



Katherine Schaefer  
Planning Manager  
Community Development Department  
300 Seminary Avenue  
Ukiah, CA, 95482

October 8, 2024

**Subject:** Response to CEQA Comments on the Great Redwood Trail - Ukiah (Phase 4) – Initial Study and Mitigated Negative Declaration (SCH# 2024081302)

Pursuant to CEQA, lead agencies are required to consult with public agencies having jurisdiction over a proposed project and provide the general public with an opportunity to comment on the Draft ISMND.

On August 29, 2024, the City of Ukiah circulated a Notice of Intent (NOI) for a 30-day period to identify potential significant environmental effects if the project were to be implemented. The NOI was e-mailed or otherwise provided to public agencies, the CEQA State Clearinghouse, as well as organizations and individuals considered likely to be interested in the project and its potential impacts. The NOI was also posted on the City of Ukiah's CEQA website and made available at the Ukiah Civic Center.

This Response to Comments consists of the following replies to the California Department of Fish and Wildlife (CDFW), as well as representatives of the Great Redwood Trail Agency (GRTA). Responses to the Northwest Information Center at Sonoma State University, the California Native American Heritage Commission, and Pacific Gas and Electric Company were not required given the Project's incorporation of regulations, permits, outreach attempts, and safety protocols. Please see below for more information:

**Great Redwood Trail Agency (GRTA) – Staff Response (June 11, 2024) – Exhibit A**

GRTA Comments in *italics*

1. *Plan calls to remove the RR Signal Cabinet (CIL) at Commerce Drive. The removal of any GRTA property shall be approved and coordinated with GRTA*
  - Agreed. Please advise on steps on process or removal.
  
2. *There is a fiber optic line under much of the project. Has the owner of the utility reviewed the plans?*
  - Utility companies will be notified to mark their utilities during preconstruction efforts. Any utilities that are in conflict with the trail plans will be remediated with the City Engineer.

3. *What is the need for the water tanks at approx. Sta. 404+50, 414+20 and 417+50?*
  - These water tanks are for irrigation purposes in providing water to the native plants that are planned for installation during construction and after by volunteer groups. The City of Ukiah will supply and provide the water.
  
4. *Trail plan states that there may be areas that require slight shift of plans for preservation of existing trees. What type of tree protection will be used? Is there an Arborist Report?*
  - There is no arborist report. Tree protection will be on a case-by-case basis in coordination with the Resident Engineer.
  
5. *There are a total of 9 trees that are marked with an X which the plans indicate as tree removal. Are any of these possible to save?*
  - The original plan called for the removal of nearly 40 trees. After City/community review and several field walks, these trees were agreed to be eliminated. Had railbanking been facilitated by the CUPC, no tree removal would be required.
  
6. *Does the ramp and stairs to Panda Express at Sta. 406+00 lead to a public walkway?*
  - Yes. The City has an access easement with the property owner and made their site development conditional on granting such trail access to the public.
  
7. *Plan typical section number callouts are the same on 3 plan sheets. This is confusing.*
  - No response.
  
8. *On Sheet C-108 how is the fill constructed around the new 48" CMP extensions? Are there permits we can review? Same questions for the 24" CMP extension.*
  - Refer to C-108 and detail C-503 "Rock Slope Protection". The project has an approved permit with California Department of Fish and Wildlife under notification no. EPIMS-MEN-32359-R1C that can be reviewed upon arranged request.
  
9. *Where are the outlets for the drainage handled for trail segments that have a drainage ditch between RR embankment and trail?*
  - It's unclear which area this question is referring to, but all areas of the trail will be properly graded to drain away from both the tracks and trail.

10. *Is Airport Park Blvd still closed? If so, will it continue to be closed? If it is to be reopened what safety measures would be implemented?*

- Airport Road is still closed. Signage and pedestrian safety including an ADA crosswalk across. Airport Road will be constructed with the anticipation of the road being reopened. See sheet C-402.

11. *Sheet C-113 calls out wetland grading on the opposite side of the tracks. Is this required as mitigation? If so, please provide details of the requirement*

- This wetland mitigation is required and detailed both in the project specifications and North Coast Regional Water Quality Control Board permit ECM PIN CW-882169; WDIID 1B22090WNME.

12. *Trail Profile is lacking top of rail profile.*

- No Response

13. *There is approximately 575 ft of existing linear encroachment along GRTA's east right-of-way. These encroachments coincide with trail stationing from Sta. 471+25 to 477+00. The plans provide how the Ukiah Animal Shelter 330 ft of encroachment is addressed only (See comment 14).*

- No Response

14. *How will the additional 245 ft of encroachments be addressed? There is a well-used dirt roadway assumed for vineyard overlapping the planned trail.*

- All the vineyards in question are owned by the City of Ukiah and all contractors employed at those locations are under contract with the City of Ukiah. The animal shelter is in negotiations to move and the City is in coordination with the County on future use of this property. Project plans do not interrupt current operations of this facility.

15. *The trail ends at Plant Road. The track crossing at this location is in very poor condition, as is the road itself are there plans to improve these conditions? (see below photo).*

- This road is outside the project scope and belongs to Mendocino County and not within the City of Ukiah's pavement rehabilitation program. As a terminus to the trail, the project will provide crosswalk striping within the roadway and an ADA ramp for future connections. See sheet C-404.

16. *Sheet C-121 and C-122 (“Drainage Plan 1 & 2”) have five plans that indicate the railroad embankment requires regrading at these locations. Cross sections show catch points with line to edge of trail indicating all drainage of RR embankment drains onto trail?*

- Any drainage from the RR running across the trail will continue in slope across and off the trail as shown at 1.5%

17. *Erosion Control. There are areas where the RR embankment slope is without erosion control. Example Sta. 441+20 below:*

- Any area disturbed will have erosion control unless not allowed by State regulatory permits.

18. *All existing RR signage is to remain. If RR signage or striping is to be removed or replaced, GRTA approval is required. No track modification or removal is allowed.*

- Agreed. Please advise on steps on process or removal.

