified archaeological (in consultation with recognized local Native American groups), historical, or paleontological consultants, depending on the type of resource in question.
>
> Policy 5.G.3. Where it is determined development would adversely affect archaeological or paleontological resources as identified by the State Historical Preservation Officer, reasonable mitigation measures shall be required.

Under CEQA, a project may have a significant effect on the environment if the project may cause a substantial adverse change in the significance of a historical, tribal cultural, or unique archaeological resource (PRC 21084.1, CA AB52 Chapter 532 [2014], and PRC Section 21083.2). Actions that would cause a substantial adverse change to the significance of a historical, tribal cultural, or unique archaeological resource include but are not limited to demolition, replacement, substantial alteration, and relocation.

CEQA - Definitions
The term "historical resource" is legally defined in California Code of Regulations (CCR), Title 14, Chapter 3, Section 15064.5 (a). Under 14 CCR 15064.5(a)(3), an historical resource is defined as:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (CRHR) (PRC Section 5024.1).

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the PRC or identified as significant in an historical resource survey meeting the requirements in section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (PRC Section 5024.1) including the following:

A. is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

B. is associated with the lives of persons important in our past;

C. embodies the distinctive characteristics of a type, period, region, or method of construction, represents the work of an important creative individual, or possesses high artistic values; or

D. has yielded, or may be likely to yield, information important in prehistory or history.

The CRHR also includes resources listed in or formally determined eligible for the listing in the National Register of Historic Places, as well as California State Landmarks and Points of Historical Interest. Resources of local significance that are listed under a local preservation ordinance or are otherwise considered historically significant at a local level, may also be considered eligible for the CRHR. The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to section 5020.1(k) of the PRC), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the PRC) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC sections 5020.1(j) or 5024.1.

The term "tribal cultural resource" is legally defined in PRC Section 21074:

(a) "Tribal cultural resources" are either of the following:

(1) Sites, features, places, cultural landscape areas, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the CRHR.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of

> PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
>
> (b) A cultural landscape area that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape area is geographically defined in terms of the size and scope of the landscape area.
>
> (c) A historical resource described in PRC Section 21084.1, a unique archaeological resource as defined in subdivision (g) of PRC Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of PRC Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

The term "unique archaeological resource" is an archaeological artifact, object, or site that meets any of the criteria presented in PRC Section 21083.2(g):

> (g) As used in this section, "unique archaeological resource" means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
>
> > (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
> >
> > (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
> >
> > (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

California Assembly Bill (AB) 52 requires that lead agencies consider the effects of projects on tribal cultural resources and that consultation with federally and non-federally recognized Native American Tribes take place early in the environmental review process. As defined in PRC §21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are listed, or determined to be eligible for listing, on the national, state, or local register of historical resources.

Discussion of Impacts

a, b) Cause a substantial adverse change in the significance of a historical and/or archaeological resource pursuant to in §15064.5?

A Northwest Information Center (NWIC) records search concluded that no archaeological resources have been recorded on the Project site (NWIC 2024). The records search determined that one informal resource, a memorial to the S.S. Emilio, exists on the Project site. This memorial will not be disturbed or moved, and appropriate protective fencing buffers will be installed. The records search determined there is a high potential for Native American archaeological resources and a high potential for historic-period archaeological resources to be within the Project area. However, due to the area being developed with rubble from the 1964 tsunami and covered with 18 inches of sandy fill, the original mudflat soils are covered with up to ten feet of fill. Mudflat soils will not be disturbed as part of the Project.

As required by Assembly Bill (AB) 52, the City of Crescent City sent letters to Native American Tribes with interests in Del Norte County in February 2024 (see Appendix E). No Tribe requested formal consultation under AB 52[4]. The Tolowa Dee-ni' Nation requested access for monitoring by Tribal staff during any excavation activities, and this will be incorporated into the Project implementation as Mitigation CULT-1.

The cultural resource investigation conducted by Roscoe & Associates in 2018 for the Crescent City Storm Drain Project analyzed Beachfront Park as part of the Area of Potential Effect. The investigation did not identify any historical or archaeological resources where ground disturbance would occur on the Project site. Furthermore, because Beachfront Park is located on fill and rubble covering a mudflat, and the needed excavation for the Project would be minimal, it is unlikely that any unknown historical or archaeological resource would be inadvertently discovered. If any historical or archaeological resource is inadvertently discovered during construction of the Project, adherence to Mitigation Measures CULT-1 and CULT-2 will reduce impacts to a less than significant level.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

No human remains have been documented within the Project area. As stated above, the Beachfront Park area has been significantly altered since the 1964 tsunami event, and the entire Project area is covered with several feet of fill material. Because the Project will not involve extensive or deep excavation of soils, it is likely that only fill material will be disturbed, and it is unlikely to contain any human remains. However, there is always the potential of unanticipated discoveries of human remains. If any human remains are inadvertently discovered during construction of the Project, adherence to Mitigation Measures CULT-1 and CULT-2 will reduce impacts to a less than significant level.

Mitigation Measures

Mitigation Measure CULT-1
At least 72 hours in advance of any ground disturbing activities or excavation, the City shall contact the THPO for the Tolowa Dee-ni' Nation to facilitate access for Tribal staff monitoring of such ground disturbing activities or excavation at the Project site.

Mitigation Measure CULT-2
Ground disturbing construction activities to implement the Project have the potential to inadvertently uncover subsurface archaeological material or human remains. If materials or remains are unearthed during Project construction, the following mitigation measures would reduce the impact on cultural resources to a less-than-significant level by assuring proper protocols are in place for inadvertent discovery of potential cultural resources disturbed during construction.

Inadvertent Discovery of Archaeological Material
If cultural materials (for example: chipped or ground stone, historic debris, building foundations, or bone) are discovered during ground-disturbance activities, work shall be stopped within 20

[4] On March 12, 2024, the Yurok Tribe accepted the invitation for consultation; however, the Tribe later decided not to pursue consultation.

meters (66 feet) of the discovery, per the requirements of CEQA (Title 14 CCR 15064.5 (f)). Crescent City representatives shall be immediately notified and work near the archaeological finds shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the materials and offered recommendations for further action.

Inadvertent Discovery of Human Remains
If human remains are discovered during project construction, work will stop at the discovery location, within 20 meters (66 feet), and any nearby area reasonably suspected to overlie adjacent to human remains (PRC, Section 7050.5). The Del Norte County Coroner shall be immediately notified. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (PRC, Section 5097). 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, of the human remains and any associated grave items, as provided in PRC, Section 5097.98.

4.6. Energy

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Environmental and Regulatory Setting

All primary energy used in Del Norte County is imported, except for a small amount of grid-tied solar energy. All transportation fuels are imported. Electricity is provided by Pacific Power through a single transmission line originating in Oregon that is connected to the larger regional grid. Del Norte County is remotely located at the end of the electrical supply grids, and this limits both energy supply options and system reliability. Beachfront Park is connected to the existing electrical infrastructure that serves the City of Crescent City. Beachfront Park is also served with individual propane tanks

In 2003, the California Energy Commission (CEC), California Power Authority (CPA), and the California Public Utilities Commission (CPUC) jointly adopted an Energy Action Plan (EAP) that listed goals for California's energy future and set forth a commitment to achieve these goals through specific actions. In 2005, the CPUC and the CEC jointly revised the EAP to identify the further actions necessary to meet

California's future energy needs. To the extent that efficiency, demand response, renewable resources, and distributed generation are unable to satisfy increasing energy and capacity needs, the EAP supports the use of clean and efficient fossil-fired generation. The plan recognizes that concurrent improvements are required to the bulk electricity transmission grid and distribution facility infrastructure to support growing demand centers and the interconnection of new generation, both on the utility and customer side of the meter.

Title 24, which was promulgated by the CEC in 1977 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption, provides energy efficiency standards for residential and nonresidential buildings. These standards conserve electricity and natural gas and prevent the state from having to build more power plants. The success of these standards and other energy efficient efforts is a significant factor in California's per capita electricity use remaining flat over the last 40 years while the rest of the country's use continues to rise. The energy efficient standards have saved Californians billions in reduced electricity bills since 1977.

The Crescent City Local Coastal Plan contains the following policy to use low-energy lighting for public facilities and new development:

> 5.E.7. All public facilities and new development shall be required, whenever feasible, to use low-energy shielded lights with a downward directed cast for better efficiency and to minimize nighttime glare.

Discussion of Impacts:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

During construction of the Project, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and on-site equipment, construction worker travel and delivery truck trips to and from the site, and potentially to operate temporary generators to provide power for lighting and electronic equipment, if grid power is not available.

There are no unusual characteristics of the Project that would require construction equipment or practices that would be less energy efficient than at comparable construction sites in the region or state. Construction activities would be short in duration (approximately 13 months) and related fuel consumption would cease once construction ends. Due to the temporary nature of construction activities, the fuel and energy needed during construction would not be considered a wasteful or inefficient use of energy. Therefore, it is expected that construction energy consumption associated with the Project would be comparable to other similar construction projects and would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction.

Energy use during long-term operation of the Project will not be significantly different from the existing energy usage at Beachfront Park. It is possible that operational energy consumption of Beachfront Park may increase as a result of the improvements including bollard, entryway, and restroom lighting, as well as any digital components for the interpretive nodes. Energy usage for these improvements is expected to be minimal and potentially offset by low wattage lighting and energy efficiency upgrades. Power would also be utilized for food trucks (via docking stations) and for concerts held at the amphitheater. While energy use is expected to increase during concerts or larger gatherings, such events would only

occur approximately 10-15 times a year and, as such, any increases in energy use will be temporary and intermittent. Therefore, it is expected that operational energy consumption associated with the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during operation, and any impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

This type of project at its proposed location, as defined within this document would not, by definition, obstruct state or local plans for renewable energy or energy efficiency and no impact would occur.

4.7. Geology and Soils

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☒
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Environmental and Regulatory Setting

Prior to the development of the existing Beachfront Park, the Project area was a tidally influenced mud flat which extended approximately 800 feet southeast from Front Street and was associated with the Elk Creek estuary. Following the 1964 tsunami, the U.S. Army Corps of Engineers (USACE) dredged the Crecent City harbor and placed various debris, rubble and approximately 18 inches of sandy fill in the Project area. Following the placement of fill, a rock revetment was developed along the shoreline between the Pacific Ocean, Elk Creek, and the existing park area.

Geology: As described by the California Department of Conservation (CDC), and California Geological Survey (CGS), the site is composed of marine and continental sedimentary rocks from the Pleistocene-Holocene era. These sedimentary rocks are composed of unconsolidated and semi- consolidated alluvium, lake, playa and terrace deposits.

The Project is located between several faults, as identified by the United States Geological Survey (USGS), and California State Lands Commission (CSLC). Three faults are located west of the Project, within the Pacific Ocean, and one is located east at the California Coastal Range of mountains.

Offshore Faults: An unnamed quaternary thrust fault is located approximately 3 miles west of the Project. The Lost Man Fault quaternary thrust fault is approximately 7 miles west of the Project. And the Bald Mountain – Big Lagoon late quaternary thrust fault is located approximately 12.75 miles west of the Project. Farther west, there are the Cascadian Fold and Fault belt, the Cascadia Megathrust Fault, and the Blanco Transform Fault Zone. These three areas are part of the Cascadia Subduction Zone (CSZ), which a subduction zone that stretches from Vancouver Island of Canada to Cape Mendocino of California. The CSZ is known to result in earthquakes up to a magnitude of 9.0 and occurring approximately every 400-600 years. The last known CSZ event occurred in 1700 CE, indicating another megathrust earthquake may occur within the next 100-300 years.

