



**NOTICE OF INTENT TO ADOPT
AN INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

Date: October 24, 2025
To: Public Agencies, Organizations, and Interested Parties
From: Butte County General Services
Subject: Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration

This is to advise that pursuant to Title 14 of the California Code of Regulations (CCR), §§ 15070 and 15071, Butte County, acting as Lead Agency, has prepared this Initial Study/Negative Declaration (IS/MND) for the project described below.

Project Name: Gridley Behavioral Health Services Facility Project

Lead Agency Name and Address:

Shawn Rohrbacker, Project Manager
Butte County General Services
County of Butte
2081 Second Street
Oroville, CA 95965

Project Location: The project is located at 185 Sycamore Street, in the City of Gridley (City), California. The project area totals approximately 2.62 acres on 4 parcels (APNs 010-170-001, 010-170-019, 010-170-003, and 010-170-020).

Project Description: The project proposes to combine 4 existing parcels into 2 and construct a one-story, 10,100 square foot Behavioral Health Center (BHC) in an open space turf area. The BHC would provide a range of behavioral health services to low-to-moderate income individuals and families in the area, providing facility space for individual counseling offices, and large meeting rooms for group therapy and staff training. The project would also renovate the existing parking areas on the west and south sides of the existing buildings, upgrade landscaping, and construct a solid 6-foot wall along the property lines where parking abuts residential uses.

Based upon the conclusions set forth in the Initial Study, Butte County proposes to adopt a Mitigated Negative Declaration. The project site is located adjacent to a National Register Eligible resource and therefore does not qualify for a categorical exemption from CEQA.

Public Review Period: A 30-day public review period for the IS/MND will commence on October 24, 2025, for interested parties and public agencies to submit written comments on the document. Written comments must be mailed, submitted in person, or via email to the contact person below no later than November 24, 2025.

No public hearing will be held for the proposed project.



CEQA Project Status: An Initial Study-Mitigated Negative Declaration (IS/MND) has been prepared for this project pursuant to the provisions of CEQA. The IS/MND determined that the proposed project would have no significant impact and therefore a Mitigated Negative Declaration is proposed. The Draft IS/MND and all related analyses are available on the County's website at: <https://buttevotes.net/259/Public-Notices-CEQA-Filings>.

A physical copy of the Draft IS/MND will also be available for in person review at the address shown below.

Contact Person: Shawn Rohrbacker, Project Manager

Address: Butte County General Services, 2081 Second Street, Oroville, CA 95965

E-mail: srohrbacker@buttecounty.net



Public Review Draft Initial Study/Mitigated Negative Declaration

Gridley Behavioral Health Services Facility Butte County

October 2025



Gridley Behavioral Health Services Facility

Butte County

Public Review Draft Initial Study/Mitigated Negative Declaration

Prepared for:

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MITIGATED NEGATIVE DECLARATION

Butte County (County) does hereby prepare, declare, and publish this Mitigated Negative Declaration for the following described project:

Project Name: Gridley Behavioral Health Services Facility Project

Project Location: The project is located at 185 Sycamore Street, in the City of Gridley (City), California. The project area totals approximately 2.62 acres on 4 parcels (APNs 010-170-001, 010-170-019, 010-170-003, and 010-170-020).

Project Description: The project proposes to combine 4 existing parcels into 2 and construct a one-story, 10,100 square foot Behavioral Health Center (BHC) in an open space turf area. The BHC would provide a range of behavioral health services to low-to-moderate income individuals and families in the area, providing facility space for individual counseling offices, and large meeting rooms for group therapy and staff training. The project would also renovate the existing parking areas on the west and south sides of the existing buildings, upgrade landscaping, and construct a solid 6-foot wall along the property lines where parking abuts residential uses.

Findings: The County has reviewed the project and, on the basis of the whole record before it, has determined that there is no substantial evidence that the project, with mitigation measures as identified in the attached Initial Study, will have a significant effect on the environment. This Mitigated Negative Declaration reflects the County's independent judgment and analysis as Lead Agency. An Environmental Impact Report is not required pursuant to the Environmental Quality Act of 1970 (Sections 21000, et seq., Public Resources Code of the State of California).

Mitigation measures necessary to avoid the potentially significant effects on the environment are included in the attached Initial Study, which is hereby incorporated and fully made part of this Mitigated Negative Declaration. Butte County has hereby agreed to implement each of the identified mitigation measures which would be adopted as part of the Mitigation Monitoring and Reporting Plan.

This Mitigated Negative Declaration has been prepared pursuant to Title 14, Section 15070 of the California Code of Regulations, the Local Environmental Regulations adopted by the Butte County, and the Butte County Municipal Code.

Copies are also available for review at the Butte County General Services Department, 2081 2nd Street, Oroville, CA 95965.

Shawn Rohrbacker
Project Manager
Butte County General Services
(530) 552-3544

*If you need this document presented in an alternative format,
please contact:*

Shawn Rohrbacker, Project Manager, srohrbacker@buttecounty.net

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Cultural Resources Technical Memorandum

Executive Summary

Butte County proposes to construct the Gridley Behavioral Health Facility Project (project) in Gridley, California. The project proposes to combine 4 County parcels that are currently developed with the Veterans Memorial Hall and the Butte County offices at 165 Sycamore Street into 2 parcels and construct an up to 10,100 square foot 1-story Behavioral Health Center (BHC) in the open space turf area. The project would also renovate the existing parking lots on the west and south sides of the properties. The existing asphalt is badly eroded and there are large potholes throughout the parking lot. The project would further remove the existing shipping container and 2 sheds in the southwest corner of the parking area to make additional spaces. The project would construct 39 parking spaces, including 7 EV-capable spaces, 2 EV spaces equipped with charging stations, 1 accessible parking space, 1 accessible van parking space, and 11 compact spaces. Additionally, there would be 1 EV-capable van-accessible space, 1 motorcycle space, and 9 additional parking stalls that would be parallel parking along outside edge of Veterans Memorial Hall entry drive (these would not be included in the total parking count).

Landscaping is proposed to be drought resistant while complementing the overall project design and tying into the existing landscape. A solid 6-foot wood fencing would be constructed along the property lines where the parking area abuts the residential zone on the south side of the site.

The BHC would provide low to moderate income communities with access to adult outpatient services, homeless intensive case management, wellness and recovery, crisis response, and youth outreach services. It would include space for individual counseling offices and large meeting rooms for group therapy and staff training. The facility would be open from 8:00 a.m. to 5:00 p.m. and is anticipated to help 60 – 65 people per day. Most services would be via 30- to 60-minute appointments. The number of people in the building would differ in the morning and the afternoon. The facility would be expected to employ up to 29 workers.

Potential Impacts

Based on the environmental evaluation performed for this Initial Study, the proposed project would have:

- **No Impact** on Agricultural and Forestry Resources, Mineral Resources, Population and Housing, and Recreation.
- **Less Than Significant Impact** on Aesthetics, Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Transportation, Utilities and Service Systems, and Wildfire.
- **Less Than Significant Impact with Mitigation Incorporated** on Biological Resources, Hazards and Hazardous Materials, and Tribal Cultural Resources.

Mitigation Measures

The County has agreed to implement the following mitigation measures to reduce project impacts to a “Less Than Significant” level:

- **Mitigation Measure BIO-1:** Would reduce impacts on migratory birds to less than significant by requiring that a qualified biologist survey nesting birds within the project area no more than 3 days prior to the beginning of tree and vegetation removal or ground disturbing activities. If nesting birds are detected, consultation with California Department of Fish and Wildlife and United States Fish and Wildlife Service would be recommended to establish acceptable avoidance or minimization measures, which could include the establishment of a suitable activity-free buffer around active nests/roosting sites.
- **Mitigation Measure HAZ-1:** To reduce the potential for construction worker exposure to elevated levels of lead in site soils, requires the contractor to develop and implement a Health and Safety Plan for construction workers. Prior to any ground disturbing activities, the contractor would be required to document that workers are trained on the protocols and provide a copy of the final Health and Safety Plan on the job site.
- **Mitigation Measure HAZ-2:** To reduce the potential for inappropriate disposal of hazardous soils, requires excess soil to be stockpiled and profiled for disposal according to the requirements of the selected landfill.
- **Mitigation Measure TCR-1:** Addresses the potential to disturb tribal cultural resources (TCRs) during construction by providing for the evaluation and treatment of inadvertent/unanticipated discoveries of potential TCRs, archaeological resources, or cultural resources during a project's ground disturbing activities. Requires the contractor to implement any measures deemed by the California Environmental Quality Act (CEQA) lead agency, in consultation with the Mooretown Rancheria of Maidu Indians, to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate treatment of the find, as necessary.
- **Mitigation Measure TCR-2:** Addresses post review discoveries of cultural resources that may be of religious and cultural significance to the Mooretown Rancheria of Maidu Indians. Requires the contractor to implement any measures deemed by the lead agency to be necessary and feasible to preserve in place, avoid, or minimize significant effects to the resources, including the use of a paid Native American Monitor whenever work is occurring within 100 feet of the find. If adverse impacts to cultural resources or unique archaeological resources occur, then consultation with the Mooretown Rancheria of Maidu Indians regarding adverse effects shall occur, pursuant to 36 Code of Federal Regulations § 800.5, Assessing Adverse Effects, and § 800.6, Resolution of Adverse Effects.

List of Abbreviations

Abbreviation	Definition
AB	Assembly Bill
AQMD	Air Quality Management District
BCAQMD	Butte County Air Quality Management District
BMP	best management practice
CAL FIRE	California Department of Forestry and Fire Protection
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of Gridley
CO ₂ e	carbon dioxide equivalent
County	Butte County
CRHR	California Register of Historical Resources
dbh	diameter at breast height
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
HCD	California Department of Housing and Community Development
IS	Initial Study
lbs	pounds
MBTA	Migratory Bird Treaty Act
MMRP	Mitigation Monitoring and Reporting Plan
MND	Mitigated Negative Declaration

NAAQS	National Ambient Air Quality Standards
NHPA	National Historic Preservation Act
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
OPR	Office of Planning and Research
OSFM	Office of the State Fire Marshal
PM	particulate matter
PRC	Public Resources Code
project	Gridley Behavioral Health Facility Project
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SSS	Special Status Species
SWPPP	Storm Water Pollution Prevention Plan
USFWS	United States Fish and Wildlife Service
VHFHSZ	Very High Fire Hazard Severity Zones
VMT	vehicle miles traveled
WWTP	Wastewater Treatment Plant

1 Project Information

1. Project title:	Gridley Behavioral Health Services Facility
2. Lead agency name and address:	Butte County 25 County Center Drive Oroville, CA 95965
3. Contact person and phone number:	Shawn Rohrbaker, Project Manager (530) 552-3544
4. Project location:	185 Sycamore Street, Gridley, California 95948
5. Project sponsor's name and address:	Butte County 25 County Center Drive Oroville, CA 95965
6. General Plan designations:	Public
7. Zoning:	P-Q-P Public Quasi Public
8. Description of project:	The proposed project would merge 4 existing parcels into 2 parcels and construct a 10,100 square foot 1-story Behavioral Health Center.
9. Surrounding land uses and setting:	The site is bordered by Haskell Street to the west and Sycamore Street to the north. Residential single-family homes are adjacent to the site to the north, south, and west, while a commercial facility lies adjacent to the east.
10. Other public agencies whose approval is required:	City of Gridley
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?	The County initiated consultation with tribes identified by the Native American Heritage Commission on August 21, 2024, with a letter and attached maps. The Mooretown Rancheria of Maidu Indians indicated there is a strong possibility of cultural material within the Area of Potential Effect and requested to begin formal consultation. Follow-up phone calls were made on September 11, 2024. The County reached out to Mooretown Rancheria of Maidu Indians again on December 18, 2024, for consultation and has received no response to date.

2 Introduction

2.1 Focus of the Environmental Review

2.1.1 California Environmental Quality Act

Butte County (County), as the project sponsor and lead agency, has prepared this Draft Initial Study (IS) pursuant to CEQA for the proposed Gridley Behavioral Health Facility Project (project). This IS is an informational document provided to help the public and decision-makers understand the effects the project may have on the environment, and how any potential adverse effects may be mitigated. Because this document describes potentially significant impacts that can be reduced to less than significant with the adoption of mitigation measures, a Mitigated Negative Declaration (MND) has been prepared.

The Notice of Intent to Adopt a Mitigated Negative Declaration provides notice to interested agencies and the public that it is the County's intent to adopt an MND and, pending public review, the County expects to determine from this IS that the proposed project would not have a significant effect on the environment as mitigated. This Public Review Draft IS/MND is subject to modification based on comments received by interested agencies and the public.

2.2 Summary of Findings

Biological Resources, Hazards and Hazardous Materials, and Tribal Cultural Resources would be potentially affected by this project, including at least 1 impact that would be a "Potentially Significant Impact" without the implementation of mitigation measures. Based on the environmental evaluation performed for this IS (Section 4), the proposed project would have:

- **No Impact** on Agricultural and Forestry Resources, Mineral Resources, Population and Housing, and Recreation.
- **Less Than Significant Impact** on Aesthetics, Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Transportation, Utilities and Service Systems, and Wildfire.
- **Less Than Significant Impact with Mitigation Incorporated** on Biological Resources, Hazards and Hazardous Materials, and Tribal Cultural Resources. The project would implement mitigation measures as described herein to reduce potential impacts to a Less Than Significant level.

2.3 Required Permits and Additional Approvals

2.3.1 Approvals

- Building Permit
- Parcel Merger to merge 4 parcels into 2 parcels
- Parking Variance

2.3.2 Responsible Agencies

Butte County

2.4 Lead Agency Determination

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT (EIR) is required.

☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An EIR is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

10/23/2025

Date

Shawn Rohrbacker

Name

Capital Improvement Project Manager

Title

3 Project Description

The County proposes to construct the Gridley Behavioral Health Facility in Gridley, California. The project proposes merging 4 County parcels into 2 parcels, constructing a 1-story Behavioral Health Center (BHC) in the open space turf area, and installing overall site improvements such as enhanced parking and landscaping. The BHC would include space for individual counseling offices and large meeting rooms for group therapy and staff training.

3.1 Project Location

The project is located at 185 Sycamore Street, in the City of Gridley (City), California (**Figure 1**). The project area totals approximately 2.62 acres on 4 parcels (APNs 010-170-001, 010-170-019, 010-170-003, and 010-170-020) (**Figure 2**).

3.2 Background

In 2018, the Camp Fire forced 36,000 people from their homes and destroyed 90% of the housing stock on the ridge leading to a massive redistribution of Butte County residents. The Gridley area became a safe haven for Camp Fire survivors, and the City was severely impacted as fire survivors sought refuge in the community, exploding the population and creating an immediate and ongoing staggering unmet need for housing and mental health support.

Countywide there has been a significant increase in the numbers of mild to moderate mental health diagnoses since the Camp Fire. In the quarter after the fire there was an 82.5% increase in the number of mental health care consumers compared to the quarter before the fire. Compared to Spring 2021, the increase was 264.6%. These increases represent the mild cases that could worsen over time and become more severe cases, as anticipated by the Butte County Department of Behavioral Health (BCDBH). There is, and will continue to be, an increase in Post-Traumatic Stress Disorder, anxiety, depression, and drug and alcohol use associated with primary and secondary trauma people have experienced (Rosenthal 2021). The response to the coronavirus pandemic further exacerbated stressors associated with health risks, income and employment threat, childcare needs, isolation, and reduced access to formal and informal supports.

Homelessness has increased countywide as well. The Homeless Point In Time Count (Butte Countywide Homeless Continuum of Care 2019) showed an increase of 16% 6 months after the fire. The count was completed at a time when people who were displaced and without permanent housing did not consider themselves “homeless.” Further, the count is conducted with people accessible on the street or in shelters and does not represent people temporarily housed. Therefore, it is believed that the unhoused community was severely underestimated. In 2025, there were 482 people identified as homeless, 41% of whom were experiencing homelessness for the first time. This reflects an increase from 2023, when 30% of respondents reported first time homelessness based on information in the Butte County Homeless Coordinated Entry System, a database of homeless households seeking support in finding housing (Butte Countywide Homeless Continuum of Care 2025), and 40% of respondents reported an increase in chronic homelessness, which is defined as 1 or more year of homelessness.

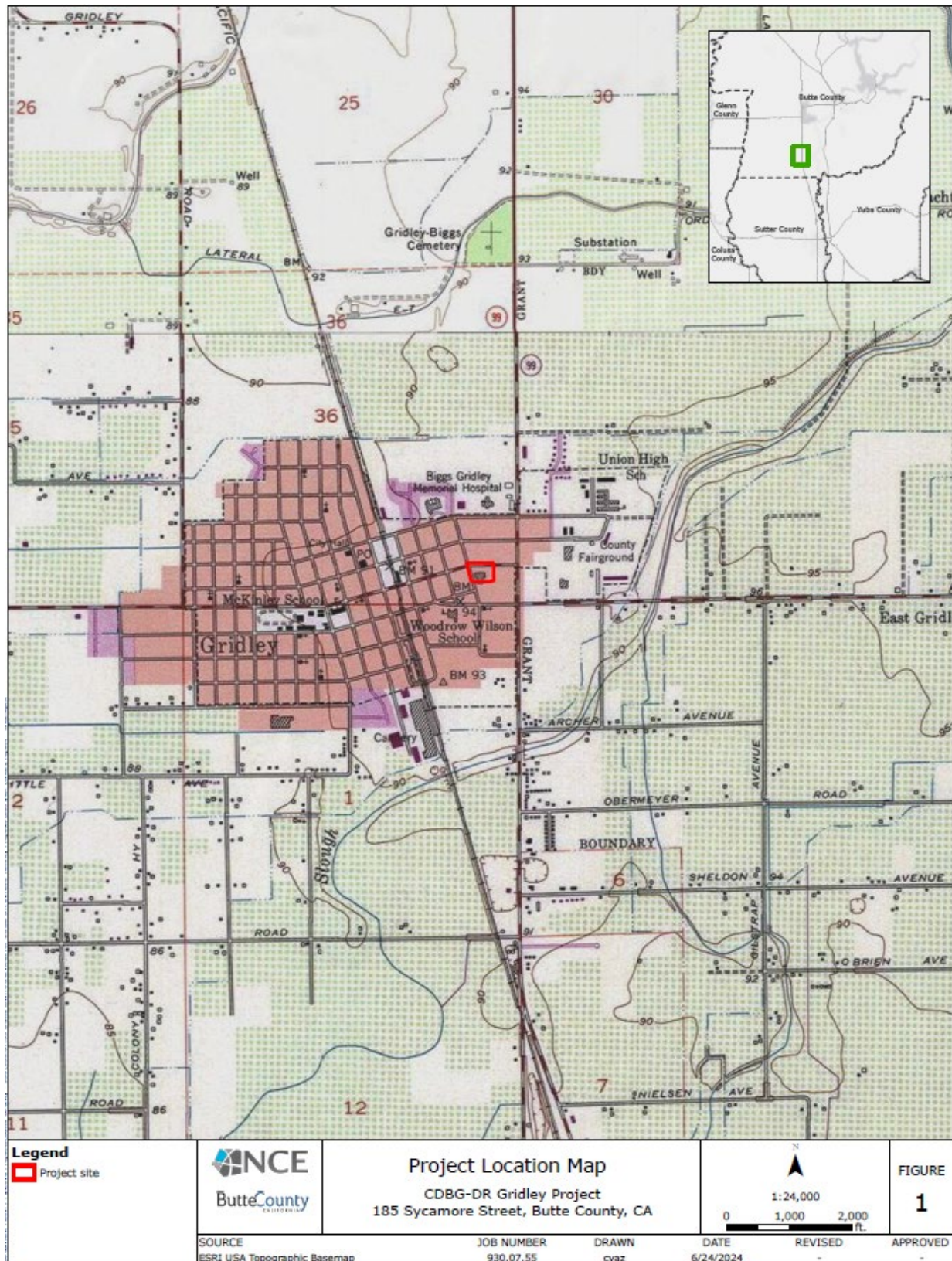


Figure 1. Project Vicinity Map



Figure 2. Parcel Map

Coupling the long-term trauma of fire survivors with COVID stressors, there is a mounting need for services in the Gridley/Biggs area. To help residents build resilience amid these extraordinary challenges, there must be a strategic investment in service access infrastructure to meet the evolving needs. The current Gridley BCDBH facility is just over 4,000 square feet and is inadequate for housing services that will meet the new needs of this community. The BCDBH proposed this BHC to provide a comprehensive, integrated, trauma-informed mental health service at a central Gridley location, including adult outpatient services, homeless intensive case management, wellness and recovery support, crisis response services, and youth outreach services.

3.3 Project Objectives

While the Camp Fire impacted all residents, those with the fewest resources continue to struggle with the challenges of housing and lifeline stability, which impacts resilience and recovery. The project will benefit disaster recovery, mitigation, and resilience by stabilizing individuals in their current life circumstances. The project objectives are to:

- Provide services exclusively to low-income residents within the most impacted and distressed areas.
- Make services accessible to residents where they live to reduce transportation costs.
- Provide housing stability and economic self-sufficiency services to support residents with few countywide housing options available.
- Benefit disaster recovery, mitigation, and resilience by stabilizing individuals in their current life circumstances.

3.4 Existing Conditions

The project area consists of 4 adjoining parcels owned by the County. The project area contains the Gridley Veteran's Memorial Hall (a CRHR eligible property), the Butte County Agricultural Commission offices, areas of landscaped open space, a paved area available for parking, 2 sheds, a shipping container, and a variety of monuments. The existing parking area is shared by the 2 existing facilities. One of the parcel boundary lines runs through the middle of the County Offices. The parcels on the northeast side of the project area serve as open space turf areas with an existing curb gutter and a sidewalk along the street frontage.

Land surrounding the project area is primarily commercial and residential. The project area is bounded by Sycamore Street to the north, Haskell Street to the west, and residences, a gas station, a market, and a warehouse to the east. Single-family residences can be found to the south and west. The project area lies adjacent to 1 potential historic district, the historic core of Gridley, and lies within a second potential historic district, a small early 20th century addition to the historic core of Gridley.

3.5 Project Features

The project site currently consists of 4 legal parcels. The proposed project would merge these 4 parcels into 2 parcels, as shown in Figure 3. The resulting 2 parcels would separate the Veterans Memorial Hall from the remaining existing buildings on the site. The Veterans Memorial Hall, situated on the western

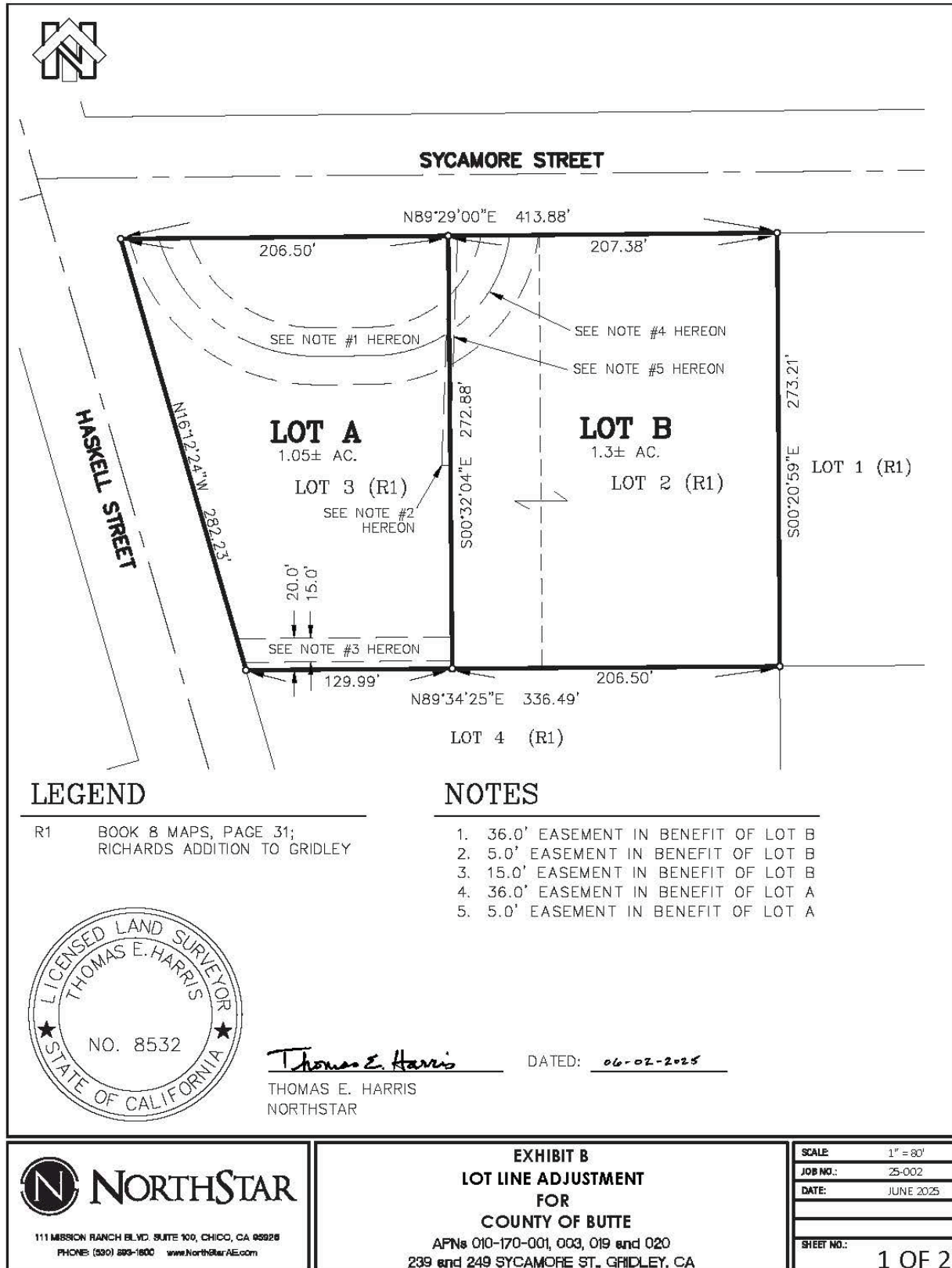


Figure 3. Parcel Merger

frontage, would remain the largest and tallest structure on the parcel. The County Parking Lot would remain south of the County Offices building, providing the primary shared parking facilities.

The BHC office would be approximately 10,100 square feet (sf) constructed on the northeast portion of the project area directly east of the existing County Offices building and southeast of the existing Veterans Memorial Hall (Figure 4). The proposed BHC would be 1 to 2 stories in height, lower than the Veterans Memorial Hall and generally comparable to the County Offices building, with landscape setbacks and circulation routes such as walkways that will connect existing buildings and provide continuity with the existing buildings on the project area. The maximum building height is approximately 22 feet to the top of the roof and 16 feet to the parapet.

Modern exterior elevations featuring composite metal wall panels, standing-seam metal roofing, plaster finishes, and aluminum-framed windows and doors (Figure 5 and Figure 6). Design elements include metal canopies, sunshades, and rooftop screening to shield mechanical equipment. The north and south elevations show low-profile design with windows and roof variations intended to create a more approachable, pedestrian-scale appearance. The west elevation highlights the main public entry with a prominent roofline and large windows, designed to give the building a clear and welcoming entrance while fitting in with nearby existing buildings. The east elevation serves as a secondary access point and uses similar design features to maintain a consistent appearance with the rest of the structure.

The BHC would include facility space for individual counseling offices and large meeting rooms for group therapy and staff training. The BHC would provide low to moderate income communities access to the following services:

- **Adult Outpatient Services:** Would provide assessment, diagnosis, and treatment for individuals requiring mental health or dual diagnosis treatment. These services may include medication support, individual counseling, group counseling, and connection to vocational training and support housing.
- **Homeless Intensive Case Management:** Would provide the highest level of outpatient services to individuals who because of their mental illness require support to avoid homelessness or to manage their current homelessness. Services would include frequent psychiatric appointments, medication support and delivery, and in-field services.
- **Wellness and Recovery Support:** A consumer-driven day center for adults with a mental health condition. Recovery-oriented activities would include peer support, socialization opportunities, life skills groups, reintegration into the community, and employment services. A medication distribution clinic would serve those needing support with storage and treatment.
- **Crisis Response:** Would provide assessment, safety planning, de-escalation intervention and support, and psychiatric hospitalization coordination. In fiscal year 2019/2020, following the Camp Fire, crisis walk-in services were provided for almost 2,000 people and nearly 1,000 people were admitted to a crisis stabilization unit. There were 1,324 people issued a 5150 (Welfare and Institutions Code allowing a person with a mental illness to be involuntarily detained for a 72-hour psychiatric hospitalization).



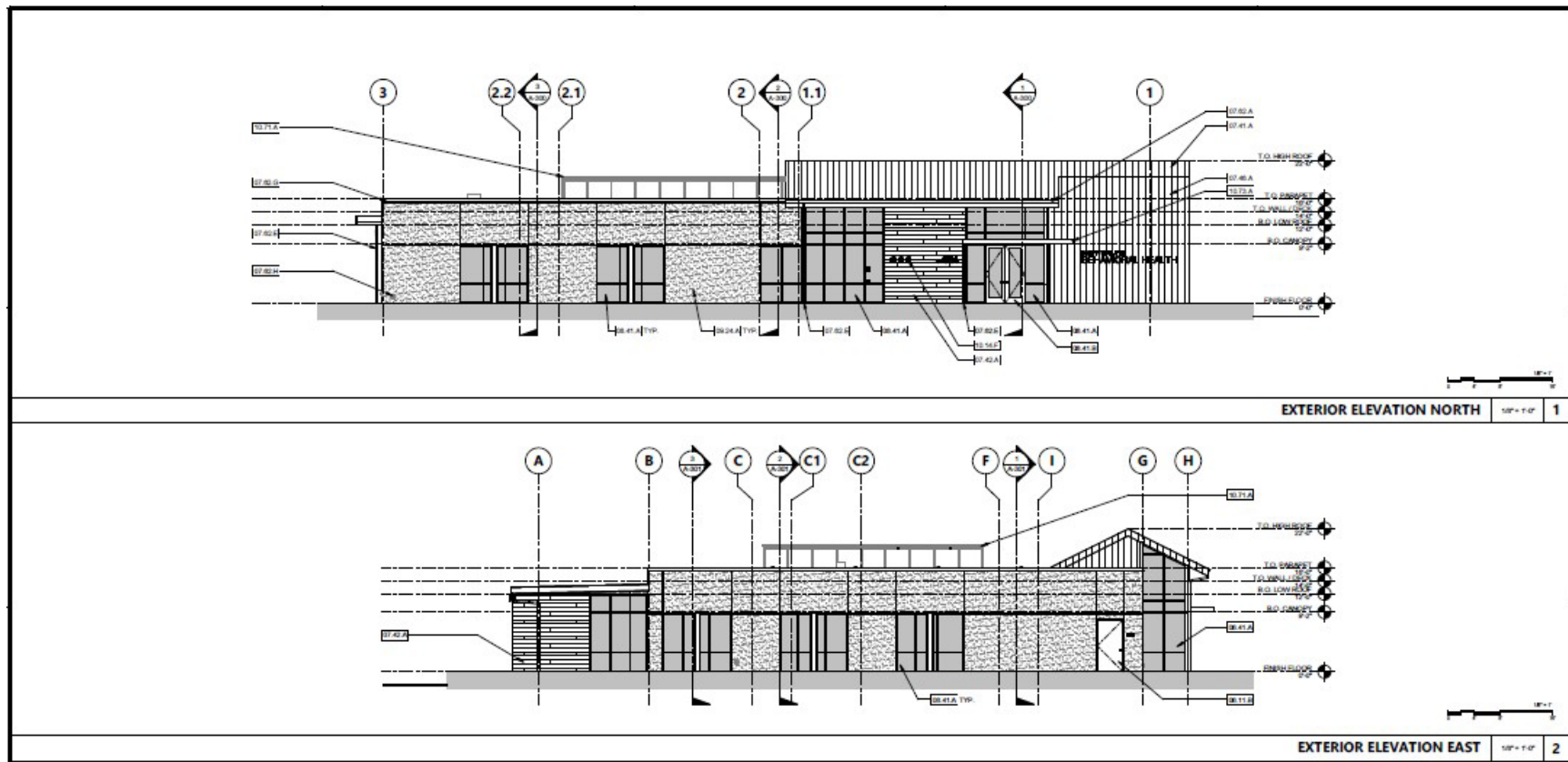


Figure 5. Building Exterior Elevation North and East

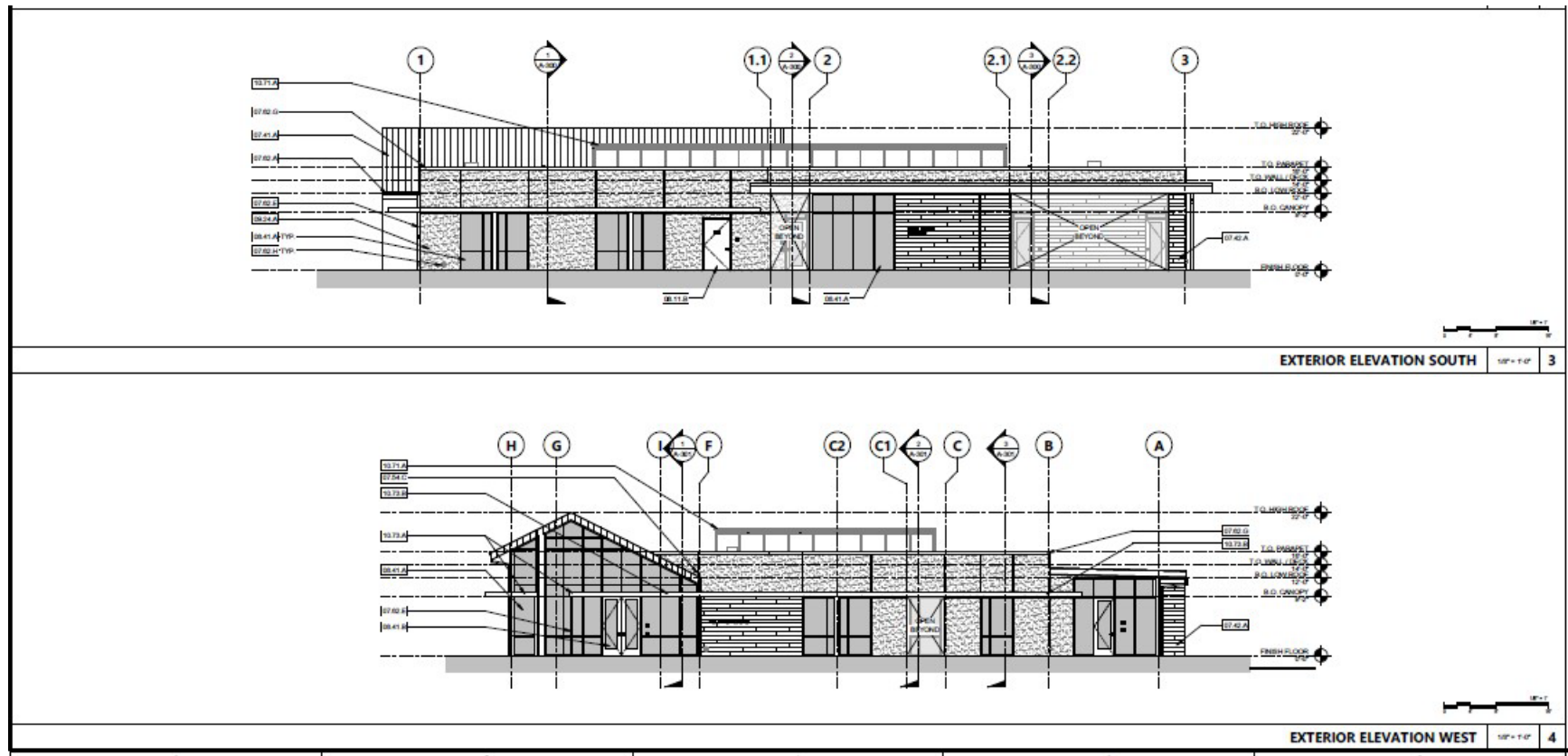


Figure 6. Building Exterior Elevations South and West

- **Youth Outreach Services:** Would provide outpatient treatment for children, transitional age youth, and families experiencing behavioral and emotional challenges. Services would include individual, group, and family therapy, case management, and medication support. The Youth Intensive Program offers culturally specific, intensive care to youth at risk of psychiatric hospitalization or out-of-home placement with services such as therapy, skill building, and regular family check-ins. The Youth Empowerment Services program, available by referral, focuses on social rehabilitation through group activities, leadership development, and outdoor experiences.

The facility would be open from 8:00 a.m. to 5:00 p.m. and is anticipated to help 60 – 65 people per day on a busy day and 45-50 people on average. There will be 4-5 people in the building at any given time. Most services would be offered via 30- to 60-minute appointments, apart from wellness and recovery programs which may see clients for several hours depending on activities planned. The number of people in the building would differ in the morning and afternoon. The facility would be expected to employ up to 29 workers.

