

Revised Addendum #2 to 2023 Subsequent Mitigated Negative Declaration

**Water System Reconstruction Project-
Water Supply and Storage Improvements
SCH No. 2020080439**

Mendocino Unified School District

5 May 2026, Revised 14 July 2026

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1. Introduction

After posting Addendum #2 with CEQANet in May of 2026, the County of Mendocino requested a clarification to Mitigation Measure BIO-7 Minimize Impacts to Aquatic Resources. This revised Addendum #2 reflects the requested clarification. For ease of reference, text modifications are shown in underline.

1.1 Project Background

The Mendocino Unified School District (MUSD) owns, operates and maintains a potable and fire water system to serve its K-8 School, High School and District Office, as well as Friendship Park, the Community Center of Mendocino, and a number of irrigation areas affiliated with these primary consumers. The water supply and storage site is located at 44020 Little Lake Road in Mendocino County (see Figure 1, Vicinity Map).

A previous inspection conducted by the State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW) identified several system deficiencies, and key components of the MUSD's water system infrastructure have reached the end of their useful life. The MUSD prepared a Water System Plan Report to address water system deficiencies and to evaluate alternatives for water sources, water storage and water treatment design. Based on the Water System Plan Report, the MUSD plans to improve its potable water system assets and operations to meet regulatory requirements. Improvements to meet long-term service needs include providing sufficient storage to meet NFPA and California Fire Code requirements, providing water supply redundancy, and protecting the integrity of the water system by replacing assets beyond their service life to ensure the health and safety of students, faculty and public who rely upon the potable and fire water system. Specifically, the MUSD plans to deconstruct and replace its two existing water storage tanks with new water storage tanks that meet current seismic design standards and provide sufficient storage capacity for the recommended operational, emergency and fire storage. The MUSD would also replace their existing water treatment building, redevelop/reconstruct two existing groundwater supply wells, convert one existing test well to an operational groundwater supply well, and construct a new access driveway.

Additionally, in 2022, the Mendocino City Community Services District (MCCSD), in cooperation with the MUSD, received a grant in response to a drought scenario from the State of California Department of Water Resources through the Urban and Multibenefit Drought Relief (UMBDR) grant program to help serve community emergency water needs. The UMBDR grant Agreement identifies the MUSD and MCCSD as Implementing Agencies and includes the development of potable water storage at the MUSD's water supply and storage site, and the drilling of new groundwater test wells at the MUSD's water supply and storage site to explore the viability of additional water supply for emergency purposes. Viable wells would also help to meet source production and supply reliability required by the Division of Drinking Water.

On June 28, 2023, the MUSD adopted a Subsequent Mitigated Negative Declaration (Subsequent MND) and Mitigation Monitoring and Reporting Program pursuant to the California Environmental Quality Act (CEQA). Following adoption of the Subsequent MND, the MUSD obtained a Coastal Development Permit for the project, which was approved by the County of Mendocino Department of Planning and Building Services (U_2023-0004). As part of the ongoing water project, two groundwater test wells were installed along the property frontage at the MUSD's water supply and storage site located at 44020 Little Lake Road in the Mendocino community. The test wells were installed to evaluate the viability of water source capacity and redundancy, a key issue identified by the Division of Drinking Water for the MUSD's water system. Based on the findings, the MUSD proposed converting one of the test wells into a permitted production well to serve as a supplemental source and to fill fire protection and water supply storage tanks during the wet season, without increasing overall water use.

The improvements carried out to date and the proposed conversion of a test well are adequately covered by the previously adopted Subsequent MND, and the MUSD has applied for a Coastal Development Permit Amendment for the proposed well conversion.

1.2 Proposed Minor Modifications

As part of the Coastal Development Permit Amendment (CDP) process and associated resource permitting requirements, MUSD is proposing a modification to the approved project consisting of a stream restoration component. During review of the CDP application, the California Department of Fish and Wildlife (CDFW) and the Regional Water Quality Control Board (RWQCB) requested the on-site stream be restored and daylighted from decades old modifications that had included undergrounding of the stream via a pipe and culvert system. This modification was developed through coordination and consultation with California Department of Fish and Wildlife and responds to proposed conditions of approval identified during CDP review. The proposed restoration would reroute and restore an existing watercourse on the MUSD property to establish a new open channel intended to improve channel stability, continuity, and overall stream function. This restoration component constitutes a modification to the previously approved project and is the subject of this Addendum. The project additions are described in Section 2 of this Addendum.

