

Addendum to the 2017 Initial Study / Mitigated Negative Declaration

**Covelo State Route 162 Corridor Multi-
Purpose Trail, SCH No. 2017102051**

Mendocino Council of Governments

19 January 2022



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1. Introduction

1.1 Background

The Mendocino Council of Governments (MCOG), in partnership with the California Department of Transportation (Caltrans) and the Round Valley Indian Tribe (RVIT), have received grant funding for the design and construction of the Covelo SR 162 Corridor Multi-Purpose Trail. Non-motorized travel is an important form of transportation in Round Valley. Covelo and the Round Valley Indian Reservation are not served by public transportation. Children, elderly and low-income residents use non-motorized travel modes. The need for safe pedestrian corridors was identified by local residents as a high priority in the Covelo/Round Valley Non-Motorized Needs Assessment and Engineered Feasibility Study (2014) and in Making Safe & Healthy Community Connections in Round Valley – Walk/Bike Path and Community Revitalization Strategy (2010).

The purpose of this project is to reduce the potential for conflicts between bicyclists, pedestrians, and vehicles within a portion of the SR 162 Corridor and increase mobility options in the community. SR 162 serves as “Main Street” within the community of Covelo. The highway has no developed facilities for bicycles or pedestrians and the drainage ditches on both sides of the highway force non-motorized users to travel in the vehicle lanes. The project would link critical activity centers within the community, including schools, the downtown center, tribal facilities, and residential areas.

On December 4, 2017, MCOG adopted an Initial Study/Mitigated Negative Declaration (2017 ISMND) and Mitigation Monitoring and Reporting Program and approved the Covelo State Route 162 Corridor Multi-Purpose Trail Project (project). Since adoption of the 2017 ISMND, the project design has been modified to include slight adjustments to the alignment of the proposed bridge.

MCOG has evaluated the changes in the project design along with the circumstances surrounding the project pursuant to the California Environmental Quality Act (CEQA). The changes to the project design have been evaluated and measured against the standards set forth in CEQA Guidelines Section 15162 which outlines the circumstances under which a CEQA Lead Agency is required to prepare a Subsequent MND. No elements requiring the preparation of a Subsequent MND have been identified, as the changes in the project design along with the circumstances surrounding the project do not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects requiring new mitigation measures beyond those previously addressed in the 2017 ISMND. Under CEQA Guidelines Section 15164, a CEQA Lead Agency may prepare an Addendum to a previously adopted negative declaration to analyze changes in a project, or in circumstances surrounding a project, where the record indicates that a subsequent negative declaration is not required. Therefore, an Addendum to the 2017 ISMND has been determined to be the appropriate CEQA document.

This Addendum reflects the analysis of the MCOG as the CEQA Lead Agency. Further, it demonstrates that the environmental analysis, impacts, and mitigation requirements identified in the 2017 ISMND remain essentially unchanged by the minor changes to the project described herein. The project modifications do not result in a new significant impact or substantial increase in the severity of a previously identified significant impact, and therefore do not exceed the level of impacts identified in the 2017 ISMND.

Per CEQA Guidelines Section 15164(c), an Addendum need not be circulated for public review. Per CEQA Guidelines Section 15164(d), the decision-making body shall consider an Addendum prior to making a decision on the project. Accordingly, this Addendum, along with the 2017 ISMND, will be considered by the decision-making bodies prior to any future decision on the project. This Addendum, along with the previous environmental analyses, is on file with and may be obtained from the Mendocino Council of Governments, 367 N. State Street, Suite 206, Ukiah, California, 95482.

1.2 Framework for Evaluation of Project Modifications

As directed by CEQA Guidelines Section 15162, when an MND has been adopted for a project, no subsequent MND shall be prepared, unless one or more of the following circumstances occur:

1. Substantial changes are proposed in the project which will require major revisions of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revision of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous MND was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous MND;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous MND;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous MND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The changes in environmental impacts due to modifications in the project or changed conditions have been evaluated and measured against the standards set forth in paragraphs 1, 2, and 3 above. The environmental analysis is provided in Section 3.

2. Changes to Project Since 2017 ISMND

Changes to the project are limited to the Mill Creek bridge crossing, which has been slightly relocated. No additional changes to the project are proposed.

