ADDENDUM To MITIGATED NEGATIVE DECLARATION

Fort Bragg Coastal Trail Phase I – Glass Beach Stairs Replacement

INTRODUCTION

The City of Fort Bragg City Council approved Coastal Development Permit (CDP 1-17), Design Review (DR 1-17) to complete the Glass Beach Stairs Replacement. The MND evaluated the impacts of new construction of replacement stairs for access to the Glass Beach of Noyo Headlands Park. The project analyzed in the MND included a concrete stair set elevated on four sets of pilings. The project included construction of a concrete stair bulwark at the western terminus of the stairs on the beach.

The City of Fort Bragg proposes to replace a set of cable stairs that was installed as part of the original Phase I Coastal Trail project and under the environmental review provided by the 2011 SEIR. The replacement stairs would located be relocated approximately 50 feet to the north in an area with fewer sensitive resources and less slope. The replacement stairs would be constructed out of gabion baskets with rock and/or earthen stairs with redwood stops for 80% of the length. The last 20% would consist of concrete stairs.

This Addendum addresses these modifications to the project design.

STATUTORY BACKGROUND

Under the California Environmental Quality Act (CEQA), an Addendum to a MND is needed if minor technical changes or modifications to the proposed project occur (CEQA Guidelines §15164). In addition, pursuant to CEQA Guidelines §15162, preparation of an Addendum to an MND is appropriate unless subsequent changes are proposed in the project, physical circumstances have changed on the subject property, or new information of substantial importance becomes available and this results in new significant impacts or a substantial increase in the severity of previously identified significant impacts.

The Addendum need not be circulated for public review (CEQA Guidelines § 15164[c]); however, an addendum is to be considered by the decision making body prior to making a

decision on the project (CEQA Guidelines §15164[d]).

This MND Addendum demonstrates that the environmental analysis, impacts, and mitigation requirements identified in the *Fort Bragg Coastal Trail Phase I – Glass Beach Stairs Replacement MND* remain substantively unchanged by the revised project.

The Addendum supports the finding that the proposed project does not result in any new impacts and does not exceed the level of impacts identified in the MND due either to project modifications, physical changes on the property or new information. Indeed the project impacts would be reduced with the revised project.

EVALUATION OF MODIFICATION

The *Fort Bragg Coastal Trail Phase I – Glass Beach Stairs Replacement MND* was certified on March 8, 2017 and evaluated the environmental impact of installation of a concrete stair set elevated on four sets of pilings, and a concrete stair bulwark at the western terminus of the stairs on the beach.. The MND identified a range of potential impacts from the project including potential impacts to wetlands, nesting birds, shoulderband snails, red-legged frogs and cultural resources. All of these potential impacts were mitigated to a less than significant impact by requiring the implementation of mitigation measures.

SUMMARY AND FINDINGS

In preparing this Addendum, all of the potential impacts identified in the MND were reconsidered. For all impact areas, staffs review indicates that the proposed project modifications are consistent with the original project description;

- 1. No physical changes on the property have occurred that would change the environmental analysis;
- 2. There has there been no new information put forth that would change the environmental analysis.
- 3. Traffic, transportation/circulation, air quality, noise and other environmental conditions have not changed significantly since the <u>MND</u> was certified on March 8, 2017.
- 4. The new location includes wetlands within 100 feet of the proposed project site, however impacts to wetland will be eliminated in the revised design.

- 5. Significant impacts to special status plants or plant communities and no new mitigation measures are required.
- 6. The new location is screened from public views by existing vegetation and so the project will not have a significant effect on visual resources and no new mitigation measures are required.
- The new location has been surveyed for cultural resources and none have been found, so there will be no new impacts on cultural resources and no additional mitigation measures are required.

Therefore, the project would have no new impact(s) not already identified in the Mitigated Negative Declaration, nor would it result in a substantial increase in the severity of previously identified significant impacts. In summary, the analysis concludes that none of the conditions described in Section 15162 of the CEQA Guidelines calling for preparation of a subsequent Negative Declaration have occurred, and thus an Addendum to the MND is appropriate to satisfy CEQA requirements for the proposed project.

This addendum is written as an addition to the Mitigated Negative Declaration, adopted March 8, 2017. A copy of this document is available for review at the Fort Bragg City Hall, 416 N Franklin Street Fort Bragg, California, 95437.