

# Chapter 4. Alternatives Analysis

The purpose of the alternatives analysis in an environmental impact report is to describe a range of reasonable alternatives and evaluate their comparative merits. The no-project alternative and action alternatives, including the proposed project, were identified for the Wildwood Road Realignment and Widening Project during project meetings and scoping with federal, state, and local agencies and the public. Alternatives include:

- Alternative 1: Proposed Project, as described in Chapter 2
- Alternative 2: No-Project (continued maintenance but no reconstruction)
- Alternative 3: Major Realignment between Post Miles 6.2 and 7.7
- Alternative 4: Bridge Gulches instead of Filling
- Alternative 5: Spot Improvements
- Alternative 6: Approve One or Two Segments

An evaluation of engineering, economic, and environmental factors resulted in the selection of two alternatives (the proposed project and the no-project alternative) for further analysis. Alternatives 3 through 6 were considered early in the project development process but were eliminated from detailed analysis because they did not meet the purpose and need for the project, their construction would have greater environmental impacts, or they had substantially higher construction costs. After certifying this environmental impact report, the decision-makers could select the proposed project or the no-project alternative for implementation.

The impacts of the proposed project are discussed in detail in Chapter 3. The comparative impacts of the no-project alternative and the various action alternatives, as well as the reasons for dismissing the other alternatives, are discussed below. The environmentally superior alternative is also discussed.

## 4.1 No-Project Alternative

### 4.1.1 Description

Under the no-project alternative, Wildwood Road would not be improved as described for the proposed project. This alternative reflects the current conditions of the road and project area and what would be reasonably expected to occur in the foreseeable future if the project were not built (CEQA Guidelines Section 15126.6(e)(2)). The purpose of evaluating this alternative is to compare the impacts of the alternatives with the impacts that could occur without implementation of the proposed project.

Wildwood Road would not be widened or realigned under the no-project alternative, and existing routine maintenance practices would continue. Maintenance activities would be conducted as needed and as funding becomes available. Periodic maintenance may require minor road improvements to maintain the road in good condition. Temporary lane or road closures may be necessary during these minor projects. Erosion of the cutbanks and fill slopes would continue at the present rate, and roadway conditions would continue to pose hazards to drivers and possibly cause accidents.

Although no immediate costs or construction-related impacts would occur under this alternative, it would not provide a long-term solution for existing safety concerns and would not meet the project objectives.

### **4.1.2 Impact Analysis**

The no-project alternative would result in substantially fewer impacts to the environment than the proposed project due to the minimal construction activities. The longer term impacts, however, would be greater than those of the proposed project because of the ongoing safety, erosion, and water quality issues associated with the road. Without implementation of the major road improvements, the County would fail to implement policies stated in the Circulation Element of the General Plan to “ensure the safe and efficient movement of people and goods.”

#### **Land Use Impacts**

Land uses in the project area would be the same as under current conditions. No activities would be implemented that could conflict with adjacent land uses. Minor improvements to and maintenance of Wildwood Road would take place within the existing easement and would not be expected to conflict with the Shasta-Trinity National Forest Land and Resources Management Plan or Trinity County General Plan.

#### **Agriculture and Forestry Resources Impacts**

Agricultural and forestry uses in and near the project area would be the same as under current conditions. No road modifications would be implemented that could alter these uses or affect land zoned for these uses. Minor improvements to and maintenance of Wildwood Road would take place within the existing easement and would not convert agricultural or forestry lands outside the easement to a roadway or other use.

#### **Transportation and Traffic Impacts**

Without the proposed project, Wildwood Road would continue to provide hazardous conditions for travelers, and the potential for accidents would continue to be relatively high. Minor improvements to and maintenance of Wildwood Road would take place within the existing easement and could result in temporary traffic delays, but they would not restrict or impede access to adjacent lands.

#### **Air Quality Impacts**

Construction emissions would be minimal from minor improvements to or maintenance of Wildwood Road, similar to current conditions. Long-term emissions would also be similar to those under current conditions. Overall air quality impacts would continue to be minimal from mobile source emissions and periodic maintenance or minor improvements along the road and would not be expected to contribute to exceedances of particulate matter (PM10) standards.

## **Noise Impacts**

Construction-related noise would be minimal from minor improvements to or maintenance of Wildwood Road, similar to current conditions. Long-term noise levels would be the same as under current conditions. Overall noise-related impacts would continue to be minimal from vehicle use of Wildwood Road and periodic maintenance or minor improvements along the road and would not be expected to exceed acceptable noise standards near sensitive uses.