2.1 Mill Creek Bridge Crossing

The construction of the North-South segment of the Covelo Trail along the eastern side of Highway 162 requires the construction of a 240 foot long bridge for the crossing of Mill Creek. The bridge will be built from three 80 foot prefabricated sections. There will be two bents on pile foundations supporting the center section and each end will be built on a pile supported headwall. All support headwalls and bents will be located outside of the active channel.

The bridge was originally designed to be approximately 30 feet east of the existing Caltrans Highway bridge to allow for clearance from the existing bridge, existing power lines, and an existing buried sewer force main operated by Indian Health Services (IHS) to serve nearby tribal facilities. The location of the sewer force main and hence the offset from the existing bridge was based on the IHS design drawings. The original CEQA document was based on this alignment. However, following completion of the CEQA process, IHS made it known that their design drawings were not accurate and in fact the force main was further east, potentially putting it under the proposed pile foundations for the bridge. Therefore, it is necessary to move the bridge further eastward away from the force main.

A modified bridge alignment moved 15 feet to the east is proposed to provide sufficient clearance from the force main. Mill Creek is of uniform cross section in the vicinity of the bridge and hence the bridge concept is the same as originally proposed, but simply moved 15 feet to the east. The new location will require slightly modified approaches to the bridge and a slightly modified footprint (Figure 1).

2.2 Construction Schedule

The 2017 MND anticipated construction activities to begin in the spring of 2020. Construction activities are currently estimated to begin some time in 2022.

3. Analysis of Potential Environmental Effects

The following discussion analyzes the likelihood of the project changes, as described in Section 2, to result in new or substantially more significant effects, or the need for new mitigation measures as compared to those studied in the 2017 ISMND.

3.1 Aesthetics

The project modifications include slight adjustments to the alignment of the bridge crossing over Mill Creek. Construction of the project would require removal of vegetation similar to the original bridge alignment, and a significant change in visual conditions would not result. The project changes would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects relative to those identified in the 2017 ISMND. All impacts related to aesthetics would remain less than significant or no impact.

3.2 Agricultural and Forest Resources

The project modifications do not require revisions to the evaluation of Agricultural and Forest Resources. The location of the project is essentially unchanged from that evaluated in the 2017 MND, and there are no agricultural and forest resources in the project area that would be impacted by the updated bridge alignment. The project changes would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects for agricultural and forest resources than previously addressed in the 2017 ISMND. All impacts related to agricultural and forest resources would remain less than significant or no impact.

3.3 Air Quality

As the construction equipment and duration would remain essentially the same as that evaluated in the 2017 ISMND, the project changes would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects relative to those identified in the 2017 ISMND. The project would continue to incorporate Environmental Protection Action 2 (Implement Air Quality Emission Control Measures During Construction). All impacts related to air quality would remain less than significant.

3.4 Biological Resources

As a result of the updated bridge alignment over Mill Creek, vegetation impacts are anticipated to be moved to the east and slightly increased due to the slightly longer bridge approaches needed to join with the modified bridge location (Figure 1). However, the riparian vegetation in the area of the bridge is generally uniform and therefore the nature of the potential impacts is anticipated to be similar to those analyzed in the 2017 ISMND.

The habitat survey for the project conducted by GHD and completed in September, 2017 concluded that sensitive plant species were not observed within the project study boundary. Valley Oaks were also identified along the trail alignment and anticipated impacts to Valley Oaks were mitigated through additional planting. The area of the bridge is not appropriate habitat for Valley Oaks, and therefore moving the bridge will not alter Valley Oak impacts.

The project wetlands delineation identified the wetted channel of Mill Creek to be jurisdictional wetlands. However, the design of the bridge places the support bents outside of the wetted channel and hence outside of jurisdictional wetlands. The intent of moving the bridge 15 feet eastward is to keep the bridge support bents out of the wetted channel and therefore outside of the jurisdictional wetlands. No additional wetland impacts would result from the updated bridge alignment.

