



# ENVIRONMENTAL ASSESSMENT

Prepared for the  
**Seneca Healthcare District Facility Replacement Project  
General Plan Amendment, Zone Change, and LAFCO Annexation**

**Chester, Plumas County, California**

**July 2023**

**Prepared by Sequoia Ecological Consulting, Inc.**

## 1.0 Purpose and Need

### 1.1 Project Description

#### 1.1.1 Basic Project Information

**Project Name:** Seneca Healthcare District Hospital Replacement Project

**Responsible Entity (RE):** Seneca Healthcare District  
130 Brentwood Drive  
PO Box 737  
Chester, CA 96020

**State/Local Identifier:** (Blank in posted examples)

**EA Preparer:** (Agency employee in posted examples)

**Certifying Officer:** (Blank in posted examples)

**Grant Recipient** (if different than Responsible Entity):

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**Project Location:** Unincorporated community of Chester, Plumas County, CA

**Address:** Adjacent to Reynolds Road and Wildwood Lane (future street address to be determined), Chester, CA 96020, unincorporated Plumas County; T28N/R7E/Sec. 6 & 7, MDM; Latitude: 40.306954, Longitude: -121.236558

**Assessor's Parcel Numbers (APN):** APN 100-230-028 and APN 100-230-029 (proposed hospital facilities), APN 100-230-026 and APN 100-470-003 (heliport flight path), and APN 100-230-025 (potential primary access road and potential secondary emergency access).

**General Plan Land Use Designations:** The property is currently designated Resort and Recreation, Rural Residential, Single-Family Residential, Multiple-Family Residential, and Commercial.

**Zoning Districts:** Single-Family Residential (7-R), Multiple-Family Residential (M-R), Periphery Commercial (C-2), Recreational-Open Space (Rec-OS), Recreation (R-10), and Prime Recreation (Rec-P). The Rec-P portion of APN 100-230-028 also has a Limited Combining Zone (Ltd).

### 1.1.2 Description of the Proposed Project

Seneca Healthcare District (SHD; District) proposes to provide for the continuing care of their Plumas County and Chester area community through the construction of a new acute-care hospital and skilled nursing facility building to replace their existing aged facilities (**Exhibits A1 and A2**). The existing facilities will be repurposed for non-acute care uses that have yet to be determined, with preliminary candidate uses including outpatient behavioral health or expanded physical therapy. The existing facilities compared with proposed facilities are summarized in **Table 1**.

The proposed facilities would entail two different building types, all under one roof: an acute-care replacement hospital (OSHPD-1), and an expanded skilled nursing facility (OSHPD-2). There is also a proposed non-California Department of Health Care Access and Information (HCAI) support services building, detached, which would support the entire facility, and employee housing.

**Table 1 Existing and Proposed Facilities**

<b>Existing</b>	<b>Proposed</b>
<ul style="list-style-type: none"> <li>▪ 10-bed acute care, no negative pressure</li> </ul>	<ul style="list-style-type: none"> <li>▪ 10-bed acute care, 2 of those with isolation capabilities</li> </ul>
<ul style="list-style-type: none"> <li>▪ 2-bed open-bay emergency room</li> </ul>	<ul style="list-style-type: none"> <li>▪ 3-bed private emergency room and Trauma/procedure room within ED</li> </ul>
<ul style="list-style-type: none"> <li>▪ 16-bed skilled nursing facility</li> </ul>	<ul style="list-style-type: none"> <li>▪ 26-bed skilled nursing facility</li> </ul>
<ul style="list-style-type: none"> <li>▪ Imaging including x-ray, CT outside hospital in portable building, MRI via trailer</li> </ul>	<ul style="list-style-type: none"> <li>▪ Imaging to include x-ray, CT, ultrasound, and MRI via trailer</li> </ul>
<ul style="list-style-type: none"> <li>▪ Operating room &amp; 2-bed patient recovery</li> </ul>	<ul style="list-style-type: none"> <li>▪ Operating room, procedure room, &amp; 3-bed patient recovery</li> </ul>
<ul style="list-style-type: none"> <li>▪ N/A</li> </ul>	<ul style="list-style-type: none"> <li>▪ All spaces right-sized to allow for improved workflow, updated/improved infrastructure, updated medical equipment, and ADA accessibility per current code</li> </ul>

The proposed Project area totals 11.8 acres, including the existing 1.8-acre hospital site. In planning for the proposed Project, SHD acquired 10 acres of land on parcels adjacent to their existing campus (APN 100-110-030) and completed a lot line adjustment. The additional land was purchased from Collins Pine, an adjacent landowner within the timber operations industry. SHD plans to use the surrounding forested habitat to provide restorative and healing views of this scenery for the residents and patients, and to also maintain timber as appropriate in public areas to honor the neighboring industry. Secondary access is anticipated to be provided via the existing clinic’s rear parking lot, through to Brentwood Drive. Alternatively, a secondary access road may be established at the northwest corner of the proposed Project area through the Wildwood Senior Community. An optional helipad (Option 1) may be developed on the site that would have a flight path area outside the Project site encompassing approximately 6 acres.

To fund this construction effort, SHD is pursuing U.S. Department of Agriculture (USDA) funding as well as other funding sources, including a public bond measure (Measure B, passed in the November 8, 2022 election) and philanthropic offerings by the community. USDA funding will require compliance with the National Environmental Policy Act (NEPA), which is the subject of this Environmental Assessment (EA).

The new facility is intended to provide current state-of-the-art healthcare technology in a new, clean, modern building. The cumulative square footage of the facilities will total 45,000 square feet, plus up to 3,000 square feet of out/support services structures, and up to 10,000 square feet of employee housing. The basic functions of the three primary buildings are as follows:

#### **OSHDP-1 Building/Hospital**

- Nursing Services/Med-Surg – 8 semi-private and 2 private/isolation, total 10 beds
- Basic Emergency Services – 3 exam rooms, a trauma room that can be converted to 2 exam rooms, and 4 low-acuity waiting areas
- Pharmaceutical Services – a drug room for supply and distribution
- Laboratory Services
- Dietary Services – kitchen and dining
- Imaging Services – X-Ray, CT Scanner, Ultrasound, and mobile MRI
- Ambulatory Surgery
- Physical Therapy
- Retail Pharmaceutical (kiosks in entry Mall)

#### **OSHDP-2 Building/Skilled Nursing Facility**

- Skilled Nursing Beds – 24 semi-private and 2 private/isolation, total 26 beds
- Occupational Therapy

#### **Non-OSHDP Support Services Buildings**

- Maintenance, Materials Management, Laundry Services
- Employee Housing

In addition to the healthcare facilities described above, SHD plans to construct employee housing in the southwest corner of the site. The conceptual plan includes construction of up to ten (10) 1,000-square-foot residential units that will house up to ten employees of SHD and their families.

The facility will typically have a staff of about 48 employees on site at peak hours. An onsite surface parking lot containing 102 parking spaces is proposed to serve the needs of the facility, per Plumas County Code parking and loading requirements (Section 3.1.1). The proposed use of the property as a skilled nursing facility would be complementary to the existing hospital to provide a full spectrum of quality health care services for Plumas County residents.

The proposed Project would require a General Plan Amendment to replace the existing Plumas County 2035 General Plan (2035 General Plan) designations of *Resort and Recreation*, *Rural Residential*, *Single Family Residential*, and *Multiple Family Residential* with *Commercial* and *Multiple Family Residential*. The proposed Zone Changes would replace the existing *7-R*, *M-R*, *C-2*, *Rec-OS*, *R-10*, and *Rec-P* designations with *C-2* (health services and parking lots) and *M-R* (dwelling units). In the Plumas County Code, Title 9, Planning and Zoning, Chapter 2 Zoning, *health services and parking lots* are allowable uses within the *C-2* zone, and *dwelling units* is an allowable use the *M-R* zone.

The proposed Project will require the following discretionary decisions by SHD, Plumas County, Plumas Local Agency Formation Commission (LAFCO), and the California Department of Forestry and Fire Protection (CAL FIRE):

- A. Proposed Project:** SHD will need to approve the proposed healthcare facilities Project, including the acute-care hospital, skilled nursing facility, support buildings, employee housing, parking lots, access roads (including a main entrance and potential secondary emergency access across the adjacent Wildwood retirement home parcel), and related items.
- B. Option 1: Heliport and Flight Path Element:** As an optional element of the proposed Project, SHD will consider approving construction of a heliport to accommodate helicopter ambulance services, including the landing pad, flight path modifications (tree removal), and pathways connecting the pad to the medical buildings. (see **Exhibits A3 and B.**)
- C. General Plan Amendment and Zone Change:** Plumas County will need to approve a General Plan Amendment for land use designations and a Zone

Change for zoning districts to accommodate the proposed Project.

- D. LAFCO Annexation:** The proposed Project will require annexation by the Plumas County Local Agency Formation Commission (LAFCO) of parcels 100-230-028 and 100-230-029 into Chester Public Utilities District for provision of water and sewer services and for fire protection. Well and septic for the parcel would currently come from County Environmental Health Department permits, and wildland fire protection is provided by CAL FIRE.
- E. CAL FIRE:** Tree removal on-site is a timberland conversion permit, needing CAL FIRE Timber Harvest Plan (THP) approval prior to tree removal permit issuance. Approval for tree removal at the Collins Pine property for the Option 1 Helipad and Flightpath Element is anticipated to be a utility right-of-way exemption.

A small area of sensitive wetland habitat associated with a creek is located in the extreme northwest corner of the Project site (see Section 3.3). No development would occur in this area; the closest development—the optional helipad—would be located more than 200 feet away. Prior to Project construction, a qualified biologist would establish exclusion fencing with a buffer around the wetland/riparian area and encroachment into the buffer area by construction equipment or personnel would be prohibited. With this avoidance, the Project would not require approval from the U.S. Army Corps of Engineers.

At its discretion, SHD may approve the proposed Project (medical and housing facilities) with or without Option 1 (heliport and flight pathway). Option 1 is dependent upon SHD approval of the proposed Project, but the proposed Project has independent utility and is not dependent upon approval of Option 1.

## 1.2 Purpose and Need

USDA, Rural Development is a mission area that includes three federal agencies – Rural Business-Cooperative Service, Rural Housing Service, and Rural Utilities Service. The agencies have in excess of 50 programs that provide financial assistance and a variety of technical and educational assistance to eligible rural and tribal populations, eligible communities, individuals, cooperatives, and other entities with a goal of improving the quality of life, sustainability, infrastructure, economic opportunity, development, and security in rural America. Financial assistance can include direct loans, guaranteed loans, and grants in order to accomplish program objectives. Seneca Healthcare District is

seeking financial assistance from the USDA Rural Development (RD), Rural Housing Service (RHS) under its Community Facilities Program.

Seneca Healthcare District (SHD; District) proposes to provide for the continuing care of their Plumas County and Chester area community through the construction of a new acute-care hospital and skilled nursing facility building to replace their existing aged facilities. Primarily built in the 1950s and 1970s, SHD's current hospital buildings present a challenge to continued high-quality care in the size, accessibility, and environment of the current facilities. Considering the financial implications associated with the potential SB-1953 mandated seismic compliance upgrades of the existing buildings, SHD has elected to build new facilities and expand upon the current services offered by SHD. The new facility is intended to provide current state-of-the-art healthcare technology in a new, clean, modern building.

The intent of the design is to provide the hospital and skilled-nursing facility as separate building types with differing functions, but connected with the required seismic and building separations, so that there is seamless flow between each building type, built-in efficiencies for circulation of staff and patients, and shared use of spaces.

SHD's goals are to create a facility that will provide improved healthcare services to the community for another 70 years or more, continue to support the well-being and security of the community, and be able to grow and progress as both healthcare and the community advance into the future.

The region surrounding Chester has recently been previously impacted by forest fires, primarily the 2021 Dixie Fire. It is the desire of SHD to create a new facility that responds to the evolving requirements of wildland fire safety, allowing staff to continue to provide care to patients during emergencies. Further, final design of the Project will integrate access, disaster staging, infrastructure resiliency, and fire-resistant building materials.

## **2.0 Alternatives Evaluated Including the Proposed Action**

### **2.1 Proposed Action**

The proposed action would consist of construction of a new acute-care hospital and skilled nursing facility building to replace SHD's existing aged facilities in Chester, California. Details on the Project are described in Section 1.1.2, above.



## **2.2 Other Alternatives Evaluated**

The proposed Project is a less-complicated, single-site action and, in accordance with 7 CFR 1970.13(a), such projects are only required to consider and analyze the No Action alternative. Accordingly, the potential impacts of the No Action Alternative are disclosed in this EA but no other alternatives were evaluated.

## **2.3 No Action Alternative**

Under the No Action Alternative, the USDA would not fund the proposed new and expanded SHD facilities, and the new facilities would not be constructed. SHD and the community would have to make do with the existing aged and substandard facilities and the existing capacity limitations to provide primary healthcare.

Implementation of the No Action Alternative would have no adverse environmental effects because no construction activities would disturb biological resources, including wetlands, or buried cultural resources. There would be no potential for construction activity to cause erosion and sedimentation, generate noise, or result in accidental spills of hazardous materials. There would be no increase in traffic generated by an increased number of patients, visitors, doctors, nurses, and other employees that would result from an expanded healthcare facility. The benefit of ten new housing units on the County's housing stock would not be realized because the units would not be developed.

## **3.0 Affected Environment and Environmental Consequences**

### **3.1 Land Use**

#### **3.1.1 Affected Environment**

##### **3.1.1.1 General Land Use**

The Project site is located adjacent to a commercial corridor flanking State Highway 36, in the unincorporated Town of Chester, California. Commercial development flanking the highway gives way on both sides to residential development consisting predominantly of single-family homes on small lots. The compact town is bordered by forest land on the west and on the east by Lake Almanor, a large reservoir used for both recreation and hydroelectric generation. Immediately adjacent to the Project site are

single-family homes on the south, a Best Western hotel and several single-family homes on the east, a retirement community to the northeast, and by pine forest on the north and west. The 10 acres proposed for development are currently covered in pine forest. The existing 1.8 acres included in the Project site are currently developed with the existing SHD hospital.

The proposed General Plan Amendment would replace the existing 2035 General Plan designations of *Resort and Recreation, Rural Residential, Single Family Residential, and Multiple Family Residential* with *Commercial* and *Multiple Family Residential*. The proposed Zone Change would replace the existing *7-R, M-R, C-2, Rec-OS, R-10, and Rec-P* designations with *C-2* (health services and parking lots) and *M-R* (dwelling units). Additionally, the Limited Combining Zone (Ltd) on the existing Rec-P zoned portion of the property is proposed to be expanded and include the entire property. See **Exhibits C 1-2** for existing and proposed zoning. **Table 3.1-1** contrasts existing and proposed Zone District acreages resulting from the Proposed Zone Change.

**Table 3.1-1 Existing and Proposed Zone Districts**

<b>Existing Zone Districts</b>	<b>Acres</b>
Recreation-Open Space	2.2
Prime Recreation	4.3
Rural Zone	1.6
Single-Family Residential	1.9
Multiple-Family Residential	1.6
Periphery Commercial	0.2
<b>Total</b>	<b>11.8</b>

<b>Proposed Zone Districts</b>	<b>Acres</b>
Multiple-Family Residential	3
Periphery Commercial	8.8
<b>Total</b>	<b>11.8</b>

Allowable uses for Peripheral Commercial (C-2) under Plumas County Code Section 9-2.2002(a)(1) include: Building supply, business offices, child day care homes, limited child day care homes, child day care facilities, gas stations, *health services*, heavy equipment sales, heavy equipment services, lodging facilities, personal services, places of assembly, postal services, prefabricated building sales, recreation facilities, restaurants, retail stores, self-service facilities, taverns, vehicle sales, vehicle services, wholesale commercial supply, and *parking lots*. The proposed Project falls under the *health services* and *parking lots* categories as allowable uses.

Allowable uses for Multiple-Family Residential (M-R) under Plumas County Code Section 9-2.1402(a)(1) include: Dwelling units and manufactured homes, at the ratio of up to one dwelling unit or manufactured home for each 1/21.8 acre of lot area; and accessory dwelling units. The proposed ten (10) dwelling units would be sited on the proposed 1.4-acre M-R zoned area in the Southwest corner of the proposed Project site.

The primary uses of the parcel proposed to be designated C-2 will be the proposed hospital buildings (health services) and parking lots. The most extensive uses of the parcel proposed to be designated M-R are the proposed housing units (dwelling units) for hospital employees.

The Ltd is defined by Plumas County Code as follows:

**Purpose (Ltd.) – Sec. 9-2.2701**

*The purpose of the Limited Combining Zone (Ltd) is to mitigate uses which have the potential to have significant adverse social, economic, or environmental effects, and to implement the General Plan Diagram Directive for Limited Industrial areas. The potential adverse effects shall be identified based on General Plan requirements and shall be specified in the ordinance which zones the property.*

**Uses (Ltd.) – Sec. 9-2.2702**

- (a) The uses permitted by the zone with which the Ltd is applied shall be permitted subject to Site Development Review.*
- (b) All other uses shall be permitted subject to the requirements of the zone with which the Ltd is applied.*

When Project plans are submitted to the Plumas County Building Department, the Planning Department would conduct a Site Development Review to determine if the

Project has the potential to have significant adverse social, economic, or environmental effects. This process would involve separate environmental review pursuant to the California Environmental Quality Act (CEQA).