1.3 Purpose of Addendum

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 of this Addendum.

2. Project Modification

The following project modifications have been proposed since adoption of the first Addendum of the Subsequent MND, in response to a proposed condition of approval for a Coastal Development Permit Amendment. These modifications consist of a restoration component that was developed in coordination, and requested through consultation with, CDFW as part of the Coastal Development Permit Amendment and resource permitting and approval requirements.

2.1 Proposed Channel Reroute and Restoration

The project site includes two unnamed watercourses, referred to as WC1 and WC2 (see Figure 2 Delineated Aquatic Resources). WC1 and WC2 merge on site and eventually drain to Slaughterhouse Gulch off site. WC2 originates from a headwater swale and forms a narrow channel with generally perennial flow that increases during rain events. Downstream of the swale, WC2 has been culverted in multiple locations and re-aligned in a straight, engineered configuration, including a combination of open channel segments, buried pipes, and culverts. WC2 would be rerouted and restored (see Figure 3 Existing and Proposed Aquatic Resources) to improve channel function and continuity. Approximately 145 linear feet of new open channel would be constructed along a northwest alignment, as shown on the project plans (Attachment 1, Restoration Plan Set). There are three existing culverts along WC2. The reroute would begin immediately upstream of the second downstream culvert and would reconnect with WC1 just downstream of the third downstream culvert.

Construction Activities and Culvert Abandonment

Construction activities associated with the reroute and restoration would include excavation and grading to form the new channel alignment. Temporary disturbance would occur within the existing channel at the upstream and downstream connection points. The channel would be constructed from downstream, and progress to the upstream connection point. A temporary silt fence would be installed at the upstream end of the restored channel and around the upstream culvert entrance to filter any sediment generated during construction. Following completion of the rerouted channel, the abandoned culvert would be sealed and decommissioned, and the existing drainage ditch adjacent to the Maintenance Building would be filled and revegetated, consistent with the Restoration Plan.

2.2 Restoration Planting and Site Stabilization

Following construction, disturbed areas would be scarified to a depth of approximately three inches. A two-inch layer of organic, weed-free compost would be applied and incorporated into the soil, followed by light compaction and seeding with approved native upland and channel seed mixes. Approximately seven trees and 33 shrubs would be planted along both sides of the restored channel, and approximately 115 sedges would be installed within the channel. The detailed restoration and planting plan is provided in Attachment 1.

2.3 Monitoring and Compliance Measures

Monitoring of planted areas would occur for a five-year period to verify 80% survival rate of the trees and shrubs at the end of the monitoring period. If the survival rate falls below 80%, replacement trees and shrubs would be planted. Standard best management practices to prevent erosion and control sediment from entering the stream would be implemented before, during, and after construction. All work would be conducted in accordance with applicable regulatory agency permit conditions to minimize impacts to aquatic resources and wildlife and to ensure long-term channel stability.

2.4 Clarification to Mitigation Measure BIO-7

To protect onsite aquatic resources, the Subsequent MND included Mitigation Measure BIO-7, which requires aquatic resource buffer zones and prohibits earthwork within 50 feet of aquatic resources. As described above, following adoption of the Subsequent MND, MUSD developed a stream restoration component in coordination with CDFW and RWQCB as part of the Coastal Development Permit Amendment process (UM 2025-0004), which would reconstruct and restore portions of an existing watercourse and therefore requires earthwork within and adjacent to the aquatic resource area.

MUSD is modifying Mitigation Measure BIO-7 to clarify the buffer is not applicable to the restoration work while continuing to protect aquatic resources through agency oversight, permit conditions, avoidance and minimization measures, erosion and sediment controls, monitoring requirements, and restoration success criteria. MUSD finds that the modified measure is equivalent to or more effective than the original measure in mitigating impacts to aquatic resources and would not result in a potentially significant environmental effect.

Therefore, the following clarification is added to Mitigation Measure BIO-7:

Mitigation Measure BIO-7: Minimize Impacts to Aquatic Resources

A buffer zone shall be established adjacent to intermittent watercourses, wetlands, and associated riparian vegetation at the Project site in accordance with Mendocino County Coastal Zoning Code Section 20.496.020. Earthwork shall not occur within 50 feet of an aquatic resource, excluding the channel restoration work as approved and conditioned by the California Department of Fish and Wildlife and other responsible regulatory agencies. Earthwork within 100 feet of any aquatic resource shall adhere to standard methods of erosion and sediment control and, if possible, shall be completed during the dry season (April 15-October 15) to reduce sediment load downstream. Earthwork shall be halted during and 24 hours after a qualifying rain event (0.5 inches of precipitation over 24 hours).