## **Biological Resources Impacts**

Construction activities would be limited to minor improvements to or maintenance of Wildwood Road within the existing road easement, similar to current conditions. The ongoing noise and other disturbance associated with traffic and routine maintenance would continue to have minor impacts on special-status animals and other resident species in the vicinity of the road corridor. No new impacts to biological resources would be expected, and habitat conditions would remain similar to current conditions.

## **Cultural Resources Impacts**

Construction activities would be limited to minor improvements to or maintenance of Wildwood Road within the existing road easement, similar to current conditions. Previously undiscovered cultural resources or human remains are not likely to be affected by these activities based on the disturbed nature of the existing easement.

## **Aesthetics Impacts**

Without the proposed project, views along Wildwood Road would be the same as the current views. Minor improvements to Wildwood Road would take place within the existing easement and could temporarily detract from the views, but would not substantially alter the visual character of the area.

## **Hydrology and Water Quality Impacts**

Construction activities would be limited to minor improvements to or maintenance of Wildwood Road within the existing road easement, similar to current conditions. Some of the existing culverts would continue to be undersized for flood flows, and erosion along the road would continue to contribute to sedimentation in Hayfork Creek. The minor improvements could disturb soil along the roadside and discharge pollutants or sediment into the creek, but erosion control measures and best management practices would be expected to minimize these effects.

## **Geology and Soils Impacts**

Construction activities would be limited to minor improvements to or maintenance of Wildwood Road within the existing road easement, similar to current conditions. The minor improvements could disturb soil along the roadside, but erosion control measures and best management practices would be expected to minimize these effects. Existing landslide and slope hazards would not necessarily be reduced without additional slope protection, and safety concerns for travelers along the road would remain.

## **4.2 Alternatives Considered But Eliminated**

Trinity County Department of Transportation considered four alternatives to the proposed project that would entail improvements to portions of Wildwood Road or variations to the improvements identified for the proposed project. These alternatives were not carried forward for more detailed evaluation for the reasons described below.

### **4.2.1 Alternative 3: Major Realignment Between Post Miles 6.2 and 7.7**

Alternative 3 was considered early in the planning stage as an alternate alignment to avoid the extremely steep terrain between Post Miles 6.2 and 7.7 in Segments 2 and 3 (Figure 4-1 at the end of this chapter). Although the alternate alignment would straighten the road in this segment, it would also result in greater impacts to relatively undisturbed forest habitats and could increase impacts on Hayfork Creek. The creation of a new road segment would also involve substantially higher construction costs and large amounts of fill.

Under this alternative, traffic-related impacts would be reduced during construction because the existing segment of Wildwood Road could remain open throughout most of the construction on the new alignment. This alignment, however, would result in greater disturbance of geologic and topographic features and forest habitat and greater potential for discharge of pollutants and sediment into Hayfork Creek during construction because the new road would be built on relatively undisturbed ground closer to the creek. The increase in traffic on the new alignment would create permanent changes in the noise environment, potentially changing the nesting and foraging locations for special-status birds and mammals. For these reasons—increased environmental impacts and increased construction costs—this alternative was eliminated early in the design process.

### **4.2.2 Alternative 4: Bridge Gulches Instead of Filling**

Alternative 4 would include bridges across the large ravines in Segments 2 and 3, rather than the currently proposed fills. The bridges would reduce the visual and biological impacts of the ravine fills. This option was eliminated due to the need for a location to place the large volume of material generated by excavations in other areas to accommodate the road widening and realignment. In order to provide two lanes along the entire segment of Wildwood Road in the project area, large cuts into the hillsides along the road would be necessary. Without the re-use of the material cut from the hillsides, the material would need to be removed from the project area and another location would need to be found to place the material. At this time, no known locations would accept this large volume of material. In addition, the environmental impacts associated with establishing a location to dispose the fill and the impacts of the truck traffic traveling outside the project area would be greater than for the proposed project.