In-Land Fault: The South Fork pre-quaternary thrust fault is located approximately 6.5 miles east of the Project.

Soils: Utilizing the NRCS Web Soil Survey, five soil groups were identified within the Project area which are described below.

Unit Name	Acres in Area of Interest	Percentage of Area of Interest
131 - Typic Fluvaquents, 0 to 2 percent slopes	1.2	2.9%
145 - Halfbluff-Tepona-Urban Land, 0 to 2 percent slopes	29.8	70.7%
146 - Halfbluff-Tepona-Urban Land, 2 to 9 percent slopes	1.6	3.8%
155 - Samoa-Clambeach complex, 0 to 50 percent slopes	9.4	22.4%

191 - Talawa, 0 to 2 percent slopes	0.1	0.3%

131 – Typic Fluvaquents (0 to 2 percent slopes), is poorly drained, and is typically approximately 34-60 inches deep. This layer is generally composed of sandy loam, fine sandy loam, and silt loam.

145 - Halfbluff-Tepona-Urban Land (0 to 2 percent slopes), the Halfbluff portion is moderately well drained, and is typically 55 to 60 inches deep and is generally composed of fine sandy loam, and sandy loam. The Tepoma portion of this layer is typically 49 to 60 inches deep, moderately well drained, and is generally composed of slightly decomposed plant material, loam, very fine sandy loam, and sandy loam.

146 - Halfbluff-Tepona-Urban Land (2 to 9 percent slopes), the Halfbluff portion is moderately well drained, and is typically 37 to 71 inches deep and is generally composed of loam, fine sandy loam, and fine sand. The Tepoma portion of this layer is typically 41 to 64 inches deep, moderately well drained, and is generally composed of slightly decomposed plant material, sandy loam, fine sandy loam, and loamy fine sand.

155 - Samoa-Clambeach complex (0 to 50 percent slopes), the Samoa portion is somewhat excessively well drained, and is typically 18 to 63 inches deep, composing of slightly decomposed plant material, and sand. The Clambeach portion is very poorly drained, generally 20 to 63 inches deep, and composes of sand.

191 – Talawa (0 to 2 percent slopes), is very poorly drained, generally 39-60 inches deep, and composes of very fine sandy loam and sandy loam.

Discussion of Impacts:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

As documented by the CGS California Earthquake Hazards Zone Application (last updated September 23, 2021), Project construction and development is not within an earthquake fault zone and has not been evaluated by the CGS for liquefaction or landslide hazards. The California Earthquake Authority (CEA) states that the North Coast region, in which the proposed Project is located, is at risk from the Cascadia Subduction Zone, which is located approximately 70 miles from the Project and can potentially result in magnitude 9 earthquake every 500 years. The CEA further states that there is a 76 percent probability of one or more magnitude 7.0 earthquakes striking Northern California, based on a 30-year period, beginning in 2014.

The Project will not cause rupture of a known earthquake fault, will not cause seismic ground shaking, will not cause seismic-related ground failure, including liquefaction, and will not cause any landslides or increase landslide potential because it is located on a flat surface and not within close proximity to any significant slopes capable of generating landslides. Therefore, no impact would occur.

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

The Project would have no impact with regard to the rupture of a known earthquake fault, as delineated

on the most recent Alquist-Priolo Earthquake fault Zoning Map. The closest known fault is located approximately 2 miles southwest of the Project offshore from Crescent City and it is categorized as quaternary thrust fault by CGS. Project activities, which include shallow excavation and grading, would not rupture any known fault. Therefore, no impact would occur.

ii. Strong seismic ground shaking?

The Project is situated within a seismically active area close to several seismic sources capable of generating moderate to strong ground motions. Given the proximity to active faults within and offshore of northern California, the Project site could experience strong ground shaking. The Project site is not located within an Alquist-Priolo earthquake fault zone, in which the State of California requires special studies for structures for human occupancy. Due to the distance from the Project site to the nearest recognized active fault, and based on the information available, the potential for ground surface fault rupture to occur at the Project site is considered low. Project implementation would not increase the risk of strong seismic ground shaking or exposure to strong seismic ground shaking above existing conditions. Therefore, impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Liquefaction is a phenomenon involving loss of soil strength and resulting in fluid mobility through the soil. Liquefaction typically occurs when loose, uniformly sized, saturated sands or silts are subjected to repeated shaking in areas where the groundwater is less than 50 feet below ground surface. Lateral movement occurs when earthquake shaking causes a mass of soil to lose cohesion and move relative to the surrounding soil. Lateral movement can be entirely horizontal and occur on flat ground, but it is more likely to occur on or around sloping ground, such as adjacent to hillsides and waterways. While the potential for liquefaction-related settlement and lateral spreading exists at the Project site, ground acceleration must be high enough, and the duration of the shaking must be sufficient for liquefaction to occur. Due to the distance from the Project site to the nearest recognized active fault, and based on the information available, the potential for seismic related ground failure and excessive ground acceleration to occur at the Project site is considered low. Project implementation would not increase the risk of ground failure, including liquefaction, above existing conditions. Therefore, impacts would be less than significant.

iv. Landslides?

The Project is located on a relatively flat site that is currently being used as a public park. While the Project includes upgrades to the park, and will import fill for some design features, no steep unstable slopes will be impacted or created. Because steep slopes and hillslopes are not present within the vicinity and the Project proposes similar park uses as currently exists, landslides within or near the Project are unlikely to occur and the potential for landslide occurrence is not exacerbated by the Project. Therefore, no impact would occur.

b) Result in substantial soil erosion or the loss of topsoil?

Loss of topsoil and soil erosion are not expected due to construction or the regular operations and maintenance of the Project. Further, an erosion and sediment control plan would be required during construction. The Project site is flat and stabilized with vegetation, gravel and paved surfaces. A rock revetment along the southern boundary of the Project area protects the site from coastal erosion. Two jetties extend into the Pacific Ocean, southwest and southeast of the Project, which dissipate wave energy, reducing the probability for coastal erosion. The jetty southwest of the Project is divided into a publicly accessible pier, and a longer breakwater constructed of riprap and concrete tetrapods of varying

sizes. The jetty to the southeast, which extends to Whaler Island from the Crescent City Harbor, was previously utilized by the US Coast Guard, and is constructed from riprap. Therefore, given that the site is stabilized with vegetation, gravel and paved surfaces, has natural erosion protection barriers, and with the implementation of an erosion and sediment control plan, and impacts would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

The Project area was significantly altered and developed following the 1964 tsunami. Since the original development of Beachfront Park, there has been no evidence of unstable soils, landslides, liquefaction, lateral spreading or subsidence. The Project construction activities are minimal and planned operations will not change significantly from the existing operations and maintenance activities. Proposed construction activities are expected to result in minor ground disturbance and erosion and sediment control measures will be in place during construction. Therefore, any impacts would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

The area of the proposed Project was created by covering the tidally influenced mud flat with debris from the 1964 tsunami impacts. Building rubble was first placed in the area, then approximately 18 inches of sandy fill was placed over the rubble, and finally, other large masses of concrete were placed on the shoreline to provide armoring along the beach and the Elk Creek Estuary. An NRCS Web Soil Survey determined the rate of linear extensibility of soils within the Project area to be below five percent throughout the site. A top depth of 18 inches, and a bottom depth of 120 inches was utilized in the web soil survey, to reflect that there is approximately 18 inches of soil placed upon approximately 10 feet of concrete rubble and debris. Because the NRCS Web Soil Survey determined the rates of linear extensibility to be minor, and that no large buildings or structures will be developed, any impacts from expansive soils to the Project would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The Project area is directly adjacent to the Crescent City Wastewater Treatment Plant, and all restrooms and plumbing facilities are connected to the treatment plant through the City's sewer system. No septic tanks or alternative wastewater disposal systems are present. The Project will involve the demolition of the existing restroom and construction of a new restroom facility, which will connect to the wastewater treatment plan. Project construction activities will not impact the current restroom from adequately disposing wastewater while in use, or other connected utility services. Therefore, no impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Project area was developed following the 1964 tsunami. Prior to, during, and since the development of the site, there have been no notable historical, archaeological, or paleontological resource discoveries within the Project area. No paleontological resources or unique geologic features are known to exist at the Project site. Regional uplifting and other seismic activity in the area limit the potential for the existence of paleontological resources. Therefore, the Project would result in no impact to

paleontological resources or unique geologic features. As a note, an Inadvertent Discovery Plan will be implemented during the construction phase of the Project to avoid impacts to possible historic, cultural, archeological, and paleontological resources that have not been recorded by previous surveys. (See Mitigation Measures CULT-1 and CULT-2 in Section 4.5, *Cultural Resources*.

4.8. Greenhouse Gas Emissions

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Environmental and Regulatory Setting

Greenhouse gases (GHGs) are gases in the atmosphere that absorb and emit radiation. The greenhouse effect traps heat in the troposphere through a three-fold process, summarized as follows: short wave radiation emitted by the sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of longwave (thermal) radiation, and GHGs in the upper atmosphere absorb and emit this longwave radiation into space and toward the Earth. This “trapping” of the longwave radiation emitted back toward the Earth is the underlying process of the greenhouse effect. Other than water vapor, the primary GHGs contributing to global climate change include the following gases:

- Carbon dioxide (CO2)
- Nitrous oxide (N2O)
- Methane (CH4)
- Chlorofluorocarbons (CFCs)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF6)

Global climate change is not confined to a particular project area and is generally accepted as the consequence of GHG emissions from global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough GHG emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

The leading guidance on GHG emissions within the State of California is the Global Warming Solutions Act of 2006 (Assembly Bill 32), which committed the State of California to reduce GHG emissions. The statute requires the California Air Resources Board (CARB) to track emissions through mandatory reporting, determine the 1990 emission levels, set annual emissions limits, and design and implement regulations and other feasible and cost-effective measures to reduce statewide GHG emissions.

Section 15064.4 of the CEQA Guidelines states that a lead agency has the discretion to determine whether to use a model or methodology to quantify GHG emissions or to rely on a qualitative or performance-based standard. The GHG analysis should consider: 1) the extent to which the project may

increase or reduce GHG emissions as compared to the existing environmental setting; 2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and 3) the extent to which the project complies with any regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. A lead agency is not responsible for wholly eliminating all GHG emissions from a project; the CEQA standard is to mitigate to a level that is "less-than-significant" or, in the case of cumulative impacts, less than cumulatively considerable.

The project site is located in the North Coast Air Basin and is under the jurisdiction of the North Coast Unified Air Quality Management District (NCUAQMD). The NCUAQMD does not have rules, regulations, or thresholds for analyzing the impacts of GHG emissions from land use or infrastructure projects.

Discussion of Impacts:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction of the project may generate GHG emissions as a result of combustion of fossil fuels used in construction equipment. Use of variety of construction materials would contribute indirectly to GHG emissions because of the emissions associated with their manufacture. The construction-related GHG emissions would be minor and short-term and would not constitute a significant impact based on established thresholds. Operations at Beachfront Park after construction are not expected to significantly change existing GHG related emissions from public use of the park. Therefore, the impacts related to the release of GHG emission would be less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Project will not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, no impact would occur.

4.9. Hazards and Hazardous Materials

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Environmental and Regulatory Setting

The Project site is located on the southern edge of Crescent City, bounded by Front Street to the north, Elk Creek to the east, Crescent City Harbor to the south, and B Street to the west. Approximately ¼ mile southwest of Highway 101, the Project site is located within the California Coastal Zone. Uses immediately surrounding the Project area include a brewery/restaurant, residential apartments, and a fuel and home heating oil delivery company, and various commercial businesses to the north; the Lighthouse Cove Recreational Vehicle Park to the east; and the Crescent City Wastewater Treatment Plant to the west. Three sensitive receptors are located in close proximity to the Project, including the Uncharted Shores Academy charter school, located approximately 750 feet north of the site, and Joe Hamilton Elementary School and Crescent Elk Middle School which are located approximately 2,750 feet northwest of the Project.