3. **Analysis of Potential Environmental Effects**

The proposed project modifications would result in the restoration and rerouting of an existing degraded watercourse, including the construction of approximately 145 linear feet of new open channel. These changes are restorative in nature and are intended to improve channel function, continuity, and ecological conditions relative to existing on-site conditions. Construction activities associated with the proposed modifications would result in short-term, temporary impacts related to excavation and grading to establish the new channel alignment, as well as limited disturbance at the upstream and downstream connection points to the existing channel.

Temporary erosion and sediment control measures would be implemented during construction to minimize the potential for sediment generation and off-site transport. These measures would include installation of a temporary silt fence near the upstream connection point and culvert entrance, as well as implementation of best management practices during grading, channel construction, and culvert abandonment. Temporary disturbance would also occur during site restoration activities following construction, including soil scarification, compost application, revegetation, and planting.

The temporary impacts associated with the proposed modifications are primarily related to restoration activities intended to re-establish native vegetation and stabilize disturbed soils. Upon completion of construction and revegetation, disturbed areas would be restored with native upland and channel vegetation, including trees, shrubs, and sedges, consistent with the approved Restoration Plan. Monitoring of restoration areas would occur for a five-year period to ensure successful establishment and long-term stability.

Overall, the project area would be left in an improved condition compared to existing conditions. The restored open channel and revegetated areas would provide enhanced ecological function, improved hydrologic connectivity, and increased habitat value relative to the existing engineered and culverted configuration. The proposed modifications do not introduce new land uses, intensify site development, or expand the project footprint beyond what was previously evaluated.

The minor modification to Mitigation Measure BIO-7 provides clarification that the buffer does not apply to the channel restoration, while still remaining applicable to the original project as intended. Work associated with the channel restoration would conform to the Avoidance and Minimization Measures established in EPIMS-MEN-66299-R1C, including restricted work periods and stream protections. As noted in Section 2.2, once the rerouting and regrading are complete, the disturbed areas would be planted with appropriate riparian vegetation.

The proposed project modifications would not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts related to aesthetics, air quality, biological resources, cultural resources, paleontological resources, hazardous materials, hydrology and water quality, tribal cultural resources, wildfire, or other environmental topics addressed in the Subsequent MND. No new mitigation measures beyond those identified in the adopted Subsequent MND are required to address the proposed restoration activities. No changes in circumstances or new information of substantial importance have been identified that would trigger the need for additional environmental review. MUSD finds that the revised Mitigation Measure BIO-7 is equivalent to or more effective than the original mitigation measure in avoiding or reducing impacts to aquatic resources.

In summary, the proposed project modifications are restorative in nature, would result in temporary and fully mitigated construction-related impacts, and would ultimately improve site conditions compared to the existing environment. The project changes do not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Based on these findings, an Addendum to the adopted Subsequent MND is appropriate to meet CEQA requirements for the proposed project modifications, reflecting the analysis by MUSD as the CEQA lead agency.