### **4.2.3 Alternative 5: Spot Improvements**

Alternative 5 would include spot improvements along the road where they are most needed. Repair of specific elements of the road under this alternative may include installing guardrails in narrow sections, replacing drainage structures, or providing improvements to specific design elements. The

rationale for this alternative centers on fixing only those areas most in need of repair while avoiding construction on the remainder of the roadway, which would reduce environmental impacts, particularly traffic-related impacts during construction. The spot improvement alternative would be viable for a forest road with a very low level of use (less than 100 vehicles per day); however, the existing use is already higher than would be expected on a forest development road.

The spot improvements would provide some benefits to travelers along the road and result in fewer environmental impacts compared to the proposed project, but this alternative would not achieve the main project objectives of providing a roadway that meets current design standards and enhancing traffic safety by providing two safe traffic lanes. The spot improvements could actually make the road less safe. For example, adding guardrails without widening the road would effectively narrow the road because drivers naturally “shy away” from the guardrail, and the narrower surface would create more conflicts with oncoming traffic, reducing safety. Widening the road to two lanes in some locations and not in others would also decrease safety because drivers would come to expect a two-lane road throughout the corridor and not anticipate a sudden change to less than two lanes.

This alternative would address some of the project objectives, but would not address enough of them to substantially improve the road condition. Although some of the roadway deficiencies could be met by spot improvements, the road would still not meet the minimum highway standards for width and sight distance. It would also continue to have drainage problems due to flooding and a lack of adequate culverts and ditches and maintenance problems due to an inadequate sub-base. In addition, the safety of the roadway would either remain the same or become worse as a result of this alternative.

#### **4.2.4 Alternative 6: Approve One or Two Segments**

Alternative 6 would be an administrative alternative in that the Trinity County Board of Supervisors could elect to approve only a portion of the proposed project, such as one or two of the project segments. This alternative would reduce some of the project’s impacts, but accomplish only some of the project’s objectives. This alternative would not achieve the main project objectives of providing a roadway that meets current design standards and enhancing traffic safety by providing two safe traffic lanes.

Improving only one or two segments of the roadway would not consistently eliminate roadway deficiencies, resulting in an incongruous road in terms of widths and alignment. Although safety and driving hazards would be reduced or eliminated in some areas, hazards would remain in others. The remaining hazards, such as sharp curves or lack of shoulders, could be even more dangerous than they are currently because of increased driver expectations. Unimproved sections of the road would continue to have a variety of design deficiencies, including an inadequate structural section and road surface, substandard roadway width, poor roadside safety, and inadequate surface and subsurface drainage. These design deficiencies would contribute to ongoing safety and maintenance concerns.