**Site Development Review – Sec. 9-2.1132**

*When the Planning and Development Agency rules on whether or not a proposed building for a use permitted subject to site development review complies with the provisions of this chapter, the Planning Director shall determine if the use may have a significant effect on the environment. Such determination shall be made in compliance with the Environmental Review Guidelines of the County.*

*If the Planning Director determines with certainty that there is no possibility that the use may have a significant effect on the environment, the Planning and Development Agency shall rule that the proposed building complies with the provisions of this article.*

**Site Development Permit – Sec. 9-2.1133**

*If the Planning Director determines that the proposed use may have a significant effect on the environment, the Planning and Development Agency shall rule that the proposed building does not comply with the provisions of this article unless a Site Development Permit is issued.*

*The Site Development Permit process entails submittal of a permit application by the project proponent. Upon completion of the application, the Planning Director investigates the application to ensure that the proposal consistent with the intent and purposes of the provisions of Ltd designation. The Zoning Administrator then schedules a public hearing on the permit application.*

*The Zoning Administrator considers the information provided by the application, the environmental document, the Planning Director's investigation, and facts provided by any person appearing at the hearing or by written communications relative to the application. The Zoning Administrator has forty (40) days after the close of the hearing to decide, unless an extension is granted for good cause or with the mutual consent of the applicant.*

*In granting a site development permit, the Zoning Administrator must come to the following findings:*

- *The use will not be detrimental to the health, safety, or welfare of persons residing in the vicinity of the use.*
- *The use is appropriate for the site, general surroundings, and environmental setting.*

*The Zoning Administrator, in granting a Site Development Permit, may impose conditions which ensure that the use will not be detrimental to the health, safety, and welfare of the persons residing in the vicinity of the use and which ensure that the use is appropriate for the site, general surroundings, and environmental setting. These conditions are imposed to remedy shortcomings in the environmental document identified by the Planning Department.*

The predominant land use designation in Plumas County is open space, with most of the land, approximately 94 percent of the total County area, dedicated to timberland or other managed resource uses. Consequently, many of these lands are managed for a combination of resource values, including, but not limited to timber production, recreation, mining, agriculture, and cultural and historic resources. The remaining 6 percent of the land area is used for purposes such as residential, commercial, industrial, and public service. Plumas County has mostly maintained a rural character with compact and walkable communities, including Chester.

The Land Use Element of the 2035 General Plan defines the goals, policies, and implementation measures that will facilitate appropriate growth and development. Between the years of 1981 and 2012, Plumas County experienced an approximate 13-percent increase in population. In more recent years, between 2000 and 2010, Plumas County experienced a 4-percent decline in population. The California Department of Finance predicts that Plumas County's population growth will be approximately 1 percent per decade between 2010 and 2050.

### **3.1.1.2 Important Farmland**

The Farmland Protection Policy Act (7 U.S.C. 4201 *et seq.*) is intended to minimize the impact federal programs and federally-funded development projects have on the unnecessary and irreversible conversion of important farmland to non-agricultural uses. Passed in 1981, it is administered by the USDA's Natural Resources Conservation Service (NRCS). It restricts conversion of prime farmland, unique farmland, and farmland of statewide or local importance. The determination of the importance of farmland on a given parcel or site is based on the soil quality of the property, along with other factors

that affect agricultural viability, such as proximity to water and sewer lines and the size of the parcel. The NRCS rates the quality of farmland using a Land Evaluation and Site Assessment (LESA) system.

The NRCS conducts an ongoing National Cooperative Soil Survey and has mapped the soils in over 95 percent of U.S. counties. The data is available via its Web Soil Survey (WSS), which it states is the largest natural resource information system in the world. The WSS indicates that the soils in the vicinity of the Project site consist of Forgay very gravelly and extremely gravelly sandy loam on 0- to 2-percent slopes (see **Exhibit C3**).

Within a search area extending approximately 1 mile north of the Project site and 1.5 miles west of the Project site, the WSS maps the following soil units (map unit symbols are in parentheses):

- Baileycreek-Weste complex, 15 to 30 percent slopes (112)
- Baileycreek-Weste complex, 30 to 50 percent slopes (113)
- Forgay very gravelly gravelly sandy loam, 0 to 2 percent slopes (207)
- Forgay extremely gravelly sandy loam, 0 to 2 percent slopes (208)
- Mountmed clay loam, 0 to 3 percent slopes (295)
- Redriver-Gerle complex, 2 to 9 percent slopes (337)
- Redriver- Weste complex, 2 to 9 percent slopes (338)

The NRCS does not classify any of these soil units as prime farmland. In addition, the Project site and surrounding environs are not designated as important farmland by the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP). The only portion of Plumas County in which the DOC has mapped important farmland is in Sierra Valley, which is located approximately 55 miles southeast of Chester (see **Exhibit C4**). In addition to the maps produced and updated every two years by the FMMP, the DOC also maintains an interactive Important Farmland Finder on its website, which depicts no important farmland in the environs around Lake Almanor, including all of the community of Chester. The nearest mapped farmland is Farmland of Local Importance, mapped in Tehama County, roughly 25 miles to the west of Chester (see **Exhibit C5**).

### **3.1.1.3 Formally Classified Lands**

The nearest formally classified land to the Project site is Lassen National Forest, which at the closest point is approximately 2.75 miles west of the site. There are no other

formally classified lands in the Project vicinity, such as national parks, historic landmarks, wildlife refuges, or state parks. The nearest designated Wild and Scenic River is the Middle Fork Feather River, which is located approximately 35 miles south of the Project site.

## **3.1.2 Environmental Consequences**

### **3.1.2.1 General Land Use**

The proposed Project would not be incompatible with existing land uses in the Project vicinity. It would expand and modernize the existing SHD health care facility, which provides a critically important function to the community of Chester. The site is located at an interface of commercial development to the east, residential development to the south, and undeveloped forest land to the west and north. Implementation of the project would not divide or disrupt the existing community and would not create any physical barriers to connectivity within the community.

The proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The Plumas County 2035 General Plan contains policies that are mitigating policies designed to minimize potential impacts, including the following:

#### ***General Land Use (LU) 1.1.1. – Future Development***

*The County shall require future residential, commercial and industrial development to be located adjacent to or within existing Planning Areas; areas identified on Plumas County's General Plan Land Use Maps as Towns, Communities, Rural Areas or Master Planned Communities, in order to maintain Plumas County's rural character with compact and walkable communities. Future development may also be approved within areas for which Community Plans or Specific Plans have been prepared. Small, isolated housing tracts in outlying areas shall be discouraged as they disrupt surrounding rural and productive agricultural lands, forests, and ranches and are difficult and costly to provide with services. Land division may be allowed outside of Planning Areas only when the resulting development complies with all applicable General Plan Policies and County Codes.*

**LU 1.1.2 – Infill Development**

*The County shall plan to concentrate new growth both within and contiguous to existing Towns and Communities and require expansion of existing infrastructure as needed to efficiently and safely serve the new growth.*

**LU 1.5.1 – Use of Existing Infrastructure**

*The County shall require the use of existing infrastructure for new development whenever feasible.*

**LU 1.5.2 – Cost Effective Land Use Pattern**

*The County shall develop a land use pattern that, to the maximum extent feasible, will facilitate the delivery of community services in the most cost-effective manner for water, sewer, flood control, public safety services, and road construction and maintenance.*

**LU 1.5.3 – Provision for Fire and Life Safety Services**

*The County shall require development to be located adjacent to, or within, areas where fire and life safety services exist, or can be efficiently and economically provided.*

**LU 1.5.4 – Maintain Existing Levels of Services**

*The County shall ensure new growth and developments do not create adverse impacts on existing County-owned and operated facilities.*

**LU 1.6.1 – Land for Commercial and Industrial Uses**

*The County shall provide adequate amounts of land in and adjacent to identified Towns and Communities and within Rural Places to be designated and zoned to allow for and support commercial and industrial development.*

**LU 1.8.1 – Land for Large-scale Commercial and Industrial Uses**

*The County shall require that sites for moderate-to large-scale industrial and commercial development be located within or near the Town and Community areas; within areas for which Specific Plans or Master Plans have been prepared; or within areas that contain, or are capable of containing, infrastructure adequate to support the use of the property for more intensive non-residential purposes, such*



*as abandoned mill sites. Additionally, the County shall consider the location of such land uses where appropriate to reduce travel and commute times.*

**Impacts of Option 1:** Same as proposed Project.

**Impacts of General Plan Amendment and Zone Change:** The purpose of the current Rec-OS zoning is to provide for open space and open space recreation uses to maintain the natural environment. The General Plan Amendment/Zone Change proposes removal of the area zoned Rec-OS, which under the Plumas County 1974 General Plan was zoned Green Belt District and intended to serve as a protected natural area. Under the Plumas County 1985 General Plan the area was zoned Rec-OS which included the constraint of being designated as an “Important Fish & Wildlife Habitat and Recreation Water Area.” Removal of the Rec-OS zoning and conversion to C-2 in the northwest approximate 2.7 acres of the property will result in the removal of natural area protections associated with Rec-OS zone and make allowable development for health services use under C-2 zoning. Adjacent lands zoned Rec-OS include approximately 11.5 acres, the balance of which would remain natural areas. The Project property subject to rezone, formerly a pine plantation, is not a particularly valuable example of a local natural area. The conversion of Rec-OS acreage to C-2 is considered less than significant.

In compliance with the Ltd combining zone overlay, and when Project plans are submitted to the Plumas County Building Department, the Planning Department will conduct a Site Development Review to ensure that the Project will not have significant and unmitigated social, economic, or environmental adverse effects.

Because the General Plan Amendment and Zone Change are the necessary precursors to enabling the proposed Project and Option 1 to proceed, the potential impacts on land use and planning of adopting the General Plan Amendment and Zone Change are equal to the additive impacts of the proposed Project and Option 1.

**Impacts of LAFCO Annexation:** LAFCO annexation will have no impact on land use and planning, but for it being another necessary precursor to the proposed Project and Option 1, and thus having the indirect effect of making the proposed Project and Option 1 possible.

**Determination:** The General Plan Amendment and Zone Change, LAFCO Annexation, proposed Project, and Option 1 will result in ***less-than-significant impacts*** related to land use or planning conflicts.

### 3.1.2.2 Important Farmland

The proposed Project would not convert prime farmland or other important farmland to a non-agricultural use; the Project would have **No Effect** on important farmland.

### 3.1.2.3 Formally Classified Lands

As there are no other formally classified lands in the Project vicinity, the Project would have **No Effect** on formally classified lands.

### 3.1.3 Mitigation

No mitigation for land use and planning impacts is required.

## 3.2 Floodplains

### 3.2.1 Affected Environment

Special Flood Hazard Areas in Plumas County, such as the 100-year flood hazard area, have been mapped by the Federal Emergency Management Agency (FEMA). FEMA has identified the flood hazard areas located in, or in the vicinity of, Chester, Greenville, Crescent Mills, Taylorsville, Quincy, Vinton, and the City of Portola, including the 100-year and 500-year flood hazard areas. The proposed Project facilities are located approximately 1,500 feet southwest of the nearest mapped 100-year flood hazard area associated with North Fork Feather River, as shown on **Exhibit C6**. The Project site is located in Zone X, which is assigned by FEMA to areas that have been determined to be outside the 500-year floodplain. A Standard Flood Hazard Determination Form (SFHDF) documenting this is presented as **Exhibit C7**.

### 3.2.2 Environmental Consequences

The proposed Project would not alter a floodplain and would have **No Effect** due to being located within a 100-year or 500-year floodplain as designated by FEMA.

### 3.2.3 Mitigation

No mitigation for floodplain-related impacts is required.

## 3.3 Wetlands

### 3.3.1 Affected Environment

A wetland screening investigation of the Project site (**Exhibit T1**) was conducted by a wetland specialist that determined there is a limited amount of wetland habitat on the site. There is a wetland area, identified as “Forest/Shrub Wetland” per the National Wetlands Inventory (NWI), that extends into the extreme northwestern corner of the Project area and is associated with a linear hydrologic feature mapped in the California Streams database labeled as “Stover Ditch.” The NWI-mapped wetlands are shown in relation to the Project site in **Exhibit D** and in relation to the Option 1 (helipad) site in **Exhibit E**. The wetted area itself extends into the Project area by approximately 7 feet, about 145 feet west of the northwestern corner of the site. The dominant plant in this area is woolly sedge (*Carex pellita*), which is a wetland indicator (FAC or wetter). Soils were black, with few faint mottles, and there was a pooled area with slow moving water—likely small tributaries from the riverine system identified on NWI. Evidence of wetland hydrology was observed only in the form of drainage patterns (a secondary indicator), but a high-water table is likely present during the spring growing season.

The wetland is on a low, streamside terrace, with the adjacent Jeffrey pine forest approximately 1 foot higher in elevation. The woody riparian vegetation (*Salix sp.*) extends into the Project area in three locations along the northern border—at the extreme northwest corner, the extreme northeast corner, and toward the middle of the northern boundary. Stover Ditch may be considered waters of the United States by the U.S. Army Corps of Engineers (USACE) and by the Central Valley Regional Water Quality Control Board (RWQCB), pursuant to the federal Clean Water Act (CWA).

Also located in the northwest corner is a transitional zone between Jeffrey pine forest (UPL) and riparian habitat associated with the wetland area, as indicated by the presence of willows and several black cottonwoods (FAC) that could be included as a regulated riparian feature if a Streambed Alteration Agreement with the California Department of Fish and Wildlife (CDFW) was deemed necessary for the associated wetland area. However, if work affected the transitional habitat only, it is unlikely that CDFW would require a Streambed Alteration Agreement for the work.

A dried swale is located on the extreme western edge of the Project area. Several willows were located off the Project area, and several black cottonwoods were located just within the Project boundary, but with no other evidence of wetland. The swale itself

looked to have been dry for several years and is unlikely to be affected by Project activities based on location.

A constructed ditch/basin is present along the southeastern boundary of the Project area, adjacent to the paved medical clinic driveway. The western end of the feature (at the northwestern corner of the parking area) is at the same elevation as the paved parking area and deepens to the east. No outlet was observed. This feature does not possess wetland characteristics, but it may hold precipitation or snowmelt at certain times of the year, and therefore may meet the RWQCB's definition of surface water. However, for similarly created waters of the State, the Water Board typically waives its permit authority.

Within the Project area, no additional potentially jurisdictional features were observed during a reconnaissance-level assessment conducted on June 3, 2022 by biologists with Sequoia Ecological Consulting, Inc.

Neither the on-site herbaceous wetland nor the roadside ditch appear to be subject to federal jurisdiction under the Navigable Waters Protection Rule. Neither feature has direct connectivity to federally regulated waters. The ditch is constructed wholly in uplands and, except during infrequent floods, receives only sheet-flow from adjoining uplands. The State of California claims jurisdiction over all surface waters, which would include both the wetland and the roadside ditch.

The extent of federal jurisdiction is typically determined by USACE staff in accordance with the Navigable Waters Protection Rule, or other rules that are in effect at the time of determination. The extent of state jurisdiction is typically determined by staff of the Water Board in accordance with the State Wetland Definition and Procedures for Discharges of Dredged or Fill Materials to Waters of the State. SHD does not anticipate having to obtain these determinations from either agency owing to its commitment to avoidance under Mitigation Measure WET-1.

Site plans have been designed to fully avoid the wetland. Potential indirect effects on the wetland would be avoided by the implementation of a mandatory Stormwater Pollution Prevention Plan (SWPPP), which would specify site-specific measures to reduce erosion and minimize the potential for spills of hazardous materials.

The Plumas County 2035 General Plan contains the following policies that are mitigating policies designed to minimize potential impacts to wetlands:

***Conservation and Open Space (COS) 7.2.1 – Habitat Protection***

*The County shall protect areas that have significant habitat and wetland values, including riparian corridors, wetlands, grasslands, and creeks and rivers, from incompatible rural development. The County shall also support their protection as a method to provide carbon sequestration for greenhouse gas (GHG) emissions under applicable state programs.*

***COS 7.2.6 – No Net-Loss of Wetland Habitats***

*The County shall require new development that is subject to review under the CEQA to achieve a “no-net-loss” of wetland habitat through avoidance or appropriate mitigation in consultation with the appropriate resource protection agencies.*

Helipad and Flight Path Option

A dried swale continues from the proposed Project area into the adjacent Collins Pine parcel, starting in the middle of the extreme northeast edge of the parcel and continuing throughout the entirety of the property to the southwest, where the swale splits off in two directions—one that continues southwest and one that travels approximately due west. There is also a swale near the northern end of the Project area that may be associated with the larger swale mentioned above—where the swale continues northwest and then splits again in two—one end of which continues northwest and the other that continues southwest before abruptly tapering off. No wetland-associated vegetation was noted throughout either swale area. Toward the southern end, the swale begins to look more like a seasonal waterway, with some very minor bank cutting in some areas, and medium-sized smoothed cobbles at the bottom of the potential waterway. However, piles of cobble are also present throughout the Collins Pines property, likely due to previous mining activities. The swale ultimately runs through a culvert, which is outside the Project area. No black soils are present—only sand and cobble. The swale itself looked to have been dry for several years and is unlikely to be affected by Project activities based on location.

