Initial Study and Proposed Mitigated Negative Declaration

For

Repair of Damaged Lawful Non-Conforming Billboard Structure

California Environmental Quality Act (CEQA)

August 11, 2020

Lead Agency:
Humboldt County
3015 H St.
Eureka, CA 95501

Lead Agency Contact:
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List of Acronyms

CARB	California Air Resources Board
HSU	Humboldt State University
CEQA	California Environmental Quality Act
BMP's	Best Management Practices
EIR	Environmental Impact Report
GHG	Greenhouse Gas
ESHA	Environmentally Sensitive Habitat Areas
CalTrans	California Department of Transportation
IS	Initial Study
NPDES	National Pollutant Discharge Elimination System
ODA	Outdoor Advertising Act
CalTrans ODA	CalTrans Office of Outdoor Advertising
HBAP	Humboldt Bay Area Plan
CCC	California Coastal Commission
SLC	State Lands Commission
HBHRCD	Humboldt Bay Harbor, Recreation, and Conservation District
PTR	Public Trust Resource

1. Project Summary

Date:	July 30, 2020
Project Title:	Repair of Damaged Lawful Non-Conforming Billboard Structure
Project Summary:	The proposed project would permit the repair and re-erection of a legal nonconforming billboard structure damaged during a winter storm in November 2019
Project Sponsor:	Allpoints Outdoor Inc. c/o Geoffrey Wills 60 E Ridge Lane McKinleyville, CA 95519 (714)655-0763
Lead Agency:	Humboldt County
Lead Agency Contact:	Lead Agency Contact: Steve Lazar, Senior Planner (707)268-3741 slazar@co.humboldt.ca.us 3015 H St. Eureka, CA 95501
Report Author:	Steven Lazar, Senior Planner, Humboldt County Planning & Building Department
Project Location:	Highway 101, post mile 74.23 R Latitude:40.7505 Longitude: -124.1931 The project site is located between US 101 and the Elk River, south of the City of Eureka, on the east side of Highway 101, approximately ½-mile south of the intersection of Herrick Ave and US Highway 101.
Coastal Zone:	The billboard is located on lands within the Coastal Zone where the California Coastal Commission retains jurisdiction over coastal development activities. Separate review is being performed by that agency.
Affected Parcels:	Assessor's Parcel Numbers (APNs): 305-031-007, 305-031-008, and 305-031-009
General Plan Designation:	Agriculture Exclusive (AE)

Zoning:	Agriculture Exclusive (AE)
Other Permits and Approvals required	1) Adoption of Mitigated Negative Declaration (MND) 2) Approval of Special Permit 3) CalTrans 4) California Coastal Commission
Tribal Consultation	At this time, no requests for Tribal Consultation (pursuant to Public Resources Code section 21080.3.1) have been received.

1.1. CEQA Requirement:

The project involves an application for a Special Permit to authorize repair and reconstruction of a wooden billboard structure that was damaged during a winter storm event on November 26, 2019. Severe winds from the storm caused a number of the vertical supporting posts to snap, resulting in the collapse of the billboard.

The project proposes to erect the billboard by reconstruction in its current location. The billboard is considered a legal nonconforming structure and use, and reconstruction is subject to approval of a Special Permit, which may be considered a "discretionary action" and "discretionary project" pursuant to Section 15002(i) and Section 15357 of the CEQA Guidelines, respectively. CEQA encourages lead agencies and applicants to modify their projects to avoid potentially significant adverse impacts (CEQA Section 20180 [C] [2] and State CEQA Guidelines Section 15070[b] [2]). The project design and conditions of approval incorporate a number of mitigation measures designed to avoid or minimize potential adverse effects from the activities necessary to re-erect the structure.

The Lead Agency for the proposed project is the County of Humboldt, per CEQA Guidelines Section 21067. Compliance with CEQA is being performed by the Humboldt County Planning & Building Department in tandem with processing of the Special Permit request. The purpose of this Initial Study (IS) is to provide a basis for determining whether to prepare an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration. This is intended to satisfy the requirements of CEQA (Public Resources Code, Div 13, Sec 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387).

Section 15063(d) of the State CEQA Guidelines states that an IS shall contain the following information in brief form:

1) A description of the project including the location of the project

2) An identification of the environmental setting

3) An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to provide evidence to support the entries

4) Discussion of means to mitigate identified significant effects, if any

5) An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls

6) The name of the person or persons who prepared and/or participated in the Initial Study

The environmental checklist form contained in this document is based on Appendix G of the CEQA Guidelines (2020).

2. Project Description

2.1. Project Location

The property is located in the Spruce Point area southeast of Eureka city limits, within the unincorporated portion of Humboldt County. The parcel is comprised of a narrow strip of land situated east of State Highway 101 and west of the lower reaches of the Elk River. The parcel has hosted billboards since at least 1955 and is currently developed with three (3) billboard structures which face northbound traffic.

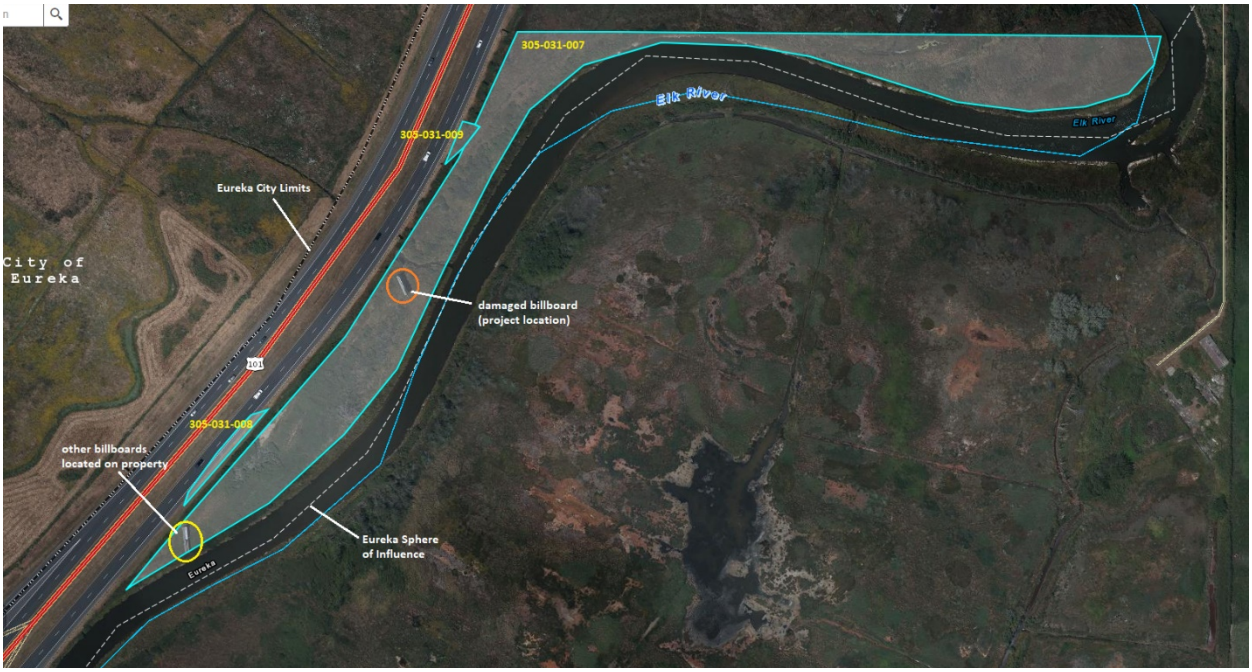

Figure 1:Vicinity Map –2019 aerial photo showing the parcel boundaries, city limits, and billboard location(s)

The project site is located within higher ground west of the natural channel of the nearby Elk River. Mapping from the National Wetland Inventory denotes the project site to be within a freshwater emergent wetland. A tidal arm of the Elk River crosses under highway 101 approximately 20 feet north of the sign location. Approximately one third of a mile north of the sign location lies the highway bridge crossing the Elk River. A quarter mile south lies the northbound highway onramp associated with the lower reaches of Humboldt Hill Road.