No potential or confirmed state or federal Superfund site is located within or immediately adjacent to the Project site, no other potentially hazardous facilities have been identified within the Project site. According to the California Department of Toxic Substances Control's EnviroStor database (DTSC 2024) and State Water Resources Control Board (SWRCB) Geotracker database (SWRCB 2024), Agency-listed sites are present within a 1-mile radius of the Project site that have been affected by unauthorized material releases, including three former leaking underground storage tanks (LUSTs) and two SWRCB Cleanup Program sites, located between 200-500 feet of the Project site.

Natural hazards known to occur in the area primarily include tsunamis. Since 1933, at least 32 tsunamis have been observed in the Crescent City area, five of which have caused significant damage to infrastructure, vehicles and the built environment. After the 1964 tsunami that destroyed much of the Crescent City downtown and waterfront, Beachfront Park was created using the rubble and debris from the tsunami, which was covered with dredge spoils and sand. The most recent tsunami to have caused damage in Crescent City is the 2011 Tōhoku tsunami which destroyed all boating docks and sank at least 16 boats in the harbor. Tsunami evacuation signage currently exists within and around the Project area, as well as throughout Crescent City. Maps are available in both physical and digital format, from Crescent City as well as Del Norte County. The City of Crescent city also engages in public outreach

regarding tsunami hazards, including providing fact sheets in hotels/motels, signage along the beaches, mailers to residents, and education in schools.

As described above, the Project area was developed following the 1964 tsunamic impacts. This tsunami heavily impacted approximately 30 city blocks, and the resulting rubble was placed on the 800-foot stretch of native mud flats, along with approximately 18 inches of fill, to create the existing park topography.

Section 7 – Health and Safety, of the Crescent City General Plan contains the following policies regarding hazards and human health and safety:

> Policy 7.A.1 states: "The City shall evaluate proposed projects and land use policy decisions based on the environmental hazards identified in this element. Low intensity/occupancy uses (such as open space, agricultural production, or extremely low-density residential land use) shall be preferred in hazard areas."
>
> Policy 7.C.6, states: "The City, in conjunction with other governmental agencies, when feasible, should utilize lands subject to severe geologic hazards for low intensity park and recreational activities or open space."

Discussion of Impacts:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Project construction would require the use of heavy equipment, vehicles, and tools that use diesel fuel, gasoline, oil, and hydraulic fluid. Hazardous materials used during construction would be transported, used, and stored in accordance with state and federal regulations regarding hazardous materials and disposal of any materials. Such materials could include diesel fuel, lubricating grease and gasoline, which would be stored in designated locations away from sensitive areas including play areas, Elk Creek and surrounding wetlands, and drainage areas. Additionally, all materials designated for disposal would be evaluated for appropriate hazardous waste criteria. Release of potentially hazardous materials that could occur during the construction phase, either onsite or during routine transport of equipment, would be avoided through the implementation of basic equipment maintenance and fueling procedures (Mitigation Measure HAZ-1), spill prevention and control measures, and measures for handling, disposing or disposing of hazardous materials during construction (Mitigation Measure HAZ-2).

During park operation, any hazardous materials would be stored offsite at designated municipal facilities. The use of any potentially hazardous materials onsite would be limited to those needed for park operations and maintenance activities, including disinfectants and cleaners for restroom maintenance, regular park clean-up, and for incidental clean-up from special events due to increased visitor use. The use of any hazardous materials, albeit minor, would be done in accordance with applicable laws and regulations. Additionally, herbicides or pesticides may also be used on a limited basis in discrete areas of the park for pest management and vegetation establishment and would be marked by signage. With the implementation of Mitigation Measure HAZ-3, the public would be notified in advance and any areas designated for herbicide use would be clearly marked.

Therefore, with implementation of Mitigation Measures HAZ-1, HAZ-2 and HAZ-3, the potential impacts to the public or environment through the use, routine transport and disposal of hazardous materials would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

As discussed in 4.9a, project construction would require the use of heavy equipment, vehicles, and tools that use diesel fuel, gasoline, oil, and hydraulic fluid. Any spills of fuel or other potentially hazardous materials could result in significant hazard to the public or environment without proper handling. However, the use of hazardous materials would be done in compliance with federal, state and local regulations and release of such materials would be avoided through the implementation of basic equipment maintenance and fueling measures (Mitigation Measure HAZ-1), spill prevention and control measures, and measures for handling, disposing or disposing of hazardous materials during construction (Mitigation Measure HAZ-2).

During park operation, the minor use of hazardous materials described 4.9a would be done in accordance with applicable laws and regulations.

Therefore, through compliance with the federal, state and local regulations and with implementation of Mitigation Measures HAZ-1 and HAZ-2, potential impacts to the public or environment through accidental release of hazardous materials would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The Project is located approximately 750 feet south of the Crescent City charter school Uncharted Shores Academy, located at 330 E Street. Joe Hamilton Elementary School and Crescent Elk Middle School which are located approximately 2,750 feet northwest of the Project. However, as noted above, limited hazardous materials would be used during operation of the project for cleaning, maintenance and landscape activities, and there would be no hazardous emissions or acutely hazardous material handling. Therefore, any impacts would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The Project site itself does not contain hazardous sites or facilities according to California Department of Toxic Substances Control's EnviroStor database (DTSC 2024) and State Water Resources Control Board (SWRCB) Geotracker database (SWRCB 2024). However, the following sites are located within the vicinity of the Project site: a Leaking Under Ground Storage Tank (LUST) site exists at the Crescent City Wastewater Treatment Plant on B Street, approximately 300 feet west; two SWRCB Cleanup Program Sites, one located at 110-140-180 105 D Street, and the other at 347 2nd Street, approximately 200 feet north; and two additional LUST sites, one located at 245 H Street, and the other at 225 I Street, approximately 500 feet north of the Project site. However, according to the State Geotracker database, all of these sites have been closed and no further action is required. Thus, neither the Project site nor

any of the former hazardous sites in the vicinity of the project would result in significant hazard to the public or environment, and any impacts would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The closest airport is the Del Norte County Regional Airport, approximately 2.75 miles northwest of the Project site. The Project is not within an airport land use plan or within two miles of an airport. The Project, according to the Del Norte County Regional Airport Jack McNamara Field Airport Layout Plan Update (WHPacific, 2019), is outside (south and west of) of areas designated as part of the Airport Land Use Compatibility Plan and not affected by the airport land use plan. Beachfront Park is located in the 361-foot airspace contour with no mapped obstructions. Thus, implementation of the Proposed Project would have no impact from excessive airport noise on people residing or working in the Project area.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Del Norte County Office of Emergency Services (OES) promotes community preparedness through training and education and prepares the County's Operational Area Hazard Mitigation Plan. The Operational Area includes the entire County and the Project area. The County's OES also provides emergency responses services, including in the Project area. None of the Project's elements would interfere with the County's ability to provide emergency response services. Road closures are not anticipated during construction and standard traffic control measures (e.g., flagging, signage, barricades and cones) would be used as needed to ensure access to Front Street at all times during construction. The City of Crescent City also maintains a tsunami evacuation map (Humboldt Earthquake Education Center, 2010) with tsunami safety information and evacuation routes. The Project would not impact evacuation routes, nor the ability to evacuate in the event of a tsunami, as neither barriers nor alterations to Front Street or adjoining streets north of the Project area would occur. Therefore, implementation of the Proposed Project would not interfere with an adopted emergency response plan or emergency evacuation plan, and any impacts would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. The Project area is located adjacent to the Pacific Ocean and embedded within the urban area of the downtown and harbor districts of Crescent City. The closest forested environments are approximately 2.5 miles to the east and are primarily old-growth redwood forest within Redwood State and National Parks, which are not particularly fire prone due to the cool, foggy summers. The Project is not in mapped areas with a high risk of wildland fire hazards. The Project site is located in a less than Moderate Fire Severity Zone. Surrounding areas on the outskirts of the City are located within a Local Responsible Area (LRA) Moderate Fire Severity Zone. The closest High or Very High Severity Zone (located in a State Responsible Area) is approximately 7 miles to the east. (CalFire 2025).

As such, a less than significant impact would occur related to wildfires See also Section 4.20 Wildfire for further discussion. Therefore, the Project would not expose people or structures to wildland fires and any impacts would be less than significant.

Mitigation Measures

Mitigation Measures HAZ-1:
Proper equipment maintenance and fueling procedures will be implemented to ensure that no fluids are discharged into streams, water bodies, wetlands or drainage facilities, and that any spills are promptly cleaned up, documented, and reported (if necessary). A separate area will be designated for equipment maintenance and fueling, at least 150 feet or more from any stream, water body, or wetland, as feasible. Cleanup materials and tools will be kept nearby and available for immediate use and equipment will not be stored in areas that will potentially drain to watercourses. If this is not feasible, drip pans, berms, sandbags, or absorbent booms shall be employed to contain any leaks or spills. No vehicle or equipment cleaning will be done on-site.

Mitigation Measures HAZ-2:
The construction Contractor will develop a Spill Prevention and Response Plan. Equipment and materials for cleanup will be available on site, and spills and leaks will be cleaned up immediately and disposed of according to guidelines stated in the Spill Prevention and Response Plan. Spill response kits will always be in close proximity when using hazardous materials (e.g., at crew trucks and other logical locations). Absorbent materials will be maintained at the Project site in sufficient quantity to effectively immobilize the volume of petroleum-based fluids contained in the largest tank present at the site. For spills on impervious surfaces, absorbent materials will be used to remove the spill. For spills on pervious surfaces such as soil, the spill will be excavated and properly disposed of rather than buried. Absorbent materials will be collected and disposed of properly and promptly. Petroleum products and contaminated soil will be disposed of according to Federal, State, and local regulations.

Mitigation Measures HAZ-3:
All hazardous materials and hazardous wastes (such as pesticides, paints, solvents, fuel, and oil) will be labeled in accordance with city, state, and federal regulations. Storage tanks over 55 gallons or more would require secondary containment. Any hazardous materials and waste will be stored in watertight containers and manufacturer's application instructions for hazardous materials followed, and no chemicals will be applied outdoors when rain is forecast within 24 hours. Public notification of the use of any such materials (e.g., herbicide or pesticide use) will be posted on site as required by State law.

4.10. Hydrology and Water Quality

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may	☐	☐	☒	☐

impede sustainable groundwater management of the basin?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
(i) result in substantial erosion or siltation on- or off-site;				
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Environmental and Regulatory Setting

The Clean Water Act (CWA), 33 USC §1251-1376, is the primary federal legislation governing water quality and was established to restore and maintain the chemical, physical, and biological integrity of the Nation's waters. The CWA Section 402 establishes the National Pollution Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit is administered in the state of California by the California State Water Resources Control Board (SWRCB). Under Section 402(p) of the CWA, the U.S. Environmental Protection Agency (USEPA) established the NPDES to enforce discharge standards for both point source and nonpoint source pollution. Dischargers can apply for individual discharge permits or apply for coverage under the General Permits that cover certain qualified dischargers. Discharges from construction sites that disturb one acre or more of total land area are subject to the NPDES permit for Discharges of Storm Water Runoff Associated with Construction Activity (Order No. 2009-009-DWQ).