4. List of Preparers

4.1 Mendocino Unified School District

Jason Morse, Superintendent

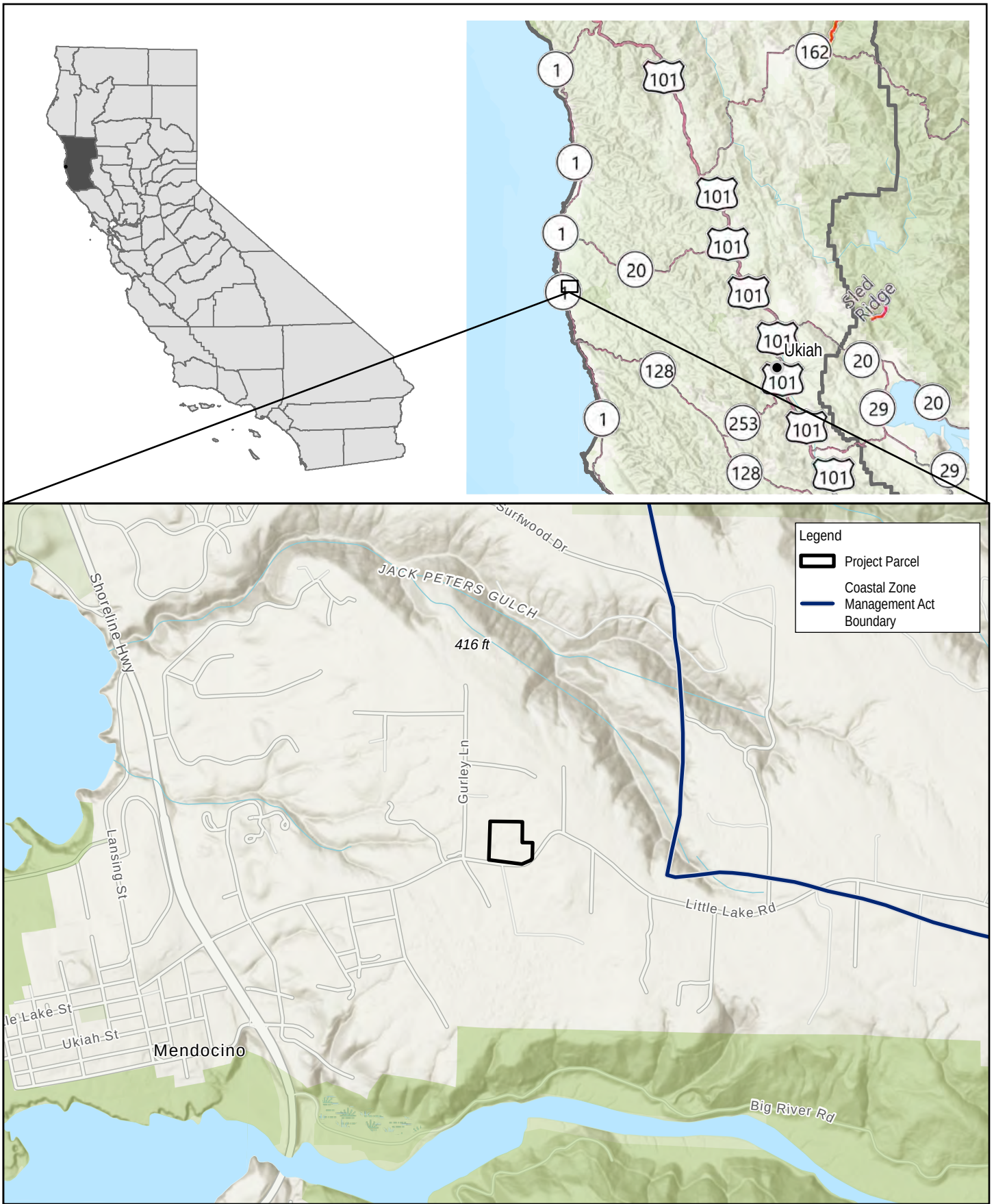
4.2 GHD

Matt Kennedy, Project Manager

Kristine Gaspar, Senior Environmental Planner

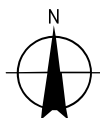
Brian Bacciarini, Quality Control Review

Kunal Kardile, Environmental Planner



Paper Size ANSI A
0 500 1,000 1,500 2,000
Feet

Map Projection: Mercator Auxiliary Sphere
Horizontal Datum: WGS 1984
Grid: WGS 1984 Web Mercator Auxiliary Sphere



Mendocino City CSD
PW Drought Tolerance Supply
and Storage Improvements

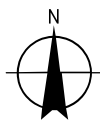
Project No. 12584992
Revision No. -
Date September 2024

Vicinity Map

FIGURE 1



Paper Size ANSI A
0 20 40 60 80 100
Feet



Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
Grid: NAD 1983 StatePlane California II FIPS 0402 Feet