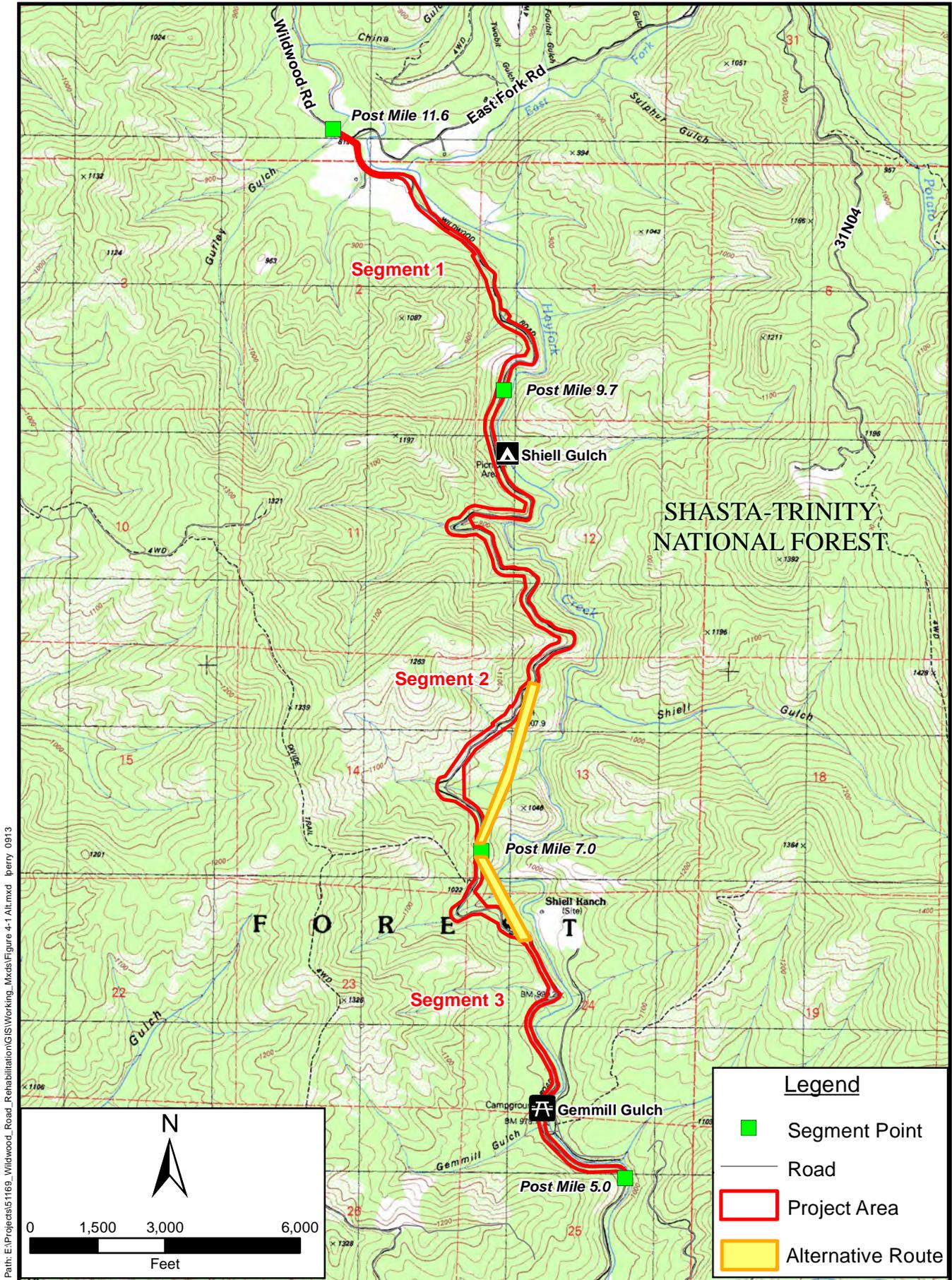
Environmental impacts associated with improving one or two segments instead of all three would be less; however, significant impacts would still occur because of the extensive amount of ground-disturbing activities needed in each of the segments to improve the roadway. Temporary construction-related impacts would be reduced overall because of the shorter construction period.

Long-term impacts, however, would only be alleviated along the improved segment(s) of the roadway, and hazards would remain in the unimproved segment(s).

### **4.3 Environmentally Superior Alternative**

In the short term, the no-project alternative would be considered the environmentally superior alternative because the ground disturbance, noise disturbance, road closures, and other temporary impacts expected to result during construction of the proposed project would be substantially less. However, in the long term, erosion and slope failures would continue to occur. The road would still contribute to water quality impacts in Hayfork Creek, and portions of the road surface would continue to be inundated in a 100-year flood. Safety problems and periodic interruptions of traffic would continue to occur. In addition, the no-project alternative fails to meet the long-term project objectives or objectives in the Trinity County General Plan, particularly the Circulation Element, with respect to resolving existing safety issues associated with the current alignment of Wildwood Road. The proposed project is, therefore, environmentally superior to the no-project alternative in the long term.

With the implementation of the mitigation measures identified in Chapter 3, impacts associated with the proposed project would be avoided or reduced to less-than-significant levels. In the long term, the proposed project would reduce environmental impacts that the no-project alternative would leave unaddressed. Results of this alternatives analysis indicate that the proposed project would provide the most effective means to achieve the project goals, minimize environmental impacts, and realize the benefits of the Wildwood Road Realignment and Widening Project.



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Wildwood Road Project

Figure 4-1  
Alternative Route

# Chapter 5. Other Required CEQA Sections

## 5.1 Cumulative Impacts

Cumulative impacts are the impacts on the environment that result from the incremental impacts of a proposed action when added to the impacts of other past, present, and reasonably foreseeable future actions (14 CCR 15355(b)), regardless of what agency (federal or non-federal) or entity undertakes such other actions. These impacts can result from individually minor but collectively significant actions taking place over time. The California Environmental Quality Act (CEQA) Guidelines require that the cumulative impacts of a proposed project be addressed in an environmental document when they are expected to be significant (14 CCR 15130(a)). When a lead agency is examining a project with an incremental effect that is not “cumulatively considerable,” the lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

The area considered in the cumulative impacts analysis varies for each resource topic. For transportation and traffic, the analysis area extends beyond Wildwood Road and encompasses State Route (SR) 36 from its intersection with Wildwood Road to SR 3 and SR 3 from its intersection with SR 36 to its intersection with Wildwood Road; these routes will serve as a detour or alternative transportation route for travelers during the construction phases. For air quality, the analysis area encompasses the North Coast Air Basin. For hydrology and water quality, the analysis area encompasses the Upper Hayfork Creek watershed. Other resource topics are evaluated at a more localized level, and the analysis area is limited to the Wildwood Road corridor and adjacent lands. The timeframe for the analysis extends from 2017 through 2025, which is the extent information on anticipated future projects is available.