The Section 402 permitting process requires the development and implementation of an effective Stormwater Pollution Prevention Plan (SWPPP). The Project applicant must submit a Notice of Intent to the SWRCB to be covered by a NPDES permit and prepare the SWPPP prior to the beginning of construction. The SWPPP must include best management practices (BMPs) to reduce pollutants and any more stringent controls necessary to meet water quality standards. Dischargers must also comply with water quality objectives as defined in the North Coast Region Water Quality Control Plan (Basin Plan). If Basin Plan objectives are exceeded, corrective measures are required. In 1968, as required under the

Federal Anti-Degradation Policy, the SWRCB adopted an Anti-Degradation Policy, formally known as the Statement of Policy with Respect to Maintaining High Quality Waters in California (State Water Board Resolution No. 68-16). Under the Anti-Degradation Policy, any actions that can adversely affect water quality in surface and ground waters must be consistent with maximum benefit to the people of the State, not unreasonably affect present and anticipated beneficial use of the water, and not result in water quality less than that prescribed in water quality plans and policies.

The Crescent City Local Coastal Plan contains the following policies for the protection of water quality.

> 6.C.1 The City shall ensure that the biological productivity and quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health are maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.
>
> 6.C.3. Development shall be designed and managed to minimize the introduction of pollutants into coastal waters (including the ocean, estuaries, wetlands, rivers, streams, and lakes), to the maximum extent practicable as defined herein.
>
> 6.C.4. Development shall be designed and managed to minimize increases in stormwater runoff volume and rate, to the maximum extent practicable, to avoid adverse impacts to coastal waters.
>
> 6.C.5. Implementation of approved management measures specified for urban areas approved by the State Water Resource Control Board and California Coastal Commission's Nonpoint Source Pollution Control Program to minimize polluted runoff from construction activities and land use activities shall be required of all new development to ensure the safety of public health and the biological productivity of coastal waters.
>
> 6.C.6. Use of feasible and practical best management practices (BMPs) to protect streams and other coastal waters from the adverse effects of construction activities, urban runoff, and agricultural activities shall be required as part of the authorization of new development.
>
> 6.C.7. Long-term post-construction Best Management Practices (BMPs) that protect water quality and minimize increases in runoff volume and rate shall be incorporated in the project design of developments in the following order of priority:
>
> i. Site Design BMPs: Project design features that reduce the creation or severity of potential pollutant sources or reduce the alteration of the project site’s natural stormwater flow regime. Examples are minimizing impervious surfaces, preserving native vegetation, and minimizing grading.
>
> ii. Source Control BMPs: Methods that reduce potential pollutants at their sources and/or avoid entrainment of pollutants in runoff, including schedules of activities, prohibitions of practices, maintenance procedures, managerial practices, or operational practices. Examples are covering outdoor storage areas, use of efficient irrigation, and minimizing the use of landscaping chemicals.
>
> iii. Treatment Control BMPs: Systems designed to remove pollutants from stormwater, by simple gravity settling of particulate pollutants, filtration, biological uptake, media

adsorption, or any other physical, biological, or chemical process. Examples are vegetated swales, detention basins, and storm drain inlet filters.

Site Design BMPs may reduce a development's need for Source and/or Treatment Control BMPs, and Source Control BMPs may reduce the need for Treatment Control BMPs. Therefore, all development shall incorporate effective postconstruction Site Design and Source Control BMPs, to minimize adverse impacts to water quality and coastal waters resulting from the development to the maximum extent practicable.

If the combination of Site Design and Source Control BMPs is not sufficient to protect water quality and coastal waters consistent with Policies 6.C.1, through 6.C.4., development shall also incorporate post-construction Treatment Control BMPs. Developments of Water Quality Concern (see Policy 6.C.10.) are presumed to require Treatment Control BMPs. Treatment Control BMPs may include, but are not limited to, biofilters (e.g., vegetated swales or grass filter strips), bioretention, infiltration trenches or basins, retention ponds or constructed wetlands, detention basins, filtration systems, storm drain inlet filters, wet vaults, or hydrodynamic separator systems.

6.C.8. Development projects shall incorporate Low Impact Development (LID) techniques in order to minimize development impacts of stormwater to coastal waters, qualitatively and quantitatively, unless a credible and compelling explanation is provided as to why such features are not feasible and/or appropriate. LID is a development site design strategy with a goal of maintaining or reproducing the site's pre-development hydrologic functions of storage, infiltration, and groundwater recharge, as well as the volume and rate of stormwater discharges. LID strategies use small-scale integrated and distributed management practices, including minimizing impervious surfaces, infiltrating stormwater close to its source, and preservation of permeable soils and native vegetation. LID techniques include, but are not limited to, the following:

a. Development shall be sited and designed to preserve the infiltration, purification, detention, and retention functions of natural drainage systems that exist on the site, to the maximum extent practicable. Drainage shall be conveyed from the developed area of the site in a non-erosive manner.

b. Development shall minimize the creation of impervious surfaces (including pavement, sidewalks, driveways, patios, parking areas, streets, and roof-tops), especially directly connected impervious areas, to the maximum extent practicable. Directly connected impervious areas include areas covered by a building, impermeable pavement, and/or other impervious surfaces, which drain directly into the storm drain system without first flowing across permeable land areas (e.g., lawns).

c. Development shall maintain or enhance, where appropriate and feasible, on-site infiltration of stormwater runoff, in order to preserve natural hydrologic conditions, recharge groundwater, attenuate runoff flow, and minimize transport of pollutants. Alternative management practices shall be substituted where the review authority has determined that infiltration BMPs may result in adverse impacts, including but not limited to where saturated soils may lead to geologic instability, where infiltration may contribute to flooding, or where regulations to protect groundwater may be violated.

d. Development that creates new impervious surfaces shall divert stormwater runoff flowing from these surfaces into permeable areas in order to maintain or enhance, where appropriate and feasible, on-site stormwater infiltration capacity.

e. To enhance stormwater infiltration capacity, development applicants shall use permeable pavement materials and techniques (e.g., paving blocks, porous asphalt, permeable concrete, and reinforced grass or gravel), where appropriate and feasible. Permeable pavements shall be designed so that stormwater infiltrates into the underlying soil, to enhance groundwater recharge and provide filtration of pollutants.

6.C.9. All development that requires a coastal grading/development permit shall submit a plan to control post-construction stormwater runoff flows and maintain or improve water quality ("Post-Construction Stormwater Plan"). This plan shall specify Site Design, Source Control, and if necessary, Treatment Control BMPs that will be implemented to minimize stormwater pollution and minimize or eliminate increases in stormwater runoff volume and rate from the development after construction.

6.C.10. Developments of Water Quality Concern, defined as those types and classes of development that have the potential for adverse coastal water quality impacts due to the development size, type of land use, impervious site coverage, or proximity to coastal waters, shall be subject to additional requirements for design and implementation of post-construction treatment control BMPs in order to minimize stormwater pollution and protect coastal waters. Developments of Water Quality Concern include the following:

k. All development that will occur within 125 feet of the ocean or coastal waters (including estuaries, wetlands, rivers, streams, and lakes), or that will discharge runoff directly to the ocean or coastal waters, if such development results in the creation, addition, or replacement of 2,500 square feet or more of impervious surface area. "Discharge directly" is defined as runoff that flows from the development to the ocean or to coastal waters that is not first combined with flows from any other adjacent areas.

Discussion of Impacts:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The Project is located adjacent to the Elk Creek estuary, wetlands and riparian areas, and some aspects of construction have the potential to impact these local surface waters and their beneficial uses. The Project is located within the Crescent City Harbor and Smith River Hydrologic Unit, Elk Creek Watershed (Assessment Unit ID: CAR103110000201711150304 53), which is listed as impaired for dissolved oxygen under the Clean Water Act section 303(d). Existing or potential beneficial uses for the Elk Creek Hydrologic Subarea include: Municipal and Domestic Supply (MUN), Agricultural Supply(AGR), Industrial Supply(IND), Industrial Process Supply (PRO), Groundwater Rechard (GWR), Freshwater Replenishment (FRSH), Navigation (NAV), Hydropower Generation (POW), Water Contact Recreation (REC1), Non-Contact Water Recreation (REC2), Commercial and Sport Fishing (COMM), Cold Freshwater Habitat (COLD), Wildlife Habitat (WILD), Rare, Threatened, and/or Endangered Species (RARE), Migration of Aquatic Organisms (MIGR), Spawning, Reproduction, and/or early development (SPWN), Estuarine Habitat (EST), Aquaculture (AQUA) (North Coast Basin Plan 2018).

Ground disturbing activities during project construction could result in the transfer of sediment or polluted runoff to Elk Creek and associated wetlands and Crescent Harbor, potentially degrading surface water quality. Construction could also include the potential use and transport of hazardous materials (i.e., fuel and oils) for construction equipment. Any potential hazardous materials spills could impact underlying groundwater if such material seeps into the soil, or surface water quality if conveyed via overland runoff. Ground disturbing activities could also directly expose groundwater to such materials.

As discussed in Section 4.9, *Hazards and Hazardous Materials*, use of hazardous materials for Project construction activities would be limited and would be performed in compliance with all applicable federal, state, and local regulations (Mitigation Measure HAZ-1 and HAZ-2). The Proposed Project would also implement erosion and sediment control measures (Mitigation Measure WATER-1) and would be required to comply with the NPDES General Permit for Construction Activities. As part of its compliance with this permit, the construction contractor would prepare a SWPPP and prevent polluted runoff from being discharged to surface waters or groundwater (Mitigation Measure BIO-2). Finally, For construction of Project elements (e.g., the proposed Tolowa Interpretive Plaza and Trail) where it may not be possible to achieve a 100-foot buffer from riparian areas (i.e., Elk Creek wetlands) due to spatial constraints, implementation of Mitigation Measure BIO-3 would require stockpiling of any soils at least 100 feet away, clearly marked work limits (e.g., exclusionary fencing), installation of silt fences as needed, as well as seasonal work windows (i.e., summer and early fall dry season) to minimize the risk erosion and sediment discharge from rain events. Compliance with these measures would prevent impacts to surface and/or groundwater quality from occurring.

During operation, as described in Section 4.9, hazardous materials would be stored offsite at designated municipal facilities and the use of hazardous materials onsite would be limited to those needed for park operations and maintenance activities, including disinfectants and cleaners for restroom maintenance and park clean-up, and limited application of herbicides in discrete areas of the park, that would be clearly marked and applied according to local and state regulations (Mitigation Measure HAZ-3). Further, any excess post-construction stormwater runoff would be captured onsite via new rain gardens and filter strips interspersed throughout the Project area near new hardscaped areas (e.g., plazas and parking areas). These measures will meet California stormwater quality standards and be designed to attenuate the flow of runoff and filter sediment and pollutants.

Therefore, with implementation of Mitigation Measures HAZ-1, HAZ-2, HAZ-3, WATER-1, BIO-2, and BIO-3, the Project would not degrade surface or groundwater quality during construction or operation, and impacts would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?

The Project will involve the addition of impervious surfaces through new parking areas and new paved walking paths (i.e., Paths of Culture) throughout the park, with the remainder of the site remaining in use for recreation, landscaped or grassy areas that would continue to facilitate recharge. Increased impervious surfaces can reduce groundwater recharge by preventing water (via precipitation) from infiltrating into the soil and groundwater. While the Project's addition of impervious surface area could limit local recharge to some degree, the relative increase in impervious surface would remain relatively small as portion of the entire site. Further, the Project is not located in a principal recharge area or within a high- or medium-priority groundwater basin. Additionally, the addition of new landscaped areas

and onsite stormwater management measures (e.g., rain gardens and filter strips) facilitate infiltration and would not significantly alter local groundwater recharge rates. During construction, any water demands (e.g., for dust control) would be met using municipal water supply. Therefore, impacts to groundwater recharge would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would, (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows?