19. *Airport Park Blvd. and Commerce Dr. do not have S2 signage (RECTANGULAR RAPID FLASHING BEACON). This seems inconsistent with other crossings on the trail.*

- Because of the grant funding, this type of improvement was limited.

### **Great Redwood Trail Agency (GRTA) – Staff Response (September 27, 2024) – Exhibit B**

GRTA Comments/Questions in *italics*

1. *The stairways at the north end (near Commerce Drive- at Panda Express and Holiday Inn parking lot) need to be tied into their associated parking areas in a way that is safe and supports pedestrians and bicyclists. Please explain how the GRT will safely tie into these two parking areas.*

- The City has an access easement with the property owner and made their site development conditional on granting such trail access to the public.

2. *Are the water tanks shown on the Phase 4 plans for irrigating plantings associated with the GRT?*

- These water tanks are for irrigation purposes in providing water to the native plants that are planned for installation during construction and after by volunteer groups. The City of Ukiah will supply and provide the water.

3. *Do you know how deep the existing fiberoptic cable is buried in GRTA’s ROW?*

- Utility companies will be notified to mark their utilities during preconstruction efforts. Any utilities that are in conflict with the trail plans will be remediated with the City Engineer.
4. *Are there plans to eventually open Airport Road and connect to Airport Park Blvd. (where there is currently a gate)?*
- Airport Road is still closed. Signage and pedestrian safety including an ADA crosswalk across Airport Road will be constructed with the anticipation of the road being reopened. See sheet C-402.
5. *The Norgaard/Highway 101 underpasses have buried fiberoptic cable, drainage ditches, etc. - it appeared to GRTA staff that the best location for the GRT in this area would be **west** of the railroad tracks; however, it appears the plans show the GRT east of the tracks. We'd like to walk this section with City staff asap to confirm the plans for the GRT, as there is a lot going on in this area.*
- This wetland mitigation [at this location and detailed on Sheet C-113] is required and detailed both in the project specifications and North Coast Regional Water Quality Control Board permit ECM PIN CW-882169; WDID 1B22090WNME. Staff is open to any requested evaluation or site visit to the areas planned for the GRT – Ukiah (Phase 4).
6. *North of Taylor Drive and Plant Road, there are Mendocino County Animal Control-associated encroachments into GRTA ROW, as well as fencing, and vineyards on GRTA property. What are the plans for addressing these encroachments as part of the Phase 4 GRT project? We'd like to walk this area with City staff as well, to review the issues and Phase 4 plans.*
- All the vineyards in question are owned by the City of Ukiah and all contractors employed at those locations are under contract with the City of Ukiah. The animal shelter is in negotiations to move and the City is in coordination with the County on future use of this property. Project plans do not interrupt current operations of this facility. Staff is open to any requested evaluation or site visit to the areas planned for the GRT – Ukiah (Phase 4).

**NAHC – Public Comment (August 12, 2024) – Exhibit C**

No Response

**SSU-NWIC – Public Comment (August 27, 2024) – Exhibit D**

No Response

**California Department of Fish & Wildlife (August 27, 2024) – Exhibit E**

CDFW Comments and Recommendations in *italics*

### ***I. Environmental Setting and Related Impact Shortcoming***

*The draft MND does not include an analysis of potential impacts to listed species, Species of Special Concern, rare plants, riparian habitat or other Sensitive Natural Communities. The Project's identification and analysis of potential impacts to these resources was informed by an Aquatic Resources and Wetland Delineation Report. This report did not include floristic survey results, and the survey documented was conducted outside the blooming period for most plant species with the potential to occur. Within a half mile of the Project, the California Natural Diversity Database (CNDDDB) documents occurrences of Baker's Meadowfoam (*Limnanthes bakeri*), a State-listed species with a California Plant Rank of 2.B1.*

***CDFW Recommendation 1:*** *Adequate biological surveys should be conducted at the appropriate time of year to determine whether rare plants, Sensitive Natural Communities, and Species of Special Concern or their habitat are present.*

- While it is acknowledged that Biological Surveys and floristic surveys can provide substantial evidence to support conclusions about potential impacts, there is no explicit requirement that an ISMND must include these studies. This ISMND has provided substantial evidence to support its findings on impacts to Biological Resources, specifically to listed species, Species of Special Concern, rare plants, riparian habitat or other Sensitive Natural Communities via queries into the California Natural Diversity Database (CNDDDB) Rare Find, and the California Native Plant Society (CNPS) Inventory of Rare Plants, along with adherence to the mitigation measures from the California Department of Fish and Wildlife Lake and Streambed Alteration Agreement (Appendix F), the Aquatic Resources and Wetland Delineation Report (Appendix B), and the North Coast Regional Water Quality Control Board (NCRWQCB) Water Quality Certification (Appendix E).
- In addition, as referenced in Appendix D (Special Provisions) and Appendix G (Avoidance and Minimization Measures), and as conditioned in the ISMND and the NRCWQCB Water Quality Certification (Appendix E), to ensure no impacts to listed species, Species of Special Concern, rare plants, riparian habitat or other Sensitive Natural Communities occur, a qualified biologist shall conduct environmental awareness training for Project contractors prior to initiation of construction. Though no significant impacts on Baker's meadowfoam or other listed species or habitat are anticipated with adherence to existing project design and mitigation measures, the incorporation of Baker's meadowfoam will be recommended for inclusion in the training and review.

***CDFW Recommendation 2:*** *If Baker's meadowfoam or other listed species or associated habitat is identified within the Project area, and potential impacts to these species are unavoidable, consult with CDFW to seek the appropriate take authorization for species listed under the Native Plant*

Protection Act (Fish & G. Code, § 1904) or the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.).

- With Project design and mitigation measures, a take is not anticipated.