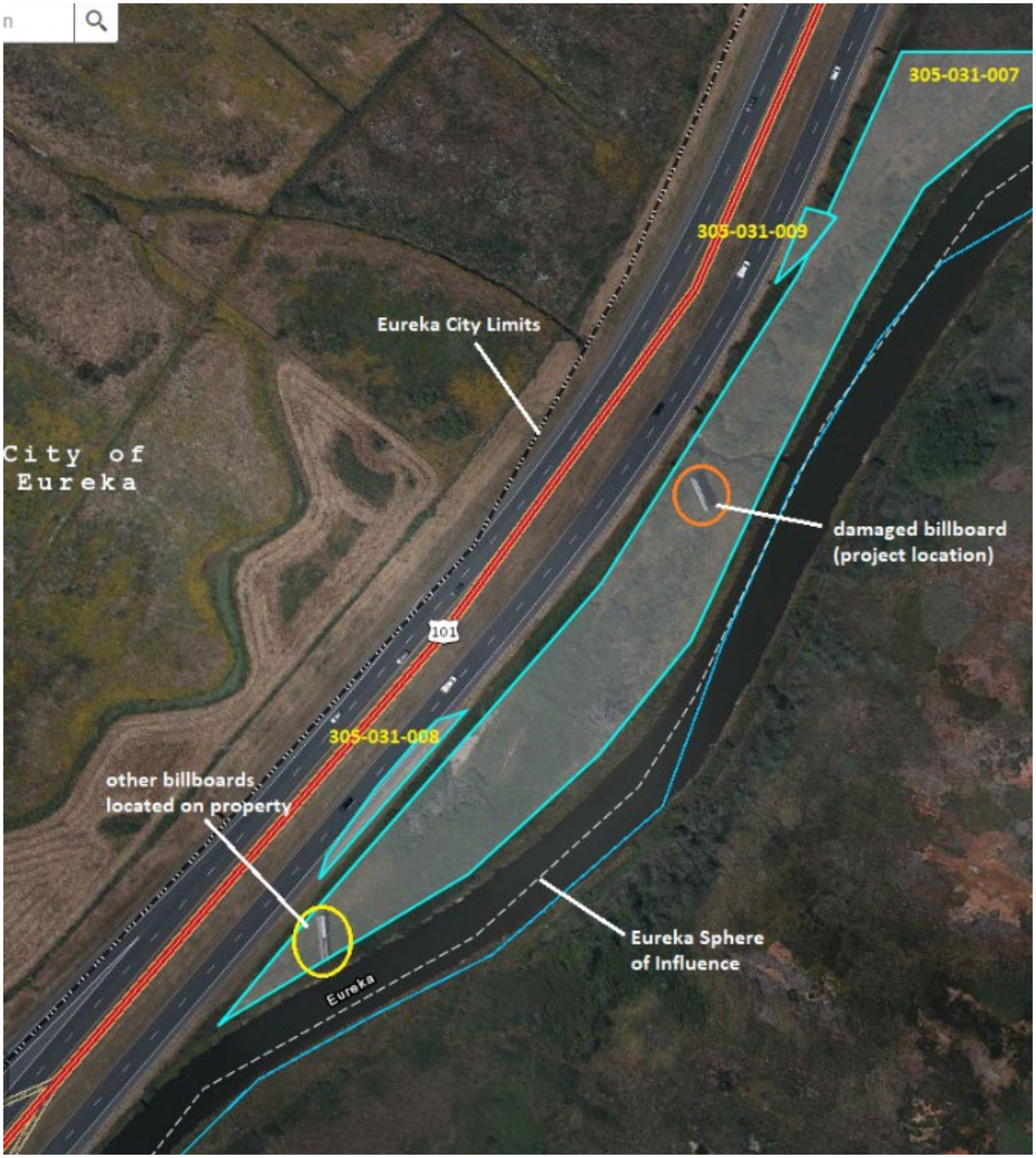

Figure 2: Vicinity Map –2019 aerial photo close up view

2.2.Site Background

2.2.1. Site Description

The property where the damaged billboard is located is comprised of (3) separate Assessor Parcels (APN 305-031-007, 305-031-008, and 305-031-009). All three parcels are unusually shaped owing to prior land conveyances during highway right-of-way acquisition and development. The largest (APN 305-031-007) is slightly under 5 acres in size and is host to three (3) separate billboards. Two (2) of these billboards are located near the southern end of the property and are in good condition and are actively engaged in commercial advertising at this time (Figure 3). The remaining billboard is located near the center of the property and is the focus of the current project (Figures 5 & 6). Width of the property varies as the legal description uses the Elk River to establish the eastern boundary and the western edge is set by the Highway 101 right-of-way. The parcel is approximately 75 feet wide in the area of the southern billboard structures and approximately 125 feet wide at the site of the damaged billboard.

Figure 3: Billboards at south end of property

The damaged billboard is located near the center of the property and is situated approximately 60 feet from the Elk River and 40 feet from the closest guardrail of the Highway. The surrounding area is characterized by salt marsh habitat and wetland vegetation. During a recent site visit conducted at high tide (5.4 ft.) on August 1, 2020, ground within the vicinity of the billboard was primarily dry. The Elk River is tidally influenced in this area. The variance in water levels during a common tidal cycle can be detected in the appearance of vegetation along the banks of the river (Figure 4). Figure 5 includes a picture of what the billboard looked like prior to the recent damage sustained while Figures 6 and 7 show the current condition of the billboard and the project site.

Figure 4: Western Bank of Elk River near southern billboards

Figure 5: Billboard prior to being damaged

Figure 6: view of damage from west side of structure

2.2.2. Zoning/Land Use

The project site is located on lands planned and zoned Agriculture Exclusive (AE). Combining zones related to Flood Hazard Areas and Coastal Wetlands (AE-F,W) are also applicable to the property. The rendering of the Elk River channel shown on applicable zoning and land use maps from the Humboldt Bay Area Plan does not show land between the Highway and Elk River channel in this area, making it difficult to immediately discern the applicable land use and zoning property. In examining the site location and land use/zoning of adjacent lands, the following facts result in the above conclusion. Along this stretch of Highway 101, areas adjacent to the eastern and western edge of the Highway 101 right of way are given a land use and zoning designation of Agriculture Exclusive. The Public Facilities (PF) land use/zoning is reserved for the Freeway right of way, and the river channel is zoned Natural Resources (NR). Given that the AE land use designation and zoning is applied to lands on the opposite side of the freeway as well as adjacent lands immediately north and south of the parcel, AE is the most fitting land use and zoning for the subject property. In the County GIS the three assessor parcels are clearly shown and given a land use designation of PF. The GIS map incorrectly shows this parcel as being in the City of Eureka, but the parcel data layer shows the zoning as AE with a wetland and floodplain overlay. None of these zones and their attendant land use designations explicitly authorize off-site/non-appurtenant advertising or signs (i.e., billboards). For this reason, the existing sign is viewed as a non-conforming structure and use.

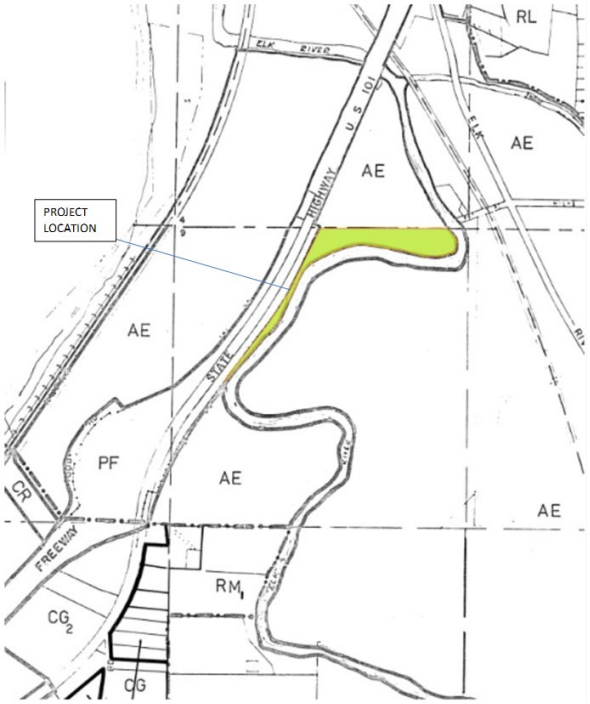

Figure 8: Land Use Map

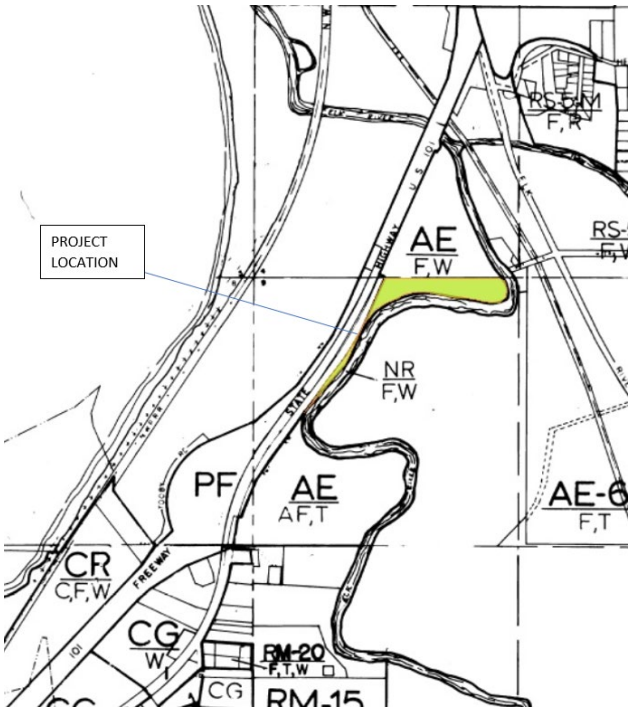

Figure 7: Zoning map

2.2.3. Historical Use/Existing Condition

A review of relevant historical documents (deeds, mapping, and aerial photos) provides insight into the ownership and development history of the property and surrounding area and helps contextualize the circumstances surrounding original placement of the sign. Aerial photographs obtained from HSU Special Collections demonstrate that the damaged billboard has been at this location since at least 1955, thereby predating adoption of the Zoning Regulations, Building Codes, the General Plan, as well as establishment of the Coastal Zone and adoption of the Humboldt Bay Area Plan (HBAP) which serves as the local coastal plan covering the Spruce Point area. The sign is therefore eligible for recognition as a lawful non-conforming structure.

Nonconforming uses and structures are a unique category of development granted special consideration under sections 313-131 and 313-132 of the Zoning Regulations, which provide protection for non-conforming uses and structures, where lawfully established. Provisions include rights to retain and continue the use/structure, and conditions under which they may be expanded, substituted, structurally altered, reinitiated, or reconstructed where damaged by casualty.