The Project will involve the addition of impervious surfaces through new parking areas and new paved walking paths (i.e., Paths of Culture) throughout the park. The relative increase in the impervious surface, while small, would be an increase over existing conditions, but is unlikely to generate any new sources of pollutants beyond what is currently conveyed to the storm sewer system. The site is a flat, 35-acre public park that consists primarily of grassy open space and playing fields, which is subject to occasional ponding during intense storms, but does not convey significant runoff to Crescent City Harbor or Elk Creek and surrounding wetlands. As part of the park improvements, excess runoff from new impervious surfaces would be captured by new onsite rain gardens and filter strips located throughout the Project area, including near the waterfront plaza, new parking areas and new smaller hardscaped plazas, and would thus increase the capacity of the existing storm drain system. Such measures would prevent further erosion and reduce the likelihood of flooding by attenuating surface runoff flows (i.e., slowing water movement) and retaining excess volume. Thus, given the relatively flat topography, that there would not be a significant increase in impervious surfaces relative to existing conditions or additional sources of polluted runoff, and the implementation of new stormwater capturing rain gardens and filter strips to attenuate flow and filter pollutants throughout the site, the Project would not alter the existing drainage pattern of the site or area, and impacts would be less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The Project is located within a tsunami evacuation area. There is the potential risk of releasing pollutants resulting from the use of heavy equipment during construction of the Project. However, given the nature of the project and the limited source/quantity of pollutants associated with park construction activities, as well as the relatively short construction duration, release of any pollutants during a tsunami would not meaningfully contribute to the overall source of potential pollutants that could potentially be released from surrounding infrastructure (e.g., wastewater treatment plant) and other harbor activity. During regular park operations, the limited quantities of any potentially hazardous materials used (e.g., cleaning solvents) would not pose a meaningful risk during a tsunami event. Therefore, impacts would be less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The Project involves upgrades and improvements to a public park. It would not obstruct the implementation of the NCRWQCB's Basin Plan (NCRWQCB. 2018) or conflict with any sustainable groundwater management plan. As stated above, the Proposed Project would not contribute substantial

sources of polluted runoff and would not decrease groundwater supplies, and it is not located within a high- or medium-priority groundwater basin. Therefore, no impact would occur.

Mitigation Measures

Mitigation Measure WATER-1
In conjunction with the required Storm Water Pollution Prevention Plan (SWPPP), the following Best Management Practices (BMPs) will be implemented.

1. Storm drain inlets and drainage courses will be protected with appropriate BMPs during construction activities, such as gravel bags, fiber rolls, berms, etc.
2. Off-site sediment migration will be avoided by installing and maintaining sediment controls, such as fiber rolls, silt fences, or sediment basins.
3. All erosion control fabrics will be without plastic monofilament netting, which can ensnare wildlife) and will consist instead of loose-weave mesh made of biodegradable fibers, such as jute, coconut, or hemp.
4. Suitable BMPs shall be placed outside of construction activities to intercept sediment before it reaches surface waters. These structures shall be installed prior to any clearing or grading activities.
5. BMPs will be maintained throughout the construction period and removed (including trapped sediments) at the end of to avoid any accumulated sediments from being mobilized post-construction.
6. During transport, haul truck beds will be covered when carrying soil, sand, or other loose materials off-site.
7. Effective perimeter controls will be maintained, and construction entrances and exits stabilized to control erosion and sediment discharges from the construction work areas including staging areas.
8. Street tracking will be swept or vacuumed,
9. all exposed soils within work areas will be stabilized immediately following the completion of earthmoving activities to prevent erosion into adjacent wetlands and channels.
10. When rain is forecasted or at the onset of unanticipated precipitation, Project personnel will implement erosion and sediment control measures.

4.11. Land Use and Planning

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Environmental and Regulatory Setting

The Project is within the jurisdictional boundaries of the City of Crescent City and is subject to the City's General Plan, Local Coastal Plan, and Municipal Code. The Project is also within the Coastal Zone and under the jurisdiction of the California Coastal Commission. The Project site is zoned "Coastal Zone – Open Space (CZO), which is intended to, "…to set aside areas to be used for permanent open space to protect health, safety, and welfare of the people and visitors of the Crescent City area and to provide spaces for the location and preservation of unusual natural features, historical and cultural sites, and areas that provide energy, water, and recreational activities."(Crescent City 2011)

The Crescent City General Plan states that existing/compatible uses of the Project area include, "Public road, public parking, recreational trail, picnicking, beach access, beach and harbor activities, slope protection, safety rails and signs, and that its access includes "improved access points, beachcombing, scenic viewing, lateral access to harbor."

The Crescent City General Plan contains the following policies related to land use and planning:

Section 1 Land Use and Planning
Goal 1.C of Public Open Space, of the Crescent City General Plan states:
To enrich and enhance pedestrian/tourist activity in the downtown by creating attractive and well-maintained public open space that will provide a sense of central space or village atmosphere where people could meet, socialize, and eat."
Policies 1.c.3 of Public Open Space, of the Crescent City General Plan states:
"The City shall create linkages from downtown open space to Beachfront Park near Front Street."

Section 5 Recreational and Cultural Resources
Policy 5.A.15 of City Parks and Recreation states: "The City shall continue to maintain and enhance Beachfront Park so that it remains a focal point for community events and waterfront recreation."
Policy 5.D.1 states: The City recognizes the importance of access to and along the shoreline. Therefore, all City-owned beachfront property, including its dry sand beaches, shall be maintained in a manner to protect all existing accessways. If, in the future, the City finds that existing public accessways are inadequate to meet recreational needs, it shall encourage the development of additional accessways consistent with the City's ability to pay maintenance costs and obtain adequate funding to develop said area."

Discussion of Impacts:

a) Physically divide an established community?

The Project will not divide an established community, as the project consists of upgrades to an existing public park. Community access to Beachfront Park would be expanded rather than limited. The existing Beachfront Park itself will not be expanded, and the Project will not result in the loss or change in use of other properties in the vicinity. Therefore, no impact would occur.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The Project area is designated by Crescent City as Coastal Zone – Open Space, and would comply with Chapter 17.71.020(A) of Crescent City Ordinance 837 which permits open space uses, public parks,

playgrounds, and upgrades to existing public parks. The designation applies to existing publicly owned open spaces, parks, and golf courses, and includes some County-owned land. The Project includes modifications to an existing public park and recreational use, which is thus consistent with the Coastal Zone – Open Space designation, and has been specifically designed to accommodate additional and changing recreational opportunities for local residents. Therefore, no impact would occur. See Section 4.16 Recreation for additional analysis

4.12. Mineral Resources

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Environmental and Regulatory Setting

The location of the Project area was historically shoreline and native mud flats. Following the 1964 tsunami which impacted the area, the Project site was developed by placing approximately 18 inches of soil on 10 feet of fill composed of debris, rubble, and sediments from the destroyed city blocks. Because the Project site is generally composed of rubble and debris, and was historically mud flats, no mineral resources exist at the Project location.

Utilizing the California Department of Conservation interactive web map “Mines Online” several active quarries within Crescent City were identified. The closest quarry operation, the Starry Rock Quarry (Mine ID: 91-08-0008) for sand and gravel, is located approximately 3.3 miles northeast of the site. Four other sand and gravel quarry sites, Jacobs Quarry (Mine ID: 91-08-0017) the Sultan Bar (Mine ID: 91-08-0001), the Huffman Bar (Mine ID: 91-08-0002), and the Bedrock Mine Pit (Mine ID: 91-08-0006) are located approximately 7.5 to 8.8 miles north of the Project.

Discussion of Impacts:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

The Project will not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. No known mineral resources exist within the Project area, as it was constructed upon debris and rubble in the aftermath of the 1964 tsunami, and subsequently covered with sandy fill. No resource extraction is planned for the Project area. Therefore, the Project will have no impact on mineral resources.

4.13. Noise

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Environmental and Regulatory Setting

The Project site consists of an existing public park in an urban area near downtown Crescent City. Groups that could be exposed to noise generated by the Project include residential, educational, and recreational land uses near the Project site.

The nearest residences are located approximately 400 feet to the western edge of Beachfront Park on Lighthouse Way, the Crescent Arms Apartments on Front Street located approximately 150 feet north of the park's northern boundary along Front Street, and the Surf Apartments on H St approximately 100 feet north of the park entrance at Stamps Way. The Lighthouse Cove RV Park is located across the Elk Creek wetland area, approximately 350 feet east of the park. Three schools are located in close proximity to the Project, including the Uncharted Shores Academy charter school, located approximately 750 feet north of the site, and Joe Hamilton Elementary School and Crescent Elk Middle School which are located approximately 2,750 feet northwest of the Project. These locations are depicted on Figure 5.

Project Boundary
Tax Lot

Figure 5:
Noise Sensitive Locations

CAMAS
Environmental Regulatory Professionals

1 Inch = 500 Feet
0 375 750 1,500 Feet

The area is subject to noise from vehicular traffic on Front Street as well as nearby Highway 101. Ambient noise at the Project site is also influenced by the nearby residential activities such as landscape maintenance, delivery vehicles, and parking lot activity, as well as harbor-related activity.

The Crescent City General Plan provides the following goals and policies with regard to noise.

> Goal 7.H Noise
> To prevent incompatible land uses, by reason of excessive noise levels, from occurring in the future. This includes protecting sensitive land uses from exposure to excessive noise and to protect the economic base of the city by preventing the encroachment of incompatible land uses within areas affected by existing or planned noise-producing uses.

According to Crescent City Municipal Code (CCMC § 8.18.060), the following are exempt from the City's noise regulations:

- Noise sources associated with construction activity, provided said activities take place only between the hours of seven a.m. and six p.m. or sunset, whichever occurs later, on Monday through Friday, or between the hours of eight a.m. and six p.m. on Saturdays and Sundays (§ 8.18.060(E)).
- Activities conducted on any park or playground during established park hours provided such park or playground is owned and operated by a public entity (§ 8.18.060(B)).
- Any events (including outdoor gatherings, public dances, shows and sporting and entertainment events) conducted pursuant to a special event permit issued by the city. (§ 8.18.060(C)).

Discussion of Impacts:

a) **b) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies / Generation of excessive ground borne vibration or ground borne noise levels**

The Project would generate noise associated with vehicles and equipment used during the construction phase. Project-related noise levels would fluctuate depending on the equipment being used. Construction activities involving the use of heavy equipment such as dozers, asphalt pavers and vibratory rollers would result in temporary increases in ambient noise levels during the day. Additionally, an estimated 950 delivery truck trips would be required to deliver materials over the course of the Project. Typical noise levels for the noisiest pieces of equipment used during Project construction would be approximately 85 dBA at 50 feet for loaders, graders and dozers, and 89 dBA at 50 feet for pavers (FTA 2006).

The closest sensitive receptors to the Project that would be exposed to noise from onsite construction equipment and/or vehicles entering/exiting the park would be the Crescent Arms Apartments on Front Street and the Surf Apartments on H Street. Per City Municipal Code, construction activity would be exempt from any noise regulations, since they would be limited to daytime hours, between 7 a.m. and 6 p.m., Monday through Friday. Further, given the nature of construction (i.e., primarily landscape, non-structural improvements, and park enhancements) and the short duration of construction (approximately 13 months), any increases in ambient noise levels would be temporary and would cease upon completion of each Project element. Further, existing ambient noise levels near the Project area are already influenced by traffic-related noise from vehicles traveling on Highway 101 and Front Street. Finally, while both sensitive receptors are across the street from the park (150 and 100 feet,

respectively), they would be at least 400 feet from any construction activity, further dampening temporary increases in ambient noise levels by 18 decibels (dBs) (utilizing the standard that sound decreases 6 dBs every doubling of distance). Similarly, recreational users of the park would be able to maintain a sufficient distance (i.e., at soccer fields in the central and western portion of the park) such that noise from heavy equipment would be dissipated and would not exceed typical noise thresholds at those locations.