Existing mitigation measures included in the 2017 ISMND would remain to ensure impacts related to the updated bridge alignment are reduced to a less than significant level, including:

- Mitigation Measure BIO-1 Conduct Seasonally Appropriate Pre-Construction Plant Surveys
- Mitigation Measure BIO-2 Survey and (if necessary) Relocation of Sensitive Amphibian Surveys
- Mitigation Measure BIO-3 Conduct Bird Surveys for Protect Avian Species
- Mitigation Measure BIO-4 Replacement of Impacted Riparian Vegetation
- Mitigation Measure BIO-4b Pile Driving in Mill Creek
- Mitigation Measure BIO-5 Protection and Replacement of Oak Trees
- Mitigation Measure BIO-6 Mitigate Direct and Temporary Impacts to Wetlands During Construction

The footprint of the project is essentially unchanged from that evaluated in the 2017 ISMND. The intensity and duration of construction remain the same, and the modified project does not involve any additional construction activities below the ordinary high-water mark of Mill Creek. Mitigation measures would remain applicable to the modified project, avoiding potential adverse impacts to special-status species, migratory birds, riparian habitat, and

existing trees. The project would also continue to incorporate Environmental Protection Action 3 (Construction Measure for Avoiding Special-status Wildlife Species Habitat).

The MCOG has coordinated with jurisdictional resource agencies and applicable project approvals were obtained from each agency. The modified project would not result in new significant environmental effects or a substantial increase in the severity of effects for biological resources previously addressed in the 2017 ISMND. With the incorporation of mitigation measures, all potential impacts related to biological resources would be reduced to a less than significant level or no impact.

3.5 Cultural Resources

The Historical Resources Survey conducted by Tom Origer & Associates and completed in September 2017 and identified six historical resources in the overall project area and provided recommendations for their treatment. None of the resources were identified in the immediate vicinity of the proposed bridge and hence moving the bridge 15 feet to the east is not anticipated to impact any identified historical resources.

Existing mitigation measures for cultural resources would remain applicable to the updated bridge alignment over Mill Creek, including:

- Mitigation Measure CR-1 Protect Archaeological Resources During Construction
- Mitigation Measure CR-2 Protect Paleontological Resources During Construction
- Mitigation Measure CR-3 Protect Human Remains if Encountered During Construction

The modified project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects relative to those identified in the 2017 ISMND. With the incorporation of mitigation measures, all potential impacts to cultural resources would be reduced to a less than significant level.

3.6 Energy

The 2017 ISMND was completed before Energy was added to the Appendix G Environmental Checklist. The project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Given the design update is realigning a bridge that was already part of the project and no new bridge would be added to the project, there would be no measurable change in energy required to construct the project. No additional mitigation measures are required in this Addendum to offset potential impacts related to energy.

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Less Than Significant)

Construction of the Project would involve a variety of earthwork and construction practices, involving the use of heavy equipment. Construction would require the use of fuels, primarily gas, diesel, and motor oil. As detailed in the 2017 ISMND, the California Emissions Estimator Model (CalEEMod) version 2016.3.1 was used to estimate air pollutant emissions from project construction. Project construction is anticipated to begin in spring 2020 with construction complete within approximately six months. Construction equipment activity was estimated based on 2.5 acres of asphaltic pavement, and a 28.98 total acres of disturbance. Construction activity and duration is

expected to be substantially similar for both alternatives evaluated in the 2017 ISMND. Therefore, the emissions output is representative of each alternative.

Inefficient construction-related operations would also be avoided due to the measures in Environmental Protection Action 1 (Implement Air Quality Emission Control Measures During Construction). Equipment idling times would be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes or less (as required by Environmental Protection Action 1). Because construction would not encourage activities that would result in the use of large amounts of fuel and energy in a wasteful manner, and the incorporation of Environmental Protection Action 1 would reduce idling time, impacts related to the inefficient use of construction-related fuels would be less than significant.

Operation of the Project would include periodic maintenance including annual inspections, vegetation management, and infrequent pavement repair. In the event of storm damage, more significant repairs to the shared use pathway facility may be needed. These activities would generally be supported by vehicles and use of hand-held tools. The use of fossil-fuel powered equipment to support these operational and maintenance activities would be periodic and short-term (occurring intermittently). These activities would not result in a substantial increase in energy use, and would not result in inefficient, wasteful, or unnecessary consumption of fuels or other energy resources. By promoting bicycle and pedestrian transit, the Project would have a beneficial reduction on energy resources consumed by automobiles.