## **II. Mitigation Measure or Alternative and Related Impact Shortcoming**

**Issue 1:** *The Project proposes to remove “trees and other natural vegetative features” (page 24) along the trail alignment, but the species or their natural communities are not identified. The Project proposes revegetation and restoration activities, which include natural regeneration along the trail alignment and planting trees and shrubs within riparian zones to enhance water quality and habitat (page 27).*

**CDFW Recommendation 3:** *Revise Mitigation Measure BIO-2 and BIO-4 to require Project revegetation and enhancement plans identify the species and natural community proposed for removal, and propose a planting palette comprised of the appropriate native tree and shrub species that are suitable for that natural community.*

- From the Project’s “Special Provisions for the Great Redwood Trail Phase 4” (Appendix D), the Project has been designed to adhere to a Planting Plan, which identifies the species to be removed and introduced (incl. valley oak, common manzanita, ceanothus, and toyon). In addition, Appendix A (Phase 4 GRT – Ukiah Plan Sheets) identifies the location and species of each tree to be removed. The Project will also need to adhere to the City of Ukiah’s Tree Management Guidelines and will be facilitated by Community Services staff and horticulturalists in conjunction with contracted arborists. Appendix G (Avoidance and Minimization Measures) provides the incorporated project requirement that a qualified wetland biologist/ecologist shall monitor the revegetation and restoration activities for up to three years or until the graded areas match the vegetation density of the existing wetland and are dominated by wetland plants. The existing wetland will be used as a benchmark for determining density. If it is determined after year one of monitoring that the vegetation is not progressing at a satisfactory rate to support a functional wetland, the area will be considered for reseeding or plugs (pg. 5). A proposed Wetland Seed Mix table, identifying species and quantity is also included in the analysis. This requirement is also echoed in the ‘Project-Specific Conditions’ of the NCRWQCB Water Quality Certification (Appendix E). As revegetation and enhancement plans are already embedded into the Project’s design, revisions to Mitigation Measure BIO-2 and BIO-4 are not warranted.

**Exhibit A:** GRTA – Public Comment Dave Anderson (June 11, 2024); **Exhibit B** (GRTA – Public Comment Louisa Morris (September 27, 2024); **Exhibit C:** NAHC – Public Comment (August 12, 2024); **Exhibit D:** SSU-NWIC – Public Comment (August 27, 2024); **Exhibit E:** CDFW – Public Comment (August 27, 2024)

# MEMORANDUM

Date: June 11, 2024

To: Elaine Hogan, GRTA Executive Director

From: Dave Anderson, PE

Re: Ukiah Phase 4 review Comments/Questions

- 
- 1) Plan calls to remove the RR Signal Cabinet (CIL) at Commerce Drive. The removal of any GRTA property shall be approved and coordinated with GRTA.



- 2) There is a fiber optic line under much of the project. Has the owner of the utility reviewed the plans?
- 3) What is the need for the water tanks at approx. Sta. 404+50, 414+20 and 417+50?
- 4) Trail plan states that there may be areas that require slight shift of plans for preservation of existing trees. What type of tree protection will be used? Is there an Arborist Report?
- 5) There are a total of 9 trees that are marked with an X which the plants indicate as tree removal. Are any of these possible to save?
- 6) Does the ramp and stairs to Panda Express at Sta. 406+00 lead to a public walkway?
- 7) Plan typical section number callouts are the same on 3 plan sheets. This is confusing.



- 8) On Sheet C-108 how is the fill constructed around the new 48" CMP extensions? Are there permits we can review? Same questions for the 24" CMP extension.
- 9) Where are the outlets for the drainage handled for tail segments that have a drainage ditch between RR embankment and trail?
- 10) Is Airport Park Blvd still closed? If so, will it continue to be closed? If it is to be reopened what safety measures would be implemented?

