



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
wildlife.ca.gov

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director



July 22, 2026

Steven Lazar
Senior Planner
Humboldt County Planning & Building Department
3015 H Street
Eureka, CA 95501
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SUBJECT: PROJECT MCKINLEY (SCH# [2026061280](#))

Dear Steven Lazar,

On June 29, 2026, the California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) from the Humboldt County Planning and Building Department (County; Lead Agency) for Project McKinley (Project). CDFW appreciates the opportunity to provide feedback and understands the Lead Agency will accept comments through July 29, 2026.

As the Trustee Agency for the State's fish and wildlife resources, CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary to sustain their populations (Fish & G. Code, §§ 1801 & 1802). As a Responsible Agency, CDFW administers the California Endangered Species Act (CESA) and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources. CDFW offers the following comments and recommendations in our role as Trustee and Responsible Agency pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, §21000 et seq.). These comments are intended to minimize Project impacts on public trust resources.

Project Description

The Project is located near the California Redwood Coast – Humboldt County Airport (also known as the Arcata/Eureka Airport) in the unincorporated community of McKinleyville in Humboldt County, California. The Project site is

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comprised of six undeveloped parcels within the Airport Business Park (APNs 511-461-009, 511-461-010, 511-461-024, 511-461-029, 511-461-030, and 511-461-031). The vacant property consists of open grassland with a few scattered trees along the margins. The Project would construct a 40,290 square foot warehouse building and distribution facility with truck docks, parking, internal roadways, stormwater management, and landscaping. The facility would be operated by Amazon and is designed to serve as a hub for “last mile” delivery services of online orders. It would operate 24 hours a day and would be served by line-haul trucks and fleet vans, with no onsite customers.

CDFW Consultation History

CDFW visited the property and provided preliminary recommendations in 2025.

Biological Significance

The Project site is a flat, open grassland with scattered pine, cypress, and ironwood trees along the outer edges. Although dominated by non-native grasses and forbs, the grassland retains elements of coastal prairie habitat, with widespread beach strawberry (*Fragaria chiloensis*) and California blackberry (*Rubus ursinus*). The Arcata/Eureka Airport hosts an extensive population of Siskiyou checkerbloom (*Sidalcea malviflora* ssp. *patula*) and coast checkerbloom (*Sidalcea oregana* ssp. *eximia*), which are considered rare, threatened, or endangered in California and elsewhere (California Rare Plant Rank 1B.2). Both species are documented in ruderal grasslands and on road shoulders. The Project site is also within the historic range of western bumble bee (*Bombus occidentalis*), a candidate species pursuant to CESA. The site is characterized by a variety of floral resources and extensive gopher activity, which provide suitable foraging and nesting habitat for western bumble bee.

Comments and Recommendations

A thorough biological assessment of sensitive wildlife, plants, and habitats should be conducted prior to circulation of the DEIR to adequately disclose direct, indirect, and cumulative impacts and identify feasible mitigation measures. Given the site's proximity to an extant population Siskiyou checkerbloom and coast checkerbloom (CDFW 2026), CDFW recommends conducting floristic botanical surveys following CDFW's March 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*, or similar guidelines (**Recommendation 1**). In addition to

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addressing special status plants, the botanical survey should identify and map any Sensitive Natural Communities.

Western bumble bee has experienced an 84% decline in relative abundance and occupies less than 50% of its historic range (Xerces Society et al. 2018). Although there have been no recent sightings on the coast, there are historical occurrences of western bumble bee in McKinleyville (CDFW 2026), and the Project site contains suitable habitat. Vegetation removal and ground disturbance have the potential to adversely impact the species and its habitat through loss of floral resources, burrow collapse, nest abandonment, and direct mortality. To evaluate potential impacts to western bumble bee, CDFW recommends conducting seasonally appropriate protocol-level surveys for special status bumble bees (**Recommendation 2**). Non-lethal photo vouchers, as described in the [California Bumble Bee Atlas Point Surveys](#) or the [USFWS Survey Protocols for Rusty Patched Bumble Bee](#), are considered the most efficient and accurate means of identifying bumble bees without causing unnecessary harm. However, capture is a form of *take* and would require additional authorization from CDFW (Fish & G. Code §§ 1002, 1002.5, 1003, & 2081 subd. (a)). If western bumble bee is detected, the Project proponent should consult with CDFW to evaluate potential impacts and feasible avoidance measures (**Recommendation 3**). If take cannot be avoided, the Project proponent should obtain an Incidental Take Permit (ITP) (**Recommendation 4**) pursuant to Fish and Game 2081(b) (see Cal. Code Regs., tit. 14, § 783 et seq.).

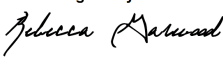
Summary of Recommendations

- 1) Conduct floristic botanical surveys following CDFW's March 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*, or similar guidelines.
- 2) Conduct seasonally appropriate protocol-level surveys for special status bumble bees.
- 3) If western bumble bee is detected, the Project proponent should consult with CDFW to evaluate potential impacts and feasible avoidance measures.
- 4) If take cannot be avoided, the Project proponent should obtain an Incidental Take Permit (ITP).

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Thank you for the opportunity to comment on this NOP. CDFW staff are happy to consult with the County and provide technical expertise. Please contact Kathryn Rian, Environmental Scientist, at Kathryn.Rian@wildlife.ca.gov with any questions or comments.

Sincerely,

DocuSigned by:

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Rebecca Garwood
Northern Region Coastal Habitat Conservation Program Manager

cc: State Clearinghouse, Office of Planning and Research
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References

- CDFW. 2026. California Natural Diversity Database. Biogeographic Data Branch, California Department of Fish and Wildlife. Retrieved July 16, 2026, from [California Natural Diversity Database](#).
- Xerces Society, Defenders of Wildlife, and Center for Food Safety. 2018. A petition to the State of California Fish and Game Commission to list the Crotch bumble bee (*Bombus crotchii*), Franklin's bumble bee (*Bombus franklini*), Suckley cuckoo bumble bee (*Bombus suckleyi*), and western bumble bee (*Bombus occidentalis occidentalis*) as Endangered under the California Endangered Species Act. Available from [A Petition to the State of California Fish and Game Commission to List Four Bumble Bees as Endangered under the California Endangered Species Act | Xerces Society](#).