Mendocino City CSD
PW Drought Tolerance Supply
and Storage Improvements

Project No. 12584992
Revision No. -
Date September 2024

Delineated Aquatic Resources

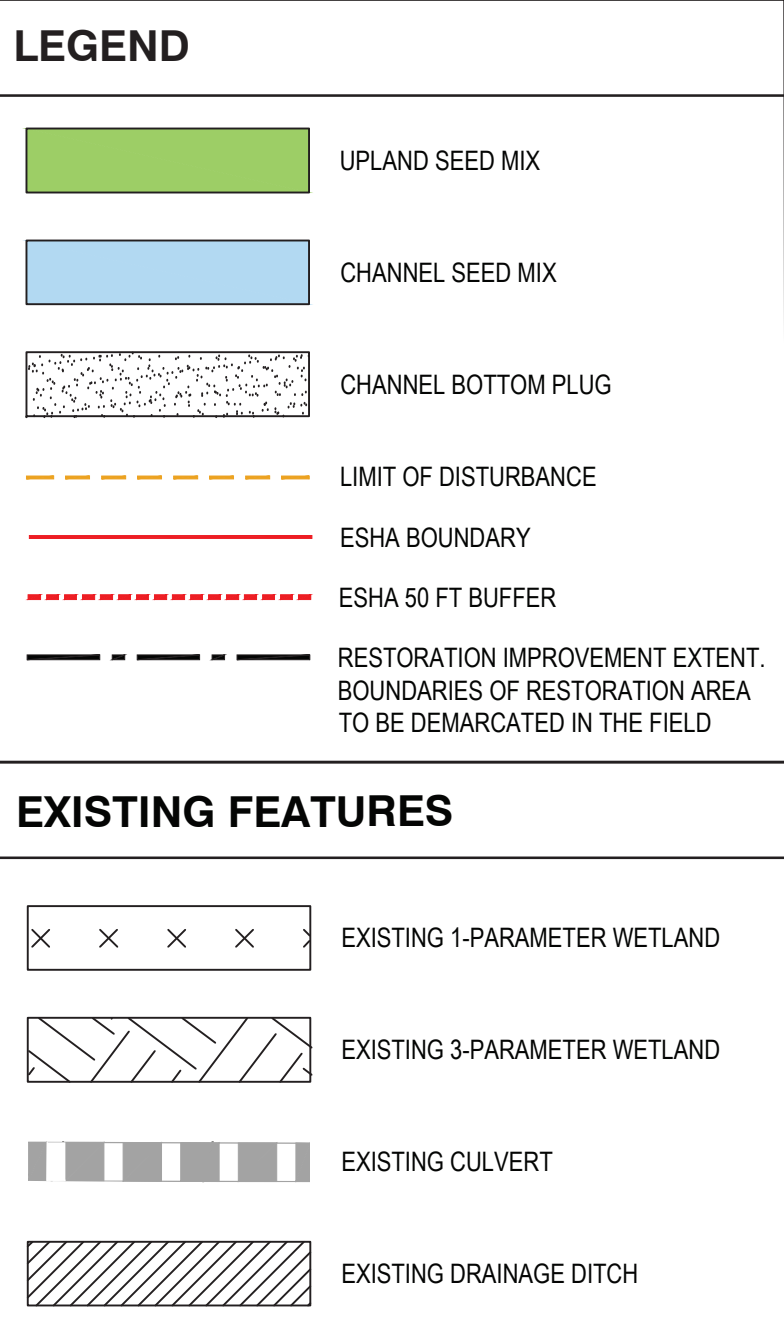
FIGURE 2



Existing & Proposed Aquatic Resources

FIGURE 3

Attachment 1: Restoration Plan Set



- THE CHANNEL WAS DESIGNED TO PREVENT SCOUR DURING PEAK FLOW EVENTS.
- PEAK FLOWS WERE DETERMINED BASED ON THE MAX. FLOW CAPACITY OF THE UPSTREAM CULVERT (6" DIA.), WHICH WAS DETERMINED TO BE 2 CFS.
- THE RESULTING VELOCITY (2.8 FT/SEC) AND SHEAR STRESS (1.1 LB/FT²) WERE USED TO DETERMINE THE APPROPRIATE CHANNEL LINING.
- THE RESULTING DEPTH OF FLOW (<6") RESULTS IN SUFFICIENT FREEBOARD TO PREVENT OVERTOPPING.

SEE LP-501 FOR PLANT AND SEED MIX SCHEDULES, DETAILS, AND NOTES.

PLANT PLUGS AT BOTTOM OF CHANNEL PRIOR TO SEEDING.

SEED SIDE SLOPE OF CHANNEL PRIOR TO PLACEMENT OF FILTER FABRIC.

SOIL SHALL BE AMENDED PER SOIL PREPARATION NOTES, DRAWING LP-501.

