Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5
Pursuant to 24 CFR Part 58.35(a)

Project Information

Project Name: 22711 Henderson Road - Property Acquisition for Future Housing Development.

Responsible Entity: Round Valley Indian Tribes (RVIT)

Grant Recipient: Round Valley Indian Housing Authority (RVIHA)

State/Local Identifier:

Preparer: Warren Mitchell

Certifying Officer Name and Title: James Russ, President, Round Valley Tribal Council.


Direct Comments to: Lewis W. Whipple, Executive Director.
Round Valley Indian Housing Authority
115 Concow Blvd. Suite B
Covelo, CA 95428
(707) 983-6188 Ext. 25
lwwipple@rviha.org
Project Location:
Project 2020. Item - Property Acquisition for Future Housing Development.

The Round Valley Indian Housing Authority (RVIHA) is seeking to purchase a 10.4 acre property, located at 22711 Henderson Road, Covelo, CA, for future housing development. The property is ideally situated for future housing development due to its location adjacent to the northwest corner of existing housing managed by the RVIHA. The property is located near the southern edge of the historic boundary of the Round Valley Indian Reservation (RVIR), in rural northern Mendocino County (see Figure 1). The RVIR is situated in the headwaters of the Eel River watershed with the Main Stem Eel River comprising the west reservation boundary, the North Fork Eel River to the north and the Middle Fork Eel River to the east nestled among the hills and mountains of the California Coastal Range. The rural community of Covelo is accessible by Highway 162, the only year round, paved vehicle access road.

Coordinates for the center of the property are 39.801636 degrees north, -123.273052 degrees west and the legal description is T22N, R13W, Section 2 of the USGS 7.5 minute Covelo West, CA topographic map. The land is zoned for rural residential use.

Figure 1. General Vicinity of the Round Valley Indian Reservation.
Description of Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
The property’s location is situated directly adjacent to the northwest corner of existing RVIHA properties making it ideal for acquisition and future housing development for tribal members (See Figures 2 & 3). The property proposed for purchase is rectangular in shape, approximately 10.43 acres in size and is designated as Assessor’s Parcel Number (APN) 033-340-02-00 with an appraised price of $488,000 (as of 08/03/2020) See Attachment 1). The property will be used by the RVIHA to develop approximately 20 housing units (exact number and configuration still under consideration) and all associated infrastructure features (streets, sidewalks, curbs, gutters, street lights, electrical, water, waste water connections and so on) as part of the of RVIHA’s ongoing housing development efforts.

Funding for the project will come from Indian Housing Block Grant (IHBG) # 55IH0608630 in the amount of $475,000 to purchase the land, $5,255,000 for housing construction and $4,000,000 for infrastructure/development from future IHBG/ICDBG Grants that will be sought by the RVIHA.

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Figure 2. Project Area Map. See upper left corner.
**Statement of Purpose and Need for the Proposal** [40 CFR 1508.9(b)]:
The RVIHA is the tribal entity responsible for overseeing all tribal housing matters with the goal of providing safe, decent, sanitary, and affordable housing to tribal members and their families. The rural setting of the reservation and the limited economic opportunities associated with the area severely limit the availability of decent and affordable housing. The purpose of this project is to facilitate RVIHA’s mission to provide housing opportunities for tribal members on Trust lands designated for housing and community development purposes.

**Existing Conditions and Trends** [24 CFR 58.40(a)]:
The project site is located in an unincorporated location in Mendocino County, California. The project area is approximately 10.4 acres and is located adjacent to existing RVIHA properties, access roads and utility infrastructure. The project area is located at the base of the foothills on the west side of Round Valley. The foothills west of the property are comprised of mixed conifer and oak woodland forests and open grasslands. The habitat to the north, east and south of the project site is the valley floor which is a comprised of rural residential home sites, the town of Covelo and various ranching / agricultural land uses.

**Funding Information**

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>Program</th>
<th>Funding Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>55IH0608630</td>
<td>IHBG</td>
<td>$475,000 – Land</td>
</tr>
<tr>
<td>TBD</td>
<td>IHBG/ICDBG</td>
<td>$5,525,000 - Construction</td>
</tr>
<tr>
<td>TBD</td>
<td>IHBG/ICDBG</td>
<td>$4,000,000 – Infrastructure/Development</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>$ 10,000,000</strong></td>
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</tbody>
</table>

**Estimated Total HUD Funded Amount:** ($10,000,000)

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]: ($10,000,000)
Figure 3. Photos of Project Site

Photo 1. Project site, looking northeast.