The billboard is a wooden structure primarily comprised of 4x6 and 2x6 framing. Periodic replacement of various structural elements (posts, bracing, plywood) has undoubtedly occurred multiple times during the 65+ years it has been located at this site, especially given that it is located outdoors in a marine environment (¼-mile from Humboldt Bay).

A review of historical mapping for the area (between 1898 and 1949) reveals the presence of an earlier road right-of-way alignment and bridge across the Elk River which significantly differ from the course of today's freeway (US Highway 101). Vegetation patterns and the presence of bridge supports along both banks of the river still provide physical evidence and clues of this. The earlier right of way crossed east-west near the northern limits of the property (APN 305-031-007) and is referenced in the current legal description point of beginning "*BEGINNING on the South side of the County Road, as the same existed on June 20, 1874 and on the West bank of Elk River at the bridge of the Old Elk River County Road near Elk River Corners*"

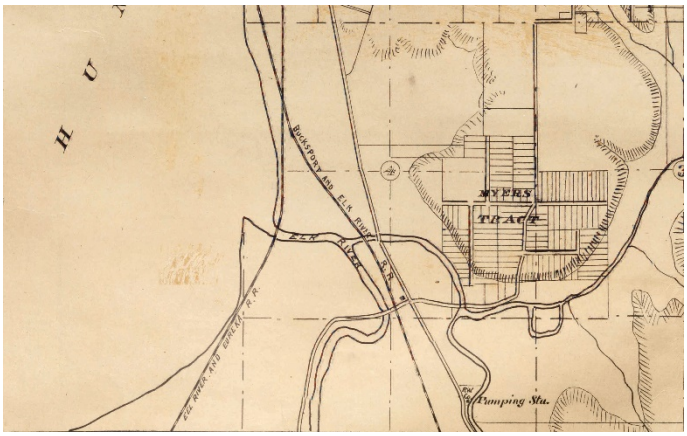

Figure 9: Excerpt from 1898 Lentell Map

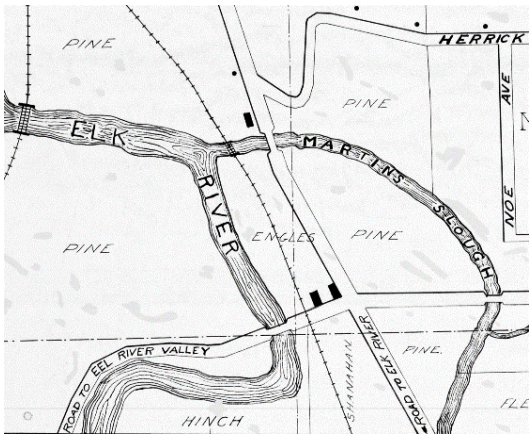

Figure 10: Excerpt from 1916 Belcher Map

Figure 12: 1911 Denny Map (excerpt)

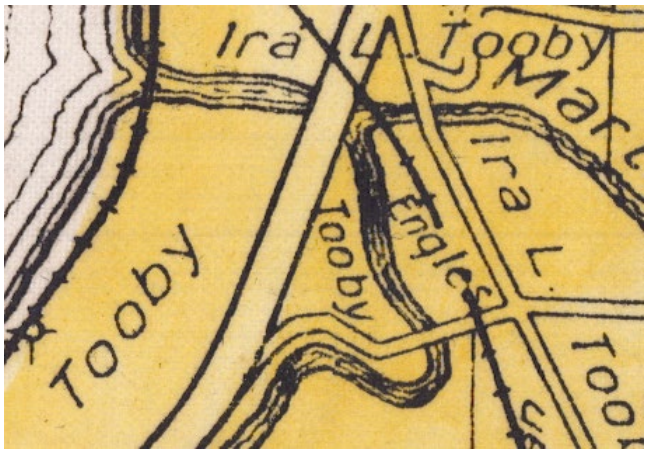

Figure 14: 1921 Belcher Map (excerpt)

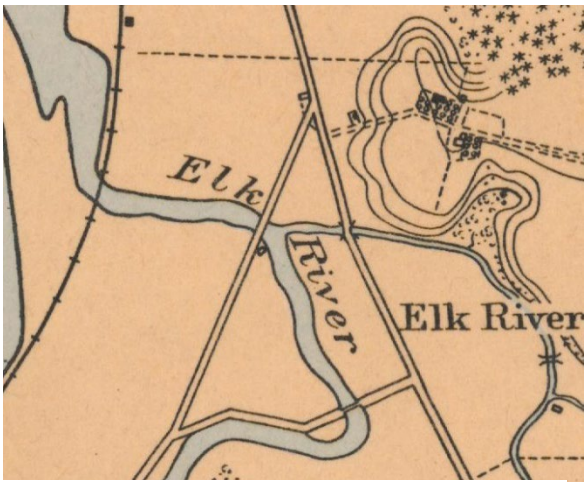

Figure 15: 1949 Coast Survey Map (excerpt)

Figure 13: 1942 USGS Map (excerpt)

Figure 11: bridge location from old Elk River county road alignment

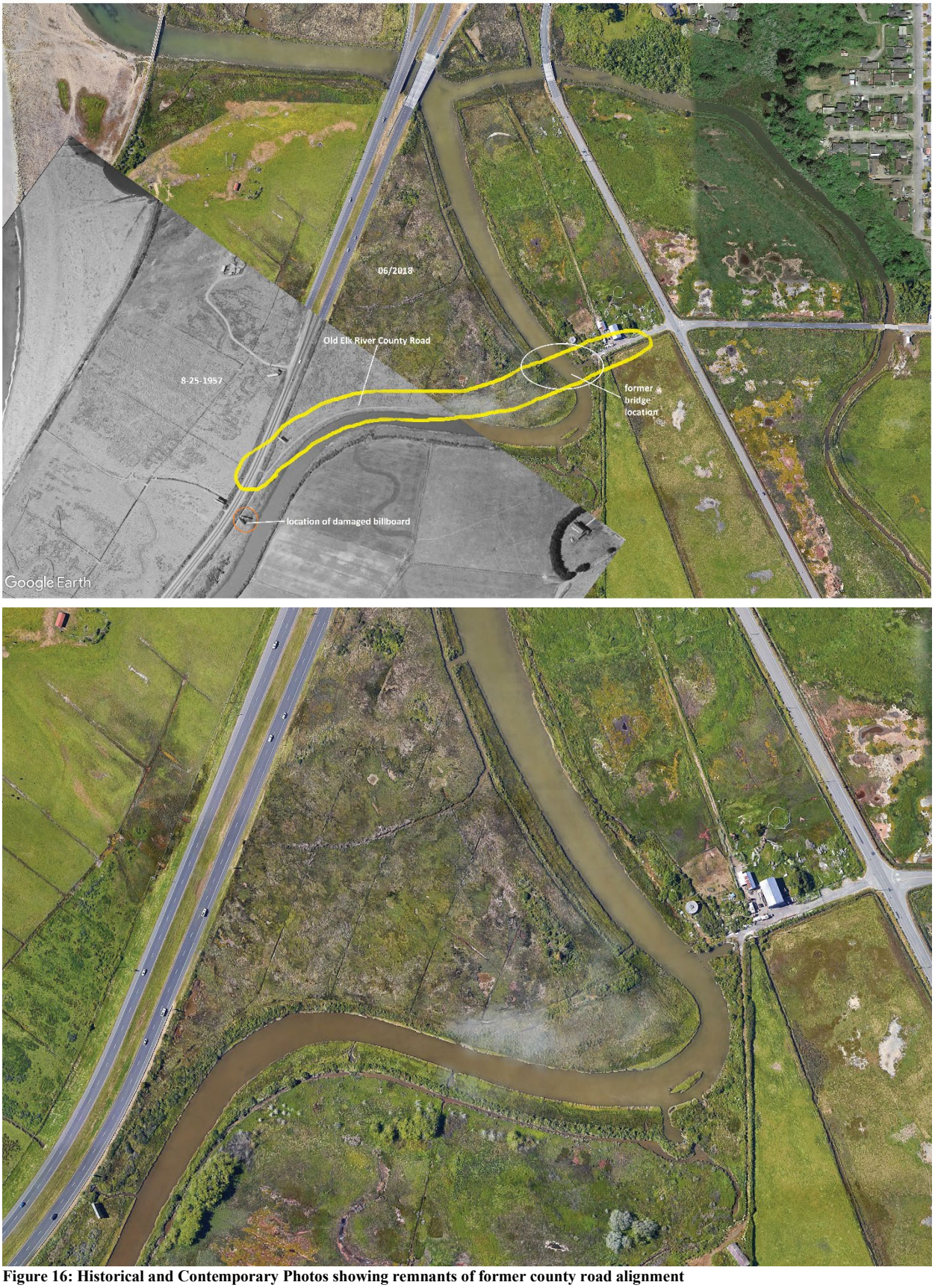

Figure 16: Historical and Contemporary Photos showing remnants of former county road alignment

2.2.4. Surrounding Uses

Neighboring land uses within the vicinity of the project are varied. The parcel is situated at bottom end of the Elk River valley where grazing is the dominant land use type. North of the project this transitions to commercial development in the City of Eureka (adjacent to Broadway / Highway 101) and residential development in the Pine Hill area. Immediately south of the project is the Spruce Point area located near the base of Humboldt Hill. This area is developed with a mixture of commercial and industrial uses as well as higher density residential uses (Sea Bluff apartments, Sea View Mobile Estates, and Humboldt Bay Mobile Estates). Southwest of the project and west of Highway 101 is located the PG&E Humboldt Bay Power Plant and community of King Salmon.