The project would renovate the existing parking areas on the west and south sides of the existing buildings. The existing asphalt is badly eroded and there are large potholes throughout the parking lot. The project would also demolish the existing shipping container and shed in the parking lot to make additional spaces. The project would construct 39 auto parking spaces, including 7 EV-capable spaces, 2 EV spaces equipped with charging stations, 1 accessible parking space, 1 accessible van parking space, and 11 compact spaces. Additionally, there would be 1 EV-capable van-accessible space and 1 motorcycle space, which are not included in the total auto parking count.

Landscaping throughout the project area would be upgraded and designed to be drought resistant while complementing the overall project design. It would tie into the existing landscape and be designed to provide pleasant views from the building to the exterior. In addition, a solid 6-foot fence would be constructed along the property lines where the parking area is near the residential zone on the south side of the project area.

3.5.1 Construction Schedule

Construction is slated to begin in the first quarter of 2026 and last approximately 9 months. All construction staging would take place within the project area boundaries. Construction grading and utility trenching is anticipated to have a depth of excavation of approximately 1 – 2 feet.

Grubbing/Rough Grading

Landscaping that would interfere with construction would be removed from the project area. There are several large existing trees on the site that would be retained through construction. Rough grading would shape the construction site.

Excavation and Site Work

Following rough grading, additional excavation would bring the project area to final grade and prepare the soil for underground piping and structural slabs. Site work would involve installing underground utility pipes (some pipes may be 6-inch-diameter or larger), manholes, structural foundations, curbs,

gutters, and sidewalks. Excavation for concrete foundations and underground drainage pipes would be performed with excavators and/or backhoes.

Building Construction

This phase would consist of compacting and preparing the soil for all structural facilities and developing max footing depth of 18-inch piers for foundation systems. Prior to pouring concrete, structural forms, rebar, and conduits would be installed for the building. After the concrete is poured, it would be finished and cured before the forms are removed.

Paving, Striping, Landscaping

All parking areas, and designated locations would be paved and striped. Paving would be performed incrementally throughout the project area as large construction and non-rubber tread equipment is removed. Landscaping would include the installation and/or construction of plantings and outdoor lighting.

In review of similar recent projects in the region, the process and staging for construction is as follows:

- 03/2026 — Layout of site utilities and building pad
- 04/2026 — Forming building pads and footings
- 05/2026 — Pouring building pads and footings
- 06/2026 — Site prep for utilities and framing of the building
- 07/2026 — Roofing and solar
- 07/2026 — Finish rough interior
- 08/2026 — Stucco exterior of building
- 08/2026 — Paving and sidewalks
- 09/2026 — Landscaping and irrigation
- 10/2026 — Building finishes
- 11/2026 — Certificate of Occupancy

3.5.2 Equipment and Labor Force

Construction equipment would include excavators, backhoes, bulldozers, cement trucks, cranes, graders, and a wheeled roller. Water trucks with a tank size of 2,000 to 4,000 gallons would be used for dust control during construction.

A skilled labor force would be required to complete this project, including civil/earthwork personnel, excavators, masons, painters, plumbers, landscapers, carpenters, cement finishers, operating engineers, electricians, and craftsmen. The number of workers at the construction site would vary based on the phase and complexity of construction.

Work would generally be completed during daylight hours, typically 8:00 a.m. to 6:00 p.m., or as specified by the City's Municipal Codes. During the construction period, construction would generally be

performed 5 days per week (weekend work may occur occasionally depending on schedule), year-round, except for standard U.S. holidays. There would be no on-site temporary workforce housing, and parking of employee recreational vehicles or trailers would be prohibited.

3.6 Construction Controls

3.6.1 Air Quality

The project is required to comply with local, state, and federal regulations pertaining to protection of human health, safety, and environment. The following best practice measures to reduce impacts on sensitive receptors should be incorporated into project descriptions as commitments by the County. Note that some of these best practice measures are required by federal, state or local regulations.

Best Management Practices Diesel PM Exhaust from Construction Equipment

- All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 5-minute idling limit.
- Idling, staging, and queuing of diesel equipment within 1,000 feet of sensitive receptors is prohibited.
- All construction equipment shall be maintained in proper tune according to the manufacturer's specifications. Equipment must be checked by a certified mechanic and determined to be running in proper condition before the start of work.
- Implement California Air Resources Board (CARB)-verified diesel emission control strategies as needed to comply with the State In-Use Off-Road Regulation and Truck and Bus Regulation.
- To the extent feasible, truck trips shall be scheduled during non-peak hours to reduce peak hour emissions.
- Proposed truck routes should be evaluated to define routing patterns with the least impact to residential communities and sensitive receptors and identify these receptors in the truck route map.

3.6.2 Geology and Soils

The project would require the County to prepare and submit a Stormwater Pollution Prevention Plan (SWPPP) to the Central Valley Regional Water Quality Control Board (RWQCB) to comply with the National Pollutant Discharge Elimination System (NPDES) Construction Storm Water Permit (Order No. 2009-0009-DWQ) and City's MS4 permit (Order No. 2013-0001-DWQ).

The purpose of the SWPPP is to protect soil and water resources, including groundwater, from impacts during construction. As part of the SWPPP, the contractor would be required to prepare and adhere to a Temporary Best Management Practices (BMP) Plan, a Spill Contingency Plan, and a Dewatering Plan approved by the Central Valley RWQCB. The plan would designate BMPs to minimize impact from erosion and sedimentation. At a minimum, the following geology and soils controls must be implemented:

- Place temporary erosion-control devices downgradient of dirt piles, excavated areas, or stockpiles.
- Place coverings on all dirt piles during non-working hours.
- Install fencing to protect existing vegetation where feasible.
- Revegetate disturbed areas to stabilize soils.
- Stabilize disturbed areas with mulch until vegetation is reestablished.
- Use tracking controls.
- Park only on paved areas.

3.6.3 Hydrology and Water Quality

The project's post-construction water quality obligations are governed by the City's MS4 permit requirements. As discussed above, the project must develop and implement a project specific SWPPP, including a Temporary BMP Plan, a Spill Contingency Plan, and a Dewatering Plan if necessary. These plans must outline measures that will protect hydrology and water quality resources, including groundwater, from negative impacts during construction. The SWPPP would need to be approved by the Central Valley RWQCB.

A Dewatering Plan, if required, must be prepared and submitted for approval by the County and the Central Valley RWQCB prior to commencement of construction.

4 Environmental Evaluation

The following sections evaluate the potential adverse impacts of the project in compliance with CEQA. Appendix G of the CEQA Guidelines (California Natural Resources Agency 2018) provides a sample checklist with a series of questions designed to enable the lead agency, the County, to identify project impacts with respect to 20 environmental topics; this IS generally follows this checklist.

Except where a specific threshold has been adopted by a public agency and is specified in the sections below, such as an air quality threshold, Appendix G of the CEQA Guidelines are used as thresholds of significance for the CEQA checklist questions.

Potential environmental impacts are described as follows:

- **Potentially Significant Impact:** An environmental impact that could be significant and for which no feasible mitigation is known. If any potentially significant impacts are identified in this Checklist, an EIR must be prepared.
- **Less than Significant Impact with Mitigation Incorporated:** An environmental impact that requires the implementation of mitigation measures to reduce that impact to a less than significant level.
- **Less than Significant Impact:** An environmental impact may occur; however, the impact would not exceed significance thresholds.
- **No Impact:** No environmental impacts would result from implementation of the project.

4.1 Aesthetics

4.1.1 Environmental Setting

Gridley is a small city located within the northern Central Valley of California, in Butte County. The City is characterized by generally flat terrain surrounded mostly by agricultural development. The project area is situated in an urbanized area of mixed land uses, including commercial, residential, and recreational properties. There are no California Scenic Highways within the City or within the vicinity of the project area (Caltrans 2024). Views in the area are dominated by commercial and residential buildings, roadways, and the historic Veterans Memorial Hall located on the project site.

The project area is locally zoned as Public Quasi Public with a General Plan designation of Public. .

4.1.2 CEQA Checklist Summary

Except as provided in Public Resources Code Section 21099, would the project:

CEQA Question	Impact Determination
a) Have a substantial adverse effect on a scenic vista?	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway?	Less Than Significant Impact
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less Than Significant Impact
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	Less Than Significant Impact

4.1.3 Answers to CEQA Checklist Questions

Except as provided in Public Resources Code Section 21099:

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

No Impact

The proposed project would not interfere with any scenic vistas. The project area is located in the urbanized City of Gridley, and there are no listed scenic vistas in the area. The project area is currently developed with 2 single story buildings, outbuildings, and surface parking and is surrounded by residential and commercial uses. Therefore, the additional development would have no impact on a scenic vista.

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

Less Than Significant Impact

The proposed project area is not located near a designated state scenic highway (Caltrans 2024). The proposed project area has no rock outcroppings or other scenic resources. There are 2 historic-age buildings located within the project area, 1 of which has been recommended eligible for the National Register of Historic Places and the California Register of Historical Resources (CRHR) (see **Section 4.5**, below). The historic-age buildings are located within the project area to the southwest of the proposed BHC building site. The proposed construction of the BHC will have visual impacts to 1 resource recommended eligible for the CRHR, the Gridley Veterans Memorial Hall. The Gridley Veterans Memorial Hall lies within 1 potentially ineligible historic district and adjacent to a potentially eligible historic district. An architectural review of the properties (NCE 2024b) determined that visual impacts from the new construction would be relatively minor on both the Gridley Veterans Memorial Hall and the historic district, would meet the definition of “no historic properties affected,” as that term is defined in 36 CFR Part 800.4(d)(1), and would not cause a substantial adverse change in the significance of a historical resource, as that term is defined in Public Resources Code (PRC) 5024.1 and CEQA Guidelines Section 15064.5(b)(3).

A tree survey was conducted on-site during the biological resources survey on July 12, 2024; 31 trees were documented on the site, 17 of which border the open space identified for the BHC building (Appendix B, Figure 3). The proposed building site avoids most of the existing trees, which are non-native landscaped trees that do not constitute a scenic resource. Therefore, the project would have a less than significant impact on scenic resources.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact

The proposed project is in an urbanized area. The project would change the visual character from turf to a 1-story public building on a portion of the project area which is zoned for public uses, while upgrading parking and landscaping throughout the site. The building would be located in an area where surrounding buildings do not present a singular consistent style, and the building therefore cannot be designed to match the surrounding architecture. Given the small size of the proposed building, the mixed ages and styles of the surrounding buildings, and pre-existing changes to the visual appearance of the area, the proposed project would not have a significant visual impact on surrounding historic-age buildings. The project plans to utilize, where possible, existing mature trees on the site. Landscaping would also include shrubs, perennials, sod lawn, and groundcover. Therefore, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality.

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

Less Than Significant Impact

The proposed facility would operate from 8 a.m. to 5 p.m. and would have minimal nighttime lighting. The nearest sensitive receptors are associated with residential homes north and east of the site. The residential, commercial, and municipal land uses adjacent to the project area already provide light and glare, and, as such, this project would not result in a significant increase in light or glare in the area. Exterior lighting would be designed with shields and light would be directed only onto the parking and pedestrian areas. A new 6-foot wall would be constructed between the parking areas and existing residential uses, shielding residences from headlights. In addition, the project would be designed to comply with the City's design policy 12.10 regarding site lighting and glare prevention. Therefore, the proposed project would have a less than significant effect on day and nighttime views in the area.

4.2 Agricultural and Forestry Resources

4.2.1 Environmental Setting

The project area is locally zoned as Public Quasi Public with a General Plan designation of Public and is currently occupied by a Veterans Memorial Hall and County Offices. There are no agriculture or forestry land uses on or near the project area.

4.2.2 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code (PRC) § 12220(g)), timberland (as defined by PRC § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	No Impact

4.2.3 Answers to CEQA Checklist Questions

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact

The project is not located in an area of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency (California Department of Conservation 2016). The site is currently developed; therefore, the project would have no impact on farmland or conversion of farmland to non-agricultural use.

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

No Impact

There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance in the vicinity; therefore, there are no Williamson Act contracts in the vicinity. Because there are no agricultural zoning designations and no Williamson Act contracts associated with the project site, there would be no impact.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code (PRC) § 12220(g)), timberland (as defined by PRC § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?

No Impact

There are no forestland or timberland land uses or zoning designations in the project vicinity. The site is currently developed in urban uses and would not result in the conversion of forest land or land zoned for forest land. Therefore, the project does not have the potential to conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.

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

No Impact

Refer to response 4.2.3(c). The project would not result in the loss of forest land or the conversion of forest land.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact

Refer to responses 4.2.3(a-d). The site is currently developed and zoned for public use, and there is no potential for this project to result in a conversion of land from farmland or forest land. Therefore, there would be no impact on farmland or agricultural uses.

4.3 Air Quality

4.3.1 Environmental Setting

The topography of a region can substantially impact air flow and resulting pollutant concentrations. California is divided into 15 air basins with similar topography and meteorology to better manage air quality throughout the state. Each air basin has a local air district that is responsible for identifying and implementing air quality strategies to comply with ambient air quality standards.

The project is located within the northern portion of the Sacramento Valley Air Basin (SVAB). Motor vehicle exhaust is the most significant source of air pollution in the entire SVAB.

4.3.2 Regulatory Setting

Federal and State Air Quality Standards

Air quality in the region is regulated by several agencies including the United States Environmental Protection Agency (EPA) and CARB. These agencies develop rules, regulations, policies, and/or plans to achieve the goals and directives imposed through legislation.

The EPA is responsible for implementing the federal Clean Air Act (1970), including establishing health-based National Ambient Air Quality Standards (NAAQS) for air pollutants. NAAQS are designated for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, PM₁₀, and PM_{2.5}, and lead. The standards set for criteria pollutants are periodically reviewed and revised as applicable. Ozone is not usually emitted directly, instead it is formed in the atmosphere by reaction between reactive organic gases (ROG) and oxides of nitrogen (NO_x). Thus, to prevent unhealthy levels of ozone development, emissions of ROG and NO_x are regulated.

In California, CARB is responsible for implementing the California Clean Air Act (1988) and has established California Ambient Air Quality Standards, which are sometimes more restrictive than the national standards. In general, CARB works with local agencies to develop policies, guidance, and regulations related to state and federal ambient air quality standards. CARB also coordinates with local agencies on transportation plans and strategies and aids local districts and transportation agencies in meeting air quality standards.

Local Air Quality Standards – Butte County Air Quality Management District

The Butte County Air Quality Management District (BCAQMD) has primary responsibility for air quality regulation in the project area. Butte County meets all air quality standards except for 8-hour ozone (marginal). The air district seeks to allow development while working to achieve the 8-hour ozone standard and staying in compliance with the other NAAQS. The air district also enforces general state regulations for nuisance and odors. As part of that role, the BCAQMD has prepared the CEQA Air Quality Handbook, updated in 2024. The purpose of the Handbook is to facilitate the evaluation and review of air quality impacts and recommend mitigation measures as appropriate. The Handbook has established construction significance thresholds for air quality for the priority pollutants shown in **Table 1**. Projects that exceed these thresholds may have to adopt alternative construction schedules or specific mitigation measures.

Table 1. Butte County Air Quality Significance Thresholds

Pollutant	Construction Threshold	Operational Threshold
ROG	137 lbs/day	25 lbs/day
NO _x	137 lbs/day	25 lbs/day
PM ₁₀	80 lbs/day	80 lbs/day

Table Notes:

lbs/day = pounds per day

ROG = reactive organic gases

NO_x = nitrogen oxides

PM = particulate matter; number refers to size of PM in microns in diameter or smaller

4.3.3 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Conflict with or obstruct implementation of the applicable air quality plan?	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Less Than Significant Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	Less Than Significant Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less Than Significant Impact

4.3.4 Answers to CEQA Checklist Questions**a) Would the project conflict with or obstruct implementation of the applicable air quality plan?****No Impact**

Projects that could generate emissions in excess of the BCAQMD thresholds may conflict with or obstruct implementation of the applicable air quality plan. The California Air Pollution Control Officers Association (CAPCOA) has developed a model that can estimate a project's construction and operation emissions. This model, CalEEMod (V2022.1.1.26; CAPCOA 2021), was used to estimate emissions of ROG, NO_x, and PM₁₀. **Appendix A** provides the summary and detailed report of the CalEEMod analysis.

Table 2. CalEEMod Analysis Expected Average Emissions

Pollutant	Construction Daily Maximum	Operation Daily Maximum
ROG	1.1 lbs/day	1.9 lbs/day
NO _x	9.2 lbs/day	0.9 lbs/day
PM ₁₀	5.79 lbs/day	0.7 lbs/day

Table Notes:

lbs/day = pounds per day

ROG = reactive organic gases

NO_x = nitrogen oxides

PM = particulate matter; number refers to size of PM in microns in diameter or smaller

Because the project would generate emissions well below significance thresholds, its implementation would not conflict with or obstruct implementation of applicable air quality plans.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact

The project would be in an identified non-attainment area for 8-hour ozone (marginal). However, model-predicted emissions resulting from project construction and operation (Table 2) fall well below the BCAQMD screening levels. The BCAQMD has determined that projects that do not exceed significance thresholds would not generate emissions that are cumulatively considerable, therefore the impact would be less than significant.

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

Less Than Significant Impact

Construction emissions generate both toxic air contaminants from diesel emissions and particulates (dust). Children, the elderly, asthmatics, and others who are at a heightened risk of negative health outcomes from air pollution are considered sensitive receptors. Locations where sensitive receptors may congregate include hospitals, schools, and daycare centers, and other locations as determined by the BCAQMD or CARB (California Health and Safety Code § 42705.5(a)(5)). There are residences directly abutting the project site and across the street.

The nearest sensitive receptor is a residence approximately 10 feet from the project area parcel line. There are at least a dozen homes within 300 feet of the project. The nearest hospital is Orchard Hospital which is approximately 0.25 miles and the nearest school is Gridley High School which is approximately 0.45 miles. The Veterans Memorial Hall is also a sensitive receptor since it is used by various groups which include sensitive receptors. Appropriate measures should therefore be taken to minimize unnecessary localized construction emissions, even when emissions are below local standards.

To reduce potential impacts to nearby sensitive receptors, the BCAQMD recommends applying BMPs, stated in the BCAQMD CEQA Air Quality Handbook (BCAQMD 2024, Appendix C). The following best practice measures to reduce impacts on sensitive receptors should be incorporated into project descriptions as commitments by the County. Note that some of these best practice measures are required by federal, state, or local regulations. These would be required by the County as standard construction controls (**Section 3.6**).

Best Management Practices Diesel PM Exhaust from Construction Equipment

1. All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 5-minute idling limit.
2. Idling, staging, and queuing of diesel equipment within 1,000 feet of sensitive receptors is prohibited.
3. All construction equipment shall be maintained in proper tune according to the manufacturer's specifications. Equipment must be checked by a certified mechanic and determined to be running in proper condition before the start of work.
4. Implement CARB-verified diesel emission control strategies as needed to comply with the State In-Use Off-Road Regulation and Truck and Bus Regulation.
5. To the extent feasible, truck trips shall be scheduled during non-peak hours to reduce peak hour emissions.
6. Proposed truck routes should be evaluated to define routing patterns with the least impact to residential communities and sensitive receptors and identify these receptors in the truck route map.

Additional measures recommended by BCAQMD (BCAQMD 2024) to reduce particulates include:

1. Construction vehicle speed at the work site must be limited to 15 miles per hour or less.
2. Prior to any ground disturbance, sufficient water must be applied to the area to be disturbed to prevent visible emissions from crossing the property line.
3. Areas to be graded or excavated must be kept adequately wetted to prevent visible emission from crossing the property line.
4. Storage piles must be kept adequately wetted, treated with a chemical dust suppressant, or covered when material is not being added to or removed from the pile.
5. Equipment must be washed down before moving from the property onto a paved public road.
6. Visible track-out on the paved public road must be cleaned using wet sweeping or a HEPA filter equipped vacuum device within 24 hours.

. The project would include the above listed construction controls that protect against significant amounts of toxic air contaminants from diesel emissions and particulate pollutants being generated during construction. Project construction would not expose sensitive receptors to significant localized

dust and toxic air contaminants due to the temporary nature of activities and construction controls for particulates and emissions-generating equipment, as well as distance from the source. Therefore, project impacts on sensitive receptors would be less than significant.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact

Typical sources of noxious odor include wastewater treatment plants, landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, and chemical manufacturing facilities. The proposed project would not generate odors of concern. During construction, diesel exhaust from construction equipment would generate some odors. However, construction would generate associated temporary odors which would not persist upon project completion. Therefore, odor impacts from the proposed project would be less than significant.

4.4 Biological Resources

4.4.1 Environmental Setting

The project area is primarily developed land and includes the Gridley Veterans Memorial Hall and a County office building. The southern portion of the site contains an area of annual grassland dominated by non-native grasses and shrubs, and small patches dominated by Ponderosa pine (*Pinus ponderosa*). The surrounding area is characterized by developed land, including roadways, structures, houses, and largely cleared lots with rubble and debris.

Database Search

A query of federally listed wildlife species for the U.S. Geological Survey 7.5-minute quadrangle encompassing the project area was obtained from the USFWS's Sacramento Endangered Species Office Information Planning and Conservation website on July 22, 2024 (USFWS n.d.). Additional information about the distribution of special status species with the potential to occur within the project area was compiled from the CDFW California Natural Diversity Database for occurrences of special status species within a 1-mile radius of the proposed project area as well as from aerial photographs of the project area. Information on the distribution of special status species with potential to occur in the broader project region was also compiled from USFWS Information for Planning and Consultation review.

The following 7 special status species have occurrence records within 1 mile of the proposed project:

- Giant garter snake (*Thamnophis gigas*)
- Northwestern pond turtle (*Actinemys marmorata*)
- Western spadefoot (*Spea hammondi*)
- Monarch butterfly (*Danaus plexippus*)
- Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)
- Vernal pool fairy shrimp (*Branchinecta lynchi*)
- Vernal pool tadpole shrimp (*Lepidurus packardii*)

The methods and complete findings are provided in **Appendix A** (NCE 2024).

Field Survey

A reconnaissance-level field survey focused on identifying any special status species and their habitat within the project vicinity was conducted on July 12, 2024. No special status species were observed during the survey. Similarly, no aquatic resources were identified in the project area.

A tree survey was also conducted; 31 trees were documented with a dbh greater than 4 inches. Trees with a dbh larger than 4 inches may be prioritized for protection or mitigation due to their ecological, historical, and scenic importance. A tree survey conducted on the project site identified 5 existing trees, including white mulberry (*Morus alba*), glossy privet (*Ligustrum lucidum*), and American sycamore (*Platanus occidentalis*) that would be removed to accommodate proposed site improvements. All identified trees are non-native ornamental species commonly used in urban landscaping. None of these

trees are native to California or considered sensitive, protected, or locally significant under the City of Gridley's ordinances or state or federal regulations.

4.4.2 Regulatory Setting

Migratory Bird Treaty Act

The Migratory Bird Treaty Act makes it unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, or kill migratory birds. The law applies to the removal of nests occupied by migratory birds during the breeding season.

State

California Fish and Game Code (Section 3500) also prohibits the destruction of any nest, egg, or nestling.

Local – Tree Removal

Community Character and Design Element

The Community Character and Design Element of the 2030 General Plan (City of Gridley 2009a) Policy 9.1 directs the City to adopt a tree preservation ordinance; however, there is currently no tree preservation ordinance in the City's Code of Ordinances (current through Ord. 848-2023, passed 7/17/2023).

Conservation Element

Policy 7.1 of the Conservation Element of the General Plan states that existing trees should be preserved along future streetscapes and planned development areas to provide immediate shade. Unhealthy trees and those that present a hazard can be removed.

4.4.3 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish & Wildlife (CDFW) or U.S. Fish & Wildlife Service (USFWS)?	Less Than Significant Impact with Mitigation Incorporated
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?	No Impact
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less Than Significant Impact with Mitigation Incorporated
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less Than Significant Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact

4.4.4 Answers to CEQA Checklist Questions

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish & Wildlife (CDFW) or U.S. Fish & Wildlife Service (USFWS)?

Less Than Significant Impact with Mitigation Incorporated

Seven federally listed wildlife species were identified with the potential to be within 1 mile of the proposed project; the official list is provided in **Appendix A**. Based on the July 12, 2024 survey, background research of occurrence records for special status species, and the lack of suitable habitat present, it is unlikely that any special status species occur within the project area.

However, the project area and adjacent lands contain trees that may provide habitat for migratory birds. Migratory birds are protected under the Migratory Bird Treaty Act, and birds of prey are also protected in California under provisions of the State Fish and Game Code, Section 3503.5. Both make it illegal to “take” protected species except under the terms of a permit. It is possible that nesting habitat could be disturbed during construction due to tree removal, noise, and vibrations from construction equipment. This would be a potentially significant impact on migratory birds and/or birds of prey.

Implementation of Mitigation Measure BIO-1 would reduce potentially significant impacts to migratory birds and/or birds of prey to less than significant.

- **Mitigation Measure BIO-1:** The project would implement the following measures to protect nesting birds:
 1. If any construction activities (e.g., clearing, grubbing, or grading) are scheduled during the bird nesting season (typically defined by CDFW as February 1 to September 1), the approved construction contractor shall retain a qualified biologist to conduct a pre-construction survey of the project area, including a 100-foot buffer, as access is available, to locate active bird nests, identify measures to protect the nests, and locate any other special status species. Surveys shall be conducted in all potential habitat located at project work sites and in staging and storage areas.
 2. The pre-construction survey shall be conducted no more than 5 days prior to the implementation of construction activities (including staging and equipment storage).

3. No active bird nest shall be disturbed unless a qualified biologist determines that the proposed activity will not adversely affect the nesting birds. If avoidance is not feasible, construction activities shall be conducted under the monitoring and direction of a qualified biologist until the young have fledged and the nest is no longer active. The qualified biologist shall observe any identified active nests prior to the start of any construction-related activities to establish a behavioral baseline of the adults and any nestlings. Once work commences, all active nests shall be continuously monitored by the qualified biologist to detect any signs of disturbance and behavioral changes as a result of the project. In addition to direct impacts, such as nest destruction, nesting birds might be affected by noise, vibration, odors and movement of workers or equipment. If signs of disturbance and behavioral changes are observed, the biological personnel responsible shall cease work causing that change and shall contact CDFW for guidance.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?

No Impact

Sensitive natural communities are those listed in the CDFW's California Natural Diversity Database due to the rarity of the community in the state or throughout its entire range. During the site survey, no sensitive natural communities or riparian habitats were identified within or adjacent to the project area. Thus, the proposed project would have no impact on any riparian habitats or sensitive natural communities.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact

The National Wetlands Inventory (NWI) interactive online map was reviewed for the proposed project site (USFWS 2024). According to the NWI, the proposed project is not located on or in the vicinity of a wetland identified by the USFWS. During the reconnaissance survey, no drainages were identified within the project area. Therefore, the project would have no impact on any state or federally protected wetlands.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact with Mitigation Incorporated

There are no established migratory corridors associated with the project area or vicinity. Construction could temporarily interrupt local movement of native resident or migratory wildlife species through the project area.

As discussed above, the project area may contain nesting habitat for migratory birds or birds of prey. With implementation of Mitigation Measure BIO-1, bird species utilizing the project area for nesting would be protected against significant impacts.

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

Less Than Significant Impact

Although recommended in the General Plan, no official tree protection ordinance has been adopted. As noted in Section 4.4.1, all identified trees are non-native ornamental species commonly used in urban landscaping. None of these trees are native to California or considered sensitive, protected, or locally significant under the City of Gridley's ordinances or state or federal regulations. Removal of these trees would not result in a substantial adverse effect on biological resources due to their non-native, ornamental nature and lack of habitat value for special status species. Therefore, the proposed project would not significantly conflict with local policies and ordinances protecting biological resources.

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

No Impact

There are no known Habitat Conservation or Natural Community Conservation Plans associated with the project area. No impacts are anticipated, and no mitigation measures are required.

4.5 Cultural Resources

4.5.1 Environmental Setting

The project area contains the Gridley Veterans Memorial Hall and the Butte County Offices, areas of landscaped open space, a parking lot, 2 sheds, a shipping container, and a variety of monuments. NCE conducted an intensive cultural resources inventory of the project area to locate, describe, and evaluate cultural resources. An Area of Potential Effect (APE) was defined as encompassing the project area and several parcels beyond the project area, adjacent to where the BHC would be constructed.

4.5.2 Regulatory Setting

Federal

The National Historic Preservation Act (NHPA) of 1966 defined the role and responsibilities of the federal government in historic preservation and established the National Register of Historic Places. The NHPA directs agencies to identify and manage historic properties under their control, to undertake actions that would advance the its provisions and avoid actions contrary to its purposes, to consult with others while carrying out historic preservation activities, and to consider the effects of their actions on historic properties.

State

California Register of Historical Resources

The CRHR is a guide to cultural resources that must be considered when a government agency undertakes a discretionary action subject to CEQA. The CRHR helps government agencies identify and evaluate California's historical resources and indicates which properties are to be protected, to the extent prudent and feasible, from substantial adverse change (PRC § 5024.1(a)). Any resource listed in, or eligible for listing in, the CRHR must be considered during the CEQA process.

4.5.3 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?	Less Than Significant Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?	Less Than Significant Impact
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	Less Than Significant Impact

4.5.4 Answers to CEQA Checklist Questions

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?

Less Than Significant Impact

A survey was conducted on July 3, 2024, to identify any cultural resources in the project area. The survey identified 2 primary architectural resources recorded within the project area. The project area also lies adjacent to a potential historic district, the historic core of Gridley, and within a second potential historic district, a small early 20th century addition to the historic core of Gridley. NCE evaluated the 2 primary architectural resources for National Register of Historic Places (National Register) and CRHR eligibility and provided preliminary assessments of the potential historic district (NCE 2024b).

The Cultural Resources Inventory Report recommends the Gridley Veterans Memorial Hall as being eligible for the National Register and the CRHR under Criteria A/1 and C/3, and that the Butte County Offices is not eligible for the National Register or the CRHR under any of the criteria. The preliminary assessment of the 2 potential historic districts suggested that the historic core of Gridley may be eligible for the National Register and the CRHR under Criteria A/1, B/2, and C/3, and that the small early 20th century addition to the eastern edge of the historic core of Gridley is not considered eligible for the CRHR.

The proposed merging of the 4 parcels within the project area is an administrative action and will have no effects that would impact either known or unknown cultural resources located within the project area. The proposed construction of the BHC will have visual impacts to the resource recommended eligible for the National Register, the Gridley Veterans Memorial Hall. These visual impacts are considered by NCE's architectural historian to be relatively minor and would not constitute an adverse effect to a historic property. The Gridley Veterans Memorial Hall is also adjacent to a potentially eligible historic district. It was further determined that potential visual impacts to the potential historic districts would be relatively minor and would not constitute an adverse effect to a historic property. The State Office of Historic Preservation agreed with this assessment during Section 106 review for the proposed federal funding. Therefore, the project would have a less than significant impact on historical resources.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?

Less than Significant Impact

The search results indicated no archaeological sites or inventories were previously recorded within the APE, nor have any archaeological sites been formally recorded within 100 meters of the APE.

A pedestrian survey of visible ground surfaces in the project area did not identify any previously unrecorded archaeological resources. Historical research suggested that the area surrounding the proposed project area was not developed until the 1910s, and that the project area was not developed until the 1920s, limiting the potential for historic-age archaeological resources within the project area. No records exist that suggest that archaeological materials were encountered during previous construction work within the proposed project area or the surrounding areas. The APE is considered to have low archaeological sensitivity, and unanticipated discoveries are not expected. Therefore, the

proposed project would have a less than significant impact on archaeological resources during construction.

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

Less than Significant Impact

Based on the historic uses of the area, the absence of any previous documentation of human remains within the proposed project area or the surrounding area, and the minimal construction depths of the proposed construction activities, human remains are not expected to be discovered during construction activities. State law mandates the approach to identifying and mitigating unanticipated discoveries during construction. Please see **Tribal Cultural Resources** for discussion regarding unanticipated prehistoric remains.

4.6 Energy

4.6.1 Environmental Setting

The state relies on energy conservation, waste reduction practices, sustainable buildings, and innovative land use planning to reduce energy impacts. The means of achieving this goal include:

- Decreasing overall per capita energy consumption.
- Decreasing reliance on natural gas and oil.
- Increasing reliance on renewable energy resources.

Energy within the project area is currently used by the Veterans Memorial Hall and the County Office building, and for lighting on the site and irrigation.

4.6.2 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less Than Significant Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant Impact

4.6.3 Answers to CEQA Checklist Questions

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

Less Than Significant Impact

Both construction and operation of the proposed project would result in energy consumption. However, as discussed in Section 3.6, project construction would implement BMPs, which include reducing use of fossil fuels and increasing energy efficiency of construction vehicles.

The proposed project would introduce new public services uses to the site, which would use energy for powering the building, as well as staff and visitors accessing the site. Building construction would be generally consistent with the goals and policies related to energy in the City of Gridley 2030 General Plan, Conservation Element Policy 8.1 – 8.5 (City of Gridley 2009a) and Title 24 of the State Building Code. The building would incorporate energy-efficient features in accordance with City and state requirements, and 7 EV charging spaces connected to the solar system would be provided to encourage a reduction in fossil fuel consumption. Proposed sustainability features include thermal solar panels to provide site electrical service.

The proposed project would develop public services in an existing residential area served by 2 transit lines, which would help minimize any increase in vehicle trips, and thereby minimize any increase in fossil fuel energy consumption. Workers and visitors have access to public transit to reach the project area and other amenities, thereby further reducing additional motor vehicle trips (see Section 4.17, Transportation).

Because project construction would include implementation of BMPs, new building construction requirements, access to transit, and the incorporation of solar power, the project overall would not result in inefficient, wasteful, or unnecessary use of energy and would have a less than significant impact.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact

The proposed project is an infill infrastructure project on existing developed parcels, consistent with sustainability goals for the state and the City. The project would meet or exceed Title 24 construction requirements and implement BMPs to reduce fossil fuel use by construction vehicles. The proposed 2024 California Building Code would require solar panels on commercial buildings; the proposed project will provide solar to further reduce energy demand, consistent with the proposed Code requirement for the local zoning. The project would therefore not conflict with adopted state and City goals and policies for energy efficiency and sustainability.

4.7 Geology and Soils

4.7.1 Environmental Setting

Regional Geologic Setting

The project area is in the Sacramento Valley, which forms the northern portion of the Central Valley geomorphic province. The Central Valley is an approximately 50-mile-wide and 400-mile-long alluvial plain that lies between the foothills of the Sierra Nevada to the east and the Coast Ranges to the west. The valley is underlain by an asymmetrical depression (formed by intersecting, downward sloping folds of bedrock) in which marine sediments from the receding ocean were followed more recently by river deposits (alluvial deposits) washing down from the Sierra Nevada and the Klamath, Cascade, and Coast Ranges. The Central Valley covers more than 6,500 square miles and fills a northwest-trending structural depression bounded on the west by the Central Valley fault zone and the Coast Ranges and on the east by the Sierra Nevada and the Foothills fault zone. Relatively few faults in the Central Valley have been active during the last 10,000 years. Most of the surface of the Central Valley is covered with Holocene and Pleistocene-age alluvium, composed primarily of sediments from the Sierra Nevada and the Coast Ranges that were carried by water and deposited on the valley floor. Siltstone, claystone, and sandstone are the primary types of sedimentary deposits (City of Gridley 2009a).

Seismicity and Faulting

Active faults are those that have moved during the past 11,000 years, and generally only active faults are considered in evaluating seismic risk for building construction. There are no active faults or major earthquake epicenters in the City. The nearest active fault to the City is the Cleveland Hills Fault, located near Lake Oroville approximately 22 miles northeast of the project area. Ground shaking resulting from seismic activity is present within the City (City of Gridley 2009a).

Liquefaction

Liquefaction can occur when wet or saturated cohesionless soil temporarily loses strength due to the buildup of excess water pressure during events such as earthquakes. The soil most susceptible to liquefaction is loose, clean, saturated, uniformly graded sand. The project area is overlain by dense soils underlain by bedrock at shallow depths; thus, the potential for liquefaction at the project site is low to moderate (City of Gridley 2009a).

Groundwater

The project area is located within the Sacramento River Hydrologic Region North Yuba Subbasin as defined by the Department of Water Resources. The Sustainable Groundwater Management Act Data Viewer (Department of Water Resources n.d.) shows regional groundwater depths and flow directions on an interactive map. Fall 2023 groundwater in the project area is depicted at an approximate depth of 10 feet below ground surface and flow direction is generally to the east (Department of Water Resources n.d.).

Soils

There is 1 Natural Resource Conservation Service (NRCS) Soil Survey soil mapped in the project area. The soil unit that can be found in the project area is classified as Gridley taxadjunct loam 0 – 2% slope. It consists of moderately deep, moderately well drained soils formed in alluvium from mixed sources. These soils are on low terraces and basin rims and have slopes of 0 to 1% (NRCS 2024).

