

**ADDENDUM TO THE FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
FORT BRAGG COASTAL RESTORATION AND TRAIL PROJECT
PHASE II PROJECT
June 27, 2018**

I. INTRODUCTION

Pursuant to the provisions of the California Environmental Quality Act (CEQA), the City of Fort Bragg, (City), acting in the capacity of Lead Agency, distributed a Draft Subsequent Environmental Impact Report (State Clearinghouse No.: 2014102014) for the Fort Bragg Coastal Restoration and Trail Project Phase II (Coastal Trail) for public review and comment from November 25, 2014 to January 8, 2015. The Final Subsequent Environmental Impact Report (SEIR) was certified by the City on January 12, 2015.

This Addendum has been prepared to supplement the project description and the analysis in the SEIR. The City has determined that an Addendum is the appropriate subsequent CEQA document for the Coastal Trail Phase III Project per the CEQA Guidelines [Cal. Code Regs., tit. 14, § 15164(b)] because none of the conditions described in Section 15162 of the CEQA guidelines apply. Pursuant to Section 15164(c) of the CEQA Guidelines, this Addendum is not being circulated for public review and comment, but will be attached to the Final SEIR. A Notice of Determination will be filed with the State of California Office of Planning and Research, State Clearinghouse following approval of the Coastal Development Permit.

II. BACKGROUND

The SEIR for the Coastal Trail Project evaluated impacts resulting from restoration, construction of a multi-use trail, installation of pedestrian-only side trails, and installation of related improvements. The restoration encompassed approximately five acres and involved creating locally appropriate native habitats and the importation of approximately 5,000 cubic yards of a mix of sand, soil and composted grain/woodchips for restoration purposes. The multi-use trail is 1.2 miles in length and 8 feet wide, and was constructed on top of existing developed areas throughout the length of the project site.

III. PURPOSE OF ADDENDUM AND CEQA REQUIREMENTS

The purpose of this Addendum is to address the environmental effects of construction of a 600 linear foot extension of the Multi Use Trail between the welcome plaza and Alder Street. As set forth in the Explanation of Significant Differences, in order to determine whether any significant environmental impacts which were not identified in the SEIR would result, or, whether previously identified significant impacts would be substantially more severe. This document has been prepared in accordance with the CEQA Guidelines, [Cal. Code Regs., tit. 14, §15164 and §15162].

The CEQA Guidelines[Cal. Code Regs., tit. 14, §15162(a)] provides that, for a project covered by a certified Environmental Impact Report (EIR) or adopted negative declaration, preparation of a

subsequent EIR or negative declaration rather than an Addendum is required only if one or more of the following conditions occur:

1. *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration 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 revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of the 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 of the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:*
 - a) *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
 - b) *Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;*
 - 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 EIR or negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measures or alternative.*

Cal. Code Regs., tit., § 15164(a) and (b) of the CEQA Guidelines state:

- (a) *The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*
- (b) *An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.” (underline added)*

Based on the analysis presented herein, it has been determined that an Addendum to the SEIR is the appropriate CEQA document to address the CDP Coastal Trail Phase III project given that none of the conditions described in the CEQA Guidelines [Cal. Code Regs., tit. 14, § 15162]

calling for the preparation of a subsequent EIR or negative declaration have occurred, but that there are changes and additions necessary to attach to the certified SEIR. The environmental analysis relies on the analyses completed in the SEIR and directly references the SEIR where appropriate.

IV. APPLICATION OF PREVIOUSLY CERTIFIED ENVIRONMENTAL DOCUMENTATION TO Coastal Trail Phase III Project

Description of Coastal Trail Phase III

The proposed project would consist of the installation of approximately 600 linear feet of a 12 foot wide asphalt trail that connects the Fort Bragg Coastal Trail project to downtown Fort Bragg via Alder Street and associated signage and property line fencing (Figure 1). The proposed project would include limited removal of existing paved areas, some grading and installation of the trail. The project would also include installation of property line fencing and limited signage (welcome sign and rules signs).