Billboards in the vicinity

Approximately fourteen (14) other billboards are found within a three mile stretch of Highway 101 where the project is located. Nine (9) of the billboards are located on the east side of the highway (including two other signs on the subject parcel) and five (5) are located on the west side of the highway. All of the billboards are single-facing and the majority are situated to face northbound traffic. Only one location is host to billboards facing both north and southbound traffic.

A review of historical aerial photos from 1957 reveals signage at 9 distinct locations (including the project location) along a 0.6 mile stretch of highway immediately north of Spruce Point. At nearly all of these locations were multiple signs facing north and southbound traffic. Today signage remains in only two (2) of these locations –both of which are located east of Highway 101 and are found on the subject property.

Figure 17: nearby billboards within 3 miles of project location

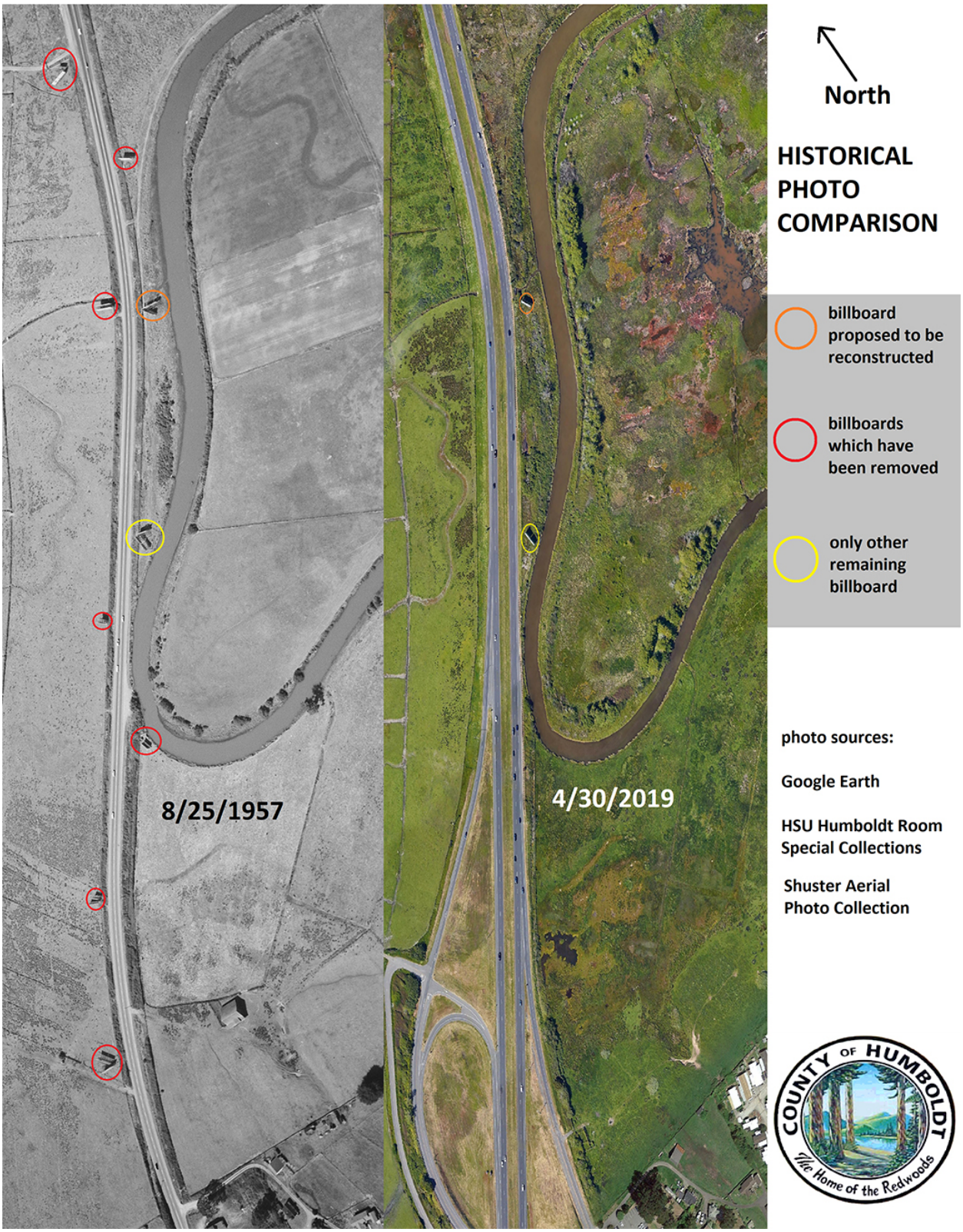

Figure 18: Historical Photo Comparison

2.3.Project Description

A permit is being sought to allow for repair of a fallen billboard. A total of eighteen (18) wooden vertical posts are used to support the billboard structure. Vertical supports are divided between the six (6) main 4x6 vertical supports, six (6) 2x6 posts connected to horizontal bracing at the rear of the billboard, and six (6) 2x6 posts connected to horizontal bracing in front of the billboard. Erection of the sign will require replacement of six (6) of the damaged posts with new wooden framing. Three (3) of the posts to be replaced are main vertical supports (4x6) and the other three (3) posts tie to horizontal bracing at the rear of the billboard.

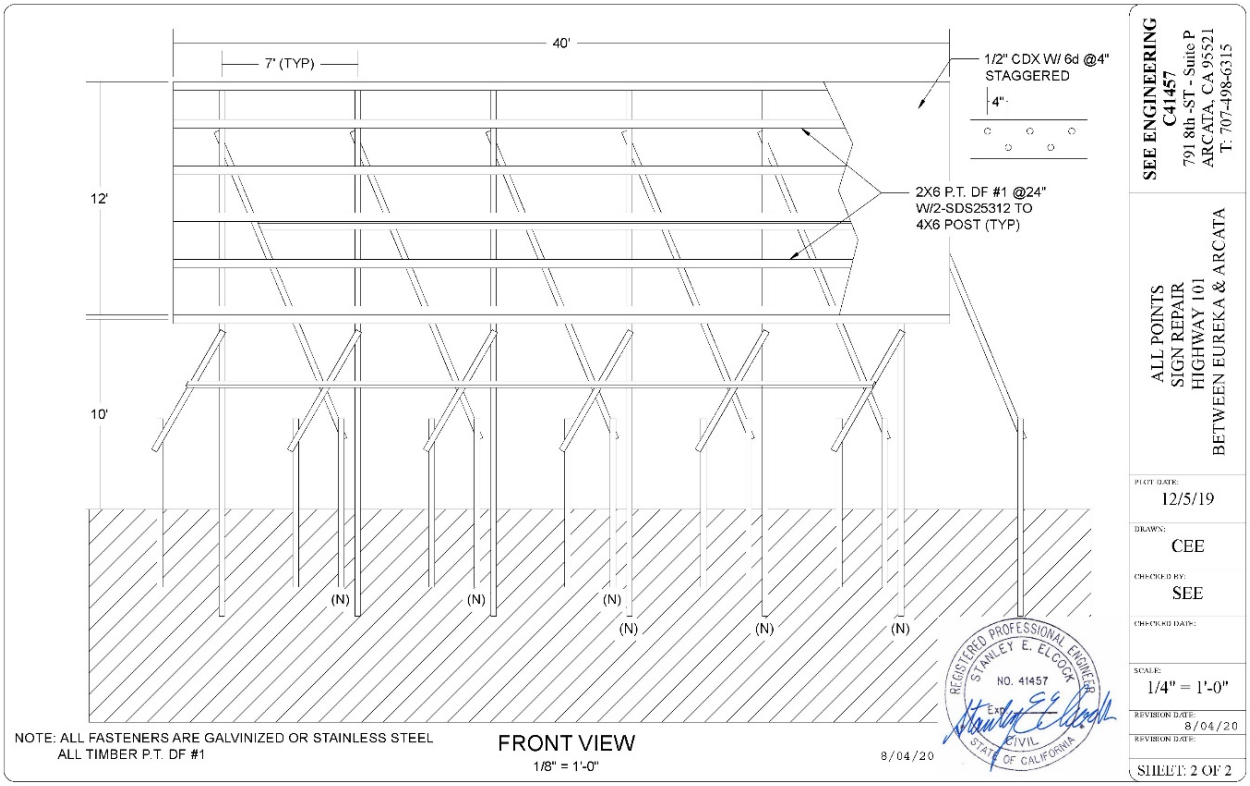

Figure 19: Engineered Plans for Sign Repair – Front View

Holes for the six (6) new posts will be 18 inches wide and dug within the same location as the holes for the damaged supports they are replacing. Holes for the three (3) new main vertical supports will be 5 feet deep and holes for the three (3) new rear brace supports will be 3 feet deep. Concrete will be poured into each hole during installation of the six (6) new posts.