4.7.2 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Could the project directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	Less Than Significant Impact
ii. Strong seismic ground shaking?	Less Than Significant Impact
iii. Seismic-related ground failure, including liquefaction?	Less Than Significant Impact
iv. Landslides?	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	Less Than Significant Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less Than Significant Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	No Impact

4.7.3 Answers to CEQA Checklist Questions

a) Would the project directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other

substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**Less Than Significant Impact**

The project area is not within an Alquist-Priolo Earthquake Fault Zone that designates a known active fault (a fault is defined as active if it has ruptured or shows evidence of displacement in the Holocene or the last 11,000 years) that is susceptible to fault rupture as defined by the California Geologic Survey (formerly the California Division of Mines and Geology). Although the area is seismically active, there is no evidence of faults in or within 3 miles of the project area that could be subject to rupture.

The proposed project would be constructed in accordance with local, state, and federal earthquake safety regulations. Therefore, the project would have a less than significant impact related to loss of life and/or injury from a rupture of a known earthquake fault.

ii. Strong seismic ground shaking?**Less Than Significant Impact**

There are no active faults within 3 miles of the project area. However, Cleveland Hills fault, an active fault located 22 miles northeast of the project area, is a geologic hazard with the potential for moderate ground shaking. Factors determining the characteristics of earthquake ground motion at the project area would depend upon the magnitude of the earthquake, distance from the zone of energy release, travel path, topographic effects, subsurface materials, and rupture/source mechanism.

As part of the project design process, a geotechnical report would be prepared to provide guidance and requirements for design and construction activities. Registered geologists and registered engineers would prepare the report, which would describe the methods and results of a geotechnical investigation; develop design recommendations for foundation type, grading, pavement design, and other pertinent topics; and verify that the proposed project can develop the site as planned. All buildings would be built in conformance with the requirements of the California Building Code to withstand anticipated geological risks. The project could expose people or structures to adverse effects involving moderate seismic ground shaking, but the potential risks are mitigated through building design, and seismic impacts are therefore less than significant.

iii. Seismic-related ground failure, including liquefaction?**Less Than Significant Impact**

As discussed in the Environmental Setting, based on the subsurface characteristics, the potential for soil liquefaction at the project site is low. The facility would be designed to withstand strong ground motion and ground failure (liquefaction) resulting from a design earthquake in accordance with the adopted standards. The proposed project would incorporate the recommended project design specifications outlined in the required geotechnical investigation; therefore, no additional project specific mitigation measures are proposed and impacts resulting from liquefaction are anticipated to be less than significant.

iv. Landslides?**No Impact**

The project area is flat and partially developed. There are no slopes in the project vicinity. The project would not cause potential substantial adverse effects involving landslides.

b) Would the project result in substantial soil erosion or the loss of topsoil?**Less Than Significant Impact**

The project area is flat and is partially developed. The potential for substantial soil erosion is considered minimal since BMPs would minimize potential soil erosion during construction. Such BMPs could include, but are not limited to, using a sediment trap for all drains, and placing straw bale barriers and/or mulch (straw or hydraulic) throughout the property. The construction controls implemented as part of the SWPPP (Section 3.6.2) would ensure that this impact would be less than significant.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on/or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**Less Than Significant Impact**

Lateral spreading occurs when the ground slides down very gentle slopes or toward stream banks riding on a buried liquefied layer. There are no streams or slopes on or adjacent to the project area. The proposed project would incorporate the recommended project design specifications outlined in the required geotechnical investigation to ensure the project would not result in subsidence, liquefaction or collapse. See response to question 4.7.3a(iii), above.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**No Impact**

The project area does not contain expansive soils as defined in Table 18-1-B of the Uniform Building Code (1994). The project would comply with federal, state, and local building regulations to ensure the adequate design and construction of building foundations to resist soil movement. The project would not create substantial direct or indirect risks to life or property, therefore there would be no impact.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**No Impact**

The project does not propose the use of in-ground sewage disposal such as septic tanks/leachfields and would not require use of alternative wastewater disposal services. Therefore, there would be no impact from these systems.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**No Impact**

The North Central Information Center records search revealed there are no paleontological resources identified within the project area. No unique geological resources were identified within the project boundary and no sedimentary fossiliferous geologic structures underlie the project area. Therefore, the project would not directly or indirectly destroy any unique paleontological resources or unique geologic feature.

4.8 Greenhouse Gas Emissions

The term greenhouse gas (GHG) is used to describe atmospheric gases that absorb solar radiation and subsequently emit radiation in the thermal infrared region of the energy spectrum, trapping heat in the Earth's atmosphere. Greenhouse gases of concern include carbon dioxide, methane, nitrous oxide, and fluorinated gases. Unlike emissions of criteria and toxic air pollutants, which have local or regional impacts, emissions of greenhouse gases have a broader, global impact.

Greenhouse gases differ by the amount of heat each traps in the atmosphere, known as global warming potential. Carbon dioxide is the most significant greenhouse gas, so amounts of other gases are expressed relative to carbon dioxide, using a metric called "carbon dioxide equivalent" (CO₂e). The global warming potential of carbon dioxide is assigned a value of 1, and the warming potential of other gases is assessed as multiples of carbon dioxide. Generally, estimates of all greenhouse gases are summed to obtain total emissions for a project or given time period, usually expressed in metric tons or million metric tons CO₂e.

4.8.1 Environmental Setting

The primary source of GHGs within Butte County is fossil fuel consumption from the agriculture sector, representing approximately 50% of countywide GHG emissions. Other sources of GHG emissions include (Butte County 2021):

- Transportation (approximately 23%)
- Residential energy (approximately 9%)
- Nonresidential energy (approximately 4%)
- Off-road vehicles and equipment (approximately 6%)
- Solid waste (approximately 6%)
- Wastewater treatment (approximately 2%)

4.8.2 Regulatory Setting

Federal

The EPA has no regulations or legislation enacted specifically addressing GHG emissions reductions and climate change at the project level. In addition, the EPA has not issued explicit guidance or methods to conduct project level GHG analysis.

State

The State of California has taken several legislative steps including Assembly Bills (AB) and Executive Orders to reduce increases in GHG emissions. CARB is the lead agency in the development of reduction strategies for GHGs in California (CARB 2022). California's GHG reduction requirements aim to reduce vehicle miles traveled, thereby improving air quality by reducing GHG emissions from automobiles.

Homes and businesses use nearly 70% of California's electricity and are responsible for a quarter of California's GHG emissions. As California's energy policy agency, the California Energy Commission is

mandated by the Warren-Alquist Act to periodically update and adopt building standards to increase energy efficiency of buildings and reduce GHGs. Part 6 of Title 24 implemented this mandate so that every 3 years the California Energy Commission presents Building Energy Efficiency Standards (Energy Code) updates for new construction and renovations to existing buildings. The most recent update was completed in 2024, with the 2025 Energy Code formally adopted and scheduled to take effect on January 1, 2026.

Local

BCAQMD

BCAQMD has no adopted threshold for GHG emissions; however, the BCAQMD states compliance with the State Scoping Plan. These thresholds limit GHG emissions to 1,100 metric tons CO₂e per year for the construction phase of projects or the operational phase of land use development projects, or 10,000 direct metric tons CO₂e per year from stationary source projects.

If a project exceeds this threshold, the level of mitigation is based on demonstrating consistency with CARB's Climate Change Scoping Plan and the AB 32 goal for reducing GHG emissions.

Infill development is recognized by the County's Regional Plan, as well as the State of California, as needed to reduce vehicle miles traveled and the regional impact of development on air quality and climate change.

Butte County Climate Action Plan

The Butte County Climate Action Plan (CAP) is an implementation mechanism of the County's General Plan adopted in 2010 and updated in 2021, providing goals, policies, and programs to reduce GHG emissions, address climate change adaptation, and improve quality of life in the County. The CAP also supports statewide GHG emissions reduction goals identified in AB 32 and SB 375. Programs and actions in the CAP will help the County sustain its natural resources, grow efficiently, ensure long-term resiliency to a changing environmental and economic climate, and improve transportation.

4.8.3 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant Impact

4.8.4 Answers to CEQA Checklist Questions

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact

The proposed project would construct a public facility on an infill lot in compliance with City and State requirements and sustainability goals. Sustainability features would include energy-efficient building exterior walls and utility systems, which would help minimize the carbon footprint for the project. The project area would be accessible via public transit, minimizing motor vehicle trips.

The project would incorporate measures developed by BCAQMD for reducing construction-related GHG emissions. As presented in Section 4.3, the project would implement BMPs which include measures to improve fuel efficiency, minimize idling, and limit emissions during construction.

As discussed in Section 4.3, Air Quality, the project falls well below the BCAQMD operational and construction screening levels for development projects, and therefore well below 1,100 metric tons CO₂e per year. Therefore, the project would not result in long-term GHG emissions or overall increases in GHGs from operational or construction sources and impacts would be less than significant.

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

Less Than Significant Impact

As discussed above, the project would have a less than significant contribution to GHG emissions during construction and operation. During construction, emissions would be short-term and well below the significance threshold. Once operational, the project would help attain the state's goals defined in AB 32 as an infill project with transit access; therefore, the project would not conflict with state and regional goals to reduce GHG emissions and impacts would be less than significant.

4.9 Hazards and Hazardous Materials

4.9.1 Environmental Setting

The project area is zoned Public Quasi Public and is developed with the Veterans Memorial Hall constructed in 1926, County administrative offices built sometime between 1969 and 1973, and a shed and shipping container on the southeastern portion. Construction practices prior to 1978 typically involved the use of lead-based paint, asbestos building materials, and other hazardous materials.

A Phase I Environmental Site Assessment (ESA) was prepared in January 2025 (NCE 2025a) to identify and confirm, to the extent feasible, the potential for Recognized Environmental Conditions resulting from the improper use, manufacture, storage, and/or disposal of hazardous or toxic substances at or in the vicinity of the project area that may be encountered during construction. Regulatory database search results indicated that most listed sites (pursuant to Government Code 65962.5) in the region are located in the commercial areas approximately 0.5 miles northeast and southeast of the proposed project area, along State Highway 99. One hazardous waste site in the immediate project vicinity was identified in the GeoTracker (State Water Resources Control Board n.d.) database: Joe's Super Stop (formerly Tom's Sierra Superstop #17), located approximately 205 feet east of the site at 1627 Highway 99. This facility had a previous leaking underground storage tank case that was granted regulatory closure in June 2011. Two monitoring wells that were previously installed in the project area showed no detectable concentrations of petroleum hydrocarbons at the time of well abandonment. The ESA concluded that that this facility is unlikely to pose a risk to current and future users of the project area (NCE 2025a).

The Phase I ESA did not identify any Recognized Environmental Conditions but did indicate that the use of hazardous building materials in the existing buildings as noted above should be presumed in connection with structures in the project area, as well as the potential for elevated lead levels in near surface soils as a result of aeri ally deposited lead (ADL) along Sycamore Street.

Based on these findings, a Limited Phase II ESA (NCE 2025b), was conducted to assess the presence of elevated levels of ADL in surface and shallow soil and conditions in the project area with the potential to impact construction activities, create exposures to workers and the public during construction, and/or impact future users of the project including residents. Considering that the future use of the site is proposed for a behavioral health center, analytical results were compared to the San Francisco Bay RWQCB Residential (most conservative), Commercial, and Construction Worker Shallow Soil Exposure Environmental Screening Levels (ESLs). Results identified 3 surface soil samples collected in the northwestern portion of the project area exceeded residential safety levels for lead (80 mg/kg), with 2 of these samples, located north of the Veterans Memorial Hall, exceeding construction worker safety levels (160 mg/kg) (Forensic Analytics Consulting Services 2024).

4.9.2 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less Than Significant Impact with Mitigation Incorporated
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less Than Significant Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Less Than Significant Impact

4.9.3 Answers to CEQA Checklist Questions

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

Less Than Significant Impact

The proposed project does not involve any routine transport, disposal, or use of hazardous materials beyond those used during construction or normal maintenance. Sycamore Street, the roadway abutting the project area, is not used as a route for transporting hazardous materials.

The project's use of hazardous materials during construction is limited to fuels and other maintenance-related chemicals to run machinery. The use, storage, and management of fuels and other vehicle-related chemicals and construction materials during construction would be managed according to the on-site SWPPP. For example, the SWPPP would require that equipment fueling and maintenance, if performed at the job site, be performed in a designated area utilizing secondary containment with a spill kit nearby. Rinsing of concrete tools and chutes would also be performed according to the SWPPP, including utilizing concrete washouts and/or requiring that wastewater be kept within the concrete truck and hauled off-site for recycling.

Operational use of hazardous materials by the BHC would consist mainly of cleaning, maintenance, and gardening supplies, as well as prescription medications for distribution to patients as part of their treatment plans. Household hazardous waste is handled by Butte Regional Household Hazardous Waste Facility.

The Department of Transportation limits the volume of hazardous waste that can be transported at 1 time to 15 gallons (combined total). Therefore, the use of hazardous materials during construction and operation would be limited and would not create a significant hazard to the public or the environment.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact with Mitigation Incorporated

Construction would involve ground disturbing activities that would disturb soils identified in the Phase II ESA as containing elevated levels of lead. Concentrations of total lead in 3 surface soil exceeded the residential ESL. The samples were collected from the northwestern portion of the site, at the intersection of Haskell and Sycamore Streets, and adjacent to the north of the Veterans Memorial Hall. Concentrations of total lead in 2 surface soil samples collected from adjacent to the north of the Veterans Memorial Hall also exceeded the construction worker ESL. However, the average concentration of lead in site soil surface samples is below the construction worker ESL of 160 mg/kg. The proposed development and future use of the site for commercial purposes is consistent with the values of total lead identified in surface soils, and site soils do not appear to pose a human health threat to worker and/or construction worker safety.

However, because levels of lead and arsenic have been identified as present in the project area, it is recommended contractors should be made aware of the results of the soils investigation so they can design worker health and safety plans as warranted, and all excess soil generated as part of construction be stockpiled and profiled for disposal according to the requirements of the selected landfill.

Implementation of **Mitigation Measures HAZ-1 and HAZ-2** would reduce potential exposure of construction workers to soil contaminants or release of contaminants through inappropriate disposal to less than significant.

- **Mitigation Measure HAZ-1:** The contractor shall develop and implement a Health and Safety Plan for construction workers. The protocols will specify how to eliminate or reduce exposure to soils where contamination may be present. Prior to any ground disturbing activities, the contractor shall document that workers are trained on the protocols and must provide a copy of the final Health and Safety Plan on the job site.
- **Mitigation Measure HAZ-2:** All excess soil generated as part of construction and renovation to the site shall be stockpiled and profiled for disposal according to the requirements of the selected landfill.

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

Less Than Significant Impact

The nearest school is Wilson Elementary School, located approximately 0.08 miles southwest of the project area. As discussed above, hazardous materials used as part of the proposed project are anticipated to be limited. Construction-related vehicles would produce routine emissions that would be temporary and less than significant. For a discussion on air quality, see Section 4.3, Air Quality.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact

EnviroStor is the DTSC's data management system for tracking cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate further, also known as the Cortese List. As noted above, no sites in the project vicinity were identified on EnviroStor.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact

The nearest airport, Oroville Municipal Airport, is approximately 7.95 miles north of the project area. As such, the proposed project would not result in a safety hazard or excessive noise for people working in or residing near the project area.

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

No Impact

Gridley was a participant in the development of the Butte County Multi-Jurisdictional Hazard Pre-Disaster Mitigation Plan, adopted in March of 2007 and updated in 2024 (Butte County 2024). The project involves infill redevelopment and would not impact implementation of the Butte County Multi-Jurisdictional Hazard Pre-Disaster Mitigation Plan. No change in roadways or access is proposed. Additionally, according to the City's 2030 General Plan, State Highway 99 is designated as a potential evacuation route. Although the proposed project area is located approximately 0.07 miles east of State Highway 99, it would not impede or affect the functionality of this existing evacuation route.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact

The project area is an urban infill project within the historic part of the City, and no wildlands are adjacent to it. However, the site is near an area that has a high wildfire risk and a fire in this area has the potential to expose people or structures in the vicinity to wildland fires. The BHC would be designed and built according to current State Building Codes to reduce the risk exposure of people or structures involving wildland fires. See Section 4.20 for further discussion of wildfire potential.

4.10 Hydrology and Water Quality

4.10.1 Environmental Setting

Watershed and Water Quality

The proposed project is located in the City portion of the Sutter Bypass Watershed. The Sutter Bypass Watershed is about 276 square miles and is bound by the Feather River to the east.

The Feather River is the main waterway near the project area. The Feather River, which has a watershed that encompasses approximately 3,200 square miles from the western slope of the Sierra Nevada to the city of Sacramento, is a tributary to the Sacramento River. No surface water bodies are on or adjacent to the project area.

Groundwater

The project area is in the northern Sacramento Valley Groundwater Basin. The surface expression of the subbasin boundary is defined on the north by the service area boundary of the Western Canal Water District, on the east by the Feather River, on the south by the Butte-Sutter County boundary, on the southwest by the service area boundary of Reclamation 1004, and on the west by the Butte-Colusa County boundary, the Sacramento River, and the Butte-Glenn County boundary. The general direction of drainage is southwest. Groundwater elevations throughout much of the Gridley area are high, about 8 – 10 feet below the surface. Drainage rates are slow due to relatively flat terrain, with an average gradient of 0.5 foot per thousand feet in the ditches and sloughs.

Flood, Tsunami and Seiche Hazards

The project area is delineated on Federal Emergency Management Agency (FEMA) map panel 06007C1125E, effective 1/6/2011. The project area is designated as Zone X, 0.2% Annual Chance Flood Hazard, areas of 1% annual chance flood with average depth less than 1 foot or with drainage areas of less than 1 square mile. The project area is not located in an area near the ocean nor a large body of water that could be impacted by seiche, tsunami, or mudflow.

4.10.2 Regulatory Setting

Federal

Clean Water Act and NPDES Permit

Section 402 of the Clean Water Act requires NPDES permits for stormwater discharges from municipal storm drain systems. The Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Central Valley RWQCB 2018) is the Central Valley RWQCB's planning document. The Central Valley RWQCB issues the municipal stormwater NPDES permits to address stormwater impairments and recommend actions. Stormwater discharges into the City's municipal stormwater drainage system are regulated by the Central Valley RWQCB under the Municipal Regional Stormwater NPDES Permit, Order No. R2-2015-0049.

Section 303(d) of the Clean Water Act authorizes the EPA to assist jurisdictions in listing impaired waters and developing Total Maximum Daily Loads for these waterbodies. A Total Maximum Daily Load establishes the maximum levels of each pollutant allowed in a water body and serves as the starting

point or planning tool for restoring water quality. In California, state and regional water boards assess water quality monitoring data for the state's surface waters every 2 years to determine if they contain pollutants at levels that exceed protective water quality standards. Water bodies and pollutants that exceed these standards are placed on the state's 303(d) List. The determination is governed by the Water Quality Control Policy for developing California's Clean Water Act Section 303(d) List.

State

Statewide Construction General Permit

Because the proposed project would disturb more than 1 acre, it is subject to the statewide Construction General Permit Order 2009-0009-DWQ, which regulates stormwater leaving construction sites. Under this order, site owners must notify the state and implement a SWPPP prepared by a Qualified SWPPP Developer. The SWPPP must outline measures that would protect hydrology and water quality resources, including groundwater, from negative impacts during construction through implementation of BMPs and monitoring the effectiveness of BMPs. This permit is administered by the State Water Resources Control Board and overseen by the RWQCB.

Local

According to Chapter 13.20 of the Gridley Municipal Code, specifically Section 13.20.015, stormwater detention facilities are required for new developments. This means developers must design and construct systems that limit peak stormwater flows from their sites, effectively ensuring that runoff from new development does not exceed pre-development levels.

4.10.3 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Less Than Significant Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	Less Than Significant Impact
i. result in substantial erosion or siltation on/or off-site;	
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on/or off-site;	No Impact
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	No Impact
iv. impede or redirect flood flows?	Less Than Significant Impact

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less Than Significant Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant Impact

4.10.4 Answers to CEQA Checklist Questions

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact

During the construction phase, the project would be subject to the requirements of the Construction General Permit, which requires implementation of a SWPPP, and various monitoring and reporting activities, depending on the project's risk level.

During the construction phase, the project would implement standard stormwater BMPs, such as erosion controls, soil barriers, sedimentation basins, site contouring, and others, that would be used during construction activities to minimize runoff of soils and associated contaminants. Erosion controls are used during construction to reduce the quantity of disturbed soils and to prevent disturbed soils from entering runoff. Erosion controls can include logistical practices, such as scheduling construction during seasons with the least potential for erosion (e.g., non-storm seasons, and sediment control practices).

Sediment basins and sediment traps are engineered impoundments that allow soils to settle out of runoff prior to discharge to receiving waters. Filter fabric fences and straw bale barriers are used under different site conditions to filter soils from runoff. Inlet protection consists of a barrier placed around a storm drain drop inlet to trap soils before they enter a storm drain. One or more of these types of runoff control structures would be placed and maintained around the construction area to minimize loss of site soils to the storm drain system. Although the specific BMPs that would be used at the proposed project area have not yet been designed, it is reasonable to estimate that erosion and runoff control BMPs would be effective at removing soils from any runoff that occurs during construction.

Spills associated with construction equipment, such as oil/fluid drips or gasoline/diesel spills during fueling, typically involve small volumes that can be effectively contained in the work area and cleaned up immediately. Other spills of fuels and lubricants from construction equipment on land would have a very low potential to occur and enter storm drains, including during the rainy season, due to implementation of BMPs in the project specific SWPPP.

Construction activities associated with the proposed project would not result in discharges that create pollution, contamination, or nuisance, or cause regulatory standards to be violated. Some minor changes to water quality could occur as a result of installing 18-inch piers, the foundation, or paving, but these changes would not affect beneficial uses.

Once constructed, the project would be connected to the City's existing storm drainage system located on Sycamore Street. Stormwater drainage would be directed into the Butte Sink, Sacramento River, Live Oak Slough, and the Feather River. The City requires that the project result in no change in stormwater volume entering the stormwater system. Whereas the proposed BHC building site is currently mostly

covered in lawn, it is possible there would be a net increase in stormwater generated on the site, and the site design must ensure runoff from new development does not exceed pre-development levels per County code.

Through implementation of BMPs, the proposed project would ensure that the City's NPDES permit requirements are met relative to flows from the project area, and, by doing so, it is anticipated that water quality standards would be maintained. Furthermore, through the inclusion of the BMPs, it is anticipated that the proposed project would not violate any applicable permit requirements, water quality standards in receiving waters would be maintained, and the proposed project would have less than significant impact on either surface or groundwater water quality.

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

No Impact

The project would not involve groundwater extraction or dewatering. The City's potable water supply comes from 7 wells throughout the City. The project is located approximately 390 feet from "Wilson Well" at 390 Magnolia Street. Groundwater is anticipated to be 10 feet below ground surface in this area, and depth of construction would not exceed 4 feet, thus no dewatering is anticipated during construction. Therefore, the proposed project would have no impact on groundwater supplies.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial erosion or siltation on or off-site?

Less Than Significant Impact

Construction of the proposed project would require grading and trenching that would disturb the ground surface, but there are no streams or rivers on or adjacent to the project area. Ground surface disturbance would result from installation of the foundation system for the proposed structure and placement of underground utilities. Since construction activities would include work during 1 or more rainy seasons, soils exposed by grading and trenching would be subject to erosion by stormwater runoff and/or possibly wind. The new BHC building would also increase the area of impervious surface on the site by approximately 10,100 square feet; however, as discussed above, the City requires no net increase in drainage entering the stormwater system.

Construction sites would be managed by complying with the project's NPDES general stormwater permit, which requires preparation and implementation of a project specific SWPPP. Standard construction BMPs would include both procedural and structural controls. Procedural controls include minimizing the amount and duration of soils exposed during grading and trenching, washing dirt off of construction equipment, and refueling only in designated areas as previously discussed. Structural BMPs can include silt fences/straw bale barriers or sedimentation basins that would be installed and maintained during construction to minimize sediment runoff. Maintenance of these control measures

would include daily checks of systems during the rainy season. The construction contractor would be responsible for ensuring compliance with permit conditions. No water quality standards or objectives would be exceeded with appropriate implementation and maintenance of required BMPs.

Construction activities associated with the proposed project would not accelerate erosion or sedimentation that would not be contained on-site with the implementation and maintenance of required BMPs. Once constructed, the project would be connected to the City's existing storm drainage system and would not accelerate erosion or sedimentation. Therefore, impacts to drainage patterns from erosion and sedimentation would be less than significant. No mitigation is required as the SWPPP would provide adequate environmental protection for erosion and sediment.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on/or off-site?

No Impact

The proposed project would replace an existing lawn area with approximately 10,100 square feet (about 1/3 of an acre) of new building footprint, increasing impervious surfaces on the project area. Although impervious surface area would increase, the City requires all new development to incorporate stormwater drainage and detention measures to ensure there is no net increase in off-site runoff or flooding. Stormwater in the project vicinity is collected along Sycamore Street and conveyed through the City's drainage system to facilities maintained by Reclamation District No. 833, Reclamation District No. 2056, and Drainage District No. 1, which ultimately discharge to Butte Sink, the Sacramento River, Live Oak Slough, and the Feather River. Therefore, the project must be designed in compliance with these standards and would not result in an increase in flooding on- or off-site.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

No Impact

As discussed in Section 4.10.4b(ii), above the project would increase impervious surface area by constructing a 10,100-square-foot building; however, the City requires new development to incorporate stormwater management measures to ensure no net increase in runoff beyond existing system capacity. The project must be designed consistent with City standards for stormwater collection and treatment, which would connect to established facilities along Sycamore Street that are maintained by local reclamation and drainage districts. In addition, compliance with state and local water quality requirements would prevent the project from introducing substantial additional sources of polluted runoff. Therefore, the project would not exceed the capacity of stormwater drainage systems or result in significant water quality impacts.

iv) Impede or redirect flood flows?

Less Than Significant Impact

The project is located within FEMA Zone X, which includes areas subject to 0.2% annual chance flood (500-year floodplain) or 1% annual chance flood with average depths of less than 1 foot or with drainage

areas less than 1 square mile. While this zone indicates a reduced flood risk compared to higher-risk areas, some potential for flooding exists.

Given the nature of Zone X, significant flood flows are infrequent in the project area. The proposed development would not substantially alter existing drainage patterns in the project area or surrounding area. Consistent with California Department of Housing and Community Development (HCD) standards, the first floor would be elevated 6 inches above the base flood elevation, which would reduce potential flood risks and minimize the likelihood of materials being released into floodwaters. The project would be required to comply with local regulations for stormwater management and drainage, which typically include measures to ensure that post-development runoff does not exceed pre-development levels.

Furthermore, as the project is not located within a regulatory floodway or a high-risk flood zone, it is unlikely to significantly impede or redirect flood flows in a manner that would cause substantial impacts to surrounding properties or the environment.

Therefore, the potential for the project to impede or redirect flood flows is less than significant.

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

Less Than Significant Impact

As discussed in Section 4.10.4c(iv), above, while the project area has a reduced flood risk compared to higher-risk zones, some flood hazard still exists. The project area is not located near an ocean or large body of water that could expose it to tsunami or seiche risks.

Given the project's location in Zone X, there is a low but not negligible risk of inundation during extreme flood events. In such a scenario, there is a potential for release of sediment and trash associated with the BHC. However, this risk is considered less than significant due to the low probability of such flooding and the nature of the facility. Per HCD standards, the first floor would be constructed 6 inches above the base flood elevation which will also reduce the potential for the release of materials into floodwaters. Therefore, the risk of release of pollutants due to inundation is less than significant.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact

The proposed project lies within the Butte Subbasin, which is managed under a comprehensive Groundwater Sustainability Plan developed collaboratively by 11 Groundwater Sustainability Agencies. As noted in Section 4.10.4a, the project would implement BMPs to protect water quality during construction and meet local, state, and federal standards, and no dewatering would be required during construction. The project would therefore not adversely affect beneficial uses of groundwater or contribute to an exceedance of water quality objectives established to protect beneficial uses, and impacts would be less than significant.

4.11 Land Use and Planning

4.11.1 Environmental Setting

The project area is designated Public in the 2030 General Plan and is locally zoned as P-Q-P Public Quasi Public. It is bordered by Haskell Street to the west and Sycamore Street to the north. Residential single-family homes are adjacent to the project area to the north, south, and west, and a commercial facility is adjacent to the east.

4.11.2 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Physically divide an established community?	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant Impact

4.11.3 Answers to CEQA Checklist Questions

a) Would the project physically divide an established community?

No Impact

The proposed project is surrounded by urban uses. The project would be constructed within the existing parcels and would not extend roadways into surrounding areas. The proposed project would not result in the physical division of any established community or neighborhood, nor would it include changes to the existing circulation network.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact

The site is locally zoned as Public Quasi Public with a General Plan designation of Public. A County behavioral health facility is consistent with a public designation. The project would comply with the City's land use plan, policies, and regulations adopted for the purpose of avoiding or mitigating environmental effects by implementing controls to protect or avoid impacts to sensitive resources and mitigating any impacts to less than significant levels, as described in the other sections of this IS.

Because the proposed project is a public use and would comply with the City land use plan, policies, and regulations, it would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

4.12 Mineral Resources

4.12.1 Environmental Setting

Minerals are naturally occurring chemical elements or compounds, or groups of elements and compounds, formed from inorganic processes and organic substances including, but not limited to, coal, peat, and oil-bearing rock, but excluding geothermal resources, natural gas, and petroleum.

Within the City, there are no mineral resources being mined or produced (City of Gridley 2009a).

According to the State Mining and Geology Board (California Department of Conservation 2020) there are no state or regionally valuable mineral resources within or adjacent to the project area.

4.12.2 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No Impact
b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	No Impact

4.12.3 Answers to CEQA Checklist Questions

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact

According to the State Mining and Geology Board and the General Plan (City of Gridley 2009a), there are no state or regionally valuable mineral resources within the project area. The proposed project would therefore not result in the loss of a known mineral resource.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact

According to the State Mining and Geology Board and General Plan, there are no resource recovery sites associated with the project; therefore, there would be no impact.

4.13 Noise

4.13.1 Environmental Setting

Noise is defined as a sound or series of sounds that are intrusive, objectional, or disruptive to daily life. Noise levels are measured to regulate ambient noise and protect residents of Gridley from exposure to excessive noise. The project area lies within a quiet residential and commercial neighborhood. The closest major noise source in the area is Highway 99, approximately 400 feet east of the site. The City's 2030 General Plan shows that ambient noise levels in the project area fall within the normally acceptable range (60 – 65 dBA) for exterior noise.

4.13.2 Regulatory Setting

Local

The Noise Element in the City of Gridley 2030 General Plan has set thresholds to minimize noise impacts on human activity to ensure health and safety within the community. The General Plan has established a threshold for acceptable exterior noise environments of 60 – 65 dBA for residential uses. Day-night average sound levels less than 70 dBA are considered acceptable for office buildings.

The City of Gridley Code of Ordinance requires any work to be completed during daylight hours, 7:00 a.m. to 6:00 p.m.

4.13.3 CEQA Checklist Summary

Would the project result in:

CEQA Question	Impact Determination
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less Than Significant Impact
b) Generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact

4.13.4 Answers to CEQA Checklist Questions

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact

Existing land uses in the general vicinity include commercial, residential, and transportation activities. The project would construct a new public facility and would not involve new construction for residential use, nor will it rehabilitate any existing residential building. The closest residence is adjacent to the project area.

During construction, workers and people residing in the area would be temporarily exposed to noise generated by construction equipment, such as compaction equipment, excavators, backhoes, and loaders. No pile driving, which is the primary source of ground borne vibrations and noise during construction, is proposed for construction. Construction noise would be temporary and would comply with the City construction noise guidelines.

Noise anticipated during project operations would be generated by mechanical equipment, such as heating, ventilation, and air conditioning systems, vehicle traffic on local roadways, and vehicle traffic in the proposed parking lots. These noise sources would be generally consistent with the ambient noise levels and attenuated at the closest sensitive receptors through new solid wood fencing. A solid wood fence would be constructed between all parking areas and abutting residential uses. Therefore, the project would have a less than significant impact on ambient noise levels.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact

Vibration is described in terms of frequency and amplitude. Unlike sound, there is no standard way of measuring and reporting vibration. Construction vibration is generally associated with pile driving and rock blasting. No pile driving or blasting is required for construction. Occasionally, large bulldozers and loaded trucks can cause perceptible vibration at close proximity. Construction activities for the 1-story building would result in intermittent exposure of ground borne vibration to the project area but is anticipated to be minimal. Vibration from the construction site would attenuate before reaching sensitive receptors and be temporary; therefore, the impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact

There are no airports in the vicinity of the project area. The closest airport to the project area is the Oroville Municipal Airport, approximately 7.95 miles away. Therefore, the project would not expose construction workers or residents to excessive aircraft noise.

4.14 Population and Housing

4.14.1 Environmental Setting

When the City of Gridley 2030 General Plan was written in 2009, the population was expected to increase from 7,241 to 9,000 by the year 2030 (City of Gridley 2009a). As of 2020, Gridley had an estimated population of 7,421 residents and an estimated housing stock of 2,579 dwelling units. From 2020 – 2023 the population decreased 2.0% annually (U.S. Census Bureau 2023).

4.14.2 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact

4.14.3 Answers to CEQA Checklist Questions

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

No Impact

The proposed project would employ up to 29 workers and is anticipated to receive up to 60 – 65 visitors every day. It would not construct any new residential structures and would only provide services to the existing community on a site zoned for public services. Population and business growth is below predictions for development under the current General Plan, and the additional jobs associated with the project would provide a benefit consistent with General Plan objectives. The proposed project would not induce substantial unplanned population growth in the City.

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

No Impact

The proposed project would not result in the displacement of people or housing and would therefore not require construction or replacement of housing elsewhere. Therefore, the project would have no impact.

4.15 Public Services

4.15.1 Environmental Setting

Fire Protection

The Gridley Fire Department provides 24-hour emergency response for medical emergencies, fire suppression, and disaster response. The Gridley Fire Department operates as a combination department, consisting of full-time career staff and a volunteer company. Full-time CAL FIRE firefighters work alongside Gridley area volunteer firefighters to provide comprehensive fire protection services to the community. The Gridley-Butte Fire Station 76 is located approximately 0.4 miles west of the project area.

Police Protection

The Gridley Police Department serves the project area. The Police Department includes 14 full-time sworn police officers, 6 sworn reserve police officers, 1 school resource officer, 1 department detective, 1 narcotics officer, 5 full-time public safety dispatchers, 1 records/dispatch supervisor, 1 community service officer, and 1 animal control officer (City of Gridley 2024). The nearest police station is located approximately 0.4 miles west of the project area.

Medical Facilities

Orchard Hospital is a certified hospital approximately 0.21 miles north of the project area. This facility includes an emergency room which is staffed 24 hours per day with physicians, nurses, and other healthcare professionals. There are no Trauma Centers located within the immediate area. The closest Trauma Center is Enloe Medical Center, which is an American College of Surgeons verified Level II Trauma Center. Enloe Medical Center is located approximately 27 miles north of the project area.

Schools

The proposed project is within the Gridley Unified School District. The nearest schools are Wilson Elementary School (0.1 miles southwest), Esperanza High School (0.2 miles northwest), and Grant Gridley High School (0.3 miles northeast). The Gridley School district has the capacity to expand existing facilities or develop new facilities as the population of Gridley increases (City of Gridley 2009b). The Gridley Unified School District provides bus transportation in the area.

Parks

The Gridley Recreation Services Department provides recreational services to the residents of Gridley. The department manages parks, trails, and other recreational facilities, including Manuel Vierra Park, Nick Daddow Park, and Gridley Rotary Park. Manuel Vierra Park, located 0.3 miles north of the project area, is the nearest public park.

4.15.2 CEQA Checklist Summary

Would the project result in:

CEQA Question	Impact Determination
a) Would the project result in substantial adverse physical impacts associated with the need and/or provision of new or physically altered governmental services and/or facilities in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services? i) Fire protection? ii) Police protection? iii) Schools? iv) Parks? v) Other public facilities?	Less Than Significant Impact

4.15.3 Answers to CEQA Checklist Questions

a) Would the project result in substantial adverse physical impacts associated with the need and/or provision of new or physically altered governmental services and/or facilities in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services?

i) Fire protection?

ii) Police protection?

iii) Schools?

iv) Parks?

v) Other public facilities?

Less Than Significant Impact

The proposed project would construct a behavioral health facility that is intended to reduce emergency response requirements by serving vulnerable populations within the existing community. The project does not involve new construction for residential use, demolition, or displacement, and would be constructed on an already developed site that does not contain residential uses. Because the project would not include residential development, no increase in population or use of public facilities other than the proposed BHC is expected and no impact is anticipated on schools, libraries, or parks within the area. Police, fire, and other emergency services would adequately serve the project area during construction and additional capacity would not be required once the project is completed.

4.16 Recreation

4.16.1 Environmental Setting

Parks and other recreation facilities in Gridley are under the jurisdiction of the Gridley Recreation Services Department. The Department manages several parks and trails including Manuel Vierra Park, Nick Daddow Park, and Gridley Rotary Park. The nearest public park is Manuel Vierra Park, located 0.3 miles north of the project area. While schools are not direct recreation providers, school facilities are also available for public use.