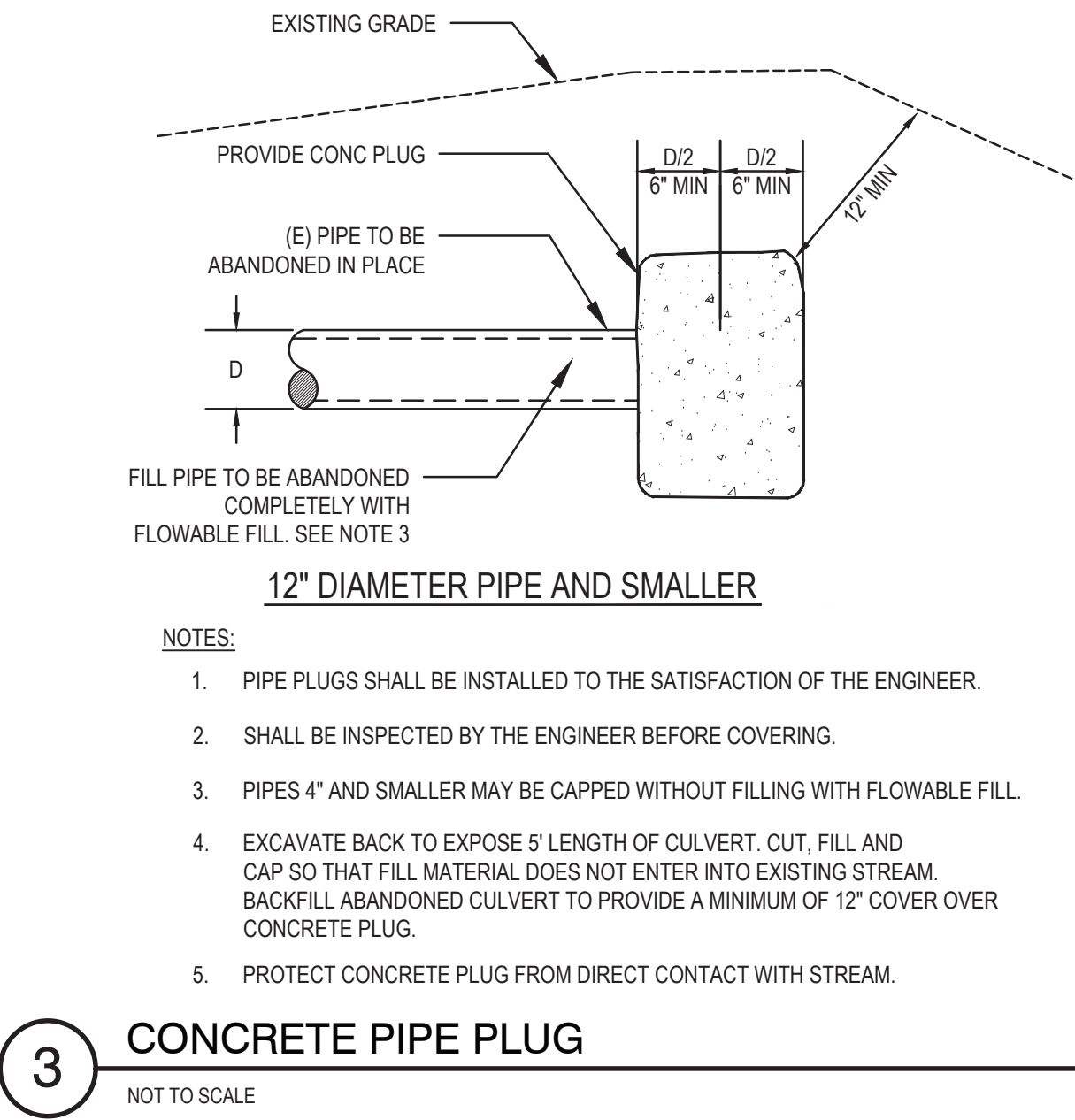
DEMARCATÉ PLANTING AND SEEDING ZONE BOUNDARIES IN THE FIELD PRIOR TO PLANTING AND SEEDING OPERATIONS. PLANTING MAY NOT PROCEED UNTIL REVIEW AND APPROVAL.

PRIOR TO SEEDING, ALL SEEDING AREAS SHALL BE DE-COMPACTED IN ACCORDANCE WITH SOIL BED PREPARATION AND SEEDING NOTES, DRAWING LP-501.

CONTRACTOR TO PROTECT IN PLACE ALL EXISTING NATIVE TREES AND SHRUBS WITHIN THE RESTORATION AREA AND USE FLAGGING TO IDENTIFY THESE INDIVIDUALS IN THE FIELD.

PLANTING TO OCCUR AFTER THE FIRST SEASONAL RAINS HAVE SATURATED SOILS BEYOND THE FIRST SEVERAL INCHES (NOVEMBER/DECEMBER) AND BEFORE APRIL.