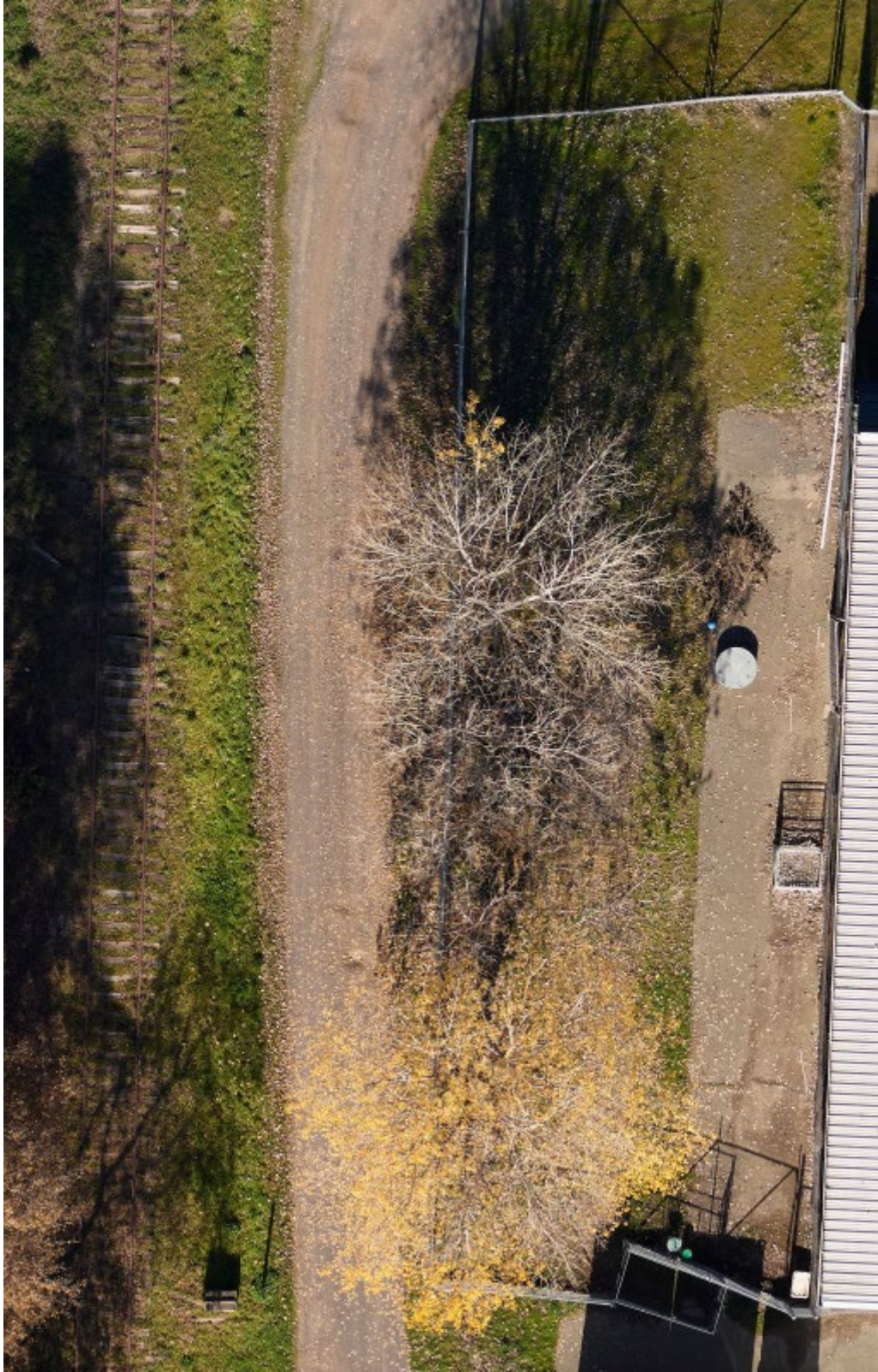


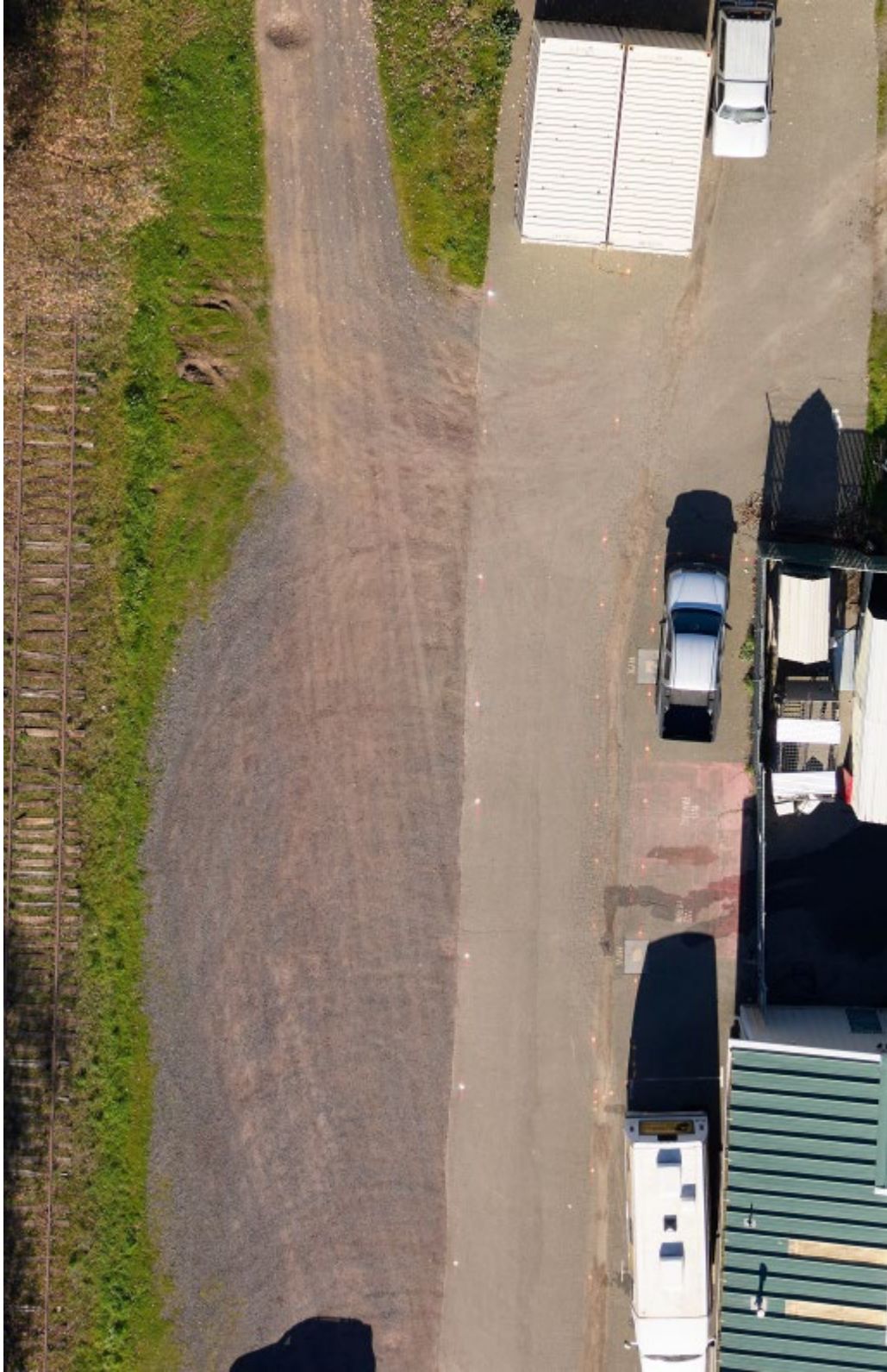
- 11) Sheet C-113 calls out wetland grading on the opposite side of the tracks. Is this required as mitigation? If so, please provide details of the requirement.
- 12) Trail Profile is lacking top of rail profile.
- 13) There is approximately 575 ft of existing linear encroachment along GRTA's east right-of-way. These encroachments coincide with trail stationing from Sta. 471+25 to 477+00. The plans provide how the Ukiah Animal Shelter 330 ft of encroachment is addressed only (See comment 14).
- 14) How will the additional 245 ft of encroachments be addressed? There is a well-used dirt roadway assumed for vineyard overlapping the planned trail.