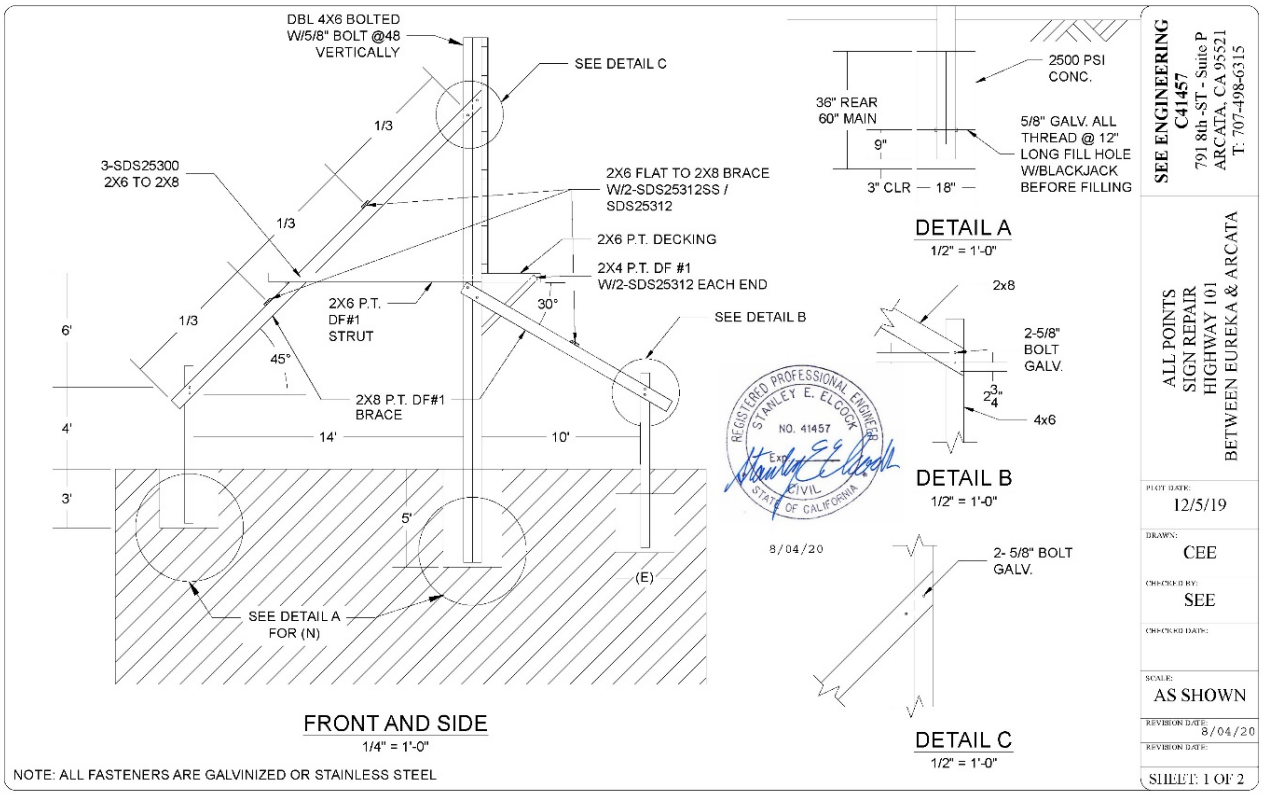

Figure 20: Engineered Plans for Sign Repair – Profile View showing footing & bracing detail

Reconstruction Plans provided by the applicant are included in the Appendices to this document (Appendices 5.1 and 5.2) and reveal that repair of the billboard will be performed using a crew consisting of 3-5 persons and that work is expected to take 2-4 days to complete the steps necessary to allow for re-erection of the sign. No heavy construction equipment or gas-powered equipment is needed. Shovels and post-hole diggers are used, as well as battery powered hand tools, ladders, and clamps, bolts and screws. No temporary structures or materials (such as scaffolding or temporary bracing) are required to complete repairs to the sign structure. Materials will be staged adjacent to the guard rail and outside of traveled way and shoulder.

3. 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 all responses follows in Section 4 of 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.

3.1. 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.

☐ 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.

Signature

8/11/20
Date

3.2.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 questions. 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 citied in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

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

3.2.1. Aesthetics

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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?	☐	☒	☐	☐

Discussion

The 2017 General Plan includes a number of policies designed to restrict the term and placement of billboards, prohibit their construction within Sensitive Habitat Areas, compel their removal or relocation on public lands and railroad rights of way, and prompt removal of illegal billboards. However, a new General Plan governing uses within the Coastal Zone has not yet been adopted by the Board of Supervisors nor certified by the Coastal Commission and therefore the above described provisions do not apply to the project under consideration. The Humboldt Bay Area Plan (HBAP) serves as the basis for land use planning within this portion of the Coastal Zone. The placement of new off-site signs is highly restricted under the scenic resources provisions of the HBAP. However, the existing billboard site is outside of the coastal view area mapped within the HBAP. The plan also commits to preparation of a Scenic Route Study for portions of Highway 101, including the segment adjacent to the project location. Described as a joint-effort between CalTrans and the County Planning Department and subject to Coastal Commission approval, the special emphasis of the study is to investigate opportunities for Cal-Trans, the county, and the Harbor District to eliminate billboarding between Eureka and Arcata and to identify suitable areas for clustered signing, and new off-site signs. As the Scenic Route Study has not been initiated at this time, it is inappropriate to speculate upon potential outcomes or use it as a basis to evaluate the current permit request for reconstruction of a lawful nonconforming structure damaged by casualty. The policy does not carry a prohibition of the reconstruction of signs at this location as it does with respect to the corridor between Eureka and Arcata. Signage has existed at this location for over 60 years and is therefore part of the environmental baseline.

The project involves repair of a lawful existing structure. No changes to the height or width of the billboard or number of posts is proposed and no expansion of the sign size or footprint will result.

Whether the billboard is perceived positively or negatively by members of the public, since no change in the baseline visual signature of the structure should result from the proposed repairs, impacts to the visual character of the setting may be viewed as less than significant.

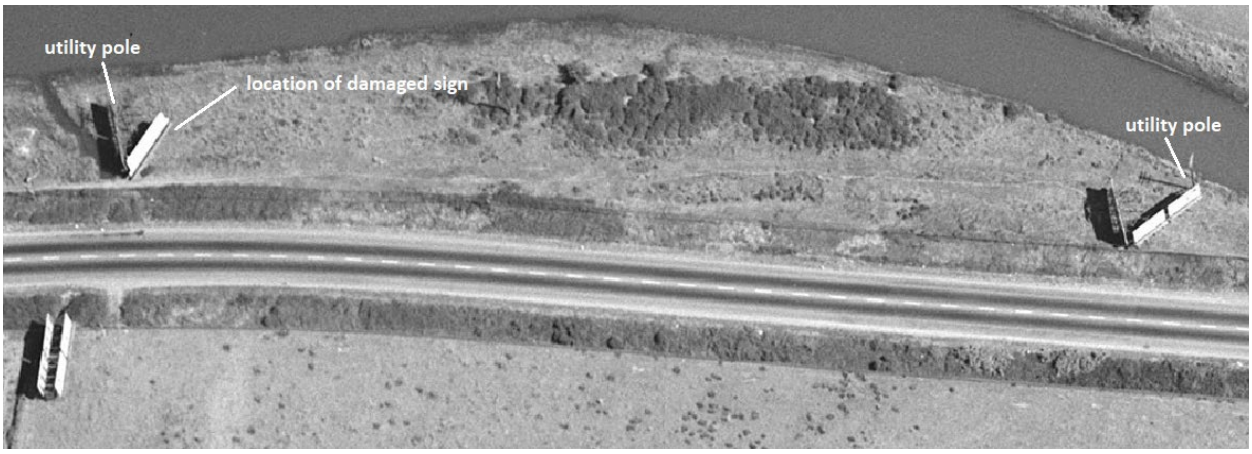

Figure 21: sign in 1957 photo (excerpt)

Though not currently lighted, it is likely that the sign was previously illuminated during the early years following its erection. Evidence of this exists in the presence of conduit and junction boxes still found on the structure and historical photos from 1957 confirm that power lines once crossed through the property immediately east of the sign site. Utility lines are no longer located on the property, sign lighting is currently inoperative, and the project applicant is not requesting to repair or restore electrical service to the sign. Conditions of approval for the project include an operational restriction prohibiting sign lighting.

(a), (b), (c) – Less Than Significant Impact: The project is not located within a city- or county-mapped, or designated, scenic vista; within a scenic resources area; or along a state scenic highway (Caltrans, 2013). There are no rock outcroppings and trees and there are no buildings at the site. The project is not located within an urban or urbanized area substantially. Having existed at the site for over sixty (60) years, repair of the billboard is unlikely to degrade the existing visual character or quality of public views of the site and its surroundings. While the backside of the billboard structure is visible by recreational boaters using neighboring Elk River slough, views in this direction are already affected by the sight of vehicles using the freeway less than 150 feet away. Semi-trucks and consistent traffic traveling at a high rate of speed is common along this segment of the Highway.

Temporary construction activities will involve removal of six (6) damaged support posts and digging out the existing holes in these locations to facilitate installation of six (6) new posts. Work will be performed without the use of heavy equipment. By re-using the existing post hole locations, potential for new ground disturbance is significantly reduced. Additionally, all spoils will be removed from the site using buckets. Aesthetic impacts from this temporary disturbance will therefore be minimal.

(d) – Less Than Significant Impact with Mitigation Incorporated: The sign is currently unlighted and no lighting is proposed to be installed as part of the current project. AES-1 prohibits sign lighting to prevent this potential intensification of the non-conforming use.

Mitigation Measures:

AES-1: Sign lighting is prohibited.

Finding: With the above mitigation incorporated, the Project would have a **less than significant impact** on aesthetics.