4.16.2 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No Impact
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No Impact

4.16.3 Answers to CEQA Checklist Questions

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact

The proposed project is a 1-story public service building and would not construct new residential structures that would result in an increased demand for park facilities. Therefore, the proposed project would not result in substantial physical deterioration of existing neighborhood and regional parks and recreational facilities.

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

No Impact

As discussed above, the project would not generate new demand to require the construction or expansion of other recreational facilities. Therefore, construction of the project would have no effect on the environment and existing recreational facilities.

4.17 Transportation

4.17.1 Environmental Setting

The proposed project would construct a new BHC near the southeast corner of Haskell and Sycamore Street.

Haskell Street is a 2-lane road that travels in a northwest to southwest direction along the entire west side of the proposed project. Haskell Street contains curb and gutter on both sides of the street and a sidewalk on the western side of the street. Haskell Street begins at Sage Street, approximately 1,202 feet northwest of the project area and extends all the way to a dead end approximately 2,620 feet from the project area.

Sycamore Street is a 2-lane road that travels in a west/east direction along the entire north side of the project area. Sycamore Street begins at Highway 99 approximately 700 feet east of the project area and extends to Ban Drive, approximately 1.3 miles west of the project area before turning into Colusa Highway. The majority of Sycamore Street is improved with curbs, sidewalks, and gutters on both sides of the street.

Transit Service

Regional transit service in Gridley is provided by B-Line, which is Butte County's regional public transit system. There is 1 major bus stop near the project area at Spruce Street and Highway 99. This stop is roughly 402 feet northeast of the project area along Spruce Street and is served by Transit Routes 30 and 32.

4.17.2 Regulatory Setting

Local and Regional Transportation

The following local and regional transportation guidance documents apply to the project:

- Butte County 2020 Regional Transportation Plan/Sustainable Communities Strategy for Butte County: Specifies policies, projects, and programs necessary over a 20+ year period to maintain, manage, and improve the region's transportation system.
- City of Gridley Circulation Element: Addresses the movement of people, goods, resources, and services in the Gridley Planning Area. This element establishes the City's service standards for transportation, discusses the degree to which the transportation network should be connected, and establishes policy for parking. In addition, the element supports goals and policies in other elements of the General Plan related to land use, public health and safety, community character and design, and local economy by reducing the reliance on cars for better air quality and reduced household transportation costs, assuring that essential goods and services are provided to Gridley residents, and supporting a growing local economy.

4.17.3 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less Than Significant Impact
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	Less Than Significant Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No Impact
d) Result in inadequate emergency access?	No Impact

4.17.4 Answers to CEQA Checklist Questions

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

Less Than Significant Impact

The proposed project would construct a new behavioral health facility and provide improvements on a developed infill site including transportation features to promote non-motorized transportation. The project would provide 4 bicycle parking spaces for visitors and workers.

The proposed project is approximately 0.25 miles from a bus stop that provides access to commercial and medical facilities throughout the region. The adjacent Haskell Street and Sycamore Street contain curbs, sidewalks, and gutters that can be used by cyclists and pedestrians. The proposed project would not change the roadways or multi-modal access in any way and therefore would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

b) Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less Than Significant Impact

CEQA Guidelines § 15064.3, subdivision (b) pertains to the use of “vehicle miles traveled (VMT)” to analyze transportation impacts. The Governor’s Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018) provides technical recommendations regarding the assessment of VMT, non-binding thresholds of significance, potential exemptions or presumptions of less than significant CEQA impacts, and mitigation measures.

Many factors affect travel behavior. These factors include density, diversity of land uses, design of the transportation network, access to regional destinations, distance to high-quality transit, development scale, demographics, and transportation demand management. Typically, low-density developments that are far from other land uses and with poor access to non-private vehicular modes of travel generate

more automobile travel than development located in urban areas with a higher density mix of land uses and a variety of travel. These low-density developments typically yield greater increases in VMT. Because the proposed project is in an urban area with multiple transportation options (public transportation, bicycle, and pedestrian facilities) and a mix of land uses, the project area would be expected to generate a lower VMT.

OPR (2018) recommends screening criteria to identify types, characteristics, or locations of projects that would not significantly impact VMT. If a project meets at least 1 of the following screening criteria, then it is presumed that VMT impacts would be less than significant for the project and a detailed VMT analysis is not required:

- Small Projects – Projects that would generate fewer than 110 vehicle trips per day.
- Map-Based Screening for Residential and Office Projects – Residential and office projects that locate in low-VMT areas.
- Proximity to Transit Stations – Projects within 0.5 miles of an existing major transit stop or a stop along a high-quality transit corridor.
- Affordable Residential Development – 100% affordable residential development (or the residential component of a mixed-use development) in infill locations.

This project is 0.25 miles from public transportation that can provide access to and from the project area to the City and region. Therefore, the proposed project is anticipated to have a less than significant impact on VMT.

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

No Impact

Vehicle access to the proposed project area would be via an unsignalized driveway located off Haskell Street. Pedestrian access would be via Sycamore Street. The proposed project would meet all City roadway access design requirements and would not introduce geometric design changes to area roadways or incompatible uses. Therefore, the proposed project would not increase hazards within the project vicinity.

d) Would the project result in inadequate emergency access?

No Impact

The proposed project would not alter existing emergency access routes or change existing patterns of emergency access around the project area, nor would construction require alteration or closures of public roads, which could inhibit access by emergency vehicles. The proposed project circulation design includes the use of existing local access roadways to all elements of the proposed project area and paved, graded access to all points within the development, which would facilitate emergency access in the event of an emergency at the site.

Furthermore, turning radii within the parking areas on-site would accommodate maneuverability of large emergency vehicles per code, including fire trucks and ambulances. Therefore, the project would have no impact on emergency access within the project area or vicinity.

4.18 Tribal Cultural Resources

4.18.1 Environmental Setting

The project area is within the ethnographic territory of the Konkow, located in the lower foothills of the Sierra Nevada and the Northern Sacramento Valley. The Konkow are a division of the Maidu; the Mountain Maidu, Konkow, and Nisenan are closely related and are often grouped together by ethnographers. The Konkow lived adjacent to the Mountain Maidu, along the Feather and Sacramento rivers, extending to the Sutter Buttes. Their territory included lower elevations of the Sierra Nevada and the valley floor.

Contact between the Maidu and Western culture began in 1808 with Spanish explorers and fur trappers. Despite new diseases, native cultures remained largely unchanged until the 1848 Gold Rush. Malaria in 1833, the Gold Rush, and subsequent massacres drastically reduced the population from 8,000 in 1846 to 900 by 1910 (City of Gridley 2022).

In 1855, treaties established reservation lands, relocating some Konkow to the Nome Lackee reservation in Tehama County. Today, Maidu and Konkow descendants have revitalized their heritage and are part of various rancherias and tribes, including those in Oroville, Chico, Susanville, and Plumas County (City of Gridley 2022).

4.18.2 Regulatory Setting

Native American Consultation

In accordance with AB 52, as identified in PRC § 21080.3.1(b)(2) of CEQA and Section 106 of the NHPA, Native American tribes identified by the Native American Heritage Commission (NAHC) must be invited to consult on projects.

4.18.3 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Less Than Significant Impact
i. Listed or eligible for listing in CRHR, or in a local register of historical resources as defined in PRC § 5020.1(k), or	
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC § 5024.1. In applying the criteria set forth in subdivision (c) of PRC § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Less Than Significant Impact with Mitigation Incorporated

4.18.4 Answers to CEQA Checklist Questions

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

i. Listed or eligible for listing in CRHR, or in a local register of historical resources as defined in PRC § 5020.1(k)?

Less Than Significant Impact

The County initiated Native American consultation on June 27, 2024, with a request to the NAHC for a tribal list and search of their Sacred Lands File. The file search was negative. There are currently no recorded tribal cultural resources (TCRs) eligible for listing in CRHR or a local register. Therefore, the project would result in a less than significant impact on a listed or known eligible for listing TCRs.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC § 5024.1. In applying the criteria set forth in subdivision (c) of PRC § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact with Mitigation Incorporated

The County initiated consultation with the tribes identified by the NAHC on August 21, 2024, with a letter and project maps. Mooretown Rancheria of Maidu Indians indicated there is a strong possibility of cultural material within the APE and requested to begin formal consultation. Follow-up phone calls were made on September 11, 2024. The County reached out to Mooretown Rancheria of Maidu Indians again on December 18, 2024, for consultation and has received no response to date. Whereas the tribe indicated there is a possibility for tribal cultural material on the site, there is indication that TCRs could be potentially damaged by construction activities. Therefore, Mitigation Measures TCR-1 and TCR-2 are required to ensure unanticipated discoveries will be handled appropriately during construction.

- **Mitigation Measure TCR-1:** Unanticipated Discoveries Mitigation Measure. This mitigation measure is intended to address the evaluation and treatment of inadvertent/unanticipated discoveries of potential TCRs, archaeological, or cultural resources during the project's ground disturbing activities. If any suspected TCRs are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. A Tribal Representative from Mooretown Rancheria of Maidu Indians shall be immediately notified and shall determine if the find is a TCR (PRC § 21074). The Tribal Representative will make recommendations for further evaluation and treatment as necessary.

When avoidance is infeasible, preservation in place is the preferred option for mitigation of TCRs, and every effort shall be made to preserve the resources in place, including through project redesign, if feasible. Culturally appropriate treatment may be, but is not limited to,

processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project area where they will not be subject to future impacts. Permanent curation of TCRs will not take place unless approved in writing by the tribe. The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a TCR may include Tribal Monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work at the discovery location cannot resume until all necessary investigation and evaluation of the discovery under the requirements of the CEQA, including AB 52, have been satisfied.

- **Mitigation Measure TCR-2:** Post Review Discoveries of Tribal Resources. The following measure is intended to address post review discoveries of TCRs that may be of religious and cultural significance.

Cultural items include isolated artifacts, darkened soil (midden), shell fragments, faunal bone fragments, fire affected rock and clay, bedrock mortars, bowl mortars, hand stones and pestles, flaked stone, and articulated, or disarticulated human remains. In general, tribes do not consider archaeological data recovery or curation of artifacts to be appropriate or respectful. The types of treatment preferred protects, preserves, or restores the integrity of a cultural resource and may include Tribal Monitoring, and recovery and reburial of cultural objects or cultural soil that is done with dignity and respect. Recommendations for the treatment of a cultural resource will be documented in the project record. For any recommendations made by the tribe that are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

If potentially significant cultural resources are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find. The Tribal Representative shall be contacted immediately to assess the significance and cultural value of the find and make recommendations for further evaluation and treatment, as necessary. A qualified cultural resources specialist (archaeologist) meeting the Secretary of Interior's Standards and Qualifications for Archaeology, may also assess the significance of the find in joint consultation with the Tribal Representative to ensure that tribal values are considered. Work shall remain suspended or slowed within 100 feet of the find until the resource is evaluated, which shall occur within 1 day, but no more than 2 days, of the find. The project applicant shall coordinate with the Tribal Representative any necessary investigation and evaluation of the discovery under the requirements of Section 106 of the NHPA. Preservation in place is the preferred alternative, and every effort must be made to preserve the resources in place, including through project redesign. The contractor shall implement any measures deemed by the lead agency to be necessary and feasible to preserve in place, avoid, or minimize significant effects to the resources, including the use of a paid Native American Monitor whenever work is occurring within 100 feet of the find. If adverse impacts to a cultural resource or unique archaeological resources occur, then consultation with Mooretown Rancheria of Maidu Indians regarding adverse effects shall occur, pursuant to 36 Code of Federal Regulations § 800.5, Assessing Adverse Effects, and § 800.6, Resolution of Adverse Effects.

4.19 Utilities and Service Systems

4.19.1 Environmental Setting

Water Supply

The City supplies domestic water from wells located throughout the City ranging in depth from 240 to 450 feet. The City treats this water with chlorine at the well site prior to its delivery to residents. The City's pumping system has a peak capacity of 6,280 gallons of water per minute (City of Gridley 2009b).

Stormwater Drainage

Both the City and Caltrans operate and maintain stormwater collection systems in the area. The City operates an underground stormwater collection system which serves areas east and west of Highway 99. Caltrans operates a collection of systems along Highway 99. These systems flow into ditches and sloughs which are maintained by Reclamation District No. 833, Reclamation District No. 2056, and Drainage District No. 1, and eventually drain into Butte Sink, the Sacramento River, Live Oak Slough, and the Feather River. The drainage system is subject to backup conditions south of Gridley and is affected by Sacramento River flood conditions and competing drainage flows (City of Gridley 2009a).

Wastewater Infrastructure

Wastewater infrastructure is operated and maintained by the City. The system consists of a network of underground collection pipes, a treatment plant, treatment ponds, percolation ponds, and emergency storage facilities. A system of gravity lines feeds to the main pipe south of the City, where it is pumped 5 miles to the east and under the Feather River to the wastewater treatment plant. The City of Gridley Wastewater Treatment Plant (WWTP) is permitted for an average dry weather flow of 1.7 million gallons per day (mgd) and currently receives 0.6 mgd (Bennett Engineering Services 2021).

Waste Removal

The Butte Regional Waste Management Authority manages waste collection and recycling services in Biggs and Gridley, and in unincorporated areas of Butte County. Solid waste from Gridley is primarily disposed of at the Neal Road Landfill approximately 19 miles north of the City. The Neal Road Landfill, which spans 190 acres, is owned and operated by the Butte County Public Works Department. The landfill has a maximum permitted capacity of approximately 25 million cubic yards, with an estimated remaining capacity of 21.7 million cubic yards as of July 2006 (City of Gridley 2009a). Based on current estimates, the Neal Road Landfill has an estimated 30 more years of operational life remaining (Butte County Public Works 2024).

Electrical Services

The City provides electrical services through its municipal electric utility, which is responsible for purchasing and distributing power, as well as maintaining the City's distribution and street lighting systems. Gridley is part of the Northern California Power Agency and the Western Area Power Administration, joint power agencies involved in the purchase, generation, transmission, and sale of wholesale electrical energy. The City's electric utility operates under federal oversight from the Federal

Energy Regulatory Commission and is subject to state energy regulations, including efficiency standards and reporting requirements to the California Energy Commission (City of Gridley 2009a).

4.19.2 CEQA Checklist Summary

Would the project:

CEQA Question	Impact Determination
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less Than Significant Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less Than Significant Impact
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less Than Significant Impact
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less Than Significant Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less Than Significant Impact

4.19.3 Answers to CEQA Checklist Questions

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact

Water

Water is already provided to the project area via existing connections on-site with lines to provide for irrigation, domestic water use, and fire emergencies. The system was designed to serve commercial and municipal uses on this site, thus the net increase in demand is anticipated to be low. The project would not require the construction or relocation of new water mains but would require connections to the existing main. The City has the capacity to provide water to the BHC without expanding current treatment facilities.

Stormwater Drainage

As discussed in Section 4.10.4, the proposed project would replace an existing lawn area with approximately 10,100 square feet (about 1/3 of an acre) of new building footprint, increasing impervious surface on the project area. Although impervious surface would increase, the City requires all new development to incorporate stormwater drainage and detention measures to ensure there is no

net increase in off-site runoff or flooding. Stormwater in the project vicinity is collected along Sycamore Street and conveyed through the City's drainage system to facilities maintained by Reclamation District No. 833, Reclamation District No. 2056, and Drainage District No. 1, which ultimately discharge to Butte Sink, the Sacramento River, Live Oak Slough, and the Feather River. Therefore, whereas the project must be designed in compliance with these standards, it would not result in an increase in flooding on- or off-site.

Wastewater

Restrooms would be provided for staff and visitors, which would increase demand on the City's wastewater treatment system. The City's wastewater treatment plant has the capacity to treat 1.7 mgd of wastewater. The City has concluded that the system is effective to treat the amount of wastewater generated by the current population and will accommodate population growth through General Plan buildout (Bennett Engineering Services 2021). The project area is within the planned development area of the General Plan, and the proposed project would result in only a small increase in wastewater generation at the project area compared to existing conditions. The building would connect to the City's existing sanitary sewer system. Therefore, the project would have a minimal impact on wastewater facilities.

Power

Electricity is managed by the City. The project area, which is fully developed, is located within an urban environment. The project is proposing solar to provide electricity for the facility. In addition, the infill nature of the project area supports access to existing power and telecommunication lines and services.

Conclusion

As an infill public services development, the project would result in a minor increase in demand for water and sewer capacity and would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, energy, or telecommunications facilities. Therefore, the proposed project would not result in the construction of new or expanded utility facilities and would have a less than significant impact.

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

Less Than Significant Impact

The project's water demand would be modest and would be served by the City of Gridley's municipal system. Under the 2030 General Plan, the City will prepare and update an Urban Water Management Plan when supply approaches 3,000 acre-feet annually, ensuring reliable service during normal, dry, and multiple dry years. The City also plans to consult with local irrigation districts and the Butte Water District to explore additional surface water and conjunctive use options if needed to serve General Plan buildout. Given these requirements and the project's modest demand and infill location, sufficient water supplies would be available to serve the project.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact

The proposed project would connect to the existing sewer lines that lead to the City's wastewater treatment plant. The project would not require the construction or relocation of new sewer mains, but only connections to the existing sewer main. The City of Gridley WWTP is permitted for an average dry weather flow of 1.7 mgd and currently receives 0.60 mgd (Bennett Engineering Services 2021). This capacity is sufficient for the current land uses with the addition of the BHC. In addition, the project would be required to comply with the requirements of the California Green Building Code including low-flow toilets and other water-efficient fixtures to achieve a 20% reduction in indoor water use over traditional fixtures. Therefore, the project would have a less than significant impact on the existing wastewater treatment system.

d) Would the project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact

Construction activities associated with the project may generate solid waste requiring disposal at area landfills. This waste would be generally limited to vegetation debris. Trenching and excavation spoils during construction would be screened and separated for use as backfill materials at the site of origin to the maximum extent possible. If hazardous soils are encountered during construction (see Section 4.9), these materials would be characterized and sent to the appropriate landfill.

It is anticipated that the proposed project, once constructed, would utilize solid waste collection services currently provided by the City to the project area. Additionally, the local landfill is not currently experiencing shortages in available capacity.

The proposed project would not generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals. The Neil Road facility has sufficient capacity, and the current expansion provides for an additional 30 years of capacity. The impact of the BHC on solid waste services would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact

Waste generation from construction would be temporary and would not reduce available capacities at existing landfills. Disposal of construction waste would comply with federal, state, and local statutes and regulations related to solid waste. Future waste from daily operation would be separated into waste, recyclables, and compost per state requirements; therefore, the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste and the impact would be less than significant.

4.20 Wildfire

4.20.1 Environmental Setting

The California Department of Forestry and Fire Protection (CAL FIRE) designates fire hazard severity zones for areas under state jurisdiction. For areas under local jurisdiction, CAL FIRE identifies areas that they consider to be Very High Fire Hazard Severity Zones (VHFHSZs). The local jurisdiction must choose whether to adopt the CAL FIRE recommendations.

The CAL FIRE Fire Hazard Severity Zones Viewer (CAL FIRE n.d.) was developed to guide construction standards for building permits, use of natural hazard disclosure at time of sale, defensible space clearance around buildings, property development standards, and considerations of fire hazard in County general and area plans. The 2024 Butte County Multi-Jurisdictional All Hazard Pre-Disaster Mitigation Plan Update adopted this plan in March of 2007 and the City of Gridley 2030 General Plan Safety Element cover safety concerns within the Gridley area. The project area is not located within a Wildfire Hazard Area (CAL FIRE n.d.). The Butte County Multi-Jurisdictional All Hazard Pre-Disaster Mitigation Plan indicates the project area is located within an area of low wildfire risk (Butte County 2024). In the City there is little to no wildland-urban interface, which results in lower wildfire risk (Butte County 2024). However, wildfire risk still exists from brush covered, non-cultivated land located within and surrounding the City (City of Gridley 2009a).

The project area currently consists of landscaping, a parking lot, and 2 buildings. The surrounding area is developed. Currently, water for firefighting is supplied to the site by a fire hydrant located adjacent to 168 Sycamore Street and across Sycamore Street from the project area. Vegetation existing on the site is minimal and consists of maintained lawn, trees, and some landscape vegetation.

4.20.2 Regulatory Setting

Title 24 Regulations

The Office of the State Fire Marshal (OSFM) is responsible for promulgating regulations that promote fire and life safety for inclusion into the State Building Codes including the California Building Code, California Fire Code, California Electrical Code, California Mechanical Code, California Plumbing Code and California Historical Building Code. These documents are also referred to as California Code of Regulations, Title 24. The process incorporates a great deal of public participation and is guided by the State Building Standards Law.

OSFM works with local government, fire officials, building officials, and the private sector to develop fire and life safety building standards addressing roof coverings, fire alarm systems, motion picture production facilities, hazardous materials, and organized camps. OSFM also regulates the adoption of building standards in assembly, institutional, educational, and residential buildings, as well as high-rises and any building containing State employees.

4.20.3 CEQA Checklist Summary

If located in or near state responsibility areas or lands classified as VHFHSZs:

CEQA Question	Impact Determination
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No Impact
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No Impact

4.20.4 Answers to CEQA Checklist Questions

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact

The project area is not located within a state responsibility area or on lands classified as a VHFHSZ. The City's adopted emergency plan includes prearranged emergency response procedures. Emergency routes for the evacuation of Gridley include Highway 99. The project would be constructed on developed parcels without any change to transportation facilities and would therefore have no impact on the existing adopted emergency response plans.

b) Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact

The proposed project would construct a public facility on developed infill parcels in a highly urbanized area. The site is not within or near a VHFHSZ, and there are no open lands or timber lands within 5 miles of the project area. The project area and surrounding area are fully developed, and there are no slopes or other factors at this site that would exacerbate wildfire risks.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact

The project is urban infill and would not require the installation or maintenance of fire suppression infrastructure to serve the new single story public building, which would be constructed to current Title 24 fire codes. Therefore, the project would not require new infrastructure or utilities that could exacerbate fire risk or fire related impacts on the environment.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact

The project area is in level terrain and highly urban, and not at risk of wildfires that could result in runoff, post-fire slope instability or drainage changes. The project therefore would not expose people or structures to significant risk, including downslope or downstream flooding or landslides, post-fire slope instability, or drainage changes.

4.21 Mandatory Findings of Significance

4.21.1 CEQA Checklist Summary

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

4.21.2 Answers to CEQA Mandatory Findings of Significance Questions

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact with Mitigation Incorporated

As discussed in Section 4.4, Biological Resources, project construction could impact protected migratory bird species during the breeding and nesting season; however, with implementation of Mitigation Measure BIO-1, impacts would be reduced to less than significant levels by requiring pre-construction surveys of the project area and establishing appropriate buffers around nests, should they be encountered.

As discussed in Section 4.9, Hazard and Hazardous Materials, project construction activities could expose construction workers to soil contaminants or release of contaminants. However, implementation of Mitigation Measures HAZ-1 and HAZ-2 would reduce potential exposure of construction workers to soil contaminants or release of contaminants through inappropriate disposal to less than significant by requiring the contractor to develop and implement a Health and Safety Plan for construction workers. Prior to any ground disturbing activities, the contractor would be required to document that workers are trained on the protocols and provide a copy of the final Health and Safety Plan on the job site.

As discussed in Section 4.18, Tribal Cultural Resources, project construction activities could potentially disturb TCRs. Mitigation Measures TCR-1 and TCR-2 are required to ensure unanticipated discoveries will be handled appropriately during construction.

No other potentially significant impacts to the environment, unique or rare species, habitats, or resources associated with the major periods of California history or prehistory were identified for the project.

b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, or the effects of probable future projects.)

Less Than Significant Impact with Mitigation Incorporated

The proposed project would not result in an exceedance for any criteria air pollutant for which the region is in non-attainment; therefore, there would be no cumulatively considerable net increase in criteria pollutants or greenhouse gases. The project would have a less than significant project impact on water quality and VMT, thus would not contribute to cumulatively considerable effects. As mitigated, the project would not contribute to a cumulative loss of tribal cultural or biological resources. Therefore, the project would not result in impacts that are individually limited but cumulatively considerable.

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

Less Than Significant Impact with Mitigation Incorporated

All potential impacts associated with construction and implementation of the project identified in this IS are either less than significant after mitigation or less than significant and do not require mitigation. Implementation of BMPs and compliance with state and federal regulations protecting human and environmental health during construction, such as preparation of a SWPPP and Spill Prevention Plan, and dust and toxic air contaminant emission controls, would be implemented as standard construction controls to protect water quality and air quality.

For Hazards and Hazardous Resources, the project could have adverse effects on human beings if hazardous materials are exposed during construction; however, with the implementation of Mitigation Measure HAZ-1, impacts would be reduced to less than significant levels by the implementation of a Health and Safety Plan to eliminate or reduce exposure to soils or groundwater where contamination is present.

During construction, excess soil generated as part of construction could contain hazardous material; however, implementation of Mitigation Measure HAZ-2 would ensure impacts would be reduced to less than significant by stockpiling and testing soils for contaminants prior to disposal to ensure appropriate disposal.

5 Mitigation Monitoring and Reporting Plan

CEQA requires review of any project that could have significant adverse effects on the environment. In 1988, CEQA was amended to require reporting on and monitoring of mitigation measures adopted as part of the environmental review process. This Mitigation Monitoring and Reporting Plan is designed to aid Butte County in their implementation and monitoring of measures proposed in the IS for the proposed project.

Table 3 provides details of the MMRP. The mitigation measures are taken from the IS and are assigned the same number as in the IS. The MMRP describes the actions that must take place to implement each mitigation measure, the timing of those actions, and the entities responsible for implementing and monitoring the actions.

Table 3. Mitigation and Monitoring Plan

Mitigation Measure	Mitigation Activities	Implemented By	Monitored By	Timing and Frequency	Verification of Compliance
BIO-1	The project will implement the following to protect nesting birds: If any construction activities (e.g., clearing, grubbing, or grading) are scheduled during the bird nesting season (typically defined by CDFW as February 1 to September 1), the approved construction contractor shall retain a qualified biologist to conduct a pre-construction survey of the project area, including a 100-foot buffer, as access is available, to locate active bird nests, identify measures to protect the nests, and locate any other special status species. Surveys shall be conducted in all potential habitat located at project work sites and in staging and storage areas. The pre-construction survey shall be conducted no more than 5 days prior to the implementation of construction activities (including staging and equipment storage). No active bird nest shall be disturbed unless a qualified biologist determines that the proposed activity will not adversely affect the nesting birds. If avoidance is not feasible, construction activities shall be conducted under the monitoring and direction of a qualified biologist until the young have fledged and the nest is no longer active The Qualified Biologist shall observe any identified active nests prior to the start of any construction-related activities to establish a behavioral baseline of the adults and any nestlings. Once work commences, all active nests should be continuously monitored by the Qualified Biologist to detect any signs of disturbance and behavioral changes as a result of the project. In addition to direct impacts, such as nest destruction, nesting birds might be affected by noise, vibration, odors, and movement of workers or equipment. If signs of disturbance and behavioral changes are observed, the biological personnel responsible shall cease work causing that change and shall contact the CDFW for guidance.	Contractors	Butte County	Throughout construction	Verified by: Date:

Mitigation Monitoring and Reporting Plan

HAZ-1	The contractor shall develop and implement a Health and Safety Plan for construction workers. The protocols will specify how to eliminate or reduce exposure to soils where contamination may be present. Prior to any ground-disturbing activities, the contractor would be required to document that workers are trained on the protocols and provide a copy of the final Health and Safety Plan on the job site.	Contractors	Butte County	Throughout construction	Verified by: Date:
HAZ-2	All excess soil generated as part of construction and renovation to the project area should be stockpiled and profiled for disposal according to the requirements of the selected landfill.	Contractor	Butte County	Throughout construction	Verified by: Date:
TCR-1	This mitigation measure is intended to address the evaluation and treatment of inadvertent/ unanticipated discoveries of potential tribal cultural resources (TCRs), archaeological, or cultural resources during a the project’s ground disturbing activities. If any suspected TCRs are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. A Tribal Representative from a California Native American tribe Tribe (Tribe) that is traditionally and culturally affiliated with a geographic area shall be immediately notified and shall determine if the find is a TCR (PRC § 21074). The Tribal Representative will make recommendations for further evaluation and treatment as necessary. When avoidance is infeasible, preservation in place is the preferred option for mitigation of TCRs, and every effort shall be made to preserve the resources in place, including through project redesign, if feasible. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project area where they will not be subject to future impacts. Permanent curation of TCRs will not take place unless approved in writing by the Tribe. The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and	Contractors	Butte County	Throughout construction	Verified by: Date

Mitigation Monitoring and Reporting Plan

	feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a TCR may include Tribal Monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work at the discovery location cannot resume until all necessary investigation and evaluation of the discovery under the requirements of the CEQA, including AB52, have been satisfied.				
TCR-2	The following measure is intended to address post review discoveries of cultural resources that may be of religious and cultural significance to the California Native American Tribe that is traditionally and culturally affiliated with the project areaTribe (Tribe). Cultural items include isolated artifacts, darkened soil (midden), shell fragments, faunal bone fragments, fire affected rock and clay, bedrock mortars, bowl mortars, hand stones and pestles, flaked stone, and articulated, or disarticulated human remains. In general, tribes do not consider archaeological data recovery or curation of artifacts to be appropriate or respectful. The types of treatment preferred protects, preserves, or restores the integrity of a cultural resource and may include Tribal Monitoring, and recovery and reburial of cultural objects or cultural soil that is done with dignity and respect. Recommendations for the treatment of a cultural resource will be documented in the project record. For any recommendations made by the Tribe that are not implemented, a justification for why the recommendation was not followed will be provided in the project record. If potentially significant cultural resources are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find. A Native AmericanThe Tribal Representative from the Tribe shall be contacted immediately to assess the significance and cultural value of the find and make recommendations for further evaluation and treatment, as	Contractors	Butte County	Throughout construction	Verified by: Date:

Mitigation Monitoring and Reporting Plan

	necessary. A qualified cultural resources specialist (archaeologist) meeting the Secretary of Interior’s Standards and Qualifications for Archaeology, may also assess the significance of the find in joint consultation with the Native American Tribal Representatives to ensure that Tribal values are considered. Work shall remain suspended or slowed within 100 feet of the find until the resource is evaluated, which shall occur within one day, but no more than two days, of the find. The project applicant shall coordinate with a the Tribal Representative any necessary investigation and evaluation of the discovery under the requirements of Section 106 of the National Historic Preservation Act. Preservation in place is the preferred alternative, and every effort must be made to preserve the resources in place, including through project redesign. The contractor shall implement any measures deemed by the lead agency to be necessary and feasible to preserve in place, avoid, or minimize significant effects to the resources, including the use of a paid Native American Monitor whenever work is occurring within 100 feet of the find. If adverse impacts to a cultural resource or unique archeological resources occur, then consultation with a traditionally and culturally affiliated Native American Tribe regarding adverse effects shall occur, pursuant to 36 Code of Federal Regulations §800.5, Assessing Adverse Effects, and § 800.6, Resolution of Adverse Effects.				
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6 References

- Bennett Engineering Services. 2021. "Memorandum: Wastewater Treatment Plant Capacity Analysis."
- Butte County. 2019. *Local Hazard Mitigation Plan – Executive Summary*. October 2019.
<https://www.buttecounty.net/DocumentCenter/View/3930/2019-Local-Hazard-Mitigation-Plan---Executive-Summary-PDF>.
- Butte County. 2021. *2021 Climate Action Plan*. <https://www.buttecounty.net/344/Climate-Action-Plan>.
- Butte County. 2024. *Local Hazard Mitigation Plan Update*. <https://www.buttecounty.net/808/Local-Hazard-Mitigation-Plan>.
- Butte County Air Quality Management District (BCAQMD). 2024. *CEQA Air Quality Handbook*.
<https://bcaqmdca.specialdistrict.org/files/583f235c2/CEQA-Handbook-2024-Update-Final.pdf>.
- Butte County Association of Governments (BCAG). 2020. *Regional Transportation Plan/Sustainable Communities Strategy for Butte County*.
<https://www.bcag.org/documents/planning/RTP%20SCS/2020%20RTP%20SCS/Document%20Chapters/00%202020%20RTP%20SCS%20Executive%20Summary.pdf>.
- Butte Countywide Homeless Continuum of Care. 2019. *2019 Point-in-Time Homeless Count & Survey: Comprehensive Report*.
https://www.buttecoc.org/uploads/4/9/7/3/49737995/butte_2019_pit_report.pdf.
- Butte Countywide Homeless Continuum of Care. 2025. *2025 Point-in-Time Homeless Executive Summary*.
https://www.buttehomelesscoc.com/uploads/1/1/7/5/117500423/2025_pit_executive_summary.pdf.
- Butte County Public Works. 2024. *Neal Road Recycling and Waste Facility Master Plan*.
https://buttecounty.granicus.com/MetaViewer.php?view_id=2&meta_id=204895.
- California Air Pollution Control Officers Association. 2021. *California Emissions Estimator Model (CalEEMod)*. Version 2020.4.0. caleemod.com.
- California Air Resources Board (CARB). 2022. *2022 Scoping Plan for Achieving Carbon Neutrality*.
<https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp.pdf>.
- California Department of Conservation. 2016. "California Important Farmland Finder."
<https://maps.conservation.ca.gov/DLRP/CIFF/>.
- California Department of Conservation, State Mining and Geology Board. 2020. *2020 Annual Report*.
https://www.conservation.ca.gov/smgf/Documents/2020%20Annual%20Report_ADA.pdf.
- California Department of Forestry and Fire Protection (CAL FIRE). n.d. "Watershed Mapper." Accessed June 24, 2025. https://egis.fire.ca.gov/Watershed_Mapper/.
- California Department of Forestry and Fire Protection. n.d. "Fire Hazard Severity Zones in State Responsibility Area." ArcGIS Online map. Accessed June 25, 2025. <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>.
- California Natural Resources Agency. (2018). *Title 14, Division 6: Guidelines for the Implementation of the California Environmental Quality Act* (Final Text, December 28, 2018). Available at:
https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf (resources.ca.gov).
- California State Water Resources Control Board (SWRCB). n.d. "GeoTracker". Accessed April 25, 2025.
<https://geotracker.waterboards.ca.gov/>.
- Caltrans. 2024. "Scenic Highways." <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.
- Central Valley Regional Water Quality Control Board (Central Valley RWQCB). 2018. "Basin Plans." In "Basin Planning." California Water Boards.
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/.
- City of Gridley. 2009a. *2030 General Plan*. Gridley, CA: City of Gridley. <http://gridley.ca.us/documents-forms/>.
- City of Gridley. 2009b. *Draft and Final Environmental Impact Report for the City of Gridley 2030 General Plan*.
<http://gridley.ca.us/documents-forms/>.

References

- City of Gridley. 2020. "City of Gridley Zoning Map."
[http://gridley.ca.us/public/uploads/pdfs/Gridley_zoning_34x44_Aug_2020_\(002\).pdf](http://gridley.ca.us/public/uploads/pdfs/Gridley_zoning_34x44_Aug_2020_(002).pdf).
- City of Gridley. 2022. *Initial Study and Mitigated Negative Declaration Gridley Feather River Sewer Crossing Project*. <https://files.ceqanet.opr.ca.gov/281670-1/attachment/dJPaUKz2Ci8b2BogDSjT4UbElWVcYi0Z6gqvdkA5o0YNKbzQ6-7qnkT5cn52I5Bw2kyx4I7hfBJlwGah0>.
- City of Gridley. 2024. "Gridley Police Department." <http://gridley.ca.us/government-and-departments/departments/police-department>.
- Department of Toxic Substances Control. n.d. "Your EnviroStor." California Environmental Protection Agency. Accessed June 25, 2025. <https://dtsc.ca.gov/your-envirostor/>.
- Department of Water Resources. n.d. "Sustainable Groundwater Management Act (SGMA) Portal." Accessed August 22, 2024. <https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#gwlevels>.
- Forensic Analytics Consulting Services. 2024. *Asbestos and Lead Survey Report*. Prepared for NCE.
- International Society for Traumatic Stress Studies. 2024. "Traumatic Stress and Substance Abuse Problems." <https://www.samhsa.gov/resource/dbhis/international-society-traumatic-stress-studies>.
- Natural Resources Conservation Service, United States Department of Agriculture (NRCS). 2024. "Web Soil Survey." <http://websoilsurvey.sc.egov.usda.gov/>.
- NCE. 2024a. *Biological Resources Reconnaissance Survey Technical Letter Report, Gridley Veterans Memorial Building Facility Project*. Prepared for Butte County.
- NCE. 2024b. *Cultural Resource Inventory Report, Gridley Behavioral Health Services Facility*. Prepared for Butte County.
- NCE. 2025a. *Final Phase I Environmental Site Assessment, Gridley Behavioral Health Center*. Prepared for Butte County.
- NCE. 2025b. *Draft Phase II Environmental Site Assessment, Gridley Behavioral Health Center*. Prepared for Butte County.
- Office of Planning and Research (OPR). 2018. *Technical Advisory on Evaluation Transportation Impacts in CEQA*. https://lci.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
- Rosenthal, A., Stover, E., & Haar, R. J. (2021). "Health and social impacts of California wildfires and the deficiencies in current recovery resources: An exploratory qualitative study of systems-level issues." *PLoS ONE*, 16(3), e0248617. <https://doi.org/10.1371/journal.pone.0248617> (journals.plos.org) Page 1.
- United States Census Bureau. 2023. "City of Gridley – Census Bureau Profile". https://data.census.gov/profile/Gridley_city,_California?g=160XX00US0631260#housing.
- U.S. Fish and Wildlife Service (USFWS). n.d. "Information for Planning and Consultation (IPaC)." Accessed August 22, 2024. <https://ecos.fws.gov/ipac/>.
- U.S. Fish and Wildlife Service (USFWS). 2024. "National Wetlands Inventory Mapper." <https://www.fws.gov/wetlands/data/Mapper.html>.