Operation and maintenance of the Project would not generate additional vehicle trips nor result in an increase in energy use above existing conditions. The potential for wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (No Impact)

The Project would not conflict with or inhibit the implementation of the State Energy Action Plan, Senate Bill (SB) 1389, SB 100, Assembly Bill (AB) 1007, or other State regulations. The Project would not inefficiently utilize energy due to incorporation of Mitigation Measure AIR-1, which limits idling time and provides measures to protect air quality. The Project would temporarily require the use of equipment in order to construct the components of the Project; however, these activities would be temporary and would not interfere with the broader energy goals of the State. Operationally, the Project would reduce automobile-related energy consumption by promoting and supporting pedestrian and bicycle transit. The majority of California's energy-related plans are not directly applicable to the Project or its operations; however, the Project complies with those plan requirements that apply. The Project would therefore not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, as no component of the Project would require an energy source, beyond the temporary use of construction equipment. No impact would result.

3.7 Geology & Soils

The project modifications do not require substantial revisions to the evaluation of geology and soils. The project site for the Mill Creek bridge crossing is only 15 feet away from the original bridge crossing location evaluated in the 2017 ISMND, and there are no changes to the risks associated with faults, ground shaking, liquefaction, landslides, expansive soils, or septic systems based on the same geologic setting. The project would continue to incorporate Environmental Protection Action 1 (Geotechnical Design). The modified project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects relative to those identified in the 2017 ISMND. All impacts related to geology and soils would remain less than significant.

3.8 Greenhouse Gas Emissions

The project modifications do not require substantial revisions to the evaluation of greenhouse gas emissions. The intensity and duration of construction would be essentially unchanged from that evaluated in the 2017 ISMND. Since adoption of the 2017 ISMND, the California Air Resources Board has updated the Climate Change Scoping Plan in December 2017. The recommended measures in the 2017 Scoping Plan are broad policy and regulatory initiatives that will be implemented at the State level and do not relate to the construction and operation of individual projects. The modified project would not result in new significant environmental effects or a substantial

increase in the severity of previously identified significant effects for greenhouse gas emissions than previously addressed in the 2017 ISMND. All impacts related to greenhouse gases would remain less than significant.

3.9 Hazards and Hazardous Materials

The project modifications do not require substantial revisions to the evaluation of hazards and hazardous materials. The intensity and duration of construction and the types of materials to be utilized during construction would be essentially unchanged from that evaluated in the 2017 ISMND. Existing mitigation measures for hazard-related impacts would remain applicable to the updated bridge alignment over Mill Creek, including:

- Mitigation Measure HAZ-1 Impacted Soil and Groundwater Sampling and Analysis
- Mitigation Measure HAZ-2 Prepare and Implement Fire Safety Plan

The modified project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects for hazards and hazardous materials than previously addressed in the 2017 ISMND. All impacts related to hazards and hazardous materials would remain less than significant or no impact.

3.10 Hydrology and Water Quality

The project modifications do not require substantial revisions to the evaluation of hydrology and water quality. The design of the bridge places the support bents outside of the wetted channel. The footprint of the project is essentially unchanged from that evaluated in the 2017 ISMND and would not require any additional in-water work or potential for new, unanalyzed water quality impacts. The project changes do not result in physical barriers that would inhibit the existing floodplain characteristics of Mill Creek. The modified project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects relative to those identified in the 2017 ISMND. All impacts related to hydrology and water quality would remain less than significant or no impact.

3.11 Land Use and Planning

The modified project would not affect environmental resources related to land use and planning. The modified bridge alignment would not physically divide an established community or conflict with the Mendocino County General Plan. The modified project would not result in new significant environmental effects or a substantial increase in the severity of effects for land use and planning previously addressed in the 2017 ISMND. All impacts related to land use and planning would remain no impact.

3.12 Mineral Resources

As with the 2017 project, the modified project is not located on, or would result in the loss of, a known mineral resource. The modified project would not result in new significant environmental effects or a substantial increase in the severity of effects for mineral resources previously addressed in the 2017 ISMND. All impacts related to mineral resources would remain less than significant.

3.13 Noise

The intensity and duration of construction would be unchanged from that evaluated in the 2017 ISMND. The modified project does not require construction work to occur at night but does require pile driving. Mitigation Measure NOI-1 (Hours of Construction) and Mitigation Measure NOI-2 (Implement BMPs from Construction) from the 2017 ISMND would remain applicable to the modified project, limiting the contractor's construction work hours and methods such that noise is reduced to acceptable levels. The modified project would not result in new significant environmental effects or a substantial increase in noise. The project's noise-related impacts would remain less than significant with the incorporation of mitigation.