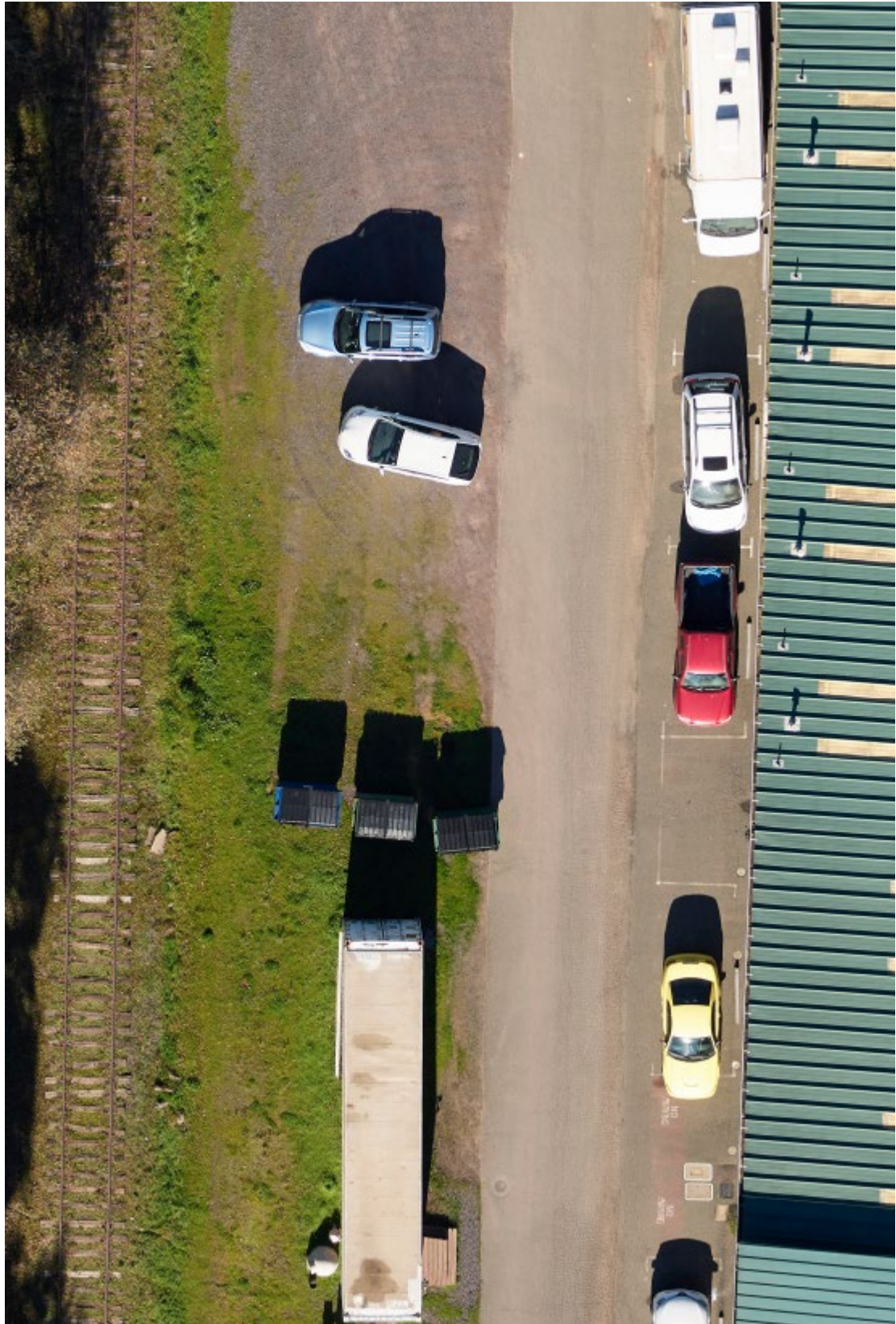
Below is an overall Google Earth view of the area of encroachment. A detailed series of 6 aerial photos follow showing the 575 ft of encroachments. **The photos start at the north end and overlap going south:**