Within the helipad flight path area, no additional potentially jurisdictional features were observed during the reconnaissance-level assessment by Sequoia biologists on September 30, 2022.

### 3.3.2 Environmental Consequences

Project construction activities could potentially encroach into waters of the U.S., resulting in their loss or degradation. Potential erosion and sedimentation impacts to wetlands or other waters of the U.S. during Project construction would be avoided through implementation of the required Stormwater Pollution Prevention Plan (SWPPP), discussed further in Section 3.4, Water Resources. However, encroachment into the sensitive wetland habitat, were it to occur, would be a **significant adverse effect** of the Project with or without Option 1. The impact can be avoided by precluding encroachment into the wetlands, as required by Mitigation Measure WET-1.

### 3.3.3 Mitigation

**Mitigation Measure WET-1: Implementation of ESAs and Monitoring for Waters of the United States and Associated Riparian Zones.** Prior to Project implementation, with or without Option 1, any waters of the United States, potential waters of the United States, and associated riparian zones shall be established as environmentally sensitive areas (ESAs) and marked off with fencing as directed by a qualified biologist. Monitoring by a qualified biologist shall occur for any required work near the ESAs. With implementation of these measures, adverse effects on wetlands and other waters of the U.S. would not be significant.

## 3.4 Water Resources

### 3.4.1 Affected Environment

#### 3.4.1.1 Surface Water

The project area is located within the Upper Feather River watershed, which encompasses 98 percent of Plumas County and also extends into neighboring Butte, Shasta, Lassen, and Sierra counties, though 72 percent of the watershed is within Plumas County (**Exhibit E1**). The tributaries of the Upper Feather River watershed drain over 2 million acres of land in the Sierra Nevada mountains into Lake Oroville in Butte County, located about 46 miles south of the Project site.

The Upper Feather River watershed is divided into four main branches, each fed by its respective watershed: the West Branch, the North Fork, the Middle Fork, and the South Fork. The Project site lies within the North Fork Feather River watershed, which flows generally southwards from its headwaters near Lassen Peak to Lake Oroville in the Sierra foothills, passing through Lake Almanor, located about 1.5 miles east of the Project site.

The North Fork drains 1,380,110 acres (about 2,100 square miles) of the western slope of the Sierras and is the largest tributary of the Feather River, both by watershed size and discharge. It produces approximately 2,336,680 acre-feet<sup>1</sup> of annual inflow to Lake Oroville.

A number of smaller creeks and streams feed the North Fork of the Feather River, including East Branch, Indian Creek, Spanish Creek, Bucks Creek, and Warner Creek.

Lake Almanor, a manmade reservoir created by damming the North Fork of the Feather River, has a surface area of approximately 10.9 square miles, making it the largest surface water body in Plumas County. It supplies 3.2 million acre-feet of water per year to the State Water Project (SWP) from the Upper Feather River watershed that is stored downstream in Lake Oroville and subsequently delivered to 29 water agencies.

Although water quality in Lake Almanor is generally good, it is listed on the Clean Water Act Section 303(d) list of impaired water bodies compiled by the U.S. Environmental Protection Agency (USEPA), due to elevated mercury levels and high pH. The RWQCB is in the process of developing Total Maximum Daily Loads (TMDLs) for these contaminants. A TMDL must account for all sources of the pollutants that caused the water to be listed. Federal regulations require that the TMDL, at a minimum, account for contributions from point sources (federally permitted discharges) and contributions from non-point sources (i.e., polluted runoff). TMDLs are established at the level necessary to implement the applicable water quality standards.

Water quality in the North Fork of the Feather River upstream of the lake is good, and it is not included on the 303(d) list. However, the river segment below Lake Almanor is listed for mercury, polychlorinated biphenyls (PCBs), temperature, and toxicity. A variety of State and county agencies are working to improve water quality in the Feather River watershed. Among the programs, the Plumas County Flood Control District (PCFCD) partners with the California Department of Water Resources (DWR) and the State Water Project in the Plumas Watershed Forum, which is intended to improve water quality, stream health, and groundwater storage/retention, among other objectives. As another example, the PCFCD is a sponsor of the Upper Feather River Integrated Regional Water Management Program.

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<sup>1</sup> A acre-foot foot is the amount of water necessary to cover 1 acre of land to a depth of 1 foot, and is equivalent to 325,851.43 gallons, or 43,560 cubic feet.

The proposed Project will be required to obtain coverage under the Statewide Construction General Permit (CGP) Order 2009-0009-DWQ, administered by the RWQCB. (This permit has been administratively extended until a new order is adopted and becomes effective.) The CGP is issued by the State Water Resources Control Board (SWRCB), which has been designated by USEPA to regulate stormwater discharges in compliance with the National Pollutant Discharge Elimination System (NPDES). Separate NPDES permits regulate construction-related discharges and operational discharges, respectively. The CGP authorizes the discharge of stormwater to surface waters from construction activities, but prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance in excess of reportable quantities established at 40 CFR 117.3 or 40 CFR 302.4, unless a separate NPDES Permit has been issued to regulate those discharges.

Generally, new development that entails “land disturbance” of 1 acre or more requires the project sponsor to obtain coverage under CGP. In order to obtain coverage, the Project sponsor will be required to minimize or prevent pollutants in stormwater discharges through the use of controls, structures, and management practices that achieve best available technology (BAT) for toxic and non-conventional pollutants and best conventional technology (BCT) for conventional pollutants. Measures to control non-stormwater discharges such as spills, leakage, and dumping must be addressed through structural as well as non-structural Best Management Practices (BMPs). For dischargers utilizing active treatment systems (ATs), stormwater discharge must meet specified Numeric Effluent Limitations (NELs). All dischargers are also required to implement post-construction BMPs at the project site to reduce reasonably foreseeable runoff and pollutants in stormwater discharges unless they are subject to the post-construction requirements of an existing Phase I or II Municipal Regional Stormwater Permit.

Construction stormwater BMPs are intended to minimize the migration of sediments off-site. They can include covering soil stockpiles, sweeping soil from streets or other paved areas, performing site-disturbing activities in dry periods, and planting vegetation or landscaping quickly after disturbance to stabilize soils. Other typical stormwater BMPs include erosion-reduction controls such as hay bales, water bars, covers, sediment fences, sensitive area access restrictions (for example, flagging), vehicle mats in wet areas, and retention/settlement ponds.

To obtain coverage, the applicant must electronically file a number of permit-related compliance documents referred to as Permit Registration Documents (PRDs). The required



PRDs include a Notice of Intent (NOI), a risk assessment, site map, signed certification, Stormwater Pollution Prevention Plan (SWPPP), Notice of Termination (NOT), NAL exceedance reports, and other site-specific PRDs that may be required. The PRDs must be prepared by a Qualified SWPPP Practitioner (QSP) or Qualified SWPPP Developer (QSD) and filed by a Legally Responsible Person (LRP) on the RWQCB's Stormwater Multi-Application Report Tracking System (SMARTS). Once filed, these documents become immediately available to the public for review and comment.

A SWPPP is a site-specific document developed to identify potential sources of stormwater pollution at a construction site and the BMPs that will be employed to reduce and contain them. The CGP identifies the following objectives and requirements for SWPPPs:

1. All pollutants and their sources, including sources of sediment associated with construction, construction site erosion and all other activities associated with construction activity are controlled;
2. Where not otherwise required to be under a Regional Water Board permit, all non-storm water discharges are identified and either eliminated, controlled, or treated;
3. Site BMPs are effective and result in the reduction or elimination of pollutants in storm water discharges and authorized non-storm water discharges from construction activity to the BAT/BCT standard;
4. Calculations and design details as well as BMP controls for site run-on are complete and correct, and
5. Stabilization BMPs installed to reduce or eliminate pollutants after construction are completed.

Because the community of Chester has a population under 10,000 residents and has a population density below 1,000 residents per square mile, Chester is below the thresholds the RWQCB applies for coverage under a Municipal Regional Stormwater Permit. Therefore, the Project's operational stormwater discharges would not be subject to regulation by the RWQCB pursuant to the NPDES. However, as required by the CGP, operational stormwater discharges not subject to regulation must still be eliminated, controlled, or treated by project sponsors.

A stormwater drainage study (**Exhibit T2**) prepared by Northstar evaluated the hydrology of the site and analyzed the adequacy of the proposed on-site detention basin. The project has been designed to capture stormwater runoff from the site's impervious surfaces, including building rooftops, and detain it in detention basin capable of retaining the 25-year, 24-hour storm event. However, the design is conservative and the project engineer

estimates that it has additional capacity sufficient to accommodate runoff from larger storms, up to the 100-year storm.

Currently, no storm runoff is detained, and during the 25-year design storm, discharge from the site is estimated to be 0.47 cubic feet per second (cfs). While development of the Project's impervious surfaces would result in an increase in this discharge to 0.86 cfs, 100 percent of the runoff would be retained on site in the detention basin and would ultimately infiltrate the underlying ground, resulting in a net reduction of runoff of 0.47 cfs during the 25-year storm. Under the 100-year storm conditions there would be a similar reduction in comparison with existing conditions. The pre-development discharge of 0.62 cfs would be increased by the Project to 1.14 cfs, but it would all be retained on site, resulting in a net reduction of 0.62 cfs during this storm event.

Captured runoff from the building and paved areas would be diverted to vegetated swales that would discharge into the detention basin, which would filter and percolate the water to underlying groundwater, while providing natural biotreatment of the stormwater. The underlying gravelly, sandy loam soils are conducive to percolation.

### **3.4.1.2 Groundwater**

The community of Chester is located within the Lake Almanor Valley groundwater basin, which has a storage capacity of 45,000 acre-feet, which is relatively small (**Exhibit E2**). Plumas County's subsurface geology, much of it underlain by relatively impermeable volcanic rock, is not conducive to the formation of large groundwater aquifers. Groundwater quality in the Lake Almanor Valley basin is monitored by both the DWR and the California Department of Health Services (DHS) via 18 monitoring wells. The groundwater basin is healthy, both in terms of water quality and water storage. Annual groundwater extraction for municipal and industrial uses is estimated to be 740 acre-feet, while deep percolation of applied water is estimated to be 690 acre-feet.

The US EPA database of sole source aquifers indicates that no sole source aquifers are located in Plumas County.

## **3.4.2 Environmental Consequences**

### **3.4.2.1 Surface Water**

The proposed Project would not 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. The Project would include development of an onsite detention basin capable of retaining the 25-year (24-hour) design storm event, up to the 100-year storm event. Because the detention basin would serve to reduce stormwater discharge from the site in comparison with existing conditions and would provide natural biotreatment of the stormwater through percolation, the Project would have ***no adverse effect*** on surface water, with or without Option 1.

#### **3.4.2.2 Groundwater**

While implementation of the proposed Project would increase the amount of impervious surfaces on the site, thereby incrementally reducing the amount of groundwater recharge potential at the site, this would be offset by the proposed detention basin, which would retain peak storm runoff on the site, allowing it to infiltrate groundwater over a prolonged period. Therefore, it is expected that the Project would result in an increase in groundwater recharge in comparison with existing conditions, where storm runoff flows offsite unimpeded. Accordingly, the Project would have ***no adverse effect*** on groundwater, with or without Option 1.

#### **3.4.3 Mitigation**

As no adverse impacts to surface water or groundwater were identified, no mitigation would be required.

### **3.5 Coastal Resources**

#### **3.5.1 Affected Environment**

There are no coastal resources in the vicinity of the proposed Project, and there is no potential for the Project to adversely affect coastal resources.

#### **3.5.2 Environmental Consequences**

The proposed Project would have ***no effect*** on coastal resources.

#### **3.5.3 Mitigation**

No mitigation is required for impacts to coastal resources.

## 3.6 Biological Resources

### 3.6.1 Affected Environment

#### 3.6.1.1 Listed Threatened or Endangered Species

Information presented in this section is based on a Biological Resources Report (**Exhibit T3**) prepared by Sequoia Ecological Consulting.

##### Special-Status Plants

Although 39 special-status plants have been previously documented within 3 miles of the Project site (see **Exhibit F**), no special-status plants have been observed or mapped there. Biologists from Sequoia Ecological Consulting analyzed the potential for these plant species—as well as species included in California Native Plant Society (CNPS) and U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) resource lists—to occur on the Project site, based on a desktop review of the following sources:

- USFWS IPaC search (USFWS 2020), and Critical Habitat Portal (USFWS 2020; Appendix B and C; Figures 7)
- CNPS Online Inventory of Rare and Endangered Plants of California for the Chester, California and eight surrounding USGS 7.5-minute quadrangles (CNPS 2020; Figures 12 and 13)
- USFWS National Wetlands Inventory (NWI) (Figure 6)
- CDFW California Natural Diversity Database (CNDDDB) for the Project polygon and a 3-mile buffer (CDFW 2020; Figures 10 and 11)
- Aerial photographs (Google Earth 2020)

The documented occurrence of special-status plant species within a 3-mile radius of the Project site are depicted on **Exhibit G** and those documented within a 3-mile radius of the Option 1 helipad flight path are shown on **Exhibit H**. A number of these species require specialized habitats such as natural upper and lower montane coniferous forests, chaparral, scrub, meadows, seeps, vernal pools, bogs and fens, and marshes and swamps that are not found on the Project site. Due to anthropogenic disturbance, lack of suitable habitat and soil types, and/or lack of known/recent occurrences in the Project vicinity, none of the 39 special-status plant species are expected to occur on the Project site of the Option 1 helipad flight path. However, floristic surveys are recommended during appropriate blooming periods to prove absence.

### **Special-Status Wildlife**

Sequoia also conducted a desktop review of the CNDDDB and IPaC resource lists to identify special-status wildlife species within a 3-mile radius of the Project site, and identified 12 species. As part of this review, Sequoia also consulted CalFish, a database of anadromous fish and stream habitat produced by a cooperative program involving multiple agency and organization partners, and Pisces, a database of California's 133 native fish and numerous non-native fish, also compiled by multiple partners.

The 12 special-status wildlife species identified in the desktop survey are listed in **Exhibit I** for both the Project site and the Option 1 site, and they are graphically illustrated on **Exhibit J** (Project) and **Exhibit K** (Option 1). Sequoia analyzed the potential for these wildlife species to occur on the Project site. A number of these species require specialized habitat such as lakes, pools, ponds, meadows, grassland, and older growth forests that are not found on the Project site. Due to lack of suitable habitat and/or lack of recent occurrences in the Project vicinity, ten special-status wildlife species are not expected to occur and are therefore not discussed further in this analysis. These ten species are: Sierra Nevada red fox (*Vulpes vulpes necator*), northern goshawk (*Accipiter gentilis*), greater sandhill crane (*Grus canadensis*), southern long-toed salamander (*Ambystoma macrodactylum*), Sierra Nevada yellow-legged frog (*Rana sierrae*), California red-legged frog (*Rana draytonii*), Cascades frog (*Rana cascadae*), delta smelt (*Hypomesus transpacificus*), western bumblebee (*Bombus occidentalis*), and obscure bumblebee (*Bombus caliginosus*). Descriptions and potential for occurrence of the remaining two special-status wildlife species, bald eagle and osprey, are provided in more detail below.

#### **Bald Eagle**

The bald eagle (*Haliaeetus leucocephalus*) (nesting and nonbreeding/wintering) was delisted from the federal Endangered Species Act on August 8, 2007, in the lower 48 states (72 FR 37345). Effective May 1, 2008, the Sonoran Desert area of central Arizona (Sonoran Desert distinct population segment (DPS)) was federally listed as threatened. This DPS covers: (1) Yavapai in northern Mexico; Gila, Graham, Pinal, and Maricopa counties in Arizona; and (2) Southern Mohave County (that portion south and east of the center of Interstate Highway 40 and east of Arizona Highway 95), eastern LaPaz County (that portion east of the centerline of U.S. and Arizona Highways 95), and north of the centerline of Interstate Highway 8) (73 FR 23966). The bald eagle is State-listed as endangered and designated as fully protected by California Fish and Game Code (CFG) § 3511 (CDFW 2018). Bald eagles are also protected under the Migratory Bird Treaty Act (MBTA) (16

U.S.C. 703-712), the Migratory Bird Treaty Reform Act (MBTRA) (Division E, Title I, § 143 of the Consolidated Appropriations Act, 2005, PL 108–447), and the Bald Eagle Protection Act (16 U.S.C. 668-668d, 54 Stat. 250).

Bald eagles inhabit forested areas adjacent to large bodies of water, including lakes, reservoirs, rivers, estuaries, and the coastline. They are opportunistic and will feed on carrion, but actively prey on a variety of fish, mammals, and birds. Breeding begins in early spring in the north and are single-brooded. Nests are built from sticks and branches in a large tree or a rocky outcrop; bald eagles have also been known to nest on the ground on islands. Bald eagles winter in temperate areas typically below 1,640 feet in elevation throughout California. Roost sites are often located in large conifers in the west near aquatic foraging areas. Most breeding territories for bald eagles are in northern California, mainly in mountain and foothill forests and woodlands near reservoirs, lakes, and rivers. Bald eagles have also been observed to nest in scattered locations in the central and southern Sierra Nevada mountains and foothills, in several locations from the central Coast Range to inland southern California, and on Santa Catalina Island.

