

Draft Initial Study and Mitigated Negative Declaration
for
Sacred Groves Kneeland Cemetery

Conditional Use Permit

California Environmental Quality Act (CEQA)

September 15, 2025

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Project Title

Sacred Groves Kneeland Cemetery

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Property Owner of Record

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APNs 314-131-088, 314-131-092, and 314-131-091

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Background Information

1. PROJECT LOCATION

The project area is approximately 44.7 acres.

The project occupies Assessor Parcel 314-131-092 the Southeast $\frac{1}{4}$ of the Northeast $\frac{1}{4}$ of Section 9, and approximately 10 acres in Assessor Parcel 314-131-091 in the southeast $\frac{1}{4}$ of Section Township 4 North, Range 2 East, Latitude 40°74' N, Longitude 123°95' W. Figure 1. A more detailed view of the project boundaries can be seen in **Appendix A -Site Plan**.



Figure 1. Project location, Kneeland, Humboldt County, CA.

2. General Plan Designations

Agriculture Grazing (AG) and Timber (T)

3. Zoning Ordinance

Agricultural Exclusive (AE) and Timber Protection Zone (TPZ)

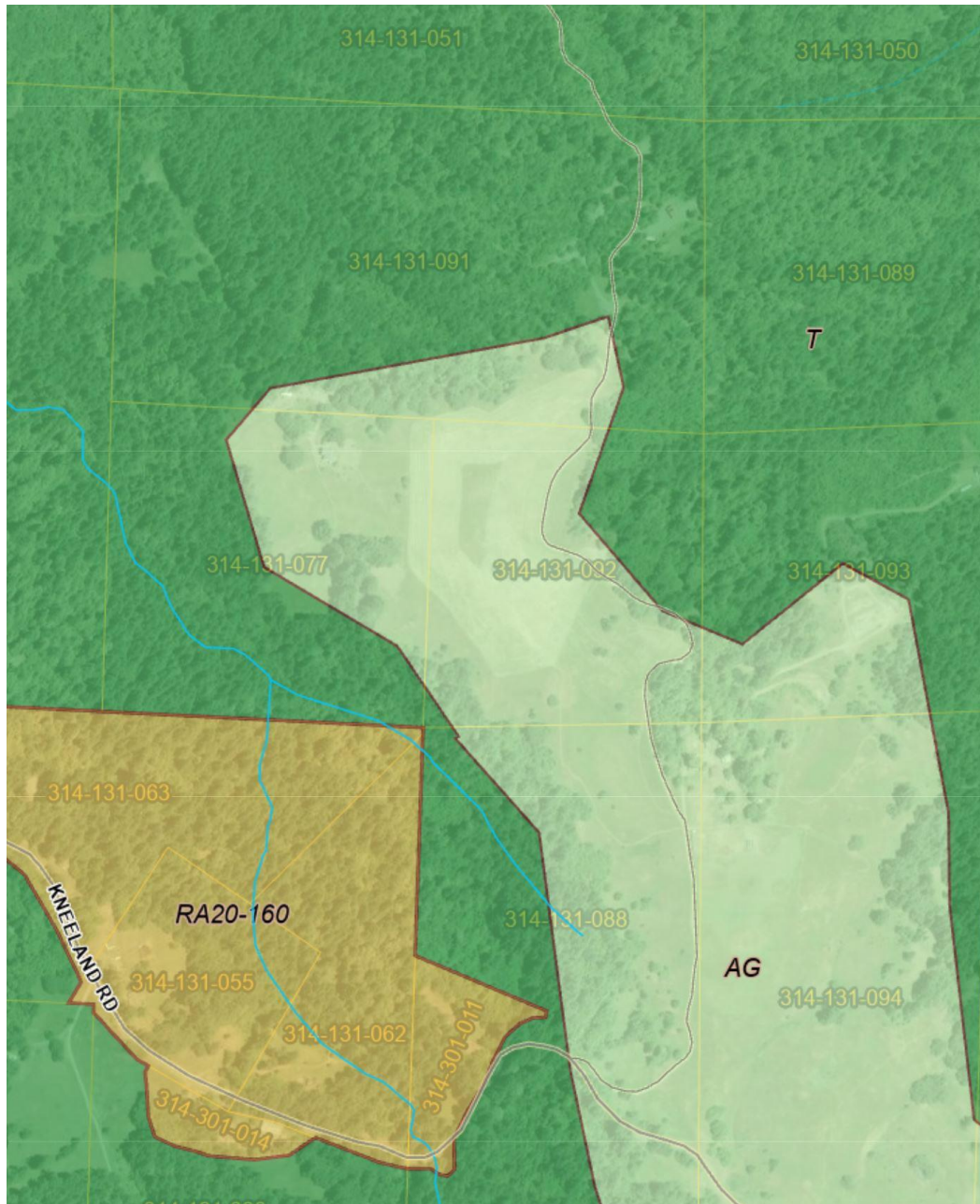


Figure 2. General Plan land use designations Agricultural Grazing and Timber.

4. DESCRIPTION OF PROJECT:

The Sacred Groves Green Conservation Burial Cemetery Project is located on private property at 8015 Kneeland Road (Humboldt County Rd. No. F6F060), a paved county-maintained road. From the junction with Kneeland Road a private aggregate-surface access road traverses approximately 4,200 feet down an open prairie ridgeline to the northern boundary of the project area (Figure 3). The project area is northeast of Kneeland Road and will involve 44.7 acres, 27.9 acres of predominately open grassland agricultural land and 16.8 acres of second-growth oak-conifer woodlands. The private access road currently serves two rural residences and an animal rescue nonprofit operation. The project is approximately 1,335 feet above sea level. The project area is not visible to the public.

The project will provide private burial services and plots for green conservation burials and ongoing vegetation management. Green conservation burial is a means for people to return to the earth in harmony with the land, nourishing the roots of trees in protected Family Groves (plots). The project introduces a new burial method it calls “Entreement” by placing people in the root zones of trees and native grasses, allowing decomposing bodies or ashes to become part of the ecosystem, nourishing trees and grasses. Sacred Groves will accept for entreement:

1. Unembalmed bodies
2. Cremated Remains
3. Aquamation (alkaline hydrolysis) remains
4. Human Compost (Natural Organic Reduction) (*after 2027*)
5. Small Pets such as dogs, cats, hamsters

Following the principles of natural-green burial, Sacred Groves will not accept embalmed bodies (with case-by-case consideration of nontoxic embalming), coffins, caskets, or shrouds that are not composed of natural materials that are fully and readily biodegradable and will not allow any vaults or grave liners. The project’s green conservation burial practices will be entirely consistent with State and local Health and Safety regulations.

Decomposition of dead bodies does not introduce pathogens and it does not release polluting agents into soil or water under average circumstances in a cemetery. Soil is comprised of living organisms that can decompose organic matter. The soil environment functions as a highly effective natural filter and biological reactor that contains, attenuates, and rapidly neutralizes human-borne pathogens. The combination of physical filtration, chemical adsorption, and overwhelming microbial antagonism within the soil matrix ensures that decomposition occurs safely and locally. The primary mechanism preventing the offsite transport of microorganisms is the physical structure of the soil itself. Suitable soils for burial are present on the proposed site, based on survey and analysis by a professional soil scientist and green burial expert. Beyond its physical properties, in-situ soil is a living, biologically active ecosystem. The native microbial community within a healthy soil is the most critical factor in neutralizing pathogens from a decomposing body. In essence, the soil does not act as a passive storage medium but as an active, aggressive, and highly efficient biological treatment system.

Burials pursuant to California Health & Safety Code Section 8113.1 (a) (2025) will be equal to or greater than 18 inches from the top of the body or coffin. Burials will be conducted in low density spacing and will mostly be clustered in family groves, or plots, with 4-8 trees, these plots will be of varied sizes, 500 to 1,600 square feet, accommodating 2 to 8 graves per grove/plot, each burial will utilize a maximum space of 32 square feet with the typical maximum disturbance area of 4 X 8 feet. With a projected plot density of 5-15 groves/family plots per acre that would support a grave density of 10 to 120 graves per acre. This maximum grave density of 120 graves per acre is about 10% of conventional cemeteries. Single burials outside of groves/family plots will also be accommodated at a maximum grave density of 120 graves per acre, in the oak-conifer woodlands and in the open grass prairie.

Once a burial plot and grave site have been selected a botanical survey for protected sensitive species will be performed, any invasive species present will be removed. Each grave will be dug by hand. Soil horizons (A, B and C) will be sorted on a tarp or plywood sheet next to the grave. After placement of the body, the soil horizons will be returned to the grave in reverse order (C, B and A). In grassland areas efforts will be made to remove sod in intact chunks which will be replaced after the burial. This action reconstructs the natural soil horizon, placing the living soil community to thrive and provides a fertile bed for rapid decomposition and revegetation.

The process of digging graves and burying the dead will be conducted in a manner that respects and preserves the health of established trees. The forest land burial process involves an assessment of anchor root location, orientation, distances from trees, and site selection. Grave digging will prioritize root zone protection, excavation techniques, root pruning and care, and soil management.

Individual plots will be planted with a small grove of California native trees or left as grassland. The family plots or groves where cemetery patrons choose to plant trees will be part of the project's Oak Savannah conversion that is fully described in Appendix I. Site-specific burials and entreelement of cremated remains or composted remains within the existing oak-conifer woodlands will also occur with no removal of existing trees. There will be no above-ground structures involved with the burials, only planted tree seedlings. At the projected rate of one burial per week, the Sacred Groves 44.7-acre cemetery could have a 104+-year life until it is fully occupied.

The private access road entrance within the first fifty feet at the intersection with the County Road will be re-aligned, graded, and surfaced to meet current County standards (Appendix C). An automated locked gate will be installed outside of the County right-of-way. Along the access road six existing turnouts will be upgraded (Figure 4). The private access road meets Cal Fire's Fire Safe Road requirements (Appendix J). The private access road owned by the Almquist Family Trust has three right-of-way easements: 1) for an AG/TPZ parcel (AP 314-131-077) with a residence to the west of the project, 2) for a TPZ parcel north of the project owned by Humboldt Redwood Company (AP 314-131-028), and 3) for a AG parcel (AP 314-131-094) with a residence southeast of the project near Kneeland Road.