The cumulative impact analysis uses a project approach and considers other projects that are planned or proposed for implementation at the same time as the proposed project. The main projects considered in the analysis were identified from the 2010 Regional Transportation Plan (Fehr and Peers 2011). The plan identifies a number of short-term projects, and most projects are scheduled for implementation prior to the anticipated construction schedule for the proposed project. Longer term, general project types are also identified in the plan, but specific details are not available for these. Projects expected to be implemented about the same time as the proposed project include:

- reconstruction or rehabilitation of existing roads in the county, such as Coffee Creek Road, Guy Covington Road, Lewiston Road, Barker Creek Road, B-Bar-K Road, Blanchard Flat Road, and Goose Ranch Road;
- bridge replacements, such as Guy Covington, Lorenz Street and Salt Creek Bridges;
- installation of guardrails and retaining walls on various county roads;
- culvert replacements on SR 3, SR 299, and Easter Avenue for fish passage;
- minor construction projects for sidewalks, Class II bike lanes, and other pedestrian and traffic calming facilities; and

- airport improvements to extend runways and taxiways and to construct hangars and heliports

Other projects, such as minor development or building projects in nearby communities, forestry projects by the Shasta-Trinity National Forest and highway improvement projects by California Department of Transportation (Caltrans), may also be implemented at the same time as the proposed project. Past population growth trends in the county, however, have been minimal, and little new development is expected. Specific details on future projects that have not yet been planned or approved are not available, and these projects are only generally considered in the context of the cumulative impact analysis.

### **5.1.1 Land Use**

The Wildwood Road project would require new right-of-way through private properties and National Forest System lands managed by the Shasta-Trinity National Forest, but land uses on adjacent properties would not be affected. The realigned road would improve access through the area and reduce safety concerns for travelers along the road. Land use conflicts would be limited to the construction phase and would primarily result from temporary road or lane closures and use of the recreation areas for staging. The proposed project would be consistent with the Trinity County General Plan and Shasta-Trinity National Forest Land and Resources Management Plan.

Impacts associated with the proposed project would be minimal and limited to the immediate vicinity of the project area; therefore, these impacts would not contribute to cumulative impacts. No reasonably foreseeable future projects are proposed along or adjacent to Wildwood Road, and no cumulative land use impacts would be expected.

### **5.1.2 Agricultural and Forestry Resources**

The Wildwood Road project would realign a portion of Wildwood Road across agricultural (grazing) lands and forests. The acquired right-of-way would remove a small portion of these lands from grazing (less than 13 acres) and forestry (less than 105 acres) uses. No important farmland would be affected, and less than 24 acres of suitable timberland would be affected. Grazing and forestry lands would remain on adjacent lands, with a minimal loss of these uses where the new road alignment is established. In addition, some of the current roadway would be restored after the realignment to be consistent with the adjacent uses.

Impacts associated with the proposed project would be minimal and limited to the immediate vicinity of the project area and would not contribute to cumulative impacts. No reasonably foreseeable future projects are proposed along or adjacent to Wildwood Road, and no cumulative agricultural or forestry impacts would be expected.

### **5.1.3 Transportation and Traffic**

The Wildwood Road project would temporarily affect traffic along the road during construction, but would improve traffic conditions over the long term by reducing safety concerns for travelers. Temporary road and lane closures would be required during the construction phase, but detours would be available along SR 3 and SR 36 for travel between Wildwood and Hayfork. With traffic control

measures in place during construction, traffic impacts would be minimal and would primarily affect landowners and managers of adjacent lands and recreationists using the nearby recreation areas. Traffic along the road and use of the road over the long term would be similar to current conditions.