3.14 Population and Housing

As with the 2017 project, the modified project would not displace existing housing or people. The modified project would not result in new significant environmental effects or a substantial increase in the severity of effects for population and housing previously addressed in the 2017 ISMND. There would be no impact related to population and housing.

3.15 Public Services

As with the 2017 project, the modified project would not result in a land use that would increase the need for public service. The modified project would not result in new significant environmental effects or a substantial increase in the severity of effects for public services previously addressed in the 2017 ISMND. There would be no impact related to public services.

3.16 Recreation

The project, as modified, would continue to benefit recreation. The duration of construction would remain the same as previously evaluated in the 2017 ISMND. The modified project would not result in new significant environmental effects or a substantial increase in the severity of effects for recreation previously addressed in the 2017 ISMND. Any potential impact related to recreation would remain less than significant.

3.17 Transportation/Traffic

The purpose of this project is unaffected by the updated bridge alignment and remains to reduce the potential for conflicts between bicyclists, pedestrians, and vehicles within a portion of the SR 162 Corridor and increase mobility options in the community. The modified project would not result in new significant environmental effects or a substantial increase in the severity of effects for transportation/traffic previously addressed in the 2017 ISMND. All impacts related to transportation and traffic would remain less than significant or no impact.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k)?				X
b) Cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.				X

The 2017 ISMND was completed before Energy was added to the Appendix G Environmental Checklist and the AB 52 tribal consultation process was not yet required or completed. As such, tribal cultural resources were not evaluated through the AB 52 process. However, the project is occurring on tribal lands with the support and partnership of RVIT, for the benefit of the tribe. Additionally, a cultural resources evaluation was completed and resulting recommendations were incorporated into the ISMND as mitigation measures (see Section 3.5 – Cultural Resources). With the incorporation of the mitigation measures summarized in Section 3.5 and the ongoing participation of RVIT in the project, impacts to tribal cultural resources are not expected. No impact to tribal cultural resources would result. No additional mitigation measures are required in this Addendum to offset potential impacts related to tribal cultural resources.

3.19 Utilities and Service Systems

As with the 2017 project, the modified project does not require water or wastewater services and would not result in an appreciable increase in impervious surfaces and storm water runoff. The updated bridge alignment is driven by the need to avoid a conflict with the IHS utility sewerage infrastructure. The modified project would not result in new significant environmental effects or a substantial increase in the severity of effects for utilities and service

systems previously addressed in the 2017 ISMND. All impacts related to utilities and service systems would remain less than significant or no impact.

3.20 Wildfire

The 2017 ISMND was completed before Wildfire was added to the Appendix G Environmental Checklist. Hazards related to wildfire were previously evaluated, in part, under Hazards per the prior Appendix G format in 2017. The project would continue to incorporate Mitigation Measure HAZ-2 (Prepare and Implement Fire Safety Plan). Given the update is realigning a bridge that was already part of the project and no new bridge would be added to the project, there would be no measurable change in wildfire risk related to the overall project. No additional mitigation measures are required in this Addendum to offset potential impacts related to wildfire.

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
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?			X	
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?				X
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?				X

As included in the 2017 ISMND under Hazards, Impact h, the project alignment alternatives are located on lands designated both Federal Responsibility Area (FRA) and Local Responsibility Area (LRA) by the California Department of Forestry and Fire Protection (CAL FIRE 2007). California law requires CAL FIRE to identify areas based on the severity of fire hazard that is expected to prevail there. LRA designated lands along both project alignment alternatives include LRA Unzoned, Other Unzoned, Other Moderate, and LRA Moderate. The farther you go in all directions from Covelo and the entire Round Valley the higher the fire hazard severity zone.

a) Substantially impair an adopted emergency response plan or emergency evacuation plan (No Impact)

A review of the Mendocino County Evaluation Plan (Mendocino County 2020) indicates that the proposed shared use pathway would not impair emergency response activities nor established evacuation routes. The Project would not block or alter any roads or pedestrian ways within the project area. No impact would result.