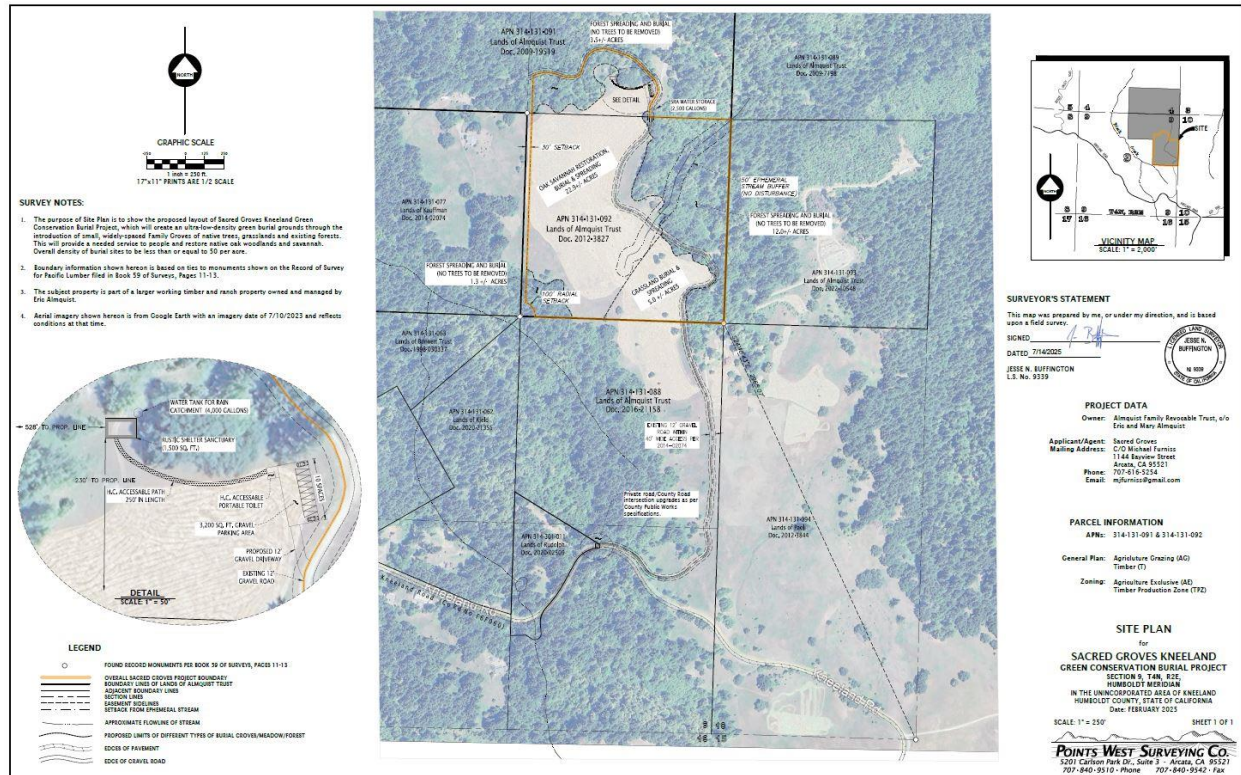


Figure 3. Project covers approximately 45 acres, 27.9 acres grassland and 16.8 acres woodland, refer to **Appendix - A, Site Plan**, for full size image.

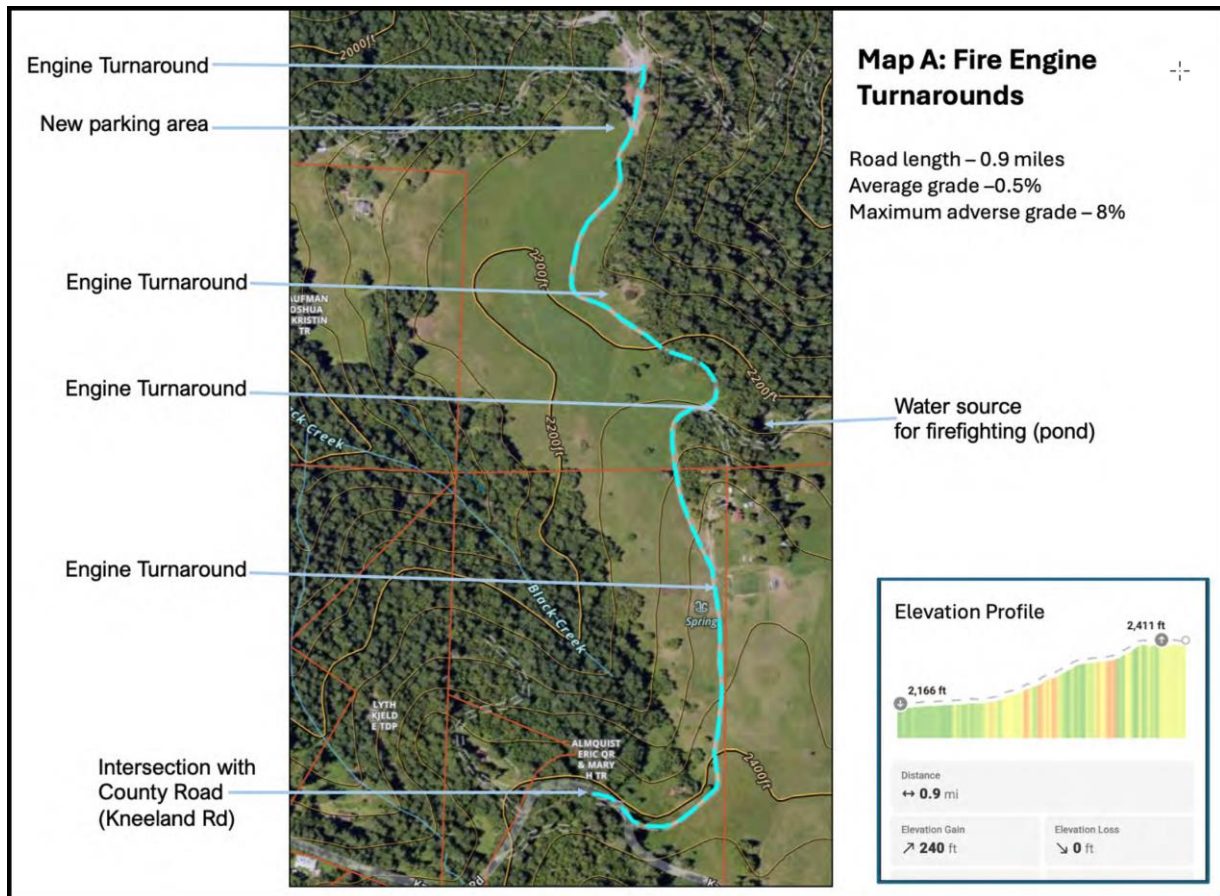


Figure 4. Private access road with fire engine turnarounds, Refer to Appendixs D and J for details.

Map B. Existing Turnouts

(existing, all intervisible, to be signed and upgraded as needed)

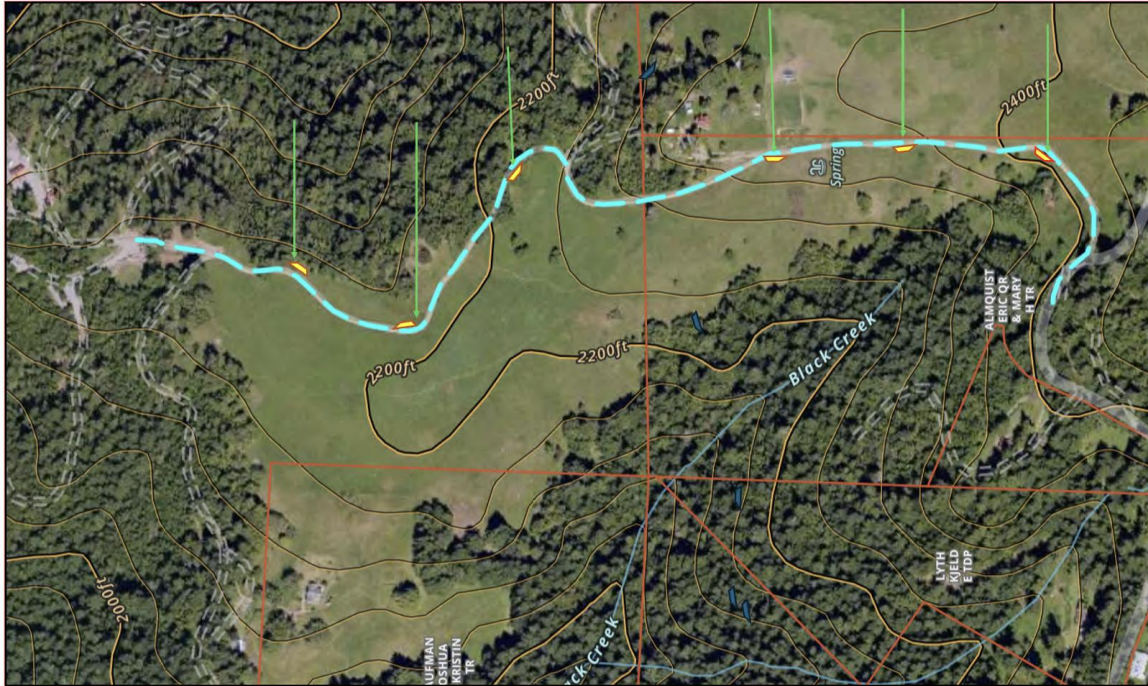


Figure 5. Private access road from Kneeland Road to the Project parking lot with existing turnouts.

Current vehicular traffic on the private access road is estimated at 12 vehicles in and out per day (365/month) and special events traffic is 0.5 per day (15/month). Project operations are expected at a maximum to require 0.7 vehicles in and out per day for burial visits, 1 vehicle in and out per day for special permission visits, and 1.3 vehicles in and out per day for burial services for a total project related increase of up to 3 vehicles per day, a 24% increase over current vehicle traffic volume. Traffic volume figures are summarized below in **Table 1** for pre-project and post-project conditions. Traffic frequency was estimated based on interviews with five similar cemeteries in the US.