Both the Project site and the Option 1 helipad flight path comprise a younger stand of Jeffrey pine with tree sizes only marginally suitable for bald eagle nesting. According to the CNDDB, there was an occurrence within approximately 0.5 miles of the Project area, but no nest was observed in the vicinity of this occurrence during the June 3, 2022 surveys.

### Osprey

Osprey (*Pandion haliaetus*) nest sites are considered sensitive by the CDFW. Formerly distributed throughout California, this species has declined significantly since the 1940s and is now mainly found in the northern half of the state. Ospreys breed along the coast, in estuaries, freshwater lakes, reservoirs, and large rivers. Nesting habitat usually requires the presence of snags adjacent to or over open water. The large platform nests are built on snags and sometimes on artificial structures (e.g., poles). Ospreys feed primarily on fish (dead or alive), but rodents, birds, and other small vertebrates are also consumed. Removal of nesting trees, pesticide contamination, and human disturbances (e.g., boating activities) have contributed to this species' decline in California.

Both the Project site and the Option 1 helipad flight path comprise a younger stand of Jeffrey pine with tree sizes only marginally suitable for osprey nesting. Osprey individuals were observed within the regional context of the Project, but no nests were observed in the vicinity of the Project area during the June 3, 2022 surveys.

### **Invasive Species**

An invasive species is a non-native species whose introduction is likely to cause harm to the environment, economy, or human health. EO 13112, Invasive Species, requires federal agencies to prevent the introduction of invasive species and provide for their control to minimize the economic, ecological, and human health impacts caused by invasive species.

#### **3.6.1.2 Critical Habitat and Other Vegetation**

Elevations on the Project site range from 4,535 feet in the southeast corner to 4,550 feet above mean sea level (AMSL) in the northwest corner. The Option 1 flight path site is relatively flat throughout, with elevations ranging between 4,540 and 4,550 feet AMSL. Two soil types are present in the Project and Option 1 sites, and both are well-drained gravel-dominant alluvium consistent with floodplain benches (see **Exhibits L and M**).

The climate of the Project site is transitional *Csb/Dsb* (Warm-summer Mediterranean climate/ Mediterranean-influenced warm-summer humid continental climate). Summers are warm, with average highs in the 80s (Fahrenheit); winters are cool and wet, with average highs in the 40s and average lows in the 20s. The average annual precipitation is approximately 34.35 inches, falling primarily between November and March, with an average annual snowfall of 127 inches.

### **Jeffrey Pine Forest and Woodland Alliance**

The Project site and Option 1 flight path area are dominated by a young stand of assumed planted Jeffrey pines (*Pinus jeffryi*) managed by a local timber company. The habitat meets the criteria for Jeffrey Pine Forest and Woodland Alliance, but it is a semi-natural stand, as it appears to be a plantation with relatively uniform species composition and age. Jeffrey pines dominate the Project area and are accompanied by a shrubby and herbaceous understory, consisting of Sierra gooseberry (*Ribes montigenum*), big sagebrush (*Artemisia tridentata*), tarragon (*Artemisia dracuncululus*), dwarf lupine (*Lupinus lapidicola*), yellow rabbitbrush (*Chrysothamnus viscidiflorus* ssp. *puberulus*), pinewoods horkelia (*Horkelia fusca*), silverleaf phacelia (*Phacelia hastata*), California helianthella (*Helianthella californica*), woolly mule's ears (*Wyethia mollis*), and Oregon grape (*Berberis aquifolium*).

Common wildlife species observed within ruderal communities on the Project and Option 1 sites include American robin (*Turdus migratorius*), Steller's jay (*Cyanocitta stelleri*), dark-eyed junco (*Junco hyemallis*), house finch (*Haemorhous mexicanus*), common raven (*Corvus corax*), downy woodpecker (*Picoides oubescens*), mountain chickadee (*Poecile*

*gambeli*), northern flicker (*Colaptes auratus*) and western fence lizard (*Sceloporus occidentalis*).

The planted Jeffrey Pine Forest and Woodland Alliance accounts for approximately 10 acres on the 11.87-acre Project site and virtually all of the 5.82-acre Option 1 site.

### **Riparian Woodland**

A small area of riparian woodland community extends into the Project site in the northwestern corner and provides habitat for special status species with potential to occur, such as nesting birds. Riparian woodlands are diverse habitats that support numerous plant species, including grasses, annual and perennial forbs, vines, shrubs, and trees. A variety of plants creates a complex layering of understory and overstory which in turn provides habitat to numerous wildlife species. When found within the bed, channel, or bank of any river, stream, or lake, riparian vegetation is also protected under CFGC § 1602, and the CDFW has included riparian communities in the CNDDDB.

Dominant plant species observed within riparian woodland communities on the Project site include woolly sedge (*Carex pellita*), hound's-tongue (*Cynoglossum officinale*), cattails (*Typha sp.*), California mugwort (*Artemisia douglasiana*), paniced bulrush (*Scirpus microcarpus*), sweetberry honeysuckle (*Lonicera cauriana*), willows (*Salix spp.*), and black cottonwoods (*Populus trichocarpa*).

### **Wildlife Corridors**

Wildlife corridors are habitats that provide connectivity between natural communities otherwise separated by urbanization and other development. Wildlife corridors provide access for animals to travel between these communities for seasonal migration, access to overwintering/summering habitat, and breeding, etc. They also allow animals to move away from natural disasters and other forms of habitat loss, as well as to recolonize habitats previously extirpated. Wildlife corridors provide opportunities to breed, forage, migrate/emigrate, disperse, and forage.

Overall, the Project and Option 1 flight path sites show signs of regular disturbance due to historic and present use for logging. Active construction may temporarily interfere with the movement of native wildlife within this wildlife corridor; however, no permanent structures or barriers to movement along the adjacent river channel will occur owing to the proposed Project. In addition, as currently planned, the proposed Project will have no adverse effects on fish movement along this river. This conclusion also applies to Option 1.



### **Developed**

The southeastern corner of Project site is comprised of developed habitat, consisting of parking lots and the current Seneca Healthcare District facility. This area is highly disturbed and consists entirely of concrete and ornamental landscaping. Common wildlife species observed within developed communities on the Project site include dark-eyed junco, house finch, and common raven. The developed habitat accounts for approximately 1.86 acres on the 11.87-acre Project site.

### **Wetland**

There is wetland habitat on and adjacent to the Project site and Option 1 site that is discussed in Section 3.3.1. No other critical habitat was identified on the Project site or Option 1 site.

### **3.6.1.3 Other Fish and Wildlife Species**

The wildlife species identified on the Project and Option 1 sites are discussed in Section 3.6.1.2. No other fish or wildlife species were identified or are expected to occur on the Project and Option 1 sites.

## **3.6.2 Environmental Consequences**

### **3.6.2.1 Listed Threatened or Endangered Species**

#### **Special-Status Plants**

No special-status plant species are expected to occur on the Project site or Option 1 site due to marginally suitable habitat, anthropogenic disturbance, or the lack of specialized habitats and/or substrates such species require. However, without a formal survey, the absence of special-status plant species cannot be confirmed. Impacting special-status plant species would be considered a **significant impact**. However, the impact would be avoided by implementation of Mitigation Measure BIO-1. In order to confirm absence of the listed special-status plant species, appropriately-timed floristic surveys will be conducted prior to initiation of work activities. If special-status plant species are detected during floristic surveys, avoidance measures will be implemented per Mitigation Measure BIO-1, ensuring impacts are reduced to a level considered less than significant.

#### **Special-Status Wildlife**

Although 13 special-status wildlife species have been previously documented in the vicinity of the Project and Option 1 sites, 11 of the species are not expected to occur due to lack of

suitable habitat and/or lack of recent occurrences in the vicinity of the Project site. However, Project activities implemented without Avoidance and Mitigation Measures do have the potential to **adversely impact** nests of both migratory birds as well as osprey and bald eagle, which are special-status raptor species. Implementation of Mitigation Measure BIO-1 would reduce the impact to less than significant.

#### **Invasive Species**

Construction activities on land could result in the transport of invasive weed species onto the project site or outside of the project area through cuttings and seeds attached to vehicles. Likewise, invasive insect species could spread as individuals, larvae, or eggs via transport of cleared vegetation. Therefore, project activities implemented without Avoidance and Mitigation Measures do have the potential to **adversely impact** the project site and surrounding areas, although impacts are expected to be minor and short-term. Implementation of Mitigation Measure BIO-3 would reduce the impact to a level considered less than significant.

### **3.6.2.2 Critical Habitat and Other Vegetation**

Potential effects on the wetland habitat on and adjacent to the Project site and Option 1 site are discussed in Section 3.3.2.

Active construction may temporarily interfere with the movement of native wildlife within the wildlife corridor on the Project and Option 1 sites, but no permanent structures or barriers to movement along the adjacent river channel will occur owing to the proposed Project/Option 1. Accordingly, there would be **no effect** on fish movement along this river.

### **3.6.2.3 Other Fish and Wildlife Species**

**No effect** on other fish or wildlife species would occur as a result of implementation of the proposed Project or Option 1.

## **3.6.3 Mitigation**

#### **Special-Status Plants**

**Mitigation Measure BIO-1: Floristic Surveys.** Appropriately timed surveys for special-status plants shall be conducted in compliance with all CDFW (2018), USFWS (1996), and CNPS (2001) published survey guidelines prior to initiation of work activities. Project (including Option 1) commencement shall not be initiated until special-status plant pre-construction surveys are completed and subsequent

mitigation, if necessary, is implemented. If no special-status plant species are found to inhabit the site, no further mitigation measures would be necessary.

If special-status plant species are detected, individuals shall be clearly marked and avoided. If special-status plants detected during focused surveys cannot be avoided, consultation with CDFW and/or USFWS (depending on listing status) shall occur. As part of this consultation, a mitigation plan shall be developed and approved by the appropriate agencies to avoid all adverse impacts. The mitigation plan shall include methodology of transplanting and/or on-site replanting at a 1:1 (mitigation to impacts) ratio, five-year monitoring program, success criteria (e.g., 70% survivorship threshold), and annual reporting requirements. In addition, this plan shall include worker education and development of appropriate avoidance and minimization measures.

### **Special-Status Wildlife**

**Mitigation Measure BIO-2a: Environmental Training.** Each year prior to the commencement of Project-related activities (including Option 1 activities), a qualified biologist will provide an environmental awareness training program to educate Project personnel on relevant special-status species and their habitats, sensitive/regulated habitats, and applicable environmental laws and permits. The training shall include a description of the species and their habitats, importance of preserving species and habitats, penalties for unauthorized take, and the Project limits.

**Mitigation Measure BIO-2b: Migratory Birds and Raptors (osprey and bald eagle)/Nest Avoidance.** Tree and vegetation clearing (removal, pruning, trimming, and mowing) shall be scheduled to occur outside of the migratory bird nesting season (February 1 through August 31). However, if clearing and/or construction activities will occur during the migratory bird nesting season, then pre-construction surveys to identify active migratory bird and/or raptor nests shall be conducted by a qualified biologist within 14 days of construction initiation on the Project site and within 300 feet (i.e., zone of influence) of Project-related activities. The zone of influence includes areas outside of the Project and Option 1 sites where birds could be disturbed by construction-related noise or earth-moving vibrations.

If active nest, roost, or burrow sites are identified within the Project or Option 1 sites, a no-disturbance buffer shall be established for all active nest sites prior to

commencement of any proposed Project-related activities to avoid construction or access-related disturbances to migratory bird nesting activities. A no-disturbance buffer constitutes a zone in which proposed Project-related activities (e.g., vegetation removal, earth moving, and construction) cannot occur. A minimum buffer size of 50 feet for passerines and 300 feet for raptors shall be implemented; sizes of the buffers shall be determined by a qualified biologist based on the species, activities proposed near the nest, and topographic and other visual barriers. Buffers shall remain in place until the young have departed the area or fledged and/or the nest is inactive, as determined by the qualified biologist. If work is required within a buffer zone of an active bird nest, work may occur under the supervision of a qualified avian biologist. The qualified avian biologist monitoring the construction work shall have the authority to stop work and adjust buffers if any disturbance to nesting activity is observed.

**Mitigation Measure BIO-2c: Bald Eagle and Golden Eagle.** In accordance with the Bald and Golden Eagle Protection Act (BGEPA) (USFWS, last amended 1978), pre-construction surveys for eagles shall be conducted on the Project site and Option 1 site (if applicable) and within 0.5 miles of Project/Option 1 site boundaries. If an active eagle nest is detected within this survey area, the Project proponent shall implement a 0.5-mile no-disturbance buffer around the nest until a qualified biologist determines the nest is no longer active.

### **Invasive Species**

**Mitigation Measure BIO-3: Invasive Species.** Vehicles and construction equipment should be inspected prior to entering the project site, and any soil and plant material shall be washed off equipment or vehicle tires and treads prior to entering the site and before leaving site. Any seed and mulch landscaping used during the course of construction shall comply with state regulations.

## **3.7 Cultural Resources**

### **3.7.1 Affected Environment**

#### **3.7.1.1 Prehistoric Archaeological Resources**

In January 2023 the archaeological consulting firm PaleoWest conducted an archaeological survey of the Project site and the Option 1 flight path to identify potential archaeological resources that could be present within the site and evaluate the potential for proposed

Project activities to adversely affect significant archaeological resources (**Exhibit T4**). The evaluation included a review of archival records at the Northeast Information Center (NEIC) at California State University, Chico, which is part of the California Historical Resources Information System (CHRIS), as well as an intensive archaeological pedestrian survey of the Area of Potential Effects (APE) conducted by PaleoWest Senior Archaeologist Evan Tudor Elliot on June 15, 2022. Katie Holst and Josh Noyer completed a supplemental archaeological pedestrian survey on October 3, 2022.

Surveys were completed by walking the APE using transects spaced no more than 10 feet (3 meters (m)) apart. The purpose of the archaeological surveys was to observe and note the conditions of the APE, including the extent of the hardscape, the overall degree of ground disturbance, and the character and nature of the APE and cultural resources that have yet to be identified in the APE. Archaeologists inspected areas likely to contain or exhibit archaeologically or historically sensitive cultural resources to ensure that if any visible, potentially significant archaeological resources were discovered, they were documented. Photographs and notes documenting conditions of the APE were recorded on FileMaker software, and ArcGIS Collector was used to navigate and collect spatial information. New sites were recorded on California Department of Parks and Recreation (DPR) 523 forms using iPads. Site documentation involved the collection of photographic and spatial data, including site boundary polygons, sketch maps, and location maps. The archaeological investigation also included subsurface testing of the APE, described further below.

The archival search identified a previously-recorded Historic period archaeological site (21-415-KH-001/H) in the eastern portion of the Project site, discussed further in Section 3.7.1.2. It included a Pre-Contact period locus consisting of four obsidian flaked stone artifacts and two cobble tools, including a rhyolitic hammerstone and an isolated shaped cobble handstone (PA6). The locus was identified in a clearing in the mixed conifer forest between two segments of unpaved east-west-trending two-track roads, 20 m north of the Lake Almanor Clinic parking lot. Flakes identified include three small (>3 centimeter (cm) max length; PA1, PA2, and PA3) interior gray obsidian flakes and one larger exterior black obsidian flake (PA4) in an approximately 8.8-m<sup>2</sup> area. The ovoid rhyolitic hand tool or hammerstone (PA5) has shaped margins and one battered edge and is 10 cm long, 7 cm wide, and 6 cm thick. The locus is in an area affected by modern and Historic period land use, including impacts from logging and vehicle traffic. Ground surface visibility in the vicinity of the locus is 40 percent.

PA6 is a shaped and lightly battered Pre-contact cobble tool of local volcanic material. The cobble is an asymmetrical oval with light shaping around the margins and battering on the tapered end, and is 11.0 × 8.5 × 4.5 cm. It was identified in an isolated context within a small wash south of an east-west trending road segment in an area characterized by light tan brown ashy sandy sediments. Surface visibility in the vicinity of the find is 75 percent.

Testing for new Pre-contact loci within Site 21-415-KH-001/H identified in 2022 was completed from November 29 to 30, 2022. PaleoWest archaeologist Katherine Holst acted as Field Director and was supported by archaeologist Maria Hawley. The work was monitored by tribal representatives from the Susanville Indian Rancheria and the Greenville Rancheria. Excavations consisted of 10 shovel test pits (STPs) and one 0.5 x 0.5 m control excavation unit. Six of the STPs were excavated within the locus boundary and four were excavated outside the boundary within 2 meters in each cardinal direction from the boundary, as shown on **Exhibit N**.

The STPs measured 30 cm in diameter and were excavated in 10-cm increments. Sediments from the test units were screened with 1/8-inch mesh screens. STPs were excavated to a minimum of two sterile levels, after which an auger was used to excavate to 50 cm below surface (cmbs), or until a restrictive layer was reached.

One 0.5 x 0.5 cm excavation control unit was also excavated near the center of the site. The target depth was 1 meter below ground surface, excavated in 10-cm increments. The unit was excavated to a maximum depth of 65 cmbs, at which point it was terminated when large cobbles were encountered at the final two levels (40 – 60 cmbs). One small (>3 cm in size) Pre- contact artifact, a black banded obsidian flake, was found in Level 04 (30 – 40 cm). No other cultural materials were observed, and the artifact was reburied when the unit was backfilled.

Test excavations completed within the Pre-contact locus of multicomponent site 21-415-KH-001/H did not reveal an intact subsurface deposit, and PaleoWest concluded that no significant archaeological resources were identified on the Project site.