Impacts associated with the proposed project could increase traffic along nearby SR 3 and SR 36 while they are used as alternative routes. No other projects have been specifically identified along SR 3 or SR 36 during the proposed construction phase for Wildwood Road. If other projects were to affect access or use of SR 3 or SR 36 during construction of the proposed project, cumulative impacts could result. Caltrans would be expected to require traffic control measures and minimize road closures during any construction along SR 3 or SR 36. The County and Caltrans can coordinate their projects to avoid conflicts, to some extent, barring emergency work or funding deadlines. Furthermore, any traffic delays during the construction phase would be temporary, similar to impacts associated with the proposed project. Cumulative traffic impacts would not be significant.

#### **5.1.4 Air Quality**

The Wildwood Road project would result in temporary construction emissions over a period of about 6 years, but long-term emissions from traffic using the road would be similar to current conditions. Most emissions, such as fugitive dust, would be expected to dissipate in the immediate vicinity of the work area, but some emissions could affect regional air quality in the North Coast Air Basin. Standard construction measures for dust and emissions control in combination with Mitigation Measure AQ-1 would reduce project-related air quality impacts to less-than-significant levels and reduce the potential for regional air quality impacts during construction.

Other projects implemented in the North Coast Air Basin at the same time as the proposed project could contribute to regional air quality impacts and result in cumulative impacts. Projects requiring County, Caltrans, or other agency approvals would need to comply with North Coast Unified Air Quality Management District air quality rules and/or Caltrans Standard Specifications, and additional mitigation measures may be identified during their environmental review processes to minimize air quality impacts. With implementation of measures similar to those identified for the proposed project, cumulative air quality impacts would not be significant.

#### **5.1.5 Noise**

The Wildwood Road project would result in temporary construction noise over a period of about 6 years, but long-term traffic-related noise would be similar to current conditions along the road. Construction noise would affect few people in the vicinity of Wildwood Road, and noise impacts would be localized around the work area.

Noise impacts associated with the proposed project would be minimal; the impacts would be limited to the immediate vicinity of the project area and would not contribute to cumulative impacts. No reasonably foreseeable future projects are proposed along or adjacent to Wildwood Road, so no cumulative noise impacts would be expected.

### **5.1.6 Biological Resources**

The Wildwood Road project would result in temporary construction-related disturbance and impacts to special-status species and a minimal loss of upland and riparian habitats in the project area. These impacts would be localized in the project area, but could result in regional impacts if special-status species are substantially affected. Mitigation Measures BR-1a through BR-6 would be implemented to avoid and minimize impacts on sensitive biological resources and reduce impacts to less-than-significant levels.

Biological resources impacts associated with the proposed project would be minimal with implementation of the mitigation measures and would not contribute to significant cumulative impacts. No reasonably foreseeable future projects are proposed along or adjacent to Wildwood Road, and no cumulative biological resources impacts on habitat or species in the immediate vicinity of the road would be expected. Other projects in Trinity County could also affect similar special-status species and their habitats, but they would be expected to implement measures similar to those identified for the proposed project to avoid or minimize impacts on sensitive biological resources, which would reduce the potential for significant cumulative or regional impacts.

### **5.1.7 Cultural Resources**

The Wildwood Road project is not expected to affect important cultural resources, but buried cultural resources or human remains could be encountered during ground-disturbing activities. Any such impacts would be localized in the project area, although the loss of a significant cultural resource could have regional consequences. Mitigation Measures CR-1a through CR-1c would be implemented to avoid and minimize impacts on important cultural resources and reduce impacts to less-than-significant levels.

Cultural resources impacts associated with the proposed project would be minimal with implementation of the mitigation measures and would not contribute to cumulative impacts. No reasonably foreseeable future projects are proposed along or adjacent to Wildwood Road, and no cumulative cultural resources impacts would be expected. Other projects in Trinity County would be expected to implement measures similar to those identified for the proposed project to avoid or minimize impacts on important cultural resources, which would reduce the potential for a loss of regionally important cultural resources.

### **5.1.8 Aesthetics**

The Wildwood Road project would degrade the visual character of the project area during the construction phase, but the long-term views along Wildwood Road would be similar to the current views. The road modifications would involve vegetation removal, grading, and blasting in rock outcrops, which would alter views along the road for travelers, but most travelers would not notice the changes. Overall visual changes along Wildwood Road would be minimal.