Table 1. Pre and Post Project Vehicle Trips

Type of Trip	trips per day
residential/landowner	12
special event traffic	0.5
Pre-project total	12.5
burial visits	0.7
special permission visits	1.0
burial services	1.3
project trips total	3.0
Post project total	15.5
percent increase	24%

A short 50-foot-long gravel driveway will be constructed and a gravel parking lot approximately 80 by 40 feet (3,200 square feet) for 10 vehicles. A handicapped-accessible portable restroom will also be installed adjacent to the parking lot. A refillable water tank (up to 2,500 gallons) will be installed next to the Parking lot this tank will meet the CalFire specifications for a dedicated fire suppression tank. A non-residential accessory building, 1,000-1,500 square feet in size and ~30 feet tall will be built in an area approximately 400 feet west of the parking lot accessible by an ADA trail (Appendix A – Site Plan). The accessory building will be used as a memorial shelter for use by burial plot owners and their guests. A rain catchment system will be installed on the accessory building and will be plumbed to fill a 4,000-gallon water tank. This tank will be used to irrigate tree saplings in their first summer after transplanting. A network of cemetery access trails will be created and maintained simply by mowing grasses with little or no excavation.

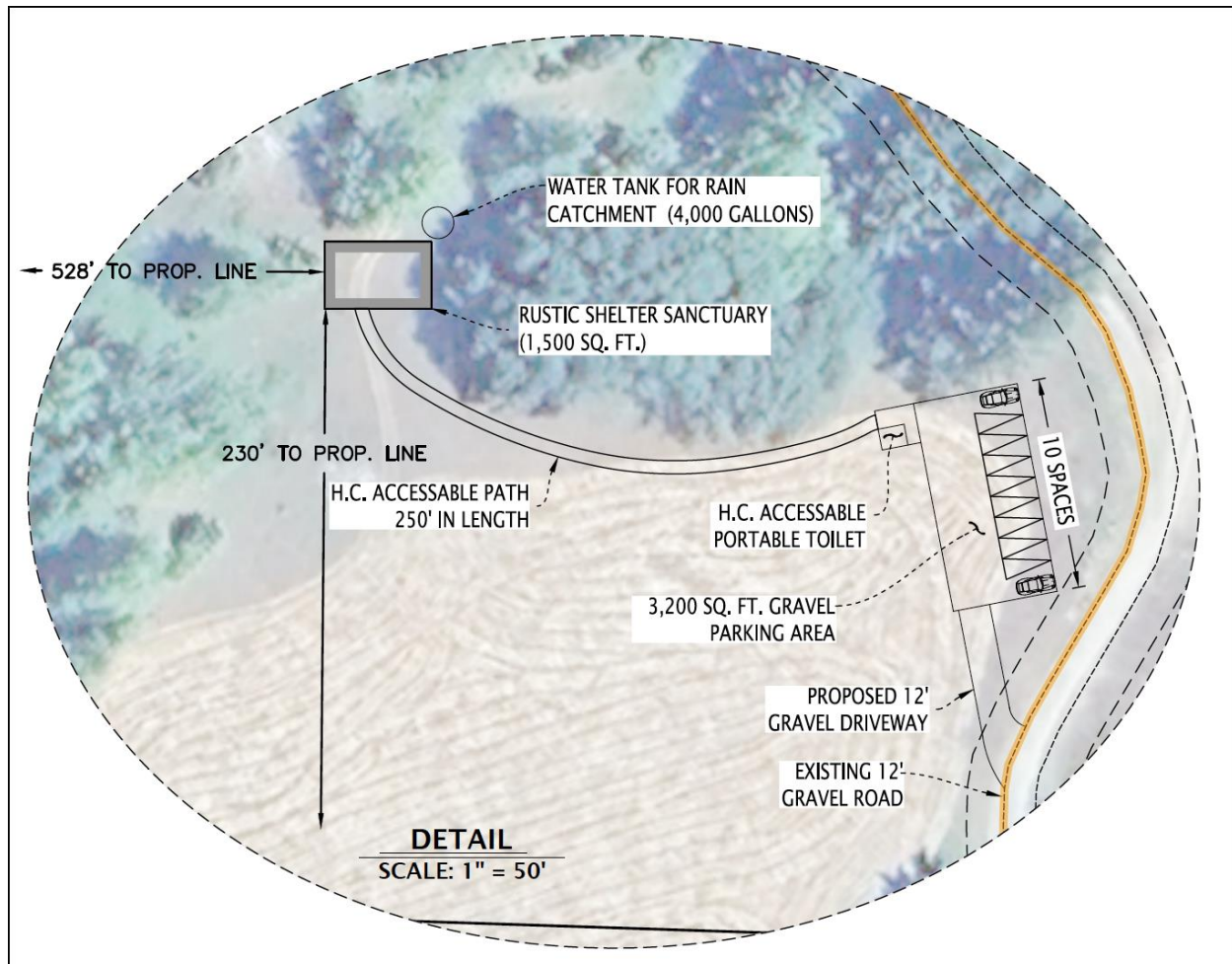


Figure 6. Project's driveway, parking lot, portable toilets, water tank, shelter pathway, and shelter accessory building sites, See Appendix A – Site Plan for scaled drawings.

A Non-commercial Timber Management Plan (NTMP), Appendix G, is in place for the Almquist Family Trust parcels, including the northern woodland portion (AP 314-131-091) of the project area. The NTMP has been approved by the California Department of Forestry and Fire Protection based on the California Forest Practice Rules. This NTMP limits the amount of timber harvest on the overall property. No timber harvest is anticipated in the project area, except for some possible removal of Douglas fir and Bay encroaching on the Oak Woodland and possible light thinning to promote forest health. Any harvesting on the site or larger property is subject to the California Forest Practice Rules and the approved NTMP.

The landowner and Sacred Groves are pursuing the designation and sale of forest carbon credits from the full ownership.

The establishment of Conservation Easement for the entire property is in progress, processed and to be held and administered by the North Coast Regional Land Trust. This will incorporate the NTMP and special provisions for the cemetery area to ensure the perpetual conservation of ecological and cemetery values.

5. Environmental Setting

The Project site covers 44.7 acres, predominantly open pasture agricultural grazing land that is utilized for hay production with annual cutting and baling for many years. The open grassland habitat extends beyond the Project area to the West and South up to and beyond Kneeland Road. The open grassland habitat is surrounded by second-growth Oak-Conifer woodlands. Figure 7.



Figure 7. Existing adjacent land uses.

Some properties approximately 0.5 miles away from the Project and to the west and east of Kneeland Road have been commercially harvested. Along Kneeland Road, approximately 0.5 miles away from the Project, there are several rural residential buildings and adjacent to the Project area are two rural residential buildings.

The nearby Kneeland Road crest and the project's access road traverse open prairie grasslands primarily used for livestock grazing surrounded by second-growth Oak-Conifer woodlands. There

are two adjacent properties that utilize the access road to the project area with open prairie grasslands that have been developed for rural Residential use. Just north of the project area is a small Animal Shelter nonprofit that also utilizes the project's access road. The project's private access road also provides access to several undeveloped parcels of Timber land to the north.

6. Other Public Agency Authorizations

The proposed Project does not require approval from any state or federal agency.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the proposed project and would involve at least one impact that is determined to be a "Potentially Significant Impact" as indicated by the checklist on the follow pages of this report.

☐	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 / Service Systems	☒	Wildfire	☐	Mandatory Findings of Significance

A detailed explanation of responses follows in this report. All answers take into account the whole action involved, including off-site as well as on-site; cumulative as well as project-level; indirect as well as direct; and construction as well as operational impacts. The explanation of each issue identifies:

- (a) the significance criteria or threshold, if any, used to evaluate each question; and

(b) the mitigation measure identified, if any, to reduce the impact to a less than significant level.

Determination:

(To be completed by the Lead Agency)

On the basis of this initial 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.

DECLARATION:

☐ 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 all 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.

Name/Title

Date

Evaluation of Environmental Impacts

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “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).
- 2) All answers must take account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analyses,” may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 9) The analysis of each issue should identify:
 - a) the significance criteria or threshold used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significant

1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant 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 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?	☐	☐	☐	☒

a) Would the project have a substantial adverse effect on a scenic vista?

Thresholds of Significance

Long-term intrusion or alteration of a scenic vista that is visible to the public.

Assessment

The project will have no impact.

The project is on private property and is not visible to the public. There are no designated scenic vistas or other resources in the area.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

Thresholds of Significance

Permanent adverse change within a State scenic highway to scenic resources' physical, vegetative, or aesthetic elements visible to the public.

Assessment

The project will have no impact.

The project is not within the viewshed of a State scenic highway. The project is not visible from any public viewsheds.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings? In nonurbanized 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 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?

Thresholds of Significance

In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?

Assessment

The project will have no impact.

The project will maintain the existing visual character of a savannah-like habitat mix of pasture and woodlands. It is on private property and is not visible to the public.

d) Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Thresholds of Significance

Long-term or permanent development that would create a new source of substantial light or glare.

Assessment

The project will have no impact.

The project does not include any uses that will include new sources of substantial light or glare. No lighting is proposed and the only development will be a small shelter which will be constructed with non-reflective building materials.

2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Potentiall y Significant Impact	Less Than Significant 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 and (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 conservation 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?	☐	☐	☒	☐

a) Would the project 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?

Thresholds of Significance

Physical changes that convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses.

Assessment

Project will have no impact.

The project is not located on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Thresholds of Significance

Implement land uses that are not allowed and conflict with existing zoning for agricultural use, or a Williamson Act contract.

Assessment

Project will have no impact.

The property is not under a Williamson Act contract. The proposed green burial is a conditionally permitted use within the Agriculture Exclusive and Timberland Production Zone zoning designations and is compatible with the intended use of these zoning districts. Existing livestock grazing and traditional haying will continue to be able to occur within the project area.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)) or timberland (as defined in PRC Section 4526)? Conflict with existing zoning for, or cause rezoning of, forestland (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))?

Thresholds of Significance

Conflict with existing zoning or result in rezoning of forest or timber land uses.

Assessment

Project will have no impact.

A portion (15 acres) of the project resides on General Plan designated Timberland. A Non-Commercial Timber Management Plan has been approved for this portion of the project. The

green burial cemetery is a conditionally permitted use in the Timberland land use area and the woodland forest, its properties and processes would be preserved, but commercial timber harvesting will not occur; no rezoning is required.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

Thresholds of Significance

Physical changes that would result in the loss of forest land or conversions of forest land to non-forest uses.

Assessment

The project will have a less than significant impact.

The project will not result in the conversion of forest land to non-forest land. Green burials within existing second-growth oak-conifer woodlands would not conflict with timberland uses or zoning, which are absent from this area. However, pursuant to a Conservation Easement, commercial harvesting of timber will not occur in the project's woodlands. In woodland areas, memorial use will be predominantly the spreading of cremains and compost. Burials may occur where forest productivity will not be adversely affected. No changes in the timberland character or productivity of the timberland are anticipated.

e) Would the project 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?