3.2.2. Agriculture and Forestry Resources

Would the project:	Potentially 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 land (as defined in Public Resources Code section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?	☐	☐	☐	☒

Discussion

The proposed project repair of lawful nonconforming billboard structure. While the parcel and neighboring lands in the vicinity are planned and zoned for agriculture uses, no conflict is expected to result from repair and re-erection of the sign. The site and similar parcels in the surrounding area have hosted similar structures for over 60 years. These structures are part of the environmental baseline and continue to successfully co-exist with historical and ongoing agricultural development activities and uses.

(a) – (e) No impact: Humboldt county is not included in the California Department of Conservation's Farmland Mapping and Monitoring program. Additionally, no increase in the footprint of the structure would result from the proposed repair. The closest lands under

Williamson Act contract are located over a quarter of a mile from the billboard site and lie on the opposite side of the Elk River from the property. The project site is unforested and is characterized by transitional agricultural lands There are no lands host to commercial timber species or zoned for Timber Production (TPZ) in the immediate vicinity of the project. The project would not result in changes to the site above the environmental baseline so non potential exists for conversion of Farmland to occur as a result of the project activities.

Mitigation Measures: No mitigation required.

Findings: The project would have a **no impact** on agriculture and forestry resources.

3.2.3. Air Quality

Where available, the significance 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 (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

Discussion:

Humboldt County is listed as "attainment" or "unclassified" for all federal and state ambient air quality standards except the state 24-hour standard for particulate matter of 10 microns or less (PM_{10}), for which Humboldt County is designated "nonattainment." PM_{10} air emissions include chemical emissions and other inhalable particulate matter with an aerodynamic diameter of less than 10 microns. PM_{10} emissions include smoke from wood stoves, airborne salts, diesel exhaust, and other particulate matter naturally generated by ocean surf. Primary sources of particulate matter include on-road vehicles (engine exhaust and dust from paved and unpaved roads), open burning of vegetation (both residential and commercial), residential wood stoves, and stationary industrial sources (factories). In 1995, the Air District conducted a study to identify the major contributors of PM_{10}, which is summarized in the draft report entitled Particulate Matter PM_{10} Attainment Plan. According to the Air District website, this report should be used cautiously as it is not a document that is required in order for the Air District to come into attainment for the state standard. Cars and trucks and other vehicles are considered a source of particulate matter

within the district. Fugitive emissions as a result of vehicular traffic on unpaved roadways are the largest source of particulate matter emissions within the district.

In determining whether a project has significant air quality impacts on the environment, planners typically apply their local air district's thresholds of significance to projects in the review process. However, the Air District has not formally adopted significance thresholds, but rather utilizes the Best Available Control Technology emission rates for stationary sources as defined and listed in the Air District's Rule 110 - New Source Review and Prevention of Significant Deterioration. The Air District does not currently have any thresholds for toxics, but recommends the use of the latest version of the California Air Pollution Control Officers Association's "Health Risk Assessments for Proposed Land Use Project" to evaluate and reduce air pollution impacts from new development.

(a) – (e) No impact: The proposed project involves repair of an existing sign at a location where signs have been sited for over 60 years. The repair will involve no gas-powered equipment and instead primarily involve hand tools and some use of electric drills. Project repair activities are expected to be completed in 2-4 days. No impacts to air quality will result from the proposed project activities.

Mitigation Measures: No mitigation required.

Findings: The project would have **no impact** Air Quality.

3.2.4. 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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) 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?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors,	☐	☐	☒	☐

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

Discussion:

The project setting is characterized by a number of aquatic features that provide critical habitat for rare and endangered species. Anadromous Fish Species include Coho Salmon, Coastal Cutthroat Trout and Steelhead as well as non-anadromous species such as well as California floater, and Pacific Lamprey. The California Natural Diversity Database mapping also shows that the project site is located near the edge of habitat for the Siskiyou Checkerbloom and Tidewater Goby.

The proposed project is for repair and reconstruction of a lawful existing structure. Ground disturbing activities will be confined to the most upland portions of the property and outside the nearby channel of the Elk River and a related arm which crosses beneath Highway 101 in this area. Review of the reconstruction plan and Best Management Practices provided by the applicant (Appendices 5.1 & 5.2) reveals the project has been designed to minimize the potential for ground disturbance, thereby reducing potential adverse effects to biological resources. These design features include: ongoing use of a pier and post foundation, retaining and reusing as many of the existing billboard supports (12) as possible, limiting the installation of new vertical posts to six (6) and installing each within the same location as the post they are replacing. Repairs will be done by a hand crew without the use of heavy machinery, and minimal ground disturbance is anticipated.

Historical photographs reveal that the site has hosted similar structures for over sixty (60) years, and the site and surrounding area have a long history of significant prior disturbance associated with the earlier county road alignment, utility lines, and use by the Elk River Lumber Company. The condition of the wetland plants found in the immediate vicinity of the billboard supports is indistinguishable from other areas further away hosting this same plant community, demonstrating that structures of this sort can co-exist without resulting in permanent degradation of habitat. Disturbance will be minimal as many of the footings will be available for reuse and the existing structure has been present on the site for over 60 years.

(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?

Less than significant impact: By its nature, the sign is elevated and its supports are all located above the ordinary high water mark so conflict with local aquatic species and habitat will not result from its repair and continued use. The project will require minimal new ground disturbance and all disturbance will occur within areas that were previously developed with materials of identical size.

(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 Wildlife or U.S. Fish and Wildlife Service?

(c) 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?

Less Than Significant Impact with Mitigation Incorporated: While all proposed new ground disturbing activities will be located within upland portions of the property hosting similar development, a mitigation measure (BIO-1) has been included to help minimize the potential for disturbance of nearby riparian habitat by requiring that all post hole work be completed during days where the daytime high tide is 5.5 feet or lower. At a site visit during a 5.4-foot high tide on August 1, 2020 it was observed that all existing billboard footings were dry and several feet above the high tide line. On average, the daytime high tide is at or below this level during half of the days each month.

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?

Less Than Significant Impact: The project is located within a wetland environment and wetlands are recognized as an Environmentally Sensitive Habitat Area (ESHA) under the local coastal plan. While development of this type is not normally permitted within ESHA, both the Coastal Act and local coastal zoning regulations provide protections for repair and maintenance of existing structures, as well as replacement and reconstruction of structures destroyed by a disaster or casualty. As mentioned in the project description and Land Use discussion and background, the project involves repair of a lawful nonconforming billboard structure that was damaged during a winter storm event in November 2019. The zoning ordinance includes explicit protection for nonconforming structures and uses including reconstruction where damaged by casualty. Therefore, the proposed project would not conflict with applicable policy and ordinance.

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

No impact: There are no local, regional, or state habitat conservation plan governing activities at the project location. The closest Habitat Conservation Plan was developed in concert in concert with creation of the Headwaters Forest Preserve and covers activities logging activities on nearby timberland managed by the Humboldt Redwood Company.

Mitigation Measures:

BIO-1: Post hole digging and installation may only occur on days where the daytime high tide is 5.5 feet or less.

Finding: With the above mitigation incorporated, the Project would have a **less than significant impact** on Biological Resources.

3.2.5. Cultural Resources

Would the project:	Potentially 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 as defined in 15064.5	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to 15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Discussion

(a)-(c) – Minimal ground disturbance will be necessary to complete the required repairs to the existing sign. Six damaged posts are proposed to be removed and replaced with new ones of identical size. Holes will be 18 inches in diameter, dug in the same location as the existing posts being replaced, and of comparable depth to the original holes dug for the structure –36 inches and 60 inches. A standard informational note is included with the project conditions of approval which describes the steps that must be taken in the unlikely event that tribal cultural resources are encountered during ground disturbing activities. The Tribal Historic Preservation Officer (THPO) from the Wiyot Tribe and Bear River Band of the Rohnerville Rancheria have both been contacted and provided feedback on the project, indicating that the project location has a low possibility for containing tribal cultural resources. Both THPO's have indicated that they support the project proceeding as proposed. Historical resources could also be present in the vicinity of the project given the proximity of the site to the old Elk River County Road. However, given that all new posts will be within the footprint of existing supports, the minimal excavation needed is unlikely to disturb historical resources either.

Mitigation Measures: No mitigation required.

Findings: The project would have a **less than significant impact** on cultural resources.

3.2.6. Energy

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Discussion

(a)-(b) – No Impact: The project involves repair of an existing billboard. Repairs will primarily involve use of hand tools and limited use of battery powered drills and other equipment. The sign is not currently illuminated and lighting is prohibited under AES-1. Repairing an existing structure carries a significantly smaller energy footprint as it allows for conservation of the embodied energy associated with the original building materials being retained and utilized.

Mitigation Measures: No mitigation required.

Findings: The project would have **no impact** on energy.

3.2.7. Geology and Soils

Would the project:	Potentially 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-Prlolo 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 soils, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
e) 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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Discussion:

(a)-(f) – No Impact: The project involves repair and re-erection of an existing billboard. Minimal ground disturbance is required to complete the necessary repairs to the structure and all excavation is proposed to occur within the footprint of the existing sign supports. Billboards have been located at this site and the vicinity for over 60 years and there is no history of mapped landslides or other instability. There is no evidence of expansive soils or potential for unique paleontological resources. The project does not involve or require the installation or use of a septic system

Mitigation Measures: No mitigation required.

Findings: The project would have **no impact** on geology and soils.