Photo 2. Project site, looking northwest.
Photo 3. Project site, looking southwest

Photo 4. Project site, looking southeast.
Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.6</strong></td>
<td></td>
<td></td>
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<tr>
<td><strong>Airport Hazards</strong></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>24 CFR Part 51 Subpart D</td>
<td>☑</td>
<td></td>
</tr>
<tr>
<td><strong>Coastal Barrier Resources</strong></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</td>
<td>☑</td>
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<tr>
<td><strong>Flood Insurance</strong></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</td>
<td>☑</td>
<td></td>
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</tbody>
</table>
### STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

<table>
<thead>
<tr>
<th>Clean Air</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</td>
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</table>

The project site is located within the Mendocino County Air Quality Management District (MCAQMD) which is one of three air districts that comprise the North Coast Air Basin. According to the U.S. EPA, Mendocino County is currently listed as being in “attainment” or is “unclassified” for all Federal health protective standards for air pollution (ambient air quality standards) for Counties designated as “Nonattainment” (see Attachment 6).

Since the MCAQMD has not adopted significance thresholds or screening criteria, there are no thresholds/criteria for criteria air pollutants applicable to the proposed action. However, for the purpose of assessing air quality impacts in environmental documents, the MCAQMD recommends the use of thresholds/criteria adopted by other air districts in the State.

The nearest Air Quality Management District with suitable guidelines is the Bay Area Air Quality Management District (BAAQMD) (See Attachment 7) which has developed screening criteria to provide lead agencies, and project applicants, with a conservative indication of whether a project could result in potentially significant air quality impacts. If the proposed project meets all of the screening criteria, then a detailed air quality assessment of their project’s air pollutant emissions would not be required. (Attachment 7, pg. 3-1).

The applicant proposes development of single story, single family dwellings, which is classified as a “Single family” according to the BAAQMD CEQA Guidelines. Table 3-1 below contains the construction and operational-related screening levels sizes for that classification (see Attachment 7, pg. 3-2).
This EA is for the purchase of the land, therefore there will be no impacts to Air quality. However, the land is being purchased for future home development of “Single family” dwelling units, therefore those activities fall below the screening criteria developed by the BAAQMD, and utilized by the MCAQMD, for construction and operational emissions, a detailed air quality assessment would not be required for the proposed project.

Construction activities, particularly during site preparation and grading, will likely generate fugitive dust in the form of PM$_{10}$ and PM$_{2.5}$. These fugitive dust emissions have the potential to impact nearby sensitive receptors (e.g., residents).

To reduce fugitive dust generation during excavation or earthmoving construction activities, the project would be developed in conformance with standard dust control measures during construction, which have been included as mitigation for the project.

According to the National Oceanic and Atmospheric Administration (NOAA) Office for Coastal Management, California’s coastal zone generally extends 1,000 yards inland from the mean high tide line. The project is located approximately 30 miles inland and east of the Coast Range from the Pacific Ocean.

Information available on the Department of Toxic Substances Control Envirostor Database and the State Water Resources Control Board GeoTracker websites both...
indicated that there are no known hazardous waste sites located near the proposed development and the project site is not located on or within one mile of an NPL (“Superfund”) site or within 1,000 feet of a CERCLIS site (see Attachments 8 & 9, respectively).

<table>
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<tr>
<th>Endangered Species</th>
<th>Yes</th>
<th>No</th>
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<tr>
<td>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</td>
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The project site is located within the Round Valley Indian Housing Community and is immediately surrounded by the Tribal Housing project area and other rural developments, schools, business and the town of Covelo.

To the west of the project site are the foothills of the Coastal Range. Habitat is a mixture of open grassland/oak woodland and conifers. To the south is Town Creek, a seasonal stream that once supported runs of salmon, steelhead and lamprey, but these species have not been sighted within the system for several years. (pers. comm. with T. Bettega, Tribes Natural Resources Dept. Manager.

A query of the US Fish and Wildlife Service Information Planning and Consultation (IPaC) was conducted to determine special status species that have potential to occur within the project area and its surrounding eight USGS 7.5 minute topographic maps (See Attachment 10).

A careful review and consideration of each species identified in the USFWS IPaC query with regard for the presence of habitat and for each species to exist at the site area and the projects ability to have an effect on each species determined the following:

**Northern Spotted Owl-Threatened.** This species relies on old conifer growth forests. The project area lacks trees and offers no habitat, therefore this project will have **No Effect** on the Northern Spotted Owl.
### Western Snowy Plover - Threatened

This species nests in sand dunes and beach sand along the Pacific Coast, and occasionally river gravel bars. The Pacific Coast is ~30 miles to the west, the gravel bar associated with Town Creek is located ~2800 feet south of the project. No Western Snowy Plovers have ever been observed on Town Creek (or in the Valley) therefore this project will have **No Effect** on the Western Snowy Plover.