Aesthetics impacts associated with the proposed project would be minimal; they would be limited to the immediate vicinity of the project area and would not contribute to cumulative impacts. No

reasonably foreseeable future projects are proposed along or adjacent to Wildwood Road, and no cumulative aesthetics impacts would be expected.

### **5.1.9 Hydrology and Water Quality**

The Wildwood Road project would expose soils in the project area to erosion and could discharge sediment and pollutants into nearby Hayfork Creek during construction. Water quality impacts on Hayfork Creek would be temporary and would be minimized with implementation of Mitigation Measures HW-1a and HW-1b. New culverts would improve flow under the road, and long-term drainage impacts would be minimized with implementation of Mitigation Measure HW-3. Standard construction measures for water quality in combination with the mitigation measures would reduce project-related water quality impacts to less-than-significant levels and reduce the potential for regional water quality impacts in the Upper Hayfork Creek watershed during construction.

Other projects implemented in the Upper Hayfork Creek watershed at the same time as the proposed project could contribute to regional water quality impacts and result in cumulative impacts. Projects requiring County, Caltrans, or other agency approvals would need to comply with state and federal agency requirements and/or Caltrans Standard Specifications, and additional mitigation measures may be identified during their environmental review process to minimize hydrology and water quality impacts. With implementation of measures similar to those identified for the proposed project, cumulative hydrology and water quality impacts would not be significant.

### **5.1.10 Geology and Soils**

The Wildwood Road project would involve extensive cuts and fills and could cause erosion, landslides, and other hazards during construction. In addition, unstable slopes along the road could cause longer term impacts from landslides, resulting in road damage or closures. Standard construction measures and water quality mitigation measures would reduce erosion-related impacts during construction, and Mitigation Measure GS-3 would help protect steep slopes, thereby minimizing the longer term landslide potential. These measures would reduce impacts to less-than-significant levels. Areas disturbed during construction would also be restored with native vegetation or become part of the paved roadway or adjacent shoulders, which would stabilize the surface and reduce long-term erosion.

Geology and soils impacts associated with the proposed project would be minimal; they would be limited to the immediate vicinity of the project area and would not contribute to cumulative impacts. No reasonably foreseeable future projects are proposed along or adjacent to Wildwood Road, and no cumulative geology and soil impacts would be expected.

### **5.1.11 Hazards and Hazardous Materials**

The Wildwood Road project would involve the use of hazardous materials that could result in an accidental spill and equipment that could start fires during construction. Long-term hazards would be reduced with the improved road conditions, which would improve emergency response and access to lands along Wildwood Road. Standard construction measures, water quality mitigation measures, and

Mitigation Measures HM-1 and HM-2 would reduce construction-related impacts involving hazards and hazardous materials to less-than-significant levels.

Hazards and hazardous materials impacts associated with the proposed project would be minimal; they would be limited to the immediate vicinity of the project area and would not contribute to cumulative impacts. No reasonably foreseeable future projects are proposed along or adjacent to Wildwood Road, and no cumulative hazards and hazardous materials impacts would be expected.

## 5.2 Growth-Inducing Effects

The CEQA Guidelines (Section 15126.2(d)) requires consideration of the growth-inducing effects of the proposed project and a discussion of “the ways in which the proposed project could foster economic or population growth, or the construction of additional housing.” A project may be considered to be growth-inducing if it would:

- accelerate the rate of planned growth,
- remove obstacles to population growth,
- tax existing community service facilities, or
- encourage or facilitate other activities that could cause significant environmental impacts.

Growth itself is not assumed to be beneficial, detrimental, or insignificant to the environment, except when a physical environmental impact would result from a project. The physical growth-inducing impacts of the proposed project are discussed in Section 3.2, Land Use; no potential growth-inducing impacts were identified. The proposed project would entail modifications to an existing road (Wildwood Road) to ensure safe driving conditions along the road. Most of the road travels through National Forest System lands managed by the Shasta-Trinity National Forest, with no opportunities for development. A few private parcels exist along the road, but these are rural, agriculture-based properties that also have little potential for development. The proposed project is not intended to facilitate increased traffic capacity or encourage increased use of the road, and the existing function of the road (e.g., access for adjacent properties, thoroughfare for travelers between the communities of Wildwood and Hayfork) would be maintained. The proposed project would not be considered a growth-inducing project.