3.2.8. Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions (GHG), 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 GHG?	☐	☐	☐	☒

Discussion:

Section 15064.4 of the CEQA guidelines specifies how the significance of impacts from greenhouse gas (GHG) emissions is to be determined. The Lead Agency is to make a good faith effort to describe, calculate, or estimate the amount of GHG emissions that will result from a project. The local Climate Action Plan for Humboldt County is currently being drafted. As such, there is currently no adopted plan or policy for the County of Humboldt specifically related to greenhouse gas emissions. However, the project would not pose any conflict with CARB's

early action strategies or the Vibrant Communities and Landscapes / VMT Reduction Goals goals listed in CARB's 2017 Scoping Plan Update. Additionally, because the project is not classified as a major source of greenhouse gas emissions, the greenhouse gas emissions produced would not conflict with the state's ability to meet its AB 32 or SB 32 goals.

(a)-(b) – Less Than Significant Impact: The primary greenhouse gas emissions that can be expected to be produced by this project are those produced by vehicle emissions associated with carrying personnel, equipment, and materials to the project site. Construction activities are proposed to take 2-4 days to complete. The work will be performed by the property owner "Allpoints, Inc." who is a licensed sign contractor and maintains a shop in Eureka 6.5 miles from the project location. GHG emissions resulting from the project will not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Given the temporary nature of the project, modest number of trips and mileage required to complete the required construction activities, potential for significant impacts from GHG emissions is unlikely.

Mitigation Measures: No mitigation required.

Findings: The project would have a **less than significant impact** on greenhouse gas emissions.

3.2.9. Hazards and Hazardous Materials

Would the project:	Potentially 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?	☐	☐	☐	☒

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

Discussion

(a),(b) – No Impact: This project will not involve the routine transport, use, or disposal of hazardous materials. The project will not generate reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The project will not emit hazardous emissions or involve handling or hazardous or acutely hazardous materials, substances, or waste. No construction activities involving possible hazardous materials will occur in association with this project

(c) – No impact: The project is not located within a quarter mile of any schools. Furthermore, the project will not involve emitting any hazardous emissions, the handling of hazardous or acutely hazardous materials, substances, or wastes.

(d) – No impact: The site has not been identified on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The state of California Environmental Protection Agency, Department of Toxic Substances Control's EnviroStor website was reviewed on August 11, 2020 (http://www.envirostor.dtsc.ca.gov/) as well as the State Water Resources Control Board Geotracker website (https://geotracker.waterboards.ca.gov/). No concerns were identified for the site. The nearest identified site is associated with KIEM-TV Eureka and is located approximately 3700 feet to the south. The database shows that the cleanup of the site has been completed (Case #: 1NHU603).

(e) – No impact: The project is not located within 2 miles of a public airport or private airstrip. The project will be completed in 2-4 days and is not expected to generate excessive noise.

(f) – No impact: The project would not interfere with an adopted emergency response plan or emergency evacuation plan.

(g) – No impact: The project is located in an area with very low risk of fire hazard. The closest areas of State Responsibility for Fire Protection are located over approximately ½-mile south and west of the project. The billboard is located only 60 feet from the Elk River, a tidally influenced waterbody.

Mitigation Measures: No mitigation required.

Findings: The project would have a **no impact** on hazards and hazardous materials.

3.2.10. 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 groundwater 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?	☐	☐	☐	☒

Discussion

The proposed project is for repair and reconstruction of a lawful existing structure. Ground disturbing activities will be confined to the most upland portions of the property and outside the nearby channel of the Elk River and a related arm which crosses beneath highway 101 in this area. Review of the reconstruction plan and Best Management Practices provided by the applicant (Appendices 5.1 & 5.2) reveals the project has been designed to minimize the potential for ground disturbance, thereby reducing potential adverse effects to water quality. These design features include: ongoing use of a pier and post foundation, retaining and reusing as many of the existing billboard supports (12) as possible, limiting the installation of new vertical posts to six (6) and installing each within the same location as the post they are replacing. Repairs will be done by a hand crew without the use of heavy machinery, and minimal ground disturbance is anticipated.

(a) – Less Than Significant Impact with Mitigation Incorporated: Minimal ground disturbance will be necessary to implement the project. The existing billboard is constructed with wooden framing materials (2x6 and 4x6) and plywood construction is used for the sign face. Some of the existing framing materials are pressure treated while others are not. To prevent the possibility

for leaching of chemicals from wood preservatives to neighboring wetland soils and the nearby water courses, a condition of approval is included prohibiting use of pressure treated wood where installing new materials in place of older damaged framing components. This is included as WQ-1 below. BIO-1 is also included to help prevent the potential for dug soils to interact with surface water during an extreme high tide event.

(b) & (e) – No Impact: The project involves no water use. Impacts to neighboring groundwater supplies or recharge are therefore unlikely. The project involves repair of damage to an existing structure and proposes minimal ground disturbance. There is no water quality control plan or groundwater management plan currently applicable to the project area.

(c) & (d) – No Impact & Less Than Significant Impact: No new development is proposed to occur at the project site, only repair and replacement of the structural components for an existing sign. No change in surface water runoff will therefore result. The project involves repair to a structure located within a mapped flood zone (06023C0839G) which lawfully predates local flood regulations. The applicant has submitted information prepared by a licensed engineer documenting relevant structural calculations, and the project will be required to demonstrate compliance with the Flood Damage Prevention Ordinance prior to issuance of any building permit for repairs to the sign. Given the minimal amount of new materials to be used during repair of the damage, the project may not constitute "substantial improvement" pursuant to the local Flood Zone regulations, as this requires total cost of the repair to equal 50 percent of the market value of the structure. The billboard utilizes post and pier construction and the catwalk and sign face are elevated 6-10 feet above ground level, enabling passage of water between piers during a flooding event. Ground level in the vicinity of the supports for the structure is approximately nine 9½ feet above sea-level. Run-up predictions for this latitude indicate the lands above approximately 8¼-feet in elevation (above sea-level) lie above the area effected during a tsunami run-up event at the 100-year interval.

Mitigation:

WQ-1: During repair and reconstruction activities, new materials shall exclusively feature resistant lumber that has been structurally graded, such as Cedar, Redwood or similar woods that are naturally durable. Metal supports may be substituted where featuring similar durability. Use of pressure-treated wood is prohibited.

Findings:

With the above mitigation incorporated, the Project would have a **less than significant impact** on Hydrology and Water Quality.

3.2.11. 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?	☐	☐	☒	☐

Discussion

The project involves repair of an existing lawful nonconforming billboard structure. By definition, non-conforming structures and uses conflict with one or more provisions of the Zoning Regulations. The project clearly conflicts with certain provisions of the Coastal Zoning Regulations which would ordinarily be applicable to projects involving new off-site/non-appurtenant signage (i.e. "billboards"). Billboards are not explicitly authorized within any of the Zoning Districts applicable to the property in which it is located. Evidence suggests that the billboard is located within a wetland, and subject to compliance with Coastal Wetland Areas Combining Zone provisions found in section 313-38.1. Signs are not a form of development which may occur within these areas. Billboards are considered structures subject to compliance with applicable setbacks and the existing billboard structure is located within the 20-foot front yard setback. The project also conflicts with certain provisions of the Humboldt Bay Area Plan (HBAP), which would ordinarily be applicable to projects involving new off-site/non-appurtenant signage (i.e. "billboards"). Billboards are not explicitly authorized within any of the Land Use Designations applicable to the property. The billboard lies within a strip of land adjacent to the western bank of the Elk River. The project area is characterized by plants and hydrology common to riparian areas and wetlands. Aquatic features such as rivers, wetlands, estuaries and related critical habitat for rare and endangered species are all recognized and protected as Environmentally Sensitive Habitat Areas (ESHA) pursuant to 30240 of the Coastal Act and 3.30 of the HBAP. Billboards are not a form of development which may occur within ESHA.

(a) – No Impact: The project involves repair of an existing structure located on private property east of Highway 101. Billboard structures have existed at this site and in the vicinity for over 60 years. The project would not result in a change beyond the environmental baseline for the site.

(b) – Less Than Significant Impact: Nonconforming uses and structures are a unique category of development granted special considerations under sections 313-131 and 313-132 of the Coastal Zoning Regulations, which provide protections for lawfully established non-conforming uses and structures, including rights to continue these uses and structures, and conditions under which they may be expanded, structurally altered, or reconstructed where damaged by casualty.

Mitigation Measures: No mitigation required

Findings: The project would have **less than significant impact** on land use and planning.

3.2.12. 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 recover site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Discussion

(a)-(b) – No impact: The project will not use or otherwise deplete any mineral resources that are of value to the region or state.

Mitigation Measures: No mitigation required

Findings: The project would have **no impact** on mineral resources.

3.2.13. Noise

Would the project result in:	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?	☐	☐	☐	☒

Discussion

All noise from the proposed project activities would be temporary in nature as the proposed repair work is expected to require 2-4 days to complete. Work will be performed during daylight

hours. No heavy equipment will be utilized and all power tools used operate off battery power. Vehicles traveling on Highway 101 are the largest noise source in the area.

(a)-(c) – No impact: The project will not result in a permanent increase in noise levels nor generate excessive groundborne vibration or noise. The project is not located within 2 miles of a public airport or private airstrip.

Mitigation Measures: No mitigation required

Findings: The project would have **no impact** on noise.

3.2.14. Population and Housing

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

Discussion

(a), (b) – No impact: The proposed project has no association with population or housing.

Mitigation Measures: No mitigation required.