### Yellow-Billed Cuckoo - Threatened

This species requires dense stands of hardwoods or brush associated with river systems. The project site contains no riparian habitat, nor does Town Creek located approximately 2800 feet south. This project will have **No Effect** on the Yellow-billed Cuckoo.

### California Red-legged Frog – Threatened

This species requires a variety of habitat elements with aquatic breeding areas embedded within a matrix of riparian and upland dispersal habitats. The project site and area lack aquatic breeding habitats (pools, backwaters, ponds, marshes, etc.) therefore the project will have **No Effect** on the California Red-legged Frog.

### Burkes Goldfields – Endangered

This species is limited to vernal pools and other seasonal wetlands. The habitat associated with project area does not contain this habitat element, therefore this project will have **No Effect** on Burkes Goldfields.

### Contra Costa Goldfields – Endangered

This species is also limited to vernal pools. The habitat associated with project area lacks this habitat element, therefore this project will have **No Effect** on Contra Costa Goldfields.

### Showy Indian Clover – Endangered

This species utilizes low, wet swales and grassy hillsides, however range of this species is typically found in Counties south of Mendocino County. The project area does
<table>
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<tr>
<th>Explosive and Flammable Hazards</th>
<th>Yes</th>
<th>No</th>
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<tr>
<td>24 CFR Part 51 Subpart C</td>
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The proposed residential development does not involve explosive or flammable materials or operations. The area surrounding the property consists primarily of residential housing.

Two small quantity commercial fueling stations (Redwood Market and Hidden Oaks Fuel Stop, EPA Handler ID # CAL00282006 & CAP000284729 respectively) are located more than a mile to the east and southeast of the project site which store and handle hazardous and flammable fuels (gasoline, diesel, kerosene and propane). The Covelo Airport also maintains a single fueling tank ~4,900 feet south of the project site (Attachment 11).

These materials are stored in above ground storage tanks. According to the HUD Acceptable Separation Distance (ASD) Guidebook (Attachment 12), if the materials are stored above ground in unpressurized containers, calculations for the ASD for thermal radiation (fire) only if the substance is of a hazardous nature (see Attachment 12 Pg. 32). The project site is more than 1 mile from the two commercial gas stations and 0.9 mile from the airport tank, well beyond the minimum ASD.

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<tr>
<th>Farmlands Protection</th>
<th>Yes</th>
<th>No</th>
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<tr>
<td>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</td>
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The subject property will be transferred into federal Trust status for the purpose of housing and infrastructure development for the Round Valley Indian Tribes, therefore the land will not subject to the Farmland Protection Policy Act of 1981.

Additional resources were also reviewed, [www.conserv.ca.gov/dlrp/fmmp/pages/index.aspx](http://www.conserv.ca.gov/dlrp/fmmp/pages/index.aspx), for the Tribal Winds Housing Develop Project, as well as the California Department of Conservation, Farmland Mapping and Monitoring Program.
### Floodplain Management

Executive Order 11988, particularly section 2(a); 24 CFR Part 55

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Based on the 2017 Flood Insurance Rate Map (See Attachment 5), the project site is located in Zone D, designated by the Federal Emergency Management Agency (FEMA). Zone D designation is used for areas where flooding is possible, but undetermined flood hazards, as no analysis of flood hazards have been conducted.

### Historic Preservation

National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800

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A State Certified Archeologist, Bill Cull, conducted an Archeological Survey for the project area in October 2020 and found “no evidence of archeological site P-23-002929 [CA-MEN-536] within the southern boundary of the Henderson property” The Report was also submitted to the Round Valley Indian Reservation Tribal Historic Preservation Officer (THPO) which also determined that no historic properties would be affected.

The current project and compliance with Section 106 of the NHPA, the negative survey leads to a determination of “No Historic Properties Affected” (see Attachment 13).

Due to the potential to discover unknown cultural and historic resources and human remain during project construction, inadvertent discovery, protocols have been included as mitigation for the proposed action. Implementation of these mitigation measures will ensure that unanticipated cultural and historic resources and human remains will be protected and that the project has no adverse effect on these resources.

### Noise Abatement and Control

Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B

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The purchase of the Henderson property by the RVIHA will not result in any significant noise production. When housing development activities commence, the U.S. Department of Housing and Urban Development (HUD) environmental noise regulations are set forth in 24CFR Part 51B (Code of Federal Regulations) and will be followed. The following exterior noise standards for new housing construction are applicable to the proposed action:
• 65 dBA day night average noise level (DNL) or less – acceptable.