During operation, concerts and events at the amphitheater would increase noise levels beyond existing conditions, potentially impacting adjacent apartment buildings and the Lighthouse Cove RV Park, east of Beachfront Park. However, all events would be permitted through the City and subject to special event permit conditions, including restrictions on the duration and noise levels, and compliance with established hours. Further, such events would only occur 10-15 times a year, primarily in the summer months. Thus, any increases in ambient noise levels would be temporary and would not last more than several hours.

The Proposed Project would not conflict with applicable noise standards established in the local general plan or noise ordinance and would not generate excessive ground borne vibration or ground borne noise levels. Therefore, any impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The Project is located approximately 2.75 miles southeast of the Del Norte County Regional Airport and, according to the Del Norte County Regional Airport Jack McNamara Field Airport Layout Plan Update (WHPacific, 2019), the Project is outside (south and west of) of areas designated as part of the Airport Land Use Compatibility Plan and not affected by an airport land use plan. Beachfront Park is located in the 361-foot airspace contour with no mapped obstructions. Therefore, with this distance from the approach/departure zones the Project will not expose workers on the Project site to excessive noise levels from public airports. Further, the Project will not include dwellings and will not expose park visitors or local residents to excessive noise levels. Therefore, no impact would occur.

4.14. Population and Housing

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental and Regulatory Setting

The City of Crescent City's population is estimated at 6,673 as of the 2020 Decennial Census. There are approximately 1,843 total housing units, with approximately 1,652 units occupied (191 unoccupied units). The current homeownership rate is 36.5% compared to 55.8% for the entire state. (U.S. Census Bureau 2024).

The majority of jobs in Crescent City are in educational services, and health care and social assistance, which comprise approximately 26.6% of the workforce. Other large industries include retail trade (accounting for 18.1% of employment), public administration (accounting for approximately 11.5% of employment), and Professional, scientific, and management, and administrative and waste management services (accounting for approximately 9.8% of employment). (U.S. Census Bureau 2024).

The Project is a public park zoned as Coastal Zone – Open Space (CZO). Housing in the vicinity of the Project site includes residences approximately 500 feet to the western edge of the project on Lighthouse Way, the Crescent Arms Apartments on Front Street located approximately 150 feet north of Beachfront Park, and the Surf Apartments on H St approximately 100 feet north of the park.

Discussion of Impacts:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The Project consists of a public park and would not induce substantial population growth in the area, either directly or indirectly. The Project would include modifications to the existing Beachfront Park area and does not involve extension of roads or new infrastructure, other than utilities serving the park itself. While it is anticipated that there will be increased park usership due to the proposed improvements, such visitors would either be residents who currently reside in the area or visitors passing through on Highway 101. Therefore, the project would not result in inducing unplanned population growth and any impacts would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The Project would not displace any number of existing residents or alter any dwellings. The site is zoned as Coastal Zone – Open Space (CZO) and does not contain residential development. Therefore, no impact would occur.

4.15. Public Services

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain				

acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Environmental and Regulatory Setting

The Project area is just south of downtown Crescent City and has been utilized as a public park for decades. Crescent City Fire and Rescue is located approximately 1,450 feet north of the Project area. The Del Norte Sheriff's Office is located approximately 1,300 feet northwest of the Project, and Crescent City Police Department is located 1,750 feet northwest of the Project. Three schools are located in close proximity to the Project, including the Uncharted Shores Academy charter school, located approximately 750 feet north of the site; and Joe Hamilton Elementary School and Crescent Elk Middle School, located approximately 2,750 feet northwest of the Project. Sutter Coast Hospital is the closest hospital and is located approximately 1.6 miles north of the Project site. The Crescent City Wastewater Treatment Plant is located directly adjacent to the Project on the western side. Two other public parks exist in the vicinity of the Project including Peterson Park, approximately 1,350 feet northwest and Brother Jonathan Park, approximately 3,000 feet northwest The closest airport, Del Norte County Regional Airport is located approximately 2.75 miles northwest of the Project.

Discussion of Impacts:

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?

Beachfront Park is currently served by the Crescent City Fire and Rescue Department that provides 24-hour emergency response. The proposed amphitheater, which can accommodate up to 2,000 people, is anticipated to host 10-15 concerts/events annually, primarily in the summer. The waterfront plaza will also host farmers markets that will draw additional visitors on market days. Beachfront Park and adjacent areas already accommodate these types of events. Therefore, such events would have de minimis impacts on level of service given their frequency and would not impact response times due to the park's proximity to the Crescent City Fire and Rescue. Any impacts to fire protection as a result of the Project would be less than significant.

b) Police protection?

Beachfront Park is currently served by the Crescent City Police Department that provides 24-hour emergency response. As described in 4.15a, additional events such as concerts and farmers markets could increase the need for public safety and police presence during certain times of the year. Beachfront Park and adjacent areas already accommodate these types of events. Therefore, such events would have de minimis impacts on level of service given their frequency and would not impact response times due to the park's proximity to local and county law enforcement. Any impacts to police protection as a result of the Project would be less than significant.

c) Schools?

The Project would not induce population growth and would thus have no impact on local schools in the area. It is anticipated that nearby schools would utilize the park more frequently and benefit from the park improvements. Therefore, no impact would occur.

d) Parks?

The Project may draw additional visitors, both residents and others visiting the area. However, it would not adversely affect nearby parks, would not cause any environmental damage to those parks, and would not create the need for any new parks. The improvements at Beachfront Park are expected to enhance the experience for residents and tourists alike at the park itself. Therefore, no impact would occur.

e) Other public facilities?

It is not expected that the Project will impact other public facilities. The Project would not induce any population growth and would thus not require the provision of any new public facilities, such as hospitals or libraries. Therefore, no impact would occur.

4.16. Recreation

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Environmental and Regulatory Setting

The Project area is located entirely within Beachfront Park, a waterfront community park and open space situated along Crescent City Harbor. Project elements include a Pump Track, new pathways and plazas, an amphitheater, waterfront plaza for farmers markets, an interpretive trail, expansion of the children's play area with inclusive play features, completion of a 1-mile running/walking loop, a new restroom, landscape and irrigation improvements, and various site furnishings. Other improvements

include improvements to the entry to the Del Norte County Visitor/Cultural Center, a plaza for the Tolowa Interpretive Trail, two gateway features immediately northeast of the park, and planted berms near the gateway features along Highway 101. Maintaining the park facilities is the responsibility of the Crescent City Parks and Recreation Department.

Crescent City owns and manages four recreation areas including Beachfront Park. Peterson Park, approximately 1,350 feet northwest of the Project, is a 7.4-acre park consisting of baseball fields, a skate park, community garden and tennis courts. Brother Jonathan Park, approximately 3,000 feet northwest of the Project, is a 1.35-acre waterfront park consisting of lawns, an observation point, memorial and gravesite. Fraser Park, adjacent to Brother Jonathan Park, includes a playground, basket court, swings and an open play area.

Discussion of Impacts:

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The Project includes modifications and improvements to the existing Beachfront Park. The Project would address areas in need of restoration and repair and modernize the existing park. It is expected that increased use will occur from residents and tourists over time, however, regular and normal recreation activities are not expected to result in accelerated degradation or deterioration of the land. Proposed recreational facilities, including the Pump Track, playground, and 1-mile loop for walking/jogging, will be designed to handle the impact of recreational use and weathering. The Project would not cause physical deterioration to other nearby parks in Crescent City. Therefore, any impacts would be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The Project is designed to expand recreational opportunities for residents and visitors to the region. The Project will limit some recreational activities at Beachfront Park during construction, however, the duration of this impact will be limited and phased so that much of the park will remain open, and other nearby recreational facilities will be available for use during this period. Upgrades and new recreational facilities at the site would not include features or equipment that would adversely affect the park or nearby natural areas. The construction of project elements would be improvements to the existing park and result in aesthetic and physical benefits for residents. Therefore, any impacts would be less than significant.

4.17. Transportation

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Environmental and Regulatory Setting

Beachfront Park is located along Front Street south of downtown Crescent City. Front Street is the main access point for vehicular and bicycle access to the park, and sidewalks provide additional pedestrian access. The California Coastal Trail enters from the southeast and northwest of the park, utilizing existing paths through Beachfront Park itself and public streets.

Beachfront Park can be accessed by residents via local streets, whereas visitors would primarily access the park via Highway 101. Highway 101 southbound is approximately 600 feet east of the park, and the northbound lanes approximately 900 feet east. The park's primary vehicle access point is at Stamps Way and Front Street. A secondary access point is at Play Street and Front Street. The site can also be accessed at Battery Street via B Street. Beachfront Park is served by Redwood City Transit, via the transit hub located in front of the Del Norte County Visitor/Cultural Center. Multiple bus routes provide regular access to and from the park at regular intervals throughout the morning and evening, both during the week and on weekends.

The City of Crescent City General Plan / Local Coast Plan includes the following goals and policies addressing the transportation system:

> 3.B. PUBLIC TRANSPORTATION
> Goal 3.B.1: To develop and maintain a safe and efficient public transportation system that reduces congestion and provides viable alternative transportation in and through the Crescent City Planning Area.
> Policy 3.B.1.: Where new development would result in significant demand for increased public transit services, easements for, and provisions for development of, sheltered public stops for transit patrons shall be made a condition of the approval of such development.
>
> 3.C. BICYCLE TRANSPORTATION
> Goal 3.C.1 To encourage the use of the bicycle as an alternate, energy efficient mode of transportation within the city and to develop a system of bikeways and bicycle parking facilities which will safely and effectively serve those wishing to utilize bicycles for commute and recreational trips.
> Policy 3.C.1: The linkage of sidewalks and walkways with bike and pedestrian trails leading to and through outdoor recreational areas such as parks and schools, as well as commercial areas, shall be integrated into new development.
> Policy 3.C.2: The Harbor-City bicycle route, one of segments of the California Coastal Trail network within the municipal bounds of Crescent City, represents one of the City's major coastal public amenities, providing access to numerous scenic ocean and harbor views, and recreational

opportunities situated along the route. This bicycle route starts at Pebble Beach Drive in the City and follows Pebble Beach Drive and Taylor Street before merging onto Fifth Street. The route continues down Fifth Street then turns onto A Street. The bicycle route continues along A Street to Battery Drive. At Battery Drive the route enters Beachfront Park, paralleling Howe Drive east along a multiple-use pathway. The route then follows the northern bank of lower Elk Creek to a bridge crossing over the watercourse adjacent to Highway 101 South. The route then reverts to a streetside trail from the northwestern end of Sunset Circle to the southerly city limits at King Street. The route continues through the unincorporated Harbor area to South Beach. Any relocation of the City portions of the route in conjunction with new development may only be authorized if relocation would be consistent with all relevant coastal policies.

3.D. PEDESTRIAN TRANSPORTATION
Goal 3.D.1 To encourage and facilitate walking throughout the city.
Policy 3.D.1. The extension of sidewalks, trails, and walking facilities shall be provided throughout the city limits to allow for convenient and safe pedestrian movement. Exactions for dedication of rights-of-way, easements, and/or construction of pedestrian improvements may be required in the permitting of new development, where appropriate, based on a fair-share pro rata basis.

5.B. RECREATIONAL TRAILS
Goal 5.B.1. To develop a system of interconnected hiking, riding, and bicycling trails and paths suitable for active recreation and transportation and circulation.