Findings: The project would have **no impact** on population and housing.

3.2.15. Public Services

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
a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒

e) Other public facilities?	☐	☐	☐	☒

Discussion

(a) through (e) – No impact: There is no reason to expect that authorizing repair of the existing billboard structure would result in a significant increase in demand for public services.

Mitigation Measures: No mitigation required.

Findings: The project would have **no impact** on public services.

3.2.16. Recreation

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

(a)-(b) – No Impact: The proposed project would not contribute to substantial population growth or other such activities that would put significant additional pressures on area parks or recreational facilities. No potential impacts would result from the proposed project activities.

Mitigation Measures: No mitigation required.

Findings: The project would have **no impact** on recreation.

3.2.17. Transportation/Traffic

Would the project:	Potentially 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)?	☐	☐	☐	☒

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?	☐	☐	☐	☒

Discussion

(a), (b), (d) – No impact: The project involves repairs to an existing billboard structure located adjacent to Highway 101. The project would not conflict with any program, plan, or policies governing circulation. Section 15064.3(b) of the CEQA Guidelines includes criteria for analyzing transportation impacts. At this time local guidance for evaluating vehicle miles traveled (VMT) impacts is still in draft form. Where existing models or methods are not available, a lead agency may perform a qualitative analysis. The primary vehicles miles traveled that can be expected to be produced by this project are those resulting from vehicle trips associated with carrying personnel, equipment, and materials to the project site. Construction activities are proposed to take 2-4 days to complete. The work will be performed by the property owner "Allpoints, Inc." who is a licensed sign contractor and maintains a shop in Eureka 6.5 miles from the project location. Given the temporary nature of the project and modest number of trips and mileage required to complete the required construction activities, potential for significant impacts from VMT. Emergency access would remain unaffected by the project.

(c) – Less Than Significant Impact: The project includes a condition of approval requiring that the sign copy be restricted and limited to avoid any movement that could distract motorists. Consistent with the requirements of section 314-87.3.3.1 of the Zoning Regulations, the condition prohibits use of electronic or projection screens or use of decals that shimmer, rotate, revolve, twirl, or move in the wind or by electronic means. No changes of this sort are proposed under the current project.

Mitigation Measures: No mitigation required.

Findings: The project would have a **less than significant impact** on transportation/traffic.

3.2.18. Tribal Cultural Resources

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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register or historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	☐	☒	☐

b) 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Discussion

(a)-(b) – Minimal ground disturbance will be necessary to complete the required repairs to the existing sign. Six damaged posts are proposed to be removed and replaced with new ones of identical size. Holes will be 18 inches in diameter, dug in the same location as the existing posts being replaced, and of comparable depth to the original holes dug for the structure –36 inches and 60 inches. A standard informational note is included with the project conditions of approval which describes the steps that must be taken in the unlikely event that tribal cultural resources are encountered during ground disturbing activities. The Tribal Historic Preservation Officer (THPO) from the Wiyot Tribe and Bear River Band of the Rohnerville Rancheria have both been contacted and provided feedback on the project, indicating that the project location has a low possibility for containing tribal cultural resources. Both THPO's have indicated that they support the project proceeding as proposed.

Mitigation Measures: No mitigation required.

Findings: The project would have **a less than significant impact** on tribal cultural resources.

3.2.19. Utilities and Service Systems

Would the project:	Potentially 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?	☐	☐	☐	☒

Discussion

(a)-(e) – No impact: The project will involve repairs to an existing billboard. The project involves repairs to a billboard structure that is already party of the environmental baseline at the site. It is unlikely to result in the need for relocation or construction of new infrastructure for providing public services. No water use will result from implementation of the project nor will it result in any additional demand for wastewater treatment. Damaged wooden supports and will be removed from the site and shouldn't generate more than one or two pickup loads worth of solid waste. Repairing damage to an existing structure generates far less solid waste than proposals where removal and/or reconstruction would otherwise be necessary.

Mitigation Measures: No mitigation required.

Findings: The project would have **no impact** on utilities and service systems.

3.2.20. 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?	☐	☐	☐	☒

Discussion

(a) - (d) – No impact: The project involves repairs to an existing billboard. The project is located in an area with very low risk of fire hazard. The closest areas of State Responsibility for Fire Protection are located over approximately ½-mile south and west of the project. The billboard is located only 60 feet from the Elk River, a tidally influenced waterbody.

Mitigation Measures: No mitigation required.

Findings: The project would have **no impact** on Wildfire.

3.2.21. 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 degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☐	☐	☒
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion

(a) – Less than significant impact: As documented in this Initial Study, the project would not substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory.

(b) – No impact: The project includes repair of a structure that is part of the environmental baseline. Review of historical photos of the area shows that there has been a net reduction in billboards in the time since this sign was constructed. Given the zoning of most lands adjacent to this stretch of Highway 101 do not qualify for new off-site billboard advertising, potential for future cumulative impacts is highly unlikely.

(c) – Less than significant impact: No evidence for significant direct or indirect impacts with the potential to cause substantial adverse effects on human beings were identified for this project.

Mitigation Measures: No mitigation required.

Findings: The project would have **a less than significant impact** on any mandatory findings of significance.

3.2.22. Discuss of Mitigation Measures, Monitoring, and Reporting Program

Mitigation Measures, Monitoring, and Reporting Program (MMRP)

All of the following mitigation measures are required to mitigate impacts from the proposed project to repair the damaged billboard.

Mitigation Measure 1.

AES-1: Sign lighting is prohibited.

Timing for Implementation/Compliance: Immediate upon project approval

Person/Agency Responsible for Monitoring: Applicant / Humboldt County Planning & Building Department (HCP&BD)

Monitoring Frequency: Confirmation that no electrical is in use during final of building permit.

Evidence of Compliance: Observation during evening hours that sign is not illuminated. Installation of signage will be grounds for permit revocation or modification.

Mitigation Measure 2.

BIO-1: Post hole digging and installation may only occur on days where the daytime high tide is 5.5 feet or less.

Timing for Implementation/Compliance: During repair activities following issuance of building permit.

Person/Agency Responsible for Monitoring: Applicant / Humboldt County Planning & Building Department (HCP&BD)

Monitoring Frequency: During repair activities following issuance of building permit.

Evidence of Compliance: Following issuance of building permit, applicant to provide planning staff with a schedule for completion of repair activities. Schedule will be checked against tide data from NOAA prior to authorization by planning. To document compliance, timestamped photos shall be provided to the Planning & Building Department following completion of all repair work.

Mitigation Measure 3.

WQ-1: During repair and reconstruction activities, new materials shall exclusively feature resistant lumber that has been structurally graded, such as Cedar, Redwood or similar woods that are naturally durable. Metal supports may be substituted where featuring similar durability. Use of pressure-treated wood is prohibited.

Timing for Implementation/Compliance: materials list shall be provided to the Planning & Building Department for review prior to building permit issuance.

Person/Agency Responsible for Monitoring: Applicant / Humboldt County Planning & Building Department (HCP&BD)

Monitoring Frequency: New materials will be verified by the building inspector during inspection of sign repair work.

Evidence of Compliance: Documentation will include photographs taken during building permit inspection.

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5. Appendices

5.1. Reconstruction Plan

Reconstruction Plan

Construction and reconstruction of billboards is performed by a 3-5 man crew and is expected to take 2-4 days. No construction equipment is needed. We use shovels and post hole diggers for the post, battery powered hand tools, ladders, and clamps, bolts and screws. No temporary structures or materials are required to reconstruct, IE we do not need to build scaffolding or set temporary brace post of any kind.

Below is a general workflow for how this location will be repaired.

1. Crews will began demoing all non-reusable elements of the structure. This consist of using sawzalls to cut wood into sizes we are able to carry. Once small enough to carry all non-usable elements are stacked in a pile on the shoulder of the highway behind the guardrail.

2. Once all non-usable parts are removed we will begin repairing the structure. A number of the vertical supports for the billboard actually broke about 8' up the post. In these cases, the vertical uprights will be reused. Six (6) of the damaged posts will need to be replaced with new wooden framing. Three (3) of the posts to be replaced are main vertical supports (4x6) and the other three (3) posts (2x6) tie to horizontal bracing at the rear of the billboard. Holes for the six (6) new posts will be 18 inches wide and dug within the same location as the holes for the damaged supports they are replacing. Holes for the three (3) new main vertical supports will be 5 feet deep and holes for the three (3) new rear brace supports will be 3 feet deep. Concrete will be poured into each hole during installation of the six (6) new posts.

3. Once all post holes are dug we set new upright in holes and hand mix bags of concrete into each hole one bag at a time.
4. Once all posts are set you connect main post to back brace post.
5. Run new horizontal stringers connecting all main posts.
6. Mount front and rear catwalks.
7. Sheet face with plywood
8. Install new billboard wrap

5.2. Best Management Practices

Best Management Practices

As already outlined above, the repair and maintenance of a billboard structure has a very minimal impact as it is just a few people working with hand tools.

No gas-powered construction equipment is used so there is nothing to spill.

All new materials are stacked on the shoulder of the highway behind the guardrail until they are needed.

Construction debris only consist of empty bags of concrete and off cuts of wood, once created all bags are put into a trash bag and all off cuts are stacked on the shoulder of the highway until they are loaded up.

Soil from post holes will be minimal. During excavation of the new holes, care will be taken to ensure no spoils are deposited within nearby wetland habitat. All spoils will be staged in buckets before being removed from the site.