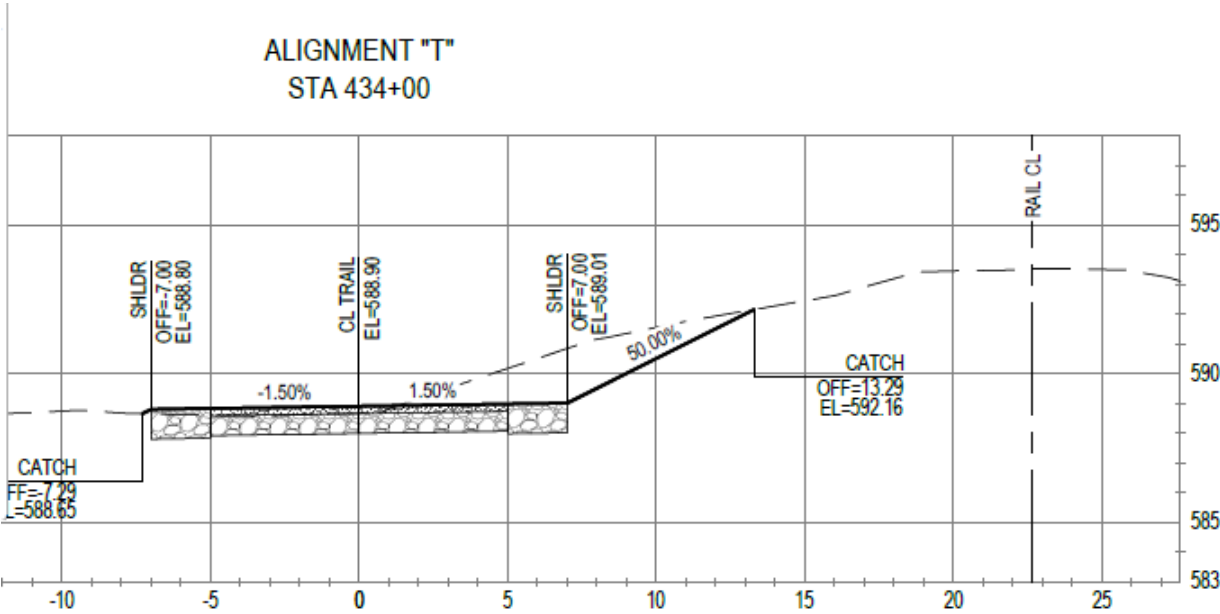




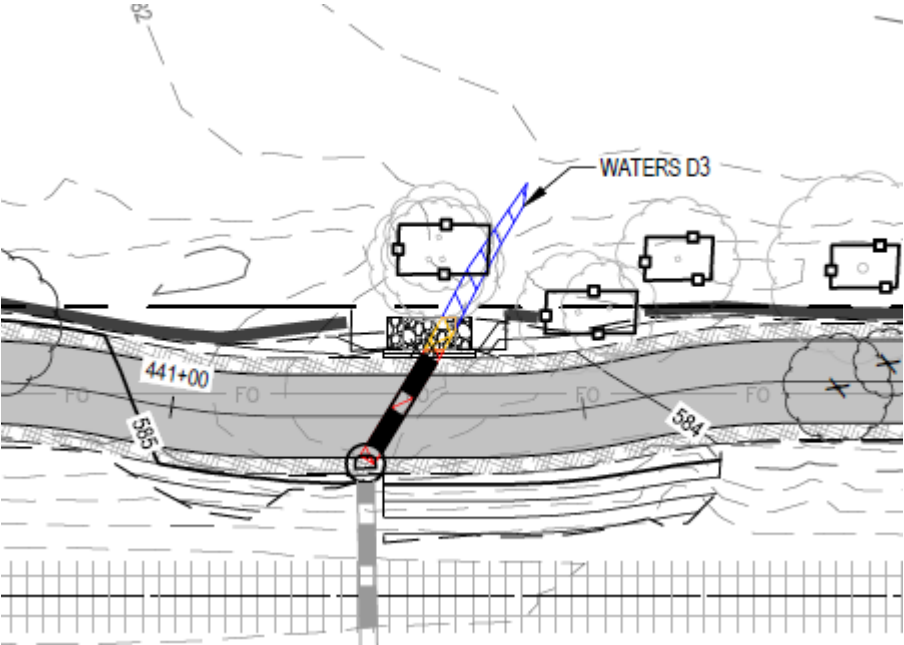
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17) Erosion Control. There are areas where the RR embankment slope is without erosion control.  
Example Sta. 441+20 below:



18) All existing RR signage is to remain. If RR signage or striping is to be removed or replaced, GRTA approval is required. No track modification or removal is allowed.

19) Airport Park Blvd. and Commerce Dr. do not have S2 signage (RECTANGULAR RAPID FLASHING BEACON). This seems inconsistent with other crossings on the trail.

**From:** [Morris, Louisa@SCC](mailto:Morris.Louisa@SCC)  
**To:** [Katherine Schaefer](#); [Jesse Davis](#)  
**Cc:** [Elaine Hogan](#)  
**Subject:** GRTA comments on GRT Ukiah Phase 4 MND/plans  
**Date:** Friday, September 27, 2024 9:33:01 AM  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
**Importance:** High

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**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Katherine and Jesse,

Here are GRTA's additional comments/questions on the Phase 4 GRT-Ukiah designs and MND:

1. The stairways at the north end (near Commerce Drive- at Panda Express and Holiday Inn parking lot) need to be tied into their associated parking areas in a way that is safe and supports pedestrians and bicyclists.
  - Please explain how the GRT will safely tie into these two parking areas.
2. Are the water tanks shown on the Phase 4 plans for irrigating plantings associated with the GRT?
3. Do you know how deep the existing fiberoptic cable is buried in GRTA's ROW?
4. Are there plans to eventually open Airport Road and connect to Airport Park Blvd. (where there is currently a [gate](#))?
5. The Norgaard/Highway 101 underpasses have buried fiberoptic cable, drainage ditches, etc. - it appeared to GRTA staff that the best location for the GRT in this area would be **west** of the railroad tracks; however, it appears the plans show the GRT east of the tracks.
  - We'd like to walk this section with City staff asap to confirm the plans for the GRT. as there is a lot going on in this area.
6. North of Taylor Drive and Plant Road, there are Mendocino County Animal Control-associated encroachments into GRTA ROW, as well as fencing, and vineyards on GRTA property.
  - What are the plans for addressing these encroachments as part of the Phase 4 GRT project?
  - We'd like to walk this area with City staff as well, to review the issues and Phase 4 plans.

Thank you! We are excited to work with you to make this next phase of the GRT happen.

Best,

Louisa

Louisa Morris, Project Manager

Great Redwood Trail

State Coastal Conservancy | [www.scc.ca.gov](http://www.scc.ca.gov)

1515 Clay Street, Suite 1000, Oakland 94612

Phone: 510-286-4185

## NATIVE AMERICAN HERITAGE COMMISSION

August 12, 2024

Katherine Schaefers  
City of Ukiah

Via Email to: [KSchaefers@cityofukiah.com](mailto:KSchaefers@cityofukiah.com)

**Re: Native American Consultation, Pursuant to Senate Bill 18 (SB18), Government Codes §65352.3 and §65352.4, as well as Assembly Bill 52 (AB52), Public Resources Codes §21080.1, §21080.3.1 and §21080.3.2, Great Redwood Trail - Ukiah (Phase 4) Project, Mendocino County**

Dear Ms. Schaefers:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties or projects.

Government Codes §65352.3 and §65352.4 require local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans and Community Plans.