Figure 1: Coastal Trail Phase III project (illustrated in blue). And a portion of the Phase II Coastal Trail Project illustrated in black

Environmental Impact Analysis

As noted previously, the construction of Phase III of the coastal trail was not included in the SEIR. However, the activities of the Coastal Trail construction project will not impact the following issue areas and there will be no change to the analyses and findings presented in the SEIR: aesthetics, agricultural resources, geology and soils, land use and planning, mineral

resources, population and housing, public services, recreation, and utilities and service systems. In addition, the Phase III Coastal Trail project will have no new significant impacts associated with: air quality and greenhouse gases (GHGs), biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, noise, and transportation and traffic. Therefore, the impacts associated with the Coastal Trail Phase III project for these issue areas will be within the scope of impacts identified in the SEIR, as described below.

A. Cultural Resources

The SEIR concluded the project's impact on Cultural Resources was less than significant with mitigation incorporated. The Mill Site includes an archaeologically sensitive area, as the Fort Bragg Native American Archaeological District reflects persistent and intensive Native American use of two sites found within the Coastal Trail project area. The archaeological district is also a Traditional Cultural Property for members of the Sherwood Valley Rancheria. Given the sensitivity of the area, there is some potential for archaeological resources to be discovered during construction activities. The Georgia-Pacific Lumber Mill property is not eligible for listing in the CRHR or NRHP as a historic district, as 21 of the 22 historic district contributors have been demolished since 2003. There are also no remaining historic buildings within the project site.

Due to the presence of tribal cultural resources, the City engaged in consultation with the Sherwood Valley Band of Pomo Indians (SVBP) in 2012, 2013, 2014 and 2016 regarding Phase I and Phase II of the Coastal Trail project.

The project site has no known cultural resource or cultural resource sites. Never the less as the project will include ground disturbing activities Mitigation Measure were identified in the SEIR to reduce the potential impacts to a less-than-significant level and mitigation measures 2.5, 2.6, 2.7 & 2.8 are relevant to the proposed project as noted below. Additionally MM 2.7 has been made more restrictive than the SEIR by requiring Native American Monitors for all ground disturbing activities, not just those involving undisturbed soils.

Mitigation Measure 2.5: The tribal monitors will be notified at least three weeks in advance of ground disturbing construction activities within ESA to ensure they will be available to monitor/review installation of ESA protection fencing.

Mitigation Measure 2.6: One week prior to initiating any native soils disturbance in non-fill areas, SVR and Native American Monitors will be notified.

Mitigation Measure 2.7: Native American monitors will be required where ground disturbing activities occur.

Mitigation Measure 2.8: The Community Development Director will notify the State Historic Preservation Officer within 48 hours of any ESA violation or unanticipated discovery to determine how it will be addressed. Consultation with Native Americans shall also be included.

B. Hazards and Hazardous Materials

The SEIR concluded that the Coastal Trail project's potential to expose visitors to hazardous substances within the soil and sediment would be a less-than-significant impact. In addition, any potential impacts to construction workers for the Coastal Trail project would be mitigated through compliance with the DTSC-approved Soil Management Plan for the site. Other hazardous materials may be handled during fueling and servicing of construction equipment, but the SEIR concluded that no adverse impacts would result. Additionally, since completion of the SEIR, the department of Toxics and Substances Control (DTSC) has determined that the area proposed for the Coastal Trail Phase III project has been remediated to a level that would accommodate unrestricted use and is under consideration for a no further action determination. Therefore, the proposed project would not expose people or the environment to a significant hazard related to hazardous materials sites subject to Cortese List requirements. The following Mitigation Measures from the SEIR are relevant to the project:

Mitigation Measure 8: DTSC may require, through its CEQA document for the RAP for Operable Unit E, that construction projects which include grading must comply with a Soil Management Plan (SMP) prepared for the site. Compliance with the SMP will also be a condition of approval for the grading permit for the site.

C. Air Quality and Greenhouse Gas Emissions

The SEIR noted that Mendocino County is considered a non-attainment area for particulate matter less than 10 microns in size (PM₁₀) under the California Clean Air Act standard. However, the SEIR concluded that the dust generated during construction and grading activities and construction period air pollutant emissions for the development of the proposed project would not exceed criteria pollutant daily emissions thresholds established by the Mendocino County Air Quality Management District (MCAQMD) or the Federal Environmental Protection Agency (EPA). The SEIR concluded that Coastal Trail project activities are in accordance with the existing MCAQMD plans and rules, and also determined that there is no impact with regard to exposure of sensitive receptors to substantial objectionable odors. The SEIR provided Mitigation Measure 9 to reduce any impacts to PM₁₀ to a less-than-significant level.