1	FILL, PLUG, AND COVER EXISTING CULVERT TO ABANDON IN PLACE PER DETAIL 3 ON THIS DRAWING
2	BACKFILL EXISTING CHANNEL ADJACENT TO BUILDING FOUNDATION
3	LOW SYMBOLIC FENCING (LOGS)



SCARIFY ALL DISTURBED AREAS TO A DEPTH OF 3 INCHES. ENSURE THAT THE TOP 3 INCHES OF SOIL IS LOOSE AND FRIABLE WITH NO CLOUDS LARGER THAN 1 INCH IN DIAMETER.

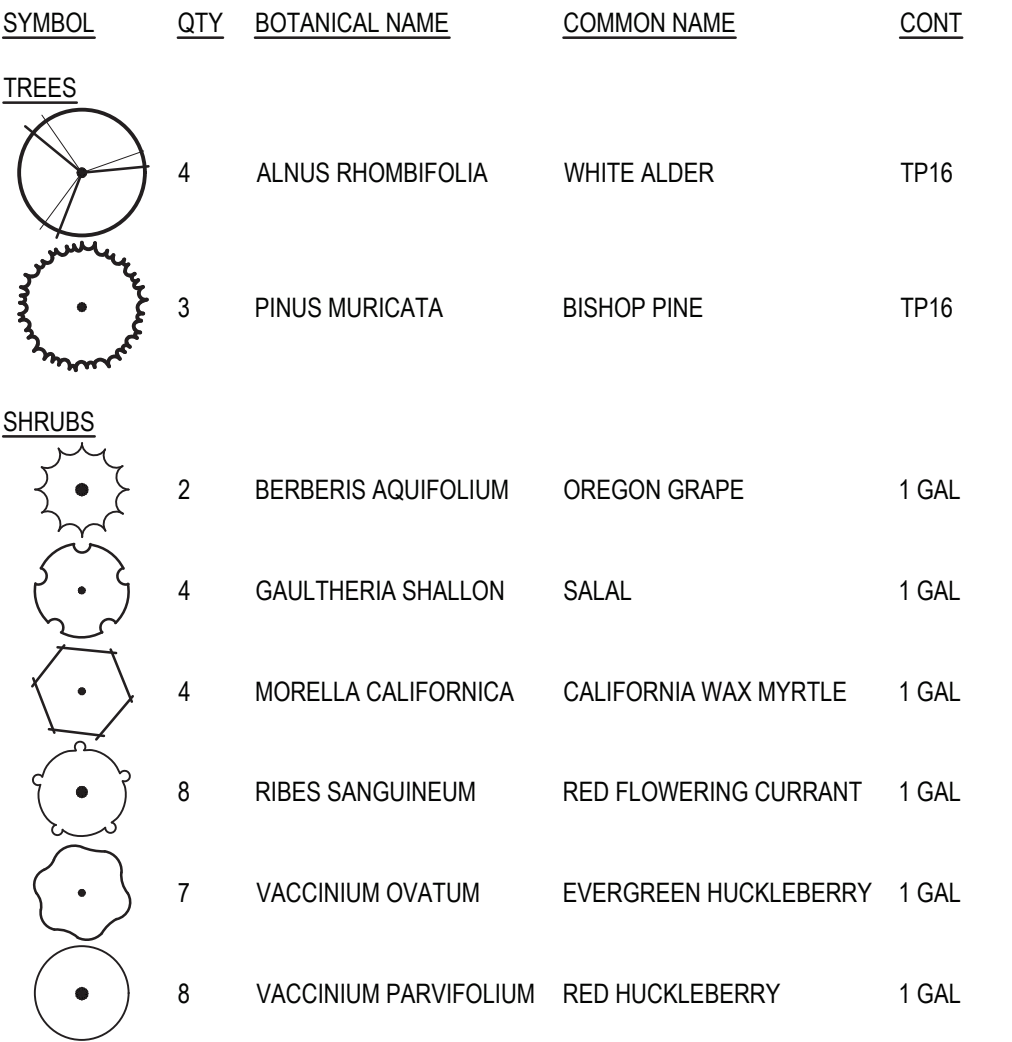
NEXT, APPLY A 2 INCH LAYER OF ORGANIC WEEF FREE COMPOST ACROSS THE UPLAND AREA, DRAINAGE CHANNEL SLOPE, AND DRAINAGE CHANNEL BOTTOM AND INCORPORATE THE COMPOST INTO THE TOP 3 INCHES OF THE SOIL. ONCE FULLY INCORPORATED, THE SOIL SHALL BE COMPACTED TO APPROXIMATELY 85% RELATIVE COMPACTION. FINISH GRADES ARE SHOWN ON PLANS AS CONTOUR ELEVATIONS AND SHALL BE MET FOLLOWING INCORPORATION OF COMPOST AND COMPACTION. SEEDING TO FOLLOW.