Appendix A

CalEEMod Results

Gridley Social Services Bldg Summary Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Gridley Social Services Bldg
Construction Start Date	9/1/2025
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.90
Precipitation (days)	12.0
Location	39.3646843871262, -121.69024819087724
County	Butte
City	Gridley
Air District	Butte County AQMD
Air Basin	Sacramento Valley
TAZ	225
EDFZ	3
Electric Utility	Gridley Electric Utility
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.26

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Government Office Building	14.0	1000sqft	0.32	14,000	500	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling
Construction	C-5	Use Advanced Engine Tiers
Construction	C-8	Use Renewable Diesel
Construction	C-10-A	Water Exposed Surfaces

* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	PM10T	PM2.5T
Daily, Summer (Max)	—	—	—	—
Unmit.	1.13	10.1	5.83	3.01
Mit.	1.13	10.1	2.59	1.44
% Reduced	—	—	56%	52%
Daily, Winter (Max)	—	—	—	—
Unmit.	13.1	5.22	0.31	0.21
Mit.	13.1	5.22	0.31	0.21
% Reduced	—	—	—	—
Average Daily (Max)	—	—	—	—
Unmit.	0.23	1.11	0.09	0.06
Mit.	0.23	1.11	0.07	0.05
% Reduced	—	—	22%	15%
Annual (Max)	—	—	—	—
Unmit.	0.04	0.20	0.02	0.01
Mit.	0.04	0.20	0.01	0.01

% Reduced	—	—	22%	15%
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2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	PM10T	PM2.5T
Daily, Summer (Max)	—	—	—	—
Unmit.	2.28	2.07	2.50	0.67
Daily, Winter (Max)	—	—	—	—
Unmit.	1.95	2.39	2.50	0.67
Average Daily (Max)	—	—	—	—
Unmit.	1.55	1.65	1.77	0.48
Annual (Max)	—	—	—	—
Unmit.	0.28	0.30	0.32	0.09

6. Climate Risk Detailed Report

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	5	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	5	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

7. Health and Equity Details

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	62.0
Healthy Places Index Score for Project Location (b)	29.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes

Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No
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a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

Appendix B

Biological Resource Technical Memorandum



Collaboration. Commitment. Confidence.SM

July 22, 2024

Shawn Rohrbacker
Project Manager
Butte County General Services
25 County Center Drive, Suite 213
Oroville, CA 95965

**RE: Gridley Veterans Memorial Building Facility Project
 Biological Resources Reconnaissance Survey Technical Letter Report**

Introduction

This biological resources reconnaissance survey technical letter report for the Gridley Services Facility Project (Project) presents the results of background research and a reconnaissance-level field survey for special-status species (SSS) and their habitat. NCE conducted background research and a field survey to document and describe the existing biological and botanical resources observed on the Project site, performed a presence/absence survey for potential SSS on site, and documented and described habitat observed within and adjacent to the Project site. A wide variety of taxa native to the state of California have low population numbers, limited distributions, or are otherwise vulnerable to extinction or extirpation within the state and are therefore protected by state and federal laws. Although they may include ecologically significant units, species, and/or sub-species, these taxa are collectively referred to as SSS in this report.

Project Location and Description

The Project is located at 267 Sycamore Street in the Town of Gridley (Town) in Butte County, California, within the Gridley United States Geological Survey (USGS) 7.5-minute quadrangle map (Attachment A, Figure 1). The Project site is located within four (4) parcels (APN numbers 010-170-001, 010-170-019, 010-170-003, and 010-170-020) totaling approximately 2.62-acres (Attachment A, Figure 2).

The project could involve new construction on up to 2.62 acres, including parking lots, 2 buildings, landscape, lighting, and street frontage improvements. The Project proposes to construct a 10,000-14,000 square foot building and improve the parking lot on the county owned parcels.

1003 W. Cutting Blvd., Suite 110
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Relevant Regulations

Federal

Federal Endangered Species Act (ESA)

The Federal Endangered Species Act (ESA) protects plants and wildlife that are listed as endangered or threatened by the U.S. Fish and Wildlife Service (USFWS).

Section 9 of the ESA prohibits the taking of endangered wildlife, where taking is defined as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct” (50 Code of Federal Regulations 17.3). This statute also governs removing, possessing, maliciously damaging, or destroying any endangered plant on federal land and removing, cutting, digging up, damaging, or destroying any endangered plant on non-federal land in knowing violation of state law.

Section 7 of the ESA requires federal agencies to consult with the USFWS or National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA), as applicable, if their actions could adversely affect an endangered plant or wildlife species or its critical habitat.

Migratory Bird Treaty Act (MBTA)

The Migratory Bird Treaty Act (MBTA) makes it unlawful to at any time, by any means or in any manner pursue, hunt, take, capture, or kill migratory birds. The law also applies to the removal of nests occupied by migratory birds during the breeding season. The list of bird species protected under the MBTA, which includes raptors, can be found in the Code of Federal Regulations (CFR) Title 50, Part 10.13.

National Environmental Policy Act (NEPA)

NEPA requires that federal agencies consider potential environmental consequences of proposed actions in their decision-making process. The law’s intent is to protect, restore, or enhance the environment through well-informed federal decisions. The Council on Environmental Quality (CEQ) was established under NEPA for the purpose of implementing and overseeing federal policies as they relate to this process. In 1978, the CEQ issued Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 Code of Federal Regulations [CFR] §1500-1508[CEQ, 1978]). These regulations specify that an EA be prepared to:

- Briefly provide sufficient analysis and evidence for determining whether or not to prepare an Environmental Impact Statement or a Finding of No Significant Impact;
- Aid in the agency’s compliance with NEPA when an Environmental Impact Statement is deemed unnecessary; and
- Facilitate Environmental Impact Statement preparation when one is necessary.

State

California Endangered Species Act (CESA)

California Endangered Species Act (CESA) prohibits the “taking” of state-listed endangered or threatened species, as well as species being considered for listing (candidate species). Under CESA, “take” is defined as an activity that would directly or indirectly kill an individual of a species. Pursuant to CESA, an Incidental Take Permit from the California Department of Fish and Wildlife (CDFW) is required for projects that could result in the “take” of a state listed threatened or endangered species.

California Environmental Quality Act (CEQA)

CEQA requires that significant environmental impacts of proposed projects be reduced to a less-than-significant level through adoption of feasible avoidance, minimization, or mitigation measures unless overriding considerations are identified and documented that make the mitigation measures or alternatives infeasible. CEQA applies to certain activities in California undertaken by either a public agency or a private entity that must receive some discretionary approval from a California government agency.

Threatened and Endangered Species

Permits may be required from both the CDFW if activities associated with a proposed Project will result in the “take” of a listed species. “Take” is defined by the state of California as “to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill” (California Fish and Game Code, Section 86). “Take” is more broadly defined by the federal Endangered Species Act to include “harm” (16 USC, Section 1532(19), 50 CFR, Section 17.3). Both agencies review CEQA documents to determine the adequacy of their treatment of endangered species issues and to make Project-specific recommendations for their conservation.

Birds of Prey and Nesting Birds

Nesting birds are protected in California under State Fish and Game Code in Section 3503. Section 3503 states, “It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” Nesting migratory birds are also federally protected under the Migratory Bird Treaty Act (MBTA) (50 CFR Part 10 and Part 21) which protects migratory birds, their occupied nests, and their eggs from disturbance and/or destruction.

Birds of prey are protected in California under provisions of the State Fish and Game Code, Section 3503.5, which states that it is “unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.” Construction disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “taking” by the CDFW.

California Native Plant Protection Act

The Native Plant Protection Act (NPPA) of 1977 (California Fish and Game Code Sections 1900-1913) was created to “preserve, protect and enhance rare and endangered plants in this State.” The NPPA is administered by CDFW. The Fish and Wildlife Commission has the authority to designate native plants as “endangered” or “rare” and to protect endangered and rare plants from take. CESA provided further protection for rare and endangered plant species, but the NPPA remains part of the CDFG Code. No species protected by the California NPPA have been identified in the Project area.

Local

Town of Gridley 2023 General Plan

Community Character and Design Element

- Following adoption of the 2030 General Plan, the city will adopt a tree preservation ordinance. This ordinance can provide regulatory guidance on what types of trees can be removed and what permits are required in order to remove different types of trees. The ordinance will provide guidance on tree

replacement requirements. Tree replacement requirements will be proportional to the number and/or size of trees removed. The ordinance can provide guidance on several General Plan policy topics, including but not limited to aesthetic benefits, biological benefits, and cultural/historic significance of trees.

Methods

Database research and literature reviews were conducted in support of the determinations outlined in this report. Information requests for biological resources known to occur in the vicinity of the Project site were also made. The following preliminary database searches for biological resources within the Project site were conducted:

- CDFW California Natural Diversity Database (CNDDB) (CDFW 2024)
- CNPS Inventory of Rare and Endangered Vascular Plants of California (CNPS 2024)
- USFWS Information for Planning and Consultation (IPaC) (USFWS 2024)

NCE Staff Biologists Ruby Rodriguez and Katherine Outhwaite conducted a reconnaissance-level field survey within the Project site on July 12, 2024, to verify the accuracy of the preliminary research and to identify SSS that may occur within the Project site based on their habitat requirements and the existing site conditions. The survey involved walking parallel and meandering transects within the Project site ensuring 100% coverage for potential rare plants, observing and recording plant communities and wildlife (including tracks and signs), evaluating habitats for SSS, and determining the rarity and listing status of existing plants. All live trees with diameter-at-breast-height (DBH) greater than four (4) inches were assessed, and tree species, size, and location were documented.

The July 12, 2024, survey lasted approximately 1.5 hours and started at 8:30 a.m. Skies were clear and the temperature ranged from 85°F – 96°F with winds at 0 miles per hour. Survey equipment included binoculars, camera, measuring tape, 10X magnification hand lens, and smartphone using the ESRI Field Maps application.

Result

No SSS were observed within or adjacent to the Project site during the July 12, 2024, reconnaissance-level field survey. The Project site is primarily characterized by developed land, including a veterans memorial building and The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Facility in a previous courthouse building. The southern portion of the site contains an area of annual grassland dominated by non-native grasses and shrubs, and small patches dominated by Ponderosa pine (*Pinus ponderosa*). The surrounding area is characterized by developed land, including roadways, structures, houses and largely cleared lots with rubble and debris. No stream or wetland indicators or plant species indicative of these types of features were observed within the project site, and no water flow was present despite recent heavy rains. Therefore, the feature is not considered a jurisdictional aquatic resource under USACE, RWQCB, and CDFW regulatory definitions. Traffic noise, nearby construction, human activity, lack of contiguous open space, and degraded habitat make for a low-quality site for most native plants and animals.

USFWS IPaC identified the following seven (7) SSS as potential species of concern for the Project site:

- Giant garter snake (*Thamnophis gigas*)
- Northwestern pond turtle (*Actinemys marmorata*)
- Western spadefoot (*Spea hammondi*)

- Monarch butterfly (*Danaus plexippus*)
- Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)
- Vernal pool fairy shrimp (*Branchinecta lynchi*)
- Vernal pool tadpole shrimp (*Lepidurus packardii*)

The Project site also does not contain wetland or vernal pool habitat, or other ponded aquatic features that giant garter snake, northwestern pond turtle, western spadefoot, vernal pool fairy shrimp, and vernal pool tadpole shrimp require. The Project site does not contain milkweed species required as a food source by monarch butterflies, and lacks any elderberry shrubs, the required food source and habitat for valley elderberry longhorn beetle. Additionally, due to the disturbed and developed nature of the habitat within and surrounding the Project site, these seven (7) SSS are not anticipated to occur within the Project site during construction. Impacts to these species are not anticipated, and no mitigation measures are proposed.

Trees within the Project site provide potential nesting habitat for migratory bird and raptor species. However, no bird nests were observed within the Project site during the July 12, 2024, survey. Many avian species have adapted to human presence and can coexist successfully with human development. Protective mitigation measures for avian species are discussed in the next section.

The survey documented 31 trees on the site with a DBH greater than 4 inches. A complete list of plant and wildlife species observed during the survey is recorded in **Tables 1-2** below.

Table 1. Plant Species Observed During Survey

Scientific Name	Common Name	Native (Y/N)
<i>Carya illinoensis</i>	Hardy pecan	N
<i>Cupressus lusitanica</i>	Mexican Cypress	N
<i>Ligustrum lucidum</i>	Glossy privet	N
<i>Morus alba</i>	White mulberry	N
<i>Paulownia tomentosa</i>	Empress tree	N
<i>Pinus ponderosa</i>	Ponderosa pine	Y
<i>Pistacia lentiscus</i>	Mastic	N
<i>Platanus occidentalis</i>	American sycamore	N
<i>Prunus cerasifera</i>	Cherry plum	N
<i>Quercus lobata</i>	Valley oak	Y

Scientific Name	Common Name	Native (Y/N)
<i>Stellaria media</i>	Common chickweed	N
<i>Taraxacum erythrospermum</i>	Red-seeded dandelion	N
<i>Triadica sebifera</i>	Chinese tallow tree	N
<i>Viscum album</i>	Mistletoe	N

Table 2. Wildlife Species Observed During Survey

Scientific Name	Common Name	Native (Y/N)
<i>Baeolophus inornatus</i>	Oak titmouse	Y
<i>Haemorhous mexicanus</i>	House finch	Y
<i>Melanerpes formicivorus</i>	Acorn woodpecker	Y

Discussion and Recommendations

No SSS were observed during the July 12, 2024, reconnaissance-level field survey. Based on database research, a reconnaissance-level field survey, and habitat observations, it is unlikely that SSS would occur within the Project site during construction. The Project is not expected to have any adverse impacts on SSS.

Trees within and adjacent to the Project site provide potential nesting habitat for migratory birds and raptors. Construction activities that adversely affect the nesting success of any migratory birds and tree-nesting raptors or result in mortality of individual birds constitute a violation of the Federal Migratory Bird Treaty Act (16 U.S.C., scc. 703, Supp. I, 1989) which prohibit killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior. If a migratory bird or raptor, regardless of its federal or state status, were to nest in trees on or near the site prior to or during proposed construction activities, such activities could result in the abandonment of active nests or direct mortality to these birds.

Below are two construction requirements to ensure that no impacts on nesting avian species will occur during project construction:

- **Standard CDFW Requirement #1:** If Project work must occur during the nesting season (February 1 – September 1), the County shall utilize a qualified biologist to survey nesting birds within the project area, no more than 14 days prior to the beginning of tree and vegetation removal or ground disturbing activities. A copy of the survey report shall be submitted to the County prior to the start of construction activities.
- **Standard CDFW Requirement #2:** If nesting birds are detected within the project area during the survey, consultation with CDFW and USFWS is recommended to establish acceptable avoidance or minimization measures to avoid impacts to migratory birds and raptors. Avoidance measures could include the establishment of a suitable activity-free buffer around active nests/roosting sites. The size of the buffer, duration of buffer,

acceptable activities, and other details will be established through consultation with the CDFW and USFWS. The avoidance or minimization plan shall be submitted to the County, CDFW, and USFWS for review and approval prior to the start of construction activities. These measures will ensure that no nesting birds are impacted by construction activities.

General Construction Measures

NCE recommends the following general construction measures be implemented by the County to protect wildlife species and habitats:

- The use or storage of petroleum-powered equipment shall be accomplished in a manner to prevent the potential release of petroleum materials into adjacent habitat areas, including waters of the State and U.S.
- Areas for fuel storage, refueling and servicing of construction equipment must be located in an upland location outside of sensitive habitat.
- Wash sites must be located in upland locations to ensure wash water does not flow into stream channels or wetlands.
- All construction equipment must be in good working condition, showing no signs of fuel or oil leaks. All questionable motor oil, coolant, transmission fluid, and hydraulic fluid hoses, fittings and seals shall be replaced. The mechanical equipment shall be inspected on a daily basis to ensure no leaks. All leaks shall be repaired in the equipment staging area or other suitable location prior to resumption of construction activity.
- Oil absorbent and spill containment materials shall be located on site when mechanical equipment is in operation within 100 feet of a waterway. If a spill occurs, no additional work shall occur until, 1) the mechanical equipment is inspected by the contractor and the leak has been repaired, 2) the spill has been contained, and 3) the appropriate regulatory agencies have been contacted and they have evaluated the impacts of the spill.
- To avoid debris contamination into drainages and other sensitive wildlife habitats, silt fence or other sediment control devices will be placed around construction sites in these areas to contain spoils from construction excavation activities.
- Project site boundaries shall be clearly delineated by stakes and /or flagging to minimize inadvertent degradation or loss of adjacent habitat areas during project operations. Staff and/or its contractors shall post signs and/or place fence around the project site to restrict access of vehicles and equipment unrelated to project operations.

Should you have any questions, please don't hesitate to contact Cord Hute via email at chute@ncenet.com, or Ruby Rodriguez via email at rrodriguez@ncenet.com.

Prepared by:



Cord Hute
Senior Scientist



Ruby Rodriguez
Staff Biologist

NCE

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(510) 215-3620

Attachments:

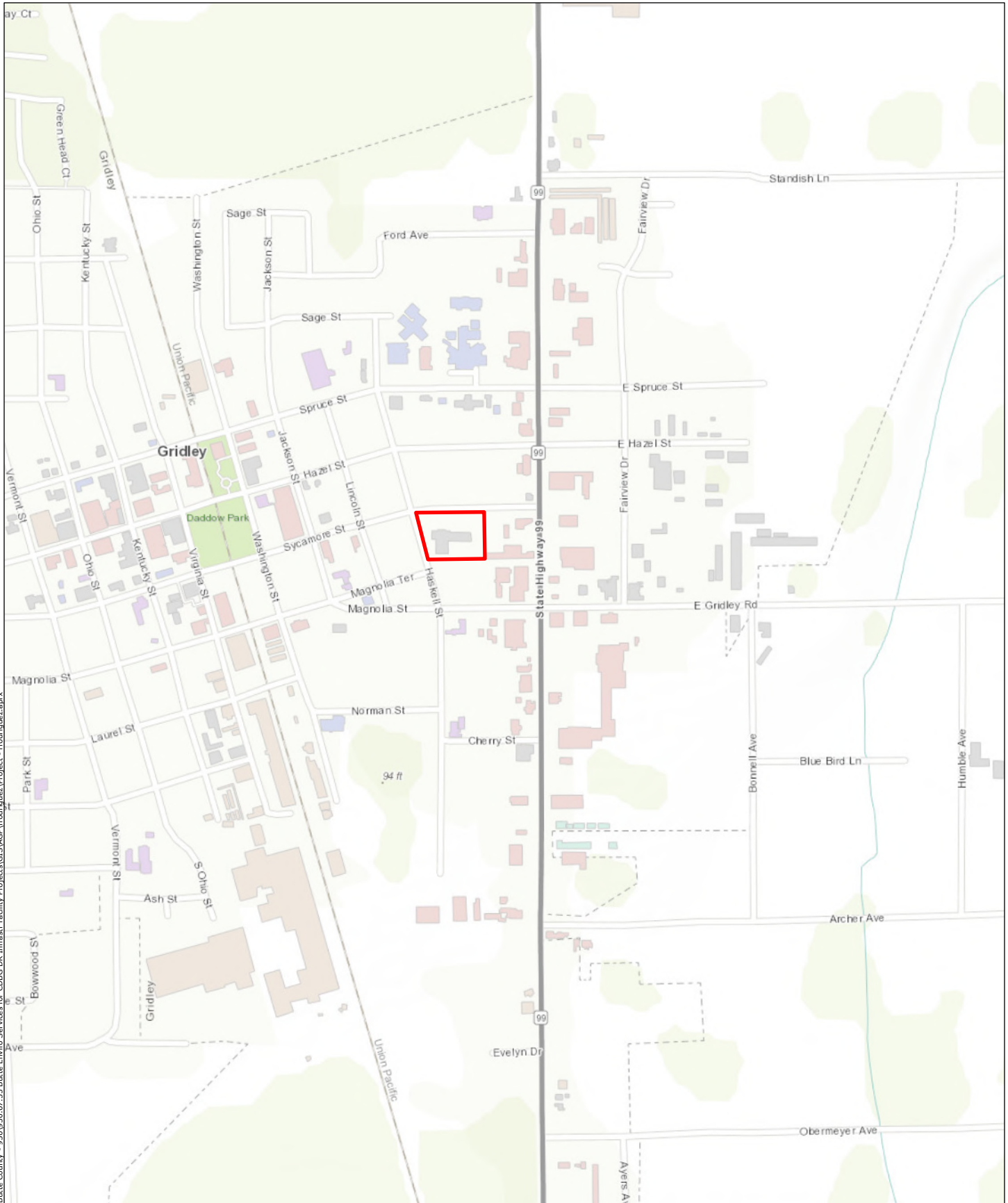
Attachment A – Figures

Attachment B – USFWS Information for Planning and Consultation Report

References

- California Department of Fish and Wildlife (CDFW). 2024a. "California Natural Diversity Database." Commercial Version. Accessed July 24, 2024. <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data#43018408-cnddb-in-bios>
- California Department of Fish and Wildlife (CDFW). 2024b. Special Animals List. California Natural Diversity Database. Gridley, CA. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406>
- California Department of Fish and Wildlife (CDFW). 2024c. State and Federally Listed Endangered, Threatened, and Rare Plants of California. California Natural Diversity Database. Gridley, CA. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109390>
- California Department of Fish and Wildlife (CDFW). 2024d. "California Wildlife Habitat Relationship System." Version 10.1.29. Accessed 24 July 2024. <https://wildlife.ca.gov/Data/CWHR>
- California Native Plant Society (CNPS). 2024. "Rare Plant Inventory." Online Edition, V 9.5. Accessed July 13, 2024. <https://www.rareplants.cnps.org>
- City of Gridley. 2023. "Chapter 24 Community Design and Character Element." Accessed July 24, 2024. http://gridley.ca.us/public/uploads/pdfs/GP_AR_CC_7-17-23.pdf
- U.S. Fish and Wildlife Service (USFWS). 2024. "Information for Planning and Consultation." Fish and Wildlife Service, Sacramento Field Office. Accessed July 24, 2024. <http://ecos.fws.gov/ipac>

Attachment A
Figures

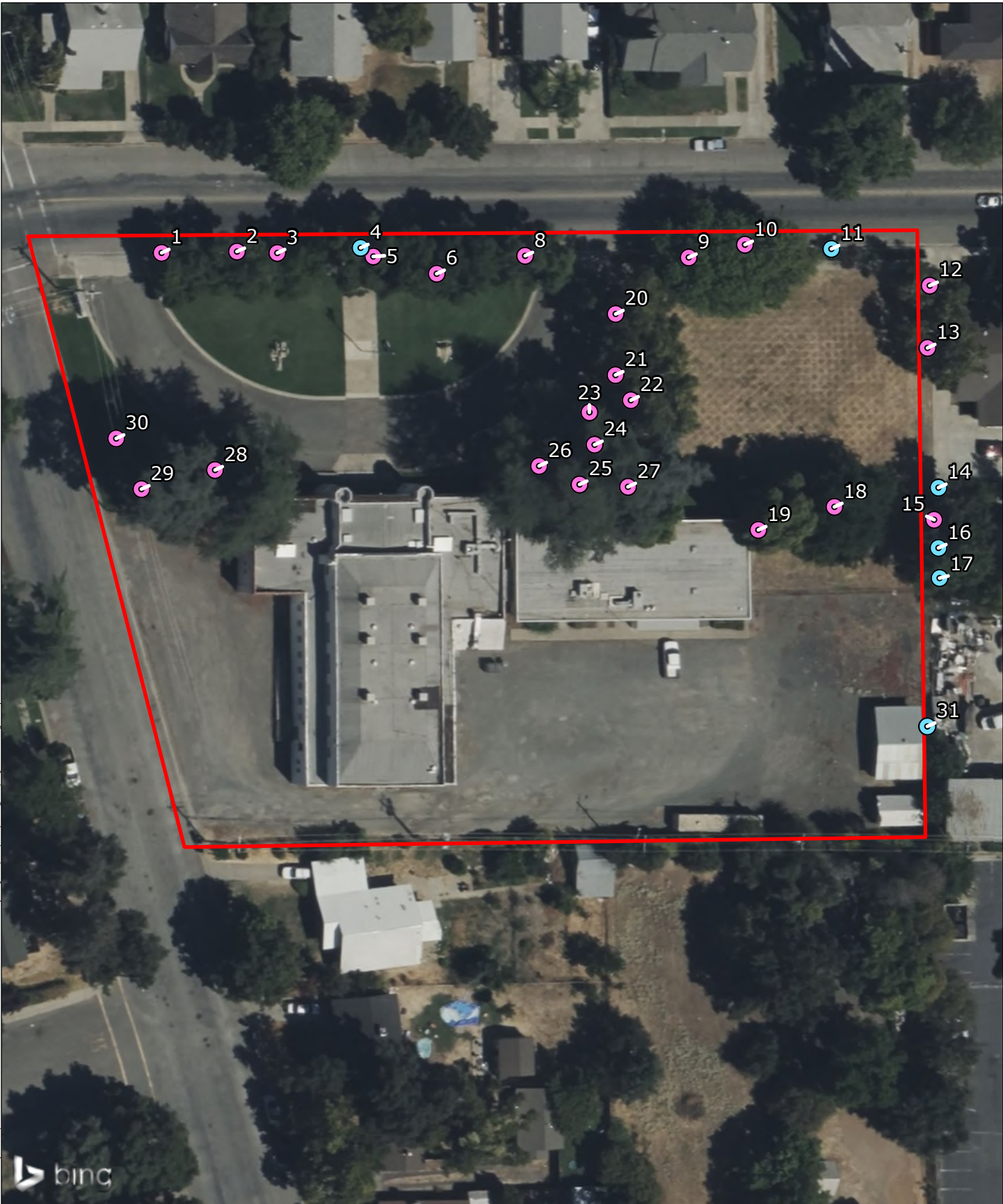


Legend Project site	NCE ButteCounty CALIFORNIA	Project Detail Map CDBG-DR Gridley Project 267 Sycamore Street, Butte County, CA			N 1 in. = 833 ft. 0 420 840 ft.	FIGURE 1
	SOURCE Topographic Basemap	JOB NUMBER 930.07.55	DRAWN rrodriguez	DATE 6/24/2024	REVISED 7/29/2024	APPROVED chute

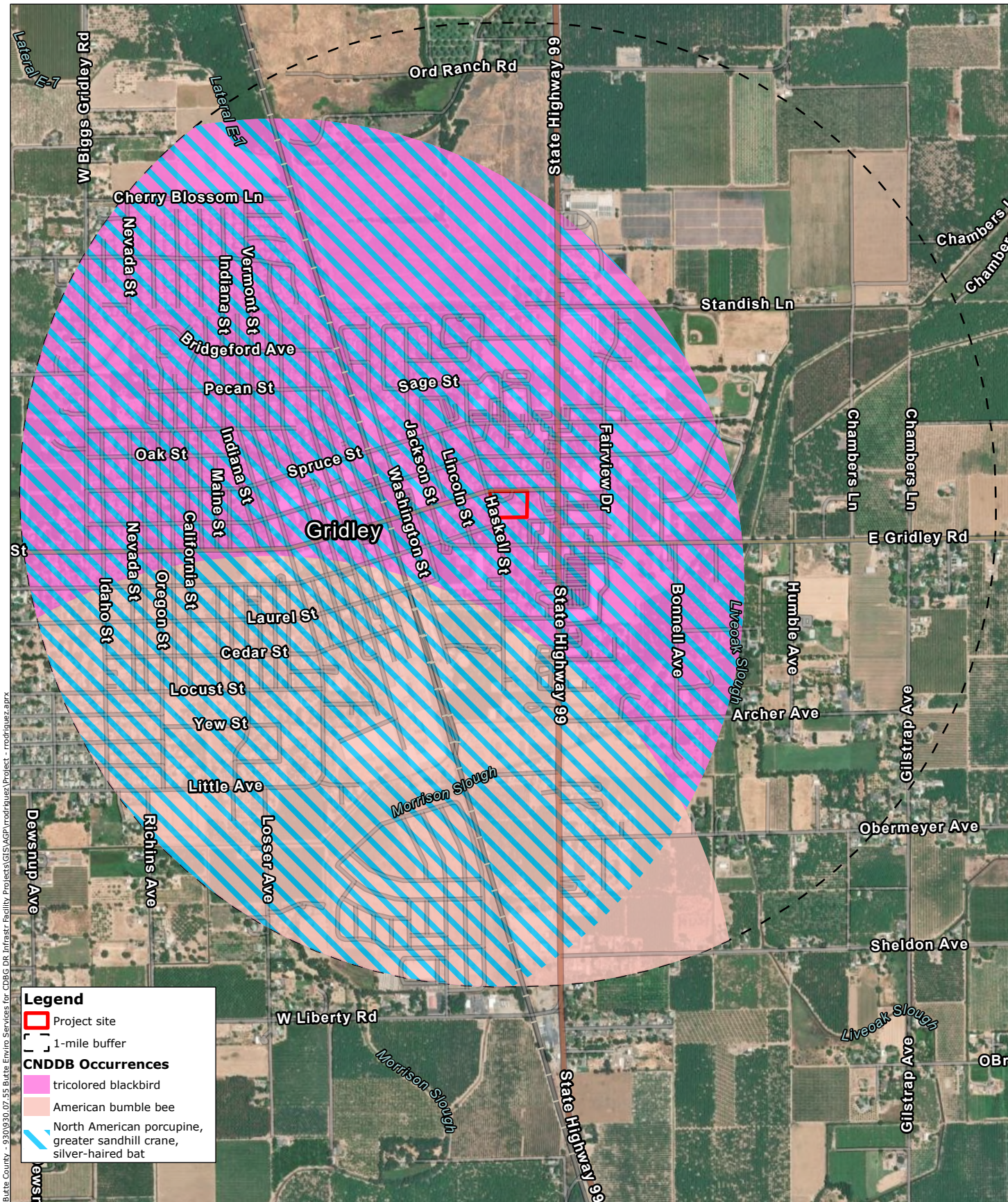


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Document Path: P:\Active Projects\Butte County - 930.07.55 Butte Enviro Services for CDBG-DR Gridley Project\GIS\ASGP\rodriguez\Project - rrodriguez.aprx



Legend - Project site - Tree Location (31) - Tree < 12" DBH	NCE ButteCounty CALIFORNIA	Tree Survey Map CDBG-DR Gridley Project 267 Sycamore Street, Butte County, CA	FIGURE 3 1 in. = 64 ft. 0 30 60 ft.	APPROVED chute
SOURCE Bing Aerial Basemap	JOB NUMBER 930.07.55	DRAWN rrodriguez	DATE 7/22/2024	REVISED 7/29/2024



Legend

- Project site
- 1-mile buffer

CNDDDB Occurrences

- tricolored blackbird
- American bumble bee
- North American porcupine, greater sandhill crane, silver-haired bat



CNDDDB Occurrence Map
 CDBG-DR Gridley Project
 267 Sycamore Street, Butte County, CA

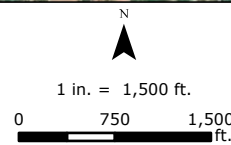


FIGURE
4

SOURCE
 Bing Aerial Basemap

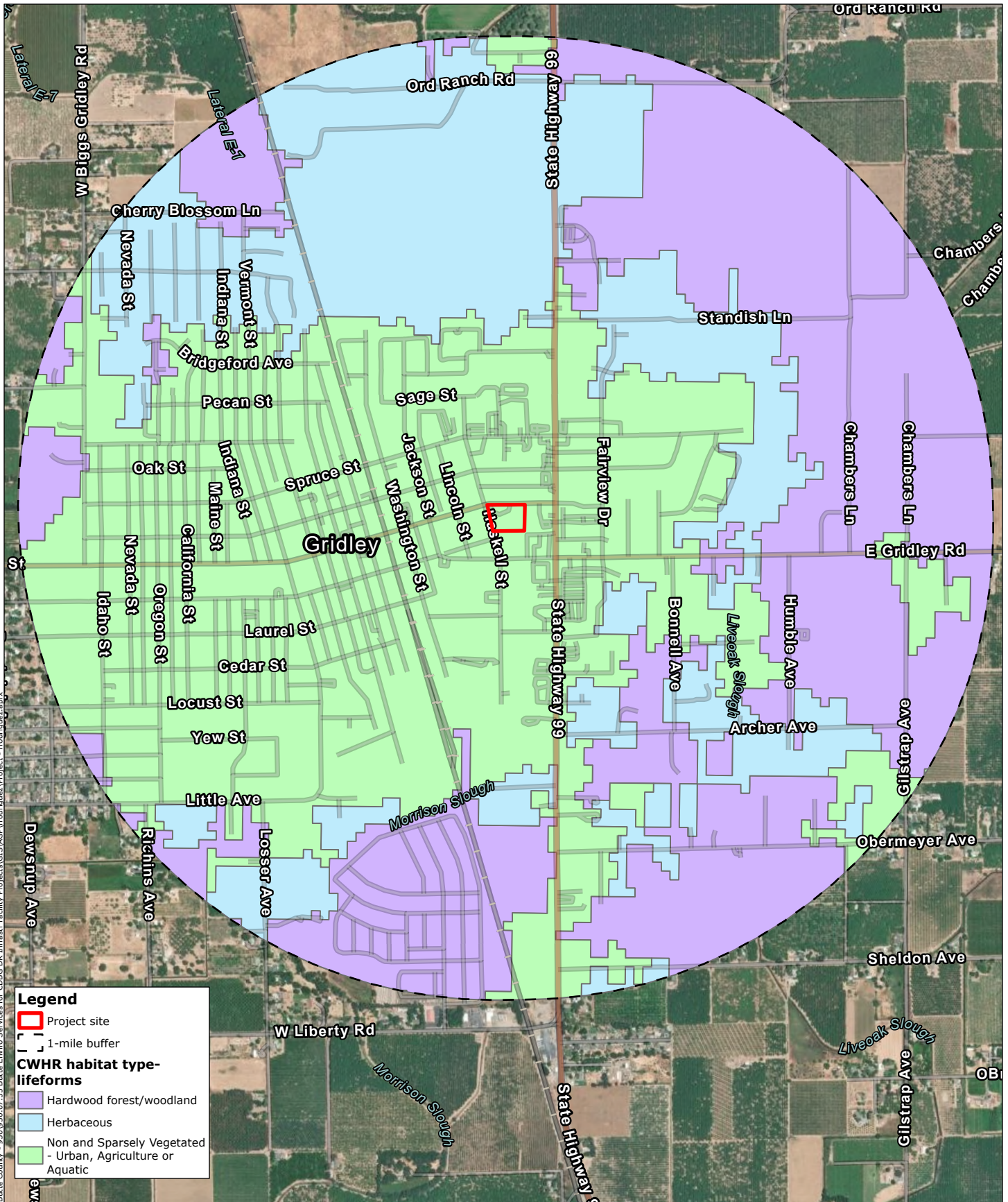
JOB NUMBER
 930.07.55

DRAWN
 rrodriguez

DATE
 6/24/2024

REVISED
 7/29/2024

APPROVED
 chute



Legend

- Project site
- 1-mile buffer

CWHR habitat type-lifeforms

- Hardwood forest/woodland
- Herbaceous
- Non and Sparsely Vegetated
 - Urban, Agriculture or Aquatic



CA Wildlife Habitat Relationship (CWHR) Vegetation Type

CDBG-DR Gridley Project
267 Sycamore Street, Butte County, CA

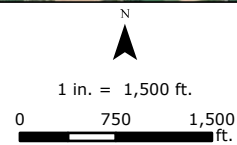


FIGURE
5

SOURCE
Bing Aerial Basemap

JOB NUMBER
930.07.55

DRAWN
rrodriguez

DATE
6/24/2024

REVISED
7/29/2024

APPROVED
chute

Attachment B

USFWS Information for Planning and Consultation Report



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Sacramento Fish And Wildlife Office

Federal Building

2800 Cottage Way, Room W-2605

Sacramento, CA 95825-1846

Phone: (916) 414-6600 Fax: (916) 414-6713



In Reply Refer To:

07/22/2024 21:00:13 UTC

Project Code: 2024-0119795

Project Name: Town of Gridley Project Site

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2))

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Sacramento Fish And Wildlife Office

Federal Building

2800 Cottage Way, Room W-2605

Sacramento, CA 95825-1846

(916) 414-6600

PROJECT SUMMARY

Project Code: 2024-0119795

Project Name: Town of Gridley Project Site

Project Type: New Constr - Above Ground

Project Description: The project could involve new construction on up to 6 acres, including parking lots, landscape, lighting, and street frontage improvements.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@39.36437035,-121.6898552454575,14z>



Counties: Butte County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 7 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

REPTILES

NAME	STATUS
Giant Garter Snake <i>Thamnophis gigas</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4482	Threatened
Northwestern Pond Turtle <i>Actinemys marmorata</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

AMPHIBIANS

NAME	STATUS
Western Spadefoot <i>Spea hammondi</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5425	Proposed Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate
Valley Elderberry Longhorn Beetle <i>Desmocerus californicus dimorphus</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7850	Threatened

CRUSTACEANS

NAME	STATUS
Vernal Pool Fairy Shrimp <i>Branchinecta lynchi</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/498	Threatened
Vernal Pool Tadpole Shrimp <i>Lepidurus packardii</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/2246	Endangered

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: NCE
Name: Ruby Rodriguez
Address: 1003 west cutting boulevard
Address Line 2: suite 110
City: point richmond
State: CA
Zip: 94804
Email: rrodriguez@ncenet.com
Phone: 5102153620

Appendix C

Cultural Resources Technical Memorandum

Cultural Resource Inventory Report

Gridley Behavioral Health Services Facility

Gridley, California

Butte County

25 County Center Drive

Suite 200

Oroville, California 95965

December 2024



1003 W. Cutting Blvd., Suite 110

Point Richmond, CA 94804

NCE Project No.55



Collaboration. Commitment. Confidence.SM

Cultural Resource Inventory Report

Gridley Behavioral Health Services Facility

Gridley, California

December 2024

Prepared for:

Butte County
Suite 200
Oroville, California 95965

Prepared by:

A handwritten signature in black ink, appearing to read "Stuart Rathbone".