Thresholds of Significance

Physical changes which could convert farmlands to non-agricultural use or convert forest lands to non-forest use.

Assessment

The project will have a less than significant impact.

Proposed green burial activities in the agricultural grazing area will occur in plots of 500 to 1,600 square feet in size which would affect 6-30 percent of the existing grazing area. However, only a limited number of trees, 2-8 per plot, would be planted while most of the plot area would remain grassland and available for grazing and haying. The conversion of a prairie over time into an oak savannah (grassland with scattered trees) has myriad benefits to wildlife habitat, scenic beauty, carbon sequestration, and biodiversity. See Appendix I.

3. AIR QUALITY. Where available, the significant criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant 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?	☐	☐	☐	☒

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Thresholds of Significance

Project generates pollutants that would prevent attainment of the North Coast Unified Air Quality Management District's (NCUAQMD) long-term air quality objectives.

Assessment

The project will have a less than significant impact.

The project site is located within the North Coast Air Basin (NCAB), which is under the jurisdiction of the NCUAQMD. The NCAB currently meets all federal air quality standards; however, the entire air basin is currently designated as non-attainment for the state 24-hour and annual average particulate matter smaller than 10 microns in size (PM10) standards. The air basin is designated as unclassified for the state annual PM2.5 standard. Both natural and anthropogenic sources of particulate matter (including vehicle emissions, wind generated dust,

construction dust, wildfire and human caused wood smoke, and sea salts) in the NCAB have led to the PM10 non-attainment designation.

To address non-attainment for PM10, the NCUAQMD adopted a Particulate Matter Attainment Plan in 1995. This plan presents available information about the nature and causes of PM10 standard exceedances and identifies cost-effective control measures to reduce PM10 emissions to levels necessary to meet California Ambient Air Quality Standards. These rules and regulations are set forth to achieve, maintain, and protect health-based State and Federal Ambient Air Quality Standards and prevent deterioration of levels of air quality which may jeopardize human health and safety; prevent injury to plant and animal life; avoid damage to property; and preserve the comfort, convenience, and enjoyment of the natural attractions of the NCAB.

Pursuant to Air Quality Regulation 1, Chapter IV, Rule 400 – General Limitations, a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property. Visible emissions include emissions that are visible to the naked eye, such as smoke from a fire.

The project's road improvement, maintenance and construction activities are of limited scope and duration and do not involve any stationary sources of pollutants. During construction, the operation of trucks and motorized equipment will generate pollutants in the short-term such as fugitive dust (particulate matter less than 10 microns [PM10]). While the short-term operation of vehicles and diesel-powered construction equipment does release PM10 and nitrogen oxides (NOx) pollutants, these releases are not expected to result in a substantial adverse effect as all equipment will be equipped with state approved exhaust systems and maintained in good working order.

To summarize, the project would temporarily generate a very minor amount of particulate emissions over the duration of construction in the form of dust and vehicle emissions from heavy equipment. The duration of the project-related construction will be brief.

The project would not cause any long-term increase in the emissions of particulate matter or other air pollutants. To further reduce potential impacts to air quality to a level below the thresholds of significance, state law requires the construction contractor to operate in accordance with Air Quality Regulation 1 – Air Quality Control Rules, which will reduce potential fugitive dust emission impacts.

The project will not result in adverse air quality impacts including exceeding or violating an air quality plan. Based on the conclusions above and adherence to the NCUAQMD's rules and regulations, the project will not result in any significant adverse air quality impacts; therefore, impacts would be less than significant.

b) Would the project 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?

Thresholds of Significance

Production of pollutants by the project would result in a cumulatively considerable net increase in pollutants for which the NCUAQMD is in non-attainment.

Assessment

The project will have a less than significant impact.

The project involves a relatively low level of construction activity, highly limited in scope and duration. These short-term ordinary construction emissions will not result in violations or attainment plan conflicts. Day-to-day traffic associated with the project will result in some road dust during certain portions of the year. The access road to the project is maintained with regular applications of rock and the Operations Plan, Appendix B, limits cemetery visitors to a speed limit of 5 miles per hour which will be posted on the road. The project will increase the use of the road by approximately 24% but the project will not increase the sensitive receptors for dust, nor will the project create dust in proximity to existing residents. These project components will reduce the additional PM-10 emissions beyond the level of significance.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Thresholds of Significance

The project would result in a substantial increase of pollutants that can reach sensitive receptors.

Assessment

The project will have no impact.

There are no sensitive receptors including school-aged children (schools, daycare, playgrounds), and those who exercise outdoors regularly (public and private exercise facilities, parks) near the project area.

d) Would the project create objectionable odors affecting a substantial number of people?

Thresholds of Significance

The project would result in a substantial increase of objectionable odors that can reach a substantial number of people.

Assessment

The project will have no impact.

The project will not create objectionable odors that will affect a substantial number of people. Burials will be covered by at least 18" of soil, which is widely accepted as an adequate smell

barrier and prevents animal disturbance. Further, all elements of the project area are a minimum of 30 feet from property lines. The project site is a very rural location with no areas that contain a substantial number of people.

4. BIOLOGICAL RESOURCES.				
Would the project:	Potentially Significant Impact	Less Than Significant 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 or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US 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?	☐	☐	☐	☒

a) Would the project 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 or U.S. Fish and Wildlife Service?

Thresholds of Significance

Direct impacts on individuals of any protected species or species of concern or substantial adverse impacts to their habitat's functions or values.

Assessment

The project will have a less-than-significant impact on sensitive species. A 2015 botanical survey of the project area located a small (6' x 5' area) population of Siskiyou checkerbloom (*Sidalcea malvaflora ssp. Patula*) no other sensitive species were found (Appendix E). In August 2025, A California Sensitive Plant Review was conducted for the project area (Appendix F). The botanical review surveyed the area where the 2015 occurrence of Siskiyou checkerbloom was recorded. Jennifer Wheeler, botanist, inspected the reported site in consultation with the landowner on 8/11/25, and conducted a passive meander survey on 6/29/2024. No *Sidalcea* species were present during these inspections. Siskiyou checkerbloom is not listed pursuant to the Federal or State Endangered Species Acts. The California Native Plant Society has listed this species 1B.2 Rare, threatened or endangered in California and elsewhere, moderately threatened in California.

There are no sensitive wildlife species known to utilize the project area's 44.7 acres: 27.9 acres of predominately open grassland and 16.8 acres of second-growth oak-conifer woodlands. The second-growth oak-conifer woodland consists of three separate areas ranging from less than 1.5 acres, less than 4 acres and 11.5 acres. The project area is and has been actively managed for agricultural uses (grazing and hay production) and timber production under an approved NCTMP which are principally permitted uses that do disturb existing vegetation. Currently there are no known natural sensitive plant communities or wildlife habitats in the 44.7-acre project area.

A review of the California Natural Diversity Database (CNDDDB) shows that a documented occurrence of *Usnea longissima*, or Methuselah's beard lichen, was noted in 2000 248 feet west of the project area. *Usnea longissima* is not currently listed as threatened or endangered in California or federally, but it is considered a sensitive species and is on the California Rare Plant Rank 4.2 Watch List, indicating a limited distribution and a moderate level of threat within the state. The project will not impact this species because the lichen grows on trees, the project does not propose any tree cutting.

In 2004 six coast fawn lily (*Erythronium revolutum*) plants were identified on the embankment of a class II stream that is a tributary to Black Creek as part of a pre-timber harvest botanical survey. This occurrence was approximately 1,200 feet east of the project site. CNDDDB data suggest that suitable habitat for coast fawn lily (*Erythronium revolutum*) may exist on mesic sites on adjacent property to the east. To address this concern a botanical survey was conducted on August 11, 2025. Though early August is at end of the fawn lily detection period, drying leaves, if present, would likely be identifiable to genus, certainly to family. The Survey did not identify any

Erythronium revolutum in the project area, nor did the survey identify any special status plants or botanical ecosystems. *Erythronium revolutum* has no State or Federal listing status, however it is ranked as "S3" Vulnerable in the state due to a restricted range, with relatively few populations. It is unlikely that *Erythronium revolutum* will be impacted by project activities because project does not include action in the streamside management areas that the species favors.

The project area is and has been actively managed for agricultural uses (grazing and hay production) and Timber production (NTMP) which are principally permitted uses that do disturb existing vegetation. Mowing and haying is conducted on the grassland area and light grazing in the pasture and oak-woodland areas are projected to continue. The ground disturbance due to the green burials in this area will be within these actively mowed and grazed areas.

Potential Sensitive Animal Species Present

There are no sensitive wildlife species known to utilize the project area or the immediate vicinity.

According to a staff review CNDDDB records and the U.S. Fish and Wildlife Service (FWS) Inyo Butte Quad species list (FWS. 2015), given the range of habitats present, and the geographical range of the sensitive animal species, the species considered most likely to occur in the vicinity of the Site are included Sharp-shinned hawk, Golden Eagle, and Northern Spotted Owl and American Badger. None of the listed sensitive animal species below were identified onsite. While it is possible that these species may be present in the project area from time to time, project activities have been designed to minimize potential disturbance. The project does not include the cutting of trees, or the generation of ongoing noise or light. As proposed, the project has a less than significant potential to impact sensitive animal species.

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

Thresholds of Significance

A net reduction in area or ecological functions or values in riparian habitat or other sensitive natural communities.

Assessment

There will be no project impacts.

The project area is in a ridgetop and near-ridgetop location. No riparian habitat or other sensitive natural communities exist in the project area, the project has been designed with appropriate buffer distances to watercourses and wetland. The project area is and has been actively managed for agricultural uses (grazing and hay production) and Timber production (NTMP) there are no natural sensitive plant communities, confirmed by a 2025 botanical survey, Appendix F. Low density plantings of native trees will improve ecological function, biodiversity, soil health, and wildlife habitat quality. Water will be sourced from rainwater catchment.

c) Would the project have a substantial adverse effect on Federally protected wetlands as defined by [Section 404 of the Clean Water Act](#) (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Thresholds of Significance

Adversely affect wetlands or waters of the State and U.S., resulting in a net reduction of area, functions, or values.

Assessment

The project will have a less than significant impact with proposed mitigation.

An ephemeral draw (winter flow only – flow duration of 1-1.5 months per year) exists along the eastern margin of the pasture adjacent to the access road. The channel is wet only in the rainiest parts of the winter and is dry during the dry periods. To ensure that the project does not impact wetlands, the project will be conditioned to submit a Development Plan to the Planning Division for review and approval. The Development Plan Map will exclude the seasonal wetland (ephemeral channel) from project activities and from any future development.