The SEIR concluded that the Coastal Trail project activities will contribute a relatively small amount of Green House Gas (GHG) emissions; however the amount is not significant. Operationally while there is parking associated with the multi-use trail project, it will not result in additional vehicular trips, as people who seek to use the Coastal Trail would park in one of the proposed existing lots, absent the proposed project.

Therefore the project is not anticipated to have new or additional impacts on Air Quality of Green House Gas Emissions. The following Mitigation Measure from the SEIR applies to the Coastal Trail Phase III project.

Mitigation Measure 9: The project contractor, on behalf of the project applicant, shall prepare a dust control plan for construction activities at the project site pursuant to the requirements of the MCAQMD. The project contractor shall be responsible for ensuring that

all adequate dust control measures are implemented in a timely manner during all phases of construction and maintenance activities at the project site. The dust control plan shall include, at minimum, the following measures:

- a. Water shall be applied by means of truck(s), hoses, and/or sprinklers as needed prior to any land clearing or earth movement to minimize dust emissions.
- b. All material excavated, stockpiled, or graded shall be sufficiently watered to prevent fugitive dust from leaving the property boundaries or causing a public nuisance of an ambient air standard. Watering should occur at least twice daily, however frequency of watering shall be based on the type of operation, soil, and wind exposure.
- c. All on-site vehicle traffic shall be limited to a speed of 15 miles per hour (mph) on unpaved roads.
- d. All trucks hauling soil, sand, or other loose materials on public roads will be covered or required to maintain at least 2 ft. of freeboard.
- e. Excavation and grading activities shall be suspended when sustained winds exceed 25 mph, instantaneous gusts exceed 35 mph, or dust from construction might obscure driver visibility on public roads.
- f. All inactive portions of the construction site, including soil stockpiles, shall be covered, seeded, or watered until a suitable cover is established.
- g. Paved areas adjacent to construction sites (e.g. the abandoned runway) shall be swept or washed as required to remove excess accumulations of silt and/or mud, which may have resulted from grading and construction activities at the project site.

D. Biological Resources

The SEIR concluded that there were less-than-significant impacts to Environmentally Sensitive Habitat Areas (ESHAs), three special-status plant species with known populations within the Biological Study Area (BSA), 10 special-status animal species and/or types, and nesting birds protected under the federal Migratory Bird Treaty Act. All impacts included associated mitigation to result in a determination of less than significant.

The BSA, which includes the project site, was identified as containing United States Army Corps of Engineers (USACE) jurisdictional wetlands, potential USACE wetlands, drainages, riparian areas under California Department of Fish & Wildlife (CDFW) jurisdiction, and California Coastal Commission wetlands. In addition, eight acres of ESHA wetlands were found within the Study Area, however the Coastal Trail project was designed to avoid the wetlands and any impacts were not reviewed in the SEIR. Temporary staging areas will be located within areas which are paved and part of or immediately adjacent to the project site.

The Coastal Trail Phase III project would be located on areas of asphalt and heavily disturbed non-native vegetation composed primarily of weeds. The project site does not include and is not adjacent to any environmentally sensitive habitat area. None of the proposed activities are located within or adjacent to any wetlands. The trail corridor is located at its closest point 250 feet from any wetland.

Therefore, the Phase III project will not alter the impact findings for biological resources presented in the SEIR. The inclusion of the following mitigation measures will provide clarifying

information for construction activities related to the implementation of the Phase III project:

Mitigation Measure 14: During construction, to control erosion during and after project implementation, the applicant and contractors will implement standard Best Management Practices (BMPs)

Mitigation Measure 15: During construction, the cleaning and refueling of equipment will occur only within a designated staging area and at least 65 ft. from wetlands, other waters, or other aquatic areas. This staging area will conform to BMPs applicable to attaining zero discharge of stormwater runoff. At a minimum, all equipment and vehicles will be checked and maintained on a daily basis to ensure proper operation and avoid potential leaks or spills.