### **Native American Consultation**

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. §306108), as amended, and its implementing regulations at 36 CFR Part 800, federal agencies are required to consult with Native American Indian tribes and Native Hawaiian organizations that are traditionally or culturally affiliated with areas where development

projects are proposed that might adversely affect cultural resources. Agencies (and applicants) are required to make “reasonable and good faith efforts” to identify all tribes that may have an interest in the proposal’s APE, even though they may not currently inhabit the area, and may in fact be located quite distant from the area affected by the proposal. In accordance with this requirement and with similar State requirements (AB52 and SB18), on behalf of the USDA, the SHD sent letters to representatives of the following seven Native American tribes that have cultural affiliation with the Project area:

- Mooretown Rancheria of Maidu Indians
- Greenville Rancheria of Maidu Indians
- Estom Yumeka Maidu Tribe of the Enterprise Rancheria
- Washoe Tribe of Nevada and California
- United Auburn Indian Community of the Auburn Rancheria
- Susanville Indian Rancheria
- Tsi Akim Maidu

Letters were mailed to the representatives of each of the tribes on November 14, 2022 and again on March 14, 2023, informing them about the proposed Project and inviting them to request consultation or provide input on potential effects to cultural resources that could result from Project implementation. Letters were mailed separately by both SHD and Plumas County. Responses, presented in **Exhibit N1**, were received from all but one of the tribes, the Estom Yumeka Maidu Tribe of the Enterprise Rancheria.

Lucretia Fletcher, administrator of the Greenville Rancheria, responded by phone on November 11, 2022, requesting that the tribe provide a monitor during subsurface archaeological testing of the Project site. Brandi Cooper, Natural Resources Director for the Susanville Indian Rancheria, made the same request via email on November 11, 2022. Accordingly, a tribal monitor from each of these tribes was present during the field work conducted on November 29 and 30, 2022, summarized above.

Darryl Cruz, Cultural Resources Director for the Washoe Tribe of Nevada and California, responded by phone to the letter from SHD on November 29, 2022, stating he would defer consultation to the Greenville Rancheria of Maidu Indians. Anna Starkey, Cultural Director for the United Auburn Indian Community of the Auburn Rancheria, requested no curation of artifacts encountered on the site and, if resources were found but determined to be not significant, requested that they be reburied in a part of the site that would be away from

future disturbance. However, Ms. Starkey stated that if significant cultural resources were encountered during subsurface testing, they would be significant to the tribe.

The former Cultural Director for the Tsi Akim Maidu, Grayson Cooney, responded to the SHD letter by phone on November 21, 2022 and stated he was no Cultural Director for the tribe and did not have updated contact information. Matthew Hatcher, Tribal Historic Preservation Officer for the Mooretown Rancheria of Maidu Indians, responded by letter on March 27, 2023, indicating that the tribe is not aware of any known cultural resources in the area, and declined consultation. An administrative assistant for the Tsi Akim Maidu responded by phone on April 3, 2023 and stated that the tribe is in transition and unable to comment on the Project at this time, but that the Native American Heritage Commission (NAHC) would receive updated contact information for the tribe in the future.

Following the completion of the Cultural Resources Assessment summarized above, including monitoring of the subsurface testing by representatives of the Susanville Indian Rancheria and the Greenville Rancheria, copies of the report were delivered to each of the tribes listed above on May 12, 2023, along with a letter summarizing the results of the investigation and requesting their concurrence with, or objection to, the recommended finding of no historic properties affected within 30 days. The 30-day response period has not yet expired, but to date no responses have been received by USDA or SHD.

### **3.7.1.2 Historic Resources**

The cultural resources investigation by PaleoWest described above in Section 3.7.1.1 included an evaluation of whether any historic properties or resources listed in or eligible for listing in the National Register of Historic Properties (NRHP) or the California Register of Historical Resources (CRHR) are present within the Area of Potential Effects (APE) that could be adversely affected by implementation of the proposed Project and/or Option 1. In compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, PaleoWest completed architectural history and archaeological surveys and evaluated identified archaeological and historic-era resources for NRHP and CRHR eligibility (**Exhibit T4**). Per Section 106 and 36 CFR 800.16[d], the APE is defined by the geographic area where the Project may directly or indirectly alter the character or use of historic properties. The APE for the proposed Project and Option 1 helipad flight path is depicted on **Exhibit O**.

The APE includes the existing Seneca Hospital Campus, which consists of the historic-era hospital (Main Hospital Building), and nine associated ancillary medical buildings (APN 100-



110- 029); Parcel C, which includes the existing clinic and proposed development area (APNs 100- 230-028 and 100-230-029); portions of adjacent parcels owned by the Collins Pine Lumber Company (APNs 100-230-026, 100-230-003, and 100-047-003); and a one-parcel buffer where indirect effects (such as visual or vibration effects) could be reasonably anticipated. The vertical limits of the APE extend from a maximum of 5 feet (ft) below ground surface to a maximum height of 35 ft above ground surface. The width and height of the buffer for indirect effects are proportionate to the proposed height of the new building, the landscape, and planned subterranean activities.

### **Methodology**

The assessment was conducted in conformance with regulations found in Title 54, Chapter 3061 of the United States Code (54 USC 3061) and guided by National Park Service (NPS) National Register Bulletin 15 *How to Apply the National Register Criteria for Evaluation* (2016), the California Office of Historic Preservation (OHP) Technical Assistance Series #7 *How to Nominate a Resource to the California Register of Historical Resources*, and OHP's *Instructions for Recording Historical Resources*. Investigations and evaluations were performed by architectural historians and archaeologists who meet or exceed the Secretary of the Interior's (SOI's) Professional Qualification Standards (PQS) for Architectural History, History, and Archaeology.

As part of the historic property evaluation, PaleoWest reviewed search results from the CHRIS at the NEIC, which included a records search of cultural resource studies and existing cultural resources within the APE and a 0.25-mile (mi) radius. PaleoWest also reviewed the OHP's Historic Properties Directory, which includes information regarding properties listed in the NRHP, CRHR, California State Historical Landmarks, California State Points of Historical Interest, and pertinent historic building surveys. Records search results indicated that no cultural resources have been previously documented within the APE or the 0.25-mi buffer around the APE.

PaleoWest also reviewed the 2021 Master Plan for the Seneca Health Care District, which includes architectural drawings, building construction information, and a historical overview. Additionally, PaleoWest consulted the following U.S. Geological Survey (USGS) quadrangle topographic maps: Lassen Peak, California (1886, 1892, 1894); Westwood, California (1955); Susanville, California (1962, 1968); and Chester, California (1979). Aerial images examined include historical aerial photographs from the Eastman Collection (Eastman 1946a, 1946b, 1955), aerial survey images dated 1973, 1981, 1993, 1998, 2005,

and 2018 (NETROnline 2022), and the University of California, Santa Barbara (UCSB) aerial image collection (UCSB 1962).

On June 3, 2022, PaleoWest completed an architectural history survey of the APE which involved the identification and documentation of 36 buildings in two potential historic districts requiring evaluation for NRHP/CRHR eligibility. Data was recorded using Theodolite HD and ArcGIS Field Maps. Specific attention was paid to the setting, levels of architectural cohesion, and historic integrity of the subject properties to determine whether the Seneca Hospital Campus and Maywood Drive Residences are NRHP/CRHR-eligible and if buildings within the districts are individually eligible and/or contributors to eligible historic districts. Viewsheds to and from the area of proposed construction were also analyzed and documented to confirm the correct extent of the APE and to inform impacts assessments pursuant to Section 106 and CEQA should any resources be recommended NRHP/CRHR-eligible.

### **Findings**

The Maywood Drive Residences district includes 20 one-story tract homes built between 1958 and 1973, located southeast of the Seneca Hospital campus. The residences were recorded and evaluated as a potential historic district. Many homes in the neighborhood have direct views of and pedestrian access to the hospital and were constructed during the same period as the expansion of the SHD campus and post-war expansion in Chester.

Development of the Seneca Hospital District began in 1946 after special districts were created in California to recruit physicians and build and operate hospitals and other healthcare facilities in underserved areas. The creation of these districts facilitated the expansion of rural medicine for returning veterans. The Seneca Hospital Campus district contains 16 buildings, three of which date to the original construction of the hospital in 1950. The Main Hospital Building area at 130 Brentwood Drive includes additions and outbuildings from various years, beginning in 1950.

In addition to prehistoric components, recorded site 21-415-KH-001/H, discussed in Section 3.7.1.1, is a large multicomponent site consisting of Historic period remains of logging activities. Site 21-415-KH-001/H includes 16 recorded historic features and 16 historic artifacts.

PaleoWest evaluated the Maywood Drive residences for eligibility for listing on the NRHP in under at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of our history; or
2. Is associated with the lives of significant persons in our past; or
3. Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction; or
4. Has yielded, or may be likely to yield, information important in history or prehistory.

In order to be eligible for listing in the NRHP, a property must retain sufficient integrity to convey its significance and meet at least one of the preceding evaluation criteria. Should a cultural resource be determined eligible for NRHP-listing, it is considered a “historic property” under 36 CFR 60.4.

Based on a detailed evaluation in conformance with NHPA Section 106, PaleoWest concluded that the Maywood Drive residences are not eligible as an historic district, and no evidence was found to suggest the residences individually possess historical significance under any NRHP or CRHR criteria. PaleoWest also determined that the Seneca Hospital Campus is not eligible for listing in the NRHP or CRHR as a district, nor are any of its buildings or structures individually recommended as eligible. While the Seneca Hospital Campus and Main Hospital Building do possess historical significance under Criterion A/1 for their association with the early development of the California Local Hospital (later Health Care) Districts, they do not retain sufficient historical integrity to convey this significance.

## 3.7.2 Environmental Consequences

### 3.7.2.1 Prehistoric Archaeological Resources

The cultural resource investigation did not identify any significant prehistoric archaeological resources within the APE, which included the Option 1 flight path. Therefore, implementation of the proposed Project, with or without Option 1, is expected to have **no effect** on archaeological resources. In the event that previously undiscovered resources were encountered during site disturbance associated with construction of the Project, compliance with existing State law would ensure that **no significant impact** to archaeological resources would occur.

As per California Health and Safety Codes Section 7050.5 and 5097.98, as amended by AB 2641, of the Public Resources Code, in the event that human remains are encountered during construction, certain requirements are triggered. To reinforce compliance, the following requirements should also be made conditions of approval of the proposed Project, and these conditions should be included on Project construction and design plans:

- a. If any human remains are encountered during any phase of construction, all earth- disturbing work shall stop within 50 feet of the find. The County coroner shall be contacted to determine whether investigation of the cause of death is required as well as to determine whether the remains may be Native American in origin. Should Native American remains be discovered, the county coroner must contact the Native American Heritage Commission (NAHC). The NAHC will then determine those persons it believes to be most likely descended from the deceased Native American(s). Together with representatives of the people of most likely descent, a qualified archaeologist can assess the discovery and recommend/implement mitigation measures as necessary.
- b. If any previously unevaluated cultural resources (i.e., burnt animal bone, midden soils, projectile points or other human-modified lithics, historic artifacts, etc.) are encountered, all earth-disturbing work shall stop within 50 feet of the find until a qualified archaeologist can assess the discovery and recommend/implement mitigation measures as necessary. Depending on the type and significance of the find, subsequent monitoring by an archaeologist or Native American may be warranted. This stipulation does not apply to those cultural resources evaluated and determined not Historical Resources/Historic Properties in the Cultural Resources Technical Report prepared for the Project.

### **3.7.2.2 Historic Resources**

Significant historic resources were not determined to be present on the Project/Option 1 sites. Therefore, the proposed Project, with or without Option 1, would have **no effect** on historic resources.

### **3.7.3 Mitigation**

### **3.7.3.1 Prehistoric Archaeological Resources**

As no significant adverse effects on prehistoric archaeological resources were identified for the proposed Project or Option 1, no mitigation would be required. Compliance with existing State law would ensure that any accidental discoveries made during Project construction would not cause significant adverse effects on prehistoric archaeological resources.

### **3.7.3.2 Historic Resources**

As no significant adverse effects on historic cultural resources were identified for the proposed Project or Option 1, no mitigation would be required.

## **3.8 Aesthetics**

### **3.8.1 Affected Environment**

Plumas County is located within the Sierra Nevada Range of California. The County comprises a variety of aesthetic characteristics; rural, natural, and historic qualities are predominant throughout the County. Scenic resources within the County include mountains, valleys, diverse vegetation, streams and lakes, and picturesque travel routes. Historic and cultural resources also contribute to the aesthetics of the County. These resources include buildings and other structures, historic and prehistoric sites, and historic features and objects. Also included are properties of nationwide, statewide, or local significance having architectural, engineering, scientific, economic, agricultural, educational, social, political, military, and cultural values. Examples of historical and cultural resources are historic buildings and neighborhoods, ceremonial and/or sacred sites, quarries, mills, ranch homes and barns, and cemeteries.

The history of the valleys and towns of Plumas County has influenced the built environment and, therefore, contributes to community character. Historic resources are visible from many local scenic roads and highways, including State Routes (SRs) 49, 70, 89, and 284. There are no State-designated scenic highways in Plumas County. However, the 2035 General Plan designates scenic roads, including some State highways, and applies design standards to those County-designated scenic roads. None of the State or County roads accessing the Project site are designated scenic highways or considered scenic roadways in the 2035 Plumas County General Plan.

Scenic areas throughout the County play a major role in the character of the County. The scenic areas identified by the 2035 General Plan are designed to maintain the County's

natural and rural characteristics, preserve historic lifestyles, and attract tourists. In addition, the 2035 General Plan sets forth requirements to protect and preserve cultural and historic resources. The Project site is not located within any designated scenic area.

The Project site is located outside of the Chester Design Review Area and thus is not subject to the Chester Design Review Guidelines. The 2035 General Plan contains policies that are mitigating policies designed to minimize potential impacts.

An applicable mitigating policy includes:

***Conservation and Open Space (COS) 7.2.14 -- Natural Landscapes in Site Design***

*The County shall encourage the integration of natural landscapes, such as rivers, streams, lakes, ponds, wetlands, and riparian areas, into new development in such a way as to enhance the aesthetic and natural character of individual sites while avoiding the destruction, disturbance, and fragmentation of these natural landscapes.*

### **3.8.2 Environmental Consequences**

The proposed Project will have **no impact** on a scenic vista. Although the visual character of the Project site would be altered due to construction of healthcare facilities, parking lots, and associated features, existing open space and vegetation will be maintained on the peripheries of the site, as evidenced by the proposed Project site plan. The proposed Project has been designed to avoid the adjacent stream, wetland and riparian areas on site, while retaining these features as a natural component of the site design. Therefore, the Project would have a **less-than-significant impact** on the visual character of the Project site.

**No significant impacts to scenic resources** are anticipated to occur because of this Project. The Project will require some modification of scenic resources, including tree removal, but not sufficient to create a significant impact on the surrounding visual setting, as forested habitat is abundant in the vicinity. The Project site is not located within the boundaries of a designated scenic area.

Project construction would likely include the addition of new light sources (i.e., interior and exterior building lighting) that would introduce additional nighttime lighting to the Project site and vicinity. The introduction of light from the new building could be noticeable to viewers in the surrounding area, but this impact would be **less than significant**. Plumas

County Code Section 9-2.411 requires that all lighting be installed to focus away from adjoining properties.

The Project would have **no impact** on a State-designated scenic highway, and would not significantly degrade a scenic vista, the scenic character of the Project vicinity, or produce substantial light or glare.

The aesthetic impacts of Option 1 would be as described for the proposed Project, with additional tree removal to accommodate the helicopter flight path totaling approximately 5.5 acres, and lighting of the heliport to accommodate occasional nighttime flights. Operation of the heliport during helicopter transport of patients would involve the use of temporary lighting of the heliport during ingress and egress of helicopters. Helicopter transfers historically have averaged about six to seven transports per month, with peak numbers of transports in summer months when there are fewer dark/dusk/dawn hours per day. Few flights other than to transfer the most critically and acutely ill or injured patients would be expected to occur at night. Heliport lighting would be pilot-controlled through a radio frequency (similar to the runway lights at Rogers Field) and/or facility controlled. The helipad would have outline lighting and windsock lighting, but has been designed to minimize light splash and is directional for inflight visibility. This will be similar to runway and taxiway lighting at an airport but used infrequently as discussed above. Other lighting would include path lighting of the transitional walkway, and motion-sensing lights facing away from the helipad. This lighting would be focused downward on a small area on the ground and would produce very minimal light pollution.

### **3.8.3 Mitigation**

No mitigation for aesthetic impacts is required as no significant impacts were identified.