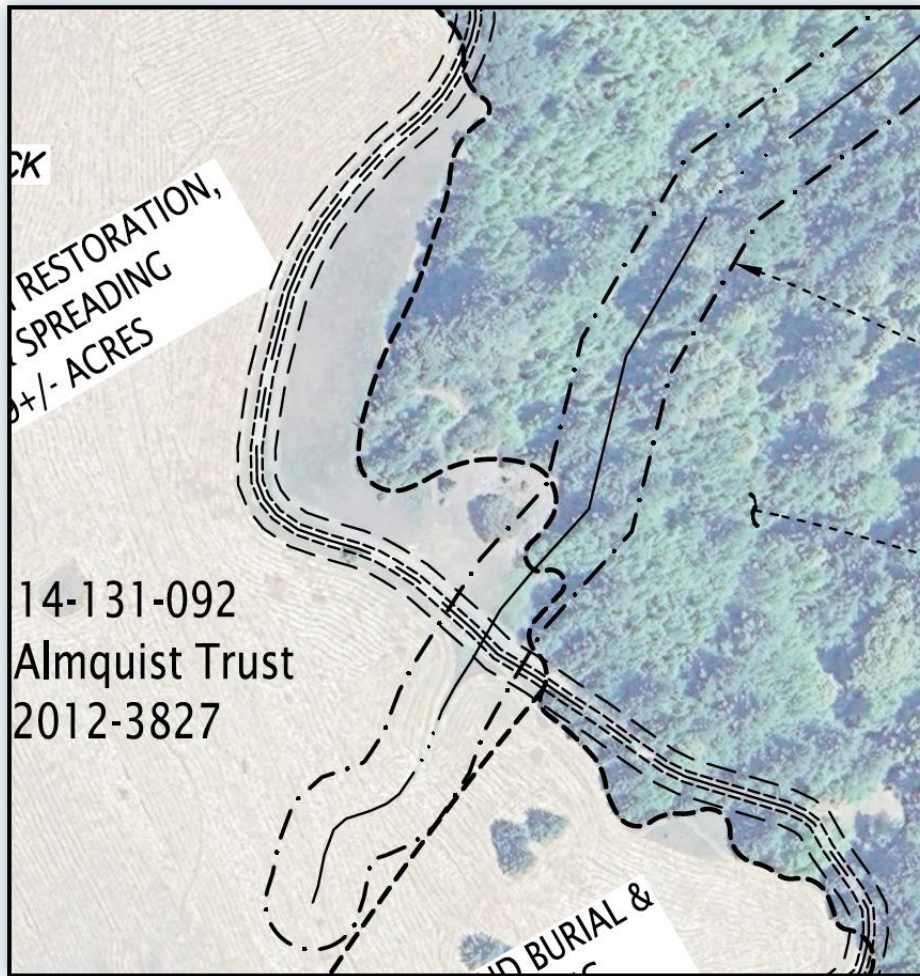


Figure 7. Location of seasonal wetland (ephemeral channel)

Mitigation Measures

1. To ensure that the project does not impact wetlands, the project will be conditioned to submit a Development Plan to the Planning Division for review and approval. The Development Plan Map will exclude the seasonal wetland (ephemeral channel) from project activities and from any future development. Once the map is reviewed and approved by the Humboldt County Planning and Building Department the applicant shall record a "Notice of Development Plan" with the Humboldt County Recorder's Office.

d) Would the project 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?

Thresholds of Significance

Long-term disruption 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. This includes physical alterations to topography, hydrology or vegetation that fragment contiguous habitat areas.

Assessment

The project will have no impact.

The project area's pasture currently produces and harvests hay. The project will enable continued hay production and grazing in the 5-acre Grassland Burial area shown in Appendix A – Site Plan. In the 22.9-acre Oak Savannah restoration area, converting grassland to oak savannah offers several ecological benefits: increased biodiversity, habitat restoration, and ecosystem services. The ecological benefits of Oak Savannah Restoration are more fully described in **Appendix – I**. Haying and grazing will continue in the Oak Savannah restoration area but will slowly decline as trees are added over the years. The establishment of green conservation burial plots will not affect wildlife use of the area because there will be no change to the area from its existing use as hay production and livestock grazing.

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

Thresholds of Significance

Conflict with a local policy or ordinance to protect biological resources.

Assessment

The project will have no impact.

Because the project will have no adverse impacts on any sensitive plant or animal species or protected or sensitive habitat areas the project does not conflict with any County Ordinances or Code Standards that protect biological resources.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

Thresholds of Significance

Obstruct or prevent the recovery of any listed species covered in an adopted [Habitat Conservation Plan](#), [Natural Community Conservation Plan](#), or other approved local, regional or state habitat conservation plan

Assessment

The project will have no impact.

The project area is predominantly (27.9 acres) open pasture actively used for hay production and grazing. A portion of the project area (16.8 acres) is second-growth (logged in the 1950s) oak-conifer woodlands. There are no mature or old growth forest habitats in the project area. There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans for the project area.

5. CULTURAL RESOURCES.				
Would the project:	Potentiall y Significant Impact	Less Than Significant 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 formal cemeteries?	☐	☒	☐	☐

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in [§ 15064.5](#)?

Thresholds of Significance

Result in physical changes in the significance of a [historical or cultural resource](#) as defined in CEQA Guidelines Section 15064.5.

Assessment

The project will have no impact.

The private access road is a portion of the Historic “Union to Trinity Trail”. Continued maintenance of the existing roadway will not introduce new impacts to the historic trail.

Several ethnogeographic and historical reviews of the project area have been prepared, the latest in 2015. These reviews do describe the Hurley Ranch historical homestead established in the early 1880s, south and east of the project area and east of the project access road as a historical resource. The historic Hurley Ranch house is located on AP 314-131-094. The project will not affect the adjacent historic property.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to [§ 15064.5](#)?

Thresholds of Significance

Result in physical changes in the significance of an archaeological resource defined in CEQA Guidelines Section 15064.5

Assessment

The project will have a less than significant impact with standard project conditions.

One cultural resource site has been identified in the project area. Based on a review of “An Archeological Survey Report for the Almquist Non-industrial Timber Management Plan Humboldt County, California” 2016 by Baldwin, Blomstrom, Wilkinson and Associates May 2016, and the Site Plan, included as Appendix A, the project does include a culturally significant resource. The 2016 Archeological Survey Report is confidential and on-file with Humboldt County Planning Department.

The standard inadvertent discovery protocol, a standard condition of approval for all projects is included in the conditions of approval for the project and the Operations Plan for the Project, Appendix B.

Standard Condition of Approval

1. If cultural resources are encountered during soil disturbing activities, the contractor on site shall cease all work in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist and the appropriate Tribal Historic Preservation Officer(s) are to be contacted to evaluate the discovery and, in consultation with the permittee and the lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, ground-stone artifacts, shellfish or faunal remains, and human burials. If human remains are found, California Health and Safety Code 7050.5 requires that the County Coroner be contacted immediately at 707-445-7242. If the Coroner determines the remains to be Native American, the Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains pursuant to Public Resources Code (PRC) Section 5097.98. Violators shall be prosecuted in accordance with PRC Section 5097.99

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Thresholds of Significance

Disturbance of human remains.

Assessment

Impacts will be less than significant with mitigation

The project area has been physically altered during historic ranch management, annual hay production and harvesting, and previous commercial timber harvesting. Human remains are not expected to be encountered. However, the standard condition of approval established in Section 5(b) will ensure that any inadvertent discovery of human remains results in an immediate cessation of work and notification of proper officials.

The project's operation plan addresses grave/burial and cremated remains scattering mapping. Passive tags that can be located and read with a reader will be placed at each grave/burial and scattering site. GPS and GIS-based mapping will be employed to accurately record each grave/burial and scattering site. Each grave/burial and scattering site will be plotted with coordinates relative to fixed reference points. A digital and physical burial register will be maintained with individual site information with maps and diagrams.

The overall property will have a resident caretaker to provide basic security for the ranch and the included cemetery. To ensure that human remains are not disturbed for the duration of the project, a mitigation measure has been added to the permit approval. Before any human remains are buried in the project area, the applicant and landowner will be required to submit a development Plan to the Humboldt County Planning and Building Department. The Development plan will specify which areas of the property are eligible for burials and which areas are not eligible for burials. Areas that are eligible for burials will not be eligible for development or ground disturbing activities besides burial. After review and approval by the planning department the development plan will be recorded with the Humboldt County Records office, this will alert future property owners to the restrictions on development associated with development plan.

Mitigation Measures

7. Require the development and recordation of a Development Plan that will restrict development on areas where graves will be placed.

8. ENERGY.				
Would the project:	Potentially Significant Impact	Less Than Significant 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?	☐	☐	☐	☒

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

Thresholds of Significance

Excessive or unnecessary consumption of energy resources.

Assessment

There will be no impact. The project will utilize some energy for the improvements to the entrance to the driveway off Kneeland Road. In addition, the construction of the 1,500 square foot non-residential multi-purpose shelter will require some energy to build. The construction of the driveway improvements is not excessive or unnecessary. The improvements will increase the safety and security of existing property owners and tenants and will increase safety for road users on Kneeland Road. The construction of the non-residential multi-purpose shelter will require some energy at construction, but that energy expenditure will be amortized over the life of the structure estimated to be over 80 years. The graves in this cemetery will be dug by hand, and watering of first year planted trees will be done using farm equipment that is in use on the property for other uses. The development and implementation of this green burial cemetery has the potential to reduce the consumption of energy resources when compared to traditional burial or cremation. The reduction of energy consumption of Green Burial compared to traditional burial or cremation is described in Appendix B – Operations Plan. Green burial's carbon footprint is 1/15 that of traditional burial and is 1/10 that of cremation.

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

Thresholds of Significance

Exceed state or local standards for renewable energy or energy efficiency?

Assessment

As stated in 6a above, the energy consumption of green burial is a fraction of traditional burial or cremation. The project is designed such that energy inputs are minimized. The gate at the entrance will utilize a battery charged by a solar panel. Graves will be dug by hand. The use of motorized equipment will be minimized and will be less than that used by the forestry and agricultural operations on the property. The use of hearses and personal vehicles for attendance of funerals will meet or exceed state or local standards for renewable energy or energy efficiency. Less than significant impact.