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? (Less than Significant with Mitigation)

Temporary water storage tanks may be used during construction, but no dedicated fire suppression water tanks are proposed. Construction involving heavy equipment, vehicles, power tools, and personnel potentially smoking in and around the project sites could cause the ignition of a wildfire. Although the vegetative characteristics along the project alignment alternatives present only a moderate fire hazard, during warm, dry, and or windy, weather conditions a grass fire originating in the project area could spread quickly to pose a potential risk to surrounding property and people. This would be a significant impact. Thus, Mitigation Measure HAZ-2 was previously incorporated into the project to require the preparation and implementation of a fire safety plan and ensure any potential impacts would be reduced to a less than significant level.

- 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)**

Development of the trail would not result in a need to expand infrastructure to the project area or in the immediate vicinity of the Project. New roads for fire defense, expanded water sources, new power lines, or the development of other utilities would not be required. No impact would result.

- 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)**

The project is located within a low slope area of topography and no steep drainages are located within the project footprint. If a wildfire were to occur, post-fire slope instability would be unlikely. Furthermore, the drainage of the project area is not proposed to change as a result of the project, as previously detailed in Section 3.9 (Hydrology and Water Quality) of the 2017 ISMND. Therefore, no impact would result.

3.21 Mandatory Findings of Significance

This Addendum discusses the topic areas in the sequence as they are addressed in the 2017 ISMND. This section concludes that the project changes, together with changes in circumstances, are not likely to cause a substantial change in impacts and would not result in new significant impacts relative to the previously adopted 2017 ISMND, and mitigation measures are available to reduce these impacts to levels of less-than-significant. The project changes would not result in new significant environmental effects or a substantial increase in the severity of effects related to the mandatory findings of significance previously addressed in the 2017 ISMND.

4. References

California Department of Forestry and Fire Protection (CAL FIRE), 2007, Draft *Fire Hazard Severity Zones in LRA – Mendocino County*, September 24.

Mendocino County. 2020. Mendocino County Evacuation Plan – An Annex to the Mendocino County Emergency Operations Plan, July 2020.