## **3.9 Air Quality**

### **3.9.1 Affected Environment**

Plumas County is located within the Mountain Counties Air Basin, a relatively large air basin located entirely within the Sierra Nevada range. The Northern Sierra Air Quality Management District (NSAQMD) regulates air quality conditions within the Mountain Counties Air Basin. The majority of Plumas County is in attainment or unclassified for all National Ambient Air Quality Standards (NAAQS). However, the Greater Portola Area has been designated by the United States Environmental Protection Agency (US EPA) as a federal “non-attainment” area for PM<sub>2.5</sub> (dust/particulate matter 2.5 microns in diameter

or smaller), meaning that air pollution exceeds National Ambient Air Quality Standards (NAAQS) for fine particulate matter (PM<sub>2.5</sub>) in the Greater Portola Area. In response, the Northern Sierra Air Quality Management District issues both outdoor and indoor wood burning prohibitions, which includes use of wood stoves, fireplaces, fire pits, and cookstoves. EPA-certified wood burning devices are exempt from this prohibition. The City of Portola also has an ordinance prohibiting open burning of yard waste within city limits. The Greater Portola Area non-attainment area covers approximately 13 percent of Plumas County and is located approximately 50 miles southeast of Chester on the east (opposite) slope of the Sierra Nevada; it does not include Chester. Prevailing winds in the region are north-to-south and west-to east.

Plumas County is currently designated as non-attainment for PM<sub>2.5</sub> and PM<sub>10</sub> based on California Ambient Air Quality Standards (CAAQS) administered by California Air Resources Board (CARB). Trends are likely to continue because the primary causes of PM<sub>10</sub>, such as road dust and wildfires, are not expected to decrease in the foreseeable future. These non-attainment designations are based on annually collected data from air quality monitoring stations located in Chester, Quincy, and Portola. The County's largest sources of particulate matter are unpaved road dust, wildfires, prescribed burning, residential heating with wood fuels, residential burning, windblown dust, and vehicle exhaust. Lack of air mixing and dispersal in valleys also contributes to localized air quality issues.

NSAQMD is responsible for the preparation of plans for the attainment and maintenance of AAQS goals, adoption and enforcement of rules and regulations for sources of air pollution, and issuance of permits for stationary sources of air pollution. NSAQMD enforces the Rules and Regulations of Northern Sierra Air Quality Management District (Rules and Regulations). The clean air strategy of NSAQMD includes developing and implementing air quality plans that identify the amount of pollution in the air, its source(s), and strategies to control air pollution. Further, NSAQMD conducts preliminary review of proposed projects in Plumas County to identify potential concerns regarding project effects on air quality. The significance criteria established by the air quality management district may be relied upon to make the significance determinations, where available.

### **3.9.2 Environmental Consequences**

Some emissions of air quality pollutants would occur during construction of the proposed Project as well as during post-construction operations of the facility. The dry, windy climate throughout the County during summer months creates a potential generation of dust when soil is disturbed. Dust caused by soil disturbance during construction would



potentially contribute to levels of PM<sub>2.5</sub> for which a portion of Plumas County (Greater Portola Area) is non-attainment, based on state standards administered by CARB and federal standards administered by the EPA. Although the Chester area is in attainment with the NAAQS for PM<sub>2.5</sub>, it is non-attainment with the CAAQS for both PM<sub>2.5</sub> and PM<sub>10</sub>.

Operation of heavy construction equipment would generate emissions of criteria air pollutants (CAPs), and grading and clearing activities would generate fugitive dust, including PM<sub>2.5</sub> and PM<sub>10</sub>. Increased pollutant emissions would also be generated by construction workers traveling to and from the site. However, the construction contractors would be subject to and comply with all statewide regulations regarding diesel equipment and vehicles, which control for construction vehicle emissions.

The NSAQMD regulates fugitive dust through Regulation II Rule 226: Dust Control, which requires that individuals “take all reasonable precautions to prevent dust emissions.” The Air Pollution Control Officer (APCO) may require actions such as the use of water to control dust. According to the California Emissions Estimator Model Version 2022.1 (CalEEMod<sup>®</sup>), a statewide program designed to calculate CAP and greenhouse gas (GHG) emissions for development projects in California, fugitive dust from material movement (grading, dozing, truck loading) can be reduced by 61 percent by watering twice per day (every 3.2 hours) and 74 percent by watering three times per day (every 2.1 hours). Similarly, CalEEMod assumes on-road fugitive dust can be reduced by 55 percent through twice per day watering. Watering and other dust control measures, mandated through NSAQMD, are effective at keeping impacts below applicable thresholds.

Off-road diesel-fueled equipment generates emissions of CAPs, toxic air contaminants (TACs) and GHGs. Off-road equipment is regulated by the US EPA and CARB. Effective January 2011, both the US EPA and the CARB adopted so-called Interim Tier 4 standards for new equipment with diesel engines of 175 horsepower (hp) or greater. The interim Tier 4 emissions standards for particulate matter are about 85 percent more restrictive than previous particulate matter emissions standards (Tier 2 or Tier 3, depending on the size of the engine) for these larger off-road engines. As a result, use of engines that meet the interim Tier 4 standards would reduce diesel exhaust emissions of particulate matter by approximately 85 percent, compared to engines produced under the previous standards.

Based on an evaluation by the environmental consulting firm Ramboll (**Exhibit T5**), conformance with applicable requirements for diesel equipment and vehicles is expected

to be sufficient to adequately limit short-term air quality impacts on sensitive receptors during construction; impacts would be less than significant.

Operational emissions from the proposed Project would include on-road mobile vehicles associated with employees, emergency services, and patients/visitors; building electricity and natural gas use; wastewater treatment; solid waste handling and disposal; landscaping maintenance; application of architectural coatings; and use of consumer products. The Project would also include operation of a diesel generator during power outages.

In 2012, CARB approved the Advanced Clean Cars (ACC) program, a new emissions-control program for non-commercial passenger vehicles and light-duty truck for model years 2017–2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles (ZEVs). In 2022, CARB developed the ACC II regulations to augment the State’s growing zero-emission vehicle market and robust motor vehicle emission control rules to meet more aggressive tailpipe emissions standards and ramp up to 100 percent zero-emission vehicles. The regulations are two-pronged. First, they amend the ACC program to require an increasing number of ZEV sales. The ACC II regulation will rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035. By 2035, new passenger cars, trucks and sports utility vehicles sold in California will be 100 percent zero emissions. These amendments support Governor Newsom’s 2020 Executive Order N-79-20 that requires all new passenger vehicles sold in California to be zero emissions by 2035. Second, the Low-emission Vehicle Regulations were amended to include increasingly stringent standards for gasoline cars and heavier passenger trucks to continue to reduce smog-forming emissions while the sector transitions toward 100 percent electrification by 2035.

The Project is scheduled to start operating in 2026, which is the year ACC II comes into effect. Therefore, ACC II’s increased requirements on ZEV sales will directly affect the fuel types of on-road light duty fleets in Plumas County and the Project. As a result, the increased ZEV sales and fleet mix change will lead to a decrease in average emission rates of on-road light duty vehicles. Such a reduction in average vehicle emission rates brought by the ACC II can help mitigate the Project emissions contributed by the 7-percent increase in vehicle miles traveled (VMT) that is expected from Project implementation, and will reduce overall Project mobile source emissions. The emission reduction impacts brought by ACC II will grow substantially over time along with the ZEV penetration increase.

Therefore, it is also expected that the Project mobile source emissions will continue to decrease over time.

Emissions from the proposed diesel generator are regulated under Airborne Toxic Control Measure for Stationary Compression Ignition Engines (17 CCR section 93115), which limits use to 50 hours per year for non-emergency testing of emergency generators. Per NSAQMD, stationary or portable diesel-fired engines greater than 49 horsepower must be permitted under Regulations IV and V. The NSAQMD permitting process requires the applicant to provide information such as fuel consumption rate, emission factor data, operating schedule, and whether the equipment is located within 1,000 feet of a school. With the provided information, NSAQMD will issue a permit with conditions such that the generator does not create adverse air quality or health impacts.

The Project may also include Option 1, the creation of a helipad for emergency medical transport by helicopter. However, emissions from helicopter flights would not be a new use; helicopter transport to and from the existing SHD hospital currently occur, with landings and take-offs happening at Rogers Field Airport, which is located about 1 miles south of the Project site. Historical data indicates the number of flights ranges between approximately 65 and 80 flights per year, which equates to one or two flights per week. The Project would not significantly change the flights per year or localized emissions generated during the take-off and landing of the helicopter. The project would allow for changes to the flight path of the helicopters, which would not have a material impact on the air quality emissions of the project.

Based on their analysis, Ramboll determined that the air quality impacts from construction and operation of the proposed Project, including Option 1, would not be significant, given compliance with existing regulations discussed above.

### **3.9.3 Mitigation**

No potentially significant impacts to air quality would result from Project implementation; therefore, no mitigation is required.

## **3.10 Socio-Economic Impact/Environmental Justice**

### **3.10.1 Affected Environment**

Plumas County is considered one of the most rural counties in California. According to the U.S. Census Bureau, Plumas County had a population of 20,007 in 2010, comprising only

0.05 percent of the population of California. Growth in the County was also below that experienced in the rest of the state. Between 2000 and 2010, Plumas County's population decreased at an average annual rate of 0.4 percent, while the State of California's population increased at an average annual rate of 1.0 percent. In 2020, the population dropped to 19,790. The population in Chester in 2020 was just 2,088 persons, according to the Census Bureau.

The proposed facility will typically have a staff of about 48 employees on site at peak hours. The conceptual plan includes construction of up to ten (10) 1,000-square-foot residential units that will house up to ten employees of SHD and their families.

### **3.10.2 Environmental Consequences**

SHD's staff currently entails approximately 100 full-time equivalent (FTE) positions, numbering about 115 employees on payroll. The proposed replacement facilities would entail approximately 120 FTE positions, numbering about 135 to 140 employees. For both FTEs and total numbers of employees, these represent increases of approximately 20 percent. Approximately 60 percent of Seneca HCD's current employees reside in SHD's primary service area (Lake Almanor basin and Westwood), 20 percent from surrounding communities (Susanville and Greenville), and 20 percent from out of the area/beyond 30 miles. Any new employees would probably be distributed in a similar manner, so of 20 to 25 new employees, approximately 12 to 15 would be expected to reside locally. At approximately 2.5 people per household, this would entail an estimated 30 to 38 new residents in the Lake Almanor basin and Westwood area, which would be a negligible increase in the local/regional population. Furthermore, given a declining population, the new residents would merely offset some of the recent population losses. Between 2010 and 2020, Plumas County's population declined 3.2 percent (261 residents), the highest decline in California.

The addition of up to 25 new employees, approximately 12 to 15 of them residing locally, would not add to or create traffic congestion in and around Chester. The vehicle trips associated with these employees would be dispersed both spatially and temporally, since they would be working varied shifts, on varied days, and would be traveling to and from varied locations. Due to the relatively dispersed nature of development in Plumas County, traffic congestion is not an issue, except for "bell times" at some school areas and some locations around Lake Almanor during the summer months. If it is conservatively assumed that 15 of the new employees would be traveling to/from work at the SHD facility at the same time and on the same routes, this would not create appreciable congestion or delays

on county roads and highways, and it would not substantially increase the risk of automobile accidents.

The incremental increase in Plumas County's population could have a minor incremental positive effect on businesses in Chester and in the communities where new SHD employees resided. Procurement of supplies by the hospital could similarly provide an incremental boost to area businesses.

The proposed Project includes the addition of 10 housing units to house SHD staff. These units would primarily house itinerate and long-term, non-local medical staff, thus lessening SHD's contribution to the conversion of local housing to short-term rental units.

Based on the considerations enumerated above, the Project would have a ***less-than-significant socioeconomic impact***.

### **Environmental Justice**

To determine whether the proposed Project could disproportionately result in adverse effects on disadvantaged populations, such as people of color or low-income populations, EJScreen, an environmental justice screening and mapping tool developed by the US EPA was queried. EJScreen utilizes nationally-consistent data to highlight vulnerable communities overburdened by population.

A 1-mile search radius was established around the Project site that aggregates appropriate portions of the U.S. Census block groups encompassed by the area, weighted by population, to create a representative set of data for the entire search radius, honoring variation and dispersion of the population in the block groups within it. EJScreen produces numerous environmental justice indicator values for the search area, averaged over all residents who are estimated to be inside the search radius. The indicators combine demographic information with a single environmental indicator (e.g., proximity to traffic) to help identify communities that may have a high combination of environmental burdens and vulnerable populations. The report generated by EJScreen is presented in **Exhibit P**. The report indicates that the search area has a population of approximately 1,868 persons.

The Project vicinity was scored on 12 environmental justice (EJ) indexes, including particulate matter (PM<sub>2.5</sub>), ozone, diesel particulate matter, air toxics, lead paint, proximity to Superfund cleanup sites, proximity to hazardous waste facilities, and proximity to underground storage tanks, among others. In comparison with statewide data, the project area scored extremely low on many EJ indexes, many falling in the 0 percentile. The highest

index was the ozone index, which was in the 35<sup>th</sup> percentile. This means that 65 percent of the State's residents are exposed to higher levels of ozone.

When compared to nationwide data, the Project search area scored considerably higher. The highest index was again the ozone index, which was in the 62<sup>nd</sup> percentile in comparison with nationwide data. The next highest index was wastewater discharge, with a score of 46 (i.e., 46<sup>th</sup> percentile), followed by lead-based paint (43), particulate matter (40), and air toxics respiratory health hazard (29).

Some insight into the vulnerability to these hazards is provided by ten socioeconomic indicators rated in the EJScreen report. The results include the following:

- People of color comprised 12 percent of the population, while 63 percent of the State's population identify as people of color. This places the study area in the 3<sup>rd</sup> percentile Statewide.
- Low-income residents (households where household income is less than or equal to twice the federal "poverty level" defined by the U.S. Census Bureau, which was \$26,496 in 2020) comprised 24 percent of the population, versus 29 percent Statewide, placing the study area in the 48<sup>th</sup> percentile.
- There is an unemployment rate of 1 percent in the study area, in comparison with the 6-percent rate for California, placing it in the 19<sup>th</sup> percentile.
- Residents without a high school education comprise 8 percent of the study area population, while 16 percent of California residents lack a high school education, placing the Project area in the 43<sup>rd</sup> percentile.
- While just 2 percent of the population in the study area is under age 5 (6 percent Statewide), 34 percent is over age 64 (14 percent Statewide), placing it in the 94<sup>th</sup> percentile in the over age 64 indicator.
- The second-highest socioeconomic indicator was low life expectancy, scoring the in the 79<sup>th</sup> percentile Statewide and in the 61<sup>st</sup> percentile nationwide. Approximately 21 percent of residents in the study area are estimated to have a low life expectancy, based on data and parameters defined by the Centers for Disease Control (CDC) and National Center for Health Statistics (NCHS), National Association for Public Health Statistics and Information System (NAPHSIS), and the Robert Wood Johnson Foundation.

Overall, the EJScreen results demonstrate that the Project study area is well below average on environmental justice indicators in comparison with California and U.S. totals, meaning there is a lower probability for disadvantaged populations to be disproportionately exposed

to environmental hazards. The study area generally ranks in low percentiles both in environmental hazard indicators as well as population vulnerability indicators. Furthermore, as documented in this Environmental Assessment, implementation of the proposed Project is not expected to create or expose people or the environment to significant environmental hazards. Therefore, the environmental justice ***impact would not be significant.***

### **3.10.3 Mitigation**

No environmental justice impact was identified, so no mitigation is required.

## **3.11 Noise**

### **3.11.1 Affected Environment**

Noise is usually defined as unwanted sound. It is an undesirable by-product of normal day-to-day activities. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. The definition of noise as unwanted sound implies that it has an adverse effect on people and their environment. Noise is measured on a logarithmic scale of sound pressure level known as a decibel.

Noise sources occur in two forms: (1) point sources, such as stationary equipment, loudspeakers, or individual motor vehicles; and (2) line sources, such as a roadway with many point sources (motor vehicles). Sound generated by a point source typically diminishes (attenuates) at a rate of 6.0 A-weighted decibels (dBA) for each doubling of distance from the source to the receptor at acoustically “hard” sites and 7.5 dBA at acoustically “soft” sites. For example, a 60-dBA noise level measured at 50 feet from a point source at an acoustically hard site would be 54 dBA at 100 feet from the source and 48 dBA at 200 feet from the source. Sound generated by a line source typically attenuates at a rate of 3.0 dBA and 4.5 dBA per doubling of distance from the source to the receptor for hard and soft sites, respectively. Sound levels can also be attenuated by human-made or natural barriers.

Sensitive receptors are facilities where sensitive receptor population groups (children, the elderly, the acutely ill, and the chronically ill) are likely to be located. These land uses include residences, schools, playgrounds, childcare centers, retirement homes, convalescent homes, hospitals, and medical clinics. The proposed Seneca HCD Hospital and the adjacent Wildwood Village retirement apartments are sensitive receptors.

The dominant sources of noise in Plumas County are mobile, related to vehicle traffic (including truck traffic), aircraft flights, and train transportation. Common stationary sources in the County include lumber mills, aggregate mining, and processing facilities. To a lesser extent, construction sites are also considered a stationary source of short-term, or temporary, noise in the County. Common noise sources within Plumas County are the main roadways, railroads, stationary industrial activities, and airports.

Traffic contributes to noise within the County. The primary factors that determine roadway noise levels are traffic volumes, the percentage of heavy trucks and buses on individual roadways, average vehicle speed, and presence of natural or human-made noise attenuation features such as walls and landscaping. Given the predominantly rural nature of the County, roadway noise impacts are those associated with the larger regional, or Statewide, network.

The traffic volumes on County roadways are relatively low, with most roadways experiencing fewer than 3,000 vehicles per year. The 24-hour average decibel (dB) level associated with most of the County's roadways is typically between 65 dB and 70 dB.