Stuart Rathbone, Ph.D.
Staff Archaeologist and Architectural Historian

A handwritten signature in blue ink, appearing to read "Charles D. Zeier".

Charles Zeier, M.A.
Senior Scientist

A handwritten signature in black ink, appearing to read "Genevieve Pennanen".

Genevieve Pennanen
Staff Cultural Resources Specialist

NCE
1003 W. Cutting Blvd., Suite 110
Point Richmond, CA 94804
(510) 215-3620

NCE Project No. 930.07.55

Engineering & Environmental Services

www.ncenet.com

Administrative Summary

Butte County proposes to undertake the Gridley Behavioral Health Services Facility Project (Project) located on four parcels at 267 Sycamore Street, Gridley, Butte County, CA. The Project consists of two distinct elements, rationalizing the current arrangement of parcels and constructing a new building within one of the open space areas. The approximately 2.35-acre Project area consists of four adjacent parcels with individual Assessor Parcel Numbers (APN); APN 010-170-001; APN 010-170-019; APN 010-170-003; APN 010-170-020. One of the parcel boundary lines runs through the middle of the Butte County Offices and Court Building. The proposed Project would combine the existing parcels to remove the conflict. A new 10,000 to 14,000 square feet (SF) one-story Behavioral Health Center (BHC) would then be constructed in one of the open space areas. The Project must comply with Public Resource Code Section 21083.2 of the California Environmental Quality Act (CEQA).

The Project area contains the Gridley Veteran's Memorial Hall, the Butte County Offices and Court Building, areas of landscaped open space, a parking lot, two sheds, a shipping container, and a variety of monuments. NCE conducted an intensive cultural resources inventory of the Project area to locate, describe, and evaluate cultural resources. An Area of Potential Effect (APE) was defined as encompassing the Project area and several parcels beyond the Project area, adjacent to where the BHC would be constructed.

NCE searched records at the Northeast Information Center (NEIC). The search results indicated that no previously recorded cultural resources were located within the APE. NCE conducted a cultural resources inventory of the APE on July 3, 2024. NCE did not locate archaeological resources within the Project area. NCE recorded two primary architectural resources within the Project area, each of which had associated resources. The Project area lies adjacent to one potential historic district, the historic core of Gridley, and lies within a second potential historic district, a small early 20th century addition to the historic core of Gridley. NCE evaluated the two primary architectural resources for National Register of Historic Places (National Register) and California Register of Historical Resources (California Register) eligibility and provided preliminary assessments of the potential historic districts.

NCE recommends that the Gridley Veterans Memorial Building as being eligible for the National Register and the California Register under Criteria A/1 and C/3, and that the Butte County Offices and Court Building is not eligible for the National Register and the California Register under any of the criteria. The preliminary assessment of the two potential historic districts suggested that the historic core of Gridley may be eligible for the National Register and the California Register under Criteria A/1, B/2, and C/3, and that the small early 20th century addition to the eastern edge of the historic core of Gridley may not be eligible for the California Register.

The proposed rationalization of the four parcels within the Project area is an administrative action and will have no effects that would impact either known or unknown cultural resources located within the Project area. The proposed construction of the BHC will have visual impacts to one resource recommended eligible for the California Register, the Gridley Veterans Memorial Building. NCE recommends that these visual impacts will be relatively minor and will not constitute an adverse effect to a historic property. NCE identified that the Gridley Veterans Memorial Building lies within one potentially ineligible Historic District and adjacent to a potentially eligible historic district. NCE recommends that these visual impacts to the potential historic districts will be relatively minor and will not constitute an adverse effect to a historic property.

Based on these considerations, NCE recommends that the Project will have no effect on archaeological or architectural resources designated as historic properties and meets the definition of “no historic properties affected,” as that term is defined in 36 CFR Part 800.4(d)(1), and will not cause a substantial adverse change in the significance of an historical resource, as that term is defined in PRC 5024.1 and CEQA Guidelines Section 15064.5(b)(3).

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Appendix C

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Appendix D

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Appendix E

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Appendix F

DPR Forms

List of Abbreviations

Abbreviation	Definition
AB-52	Assembly Bill 52
AC	Air Conditioning
ACHP	Advisory Council on Historic Preservation
ADI	Area of Direct Impact
AIE	Area of Indirect Effect
APE	Area of Potential Effect
APN	Assessor Parcel Number
ASE	Area of Secondary Effect
BCCC	Butte County Canal Company
BHC	Behavioral Health Center
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHL	California Historical Landmarks
DPR	Department of Parks and Recreation
ILCC	Irrigated Land Company of California
MONCA	Museum Of Northern California Art
NAHC	Native American Heritage Commission
NEIC	Northeast Information Center
NRHP	National Register of Historic Places
PRC	Public Resource Code
SF	Square Feet
SLF	Sacred Lands File
USDA	United States Department of Agriculture

List of Abbreviations

USGS	United States Geological Survey
WSS	Web Soil Survey

1 Introduction

1.1 Project Description

Butte County proposes to undertake the Gridley Behavioral Health Services Facility Project (Project) located on four parcels at 267 Sycamore Street, Gridley, Butte County, California (Figures 1-3, **Appendix A**). The Project consists of two distinct elements, rationalizing the current arrangement of parcels and constructing a new building within one of the open space areas. The approximately 2.35-acre Project area consists of four adjacent parcels with individual Assessor Parcel Numbers (APN); APN 010-170-001; APN 010-170-019; APN 010-170-003; APN 010-170-020. One of the parcel boundary lines runs through the middle of the Butte County Offices and Court Building. The proposed Project would combine the existing parcels to remove the conflict. A new 10,000 to 14,000 square feet (SF) one-story Behavioral Health Center (BHC) would be constructed in one of the open space areas. The Project must comply with Section 106 of the National Historic Preservation Act of 1966, and with Public Resource Code Section 21083.2 of the California Environmental Quality Act.

NCE conducted a cultural resources inventory of the APE on July 3, 2024. NCE did not locate archaeological resources within the Project area. NCE recorded two primary architectural resources within the Project area, each of which had associated resources. Neither of the buildings have been previously evaluated for the National Register of Historic Places (National Register) or the California Register of Historical Resources (California Register), and neither of the resources are listed in the California Historical Landmarks (CHL) database for Butte County. The Project area lies adjacent to one potential historic district, the historic core of Gridley, and lies within a second potential historic district, a small early 20th century addition to the historic core of Gridley. NCE evaluated the two primary architectural resources for National Register and California Register eligibility and provided preliminary assessments of the potential historic districts.

This report describes a cultural resources inventory of the 2.35-acre Project area conducted by NCE. All work was designed to comply with current state and professional standards. The cultural resources inventory involved the following stages.

- Establish an APE.
- Conduct a pedestrian survey to Identify prehistoric and historic period archaeological resources in the Project area.
- Evaluate identified archaeological resources in the Project area as to their eligibility for listing in the National Register and/or the California Register.
- Undertake a detailed architectural survey of all primary and secondary architectural resources within the Project area and undertake a preliminary survey of architectural resources within the APE but outside of the Project area.
- Evaluate identified architectural resources in the Project area as to their eligibility for listing in the National Register and/or the California Register.
- Identify whether the Project area lies within any potential historic districts and recommend whether the Project has the potential to impact any potential historic districts.

- Provide management recommendations for those properties considered eligible for the National Register and/or the California Register.

1.2 Definition of Undertaking

The Project area contains the Gridley Veteran's Memorial Hall, the Butte County Offices and Court Building, landscaped open spaces, a parking lot, two sheds, a shipping container, and a variety of monuments. NCE conducted an intensive cultural resources inventory of the Project area to locate, describe, and evaluate cultural resources. The Area of Potential Effect (APE) encompassed the Project area and several parcels beyond the Project area, adjacent to where the BHC would be constructed.

1.3 Area of Potential Effect

Consistent with judicial rulings summarized by the Advisory Council on Historic Preservation (ACHP) (2019), an APE consists of three components. The first is the area affected by the undertaking at the same time and place with no intervening cause. This is the Area of Direct Effect (ADE). Most often this is the area that incurs direct Project-related physical impact. The second is the area affected by the undertaking at the same time but that is somewhat removed from the ADE. This is the Area of Secondary Effect (ASE). These non-physical, direct effects are most often visual, auditory, or atmospheric in nature. The third is the area in which the undertaking may cause effects later in time or farther removed in distance, but that are reasonably foreseeable. This is the Area of Indirect Effect (AIE). Indirect effects occur due to various forms of reasonably foreseeable actions:

- Connected actions – those actions that are closely related and therefore should be discussed in the same impact assessment. Actions are connected if they 1.) trigger other actions that may require impact assessment, or 2.) cannot or will not proceed unless other actions are taken previously or simultaneously.
- Growth-inducing actions – effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on natural systems, including ecosystems.
- Cumulative inducing actions – effects which result from the incremental impact of the action when added to other past, present, and other reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions.

To be reasonably foreseeable, the action must be probable and cannot be based on speculation. Judgments concerning the probability of future actions must be made based on information obtained from reliable sources.

The current Project involves two activities, rationalizing the existing parcel boundaries, and constructing a new building. Modifying the existing parcel boundaries for APN 010-170-001, APN 010-170-019; APN 010-170-003, and APN 010-170-020 will be a purely administrative procedure, and it will have no physical impacts on any of the parcels. This phase of the Project does not have an area of Potential Effects.

The proposed new one-story Behavioral Health Center (BHC) would be constructed in what is currently parcel APN 010-170-003, with access extending into APN 010-170-019. The ADE is limited to these two parcels. Because the proposed building is only a single-story building, the ASE is defined as those parcels immediately adjacent to the ADE which will have the highest level of visual impact due to construction of the proposed building (APN 010-170-020, APN 010-170-001, and APN 010-170-023, and those parcels on the far side of Sycamore Street that face directly onto the ADI, APN 010-152-020, APN 010-152-019, APN 010-152-018, and

APN 010-152-017). Butte County did not identify reasonably foreseeable actions associated with the Project. As a result, the AIE is coincident with the ASE.

2 Consultation Communications

2.1 Native American Coordination

Following Assembly Bill 52 (AB-52) as identified in the Public Resource Code (PRC) Section 21080.3.1(b)(2) of California Environmental Quality Act (CEQA), Native American tribes identified by the Native American Heritage Commission (NAHC), must be invited to consult on projects. Native American correspondence was initiated with a letter to the NAHC. The letter requested a search of their Sacred Lands File (SLF) and a contact list for regional tribes that may have knowledge of tribal cultural resources within or immediately adjacent to the APE. A response was received from the NAHC on June 27, 2024, which indicated negative SLF results within the vicinity of the APE. Inquiry letters were mailed on Butte County letterhead to the tribes identified by NAHC (**Table 1**) on August 21, 2024.

Table 1. Tribal Representatives Identified by the NAHC

Tribal Affiliation	Representative	Title
Mooretown Rancheria of Maidu Indians	Benjamin Clark	Chairperson
Nevada City Rancheria Nisenan Tribe	Richard Johnson	Chairman
Round Valley Reservation/ Covelo Indian Community	James Russ	President
TSI-AKIM Maidu of the Taylorsville Rancheria	Richard Cunningham	Vice Chairperson
	Ben Cunningham	Tribal Council Member
	Ben Cunningham-Summerfield	Cultural Advisor
	James Moon	Tribal Member
	Donald Ryberg	Chairperson
United Auburn Indian Community of the Auburn Rancheria	Matt Moore	Tribal Historic Preservation Officer
	Gene Whitehouse	Chairperson

Follow-up emails were sent on September 11, 2024 (**Table 2**). **Table 2** provides a summary of correspondence with all tribes identified by the NAHC.

Table 2. Summary of Tribe Consultation Correspondence

Tribal Affiliation	Representative	Sent Letters	Follow Up Emails	Communications
Mooretown Rancheria of Maidu Indians	Benjamin Clark	8/21/24	-	8/28/24 – Mooretown indicated a strong possibility of cultural material in the APE and asked to begin formal consultation.

Tribal Affiliation	Representative	Sent Letters	Follow Up Emails	Communications
				9/11/24 – Acknowledged consultation decision and asked for recommended mitigation measures.
Nevada City Rancheria Nisenan Tribe	Richard Johnson	8/21/24	9/11/24	No comment to date.
Round Valley Reservation/ Covelo Indian Community	James Russ	8/21/24	9/11/24	No comment to date.
	Richard Cunningham			
TSI-AKIM Maidu of the Taylorsville Rancheria	Ben Cunningham Ben Cunningham-Summerfield James Moon Donald Ryberg	8/21/24	9/11/24	No comment to date.
United Auburn Indian Community of the Auburn Rancheria	Matt Moore Gene Whitehouse	8/21/24	-	8/21/24 – Web submission for consultation. 9/3/24 – UAIC declined to consult since the Project is outside their traditional affiliated lands.

Pursuant of California PRC Section 21080.3.1(b)(2) of CEQA, the 30-day response time limit for Native American inquiry regarding the Project has expired. Consultation-related material, including NAHC letters and responses, an example of the tribal consultation letter sent, certified mail receipts, and email correspondence are provided in **Appendix B**.

2.2 Public Outreach

NCE did not conduct any formal public outreach as part of this study. NCE attempted to contact the veteran's organizations that utilize the building in November 2024, but did not receive a response.

3 Literature Review

The purpose of a literature review is to create an understanding of work that has occurred in the area previously and the types of cultural resources present in the area, and to build a historic context. Historic contexts are those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history is made clear. Prior to the onset of field inventory activities, NCE conducted sufficient archival research to inform expectations in the field and to develop an understanding of the historical context of the region. The archival research included a records search request from the Northeast Information Center (NEIC), examination of various historic maps (e.g., General Land Office [GLO] plat maps and United States Geological Survey [USGS] topographic maps), and research undertaken at the Gridley Museum. Emphasis was placed on the identification of previous archaeological and architectural inventories and sites within a 200-meter radius of the APE, known as the archival study area. The results of the records search received from the NEIC (File No. NEIC-000175) are provided in **Appendix C**.

3.1 Previous Inventories

Archival research indicates that three inventories that include the archival study area have been conducted previously (**Table 1**), only one of which was carried out within the past 30 years. All the studies are large scale surveys looking at Gridley and its vicinity, or only including the archival study area within a regional overview.

Table 3. Previous Inventories within 200 meters of the APE.

Report Number	Title	Author	Year
000175	Cultural Resource Overview for Gridley and Vicinity, Butte County, California	Johnson, K.	1979
000839	The Archaeology and Prehistory of Plumas and Butte Counties, California: An Introduction and Interpretive Model	Kowta, M.	1988
014341	Part I – Overview: A Class I Cultural Resources Overview and Existing Information Inventory for the Northwest California Integrated Resource Management Plan, Bureau of Land Management, Redding, and Arcata Field Offices	King, J. H. et al	2016

3.2 Previously Recorded Resources

Archival research indicates no cultural resources have been recorded previously within the archival study area.

3.3 Historic Maps and Aerial Images Consulted

Historic maps from the USGS' Historical Topographic Map Collection were reviewed as part of the present study. Historic maps reviewed as part of the present study included the following:

- USGS 1:125,000 Marysville, California, Topographic Map, 1888
- USGS 1:125,000 Marysville, California, Topographic Map, 1891
- USGS 1:125,000 Marysville, California, Topographic Map, 1894

- USGS 1:125,000 Marysville, California, Topographic Map, 1895
- USGS 1:31,680 Gridley, California, Topographic Map, 1912
- USGS 1:24,000 Gridley, California, Topographic Map, 1952
- USGS 1:62,500 Gridley, California, Topographic Map, 1952 (1968 revision)
- USGS 1:24,000 Gridley, California, Topographic Map, 1952 (1974 revision)
- USGS 1:100,000 Yuba City, California, Topographic Map, 1993

Aerial photographs dating from 1958, 1969, 1973, 1984, 1998, 2005, 2010, 2012, 2014, 2016, 2018, 2020, and 2022 were reviews using the Historic Aerials website (Historicaerials.com).

4 Environmental Setting

4.1 Current Physical Setting

The Project area lies within the eastern part of the town of Gridley. Gridley is located within the eastern part of the Upper Sacramento Valley (Butte, Colusa, Glenn, Plumas, Sierra, and Tehama counties), and lies at an elevation of 90-feet above sea level. It is 2.5-miles to the east of the current course of the Feather River. Gridley lies within an extensive flood plain area, characterized by slopes of between 0 and 1%. Soils are moderately deep and moderately well drained, having formed in alluvium from mixed sources. The depth to paralithic contact varies between 20 and 40 inches (National Cooperative Soil Survey 2023). The alluvial deposits extend in a wide northwest to southeast trending band across the western third of Butte County. Sandstone formations begin about 8km north of Gridley, in the area surrounding the Thermalito Afterbay reservoirs, and extend eastward to the foothills of the Sierra Nevada where they meet basalt and Mafic volcanic rock formations. The area was the subject of an extensive agricultural irrigation scheme in the early 20th century, which is still in operation (see **Section 5**). The agricultural land surrounding Gridley is divided into neat rectangular fields, which vary in size between 5 and 150 acres, with the typical size being around 30 acres.

4.1.1 Soils

The United States Department of Agriculture (USDA) Web Soil Survey (WSS) lists a single soil type within the Project area (Table 4).

Table 4. APE Soils

Soil Name	Slope Range	Landform	Drainage Class	Parent Material	Percent Coverage
Gridley taxadjunct loam	0-2%	Fan remnants	Somewhat poorly drained	Loamy and clayey alluvium cemented loamy alluvium derived from igneous and metamorphic rock	100%

4.2 Flora and Fauna

The entire Project area has been landscaped. Vegetation consists of manicured lawn areas, mature camphor trees concentrated along the boundary with Sycamore Street, and mature cedar trees located in a rough alignment that runs parallel to the front façade of the Veterans Memorial Building.

5 Historic Background

Gridley is a small town in the Upper Sacramento Valley in Butte County, California. It lies 55 miles north of Sacramento, 15 miles north of Yuba City, 12.5 miles southwest of Oroville, the county seat, and 26 miles south of Chico. The Feather River lies 2.5 miles to the east of the town, and State Highway 99 runs through the eastern edge of the town.

In 1850 George Washington Gridley (1817-1881) travelled from his home in Galena, Illinois, to explore burgeoning opportunities to be found in California after the onset of the goldrush. Before returning home he ventured beyond the goldfields and travelled through the Sacramento Valley where he saw considerable potential for developing agriculture. In 1852 he returned to the Sacramento Valley with a herd of sheep and began his ranching operations on a 960-acre ranch located around four miles north of the buttes. When the California and Oregon branch of the Central Pacific Railroad was constructed through the valley in 1870, Gridley was in possession of 25,000 acres of land and 116,000 head of sheep. Gridley petitioned the railroad to construct a station convenient to his operations, and as an encouragement he constructed a large warehouse for storing wool close to where he desired the station to be built. The railroad accepted his petitions, constructed a station, and laid out a townsite on his land. Gridley was awarded the naming rights and chose to memorialize his accomplishments by naming the new town Gridley Station. The new town flourished thanks to its rail connection, but growth was impacted by repeated fires. As early as 1891 meetings were held to discuss incorporation, with the main benefit being the potential to improve fire protection services. In 1905, following another major fire, the town was incorporated through the process of a special election held on November 16, 1905 (King and Van De Hey 2015:7-9).

The original core of the town consisted of 35 blocks in a seven-by-five block grid, with the railroad running from northwest to southeast through the center of the town. The main road, Sycamore Street, runs northeast to southwest through the center of the town, forming a cross pattern of major infrastructure that divided the historic core into four roughly equal quarters. The train depot was located at Sycamore and Washington Street, with the City Plaza located on the opposite side of the tracks at Sycamore and Virginia. The original train depot was replaced by a larger facility in 1893, after the Central Pacific Railroad and the Southern Pacific Railroad had amalgamated (King and Van De Hey 2015:10-12). The site of the Southern Pacific Railroad depot is currently occupied by a telecommunications tower, but the plaza survives and is still maintained. Commercial properties ran along Sycamore Street, and the parallel roads to the north and south, Hazel Street and Magnolia Street. Warehouses and agricultural produce processing facilities crowded along the railroad, and the rest of the blocks were filled with residences (many of which were fine Victorian homes), schools, and churches. Notable early businesses included the Gridley Herald newspaper, William Henry Hall's Store, Hackett and Jeffrey's Cigar Store, the William Brown Meat Market, the Gridley Livery Stable, the Gridley Creamery and Ice Company, the Gridley State Bank, the Rideout Bank, the Norman Drugstore, the Old Roma Liquor Store, the Farmers' Mechanics' Merchandise Store, the Gridley Hotel, the Pacific Hotel, the Gridley Steam Flouring Mills, The Gridley Flour Mill, and the Standish Foundry and Workshop (King and Van De Hey 2015:27-48). In 1900 the town gained a telephone exchange (King and Van De Hey 2015:97-98). The first cinema, the Hippodrome Theatre, was opened by Fred Fink Sr. in 1911. This was replaced by the Fink Theater in 1915 which operated until 1938 when the larger Butte Theatre opened (King and Van De Hey 2015:99-100). In 1906 the Ladies Improvement club began working on the goal of creating a city library. Their goal was realized in 1915 after they received a grant from Andrew Carnegie, and a fine small library designed by Chester Cole was constructed at Sycamore and Kentucky.

In 1949 the Biggs-Memorial Hospital opened after a two-year campaign to collect local donations (King and Van De Hey 2015:93).

Agriculture was the main source of employment in the Upper Sacramento Valley, and between 1870 and 1910 Portuguese immigrants who worked on the farms and ranches were the most numerous ethnic group in the area. During the 1890s the local farmers identified the need for an extensive irrigation system and bought out the Gridley Herald newspaper to promote their cause (King and Van De Hey 2015:28). By 1906 an extensive irrigation system was in place, under the control of the Irrigated Land Company of California (ILCC) and the Butte County Canal Company (BCCC). The Irrigation district drew water from the Feather River at a large headgate southwest of Oroville (ILCC 1908: 4-5, 14). Water was distributed around Gridley and the Live Oak and Sunset areas to the south by a number of large canals. Irrigated water was drained into the Sacramento River just upstream of its confluence with the Feather River, at Knights Landing (ILCC 1908:14). Crops successfully grown in the Gridley area include peaches, prunes, grapes, almonds, walnuts, figs, olives, oranges, apples, pears, alfalfa, vegetables, rice, and wheat; dairy cattle, sheep, and poultry were the important livestock types (ILCC 1908:3; King and Van De Hey 2015: 68, 77-78). In 1896 the Gridley Community Cannery was opened, initially for canning peaches, but expanding later to include pumpkin. The cannery would provide long-lasting employment opportunities for the women of Gridley. In 1920 a new facility was built to replace the original and for a time it was the largest peach cannery in the world (King and Van De Hey 2015:79-82). In 1906 ILCC began advertising Gridley as “the place where crops never fail.” This successful marketing campaign led to an influx of members of the Church of Jesus Christ of Latter-day Saints, initially from the Rexburg area of Idaho and subsequently from various locations in Nevada and Utah. Many of the new settlers moved to the Gridley Colonies, a series of small farmsteads organized by the ILCC surrounding the town (ILCC 1908). By 1908 there were around 500 members of the Church of Jesus Christ of Latter-day Saints (Gridley Reunion Committee 1980), and today they are understood to be the most numerous communities in the area (Gridley Museum, pers comms).

The Pacific Coast Business Directory for 1876-1878 has entries for 24 businesses in Gridley (Langley 1875:152-153). McKenny’s Pacific Coast Directory for 1880-1881 has entries for 32 businesses in Gridley (McKenny & Co 1880:590-591), and the town is described as follows.

Is a new and thriving place of 900 inhabitants, 69 miles from Sacramento, on the Oregon Division of the C. P. Railroad. It has a flouring mill and other manufactories. It was named after G. W. Gridley, Esq. The country surrounding it is rich agriculturally (McKenny & Co 1880:584).

McKenny’s Pacific Coast Directory for 1883-1884 has entries for 58 businesses in Gridley (McKenny & Co 1882:590-591), and the town is described as follows.

Gridley. Butte County. A post, express and telegraph office. It is a new and growing town, 69 miles north of Sacramento, on the Oregon Division of the Central Pacific R. R. It has a large flouring-mill, and has a block of brick buildings going up which will improve the town very much. There are also many time residences. The town is beautifully located in the center of a grove of live-oak timber. The country surrounding is rich agriculturally. Population 900. (McKenny & Co 1882:590)

McKenny’s Pacific Coast Directory for 1886-1887 has entries for 78 businesses in Gridley (McKenny & Co 1886:476-477), and the town is described as follows.

Gridley. Butte County. The town is situated on the Oregon Division of the Central Pacific Railroad, 70 miles north of Sacramento, 15 miles west of Oroville, 26 miles south of Chico, 2.5 miles from Feather River, and 20 miles east

of the Sacramento River; has a population of 700. Agriculture is its chief source of support, being surrounded by rich arable land of three different qualities, to wit: river bottom, where failure of crops is unknown; timber land, which has a fine sandy soil peculiarly adapted for wheat, the wood paying the expense of cleaning, and the adobe land west of town, which is a fine grain producing soil, now being drained and cultivated in such a manner that a good crop every year is almost certain. The town is beautifully located in the center of a grove of live oak timber, where there is sandy soil, making it free from mud during winter. There are three churches. The various fraternal societies are represented and are in a prosperous condition. It has also a bank and several large warehouses, affording storage for an immense quantity of grain (McKenny & Co 1886:476).

Although a crude measure, and not without some serious issues such as not accounting for businesses that may have opened and closed or businesses that did not get listed in the directories, these results suggest 24 businesses opened in Gridley in the six years between 1870 and 1875, 34 businesses opened in the seven years between 1876 and 1882, and 20 businesses opened in the four years between 1883 and 1886. The annual average of new businesses opening during the first 17 years of Gridley's existence suggests steady and consistent growth, with an average of four businesses per year opening between 1870 and 1875, and an average of five businesses per year between 1876 and 1886.

The California State Gazetteer and Business Directory for 1890 has entries for 52 businesses in Gridley (R.L Polk and Co 1890:305-306), and the town is described as follows.

Gridley. A post office on the S. P. R. R., in Butte county, 3.5 miles south of Biggs, and 16 southwest of Oroville. The village contains 4 churches, United Brethren, Methodist, Catholic and Presbyterian, a public school, a bank and flour mill, A newspaper, the Herald, is published weekly. Population, 1,000, Telegraph W. U. and P. P. Exp., W. F. & Co. Mail, daily. C. J. Walsh, postmaster (R.L Polk and Co 1890:305).

Taken at face value, this figures from 1890 directory suggests that in the late 1880s the number of businesses began to diminish, and the town had entered a period of contraction, with 26 businesses having shuttered over four years from 1887 and 1890. However, this potential decline would require more in-depth research, and potential explanations that do not require contraction include that the Polk directory was not as attractive to prospective customers in Gridley, or that existing businesses had merged.

The California State Gazetteer and Business Directory for 1893 has entries for 69 businesses in Gridley (R.L Polk and Co 1893:255), and the town is described as follows.

On the S. P. R. R, in Butte Co., 3.5 miles south of Biggs and 16 southwest of Oroville, the co. seat. The village contains 5 churches, United Brethren, Methodist, Catholic, Christian and Presbyterian, a public and high school, a bank, flour mill, two hotels. A newspaper, the Herald, is published weekly. Telegraph, W. U. and P. P. Exp., W., F. & Co. Mail, daily. L. C. Stone, Postmaster (R.L Polk and Co 1893:255).

This entry suggests that the period of contraction, if real, had reversed and the town was again thriving. Since the dates of the potential contraction lie between 1887 and 1892, it is possible that this relates to the nationwide recessions of 1887-1888. Additional research is necessary to determine if local factors were at play, or whether the apparent contraction is an artifact of the change from the McKenny Directories to the Polk Directories.

United States Decennial Census data suggests that the population of Gridley has grown steadily but slowly since 1980, with no decades of overall decline. During the 20th century the period between 1910 and 1920 saw a 66%

increase in population, likely relatable to the influx of Church of Jesus Christ of Latter-day Saints to the Gridley Colonies. The current population is estimated to be around 7,300 people, and around 2,500 housing units.

6 Historic Context

Veterans Memorial Halls represent a common type of architectural resources located in many American towns and Cities. The halls were typically organized by one of two different veterans' organizations, the Veterans of Foreign Wars and the American Legion, or through the cooperation of both organizations. Veterans Memorial Halls were constructed in large numbers following World War I and World War II. Far fewer were constructed in the last half of the 20th century. The few that did appear replaced outdated facilities or were new facilities where none was previously present. Because of the wide date range there is little consistency in architectural style or design amongst veterans halls. However, in locations where veterans memorial halls were constructed in close geographic and chronological proximity common designs and styles may be apparent. An example of this can be seen in Butte County, where the Chico Veterans Memorial Building and the Gridley Veterans Memorial Building were both constructed in 1926 and exhibit similar Italianate stylings. Veterans Memorial Buildings are typically multi-purpose buildings used for a range of activities including veterans support services, educational opportunities, museums and memorials, meeting spaces, holding events, and fundraising activities. Modern facilities typically incorporate a large open plan hall, smaller meeting rooms, a kitchen, and restrooms.

Six Veterans Memorial Halls are in Butte County, five of which remain in use. The oldest two are the Gridley Veterans Memorial Building at 267 Sycamore Street, Gridley, and the original Chico Veterans Memorial Building at 900 Esplanade, Chico. The Gridley example is slightly older (1926), while the Chico example was constructed the following year (1927). Both buildings were constructed in an Italianate style, and both were positioned on the main thoroughfare leading through Gridley and Chico, Sycamore Street, and the Esplanade, respectively. The Chico Veterans Memorial Building was designed by prominent Chico based architects Louis Brouhard and Chester Cole, who specialized in public buildings, including numerous schools in Chico and the Veterans' War Memorial in nearby Willows, Glenn County, CA (Cahill 1931). Chester Cole also designed the Carnegie Library building at 519 Kentucky Street in Gridley (Carnegie-libraries.org 2009). It is of note that the Chico Veterans Memorial Hall resembles a traditional museum building, while the Gridley Veterans Memorial Building resembles a large industrial building with the decorative elements limited to the front façade. NCE has not identified the architect that designed the Gridley Veterans Memorial Building, but given its revival stylings, Brouhard and Cole may have been involved, at least with the design of the façade. The Gridley Veterans Memorial Building is home to the Veterans Foreign War Post 5731 and the American Legion Post 210. The Chico Veterans Memorial Building was home to the Veterans Foreign War Post 1555 and the American Legion Post 17 until around 2009, when the building was found to be unfit for continued use. The Veterans Foreign War Post 1555 and the American Legion Post 17 relocated to a mid-century-modern style office building owned by Butte County located at 554 Rio Lindo Avenue. It was constructed in the mid-1960s. The original Chico Veterans Memorial Building has been refurbished and reopened as the Museum of Northern California Art (MONCA) in 2017 (Monca.org 2022).

The Oroville Veterans Memorial Building was constructed in the early 1930s at 2374 Montgomery Street. It is home to Veterans Foreign War Post 1741 and American Legion Post 95. It is a large side-gabled brick building with a rather utilitarian appearance, apart from a neo-classical stone-built entrance with three arches leading to a set of three doors. The incorporation of three large arches into the entrance recalls similar arrangements at the Gridley Veterans Memorial Building and the Chico Veterans Memorial Building.

The Paradise Veterans Hall was constructed prior to 1948 at 6550 Skyway. It was likely constructed in 1946 or 1947, after the cessation of hostilities, and as part of the second nationwide boom in veteran hall construction.

The building is home to Veterans Foreign War Post 2039 and American Legion Post 259. It is a large and low cross-gabled building, reminiscent of a World War II barracks building. The most recent example in Butte County is the Durham Veterans Memorial Hall, which was constructed in 1957 at 9319 Midway. It is home to the American Legion Post 673, although it has been owned and operated by the Durham Recreation and Park District since 1992. The building is a large side-gabled hall surrounded by a single-story flat-roofed section that wraps around two sides of the building. It has the appearance of a Mid-century school building.

Around the country, individual examples of Veterans Memorial Buildings have been nominated under various combinations of criteria A and C, but arguments typically reflect the unique histories and characteristics of the individual buildings. The Montana Veterans and Pioneers Memorial Building (04001357; constructed 1953) in Helena, Montana, was nominated under Criterion A, for its association with the history of art and education in Montana, and under Criterion C as an excellent example of the International architectural style (Hampton 2003:5). The Veterans of Foreign Wars Hall (908000511; constructed 1946) in Reno, Nevada, was nominated under Criterion A, for its association with social history and entertainment/recreation (James 2008: Section 8, Page 2). The Legion Memorial Building (94000299) in American Fork City, Utah, was constructed in 1917 as a machinist shop. The building was remodeled for use as a memorial hall between 1932 and 1934 with funding from the Civil Works Administration, American Fork City, and the American Legion. It was nominated under Criterion A, for its significance as an American Legion Hall and war memorial, and for its well-preserved post-renovation Art Deco architecture, identified as Public Works Administration Moderne, with a caveat about its age. The original history and form of the building were not identified as significant (Westwood 1993:6).

In California five veterans memorial buildings have been nominated for the National Register of Historic Places (National Register) and thus the automatically eligible for the California Register. The Truckee Veterans Memorial Building (100006720; constructed 1939) in Truckee, Nevada County, was nominated under Criterion A, for its importance to local social history, as a prominent building used as a meeting place, a gathering space for social events, a shooting range, and an emergency disaster staging and training area, that was fitted with a siren. It was also nominated under Criterion C, as an important example of an unusual architectural approach, where architect George C. Sellon utilized a gothic arched ribbed frame to create the large internal open space (Marvin et al. 2020:10-13). The Santa Cruz Veterans Memorial Building (92000423; constructed 1931-1932) in Santa Cruz, Santa Cruz County, was also nominated for the National Register under Criterion A, for its social history relating to the development of veterans organizations following World War I, and under Criterion C, as an outstanding example of the Spanish Colonial Revival architectural style (Coats et al. 1989:Section 8). The San Diego Veterans' War Memorial Building (00001167; constructed 1950) in San Diego, San Diego County, was nominated under Criterion A, for its association with the national 'Living Memorial Movement' and for its ongoing use by the local community as a public space (Bevil 2000: Section 8). The Alameda Veterans Memorial Building (07000995; constructed 1929) in Alameda, Alameda County, was nominated under Criterion C, as a good example of the Moderne/Deco architectural style and its association with the important local architect Henry H. Meyers (Sweeny 2007; Section 8, Page 11). The Santa Barbara Veterans Memorial Building (16000097; constructed 1935) is listed on the National Register, but the nomination form is not available online and it is unclear under which criteria it was nominated. The building is an excellent example of the Spanish Colonial Revival style and has clear significance to social history.

7 Field Methodology

On July 3, 2024, Stuart Rathbone, NCE Staff Architectural Historian and Archaeologist, conducted a cultural resources inventory of the Gridley Veterans Memorial Building on parcel APN 010-170-001, the Butte County Offices and Court Building on parcels APN 010-170-001 and APN 010-170-020, and the accessory resources and landscaping located within the Project area. Dr. Rathbone checked all exposed ground surfaces for archaeological artifacts, features, and deposits. NCE prepared DPR Forms for the Gridley Veterans Memorial Building and the Butte County Offices and Court Building and undertook eligibility evaluations for the National Register and the California Register.