5. List of Preparers

5.1 Mendocino Council of Governments

Nephele Barrett, Executive Director

James Sookne, Regional Project Manager

5.2 GHD

Misha Schwarz, Senior Environmental Scientist

Andrea Hilton, Environmental Planner

Appendix A

Figure 1

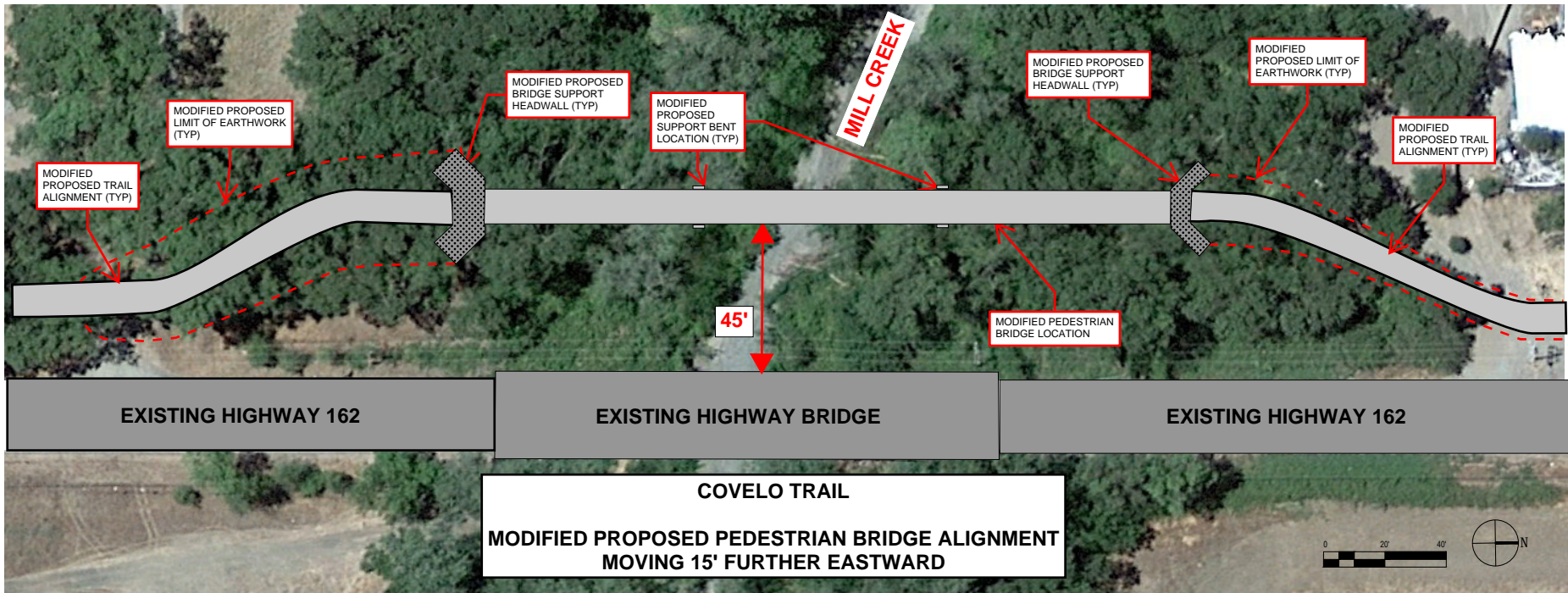
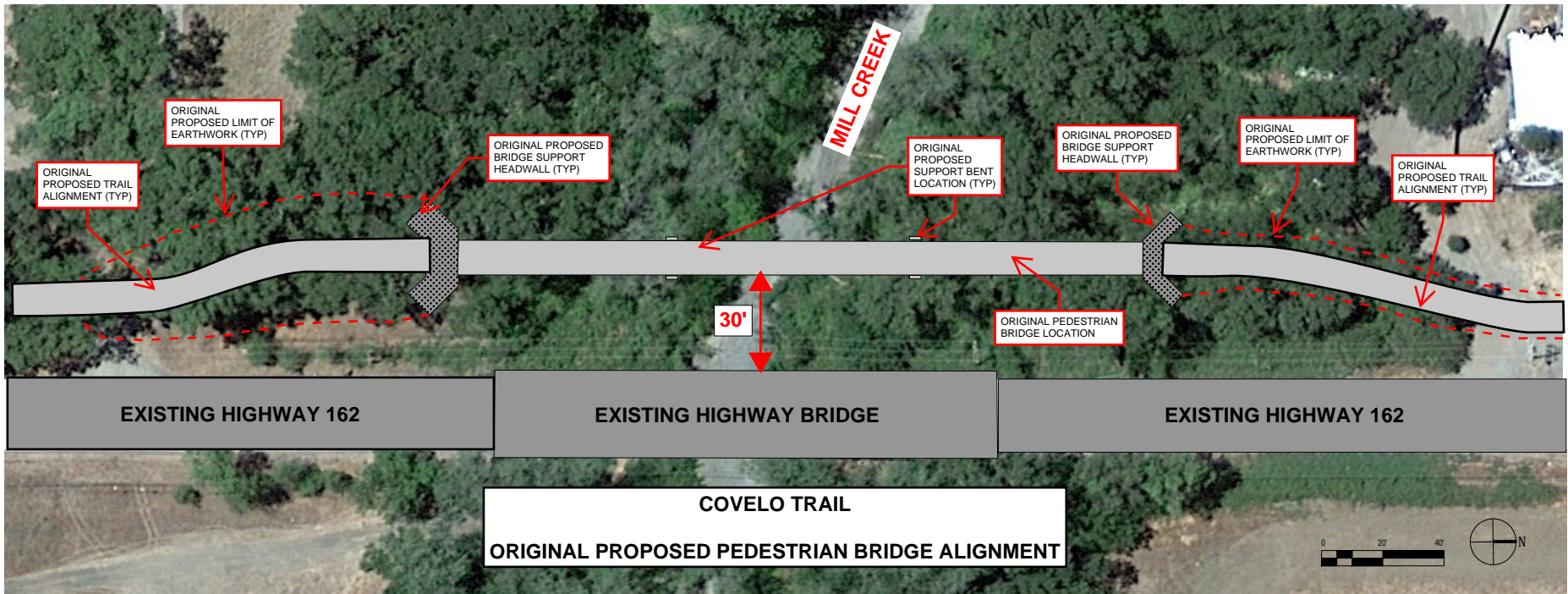


Figure 1