## 5.3 Significant and Unavoidable Impacts

Public Resources Code Section 21100(b)(2)(A) requires that an EIR include a detailed statement that summarizes any significant effects on the environment that cannot be avoided if a proposed project is implemented. CEQA Guidelines Section 15126.2(b) states that such impacts include those that can be mitigated but not reduced to a level of insignificance. When significant impacts are identified that cannot be fully mitigated to a less-than-significant level or be minimized by modifying the project design, the implications of the impacts and the reasons why the project is being proposed must be described. CEQA Guidelines Section 15093(a) allows the decision-making body of the lead agency to determine if the benefits of a proposed project outweigh the unavoidable adverse environmental impacts of implementing the project. Trinity County could approve a project with unavoidable adverse impacts if it prepares a “Statement of Overriding Considerations” setting forth the specific reasons for making such a judgment. Based on the analyses contained in Chapter 3 of this EIR, no

unavoidable adverse impacts were identified, and a “Statement of Overriding Considerations” is not necessary for approval of the project.

## 5.4 Significant Irreversible Environmental Changes

CEQA requires a discussion of significant irreversible environmental changes (Section 15126 of the CEQA Guidelines). Significant irreversible environmental changes are defined as uses of nonrenewable resources that may be irreversible due to a long-term commitment of these resources that makes future removal or nonuse unlikely. The proposed project would require the use of fossil fuels and other nonrenewable materials during construction, which would be an irreversible and irretrievable commitment of these resources. Modification of the existing road in approximately the same location would not preclude future development of energy sources or future energy conservation efforts. It likewise would not result in the loss of availability of mineral resources or groundwater resources.

## 5.5 Mitigation Monitoring Program for CEQA-Mandated Mitigation

CEQA (Section 21081.6(a)) requires lead agencies to “adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.” Chapter 3 of this EIR identifies proposed mitigation measures that would reduce significant impacts to acceptable levels based on the significance thresholds presented in each resource section. These measures have been incorporated into the draft mitigation monitoring and reporting program (MMRP), which is included as Appendix E.

The approval of the MMRP will be part of the discretionary action taken by Trinity County for the proposed project. The MMRP will be used by the County in conjunction with project contractors, cooperating and participating agencies, and monitoring personnel during project implementation. The intent of the MMRP is to ensure the effective implementation and enforcement of adopted mitigation measures and permit conditions. The MMRP will provide for monitoring of construction activities as necessary, on-site identification of environmental problems, and proper reporting to County staff. An overview of the MMRP contents is presented below.

### Responsibilities and Authority

Trinity County will have the primary responsibility for implementation of the MMRP, including:

- ensuring that the MMRP is incorporated into the construction bid documents,
- coordinating monitoring activities,
- directing the preparation and filing of compliance reports, and
- maintaining records concerning the status of all mitigation measures.

### Monitoring Plan Format

The MMRP in Appendix E describes the parties responsible for implementation of the plan; lists construction measures that have been incorporated into the proposed project (as described in Chapter 2 of this EIR); and identifies each mitigation measure that will be adopted, including the timing for

implementation of the measure (i.e., prior to, during, or after construction), coordination or consultation responsibilities, and the agency or person responsible for verification that the measure was completed. The mitigation measures were extracted from Chapter 3, Environmental Setting and Impact Analysis.

### **Noncompliance Complaints**

Complaints of noncompliance with adopted mitigation measures shall be directed to Trinity County in written form, providing specific information on the alleged violation. If any complaints are received, the County shall conduct an investigation and determine the validity of the complaint. If noncompliance with a mitigation measure has occurred, the County shall take the appropriate action to remedy the violation. The complainant shall receive written confirmation indicating the results of the investigation or the final action corresponding to the particular noncompliance issue.

# Chapter 6. References

## 6.1 Chapter 1 Introduction

None

## 6.2 Chapter 2 Project Description

California Department of Transportation. 2003. Storm water quality handbooks: construction site best management practices (BMPs) manual. State of California, Department of Transportation. March.

Five Counties. 2002. A water quality and stream habitat protection manual for county road maintenance in northwestern California watersheds. Prepared for the Five Counties Salmon Conservation Program. Administrative Draft. September.

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## 6.3 Chapter 3 Environmental Setting and Impact Analysis

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## **6.4 Chapter 4 Alternatives Analysis**

None

## **6.5 Chapter 5 Other Required CEQA Sections**

Fehr and Peers. 2011. Trinity County regional transportation plan. October.

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