7.1 Expectations

Archival research suggested that the Project area was fully developed and that undisturbed soils with visible prehistoric artifacts, features, or deposits would not be present. It was considered possible that historic archaeological features, in the form of building foundations and pads might be visible within the graveled parking lot areas. It was anticipated that the Project area would contain two primary buildings, the Gridley Veterans Memorial Building and the Butte County Offices and Court Building. Archival research did not clarify if these two buildings had maintained a clear separation or if they were conjoined. It was anticipated that a number of large secondary architectural resources would be present in the Project area, including a number of sheds, and that smaller secondary architectural resources, such as monument signs, memorials, and flagpoles would be located across the Project area.

7.2 Inventory Areas and Field Methods

The objective of the investigation was to locate, describe, and evaluate cultural resources within or adjacent to the APE. Fieldwork within the Project area was performed in accordance with state (14 CCR § 15064.5) and federal (Advisory Council on Historic Preservation 2009) standards.

A pedestrian survey was conducted across the graveled parking lot and lawn areas using approximately 15-meter transects to identify archaeological resources. If cultural resources had been encountered, field personnel would have more thoroughly examined the immediate area to determine the type and extent of cultural material. Archaeological components including diagnostic artifacts, artifact concentrations, and features would have been described in field notebooks, photographed using a high-quality camera, and plotted using the ESRI Collector mobile application. If sites had been identified, at least two overview photographs would have been taken per site to capture the general surroundings with attention paid to capturing the horizon (if possible) to aid in potential future relocation. If applicable, photographs of artifacts would contain a scale. Upon completion of the inventory, field data GIS shapefiles would have been created and projected to California State Plane Zone 3 (North American Datum 83). No artifacts would have been collected during the field survey.

Architectural resources were recorded after a detailed visual inspection had occurred. Photographs were taken with a high-quality camera of the front façade, side walls, and rear walls of each building or structure, as well as oblique photographs of each corner, and detailed shots depicting important architectural details. A detailed written description was recorded in a field notebook. California Department of Parks and Recreation (DPR) site forms were prepared as necessary for each resource identified during the inventory, and their locations were plotted on a USGS 7.5-minute map. A detailed photo log is provided in **Appendix D**.

7.3 Professional Qualifications

Stuart Rathbone, Ph.D., conducted the cultural resources inventory and performed form preparation and mapping tasks. Dr Rathbone also served as Project Manager. Dr. Rathbone was assisted by Ms. Gena Pennanen. She assisted the records search, tribal consultation, and mapping tasks. Charles Zeier, M.A., reviewed the report.

Dr. Rathbone and Mr. Zeier meet the Secretary of the Interior's Professional Qualification Standards for Archaeology. Dr. Rathbone meets the Secretary of the Interior's Professional Qualification Standards for Architectural History. Ms. Pennanen is a staff archaeologist with experience conducting archaeological inventories and preparing detailed site records.

8 Inventory Results

8.1 Identified Archaeological Resources

No archaeological resources were identified by NCE during the cultural resources inventory. Ground surfaces within the Project area consist of paved surfaces, graveled surfaces, and lawn areas.

8.2 Identified Architectural Resources

Two primary architectural resources were identified within the Project area, both of which had smaller associated resources. A resource location map is provided in **Appendix E**. DPR forms for the two buildings are included in **Appendix F**.

8.2.1 The Gridley Veterans Memorial Building

The Gridley Veterans Memorial Building is a large, complex building with a T-shaped plan located within parcel APN 010-170-001.. The front façade at the north faces Sycamore Street. It consists of a main two-story central mass, with single-story sections running along the two side walls, a one-and-a-half story entrance section extending from the northern wall, and two rectangular masses extending the width of the front façade to the east and west. The walls of the building are clad with stucco. The main mass is covered by a hip-truss roof, and the other original sections are covered by flat roofs. A small addition was constructed on the eastern side of the building that contains a kitchen. The addition connects to the southern wall of the eastern rectangular mass and the eastern wall of the single-story section running along the eastern side of the main mass. The addition is covered by a steeply sloping roof and contains an extension to the original kitchen.

The Veterans Memorial Building was constructed in 1926. It presents a curious mixture of styles, with the main mass resembling a large industrial building. The use of factory sash windows and metal loading bay doors enhances the industrial style of the building. In contrast, the front façade has clear neo-classical influences, with a monumental entrance and decorative elements including Doric pilasters and rows of dentils. Bright terracotta tiles run along the edges of the flat roof sections at the north of the building, providing a level of Spanish influence.

A formal landscaped area is to the north, with a symmetrical curving driveway, lawn areas, and a wide pathway leading directly to the main entrance from Sycamore Street. To the northeast is a large lawn. Parking lots are located to the east and west of the building. Two sheds and a shipping container are located around the perimeter of the eastern parking lot.

The front façade of the Veterans Memorial Building consists of the northern wall of the one-and-a-half-story entrance section, and the northern walls of the eastern and western rectangular masses. The entrance features three doors set within arched-topped doorways. The doors are identical aluminum framed glass doors, each with an aluminum framed sidelight to the west. Above the doors, the arches are infilled with plain panels. The current arrangement of doors and panels filling the doorways is clearly not original and likely dates from the late 20th century or early 2000s. The design of the original doors is not known. The doors open onto a wide concrete deck which is accessed by three concrete steps with four metal handrails. A sloping concrete ramp provides access to the deck from the west. The three doorways are framed by four Doric-style pilasters That support a simple entablature consisting of a frieze with five dentils located between each pilaster. The frieze features four small square decorative panels, with a star-in-a-wreath motif. Veterans Memorial Building is spelled out in

dimensional letters. The entrance is flanked by two octagonal towers. The towers are rather plain, but a memorial plaque is embedded into each tower. The tops of the towers feature decorative horizontal trim, above which are alternating panels with an eagle holding a shield and a shield surrounded by scrolls or ribbons. A sloping section of roof runs between the two towers, supported by a row of dentals and covered with terracotta roof tiles.

The front façade continues along the northern walls of the western and eastern rectangular masses. The northern wall of the western rectangular mass features three regularly spaced windows with 24-light, metal-framed factory sash windows. The windows are divided into four panels, with two eight-light casement-opening panels at the bottom, and two four-light fixed panels at the top. The upper panels are covered by decorative metalwork bars. At the east of the wall is an original metal drainpipe, and at the west is a shallow, plain pilaster. The top of the wall features a row of dentils, which connect to the pilaster at the west. Above the dentils is a sloping section of roof covered with terracotta roof tiles. The northern wall of the eastern rectangular mass is a mirror image of the northern wall of the western mass.

The western side of the building consists of the western and southern walls of the western rectangular mass, the western wall of the single-story section running along the western side of the main mass, and the western wall of the main mass visible above the single-story section. The western wall of the western rectangular mass features a 24-light, metal-framed factory sash window at the north and two small single fixed-light windows at the south. Shallow plain pilasters are at the north and south of the wall, with their tops connected by a row of dentils. Above the dentils is a sloping section of roof covered with terracotta roof tiles. The southern wall of the western rectangular mass features two 12-light metal-framed factory sash windows, consisting of two six-light casement-opening panels. The wall is otherwise plain, apart from a scar at the west where an original metal drainpipe was removed. At the top of the wall is a sloping section of roof covered with terracotta roof tiles. The western wall of the single-story section features a row of eight regularly spaced nine-light metal-framed factory sash windows. The windows are divided into two panels, a three-light panel at the bottom, and a six-light panel at the top, but the method of opening is not apparent. Original metal drainpipes are located at either end of the row of eight windows. South of the row of windows is a set of plain metal double doors that open onto a concrete loading dock. The dock has a long concrete access ramp added to its northern side. The edges of the dock and the ramp are protected by stout metal railings. On the wall south of the dock is a nine-light metal-framed factory sash window, and two smaller six-light metal-framed casement opening, factory sash windows. A chimney is located at the northwestern corner of the western wall of the main mass. South of the chimney is a six-light metal-framed factory sash window and a row of five regularly spaced 16-light metal-framed factory sash windows. South of the row of windows is an eight-light metal-framed factory sash window. These upper windows have been painted over.

The eastern side of the building consists of the eastern and southern walls of the eastern rectangular mass, the eastern wall of the single-story section running along the eastern side of the main mass, and the eastern wall of the main mass visible above the single-story section. The eastern wall of the eastern rectangular mass was difficult to observe because of the tight space between it and the adjacent Butte County Offices and Court Building. It features two small metal-framed factory sash windows in the center, and a smaller opening at the south filled by an air conditioning (AC) unit. A shallow plain pilaster is at the south of the wall, connected to the end of a row of dentils. Above the dentils is a sloping section of roof covered with terracotta roof tiles. The southern wall of the eastern rectangular mass is concealed by the sloping roof addition. The eastern wall of the addition features a three-light metal-framed window with the outer lights being casement-opening windows.

The southern wall of the addition features a flush metal door at the west, set below a three-light metal-framed factory sash window. The door opens onto a small concrete stoop with three steps to the east. A metal handrail runs along the southern edge of the stoop and steps. The single-story section south of the addition features a row of five regularly spaced nine-light metal-framed factory sash windows. The windows are divided into two panels, a three-light panel at the bottom, and a six-light panel at the top, but the method of opening is not apparent. South of the row of windows is a set of plain metal double doors that open onto a concrete loading dock. The edges of the dock have stout metal railings. On the wall south of the dock is a nine-light metal-framed factory sash window, and two smaller six-light metal-framed casement opening, factory sash windows. A large electrical panel is located on the wall below the southernmost window. The eastern wall of the main mass features a six-light metal-framed factory sash window at the north, then a row of five regularly spaced 16-light metal-framed factory sash windows, and south of these is an eight-light metal-framed factory sash window. A square patterned piece of decorative trim runs along the wall above the windows. These upper windows have been painted over.

The southern wall of the building consists of the southern ends of the single-story sections and the southern wall of the main mass. The southern walls of the single-story sections are plain. In the center of the southern wall of the main mass is a large metal eight-panel arched-top double door, set approximately three feet above the ground surface. Clearly this door has lost a loading dock or a set of steps, and it is no longer accessible. A small flush metal door is located immediately below the larger door, in a very awkward fashion. The arched metal door is flanked on either side by pairs of six-light metal-framed casement-opening factory sash windows. Between the door and the innermost windows are original metal drainpipes.

The western and eastern rectangular masses, the area above the entrance, and the single-story sections along the western and eastern side walls of the main mass have simple flat roofs. They are covered with rolled roofing material and feature various AC units and metal ducting. The main mass has a more complicated hip-truss design, with gently sloping sections around the edges and a flat central section. The roof is covered with rolled roofing material and six AC units are mounted to the flat central section.

The interior of the Veterans Memorial Building consists of distinct areas. The entrance foyer is an open space that contains a museum style display of militaria on the western wall, the entrances to two small rooms, likely offices, on the eastern wall, and three doors that lead into the main hall on the southern wall. Passageways connect the foyer to the eastern and western masses. The eastern mass contains a meeting room and a kitchen, and the western mass contains restrooms. The main mass contains a large open hall, which extends into the flat roofed single-story masses that run along the sides of the main mass. Square columns support the roof of the main mass and there are no internal walls dividing it from the side masses. A raised stage with a proscenium arch is located at the southern end of the hall, and the ends of the side masses contain toilets and service areas. The hall has a plastered ceiling, and the roof trusses are not visible. The interior of the building appears to have been modernized in the late 20th century, and 1920s interior details are lacking, other than the proscenium arch in front of the stage and a few trim details.

The steps on the front façade descend to a wide paved driveway that curves away to the northeast and northwest to connect to Sycamore Street. The driveway encloses a semi-circular lawn area, with a row of mature trees along the northern edge, adjacent to Sycamore Street. A wide concrete pathway runs through the middle of the lawn, leading southwards from Sycamore Street towards the entrance. A flagpole is in the middle of the pathway. The flagpole is topped by a finial consisting of a sculpture of an eagle in flight. To either side of the flagpole, in the lawn areas, are two small field guns, used as monuments. To the east of the flagpole is a 3-

inch M1902 field gun, used by the United States Army between 1902 and 1919. To the west of the flagpole is a World War II era 37mm gun M3 anti-tank gun. Along the northern edge of the crescent shaped lawn is a concrete bench and a trash can. A small lawn area is to the northwest of the driveway, which features a small ground-level monument sign with moveable lettering at the northwest corner of the lawn. A large simple lawn area is to the east of the driveway consisting of parcels APN 010-170-019 and APN 010-170-003. The parking lots to the west and east of the building are simple gravel surfaces.

8.2.2 The Butte County Offices and Court Building

The Butte County Offices and Court Building has a simple rectangular plan, with its long axis aligned east to west and the front façade is at the north, facing Sycamore Street. The inset entrance is located to the west of the midpoint. The front door is set within a large aluminum-framed panel. The front door is a double glass door set below a transom light and flanked by large two-light sidelights. The walls of the entrance are clad with textured stucco. A dedication plaque is mounted to the wall to the east of the door. The rest of the front façade is plain. The eastern side wall is plain apart from a flush wooden door at the northern corner. The rear wall at the south features three widely spaced flush wooden doors. The central door is flanked by two large louvered ventilation panels. The eastern side wall could not be observed. The walls of the building are mostly clad with large plywood panels with battens covering the seams. Areas to either side of the entrance are clad with textured stucco. The building has large, boxed eaves on all sides, the outer faces of which are clad with textured stucco, and the undersides are clad with wooden or plywood panels. The flat roof is covered with rolled roofing material and features several large AC units. A shallow lean-to addition was built against the rear wall between the central door and the eastern door. The addition has a gently sloping shed roof and no external doors or windows. The addition is clad with the same plywood panels as the main mass, with battens used to conceal the seams. The roof of the addition has short, boxed eaves and is covered with rolled roofing materials.

The parking lots to the west and east of the building are simple gravel surfaces. A shipping container and two sheds are located around the perimeter of the eastern parking lot. At the eastern edge of the eastern parking lot is a large front-gabled shed with its front façade at the west. It is clad with corrugated metal sheeting and has two double doors on the western gable wall. The gently sloping roof has short overhanging eaves with fascia boards and barge boards and is covered with corrugated metal sheets. In the southeast corner of the eastern parking lot is a small front-gabled wooden shed with its front façade at the west. The shed is clad with plywood panels and a flush wooden door on the western gable wall. The moderately sloping roof has short overhanging open eaves and is covered with standing seam metal sheeting. The shed has suffered from fire damage. A 40-foot shipping container is positioned along the southern side of the eastern parking lot. It is apparently an unmodified shipping container, other than having a rotating metal vent on its roof.

9 Eligibility Recommendations

A key component of an intensive inventory is the development of recommendations as to whether identified cultural resources are eligible for listing on various registers of historic places. Eligibility is based on consideration of site significance and integrity. The significance of a cultural resource is evaluated in accordance with standards set by federal, state, and local entities. Federal standards are defined in the National Register, specifically in 36 CFR 60.4. California standards are prescribed as part of the CEQA under PRC 5024.1 (Butte County 2023:5.5-1 – 5.5.-3).

9.1 National Register Criteria Overview

The National Register eligibility criteria indicate a property must be at least 50 years old and fairly unaltered, and must meet one or more of the following National Register significance criteria:

- A. Event:** Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B. Person:** Property is associated with the lives of persons significant in our past.
- C. Design/Construction:** Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- D. Information Potential:** Property has yielded, or is likely to yield, information important in prehistory or history.

To be considered eligible under Criterion A, a property must be associated with events that are important within a defined context. A prehistoric site that exemplifies an adaptive trend associated with a distinctive cultural period (described under Cultural Settings above) might be considered eligible under Criterion A. An ethnographic-period site that is an outstanding example of changing lifeways and Native adaptation might also be considered significant. Likewise, a historic-period site that is considered eligible should represent an important contribution to an event within the associated context.

Criterion B applies to properties associated with individuals whose specific contributions to history can be identified and documented. As such, Criterion B usually applies to ethnohistoric- and historic-period sites because prehistoric sites generally lack associations with known individuals.

Criterion C applies to properties that embody distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic value, or represent a significant and distinguishable entity within a larger "district." Prehistoric site types that meet Criterion C are generally distinctive site types that reflect elements of community design or contribute to larger districts as key elements within a regional land-use context.

Criterion D pertains to the information a property may contribute toward our understanding of prehistory or history. Research topics or themes presented in a historic context are the mechanisms by which properties are evaluated against Criterion D.

9.1.1 Integrity

For a resource to be listed in the National Register, it must not only demonstrate its significance based on 1 or more National Register eligibility criteria but must also have the integrity to convey such significance. The evaluation of site integrity, or the extent to which potential information is preserved in contexts that are sufficiently intact, must always be grounded in an understanding of a resource's physical features and how they relate to its significance. To retain integrity, a resource must possess at least several aspects of integrity, including location, design, setting, materials, workmanship, feeling, and association.

1. **Location:** The place where the historic property was constructed or the place where the historic event occurred.
2. **Design:** The combination of elements that create the form, plan, space, structure, and style of a property.
3. **Setting:** The physical environment of a historic property.
4. **Materials:** The physical elements that were combined or deposited during a particular period and in a particular pattern or configuration to form a historic property.
5. **Workmanship:** The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
6. **Feeling:** A property's expression of the aesthetic or historic sense of a particular period.
7. **Association:** The direct link between an important historic event or person and a historic property.

9.2 California Environmental Quality Act

The CEQA requires that, for projects financed by or requiring the discretionary approval of public agencies in California, the effects of the project on Historical Resources be considered (PRC Section 21083.2). Historical Resources are defined for CEQA purposes as “buildings, sites, structures, or objects, each of which may have historical, architectural, archaeological, cultural, or scientific importance” (PRC Section 50201).

Under the CEQA Guidelines, an effect is considered significant if a project will result in a substantial adverse change to the resource (PRC Section 21084.1). Actions that would cause a substantial adverse change to a historical resource include demolition, replacement, substantial alteration, and relocation. Before the significance of impacts can be determined and mitigation measures developed, the significance of cultural resources must be determined. The 2000 CEQA Guidelines (Section 15064.5) define four cases in which a property may qualify as a significant historical resource for CEQA review. The explanation of these criteria follows the National Register criteria (A, B, C, and D) defined above, but pertains to resources of local or state levels of significance rather than national levels of significance.

- A. The resource is listed in or determined eligible for the listing in the California Register. Section 5024.1 defines eligibility requirements and states that a resource may be eligible for inclusion in the California Register if it:
 1. **Event:** Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
 2. **Person:** Is associated with the lives of persons important in our past.

3. **Design/Construction:** Embodies the distinctive characteristics of a type, period, region, or method of construction, represents the work of an important creative individual, or possesses high artistic value.
4. **Information Potential:** Has yielded, or may be likely to yield, information important in prehistory or history.

Properties that are listed in or eligible for listing in the National Register are automatically considered eligible for listing in the California Register, and thus are significant historical resources for CEQA (Public Resources Code Section 5024.1[d][1]).

- B. The resource is included in a local register of historic resources, as defined in Section 5020.1(k) of the Public Resources Code, or is identified as significant in a historical resources survey that meets the requirements of Section 5024.1(g) of the Public Resources Code (unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant).
- C. The lead agency determines the resource to be significant as supported by substantial evidence considering the whole record.
- D. The lead agency determines that the resource may be a historical resource as defined in Public Resources Code Section 5020.1(j) or 5024.1.

A substantial adverse change to a historical resource is considered a significant effect on the environment under CEQA. When it is determined that a project may cause a substantial adverse change, alternative plans, or measures to mitigate impacts to the resource must be considered.

9.3 Project Resource Eligibility Recommendations

A total of two resources were evaluated for the California Register as part of this study.

9.3.1 Resource # – The Gridley Veterans Memorial Building

The Gridley Veterans Memorial Building is a large and complex building constructed in 1926. The elaborate front façade of the building features Italianate decorations and provides a suitably impressive visual statement to people passing along or approaching from Sycamore Street. Beyond the front façade the building has a rather utilitarian appearance, resembling an early 20th century large industrial or military building, or a school gymnasium. The Gridley Veterans Memorial Building is a well-preserved example of a class of specialized building that has been found eligible for the National Register and the California Register under Criterion A/1, Criterion C/3, or both.

NCE recommends that the Gridley Veterans Memorial Building is eligible under Criterion A/1, for its social history relating to the development of veteran's organizations following World War I, and the ongoing efforts to provide services to veterans throughout the 20th century. The Gridley Veterans Memorial Building is not known to be associated with any individual people important to history. NCE recommends that Gridley Veterans Memorial Building is not eligible under Criterion B/2. The architect of the Gridley Veterans Memorial Building has not been identified, although the possibility has been discussed that Chico-based architects Chester Cole and L. L. Brouhard may have been involved. Despite this uncertainty, the building is an excellent example of a 1920s Veterans Memorial Hall. The finely detailed façade provides a stark contrast with the more utilitarian halls constructed in the aftermath of World War II. The industrial style masses behind the front façade are unusually

intact examples of a building style typically found to have been subject to substantial modification. The combination of a monumental façade with industrial style masses is an unusual design and marks this building as distinct from the other nearby examples in Chico and Oroville. NCE recommends that the Gridley Veterans Memorial Building is eligible under Criterion C/3 as an example of an important specialized type of building constructed in a novel fashion. Further study of the Gridley Veterans Memorial Building is unlikely to provide additional information important to answering research questions. NCE recommends that Gridley Veterans Memorial Building is not eligible under Criterion D/4.

The Gridley Veterans Memorial Building has an elevated level of integrity. The most notable changes to the exterior of the building are the replacement of the three main doors on the front façade. The loss of what were presumably elaborate wooden doors does diminish the integrity of the building, but the survival of the details of the surrounding façade means that the appearance of the front façade is largely intact. The small addition to the eastern side of the building is not visible from the approach along Sycamore Street and does little to diminish the overall appearance of the building. The interior of the building has been modernized, but the original floor plan appears to be largely intact. The main hall appears to be largely intact, and the focal point of the hall, the stage with its proscenium arch, has survived allowing the hall to convey a sense of its original appearance and purpose.

The Gridley Veterans Memorial Building has retained integrity of location, design, materials, workmanship, feeling, setting, and association. The loss of the original main doors and the changes to the interior has resulted in some loss of design, materials, and workmanship, but not to the extent that the building feels compromised.

9.3.2 Resource # – The Butte County Offices and Court Building

The Butte County Offices and Court Building is a small mid-20th century office building constructed in 1967. The building lacks historic or architectural significance. The Butte County Offices and Court Building is not known to be associated with events or people important to our history and is not recommended as being eligible for the National Register or the California Register under Criteria A/1 or B/2. Although the building has an elevated level of integrity, it is a very plain and utilitarian building that lacks architectural importance. The Butte County Offices and Court Building is not recommended as being eligible for the National Register or the California Register under Criteria C/3. Further study of the Butte County Offices and Court Building is unlikely to provide information important for answering research questions. The Butte County Offices and Court Building is not recommended as being eligible for the National Register or the California Register under Criteria D/4.

9.4 Potential Historic Districts

The area surrounding the Veteran's Memorial Hall and the County Building consists of two potential historic districts. Haskell Street to the immediate west of the Veterans Memorial Building marks the eastern edge of the original historic core of Gridley, an area that is seven by five blocks, defined by Haskell Street at the northeast, Vermont Street at the southwest, Spruce Street at the northwest, and Cedar Street at the southeast. The historic core is aligned northwest to southeast, and northeast to southwest. The historic core is arranged around two separate transportation corridors; Sycamore Street is the main road running northeast to southwest through the center of the historic core, and the Southern Pacific Railroad line runs northwest to Southeast through the center of the historic core. The historic core of Gridley has not been formally assessed as a Historic District, and such an effort lies beyond the scope of the current study. The historic core of Gridley retains historic-age commercial, municipal, and residential buildings, but loss of resources through fire, dereliction, and extensive

redevelopment is a noted problem. However, the surviving resources can convey a sense of the early history of Gridley, with distinct commercial, industrial, and residential areas. Only one resource within the historic core of Gridley has been listed on the National Register, the Hazel Hotel (NRIS Reference Number: 01000705) at the intersection of Hazel Street and Kentucky Street (Connerley 1997). The Historic core of Gridley is depicted on the 1888 and 1895 USGS topographic maps. The historic district has not been evaluated for the National Register or the California Register, but a preliminary assessment suggests it would likely meet the requirements for eligibility under Criteria A/1, B/2, and C/3.

The 1912 USGS topographic map shows that the core had expanded slightly to the north, east, and west. The expansion areas are aligned north-south to east-west, marking a clear distinction from the original historic core. According to the staff of the Gridley Museum, these additions relate to the influx of Mormon settlers to the area during the early 20th century. The 1952 USGS topographic map shows major expansions to the north and west of the historic core, but only a small expansion to the east, where Woodrow Wilson School had been developed. Between 1952 and the present there has been a small amount of additional expansion to the north, east, and southwest.

The Gridley Veterans Memorial Building lies at the western edge of the small eastern addition to the historic core, defined by Haskell Street at the west, State Highway 99 to the east, Spruce Street to the north, and Gridley Street to the south. The addition is largely residential in nature, but a concentration of commercial buildings and small strip malls lies adjacent to State Highway 99. Houses adjacent to the Veterans Memorial Building date from between 1912 and 1947, and represent an array of early 20th century styles, including craftsmen, minimal traditional, and early ranch styles. The buildings lack a cohesive sense of a particular period, and they are a mishmash of assorted styles. As individual resources, the buildings lack distinction. The historic district has not been evaluated for the National Register or the California Register, but a preliminary assessment suggests it likely would not meet the requirements for eligibility under any of the criteria.

10 Management Summary

Butte County proposes to undertake the Gridley Behavioral Health Services Facility Project (Project) located on four parcels at 267 Sycamore Street, Gridley, Butte County, CA. The Project consists of two distinct elements, rationalizing the current arrangement of parcels and constructing a new building within one of the open space areas. The approximately 2.35-acre Project area consists of four adjacent parcels with individual Assessor Parcel Numbers (APN); APN 010-170-001; APN 010-170-019; APN 010-170-003; APN 010-170-020. One of the parcel boundary lines runs through the middle of the Butte County Offices and Court Building. The proposed Project would combine the existing parcels to remove the conflict. A new 10,000 to 14,000 SF one-story Behavioral Health Center (BHC) would be constructed in one of the open space areas.

The Project area contains the Gridley Veteran's Memorial Hall, the Butte County Offices and Court Building, areas of landscaped open space, a parking lot, two sheds, a shipping container, and a variety of monuments. NCE conducted an intensive cultural resources inventory of the Project area to locate, describe, and evaluate cultural resources.

NCE conducted a cultural resources inventory of the APE on July 3, 2024. NCE did not locate any archaeological resources within the Project area. NCE recorded two primary architectural resources within the Project area, each of which had associated resources. The Project area lies adjacent to one potential historic district, the historic core of Gridley, and lies within a second potential historic district, a small early 20th century addition to the historic core of Gridley. NCE evaluated the two primary architectural resources for National Register and California Register eligibility and provided preliminary assessments of the potential historic districts.

10.1 Summary

NCE did not locate archaeological resources within the Project area.

NCE recorded two primary architectural resources within the Project area, each of which had associated resources. The Project area lies within one potential historic district and lies adjacent to a second potential historic district. NCE recommends the Gridley Veterans Memorial Building as eligible for the National Register and the California Register under Criteria A/1 and C/3. NCE recommends that the Butte County Offices and Court Building is not eligible for the California Register under any of the criteria. NCE identified that the historic core of Gridley has potential as a historic district under Criteria 1, 2, and 3. The Project area lies within a small early 20th century addition to the eastern edge of the historic core of Gridley. NCE did not identify any characteristics of this area that would suggest it was eligible for either the California Register.

10.2 Determination of Effect

The proposed rationalization of the four parcels within the Project area is an administrative action. It will have no effect that would impact either known or unknown cultural resources located within the Project area.

The NEIC records search did not identify any previously recorded archaeological resources within the Project area. NCE did not identify any previously unrecorded archaeological resources within the Project area. There is a possibility that buried archaeological artifacts, features, or deposits may be encountered during the construction of the foundations of the proposed BHC at the northeast of the Project area.

The proposed construction of the BHC will not physically impact either the Butte County Offices and Court Building or the Gridley Veterans Memorial Building. The proposed construction of the BHC will have a visual

impact on existing architectural resources within the Project area. NCE recommend that the visual impacts to the Butte County Offices and Court Building would not constitute an adverse effect to a historic property, because the building is recommended as not being eligible for the National Register or the California Register. NCE recommends that the visual impacts to the Gridley Veterans Memorial Building will not constitute an adverse effect on a historic property, despite NCE recommending that the building is eligible for the National Register and the California Register under Criteria A/1 and C/3. The proposed BHC is a small, single-story building that would be located at least 165-feet (50 meters) northeast of the Gridley Veterans Memorial Building and will be screened by an existing row of mature trees that line the eastern side of the driveway that leads to the buildings entrance. The view from the Gridley Veterans Memorial Building to the northeast has already been compromised by the construction of the Butte County Offices and Court Building in 1967. Due to its small size the proposed BHC means would not represent a significant alteration to the views to or from the Gridley Veterans Memorial Building.

Based on these considerations, it is recommended that the Project will have no effect on archaeological or architectural resources designated as historic properties and meets the definition of “no historic properties affected,” as that term is defined in 36 CFR Part 800.4(d)(1), and will not cause a substantial adverse change in the significance of an historical resource, as that term is defined in PRC 5024.1 and CEQA Guidelines Section 15064.5(b)(3).

10.3 Other Considerations

Every reasonable effort was made to identify cultural resources within or adjacent to the APE. If prehistoric or historic period resources are subsequently discovered that could be adversely affected by Project-related activities, all such activities should cease immediately. Butte County and appropriate tribal representatives should be contacted immediately.

Prehistoric burials might be found in the APE (none were apparent based on an examination of the ground surface). In the event human remains are discovered, all work shall cease immediately, and all measures shall be made to secure and protect areas in which human remains, and funeral objects are discovered. No photographs of human remains, or funeral objects will be permitted by construction workers and/or contract or subcontractors on the job site. In the event human remains are discovered, the coroner and law enforcement agency with jurisdiction shall be notified within 24 hours of the discovery to evaluate the find and determine whether it is a crime scene or a burial and treat the remains. If human remains are determined to be associated with an archaeological site (burial), the State Historic Preservation Office will be notified. Butte County will work with the State Historic Preservation Office to determine what measures to take. That office will contact the appropriate tribal representatives and consult on the disposition of the remains and any associated artifacts.

NCE prepared this report for use by Butte as the intended beneficiary of this work. Interpretations, conclusions, and recommendations contained within the report are based in part on the information presented in other reports that are cited in the text and listed in the references. This report is subject to limitations and qualifications inherent to the referenced documents.

11 References

Advisory Council on Historic Preservation (ACHP)

2019 *Recent Court Decision Regarding the Meaning of "Direct" in Sections 106 and 110(f) of the National Historic Preservation Act*. Memorandum to ACHP Staff from the ACHP Office of General Counsel.

Bevil, A. D.

2000 *National Register of Historic Places Registration Form. San Diego Veterans' War Memorial Building, Balboa Park*. Form on file with the National Parks Service.

Butte County

2023 *Draft Environmental Impact Report*. Electronic document accessed 12/12/2023/
<https://www.buttecounty.net/367/Butte-County-General-Plan-2040>

Cahill, B. J. S.

1931 Some Recent School and Other Work by Chester Cole and L. L. Brouchard. *The Architect and Engineer*, Volume 107 (1).

Carnegie-libraries.org

2009 *Gridley, Butte County. Sacramento Valley area, Shasta Cascade region. Carnegie Library Building, 519 Kentucky Street, Gridley, CA 95966*. Electronic document accessed 12/6/2024.
<https://www.carnegie-libraries.org/california/gridley.html>

Connerley, J. S.

1997 *National Register of Historic Places Registration Form. The Hazel Hotel, Gridley*. Form on file with the National Parks Service.

Coats, P., R. Gibson, C. Mathews, N. Ryan

1989 *National Register of Historic Places Registration Form. Veterans Memorial Building, Santa Cruz*. Form on file with the National Parks Service.

Gridley Reunion Committee

1980 *History of the L.D.S. Church in the Gridley, California Area*. Gridley, CA. McDowell Printing.

Hampton

2003 *National Register of Historic Places Registration Form. Montana Veterans and Pioneers Memorial Building*. Form on file with the National Parks Service.

Irrigated Land Company of California

1908 *Sunset Gridley Colonies. Money Making Little Farms: For the Farmer, Wage Earner, or Investor*. San Francisco, CA. Irrigated Land Company of California.

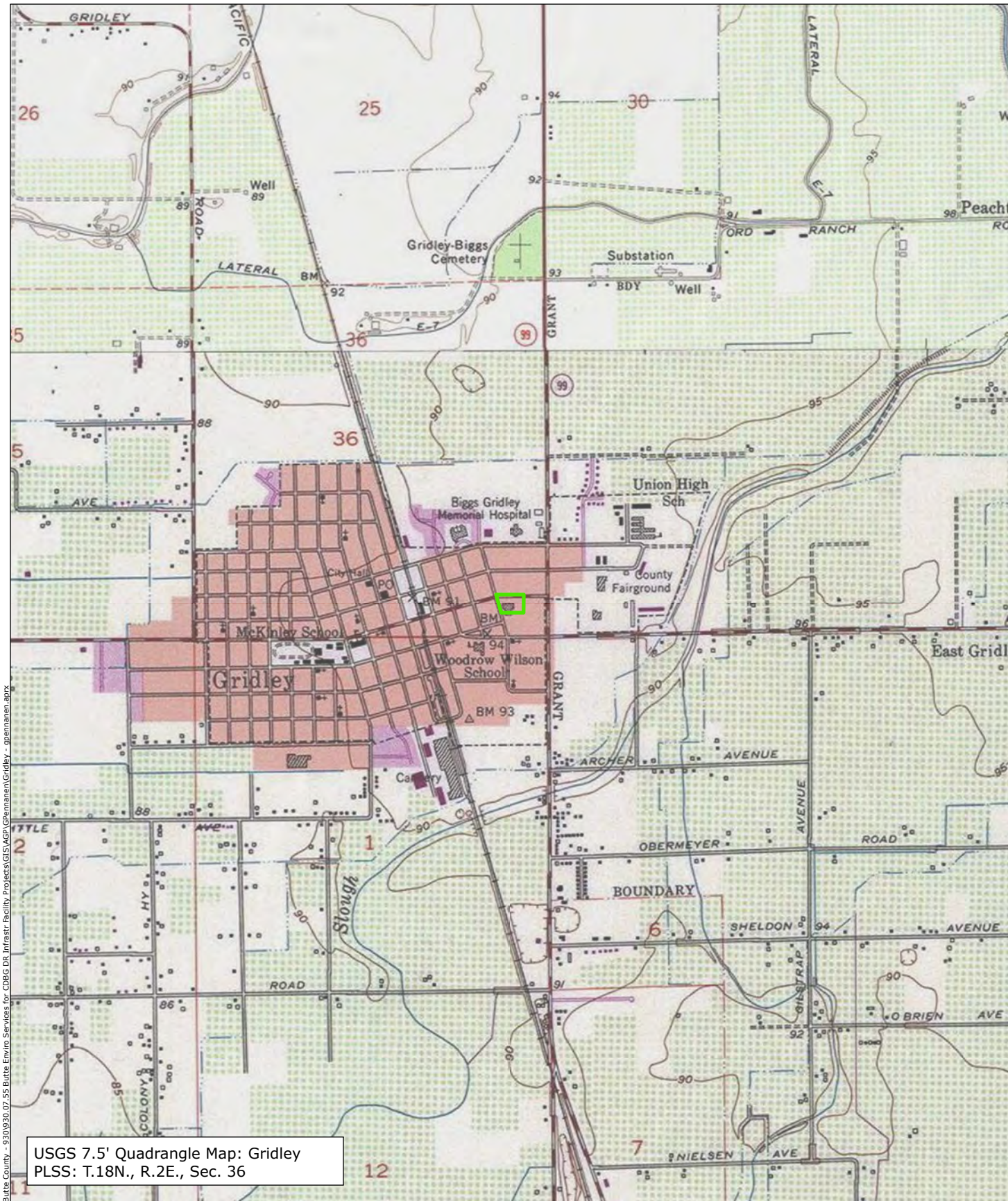
James, R. M.