E. Hydrology and Water Quality

The SEIR concluded that there would be no impact to water quality standards, waste discharge requirements, and the project would not otherwise substantially degrade water quality. In addition, there would be no alteration of the existing drainage pattern of the Site, contribution of runoff which would result in exceeding the capacity of existing or planned stormwater drainage systems, or contribution of substantial additional sources of polluted runoff. The project site is located within a 500 year floodplain, except for the beach berm and the beach which are subject to Flood Zone V, consisting of coastal flood with velocity hazard (wave action). To mitigate for potential impacts that would expose people to potential coastal flooding, the SEIR includes measures to install signage to warn people of high surf conditions during storm events along all improvements on the Beach Berm, and to temporarily close the berm section of the project trail and access to the beach in high surf conditions.

The proposed project would result in a net reduction of impervious surfaces and thus should improve stormwater infiltration. Additionally the project will not result in significant grading or disturbance of existing stormwater flows. Therefore the project will not have a significant impact on stormwater releases and no additional mitigations are required.

F. Noise

The SEIR concluded that noise generated by the proposed Coastal Trail project would be short term and construction-related (paving, haul trucks for restoration materials, etc.). Construction will not include pile driving or use of explosives for demolition, activities which are most likely to exceed noise thresholds and result in intensive vibration. No long term noise impacts would result from the proposed project, and no mitigation measures are required. Therefore, there is no impact with regard to noise.

The proposed Phase III construction project will be short in duration and the hours of operation will be limited to 7:30am and 5:00pm. Noise from the associated activities will comply with the City's Noise Ordinance; therefore, the increase in ambient noise levels associated with construction of the proposed project is expected to be minimal and is considered less than significant.

G. Transportation and Traffic

The SEIR concluded that the Coastal Trail project activities would result in no impact with regard to transportation and traffic. The project will not provide any direct automobile access or additional parking for the site, and would not create a substantial increase in traffic in relation to existing traffic load and capacity or exceed a level of service standard for congestion of roadways. It was concluded that activities would not interfere with emergency access, result in inadequate parking capacity, or conflict with alternative transportation.

The Final SEIR did not include an analysis of the vehicle trips to a new parking lot at the western terminus of Alder and Oak Streets. The proposed project is anticipated to attract 50 vehicles per hour at peak use times based on use levels at the other two parking lots and the relatively less picturesque access available from this entrance. Further the vehicular access will be split between the two intersections with about 35 vehicles/hr. accessing the site from Oak Street and 15 vehicles/hr. accessing the site from Alder street.

- The Oak Street intersection at highway 1 is signalized and operates at a LOS of A. Thirty-five additional vehicles per hour through this intersection will not have a significant impact on this Level of Service.
- The Alder Street intersection is not signalized. The current LOS at the Alder Street intersection is level B. The addition of 15 vehicles/hr to this intersection will not reduce the LOS.

Therefore, the Coastal Trail Phase III Project will not alter the impact findings for transportation and traffic presented in the SEIR.

IV. CONCLUSION

The Coastal Trail Phase III project will not alter the impact findings and mitigation measures for air quality and GHGs, biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, noise, and transportation and traffic presented in the SEIR. With adoption of the mitigation measures outlined above for this project, there will be no new significant impacts and no substantial increase in the severity of any impacts identified in the SEIR. The mitigation measures which are included in Section III are measures which address an impact already reviewed and mitigated within the SEIR. Therefore, the impacts for the OU-E RAW are within the scope of impacts identified in the SEIR, and the SEIR adequately addressed all potentially significant environmental impacts of the project.

Based on the above, an Addendum is the appropriate CEQA document for the Coastal Trail Phase III project pursuant to the CEQA Guidelines [Cal. Code Regs., tit. 14, § 15164(b)] because none of the conditions described in Section 15162 of the CEQA Guidelines calling for the preparation of a subsequent EIR or negative declaration have occurred. This addendum has appropriately disclosed the potential impacts from the Coastal Trail Phase III project and will be included as part of the CEQA record for the Coastal Restoration and Trail Project. A Notice of Determination for this Addendum to the SEIR will be filed with the California State Clearinghouse within the State of California Office of Planning and Research.

CERTIFICATION

I hereby certify that the statements furnished above and in the exhibits, attached or incorporated by reference, present the data and information required for this evaluation to the best of my ability and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

Signature

Date

Marie Jones, Community Development Director