9. GEOLOGY AND SOILS.				
Would the project:	Potentiall y Significant Impact	Less Than Significant 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?	☐	☐	☒	☐

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- 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.
- Strong seismic ground shaking?
- Seismic-related ground failure, including liquefaction?
- Landslides?

Thresholds of Significance

Project is in a known active earthquake fault zone.

Assessment

There will be no impact.

The project is located east of the Kneeland Ridge which has been mapped as part of the Mad River Earthquake Fault Zone but is not designated an Earthquake Hazard Zone. The project is not located in a mapped Potential Liquefaction area. The project area is predominately 8% slope or less. The project is located in a Type C Hazard Zone (very dense soil and soft rock) National Earthquake Hazards Reduction Program.

The only structure proposed is a 1,500 square foot shelter/sanctuary structure that will be used for funerals and ceremonies particularly during periods of rain or other inclement weather. This structure will be constructed to building code and will be designed to withstand earthquakes and high winds. The structure will not be used for residency or commercial type occupancy, and it will resemble a picnic pavilion seen at local parks and rest areas. The proposed project will not expose people or structures to potential adverse effects, including the risk of loss, injury, or death.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Thresholds of Significance

Substantial acceleration of the rate of soil erosion at the project site or the loss of topsoil.

Assessment

No project impact.

The project will not accelerate the rate of soil erosion or result in any loss of topsoil. The soil type in the pasture and timbered areas is the Winegrass Series as mapped by NRCS Cooperative Soil Survey. Burial site suitability has been investigated over the project area. Soil texture, infiltration capacity, cover, and a gentle slope result in low erodibility, which can be confirmed by the lack of evidence of any surface or mass erosion in the project area, other than the roadway. As burials are planned at the site scale, the exact soil properties will be established by site-specific examination of soil properties, surface and groundwater presence, and sensitive plant species. Any areas that have shallow rock ledges that perch water in the rainy season will be avoided, no burials will occur unless a full, deep soil profile is present and groundwater is absent to at least 12 feet, although no groundwater table is expected in this ridgetop topographic setting. See Geology-Soils Suitability report in **Appendix H**.

c) Would the project 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?

Thresholds of Significance

Substantially de-stabilize an otherwise stable soil or geologic unit.

Assessment

The project will have no impact.

The project will not affect stability of the underlying soil, nor have any potential to initiate landslides, lateral spreading, subsidence, liquefaction or collapse. The project is located on a gently sloping ridge less than 8% slope. There are no historic landslides in the project area and there are no occurrences of liquefaction. The proposed project will not create situations that could cause the underlying geologic material to become any more unstable than it is inherently; any project impacts would be less than significant. Underlying soils are mapped as Wiregrass-Pittplace-Scaath complex and are characteristic of ridgeline soils (USDA-NCSS soil survey).

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?

Thresholds of Significance

Located on expansive soils.

Assessment

There will be no project impact.

The Project is not located on expansive soils. The project area is to remain open space as savannah like habitat of grassland and woodland.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Thresholds of Significance

Located on underlying soils that are not capable of adequately filtering wastewater or alternative waste water disposal systems.

Assessment

The Project will have no impact.

The proposed project does not include septic tanks or other alternative wastewater disposal systems, no impact related to wastewater disposal in soils would result. A handicapped-accessible portable vault restroom will be installed for use by staff, burial patrons, and visitors.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Thresholds of Significance

Destroy a unique paleontological resource or site or unique geologic feature.

Assessment

The Project will not or indirectly destroy a unique paleontological resource or site or unique geologic feature. There are no unique paleontological or geologic resources or features on the project site.

10. GREENHOUSE GAS EMISSIONS.				
Would the project:	Potentiall y Significant Impact	Less Than Significant 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?	☐	☐	☐	☒
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a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Thresholds of Significance

Substantial generation of GHG emissions due to project implementation.

Assessment

There will be no impact.

The project involves a very limited amount of one-time heavy equipment work to create a 3,200 square foot grave parking lot, a 50-foot project access driveway, and asphalt a 50-foot section of the access road at the intersection with the County's Kneeland Road. The project's estimated vehicular traffic is just 1 to 2 vehicles in and out per day, current vehicular usage is 12 vehicles in and out per day.

Further, green burials are inherently lower in carbon footprint than conventional burials or cremation.

b) Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Thresholds of Significance

Project results in a cumulatively considerable net increase in GHG emissions for which California pursuant to Assembly Bill (AB) 32 desires to reduce California's GHG emissions to 1990 levels by 2020.

Assessment

There will be no impact.

The project will involve short-term use of heavy equipment to grade and rock a 3,200-square-foot parking lot, a 50-foot project access driveway, and asphalt a 50-foot section of the access road at the intersection with the County's Kneeland Road, which will not result in a cumulatively considerable net increase in GHG emissions.

11. HAZARDS AND HAZARDOUS MATERIALS.				
Would the project:	Potentiall y Significant Impact	Less Than Significant 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?	☐	☐	☐	☒

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

Thresholds of Significance

Storage or use of large quantities of hazardous materials that could be released into the environment.

Assessment

The project will have a less than significant impact.

The project will not store or use hazardous materials. The project will involve short-term use of heavy equipment to grade and rock 3,200 square foot gravel parking lot, a 50-foot project access driveway, and asphalt a 50-foot section of the access road at the intersection with the County's Kneeland Road.

The project includes the burial of human remains that may include implants with non-biodegradable material. These materials will be in de-minimis amounts and will be effectively sequestered within the soils on the project. The project will not accept embalmed bodies for burial, nor will it accept coffins, caskets, or shrouds that are not composed of natural materials that are fully and readily biodegradable and will not emplace any vaults or grave liners.

b) Would the project 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?

Thresholds of Significance

Project involves the use of large quantities of hazardous materials.

Assessment

The project will have no impact.

The project will not store or use hazardous materials. As described in Appendix B – Operations Plan, the project will not accept embalmed bodies for burial, nor will it accept coffins, caskets, or shrouds that are not composed of natural materials that are fully and readily biodegradable and will not emplace any vaults or grave liners. The project will involve short-term use of heavy equipment to grade and rock 3,200 square foot gravel parking lot, a 50-foot project access driveway, and asphalt a 50-foot section of the access road at the intersection with the County's Kneeland Road.

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

Thresholds of Significance

Project is located within 1/4 of mile of a school and involves the use of large quantities of hazardous materials.

Assessment

The project will have no impact.

There are no schools located within 1/4 mile of the project site.

d) Would the project 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?

Thresholds of Significance

The project is located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Assessment

The project will have no impact.

The project is not located on a site which is included on a list of hazardous materials. The project site is not included on the list of Hazardous Waste and Substances Sites compiled by the California Environmental Protection Agency, including the Cortese List, Envirostor, or the California State Water Quality Control Board's Geotracker website. There are not active or historic cleanup sites within or near the project area.

e) If applicable, would the project be 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 for people residing or working in the project area?

Thresholds of Significance

Project is 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.

Assessment

The project will have no impact.

The project is not located within two miles of a public airport or public use airport.

f) Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Thresholds of Significance

Project would prevent alerting and warning citizens, conducting evacuations, short-term feeding and sheltering, conducting search and rescue operations or using emergency evacuation routes.

Assessment

The project will have no impact. There are no emergency response or evacuation plans that encompass the project site.

g) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized area or where residences are intermixed with wildlands?

Thresholds of Significance

Project is in an area shown on a map used to identify wildland fire hazard areas. Potential exists for a significant risk of loss, injury or death involving wildland fires.

Assessment

The project will have no impact.

The project is in the Kneeland Fire Protection District in an area that Cal Fire has rated as a State Responsible Area, with a High Fire Hazard Severity rating. according to the Humboldt County GIS portal. In general, during the fire season people visiting the Kneeland Road area and project could be exposed to a significant risk or loss, injury or death involving wildland fires. The project and its green burial activities will not create a significant fire hazard.

12. HYDROLOGY AND WATER QUALITY.				
Would the project:	Potentially Significant Impact	Less Than Significant 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 that 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?	☐	☐	☐	☒
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a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Thresholds of Significance

Exceed any state water quality standards or waste discharge requirements

Assessment

The project will have no impact.

Following the principles of natural-green burial the project will not accept embalmed bodies (with case-by-case consideration of nontoxic embalming), coffins, caskets, or shrouds that are not composed of natural materials that are fully and readily biodegradable and will not emplace any vaults or grave liners.

Decomposition of dead bodies does not introduce pathogens, and it does not release polluting agents into soil or water under average circumstances in a cemetery. Soil is comprised of living organisms that can decompose organic matter. The soil environment functions as a highly effective natural filter and biological reactor that contains, attenuates, and rapidly neutralizes human-borne pathogens. The combination of physical filtration, chemical adsorption, and overwhelming microbial antagonism within the soil matrix ensures that decomposition occurs safely and locally. The primary mechanism preventing the offsite transport of microorganisms is the physical structure of the soil itself. Suitable soils for burial are present on the proposed site, based on survey and analysis by a professional soil scientist and green burial expert. Beyond its physical properties, in-situ soil is a living, biologically active ecosystem. The native microbial community within a healthy soil is the most critical factor in neutralizing pathogens from a decomposing body. In essence, the soil does not act as a passive storage medium but as an active, aggressive, and highly efficient biological treatment system.

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

Thresholds of Significance

Substantially deplete groundwater supplies or interfere with groundwater recharge or lowering of the local groundwater table.

Assessment

The project will have no impact.

The project will not affect groundwater supplies or interfere with groundwater recharge or lower the local groundwater table. Water to be used for watering first year plantings of trees will be provided by rainwater catchment stored in a 4,000-gallon tank.

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?**

Thresholds of Significance

Substantially alter existing drainage, or the addition of impervious surfaces.

Assessment

The project will have no impact.

The project's green burials have a very small footprint, and the disturbance footprint is immediately vegetated. Other than the grading for the project's shelter building, driveway, and parking lot, the project area, including access trails, will be fully vegetated. There are no stream channels on the project area. There are several seeps along the road during especially wet conditions, and a short ephemeral draw that is not flow-connected to any other streams. There is no hydrologic connectivity between the project area or the road to the mapped stream (Black Creek) below the project area. A 100' radial setback at the southwest corner of the project will be applied to ensure no impacts to Black Creek. Black Creek is outside the project area and no surface waters from the project area flow to Black Creek or any other tributary of the Mad River.

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

Thresholds of Significance

Located in a flood hazard, tsunami, or seiche zones.