References

- 2008 *National Register of Historic Places Registration Form. Veterans of Foreign War Building, Reno*. Form on file with the National Parks Service.
- King, R., and L. Van De Hey
2015 *Gridley*. Charleston, SC. Arcadia Publishing.
- Langley, H. G.
1875 *Pacific Coast Business Directory for 1876-1878*. San Francisco, CA: Henry G. Langley, Publisher
- McKenny & Co
1880 *Pacific Coast Directory for 1880-81*. San Francisco, CA: L. M. McKenny & Co., Publishers.
1882 *Pacific Coast Directory for 1893-84*. San Francisco, CA: L. M. McKenny & Co., Publishers.
1886 *Pacific Coast Directory for 1886-87*. San Francisco, CA: L. M. McKenny & Co., Publishers.
- Marvin, J., B. Shelden Czerwinski, H. C. Sproat, and D. Zirbel
2020 *National Register of Historic Places Registration Form. Truckee Veterans Memorial Building*. Form on file with the National Parks Service.
- Monca.org
2022 *Chico Veterans Memorial Hall. A Look Inside the Vets Hall*. Electronic document accessed 12/6/2024.
<https://monca.org/vets-hall/>
- National Cooperative Soil Survey
2023 *Gridley Series*. Electronic document accessed 12/9/2024.
<https://casoilresource.lawr.ucdavis.edu/sde/?series=Gridley#osd>
- R.L Polk and Co
1890 *California State Gazetteer and Business Directory 1890*. San Francisco, CA. R. L. Polk & Co.
1893 *California State Gazetteer and Business Directory 1893*. San Francisco, CA. R. L. Polk & Co.
- Sweeny, J. S.
2007 *National Register of Historic Places Registration Form. Alameda Veterans. Memorial Building*. Form on file with the National Parks Service.
- Westwood
1993 *National Register of Historic Places Registration Form. Legion Memorial Building, American Fork City*. Form on file with the National Parks Service.

Appendix A

Figures



USGS 7.5' Quadrangle Map: Gridley
PLSS: T.18N., R.2E., Sec. 36

Legend

Project Area



Gridley Veteran's Memorial Hall Architectural Inventory Project Location Map

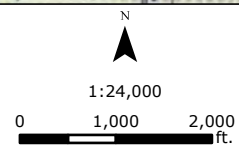


FIGURE
1

SOURCE
ESRI USA Topo Basemap

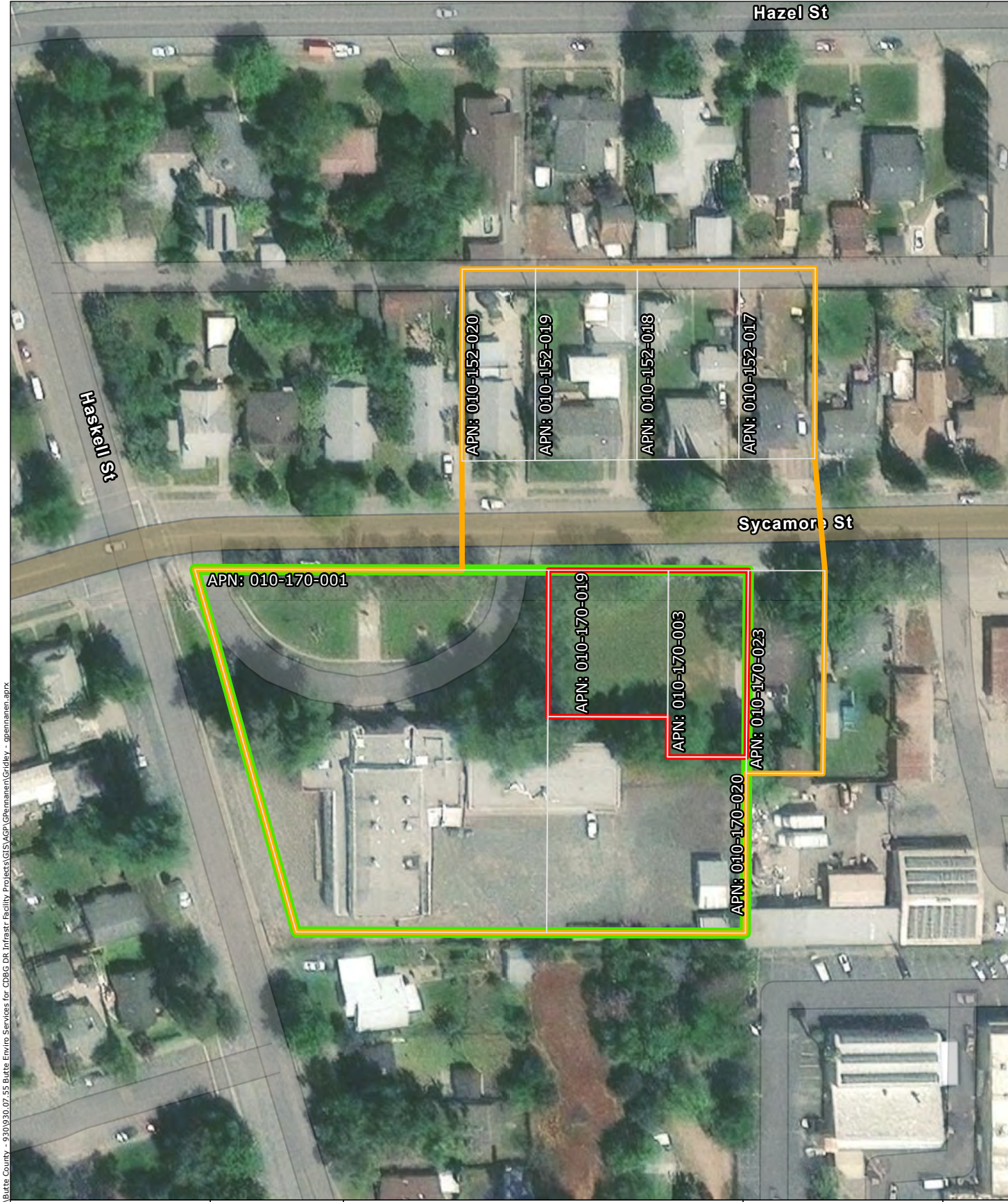
JOB NUMBER
930.07.55

DRAWN
G. Pennanen

DATE
12/10/2024

REVISED
-

APPROVED
J. Hall



Legend Project Area Area of Direct Impact Area of Secondary Effect Parcels	NCE Butte County	Gridley Veteran's Memorial Hall Architectural Inventory Area of Potential Effect Map	N 1 in. = 100 ft. 0 50 100 ft.	FIGURE 2
SOURCE ESRI Imagery with Metadata Basemap	DATE 12/10/2024	JOB NUMBER 930.07.55	DRAWN G. Pennanen	APPROVED J. Hall

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Appendix B

Tribal Consultation

Tribal Summary Log – CDBG-DR Paradise Project

This summary pertains to Tribal Consultation and Correspondence for the CDBG-DR Gridley Project, located at 267 Sycamore Street, in the City of Gridley, CA. Native American correspondence was initiated by NCE with a letter and attached maps to the Native American Heritage Commission (NAHC) on June 24, 2024. The letter requested a record search of their Sacred Lands File (SLF) and a contact list for regional tribes that may have knowledge of cultural or tribal resources within or immediately adjacent to the project area. Inquiry letters were emailed and mailed to the tribes identified by NAHC on August 21, 2024, on Butte County letterhead.

Tribal Affiliation	Representative	Title
Mooretown Rancheria of Maidu Indians	Benjamin Clark	Chairperson
Nevada City Rancheria Nisenan Tribe	Richard Johnson	Chairman
Round Valley Reservation/ Covelo Indian Community	James Russ	President
TSI-AKIM Maidu of the Taylorsville Rancheria	Richard Cunningham Ben Cunningham Ben Cunningham-Summerfield James Moon Donald Ryberg	Vice Chairperson Tribal Council Member Cultural Advisor Tribal Member Chairperson
United Auburn Indian Community of the Auburn Rancheria	Matt Moore Gene Whitehouse	THPO Chairperson

On September 11, 2024, follow-up emails were sent to tribes identified by the NAHC who did not respond to the initial outreach. The table below provides a summary of correspondence. Consultation-related material, including the NAHC request and an example of the tribal consultation letters sent, is located on the following page.

Tribal Affiliation	Representative	Sent Letters	Follow Up Emails	Communications
Mooretown Rancheria of Maidu Indians	Benjamin Clark	8/21/24	-	8/28/24 – Mooretown indicated a strong possibility of cultural material in the APE and asked to begin formal consultation. 9/11/24 – Asked for recommended mitigation measures. No response to date.
Nevada City Rancheria Nisenan Tribe	Richard Johnson	8/21/24	9/11/24	No comment to date.
Round Valley Reservation/ Covelo Indian Community	James Russ	8/21/24	9/11/24	No comment to date.
TSI-AKIM Maidu of the Taylorsville Rancheria	Richard Cunningham Ben Cunningham Ben Cunningham-Summerfield James Moon Donald Ryberg	8/21/24	9/11/24	No comment to date.

United Auburn Indian Community of the Auburn Rancheria	Matt Moore Gene Whitehouse	8/21/24	-	8/21/24 – Web submission for consultation. 9/3/24 – UAIC declined to consult since the project is outside their traditional affiliated lands.
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Date: June 24, 2024
To: California Native American Heritage Commission
From: NCE
Subject: CDBG-DR Gridley Project, City of Gridley, Butte County

Ms. Christina Snider, Executive Secretary
California Native American Heritage Commission
1550 Harbor Boulevard, Suite 100
West Sacramento, California 95691

Dear Ms. Snider:

Butte County (County) proposes to implement the CDBG-DR Gridley Project (project), located at 267 Sycamore Street, in the City of Gridley. The project will include the new construction and rehabilitation of a property owned by Butte County through a Community Development Block Grant – Disaster Recovery (CDBG-DR). The project would remodel the existing 5,000 square foot (sqft) office building for the construction of a new 10,000 sqft building and a new paved parking lot.

The project will be funded with County Community Development Block Grant (CDBG) funds and involves ground disturbance requiring completion of a National Environmental Preservation Act (NEPA) Categorical Exclusion Subject to Federal Statutory Requirements and California Environmental Quality Act (CEQA). The Project also requires compliance with Section 106 of the National Historic Preservation Act (NHPA) and Assembly Bill 52 (AB-52).

NCE has been retained to complete initial compliance with Section 106 of the NHPA, CEQA in accordance with Public Resource Code (PRC) Section 21083.2 and 21084.1 and AB-52 as identified in PRC Section 21080.3.1(b)(2). The project is within four parcels (APN: 010-170-001, 010-170-019, 010-170-003, and 010-170-020) totaling approximately 2.62-acres located in the City of Gridley. Maps are enclosed for your review. Figure 1 is a location map of the project area at a 1:24,000 scale with a USGS 7.5' quadrangle background (Gridley). Figure 2 is a detail map with aerial imagery.

Please provide a Native American contact list for within and near the project area. We also request that you conduct a search of your Sacred Lands database for any places of concern that may be located within or adjacent to the proposed project area.

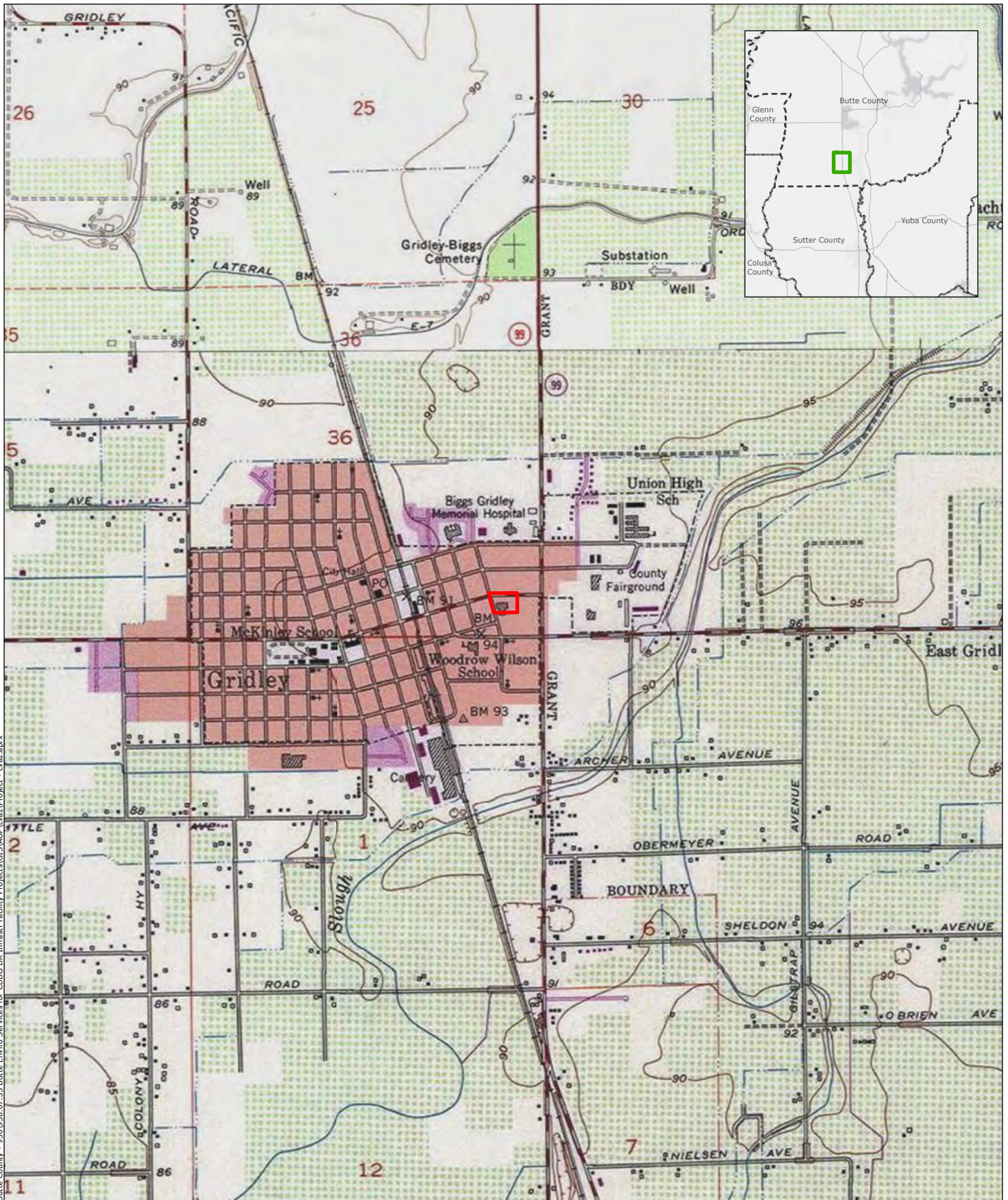
If you have any questions, please feel free to contact me via email at gpennanen@ncenet.com or by telephone (775-588-2505). I appreciate your assistance and look forward to hearing from you soon.

Sincerely,

Genevieve Pennanen
NCE | Staff Cultural Resources Specialist

Enclosed: Tribal Consultation List Request Form; Figure 1 – Location Map; Figure 2 – Detail Map

Pt. Richmond, CA
501 Canal Blvd., Suite I
Pt. Richmond, CA 94804
(510) 215-3620



Legend Project site	NCE ButteCounty CALIFORNIA	Project Location Map CDBG-DR Gridley Project 239 Sycamore Street, Butte County, CA	N 1:24,000 0 1,000 2,000 ft.	FIGURE 1	
SOURCE ESRI USA Topographic Basemap	JOB NUMBER 930.07.55	DRAWN cvaz	DATE 6/24/2024	REVISED -	APPROVED -



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County Administration

25 County Center Drive, Suite 200
Oroville, California 95965

Andy Pickett, County Administrator
Megan Jesse, Assistant County Administrator

T: 530.552.3300
F: 530.538.7120

buttecounty.net/administration

Members of the Board

Bill Connolly | Peter Durfee | Tami Ritter | Tod Kimmelshue | Doug Teeter

August 21, 2024

Ben Cunningham-Summerfield
Cultural Advisor
TSI-AKIM Maidu of the Taylorsville Rancheria
4933 Ponderosa Way
Medpines CA 95345

Dear Mr. Cunningham-Summerfield:

Butte County (County) proposes to implement the CDBG-DR Gridley Project (project), located at 267 Sycamore Street, in the City of Gridley. The project will include the construction of a one-story Behavioral Health Center (BHC) on parcels owned by Butte County. The BHC would ideally be close to 14,000 square feet (SF) but may be closer to 10,000 SF to stay within budget. The project also includes the renovation of the existing parking lots on the west and south side of the properties. The project is anticipated to have a depth of excavation of approximately 1-2 feet. Construction is slated to begin in the 3rd quarter of 2025 and last approximately 9 months.

The project will be funded with County Community Development Block Grant (CDBG) funds and involves ground disturbance requiring completion of a National Environmental Preservation Act (NEPA) Environmental Assessment and California Environmental Quality Act (CEQA) Initial Study. The Project also requires compliance with Section 106 of the National Historic Preservation Act (NHPA) and Assembly Bill 52 (AB-52).

The project is within four county-owned parcels (APN: 010-170-001, 010-170-019, 010-170-003, and 010-170-020) totaling approximately 2.62-acres located in the City of Gridley. Maps are enclosed for your review. Figure 1 is a location map of the project area at a 1:24,000 scale with a USGS 7.5' quadrangle background (Gridley), and Figure 2 is a detail map with aerial imagery (**Attachment 1 and 2**). The project anticipates merging the parcels into one.

A records search of the project area and a 100-meter buffer was received from the Northeast Information Center (NEIC) on July 1, 2024 (**Attachment 3**). The records search indicated no resources were in the project area or within the 100-meter buffer.

A search of the Native American Heritage Commission (NAHC) Sacred Lands File was received for the project on June 27, 2024; the results were negative (**Attachment 4**).

Please consider this letter and preliminary project information as the initiation of AB-52 consultation pursuant to the CEQA and Section 106 consultation pursuant to the NHPA. We would appreciate a response within 30 days of receipt of this letter if you would like to consult on this project. Please provide a designated lead contact person if you have not provided that information to us already.

If you have any questions, please feel free to contact Genevieve Pennanen via email at gpennanen@ncenet.com or by telephone (775) 588-2505. We appreciate your assistance and look forward to hearing from you soon.

Sincerely,

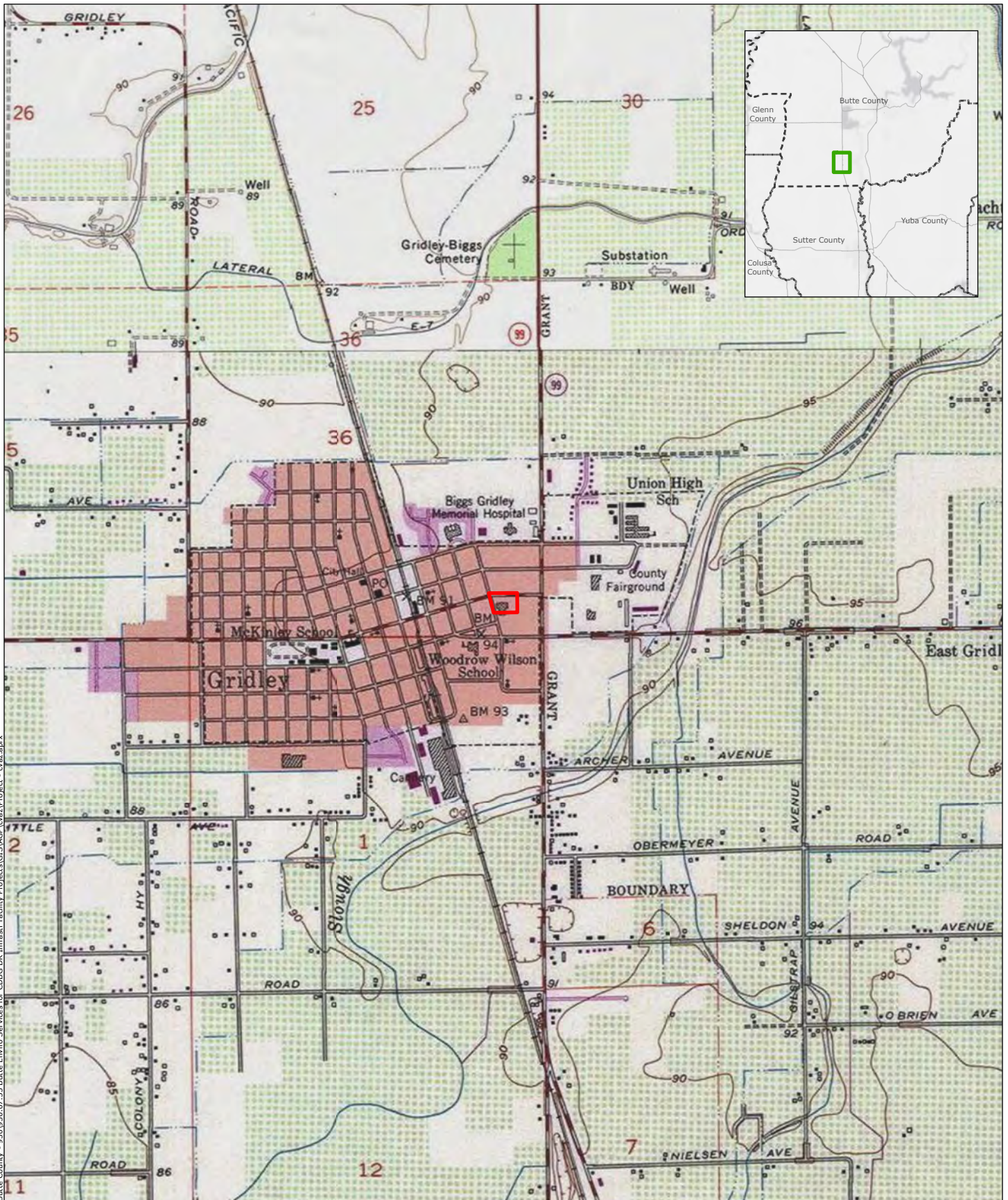


Shelly Ohms

Program Development Manager Butte County
Administration

Attachments:

1. Figure 1 – Project Area Location Map
2. Figure 2 – Project Area Aerial Map
3. NEIC Record Search Results
4. NAHC Sacred Lands File Results



Legend Project site	NCE ButteCounty CALIFORNIA	Project Location Map CDBG-DR Gridley Project 267 Sycamore Street, Butte County, CA	N 1:24,000 0 1,000 2,000 ft.	FIGURE 1	
SOURCE ESRI USA Topographic Basemap	JOB NUMBER 930.07.55	DRAWN cvaz	DATE 6/24/2024	REVISED -	APPROVED -



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California Historical Resources Information System

BUTTE
GLENN
LASSEN
MODOC
PLUMAS
SHASTA

SIERRA
SISKIYOU
SUTTER
TEHAMA
TRINITY

Northeast Information Center
1074 East Avenue, Suite F
Chico, California 95926
Phone (530) 898-6256
neinfocntr@csuchico.edu

July 1, 2024

Genevieve Pennanen
NCE
1003 Cutting Boulevard, Suite 110
Richmond, CA 94804

IC File # NE24-344
Data Request – Priority

RE: CDBG-DR Gridley Project
T18N, R2E, Section 36 MDBM
USGS Gridley 7.5' (1973) & Gridley 15' (1967) quadrangle maps
2.61 acres (Butte County)

Genevieve Pennanen:

In response to your request, a records search for the project cited above was conducted by examining the official maps and records for cultural resources and reports in Butte County. Please note, the search includes the requested 100-foot radius surrounding the project area.

RESULTS:

Resources within project area:	No resources were located in the project area
Resources within 100-foot radius:	No resources were located in the project vicinity
Reports within project area:	NEIC-000175, 000839, & 014341
Reports within 100-foot radius:	NEIC-001048

As indicated on your data request form, the locations of resources and reports are provided in the following format: ☐ Custom Maps ☒ GIS Data ☐ N/A

<u>Resource Database Printout (list):</u>	☐ enclosed	☐ not requested	☒ nothing listed
<u>Resource Database Printout (details):</u>	☐ enclosed	☐ not requested	☒ nothing listed
<u>Resource Digital Database Records:</u>	☐ enclosed	☐ not requested	☒ nothing listed
<u>Report Database Printout (list):</u>	☒ enclosed	☐ not requested	☐ nothing listed
<u>Report Database Printout (details):</u>	☒ enclosed	☐ not requested	☐ nothing listed
<u>Report Digital Database Records:</u>	☒ enclosed	☐ not requested	☐ nothing listed
<u>Other Reports: *</u>	☐ enclosed	☒ not requested	☐ nothing listed
<u>Resource Record Copies:</u>	☐ enclosed	☐ not requested	☒ nothing listed
<u>Report Copies:</u>	☐ enclosed	☒ not requested	☐ nothing listed
<u>Built Environment Resources Directory:</u>	☐ enclosed	☐ not requested	☒ nothing listed
<u>Archaeological Determinations of Eligibility:</u>	☐ enclosed	☐ not requested	☒ nothing listed
<u>CA Inventory of Historic Resources (1976):</u>	☐ enclosed	☐ not requested	☒ nothing listed
<u>Caltrans Bridge Survey:</u>	☐ enclosed	☒ not requested	☐ nothing listed
<u>Ethnographic Information:</u>	☐ enclosed	☒ not requested	☐ nothing listed
<u>Historical Literature:</u>	☐ enclosed	☒ not requested	☐ nothing listed
<u>Historical Maps:</u>	☐ enclosed	☒ not requested	☐ nothing listed
<u>Local Inventories:</u>	☐ enclosed	☒ not requested	☐ nothing listed
<u>GLO and/or Rancho Plat Maps:</u>	☐ enclosed	☒ not requested	☐ nothing listed
<u>Shipwreck Inventory:</u>	☐ enclosed	☒ not requested	☐ nothing listed

Notes: *These are classified as studies that are missing maps or do not have a field work component.

Please refer to the NRCS Soil Survey website for current soil survey information:

<https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>

Please forward a copy of any resulting reports from this project to the office as soon as possible.
Due to the sensitive nature of archaeological site location data, we ask that you do not include resource location maps and resource location descriptions in your report if it is for public distribution.

The provision of California Historical Resources Information System (CHRIS) Data via this records search response does not in any way constitute public disclosure of records otherwise exempt from disclosure under the California Public Records Act or any other law, including, but not limited to, records related to archaeological site information maintained by or on behalf of, or in the possession of, the State of California, Department of Parks and Recreation, State Historic Preservation Officer, Office of Historic Preservation (OHP), or the State Historical Resources Commission.

Not all known cultural resources have been recorded and submitted to the OHP, so this record search should not be considered an exhaustive list of all cultural resources present in your project area. DPR forms and reports that are used for recording and evaluating sites and individual resources are submitted to the Northeast Information Center by private and public agencies. Please note that the Northeast Information Center is not responsible for misinformation of coordinates presented on the submitted DPR forms. If a discrepancy is found, please contact the lead agency for more information.

Due to processing delays and other factors, it is possible that not all reports and resource records that have been submitted to the OHP are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for cultural resource management work in the search area. Additionally, Native American tribes have cultural resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

An invoice will follow from Chico State Enterprises for billing purposes. Thank you for your concern in preserving California's cultural heritage, and please feel free to contact us if you have any questions or need any further information.

Sincerely,

Ashlyn Weaver, M.A.
Coordinator & GIS Specialist
Northeast Information Center
(530) 898-6256



NATIVE AMERICAN HERITAGE COMMISSION

June 27, 2024

Gena Pennanen
NCEVia Email to: GPennanen@ncenet.comCHAIRPERSON
Reginald Pagaling
ChumashVICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
NomlakiSECRETARY
Sara Dutschke
MiwokPARLIAMENTARIAN
Wayne Nelson
LuiseñoCOMMISSIONER
Isaac Bojorquez
Ohlone-CostanoanCOMMISSIONER
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Laurena Bolden
SerranoCOMMISSIONER
Reid Milanovich
CahuillaCOMMISSIONER
Bennae Calac
Pauma-Yuima Band of
Luiseño IndiansEXECUTIVE SECRETARY
Raymond C.
Hitchcock
Miwok, NisenanNAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, CDBG-DR Gridley Project, Butte County

Dear Ms. Pennanen:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

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

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

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

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

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

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

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

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

Sincerely,

Cameron Vela

Cameron Vela
Cultural Resources Analyst

Attachment



Thank you for consulting with the UAIC

Please complete one form for each notification.

How to submit a consultation notification or project update:

1. One form must be completed for each project.
2. Forms cannot be saved and completed at a later time.
3. Include all relevant project information.
4. Upload file attachments. Multiple files can be attached.
5. Submit form.
6. You will receive a submission receipt via email when submission is complete. UAIC prefers our online submission form over certified or hard copy letters.

Contact the Tribal Office at (530) 883-2390 for questions or concerns. Ask for Tribal Historic Preservation or use the [contact form located on our website](#).

Contact Information

Consulting on Behalf of* Butte County
Lead Agency, Consulting Firm, Tribe

Mailing Address

Street Address

Address Line 2

City State / Province / Region

Postal / Zip Code

Point of Contact for Consultation* Genevieve Pennanen
Primary Contact Name

Point of Contact Email* gpennanen@ncenet.com

Second Point of Contact ☐ Yes
Is there more than one point of contact for this project?

Regulatory

Consulting Under* This project fall under the following regulatory requirements:

☐ Federal ☐ State of California ☒ Federal and State

☐ Other

Federal Regulations* Select all that apply

☒ National Env. Policy Act/National Historic Preservation Act (Section 106)

☐ 408 Permit

☐ 404 Permit

☐ PL84-99

☐ Native American Graves Protection and Repatriation Act (NAGPRA)

☐ Other

**California
Regulations ***

Select all that apply

- ☒ Assembly Bill 52 (PRC §21080.3.1)
☐ Senate Bill 18
☒ Environmental Quality Act (CEQA)
☐ Forest Practice Rules
☐ CalNAGPRA
☐ Assembly Bill 168
☐ Other

Project Notification Information

Project Name *

CDBG-DR Gridley

Please include Name and Reference Number (if applicable)

This is a *

- ☒ New Project ☐ Notice of Preparation (NOP)
☐ Public Hearing ☐ Notice of Availability (NOA)
☐ Request for Information ☐ Other

Project Description

The project will include the construction of a one-story Behavioral Health Center (BHC) on parcels owned by Butte County. The BHC would ideally be close to 14,000 square feet (SF) but may be closer to 10,000 SF to stay within budget. The project also includes the renovation of the existing parking lots on the west and south side of the properties. The project is anticipated to have a depth of excavation of approximately 1-2 feet.

Please include a brief project description

**Project/Construction
Year ***

2025

Please select the year your project will initiate

**Project/Construction
Season**

Please select the season your project will initiate (if applicable)

**Environmental
Document Timeline**

Please share when your final environmental document is planned for public review

Location

267 Sycamore Street, Gridley, CA

Please include county, city, and address (if available)

Project Documents

Documents uploaded to this form are secure and only accessible by the Tribal Historic Preservation team

Notification *

Attach notification letters or announcement

Gridley Tribal Letter UAIC.pdf 88.91KB
50mb maximum upload size (per file)

Reports

Attach project reports, project descriptions, or supporting documents. Please add the following if available: Cultural, Biology, Arborist

Attachments.pdf 6.18MB
50mb maximum upload size (per file)

Location Map

Attach maps and location files. Shape files are preferred

File extensions allowed: pdf, jpg, png, kmz, lpk, dbf, prj, shp, abn, sbx, xml, shx, cpg, .zip.
NOTE: 50mb maximum upload size (per file).

Send Submission Receipt To

☒ Primary Contact ☐ Secondary Contact ☐ Different Email

***This form submission page is offered for the convenience of consulting agencies, developers, and their respective consultants. UAIC reviews all submissions received, but makes no guarantee that submission via this online form satisfies any particular consultation or notice requirement that exists under state or federal law.

AB52: CDBG-DR Gridle

Anna Starkey <astarkey@auburnrancheria.com>

Tue 9/3/2024 11:09 AM

To: Gena Pennanen <GPennanen@ncenet.com>

Good morning,

This project falls outside of UAIC's area of traditional and cultural affiliation, therefore we decline to consult.

Thank you,
Anna



Anna M. Starkey, M.A., RPA

Cultural Regulatory Manager

Tribal Historic Preservation Department

United Auburn Indian Community of the Auburn Rancheria

Email: astarkey@auburnrancheria.com

[www.auburnrancheria.com/programs-services/tribal-](http://www.auburnrancheria.com/programs-services/tribal-preservation)

[preservation](http://www.auburnrancheria.com/programs-services/tribal-preservation)

10720 Indian Hill Road

Auburn, CA 95603

Nothing in this e-mail is intended to constitute an electronic signature for purposes of the Electronic Signatures in Global and National Commerce Act (E-Sign Act), 15, U.S.C. §§ 7001 to 7006 or the Uniform Electronic Transactions Act of any state or the federal government unless a specific statement to the contrary is included in this e-mail.



Mooretown Rancheria

#1 Alverda Drive

Oroville, CA 95966

(530) 533-3625 Office

(530) 533-3680 Fax

August 28, 2024

Ms. Genevieve Pennanen
Butte County Administration
P.O. Box 1411
Quincy, CA 95971

Re: Proposed Implementation of CDBG-DR Gridley Project – Gridley, Butte County, CA

Dear Ms. Pennanen:

Thank you for your letter dated, 8/21/2024, seeking information regarding the proposed Behavioral Health Center project in Butte County, California on 267 Sycamore Street. Based on the information provided, the Mooretown Rancheria is aware of a strong possibility of cultural resources being impacted or inadvertently discovered by this project, and would like to begin formal consultation.

As the project progresses, if any new information or human remains are found, we do have a process to protect such important and sacred artifacts (especially near rivers or streams).

Please contact the following individuals if tribal cultural items or Native American human remains are found:

THPO
Matthew.hatcher@mooretown.org

Thank you for providing us with this notice and opportunity to comment.

Sincerely,

Matthew Hatcher
Tribal Historic Preservation Officer

"Concow - Maidu"

Appendix C

NEIC Record Search (redacted)

Appendix D

Photographs

CULTURAL RESOURCES PHOTOGRAPH RECORD

Project Name: Gridley Behavioral Health Services Facility Project



Description: Front façade of Gridley Veterans Memorial Building Direction: South
File Name: Gridley VMH-2024-07-03-10-24-28.jpg Date:07/03/2024 Photographer: S Rathbone



Description: Front façade of Butte County Offices and Court Building Direction: South
File Name: Gridley VMH-2024-07-03-10-48-16.jpg Date:07/03/2024 Photographer: S Rathbone

CULTURAL RESOURCES PHOTOGRAPH RECORD

Project Name: Gridley Behavioral Health Services Facility Project



Description: View along Sycamore Street at the north of the Project area Direction: East
File Name: Gridley VMH-2024-07-03-10-54-33.jpg Date:07/03/2024 Photographer: S Rathbone



Description: View along Sycamore Street at the north of the Project area Direction: West
File Name: Gridley VMH-2024-07-03-10-54-53.jpg Date:07/03/2024 Photographer: S Rathbone

CULTURAL RESOURCES PHOTOGRAPH RECORD

Project Name: Gridley Behavioral Health Services Facility Project



Description: View along Haskell Street at the north of the Project area

Direction: South

File Name: Gridley VMH-2024-07-03-11-00-26.jpg Date:07/03/2024

Photographer: S Rathbone



Description: 220 Sycamore Street in the AIE

Direction: North

File Name: Gridley VMH-2024-07-03-10-55-53.jpg Date:07/03/2024

Photographer: S Rathbone

CULTURAL RESOURCES PHOTOGRAPH RECORD

Project Name: Gridley Behavioral Health Services Facility Project



Description: 210 Sycamore Street in the AIE

Direction: North

File Name: Gridley VMH-2024-07-03-10-56-28.jpg

Date: 07/03/2024

Photographer: S Rathbone



Description: 445 Haskell Street, to the west of the Project area

Direction: West

File Name: Gridley VMH-2024-07-03-10-56-28.jpg

Date: 07/03/2024

Photographer: S Rathbone

CULTURAL RESOURCES PHOTOGRAPH RECORD

Project Name: Gridley Behavioral Health Services Facility Project



Description: 380 Haskell Street, to the west of the Project area

Direction: Southeast

File Name: Gridley VMH-2024-07-03-11-03-07.jpg Date:07/03/2024

Photographer: S Rathbone



Description: Commercial buildings along Hazel Street in downtown Gridley

Direction: West

File Name: Gridley VMH-2024-07-03-12-25-39.jpg Date:07/03/2024

Photographer: S Rathbone

CULTURAL RESOURCES PHOTOGRAPH RECORD

Project Name: Gridley Behavioral Health Services Facility Project



Description: Gridley Carnegie Library, by Chester Cole

Direction: Northwest

File Name: Gridley VMH-2024-07-03-13-35-42.jpg Date:07/03/2024 Photographer: S Rathbone



Description: Butte Theater, Gridley Direction: Southwest

File Name: Gridley VMH-2024-07-03-12-28-31.jpg Date:07/03/2024 Photographer: S Rathbone

CULTURAL RESOURCES PHOTOGRAPH RECORD

Project Name: Gridley Behavioral Health Services Facility Project



Description: View along Virginia Street from Sycamore Street

Direction: South

File Name: Gridley VMH-2024-07-03-13-41-52.jpg Date:07/03/2024

Photographer: S Rathbone



Description: View along Virginia Street from Magnolia Street

Direction: South

File Name: Gridley VMH-2024-07-03-13-43-37.jpg Date:07/03/2024

Photographer: S Rathbone

Appendix E

Resource Location Map (redacted)

Appendix F

DPR Forms (redacted)