FOLLOWING SOIL PREPARATION, SEED AND MULCH ACCORDING TO THE FOLLOWING SEQUENCE:

- BROADCAST SEED IN ALL DISTURBED AREAS AT THE LOCATIONS AND RATES SHOWN ON THIS DRAWING. IN ADDITION TO THE SEED MIX, THE CONTRACTOR SHALL MIX IN MYCORRHIZAL INOCULUM AT A RATE OF 15 LBS PER ACRE.
- FOLLOWING SEEDING, HYDRO-MULCH (OR SIMILAR) THE ENTIRE SEEDED AREA. HYDRO SLURRY SHALL CONTAIN THE FOLLOWING COMPONENTS AND MINIMUM RATES:
- 2.1. COMMERCIALY AVAILABLE WEED FREE HYDRO-WOOD FIBER MULCH AT A RATE OF 2,000 LBS / ACRE.
 - 2.2. GREEN DYED CELLULOSE FIBER MULCH AT A RATE OF 500 LBS/ACRE (UNLESS INCLUDED IN WOOD FIBER MULCH)
 - 2.3. ORGANIC TACKIFIER AT 125 LBS/ACRE
 - 2.4. CLEAN WATER (TO CREATE AN ADEQUATE SLURRY FOR HYDRAULIC APPLICATION)
- INSTALL BIODEGRADABLE EROSION CONTROL BLANKET ON BOTTOM AND SIDE SLOPES OF DRAINAGE CHANNEL PER CALIFORNIA STORMWATER QUALITY ASSOCIATION BEST MANAGEMENT PRACTICE GUIDELINES.
- 3.1. BIODEGRADABLE EROSION CONTROL BLANKET SHALL BE 30% COCONUT / 70% STRAW MATRIX COMPOSED OF A BIODEGRADABLE TOP AND BOTTOM NETTING. THE BLANKET SHALL BE MIN. 0.30 INCHES IN THICKNESS, A SHEAR STRESS MAX PSI OF 1.75, A MINIMUM TENSILE STRENGTH OF 75 PSI AND FUNCTIONAL LONGEVITY OF TWELVE MONTHS.
- PLANT PLUGS AT THE BOTTOM OF CHANNEL. SEE SCHEDULE ON THIS SHEET FOR SPACING REQUIREMENTS.

BOTANICAL NAME / COMMON NAME	BROADCAST RATES (#LBS. PLS/ACRE)	SEED REQUIRED (#LBS. PLS/ACRE)
ACHILLEA MILLEFOLIUM / COMMON YARROW	1.00	0.10
BROMUS CARINATUS / CALIFORNIA BROME	3.00	0.50
ELYMUS GLAUCUS / BLUE WILDRYE	5.00	0.40
FESTUCA RUBRA / RED FESCUE	1.00	0.10
HORDUM BRACHYANTHERUM SSP. CALIFORNICUM / MEADOW BARLEY	5.00	0.40
IRIS DOUGLASIANA / DOUGLAS IRIS	7.00	0.80
LEYMUS TRITICOIDES / CREEPING WILD RYE	1.00	0.10
OXALIS OREGANA / REDWOOD SORREL	2.00	0.20
SISYRINCHIUM BELLUM / BLUE-EYED GRASS	2.00	0.20
STIPA PULCHRA / PURPLE NEEDLEGRASS	3.00	0.40
TOTAL	35.00	4.20

BOTANICAL NAME / COMMON NAME	BROADCAST RATES (#LBS. PLS/ACRE)	SEED REQUIRED (#LBS. PLS/ACRE)
CAREX OBNUPTA / SLOUGH SEDGE	1.00	0.05
ELEOCHARIS MACROSTACHYA / COMMON SPIKERUSH	6.00	0.25
JUNCUS PATENS / CALIFORNIA GRAY RUSH	5.00	0.20
SCHOENOPLECTUS AMERICANUS / THREE-SQUARE BULRUSH	2.00	0.10
SCIRPUS MICROCARPUS / SMALL-FRUITED BULRUSH	1.00	0.05
TOTAL	15.00	0.65



BOTANICAL NAME / COMMON NAME	SPACING	# PLUGS REQUIRED
CAREX OBNUPTA / SLOUGH SEDGE	24" O.C.	115
	TOTAL	115

[illegible]



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