The second significant contributor to noise within the County are railroads. Plumas County has two active rail lines used by the Union Pacific Railroad (UPRR) and the Burlington Northern Santa Fe Railway (BNSF). While both lines are primarily used for freight and local shipping, a portion of the UPRR line through the Feather River Canyon is recognized as a scenic route, with occasional chartered passenger trains. Daily traffic on the UPRR and BNSF lines in the County consists of a limited number of trains per day. This volume creates minimal noise impacts in terms of frequency. There have been no active railroads in the vicinity of Chester since the Almanor Railroad operated by Collins Pine was decommissioned in 2009.

Three public use airports are in the County: Rogers Field Airport in Chester, Gansner Field Airport in Quincy, and Nervino Airport in Beckwourth. Airport noise caused by aircraft depends primarily on the type of aircraft and the frequency and direction of flights, with specific noise events caused by aircraft flyovers, takeoffs, and landings. Noise from aircraft warming up early in the morning can also be a significant noise source from airports. In addition, helicopter-generated noise is common due to helipads being located at Rogers Field Airport, Gansner Field Airport, Nervino Airport, Indian Valley Hospital in Greenville, Eastern Plumas Health Care facility in Portola, and Plumas District Hospital in Quincy.



The Project is located approximately 1.1 miles from the nearest airport, Rogers Field, within the Airport Influence Area (AIA) (Safety Compatibility Zone 6). Although persons residing or working in the Project area may notice airport noise from takeoffs and landings occasionally, it is not anticipated that the rural county airport creates excessive noise at the Project site, due to its location.

The Plumas County 2035 General Plan identifies Rogers Field Airport, Collins Pine Sawmill, and Chester Pit Mine (at Chester Rogers Field) as prominent noise sources in the community of Chester. The Project site is located approximately 0.5 mile from Collins Pine Sawmill and 1.35 miles from Chester Pit Mine; the distance to Rogers Field Airport was noted above.

Stationary noise sources also contribute to the noise throughout the County. One of the temporary, stationary noise sources is construction. Construction crew commutes and the transport of construction equipment and materials to construction sites incrementally increases noise levels on access roads leading to the sites. Noise is further generated during excavation, grading, and construction of structures. Construction typically occurs in discrete steps, each of which has a distinctive mix of equipment and, consequently, distinctive noise characteristics. These various sequential phases change the character of the temporary construction noise generated on each site and, therefore, the noise levels surrounding these sites as construction progresses.

Most jurisdictions in California regulate construction noise through ordinances and/or general plan policies restricting the permitted hours of construction. Construction activities performed during the permitted hours are generally deemed to have less-than-significant noise impacts unless they include activities that are particularly loud.

Although Plumas County does not have an ordinance in relation to construction noise, the 2035 General Plan does contain the following policy for construction noise associated with discretionary approvals:

#### **3.1.4 Construction Noise**

*The County shall seek to limit the potential noise impacts of construction activities on surrounding land uses. The standards outlined below shall apply to those activities associated with actual construction of a project if such construction occurs between the hours of 7 a.m. and 7 p.m., Monday through Friday and 8 a.m. and 5 p.m. on weekends or on federally recognized holidays. Exceptions are allowed if it can be*

*shown that construction beyond these times is necessary to alleviate traffic congestion and safety hazards.*

### **3.11.2 Environmental Consequences**

Short-term (construction-related) and long-term impacts of the Project were addressed in the Noise Analysis for the Seneca Hospital Replacement Project (**Exhibit T6**). The Project has the potential to expose local sensitive receptors to both short- and long-term noise impacts. The Project would not generate or expose people to excessive ground-borne vibration and noise levels or expose staff or patients to excessive noise owing to proximity to an airport or other source of loud noise.

Any construction noise resulting from construction of the facility would be temporary. The project would be required to comply with the allowed construction hours stipulated in Plumas County General Plan Policy 3.1.4. With compliance with this policy, the project would have a ***less-than-significant construction noise impact***.

The Project's operational noise without Option 1 would be limited to vehicular traffic generated by workers (doctors, nurses, administrators, support staff), patients, and visitors traveling to and from the facility and by delivery, maintenance, and waste collection trucks. As discussed in Section 3.12, Transportation, implementation of the proposed Project is expected to increase vehicle miles traveled (VMT) by 6.8 percent, increasing from 4,140 to 4,420 VMT per day. Because a doubling of vehicle traffic is required to achieve a just-perceptible 3-dBA increase in ambient noise along a roadway corridor, the vehicular traffic from Project operation would have ***no impact***.

The Option 1 helipad would shift existing hospital-related helicopter traffic from Rogers Field Airport to the optional area just to the west of the primary Project site. This would introduce new periodic noise to the Project vicinity. Helicopter transfers to and from the existing Seneca Healthcare hospital historically have averaged about six to seven transports per month, with peak numbers of transports occurring in summer months. Hence, the Option 1 Project component would introduce a comparable number of helicopter take-offs and landings to the hospital vicinity, utilizing the flight path depicted on **Exhibit A3**. While this would introduce a new source of noise, the noise at ground level would be elevated for just a few minutes at most.

According to the noise analysis, rotor and engine noise generated by the most common model of helicopter ambulance servicing Seneca Healthcare District—the Eurocopter

EC130, the quietest in its class of light-transport helicopters—will be on the order of 85.5 dBA at the source, 56 dBA at an attenuation distance of 30 feet, and 36 dBA at an attenuation distance of 300 feet. The proposed helipad will be more than 300 feet from the nearest residential structure, so it is estimated that exposure of nearby residents to helicopter noise generated at the heliport will be less than 36 dBA. This is less than the sound of a passing car at 50 feet.

It should be noted that these are highest instantaneous peak noise levels, while most ambient noise standards are established for a 24-hour average that is weighted to reflect greater human sensitivity to nighttime noise (adding 10 dBA to noise levels occurring from 10:00 p.m. to 7:00 a.m.), referenced as DNL (day/night average sound level). Some noise standards reference a very similar daily average that weights nighttime levels by 5 dBA. This is referred to as the Community Noise Equivalent Level (CNEL). DNL and CNEL are often used interchangeably.

The highest instantaneous peak noise levels from helicopter flights occurring periodically for a few minutes would have a negligible effect, if any, on exterior DNL noise levels in the Project vicinity, which are already low.

With a noise level of 36 dBA at the nearest residence, indoor noise levels would be even lower. Sound transmission through exterior walls and windows of average construction is reduced by about 20 dBA with windows closed. Given that Title 24, Part 2, California Code of Regulations establishes an interior noise standard of 45 dBA DNL for residential space, noise from periodic helicopter flights would not result in substantial noise levels at neighboring residences, either indoors or outdoors, even if the 36 dBA was a DNL measurement.

Helicopter noise could be more disturbing to hospital patients, due to their closer proximity to the source and their greater sensitivity to noise. However, the noise levels would still be attenuated to below 45 dBA indoors, and any residual intruding sound could be masked by interior noise levels in the hospital. With helicopter flights occurring only six or seven times a month and landing or takeoff noise lasting for a few minutes at most (most likely for less than 30 seconds), this minor noise would not be significant.

Based on the above assessment, the Option 1 helipad component of the Project would have a ***less-than-significant operational noise impact***.

### **3.11.3 Mitigation**

No noise mitigation would be required. However, the following noise-reduction measures could be implemented by SHD to further reduce the effect of helicopter noise on hospital occupants and neighboring residents:

- Preferentially contract with air ambulance services that use the Eurocopter EC130.
- Where feasible, retain trees within 50 to 100 feet of neighboring residential properties to soften the acoustic environment.
- Incorporate acoustic barriers in the walls of the hospital facilities facing the heliport or construct a sound-attenuation barrier next to the hospital, facing the heliport.
- Plant sound-attenuating landscaping between the helipad and sensitive receptors to soften the acoustic environment.
- Provide guidance and training to helicopter pilots in flight procedures to reduce noise impacts during ingress and egress.

## **3.12 Transportation**

### **3.12.1 Affected Environment**

The State highway system provides the key inter-community roadway links within Plumas County. East-west access across Plumas County is provided by SR 36 in the northern portion of the County and by SR 70 in the central/southern portions of the County, while SR 89 provides north-south access across the County. SR 147 serves the east side of Lake Almanor, while SR 49 and SR 284 provide access south toward Loyalton and north to Frenchman Reservoir in the far eastern portion of the County. County roads (and city roads in Portola) also provide important access, as do Forest Service roads. In total, there are 1,823 miles of public roadway in Plumas County, including 935 miles of US Forest Service roads, 674 miles of County roadways, and 182 miles of State highways.

Due to the relatively dispersed nature of development in Plumas County, traffic congestion is not an issue, except for “bell times” at some school areas and some locations around Lake Almanor during the summer months. SR 70 in Quincy is the busiest highway in Plumas County, with a peak-month, typically August, Average Daily Traffic (ADT) volume of 12,200. Other relatively busy locations are on SR 36 in Chester (7,900 ADT) and SR 70 in Portola (7,800 ADT). Overall, peak month volumes on State highways in Plumas County have declined by 12 percent over the last 10 years. The decline has been seen in all regions of

the County. Caltrans counts of all trucks countywide have declined by 15 percent since 1992. However, the number of the largest trucks (5 axle and above) has climbed by 45 percent over this same period, particularly along SR 70.

Public transit is also provided in the County by Plumas Transit Systems through several fixed routes that can be deviated by up to 0.75-mile for riders with disabilities. The service carries approximately 30,000 passenger-trips annually and is available to everyone. The transit service is heavily used by clients of County social service agencies and Feather River College students. There are three daily routes providing service between Chester and Quincy, located approximately 30 miles southeast of Chester.

Plumas County does not have regular passenger rail service, but there are two active freight rail operations. Union Pacific Railroad (UPRR) operates a line connecting Roseville, CA to the west with Salt Lake City, UT to the east. Burlington Northern Santa Fe (BNSF) Railway operates track from Keddie and along Lake Almanor into Lassen County and Oregon. Daily traffic on the UPRR and BNSF lines in the County consists of a limited number of trains per day. Chartered passenger trains are occasionally run on a portion of the UPRR line through the Feather River Canyon, which is recognized as a scenic route.

While there are no commercial airports in Plumas County, there are three publicly owned airports: Rogers Field in Chester, Gansner Field in Quincy, and Nervino Airport in Beckwourth. These airports serve approximately 44,000 operations (takeoffs and landings) annually. In addition to the airports, the Plumas District Hospital in Quincy, the Indian Valley Health Care District in Greenville, and the Eastern Plumas Hospital in Portola have heliports.

While there are many hiking trails in Plumas County, bicycle and pedestrian facilities along main travel corridors and in communities are limited. The Almanor Rail Trail is a 12-mile project, beginning in Chester and following the Collins Pine Rail Trail through the Olsen Barn Meadow, across the Causeway, along Lake Almanor and ending at Clear Creek Junction and Highway 147. Another proposed 1.4-mile proposed project would link Chester at First Avenue to the "super ditch" on the Lassen National Forest.

### **3.12.2 Environmental Consequences**

According to the SHD, the proposed Project is expected to result in increases in staff size, patient capacity, and visitors of 20 to 30 percent, and this is expected to have a comparable effect on vehicle trip generation. **Table 2** provides an estimate of the likely

increase in vehicle miles traveled (VMT) resulting from the proposed Project. The additional VMT attributed to visitors is expected to be nominal.

**Table 2. Current and Anticipated Project VMT per Day**

	<b>% Employees</b>	<b>Number of Employees</b>	<b>Median Trip Miles</b>	<b>Estimated VMT/Day</b>
<b>Current Estimated Trip Miles</b>	60%	69	10	690
	20%	23	50	1150
	20%	23	100	2300
	<b>Estimated Current VMT/Day</b>			<b>4140</b>
<b>Anticipated Est. Project Trip Miles (incl. housing units)</b>	7%	10	0	0
	55%	72	10	715
	19%	25	50	1235
	19%	25	100	2470
	<b>Estimated Proposed VMT/Day</b>			<b>4420</b>
	<b>Estimated Increase in VMT/Day</b>			<b>280</b>
<b>Estimate % Increase in VMT/Day</b>			<b>6.8%</b>	

The proposed Project, including Option 1, would not cause a substantial increase in traffic at area intersections, including Reynolds Road and State Route 36. It would not create any sharp curves or otherwise create or increase traffic hazards due to a design feature. All access points would be installed under encroachment permits issued by the Department of Public Works. Two access routes to the proposed Project would be established: a primary access route via Reynolds Road and a secondary emergency access route via Riverwood Driver and Brentwood Drive (see **Exhibit S**). The proposed Project would provide for adequate emergency access.

The parking needed to accommodate the proposed Project operations would be provided on the Project site and would not affect local street parking or parking at neighboring businesses.

### **3.12.3 Mitigation**

The Project would not have significant traffic impacts, and no mitigation would be required.

## **3.13 Human Health and Safety**

### **3.12.1 Affected Environment**

Hazardous wastes—which can be liquids, solids, or gases—are stored and are transported in a variety of ways in Plumas County. The US EPA defines hazardous wastes as hazardous materials that are discarded, abandoned, or recycled. The EPA groups hazardous wastes in three categories: Listed Wastes, Characteristic Wastes, and Mixed Radiological and Hazardous Wastes. Examples of the most common types of hazardous materials that are routinely transported and used throughout the County are diesel, gasoline, oils, cleaning materials, and propane.

Transportation-related public health and safety issues have the potential to occur along the major thoroughfares of the County. The highest potential for transportation-related incidents exists along the County’s main east-west thoroughfare, SR 70, and along SRs 36 and 89. Most of the hazardous materials shipped through and within the County consist of petroleum products such as heating fuels, gasoline, diesel, and propane. The County’s railroad corridors, both Union Pacific Railroad and Burlington Northern Santa Fe Railway, are an additional public safety concern since freight trains also carry bulk containers of hazardous materials such as petroleum and fertilizers.

Plumas County Environmental Health Department (PCEH) manages the County’s hazardous materials management program. PCEH maintains the Hazardous Materials Business Plan and Inventory Program. The program enforces the State “right-to-know” laws passed in 1984 and requires local businesses to provide public access to information about the types and amounts of chemicals being used on their property. Businesses must plan and prepare for a chemical emergency through the preparation of a Hazardous Materials Inventory that is updated and certified annually. PCEH also regulates the use, storage, and treatment of hazardous materials and wastes, and above-ground and underground storage tanks.

Plumas County has a minimal number of sites considered to be hazardous materials sites pursuant to Government Code Section 65962.5. The Project site is not located on or near a hazardous materials site.

Wildland fires are a major hazard in Plumas County. Wind, steepness of terrain, and naturally volatile or hot-burning vegetation contribute to wildland fire hazard potential. The principal ingredients of wildland fires—fuel, topography, and weather—combine to make highly hazardous fire conditions throughout much of the County. Fire protection is categorized in three ways: Local Responsibility Areas (LRA), State Responsibility Areas (SRA), and Wildland Urban Interface Fire Areas (WUIFA). Applicable building standards serve to address potential health and safety impacts within the LRA. Wildland Urban Interface Building Standards (WUIBS) serve to address potential health and safety impacts within an SRA, Local Agency Very-High Fire Hazard Severity Zone, or WUIFA.

Upon approval of the proposed annexation by LAFCO, structural fire protection service would be provided by the Chester Fire Protection District as the Project parcels are located within District boundaries.

Located within Plumas County are three public-use airports: Rogers Field Airport in Chester, Gansner Airport in Quincy, and Nervino Airport in Beckwourth. The airports serve approximately 44,000 operations (takeoffs plus landings) annually. Potential safety issues associated with airports include aircraft accidents and noise impacts to surrounding land uses. Airport operation hazards include the development of incompatible land uses, power transmission lines, wildlife hazards, such as bird strikes, existing obstructions such as timbered hillsides, and tall structures in the vicinity of these airports. Airport safety zones are established to minimize the number of people subjected to noise and potential aircraft accidents through limitations on the type of development allowed around airports. Local Airport Land Use Compatibility Plan zoning regulations provide specific details for the established airport safety zones.

In addition to the airports, the Plumas District Hospital in Quincy, the Indian Valley Health Care District in Greenville, and the Eastern Plumas Hospital in Portola have heliports. The closest commercial airport is Reno/Tahoe International Airport in Reno, Nevada. Option 1 of the proposed Project entails construction and operation of a heliport associated with the new hospital facilities.

The Plumas County Office of Emergency Services (OES) is responsible for coordinating the County government's role in preparation and response to a disaster or large-scale emergency within Plumas County. The Office of Emergency Services works closely with other emergency management operations in the City of Portola and various special districts, authorities, and joint-power authorities within County boundaries. In the event of



an emergency, the Office of Emergency Services is charged with responding to the unincorporated areas of Plumas County, providing support to jurisdictions within Plumas County.

Emergency evacuation is an integral component of the County emergency management system. The Office of Emergency Services also conducts ongoing evaluation of potential evacuation routes, including capacity and condition of roadways and potential barriers to the use of roadways, such as flooding. There are no set evacuation routes; rather, they are established in real time for events based on circumstances existing at the time. The focus is on three operational concerns: 1) Local/community evacuation; 2) Area-wide evacuation; and 3) Large-scale traffic management during regional evacuations. Primary State and local arterial and secondary ground transportation routes have been identified and are included in general preparedness and response planning efforts.