Assessment

The project will have no impact.

The project is not located in any flood hazard zone

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

Thresholds of Significance

Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Assessment

The project will have no impact.

The project will not affect surface or groundwater quality. Decomposition of dead bodies does not introduce pathogens and it does not release polluting agents into soil or water under average circumstances in a cemetery. Soil is comprised of living organisms that can decompose organic matter. The soil environment functions as a highly effective natural filter and biological reactor that contains, attenuates, and rapidly neutralizes human-borne pathogens. The combination of physical filtration, chemical adsorption, and overwhelming microbial antagonism within the soil matrix ensures that decomposition occurs safely and locally. The primary mechanism preventing the offsite transport of microorganisms is the physical structure of the soil itself. Suitable soils for burial are present on the proposed site, based on survey and analysis by a professional soil scientist and green burial expert. Beyond its physical properties, in-situ soil is a living, biologically active ecosystem. The native microbial community within a healthy soil is the most critical factor in neutralizing pathogens from a decomposing body. In essence, the soil does not act as a passive storage medium but as an active, aggressive, and highly efficient biological treatment system.

13. LAND USE AND PLANNING.				
Would the project:	Potentially Significant Impact	Less Than Significant 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?	☐	☐	☒	☐

a) Would the project physically divide an established community?

Thresholds of Significance

Physically divide an established community.

Assessment

The project will have no impact.

The project will not create any physical barriers, open pasture and woodland habitats will be retained so there will be no visual or physical barriers resulting from the project.

b) Would the project 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?

Thresholds of Significance

Result in a significant environmental impact due to a failure to comply with applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for avoiding or mitigating an environmental effect.

Assessment

The Project will have a less than significant impact.

The project will comply with the County's General Plan Designations and Policies. It is in the County's Agriculture, Grazing, and Timber land use areas. A cemetery, while not a principally permitted use, is a conditionally permitted use in these areas. The Sacred Groves project is a low-density green burial cemetery that has minimal environmental impact in contrast to a conventional high-density cemetery.

14. MINERAL RESOURCES.				
Would the project:	Potentially Significant Impact	Less Than Significant 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?	☐	☐	☐	☒
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a) Would the project 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?

Thresholds of Significance

Development of land overlying a mineral resource that would physically preclude future access to that resource.

Assessment

The project will have no impact.

There are no known commercial mineral resources in the project area. The main resource in the area is the soil as used in place for the growing of grass and trees and other plants. The project does not result in the loss of this resource.

b) Would the project 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?

Thresholds of Significance

Loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Assessment

The project will have no impact, as no such delineation exists for the project area.

15. NOISE.				
Would the project:	Potentially Significant Impact	Less Than Significant 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 groundborne vibration or groundborne 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?	☐	☐	☐	☒

a) Would the project generate 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?

Thresholds of Significance

Generating noise and exposing people to noise more than 55 dBA as established in the County noise standards, or applicable standards of other agencies.

Assessment

Less than significant impact.

The project will not generate substantial temporary or permanent increase in ambient noise levels in the vicinity of the project. The construction of the Shelter/Sanctuary building and grading of the driveway and parking area will generate temporal noise, however this construction will occur 940 feet away from the nearest residence. The grading and construction of the gate and driveway apron will also generate temporal noise, however that noise will occur adjacent to

a county road where vehicle noise is expected and ongoing. The nearest receptors for this noise in the project are 1,300 feet to the west along Kneeland Road. The Operations Plan indicates that amplified music will not be allowed at the cemetery.

b) Would the project generate excessive ground borne vibration or ground borne noise levels?

Thresholds of Significance

Generate excessive ground borne vibration or noise levels.

Assessment

The project will have no impact.

Project's permitted short-term construction activities do not include construction techniques that involve ground borne vibrations.

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?

Thresholds of Significance

Expose people to excessive noise levels within the vicinity of a public airport. The project will have no impact. The project is not within 2.0 miles of any private airport.

Assessment

The project will have no impact.

The project is not located in the vicinity of any airport.

16. POPULATION AND HOUSING.					
Would the project:	Potentiall y Significan t Impact	Less Significant Mitigation Incorporated	Than with	Less Than Significan t 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?	☐	☐		☐	☒

a) Would the project induce substantial population growth in an area, either directly (e.g., by proposing new homes and/or businesses) or indirectly (e.g., through extension of roads or other infrastructure)?

Thresholds of Significance

Result in substantial population growth in the area.

Assessment

The project will have no impact. The project involves green burials in sacred groves.

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

Thresholds of Significance

Displace significant housing units in the area.

Assessment

The project will have no impact.

The project involves green burials in pasture and woodlands. The project will not displace any existing housing.

17. PUBLIC SERVICES.

a) 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Fire protection?	☐	☐	☐	☒
ii. Police protection?	☐	☐	☐	☒
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

Thresholds of Significance

Result in increased need for public services such as fire and police protection, schools, and parks.

Assessment

The project will have no impact.

The project will not result in any new structures or use that will result in the need for additional public services, including fire protection, police protection,

18. RECREATION.				
Would the project:	Potentially Significant Impact	Less Than Significant 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?	☐	☐	☐	☒

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?

Thresholds of Significance

Increased use of parks or other recreational facilities in the area resulting in substantial deterioration of facilities.

Assessment

The project will have no impact. No recreational facilities will be used for this project and the project will not add any additional population to the area.

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

Thresholds of Significance

Include or require the construction or expansion of recreational facilities in the area. Which might have an adverse physical effect on the environment.

Assessment

The project will have no impact.

The project does not include the construction or expansion of any recreational facilities.

19. TRANSPORTATION.				
Would the project:	Potentiall y Significant Impact	Less Than Significant 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)? * Criteria for Analyzing Transportation Impacts, effective July 1, 2020	☐	☐	☒	☐
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?	☐	☐	☐	☒

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

Thresholds of Significance

Substantial increase in the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections.

Assessment

The project will have a less than significant impact.

Humboldt County does not have applicable transportation standards. The project will have a minor increase in the number of vehicle trips per day (3) over existing traffic volumes per day (13).

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Thresholds of Significance

Vehicle miles traveled exceed local or state-wide standards.

Assessment

In *The Technical Advisory on Evaluating Transportation Impacts in CEQA, Governor's Office of Planning and Research, 2018*, specific thresholds for determining the significance of transportation impacts based on Vehicle Miles Traveled (VMT) are set. The technical advisory from the Office of Planning and Research determined that projects generating fewer than 110 trips per day may be screened out from performing a detailed VMT analysis. The proposed project estimates the project associated trip increase is 3 trips per day, well under the threshold of significance.

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

Thresholds of Significance

Substantially increase hazards due to transportation design features or incompatible uses.

Assessment

The project will have no impact.

The project will slightly increase private traffic on the one-way gravel access road. It will also grade 5 existing roadway turnout areas and install a 50-foot asphalt connection at the intersection with the County Road. These improvements will decrease any hazards associated with the roadway below a level of significance, and will increase safety for existing road users.

d) Would the project result in inadequate emergency access?

Thresholds of Significance

Result in inadequate emergency access.

Assessment

The project will have no impact.

The project's use of the private access road will not impair emergency access to the project site or adjacent property. There will be very limited traffic to the site and there are adequate turnouts to allow for vehicle traffic to allow for emergency vehicles to safely pass.

20. TRIBAL CULTURAL RESOURCES.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resource Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resource Code section 5020.1(k), or	☐	☒	☐	☐
ii) 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 Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

ii) 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 Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Threshold of significance

Adversely alter tribal cultural resources.

Assessment

The project will have a less than significant impact with mitigation and the standard inadvertent discovery protocol as a condition of approval.

The Tribal Historic Preservation Officer of the Bear River Rancheria (Wiyot tribe) reviewed previous archaeological and cultural surveys of the project and adjacent areas and conducted a site visit. The THPO site visit concluded that the inadvertent discovery protocol would be sufficient to address tribal concerns.

Public Resources Code section 21074 defines tribal cultural resources and includes sites, features, places, cultural landscapes, sacred places, and object with cultural values to a California Native American Tribes. Tribal cultural resources are cultural resources that may be eligible for listing in the California Register of Historic Resources or similar registers or is determined eligible by the lead agency.

The County sent out requests for official intergovernmental consultation, per AB 52 and SB 18, in May of 2025. Requests were sent to the Wiyot Tribe, the Hoopa Tribe, the Bear River Band of the Rohnerville Rancheria, the Blue Lake Rancheria, and the Cher-Ae Heights Indian Community of the Trinidad Rancheria. No responses were received. Consultation letters were sent to all previously referred Tribal governments.

One tribal cultural resource site has been identified (April 2000) in the project area. To ensure that the project does not impact the cultural resource, the project will be conditioned to submit a Development Plan to the Planning Division for review and approval. The Development Plan Map will exclude culturally sensitive areas from project activities and will exclude the project area, burial grounds, from any future development not specifically authorized by the Conditional Use Permit as described in Appendix A- Site Plan. Once the map is reviewed and approved by the Humboldt County Planning and Building Department the applicant shall record a "Notice of Development Plan" with the Humboldt County Recorder's Office.

Several other tribal cultural resource sites adjacent to the project area but outside of the project area have also been identified. These sites will not be affected by project activities.

An inadvertent discovery protocol will be added to the project as a standard condition of approval. This standard condition will prevent inadvertent impacts to cultural resources when graves are dug for the project.

Mitigation Measures

1. To ensure that the project does not impact cultural resources, the project will be conditioned to submit a Development Plan to the Planning Division for review and approval. The Development Plan Map will exclude Culturally sensitive areas from project activities and will exclude the project area, burial grounds, from any future development not specifically authorized by the Conditional Use Permit and described in Appendix A- Site Plan. Once the map is reviewed and approved by the

Humboldt County Planning and Building Department the applicant shall record a "Notice of Development Plan" with the Humboldt County Recorder's Office.

2. If cultural resources are encountered during soil disturbing activities, the contractor on site shall cease all work in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist and the appropriate Tribal Historic Preservation Officer(s) are to be contacted to evaluate the discovery and, in consultation with the permittee and the lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, ground-stone artifacts, shellfish or faunal remains, and human burials. If human remains are found, California Health and Safety Code 7050.5 requires that the County Coroner be contacted immediately at 707-445-7242. If the Coroner determines the remains to be Native American, the Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains pursuant to Public Resources Code (PRC) Section 5097.98. Violators shall be prosecuted in accordance with PRC Section 5097.99

21. UTILITIES AND SERVICE SYSTEMS.				
Would the project:	Potentiall y Significant Impact	Less Than Significant 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?	☐	☐	☐	☒

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?