Public Resources Codes §21080.3.1 and §21080.3.2 requires public agencies to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to tribal cultural resources as defined, for California Environmental Quality Act (CEQA) projects.

The law does not preclude local governments and agencies from initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction. The NAHC believes that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

Best practice for the AB52 process and in accordance with Public Resources Code §21080.3.1(d), is to do the following:

*Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.*

The NAHC also recommends, but does not require that lead agencies include in their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential affect (APE), such as:



CHAIRPERSON  
**Reginald Pagaling**  
Chumash

VICE-CHAIRPERSON  
**Buffy McQuillen**  
Yokayo Pomo, Yuki,  
Nomlaki

SECRETARY  
**Sara Dutschke**  
Miwok

PARLIAMENTARIAN  
**Wayne Nelson**  
Luiseño

COMMISSIONER  
**Isaac Bojorquez**  
Ohlone-Costanoan

COMMISSIONER  
**Stanley Rodriguez**  
Kumeyaay

COMMISSIONER  
**Laurena Bolden**  
Serrano

COMMISSIONER  
**Reid Milanovich**  
Cahuilla

COMMISSIONER  
**Bennae Calac**  
Pauma-Yuima Band of  
Luiseño Indians

EXECUTIVE SECRETARY  
**Raymond C.  
Hitchcock**  
Miwok, Nisenan

**NAHC HEADQUARTERS**  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:
  - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE, such as known archaeological sites;
  - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
  - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the APE; and
  - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.
2. The results of any archaeological inventory survey that was conducted, including:
  - Any report that may contain site forms, site significance, and suggested mitigation measures.  
  
All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code Section 6254.10.
3. The result of the Sacred Lands File (SFL) check conducted through the Native American Heritage Commission was positive. Please contact the Pinoleville Pomo Nation on the attached list for more information.
4. Any ethnographic studies conducted for any area including all or part of the potential APE; and
5. Any geotechnical reports regarding all or part of the potential APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event, that they do, having the information beforehand well help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: [Cameron.vela@nahc.ca.gov](mailto:Cameron.vela@nahc.ca.gov).

Sincerely,

*Cameron Vela*

Cameron Vela  
Cultural Resources Analyst

Attachment

CALIFORNIA  
HISTORICAL  
RESOURCES  
INFORMATION  
SYSTEM



ALAMEDA  
COLUSA  
CONTRA COSTA  
DEL NORTE

HUMBOLDT  
LAKE  
MARIN  
MENDOCINO  
MONTEREY  
NAPA  
SAN BENITO

SAN FRANCISCO  
SAN MATEO  
SANTA CLARA  
SANTA CRUZ  
SOLANO  
SONOMA  
YOLO

**Northwest Information Center**  
Sonoma State University  
1400 Valley House Drive, Suite 210  
Rohnert Park, California 94928-3609  
Tel: 707.588.8455  
nwic@sonoma.edu  
<https://nwic.sonoma.edu>

August 27, 2024

File No.: 24-0237

Katherine Schaefers, Planner  
City of Ukiah  
Department of Planning & Community Development  
300 Seminary Avenue  
Ukiah, CA 95482

re: Great Redwood Trail Ukiah - Phase 4/ Commerce Dr (39°07'57"N 123°12'01"W) to Plant Rd (39°06'44"N 123°11'33"W)/ City of Ukiah

Dear Katherine Schaefers,

Records at this office were reviewed to determine if this project could adversely affect cultural resources. Please note that use of the term cultural resources includes both archaeological sites and historical buildings and/or structures. The review for possible historic-era building/structures, however, was limited to references currently in our office and should not be considered comprehensive.

**Project Description:**

Phase 4 implementation of Ukiah's Great Redwood Trail. The project (Phase 4 in attached "GRT Phasing Map") is located within an inactive 1.9-mile segment of railroad corridor/right-of-way subject to the jurisdiction of the Great Redwood Trail Agency. The project will provide a Class 1 walking and biking facility from the existing southern terminus of the Great Redwood Trail in Ukiah at Commerce Drive (39°07'57"N 123°12'01"W) to existing municipal facilities at Plant Road (39°06'44"N 123°11'33"W) that will be improved to feature a small parking area and trailhead with seating and recreational amenities.

**Previous Studies:**

XX This office has record of the below previous cultural resource studies by a professional archaeologist or architectural historian for portions of the proposed project area (*see recommendation below*):

Report No	Authors	Year	Title
S-000680	Thomas L. Jackson	1977	Archaeological Reconnaissance of the Proposed Ukiah Wastewater Facilities Improvements, Ukiah, California
S-013223	Thomas M. Origer	1991	An Archaeological Survey of the Redwood Business Park, South of Ukiah, Mendocino County, California
S-022729	Lynn Compas	2000	Cultural Resources Inventory for the California Department of Forestry and Fire Protection, Ukiah Air Attack Base Relocation Project, Mendocino County, California
S-026863	Allen G. Pastron and Jonathan Goodrich	2003	Phase I Cultural Resources Evaluation of the Wastewater Treatment Plant Improvement Project Area, Located in the City of Ukiah, Mendocino County, California
S-033268	Paula Boghosian	1985	Architectural and Historical Resources Inventory Report, Ukiah, California
S-036144	Wesley Wills	2009	A Cultural Resources Study for the Recycled Water and Stormwater Development Project in the City of Ukiah, Mendocino County, California
S-051012	Gina Caretti and Courtney Higgins	2018	Cultural Resources Monitoring for the Redwood Fire, Mendocino County, California

**Archaeological and Native American Resources Recommendations:**

XX The proposed project area has the possibility of containing unrecorded archaeological sites. Due to the lack of full coverage, combined with passage of time since the previous surveys and the changes in archaeological theory and method since that time, we recommend a qualified archaeologist conduct further archival and field study for the entire project area to identify any unrecorded archaeological resources.

XX We recommend the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values. For a complete listing of tribes in the vicinity of the project, please contact the Native American Heritage Commission at 916/373-3710.