Discussion of Impacts:

a) **Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

The primary access route to the Project site would be from Highway 101 to Front Street and then to either Stamps Way or Play Street entrances. During the construction period, an estimated 950 delivery truck trips would be required to deliver materials. Construction would generally occur between the hours of 8 a.m. and 6 p.m., Monday through Friday. As a result, traffic is expected to increase somewhat during this time. However, the number of trips per day associated with project construction activities would be minimal compared to the thousands of vehicles traveling on Highway 101 each day. Further, these trips would be phased out over the entire duration of construction activities. Additionally, construction vehicles used for the project would be parked onsite; however, it is not anticipated that more than 20 workers would be onsite at any given time. As such, Project-related trips during construction would not be expected to measurably affect traffic levels along Highway 101 or Front Street, and phasing of construction would further reduce any potential traffic impacts.

During construction, there could be temporary disruptions for pedestrians and cyclists entering or exiting the park at certain periods during materials delivery, depending on the number of trucks required during each construction phase. Additionally, Play Street will be temporarily closed during installation of the new children's play area and parking lot improvements; however, construction phasing would occur in such a way that access via Stamps Way would be open (see Section 3.9.2, Access and Staging). The contractor would also coordinate with the City to establish detours on Front Street around active construction work areas to safely direct traffic, pedestrians and bicyclists to and/or through the site. Further, other measures could include scheduling major truck trips and deliveries to avoid peak

traffic hours and posting warnings and detour signs for motorists. Any impacts during construction would be temporary and short in duration.

Finally, construction activities would primarily avoid disruption to transit service operations, as the Project would not result in temporary road closures or substantially increase traffic on Front Street or adjacent streets. It is possible that temporary lane closures may be necessary to construct berms in the grassy areas on either side of the unidirectional portions of Highway 101 that go through downtown Crescent City, also known as "S" curves. In such a case, the contractor would follow standard temporary lane closure procedures, including placing cones to alert drivers and using flaggers to direct cars and buses to utilize the other vehicle lanes on Highway 101 to avoid any potential conflicts. Any closures would be on a temporary basis and only occur during construction. During improvements to the Del Norte County Visitor/Cultural Center (i.e., removing steps, etc.), the transit center/bus stop would be temporarily moved to a nearby location (e.g., across the street from the current location along Front Street or just to the northeast on K street); thus, any impacts would be limited and short-term.

During park operation, periodic maintenance would be required for park clean-up, irrigation/landscaping and for general operational needs. This would involve one to three individuals traveling to the project site weekly, which would not generate more than a few vehicle trips at a given time. As a result, operation of the Project would not result in a substantial increase in traffic. In general, operation and maintenance activities associated with the proposed Project would not result in any impacts to bicycle, pedestrian, or public transit facilities. During concerts or large events at the amphitheater, additional traffic would be expected along Highway 101 and Front Street, and potentially side streets, due to the temporary increase in visitors and the need for additional parking. These events would primarily occur during the summer months (no more than 10-15), and the City would post signs to alert motorists, pedestrians and bicyclists of increased traffic or delays on Front Street, and utilize flaggers to direct traffic and avoid any potential conflicts.

Overall, the Project would comply with the goals of the City of Crescent City General Plan / Local Coast Plan, and Del Norte County Regional Transportation Plan (2021), and the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Therefore, impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

CEQA Guidelines section 15064.3(b) "Criteria for Analyzing Transportation Impacts" provides the following regarding land use projects:

> (1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

Beachfront Park is located adjacent to a major transit stop for Redwood Coast Transit. Additionally, given its location adjacent downtown Crescent City and U.S. Highway 101, it is centrally located for all transportation routes. As such, the Project would not result in an increase in VMT among residents of Crescent City accessing the park, who would continue to do so by car, bicycle, foot or bus, as occurs

under existing conditions. While the Project has the potential to draw additional visitors, it can be presumed that many of those visitors would already be travelling along the Highway 101 corridor. During special events or concerts, the Project may induce additional vehicle trips from outside the area; however, such events would occur no more than 10-15 times annually (primarily concentrated during the summer months) and would not result in a significant increase in vehicle miles traveled over the existing condition on non-event days. Further, the Del Norte County Regional Transportation Plan (2021) notes that Crescent City VMT will increase approximately 4.5% (28.9 VMT to 30.3 VMT) from the years 2020 to 2030. Any temporary increases in VMT would be commensurate with the predicted increase in VMT. Therefore, under CEQA Guidelines section 15064.3(b)(1), the Project will result in a less than significant impact.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Project would not include modifications to road configurations that could create sharp curves or dangerous intersections. The Project would not include new vehicular access that would result in safety hazards. While new parking areas will be installed, all designs will be done according to the local building code and be accessible to emergency vehicles and would thus be compatible with the continued use of the park. This impact would be less than significant.

d) Result in inadequate emergency access?

During construction, emergency access could be temporarily restricted from the presence of haul trucks during the construction of certain Project elements (e.g., those requiring fill for earthworks, such as the amphitheater or "S" curves). However, vehicular and pedestrian access along Front Street would be maintained using standard traffic control measures, as described in 4.17a, which would facilitate emergency access to and from the site. Maintenance activities in the vicinity of the main park entrance at Stamps Way, such as landscaping or refuse collection, would not interfere with emergency access along Front Street. Further, traffic from regular park use following completion of the Project would not substantially impair emergency access on Front Street, Highway 101, or other local streets. As described in 4.17a, special events and concerts at the park could result in temporary increases in traffic along Front Street and Highway 101; however, the City would utilize signage and flaggers to direct traffic, thereby avoiding any potential conflicts and maintaining emergency access. Therefore, any potential impacts related to emergency access as a result of the Proposed Project would be less than significant.

4.18. Tribal Cultural Resources

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k)?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency, in	☐	☒	☐	☐

its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Environmental and Regulatory Setting

This section evaluates the potential impacts to tribal cultural resources from the Project. The impact assessment is based upon cultural resource investigations referenced above in Section 4.5, *Cultural Resources*.

California Assembly Bill (AB) 52 requires that lead agencies consider the effects of projects on tribal cultural resources and that consultation with federally and non-federally recognized Native American Tribes take place early in the environmental review process. As defined in PRC §21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are listed, or determined to be eligible for listing, on the national, state, or local register of historical resources.

AB 52 letters were sent in February 2024 to tribal governments to provide notification of the City's decision to undertake the Project and to provide consultation opportunities (see Appendix E). The letters were distributed to the Tribal Historic Preservation Officers (THPO) at the Tolowa Dee-ni' Nation, Melochundum Band of Tolowa Indians, Elk Valley Rancheria, Yurok Tribe, Pulikla Tribe of Yurok People, (formerly Resighini Rancheria), Karuk Tribe and the Cher-Ae Heights Indian Community of the Trinidad Rancheria. All THPOs declined the invitation for government consultation with the City of Crescent City. The Tolowa Dee-ni' Nation requested access for monitoring by Tribal staff during any excavation activities, and this will be incorporated into the Project implementation as Mitigation Measure CULT-1 (see Section 4.5, *Cultural Resources*).

Discussion of Impacts

a) Cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k)?

The City submitted a requested to the Native American Heritage Commission (NAHC) for presence of scared sites at or near the Project area and a list of tribes with cultural affiliation to the area. On January 22, 2024, the NAHC responded noting that the result of the Sacred Lands File check was positive and recommended contacting affiliated tribes. Through informal AB 52 consultation (see Section 4.5, *Cultural Resources*), consulting tribes have indicated that no known tribal cultural resources are present within the Project area. A review of the findings of a recent cultural resource investigation in the vicinity of the Project area also did not identify specific resources. Additionally, no known tribal cultural resources are known to be listed or eligible for listing in the California Register of Historical Resources. However, a letter from the Northwest Information Center (NWIC), also dated January 22, 2024, suggested that there

is “high potential” for Native American archaeological resources to be within the project area. Due to the area being developed with rubble from the 1964 tsunami and covered with 18 inches of sandy fill, the original mudflat soils are covered with up to ten feet of fill. Mudflat soils will not be disturbed as part of the Project.

Should a tribal cultural resource be inadvertently discovered during ground-disturbing activities an Inadvertent Discovery Plan (Mitigation Measure CULT-2) will be in place such that work would be temporarily halted and qualified professional archaeologists would be contacted for evaluation. Further, the Tolowa Dee-ni’ Nation requested access for monitoring by Tribal staff during any excavation activities, which will also be incorporated into the Project implementation (Mitigation CULT-1). Therefore, with the incorporation of Mitigation Measures CULT-1 and CULT-2, any potential impacts to tribal cultural resources will be reduced to a less than significant level.

b) Cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Although not anticipated, there is the potential for inadvertent discovery of archaeological or human remains that could be determined to be tribal cultural resources, during construction of the proposed Project. In such a case, to ensure that such resources will not be adversely impacted, the City of Crescent City (lead agency under CEQA) will ensure that Mitigation Measures CULT-1 and CULT-2 are incorporated into the project. With the inclusion of these measures, any potential impacts to tribal cultural resources will be reduced to a less than significant level.

Mitigation Measures

Mitigation Measure CULT-1
See Chapter 4.5, *Cultural Resources*.

Mitigation Measure CULT-2
See Chapter 4.5, *Cultural Resources*.

4.19. Utilities and Service Systems

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion of Impacts:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The Project would require similar volumes of water for restroom facilities (e.g., handwashing, toilet flushing, etc.) and landscape irrigation as are currently used. While certain project elements such as the rain gardens/filter strips and other vegetation associated with the amphitheater and waterfront plaza, would increase demand somewhat, water-efficient fixtures and drought tolerant landscaping would make the Project more water-efficient than under existing conditions. While it is anticipated that large events and concerts may result in increased water usage, portable restroom facilities would be installed to accommodate the increased demand. This would occur on a temporary basis (between 10-15 events per year) and would not represent an appreciable decrease in the City's water supply, which is approximately 803 million gallons per year (MGY) as stated in the 2020 Urban Water Management Plan authored by Freshwater Environmental Services (City of Crescent City 2021). Further, the Project's water demand would be a fraction of the City's overall water demand and would not require construction of any new treatment facilities or expansion of existing facilities. Slight increases in volumes of wastewater may also occur during these events from use of the permanent restroom facility; however, any increases would be within the capacity of the Crescent City Wastewater Treatment Facility, and portable restrooms would temporarily be installed. During construction, water used for dust control, maintaining soil moisture and irrigation would originate from municipal supplies but would be used intermittently and on a temporary basis over the 13-month construction period. Portable restrooms would be used for construction workers as needed.

The Project would result in increased impervious surface, which would create additional stormwater runoff compared to existing conditions. However, the additional stormwater runoff will be attenuated and infiltrated via new filter strips and rain gardens designed to meet state water quality standards. These facilities will be located throughout the Project site, proximate to new hardscape surfaces such as

around the amphitheater and waterfront plaza, to avoid overland runoff to Crescent City Harbor or the Elk Creek wetlands.

During construction, equipment, trailers, and security lighting would require electrical power for operation. It is anticipated that power needed during construction would be provided from adjacent power lines in the park. During operation, demand for power would include bollard, entryway, and restroom lighting, as well as any digital components for the interpretive nodes. Power would also be utilized for food trucks (via docking stations) and for concerts held at the amphitheater. As such, additional connections to existing electrical lines would be established. While energy use is expected to increase during concerts or larger gatherings, such events would only occur between 10-15 times a year and, as such, any increases in energy use will be temporary and intermittent. Additionally, existing infrastructure such as for the Del Norte County Visitor/Cultural Center and Fred Endert Municipal Pool will be protected during construction, and will not be modified as part of the Project; Finally, there is no expected increase in propane use as a result of the Project.