Thresholds of Significance

Require relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities.

Assessment

The project will have no impact.

The project will utilize onsite utilities such as a ADA portable toilet facilities that will be installed at the project's parking lot.

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

Thresholds of Significance

Require or result in a substantial demand for new water supplies

Assessment

The project will have no impact.

The project will utilize onsite rain catchment system that will fill a 4,000-gallon tank adjacent to the accessory non-residential building and 2,500-gallon fire suppression water tank that will be filled as needed by a water truck. The project will only water new plantings of individual tree seedlings at burial plots from the time of planting until the first rains, possibly 4-6 months.

At a burial rate of one a week, assuming this is in a new plot with four trees being planted that would require 80 gallons of water per watering at 20 gallons per tree. At 80 gallons per week a total of 320 gallons per month would be needed. If watering were to occur twice per six-month dry season, then a second watering three months into the dry season would require 160 gallons a week for a total of 640 gallons a month for the last three months. A total of 2,880 gallons might be required for the entire six-month dry season. A quad runner with a trailer could be used to bring in 80 gallons for each plot. Water will be stored in a 4,000-gallon water tank at the parking lot.

c) Result in a determination by the waste water 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?

Thresholds of Significance

Exceed capacity of wastewater provider to serve the project.

Assessment

The project will have no impact.

The project will not require wastewater services.

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

Thresholds of Significance

Generate solid waste in excess of local solid waste infrastructure capacity.

Assessment

The project will have no impact.

The project will not generate solid waste.

Human implants are not toxic as they are placed in human bodies. Metals like titanium and nickel found in artificial knees and hips are very strongly held in soil and are not mobile and do not pose any environmental hazard or health risks when buried in soil.

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

Thresholds of Significance

Violate any regulations related to solid waste.

Assessment

The project will have no impact.

The project will not affect solid waste disposal in this area. The Cemetery's Operations Plan will describe and institute a "Pack it in, Pack it out" policy for solid waste associated with ceremonies and visitors. The Operations Plan also included a post event inspection process to ensure that solid waste is removed from the site after each use.

22. WILDFIRE.				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant 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?	☐	☐	☐	☒

The project is located in the Kneeland Fire Protection District in an area that Cal Fire has rated as a State Responsible Area, with a High Fire Hazard Severity rating. According to the Humboldt County GIS portal.

a) Substantially impair an adopted emergency response plan or emergency evacuation plans.

Thresholds of Significance

Conflict with an adopted emergency response plan or emergency evacuation plan.

Assessment

The project will have no impact.

The project is located on private property, and there are no emergency response plans or emergency evacuation plans. Emergency egress is provided by the road, to the South to Kneeland Road and to the North via passable timber haul roads. A permitted pond exists to the East of the project site and is accessible to engines for water drafting.

A 2,500 gallon SRA water storage tank will be installed.

All state-required clearing setbacks will be employed at the Sanctuary building and portable facilities.

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??

Thresholds of Significance

Expose project occupants to wildfire risks.

Assessment

The project will have a less than significant impact.

In general, during the fire season people visiting the Kneeland Road and Kneeland area and the project could be exposed to a significant risk or loss, injury or death involving wildland fires. The project and its green burial activities will not create a fire hazard nor attract many people (3 cars per day). Wildfire risk is not expected to differ because of the proposed project.

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.

Thresholds of Significance

Installation or maintenance of associated infrastructure that may exacerbate fire risks.

Assessment

The project will have no impact.

The project will not require new associated infrastructure.

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?

Thresholds of Significance

Increase risks of downslope or downstream flooding or landslides.

Assessment

The project will have no impact.

The project is located on a relatively level (less than 8% slope) ridge, has no surface runoff connected to streams, and will not disturb large areas or reduce vegetative cover, nor induce runoff or change existing overland flow or subsurface drainage. Downslope flooding or landslide risk is not expected to differ as a result of the proposed project.

23. MANDATORY FINDINGS OF SIGNIFICANCE.				
	Potentially Significant Impact	Less Than Significant 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?	☐	☐	☒	☐

The proposed Sacred Groves Green Burial Cemetery project will 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, or 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 described in the biological resources section above, the proposed modifications to the project are not expected to have any significant impact on biological resources. The above responses also suggest the project will not have any impacts which have the potential to significantly degrade the quality of the environment. And the Cultural Resources section describes that the project will not have any potentially significant impact on historical resources.

The proposed project also will not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

a) Does the project have the potential to 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?

Thresholds of Significance

Project has impacts associated with any of the environmental topics identified in the Initial Study (Appendix G CEQA Guidelines) that cannot be mitigated to less than significant levels.

Assessment

The project will have a less than significant impact with the successful implementation of mitigation measures.

As discussed herein under Section 2 Agriculture and Forestry Resources, Section 3 Air Quality, Section 4 Biological Resources, Section 5 Cultural Resources, Section 11 Land Use/Planning, Section 18 Tribal Cultural Resources, and Section 20 Wildfire, the project, with the successful implementation of mitigation measures, does not have the potential to 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, impair water quality, 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).

Thresholds of Significance

The incremental effects of a project are cumulatively considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

Assessment

The project will have less than significant impacts with the implementation of mitigation measures.

A cumulative impact is when the incremental effects of the project, when combined with the effects of other past, present and reasonably foreseeable future projects, are cumulatively considerable.

As reported throughout this document, Section 2 Agriculture and Forestry Resources, Section 3 Air Quality, Section 4 Biological Resources, Section 5 Cultural Resources, Section 11 Land Use/Planning, Section 18 Tribal Cultural Resources, and Section 20 Wildfire, in this initial study any potential significant impacts caused by this project will be mitigated to the less-than-significant level with the successful implementation of mitigation measures.

The project does not have adverse impacts that are individually limited, but cumulatively considerable.

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

Thresholds of Significance

The project will have environmental impacts that cause substantial adverse effects on human beings, either directly or indirectly.

Assessment

The project will have less than significant impacts that will not directly affect people with the successful implementation of mitigation measures.

The project's environmental impacts that may adversely affect people have been determined to be less than significant with successful implementation of mitigation measures. As discussed herein, the project is not expected to cause any substantial adverse environmental effects that will cause harm to human beings either directly or indirectly.

MITIGATION MEASURES, MONITORING, AND REPORTING PROGRAM

The Department found that the project could result in potentially significant adverse impacts unless mitigation measures are required. A list of mitigation that addresses and mitigates potentially significant adverse impacts to a level of non-significance follows.

Mitigation measures were incorporated into the conditions of project approval. The following is a list of these measures and a verification form to ensure measures shall be met.

1. Biological Resources:

Mitigation Measure BIO-1: To ensure that the project does not impact wetlands, the project will be conditioned to submit a Development Plan to the Planning Division for review and approval. The Development Plan Map will exclude the seasonal wetland (ephemeral channel) from project activities and from any future development. Once the map is reviewed and approved by the Humboldt County Planning and Building Department the applicant shall record a "Notice of Development Plan" with the Humboldt County Recorder's Office.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
Prior to the commencement of project activities or the issuance of a building permit	Applicant	Humboldt County Planning and Building Department	Recorded document		

2. Cultural Resources

Mitigation Measure CUL-1: To ensure that the project does not impact cultural resources, the project will be conditioned to submit a Development Plan to the Planning Division for review and approval. The Development Plan Map will exclude Culturally sensitive areas from project activities and will exclude the project area, burial grounds, from any future development not specifically authorized by the Conditional Use Permit and described in Appendix A- Site Plan. Once the map is reviewed and approved by the Humboldt County Planning and Building Department the applicant shall record a "Notice of Development Plan" with the Humboldt County Recorder's Office.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
Prior to the commencement of project activities or the issuance of a building permit	Applicant	Humboldt County Planning and Building Department	Recorded document		

Standard Condition of Approval CUL-2: If cultural resources are encountered during soil disturbing activities, the contractor on site shall cease all work in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist and the appropriate Tribal Historic Preservation Officer(s) are to be contacted to evaluate the discovery and, in consultation with the permittee and the lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, ground-stone artifacts, shellfish or faunal remains, and human burials. If human remains are found, California Health and Safety Code 7050.5 requires that the County Coroner be contacted immediately at 707-445-7242. If the Coroner determines the remains to be Native American, the Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains pursuant to Public Resources Code (PRC) Section 5097.98. Violators shall be prosecuted in accordance with PRC Section 5097.99

3. Tribal Cultural Resources

Mitigation Measure TCUL-1: To ensure that the project does not impact cultural resources, the project will be conditioned to submit a Development Plan to the Planning Division for review and approval. The Development Plan Map will exclude Culturally sensitive areas from project activities and will exclude the project area, burial grounds, from any future development not specifically authorized by the Conditional Use Permit and described in Appendix A- Site Plan. Once the map is reviewed and approved by the Humboldt County Planning and Building Department the applicant shall record a "Notice of Development Plan" with the Humboldt County Recorder's Office.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
Prior to the commencement of project activities or the issuance of a building permit	Applicant	Humboldt County Planning and Building Department	Recorded document		

Standard Condition of Approval TCUL-2: If cultural resources are encountered during soil disturbing activities, the contractor on site shall cease all work in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist and the appropriate Tribal Historic Preservation Officer(s) are to be contacted to evaluate the discovery and, in consultation with the permittee and the lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, ground-stone artifacts, shellfish or faunal remains, and human burials. If human remains are found, California Health and Safety Code 7050.5 requires that the County Coroner be contacted immediately at 707-445-7242. If the Coroner determines the remains to be Native American, the Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains pursuant to Public Resources Code (PRC) Section 5097.98. Violators shall be prosecuted in accordance with PRC Section 5097.99

APPENDICES

- A. Sacred Groves Keeland Cemetery- Site Plan
- B. Sacred Groves Keeland Cemetery – Operations Plan
- C. 2025 Humboldt County Public Works comment letter regarding road improvements.
- D. Sacred Groves Conservation Green Burial Cemetery- Private Access Road Study
- E. 2015 Biological Study of project area
- F. California Sensitive Plant Review for Sacred Groves project area, Wheeler 2025.
- G. Non-Commercial Timber Management Plan (NTMP) for the Almquist Family Trust
- H. Geology and Soils Suitability Report
- I. Biological benefits of Oak savannah conversion
- J. Fire Safe Road Requirements Checklist