### **3.12.2 Environmental Consequences**

Due to the nature of construction and operation of the facility, the routine transport, disposal, or use of hazardous materials is expected to increase above current levels roughly commensurate with the increased capacity of the SHD's healthcare facilities from 26 to 36 beds, representing a 38-percent increase in capacity and potential increase in generation of hazardous materials. Full capacity of both current facilities and proposed facilities is likely to be rare. The proposed facilities are not expected to cause a reasonably foreseeable increase in the likelihood of an upset or accident release of hazardous materials. Hazardous biomaterials would be disposed of onsite as is currently done. The proposed addition of ultrasound to imaging services would not generate additional hazardous materials. Given existing State and County requirements regulating the transport, storage, and disposal of hazardous materials, the additional hazardous waste produced by the Project would not cause a substantial increase in hazards to the environment or to human health and safety, and the impact would be *less than significant*.

The closest airport to the Project site is Rogers Field Airport in southwest Chester. The nearest airport feature is the north terminus of the north-south runway, located 1.1 miles southwest of the proposed Project facilities. This runway is approximately 6,300 feet in length, making it a "Long General Aviation Runway," according to the Plumas County Airport Land Use Compatibility Plan (ALUCP). As defined by the ALUCP, the Project site is located within the 6,000-foot buffer around the runway referred to as Safety Compatibility Zone 6: Traffic Pattern Zone. "*Risk Factors/Runway Proximity: Generally low likelihood of accident occurrence at most airports; risk concern primarily is with uses for which potential*

*consequences are severe. Zone includes all other portions of regular traffic patterns and pattern entry routes.” “Basic Compatibility Qualities: Allow residential uses; allow most nonresidential uses; prohibit outdoor stadiums and similar uses with very high intensities, **avoid** children’s schools, large day care centers, **hospitals**, and nursing homes.”*

“Avoid” is defined in the ALUCP as “Use generally should not be permitted unless no feasible alternative is available.” There is no other available and feasible location adjacent to the existing Seneca HCD facilities that would not also be in Zone 6. The existing facilities would be repurposed as non-acute healthcare facilities but would be integrated with the proposed hospital facilities both functionally and administratively. Further, the economic feasibility of the proposed Project was dependent upon the donation by Collins Pine of the adjacent land on which the Project will be located. Zone 6 has a generally low likelihood of accident occurrence, and the Project is located at the extreme periphery of Zone 6. SHD must find the Project a compatible use for approval. The Airport Land Use Compatibility Plan for Rogers Field states uses that are to be “avoided” such as hospitals in Zone 6, must be submitted to the Airport Land Use Commission for review and action.

Due to the nature and location of the Project, it would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. All public access areas are served by adequate County roadways that connect with the State highway system.

The Project would be subject to all applicable building and electrical standards, which will help protect the public’s health, safety, and welfare.

The Project site is located within the State Responsibility Area (SRA) for fires, in a region where there are a disproportionately high number of fires per unit of population. (Existing adjacent Seneca HCD facilities are in Chester’s Local Responsibility Area.) High fire risk is characteristic of California’s foothill and mountain regions, due to the more hazardous natural combination of dense vegetation, low precipitation, and steep topography which encourages rapid fire spread.

The Project site is designated as a Very High Fire Hazard Severity Zone (VHFHSV) on CAL FIRE’s Fire Hazard Severity Zone Maps. Risk can be reduced by establishing defensible space and constructing with non-flammable roofs and ignition-resistant materials. The Project would be required to comply with Wildland Urban Interface Building Standards (WUIBS), which require building construction with fire-resistant materials and clearing of flammable vegetation in a 100-foot buffer around buildings, among other provisions. By

reducing tree and shrub cover on the Project site and facilitating greater emergency access, the Project would afford neighboring residences and businesses an increased measure of defensible space.

While compliance with the WUIBS would reduce the potential fire hazard at the Project site, the Project would nonetheless increase the number of employees, patients, and visitors on the site and the proposed ten worker housing units would increase the number of permanent residents on the site, thereby increasing the number of people potentially exposed to wildfire. Since the site is located within a VHFHSV designated by Cal-Fire, this would be a ***potentially significant impact***. Implementation of Mitigation Measure HAZ-1 would reduce the impact to insignificance. Although this impact would also apply to Option 1, the fire exposure risk would be somewhat reduced because this option would providing approximately 5.5 additional acres of defensible space post-clearing.

### 3.12.3 Mitigation

**HAZ-1. Fire Prevention Plan.** To reduce the risk of fire onsite, prior to construction SHD shall prepare a Fire Prevention Plan that includes the following provisions:

- a) SHD shall use fire resistant vegetation in onsite landscaping.
- b) Maintenance of the site shall include establishment of defensible space of structures onsite and the inspection of fire suppression equipment such as sprinklers.
- c) SHD shall coordinate with the Chester Public Utilities District (CPUD) to determine the appropriate amount of water and fire suppression equipment to be kept onsite for fire prevention purposes during project construction and operation.
- d) SHD and/or its contractors shall have water tanks, water trucks, or portable water backpacks (where space or access for a water truck or water tank is limited) sited/available at the project site for fire protection.
- e) During construction of the project SHD and/or its contractors shall implement ongoing fire patrols during construction hours and for 1 hour after the end of daily construction and hotwork.
- f) All construction crews and inspectors shall be provided with radio and cellular telephone access that is operational along the entire length of the approved route to allow communications with other vehicles and construction crews. All fires shall be reported immediately upon detection.

- g) All internal combustion engines, stationary and mobile, shall be equipped with spark arresters in good working order.
- h) Light trucks and cars with factory-installed mufflers shall be used only on roads where the roadway is cleared of vegetation.
- i) Equipment parking areas and small stationary engine sites shall be cleared of all extraneous flammable material.
- j) SHD shall prohibit smoking in wildland areas, with smoking limited to paved areas or areas cleared of all vegetation.
- k) All construction vehicles shall carry fire suppression equipment.
- l) SHD shall ensure that all construction workers receive training on the proper use of fire-fighting equipment and procedures to be followed in the event of a fire.
- m) As construction may occur simultaneously at several locations, each construction site shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires.
- n) SHD shall instruct construction personnel to park vehicles within roads, road shoulders, graveled areas, and/or cleared areas (i.e., away from dry vegetation) wherever such surfaces are present at the construction site.
- o) SHD and its contractor shall cease work during Red Flag Warning events in areas where vegetation would be susceptible to accidental ignition by project activities such as welding or use of equipment that could create a spark.
- p) SHD shall coordinate the finalization of road improvements with CPUD and other emergency responders to ensure that sufficient ingress and egress exists onsite.

A copy of the Fire Prevention Plan shall be posted at all construction sites and all employees and contractors should be encouraged to sign a statement indicating that they have read and understand the Fire Prevention Plan.

## **4.0 Cumulative Effects**

The environmental analysis documented in this EA included a cumulative effects assessment that considered the effects of the proposed Project to combine with effects of other previous development projects, projects that are currently being developed, and reasonably foreseeable future projects, such as projects for which applications have been submitted to planning agencies.

The Project would be located in a small mountain community of approximately 2,000 residents. The community is surrounded by undeveloped mountains, with a large reservoir located just to the east. There have been few new development projects in recent years, and little development is currently anticipated. The most noteworthy planned development is currently proposed for 1125 Highway 36, which is located approximately 2 miles southwest of the Project site and slightly west of the Rogers Field Airport. The project would develop a 71.82-acre site with approximately 200,000 square feet of both open and fully enclosed storage space for recreational vehicles (RVs) and boats, as well as mini storage units; approximately 50,000 square feet of warehouse and shop space; a high-end RV park with pool, park, laundry service, and other amenities; and unspecified retail space for store fronts and restaurants. Approximately 80 percent of the trees and vegetation on the undeveloped property were destroyed by the 2021 Dixie Fire.

The only other recent, current, or anticipated development in the Chester area has occurred at Chester Park, located about a quarter-mile northeast of the Project site. A community garden was recently added to the facility, along with other new features and programs intended to draw more users and visitors to the park. The community garden was developed on an existing paved portion of the property and did not involve subsurface disturbance or operation of heavy construction equipment.

**Table 3** presents a qualitative assessment of the proposed Project's potential cumulative impacts in conjunction with other past, present, and reasonably foreseeable future development in the Project area.

**Table 3 Potential Cumulative Effects, by Environmental Resource**

Resource	Past Actions	Present Actions	Proposed Action	Future Actions	Cumulative Effect
Land Use	Limited new development	No expansion of development	Up to 15.8 acres of forestland converted to other use	Up to 71 acres of denuded forestland converted to commercial use	Less than significant
Floodplains	Unknown	No effect	No effect	Potential encroachment	No cumulative effect
Wetlands	Unknown	No effect	Less than significant	No anticipated impact	Less than significant
Water Resources	Some decline in surface water quality	Less than significant	No adverse effect	Potential for degradation from construction and operation	No effect
Coastal Resources	No effect	No effect	No effect	No effect	No effect
Biological Resources	Incremental loss of habitat, unknown effects on species	No effect	Minor loss of plantation forestland	Minor loss of forestland	Less than significant
Cultural Resources	Unknown	No effect	No impacts anticipated; discovered resources would be protected	Unknown, but assumed that discovered resources would be protected	Less than significant
Aesthetics	Progressive replacement of natural habitat with manmade development	No effect	Less than significant	Unknown, but assumed less than significant	Less than significant
Air Quality	Operational emissions ongoing but no	No effect	Less than significant	Less than significant	Less than significant

Resource	Past Actions	Present Actions	Proposed Action	Future Actions	Cumulative Effect
	significant decline in ambient air quality				
Socio-Economic	Unknown	No effect	Beneficial effect of new jobs and housing	Beneficial effect of new jobs	Beneficial effect of new jobs
Noise	Ongoing traffic noise from previous development	No effect	Less than significant	Less than significant	Less than significant
Transportation	Ongoing traffic from previous development	No effect	Less than significant	Less than significant	Less than significant
Health & Safety	Unknown	No effect	Less than significant	Unknown, but presumed less than significant	Less than significant

The proposed Project would be limited in scope and would have limited potential adverse environmental effects that would be reduced to insignificance through implementation of the identified mitigation measures. There is no current and very little anticipated future development in the Project area and the Project’s incremental contribution to environmental impacts associated with expected future development would not be cumulatively considerable. The Project would have less-than-significant cumulative impacts.

## 5.0 Summary of Mitigation

The following mitigation measures were identified in this EA:

### Wetlands

**Mitigation Measure WET-1a: Implementation of ESAs and Monitoring for Waters of the United States and Associated Riparian Zones.** Prior to Project implementation, with or without Option 1, any waters of the United States,

potential waters of the United States, and associated riparian zones shall be established as environmentally sensitive areas (ESAs) and marked off with fencing as directed by a qualified biologist. Monitoring by a qualified biologist shall occur for any required work near the ESAs. With implementation of these measures, adverse effects on wetlands and other waters of the U.S. would not be significant.

### **Special-Status Plants**

**Mitigation Measure BIO-1: Floristic Surveys.** Appropriately timed surveys for special-status plants shall be conducted in compliance with all CDFW (2018), USFWS (1996), and CNPS (2001) published survey guidelines prior to initiation of work activities. Project (including Option 1) commencement shall not be initiated until special-status plant pre-construction surveys are completed and subsequent mitigation, if necessary, is implemented. If no special-status plant species are found to inhabit the site, no further mitigation measures would be necessary.

If special-status plant species are detected, individuals shall be clearly marked and avoided. If special-status plants detected during focused surveys cannot be avoided, consultation with CDFW and/or USFWS (depending on listing status) shall occur. As part of this consultation, a mitigation plan shall be developed and approved by the appropriate agencies to avoid all adverse impacts. The mitigation plan shall include methodology of transplanting and/or on-site replanting at a 1:1 (mitigation to impacts) ratio, five-year monitoring program, success criteria (e.g., 70% survivorship threshold), and annual reporting requirements. In addition, this plan shall include worker education and development of appropriate avoidance and minimization measures.

### **Special-Status Wildlife**

**Mitigation Measure BIO-2a: Environmental Training.** Each year prior to the commencement of Project-related activities (including Option 1 activities), a qualified biologist will provide an environmental awareness training program to educate Project personnel on relevant special-status species and their habitats, sensitive/regulated habitats, and applicable environmental laws and permits. The training shall include a description of the species and their habitats, importance of preserving species and habitats, penalties for unauthorized take, and the Project limits.



**Mitigation Measure BIO-2b: Migratory Birds and Raptors (osprey and bald eagle)/Nest Avoidance.** Tree and vegetation clearing (removal, pruning, trimming, and mowing) shall be scheduled to occur outside of the migratory bird nesting season (February 1 through August 31). However, if clearing and/or construction activities will occur during the migratory bird nesting season, then pre-construction surveys to identify active migratory bird and/or raptor nests shall be conducted by a qualified biologist within 14 days of construction initiation on the Project site and within 300 feet (i.e., zone of influence) of Project-related activities. The zone of influence includes areas outside of the Project and Option 1 sites where birds could be disturbed by construction-related noise or earth-moving vibrations.

If active nest, roost, or burrow sites are identified within the Project or Option 1 sites, a no-disturbance buffer shall be established for all active nest sites prior to commencement of any proposed Project-related activities to avoid construction or access-related disturbances to migratory bird nesting activities. A no-disturbance buffer constitutes a zone in which proposed Project-related activities (e.g., vegetation removal, earth moving, and construction) cannot occur. A minimum buffer size of 50 feet for passerines and 300 feet for raptors shall be implemented; sizes of the buffers shall be determined by a qualified biologist based on the species, activities proposed near the nest, and topographic and other visual barriers. Buffers shall remain in place until the young have departed the area or fledged and/or the nest is inactive, as determined by the qualified biologist. If work is required within a buffer zone of an active bird nest, work may occur under the supervision of a qualified avian biologist. The qualified avian biologist monitoring the construction work shall have the authority to stop work and adjust buffers if any disturbance to nesting activity is observed.

**Mitigation Measure BIO-2c: Bald Eagle and Golden Eagle.** In accordance with the Bald and Golden Eagle Protection Act (BGEPA) (USFWS, last amended 1978), pre-construction surveys for eagles shall be conducted on the Project site and Option 1 site (if applicable) and within 0.5 miles of Project/Option 1 site boundaries. If an active eagle nest is detected within this survey area, the Project proponent shall implement a 0.5-mile no-disturbance buffer around the nest until a qualified biologist determines the nest is no longer active.

### Invasive Species

**Mitigation Measure BIO-3: Invasive Species.** Vehicles and construction equipment should be inspected prior to entering the project site, and any soil and plant material shall be washed off equipment or vehicle tires and treads prior to entering the site and before leaving site. Any seed and mulch landscaping used during the course of construction shall comply with state regulations.

### Fire Hazard

**HAZ-1. Fire Prevention Plan.** To reduce the risk of fire onsite, prior to construction SHD shall prepare a Fire Prevention Plan that includes the following provisions:

- a) SHD shall use fire resistant vegetation in onsite landscaping.
- b) Maintenance of the site shall include establishment of defensible space of structures onsite and the inspection of fire suppression equipment such as sprinklers.
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- g) All internal combustion engines, stationary and mobile, shall be equipped with spark arresters in good working order.
- h) Light trucks and cars with factory-installed mufflers shall be used only on roads where the roadway is cleared of vegetation.
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- p) SHD shall coordinate the finalization of road improvements with CPUD and other emergency responders to ensure that sufficient ingress and egress exists onsite.

A copy of the Fire Prevention Plan shall be posted at all construction sites and all employees and contractors should be encouraged to sign a statement indicating that they have read and understand the Fire Prevention Plan.

## **6.0 Coordination, Consultation and Correspondence**

The following organizations, agencies, or agency websites were consulted in preparation of this EA (relevant exhibits that were part of this consultation are indicated in parentheses for each agency):

- California Department of Fish & Wildlife (CDFW) – (Exhibits F-K and T3)
- California Department of Conservation (DOC) – (Exhibits C4 and C5)
- California Department of Water Resources (DWR) – (Exhibit E2)
- California Native Plant Society (CNPS) – (Exhibits F-K and T3)
- State Historic Preservation Officer (SHPO), California Office of Historic Preservation – (Exhibit T4)

- Central Valley Regional Water Quality Control Board (Region 5) (RWQCB) (website and May 22, 2023 phone call with Lynn Coster, Senior of the Water Quality Certification and Stormwater Unit)
- Federal Emergency Management Agency (FEMA) – (Exhibits C6 and C7)
- United States Environmental Protection Agency (US EPA) – (Exhibit P)
- U.S. Fish & Wildlife Service (USFWS) – (Exhibits F-K and T3)
- Mooretown Rancheria of Maidu Indians – (Exhibit N1)
- Greenville Rancheria of Maidu Indians – (Exhibit N1)
- Estom Yumeka Maidu Tribe of the Enterprise Rancheria – (Exhibit N1)
- Washoe Tribe of Nevada and California – (Exhibit N1)
- United Auburn Indian Community of the Auburn Rancheria – (Exhibit N1)
- Susanville Indian Rancheria – (Exhibit N1)
- Tsi Akim Maidu – (Exhibit N1)

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## 8.0 List of Preparers

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