Overall, the Proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage facilities, and would not require or result in new or expanded electric power, natural gas or telecommunications facilities. Therefore, any impacts would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

During construction water would be supplied by the City of Crescent City and primarily be used for dust control, increasing soil moisture content, and irrigation needs. Demand is expected to increase somewhat during plant establishment for project elements requiring new vegetation and/or grasses. The estimated water demand during Project construction would be approximately 10,000 gallons over 13 months.

During operation, vegetation would be irrigated from municipal water supplies via new PVC lines connected to metal service lines. Water efficient sprinklers would be installed and automated for water conservation. Additionally, the new restroom facility would use low-flow toilets and energy-efficient fixtures. While it is anticipated that large events and concerts may result in increased water usage, primarily through increased use of restroom facilities, this would occur on a temporary basis (10-15 events per year), and would not represent an appreciable decrease in the City's water supply, which is approximately 944,265 MGY (Crescent City 2021).

Water use during construction and operation would represent a de minimis amount of the City's overall water demand. Further, the City's water system is expected to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years over the next 25 years (City of Crescent City 2021). Finally, use of water-efficient fixtures for irrigation and restrooms will conserve water more efficiently than under existing conditions. Therefore, any impacts would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

During construction, there would not be an appreciable increase in municipal wastewater, as workers would be served through existing public restroom facilities in addition to portable restrooms that would be installed as needed. Upon completion of park improvements, employees and visitors would generate wastewater from toilet flushing and hand washing from the new restroom facilities. While it is

anticipated that large events and concerts may result in increased wastewater generated from the Project site, this would occur on a temporary basis, and would not represent an increase in flows that would affect the remaining capacity at the Crescent City Wastewater Treatment Facility, which can treat daily flows of up to 13 million gallons per day (MGD) (Del Norte LAFCo 2019). Further, portable toilets would be installed temporarily for such events. Therefore, the wastewater treatment provider would have sufficient capacity to serve the Proposed Project, and any impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The Project would generate construction debris as result of site preparation, including clearing, grubbing, grading, excavation and importing and placing fill. This would also include removal of existing pavement from parking lots, and any existing surfaces or structures (e.g., existing bathroom facility). Upon completion of park improvements, the Project would generate waste associated with regular park activities collected in waste receptacles throughout the park and in restrooms. While it is anticipated that large events and concerts may result in increased waste generation, this would occur on a temporary basis, and would not represent a significant increase in solid waste that would be in excess of the capacity of local waste facilities. During construction and operation, solid waste would be transferred to the Dry Creek Landfill in Eagle Point, Oregon, which has a capacity of over 47 million tons remaining (Del Norte LAFCo 2019). Any hazardous waste generated during construction would be transported to the closest hazardous waste facility for disposal or recycling, in compliance with local, state and federal regulations.

Thus, the Proposed Project would not generate solid waste in excess of state or local standards, in excess of the capacity of local infrastructure, or impair the attainment of any solid waste goals. Therefore, this impact would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

During both construction and operation, the Project would comply with all management and reduction statutes and regulations related to solid waste, including the California Integrated Waste Management Act, which requires all California cities to implement programs to divert 50 percent of solid waste, and the California Solid Waste Reuse and Recycling Access Act, which requires development projects applying for building permits to include adequate areas for collecting recyclable materials. As such, the Project would have recycling bins alongside trash receptacles throughout the park, and would provide additional areas for recycling and composting during large events and concerts to account for temporary increases in waste generation. Solid waste and recycling services would continue to be provided by Recology Del Norte and brought to the Del Norte County Transfer Station in Crescent City. Therefore, any impacts would be less than significant.

4.20. Wildfires

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Environmental and Regulatory Setting

The California Department of Forestry and Fire Protection (CALFIRE) designates fire hazard severity zones for areas under state and local jurisdiction. Crescent City is classified as an Incorporated Local Responsibility Area (LRA) by CALFIRE. where the local government is responsible for wildfire protection, which is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract. The Project is not in mapped areas with a high risk of wildland fire hazards. The Project site is located in a less than Moderate Fire Severity Zone. Surrounding areas on the outskirts of the City are located within a Local Responsible Area (LRA) Moderate Fire Severity Zone. The closest High or Very High Severity Zone (located in a State Responsible Area) is approximately 7 miles to the east. (CalFire 2025).

The Crescent City Fire & Rescue Master Plan (2019) describes four fire stations in Crescent City. The Washington Station located approximately 1.6 miles from the Project, also serves as the Emergency Operations Center for both the City of Crescent City and Del Norte County. The Crescent City Station, located approximately 1,300 feet north of the Project, is the second largest fire station in the county.

Discussion of Impacts:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

The Project would not result in changes to existing emergency response or emergency evacuation plans. Road modifications, and removal of infrastructure or utilities that may result in changes to emergency plans, will not occur as part of the Project. Potential traffic increases may occur as a result of construction-related vehicle trips and trucks traveling to and from the Project site along Front Street. The potential increase in traffic could temporarily impair response times to an emergency at or near the Project. However, constructed-related traffic would be temporary with a limited number of construction vehicles traveling to and from the Project site on a daily basis. As described in Section 4.9f, road closures are not anticipated during construction and standard traffic control measures (e.g., flagging, signage, barricades and cones) would be used as needed to ensure access to Front Street at all times during

construction. The Project construction would not impact evacuation routes, nor the ability to evacuate in the event of a wildfire.

Once the Project is complete, traffic along Front Street would primarily be comparable to current conditions. However, potential increases in traffic may occur during special events. In such cases, the City would implement standard traffic management measures to facilitate the movement of people and traffic, including traffic police to direct traffic and signage to direct vehicles to appropriate parking, similar to current practices during such events. Therefore, the Project would not substantially impair an adopted emergency response plan or evacuation plan, and impacts would be less than significant with mitigation.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The Project site includes vegetation that may be susceptible to fire in dry conditions, however, given that much of the park is irrigated and otherwise located in a moist environment, it is not expected that the Project will significantly contribute to wildfire risk. Additionally, the site is flat and would not result in difficulty accessing and suppressing fires or fire risks. Surrounding the Project site are concrete sidewalks, asphalt streets, and concrete structures, which are unlikely to be a conduit for fire. Therefore, impacts from a wildfire or the uncontrolled spread of a wildfire would be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Parking lot improvements and utility connections would occur during Project construction; however, because it is not located in a fire-prone area, installation of any underground utilities would have little fire risk. Further, adequate fire suppression (e.g. hydrants and firefighting equipment) would be maintained onsite during construction, and all work would comply with applicable federal, local, and state fire prevention regulations, including the California Fire Code. Once complete, all utilities would be buried, and would only be accessed to perform routine maintenance. Therefore, any utility modifications will not require additional fire prevention to be implemented, and the Project would not result in any temporary or ongoing impacts to the environment from infrastructure installation or maintenance. Impacts would be less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The Project site is a flat public park which is adjacent to the Pacific Ocean. There is no history of landslides or slope instability. As described in 4.20b and c, the park is not located in a fire-prone area, and it is not anticipated that modifications to the site would results in wildfire. As such, the Project would not expose people or structures to significant risks from downslope or downstream flooding or landslides as a result of post-fire slope instability or drainage changes. Therefore, no impact would occur.

4.21. Mandatory Findings of Significance

Would the Project	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion of Impacts:

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As evaluated in this Initial Study, the Project would not substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory. Effects to rare plants and environmentally sensitive habitat areas will be mitigated to a less-than-significant level and there will be no substantial reduction in populations.

Mitigation measures have been incorporated to reduce impacts related to Air Quality (AQ-1), Biological Resources (BIO-1 through 4) and Cultural Resources (CULT 1 and 2), Hazards and Hazardous Materials (HAZ-1 through 3, Hydrology and Water Quality (WATER-1), and Tribal Cultural Resources (CULT 1 and 2) to less than significant levels. With implementation of the required mitigation measures, impacts to the environment would be less than significant (see Appendix H for the Project's *Mitigation Monitoring and Reporting Plan*).

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355). Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. In the case of the Project, a cumulative impact could be a nearby construction project, or another physical action in the vicinity of the project area that could compound impacts to wildlife or habitat. Recently completed past projects, projects currently under construction, and probable future projects that would overlap with the proposed Project construction and/or operation and maintenance are listed below. These projects could result in similar impacts to the same environmental resources. These include:

Project	Project Location	Project Phase	Project Description
Crescent City Storm Drain Project	Front, 2nd, 3rd, 4th and 5th Streets, as well as portions of C, D and F Streets	Completed in 2023	Installation of new Storm Drains in existing roadways and developed lots that will tie into outfall and water treatment tanks, connected to the drain outlet located just south of the Crescent City Wastewater Treatment Facility.
Front Street Improvements	Front Street between D Street and K Street	Completed in 2024	Subsurface infrastructure improvements, as well as landscape, street modification and roadway design modifications for vehicles, pedestrians, and bicyclists.
Pump Track	Beachfront Park (NW corner)	Completed in 2024	Construction of Phase 1 of a pump track using imported fill material from the Front Street Improvements, with remaining work to be completed under the Beachfront Park Improvements Project.
Beachfront Park Improvements Project: Future Phases	Beachfront Park (various locations)	Planned future phases (to begin 2025 and continue as funding is available)	Phase 1B-1D: Renovation of Beachfront Park and the Del Norte County Visitor/Cultural Center Phase 2: Completion of additional paths, reconfiguration of soccer fields, new basketball and pickleball courts, new additional picnic facilities. Phase 3: Daylight Elk Creek between Highway 101 and N Street. Phase 4: Improved connections from Beachfront Park to Battery Point Lighthouse and beyond to Pebble Beach Drive.

Construction of the Proposed Project would overlap with the Front Street Improvements project. As such, construction of these projects, could result in cumulative impacts related to air quality, biological resources and cultural resources, hazards and hazardous materials, hydrology and water quality, and tribal cultural resources. However, the Front Street Improvements would be coordinated with the Proposed Project and are designed to enhance public safety through enhanced bicycle lanes, calm traffic

for pedestrians, and improve parking for Beachfront Park visitors, resulting in overall net benefits to the Project. And the Pump Track is sequenced such that it would be completed as part of the Proposed Project, and is thus already factored into the overall construction plan. Finally, because funding sources have not yet been identified for future phases of Beachfront Park improvements, the time horizon in which such improvements would be implemented is uncertain. Regardless of when they would be implemented, Beachfront Park would continue to operate during construction, and implementation of these elements (e.g., new soccer and fields and courts) would be short in duration and/or would not disrupt park activity (e.g., daylighting Elk Creek or improved connections to Battery Point Lighthouse). While it is possible renovations to the Del Norte County Visitor/Cultural Center could disrupt transit operations, these activities would be temporary and alternative arrangements would be made to ensure that buses would continue to operate (i.e., during Phase 1D) during construction.

Therefore, given that the construction duration of the proposed Project would be short term and construction would comply with mitigation measures identified throughout Chapter 4, and that operation and maintenance activities associated with the proposed Project would not result in any cumulative impacts, the Proposed Project's cumulative contribution would not be cumulatively considerable. In addition to these considerations, because the Project is being completed to comply with the California Coastal Act and other state and federal requirements, there would be no additional growth inducement over what was analyzed in the City's General Plan and Local Coastal Plan (City of Crescent City 2001 & 2011). Therefore, the Proposed Project would result in a less than significant cumulative impact.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The Project has been designed and mitigated to avoid significant environmental impacts. As discussed in the analysis throughout this Initial Study, the Project will not have environmental effects that would cause substantial adverse direct or indirect effects on human beings. The project will in fact benefit humans, as Beachfront Park will be upgraded and improved to better serve the general public. Therefore, impacts would be less than significant.

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