     The proposed project area has a low possibility of containing unrecorded archaeological site(s). Therefore, no further study for archaeological resources is recommended.

**Built Environment Recommendations:**

XX The proposed project area contains, or is directly adjacent to P-23-003663, the Northwestern Pacific Railroad. Prior to commencement of project activities, it is recommended that this resource be assessed by a qualified professional familiar with the architecture and history of Mendocino County.

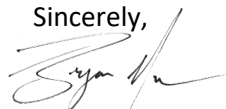
XX Since the Office of Historic Preservation has determined that any building or structure 45 years or older may be of historical value, if the project area contains such properties, it is recommended that prior to commencement of project activities, a qualified professional familiar with the architecture and history of Mendocino County conduct a formal CEQA evaluation.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

For your reference, a list of qualified professionals in California that meet the Secretary of the Interior's Standards can be found at <http://www.chrisinfo.org>. If archaeological resources are encountered during the project, work in the immediate vicinity of the finds should be halted until a qualified archaeologist has evaluated the situation. If you have any questions please give us a call (707) 588-8455.

Sincerely,



Bryan Much  
Coordinator



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Northern Region  
601 Locust Street  
Redding, CA 96001  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



September 27, 2024

Katherine Schaefer  
Planning Manager  
City of Ukiah - Community Development Department  
300 Seminary Avenue  
Ukiah, CA 95482  
[kschaefer@cityofukiah.com](mailto:kschaefer@cityofukiah.com)

**SUBJECT: GREAT REDWOOD TRAIL - UKIAH (PHASE 4), MITIGATED NEGATIVE DECLARATION, STATE CLEARINGHOUSE NUMBER: 2024081302**

Dear Katherine Schaefer:

The California Department of Fish and Wildlife (CDFW) received a notice of a draft Initial Study and Mitigated Negative Declaration (MND) for the City of Ukiah's Phase 4 Great Redwood Trail Project (Project) on August 29, 2024.

### **CDFW ROLE**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW may need to exercise regulatory authority as provided by the Fish and Game Code. For example, the Project is subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.) and a Lake or Streambed Alteration Agreement has been issued. Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the

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California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

## **PROJECT DESCRIPTION SUMMARY**

The City of Ukiah (City) proposes to construct a 1.9-mile segment of the Great Redwood Trail (GRT) within the City that would connect the existing southern terminus of the GRT at Commerce Drive south, to the City's existing facilities at Plant Road. Project implementation will include construction of a 10-foot-wide paved trail with a 2-foot-wide gravel shoulder on either side of the trail. The Project will include pedestrian access points, a new trailhead, two new pedestrian and bike bridges, and three culvert extensions at existing water crossings. Construction will include earthmoving equipment including graders, bulldozers, excavators, cranes and trucks to remove excavated soil and supply asphalt and concrete.

### **Location:**

The Project is located within the City of Ukiah and unincorporated areas of Mendocino County along an inactive 1.9-mile segment of railroad corridor between Commerce Drive to the north, and Plant Road to the south.

## **COMMENTS AND RECOMMENDATIONS**

CDFW offers the following comments and recommendations to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

### **I. Environmental Setting and Related Impact Shortcoming**

The draft MND does not include an analysis of potential impacts to listed species, Species of Special Concern, rare plants, riparian habitat or other Sensitive Natural Communities. The Project's identification and analysis of potential impacts to these resources was informed by an Aquatic Resources and Wetland Delineation Report. This report did not include floristic survey results, and the survey documented was conducted outside the blooming period for most plant species with the potential to occur. Within a half mile of the Project, the California Natural Diversity Database (CNDDDB) documents occurrences of Baker's Meadowfoam (*Limnanthes bakeri*), a State-listed species with a California Plant Rank of 2.B1.

**CDFW Recommendation 1:** Adequate biological surveys should be conducted at the appropriate time of year to determine whether rare plants, Sensitive Natural Communities, and Species of Special Concern or their habitat are present.

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**CDFW Recommendation 2:** If Baker's meadowfoam or other listed species or associated habitat is identified within the Project area, and potential impacts to these species are unavoidable, consult with CDFW to seek the appropriate take authorization for species listed under the Native Plant Protection Act (Fish & G. Code, § 1904) or the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.).

## II. Mitigation Measure or Alternative and Related Impact Shortcoming

### Issue 1:

The Project proposes to remove "trees and other natural vegetative features" (page 24) along the trail alignment, but the species or their natural communities are not identified. The Project proposes revegetation and restoration activities, which include natural regeneration along the trail alignment and planting trees and shrubs within riparian zones to enhance water quality and habitat (page 27).

**CDFW Recommendation 3:** Revise Mitigation Measure BIO-2 and BIO-4 to require Project revegetation and enhancement plans identify the species and natural community proposed for removal, and propose a planting palette comprised of the appropriate native tree and shrub species that are suitable for that natural community.

## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

## ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

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## CONCLUSION

CDFW appreciates the opportunity to comment on the draft MND to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jennifer Garrison, Senior Environmental Scientist (Specialist) at (707) 477-7792 or [Jennifer.Garrison@wildlife.ca.gov](mailto:Jennifer.Garrison@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
1D82ADE7303A474...

Tina Bartlett, Regional Manager  
Northern Region

ec: State Clearinghouse  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

Rebecca Garwood, Angela Liebenberg, Jennifer Garrison  
California Department of Fish and Wildlife

Katherine Schaefer, Planning Manager  
City of Ukiah  
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## **REFERENCES**

California Department of Fish and Wildlife. California Natural Diversity Database. September 13, 2024.

California Department of Fish and Wildlife. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. March 20, 2018.

City of Ukiah. CEQA Initial Study for: Great Redwood Trail – Ukiah (Phase 4) Mitigated Negative Declaration. August 29, 2024

Jane Valerius Environmental Consulting. Aquatic Resources Report/Wetland Delineation of Waters of the United States for the Ukiah Great Redwood Trail Phase 4 Project. March 3, 2022.