• Exceeding 65 dBA DNL but not exceeding 75 dBA DNL – normally unacceptable (appropriate sound attenuation measures must provide an additional 5 decibels of attenuation over that typically provided by standard construction in the 65 dBA DNL to 70 dBA DNL zone; 10 decibels additional attenuation in the 70 dBA DNL to 75 dBA DNL zone).

• Exceeding 75 dBA DNL – unacceptable.

The project site is in a small, rural community and local traffic is the most common source of vehicle traffic. State Highway 162 is located approximately more than a mile east of the project site, but is primarily local traffic that connects Highway 101 to Covelo and outlying rural residences and access to the Mendocino National Forest. Paved road conditions termite beyond RVIT boundaries and are often closed due to winter snows.

Previous sound readings for a Tribal Winds Development project approximately 0.2 miles to the east performed by Tribal during earlier phases of the Tribal Winds Project development) found that noise levels were at or below 60 decibels (dB) for that adjacent project area.

Construction related noise impacts on adjacent residents may have an impact, especially those within 100 feet of the construction site. To reduce the potential noise impacts from construction, mitigation has been included limiting the hours and days of construction activity to daylight hours and weekdays.

The proposed single and/or multi-family residential project is not expected to generate significant noise levels that would be noticeable above the existing noise environment in the project area.
| Sol Source Aquifers | | | According to the U.S. EPA, the project site is not located on, nor does it affect a sole source aquifer. The nearest sole source aquifer is the Santa Margarita Aquifer, located approximately 189 miles south, near Santa Cruz, California. |
|---|---|---|
| Wetlands Protection | | Yes No | According to the USFWS National Wetland Inventory (NWI), a Freshwater Emergent Wetland exists approximately 0.32 miles north northeast from the northeastern corner of the property (see Attachment 15). The proposed purchase and subsequent housing development will have **no effect** on the wetland. |
| Wild and Scenic Rivers | | Yes No | The Eel River contains several reaches that are federally designated as Wild and Scenic River. However, the project site is located on the western side of Covelo, (see Attachment 16) approximately 6.5 miles to the west from the Main Stem Eel, the North Fork Eel is 10.5 miles to the north and the Middle Fork Eel is 6.5 miles to the south and are separated by hills of the California Coastal Range. This project will not encroach upon, or otherwise impact any reaches that are designated as Wild and Scenic. [https://rivers.gov/california](https://rivers.gov/california). |
| Environmental Justice | | Yes No | The project property will be placed into federal Tribal Trust status for the purposes of developing residential, commercial, and community facility activities that are supported by the Round Valley Indian Housing Authority. Mendocino County recognizes this status and has designated the property, including the project site, as “Tribal” lands in their General Plan. |
The U.S. EPA EJSCREEN Report (see Attachment 17) indicates the project site is in an area (3-mile radius of project site) with a density of 81 people per square mile, 59% minority population, and $21,996 per capita income.

According to the U.S. Census, the median household income in the nearby City of Willits in 2018 was $35,234 +/- 6,215. The median household income for Mendocino County in 2018 was $51,830 (data accessed via https://data.census.gov).

The project would locate affordable housing on tribal lands and adjacent to other recently constructed housing developments. As such, the proposed project would not result in disproportionately adverse environmental effects on minority or low-income populations.

### Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27]

Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate.

**All conditions, attenuation or mitigation measures have been clearly identified.**

**Impact Codes**: Use an impact code from the following list to make the determination of impact for each factor.

1. Minor beneficial impact
2. No impact anticipated
3. Minor Adverse Impact – May require mitigation
4. Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.
## Environmental Assessment Factor

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
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<tbody>
<tr>
<td><strong>LAND DEVELOPMENT</strong></td>
<td></td>
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</tr>
<tr>
<td>Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design</td>
<td>1</td>
<td>The proposed sale will remove the land from private ownership and place it into federal Tribal Trust status for the purposes of developing residential housing by the Round Valley Indian Housing Authority. Mendocino County has recognized other RVIHA properties used for housing development as Trust status the purchase and development of the Henderson property through the RVIHA will be consistent with these uses.</td>
</tr>
<tr>
<td>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</td>
<td>2</td>
<td>A comprehensive site specific soil survey has not been completed by the Natural Resources Conservation Service (NRCS) other than general published data and the data readily available from the USDA Web Soil Survey, which was accessed on 11/04/2020 (see Attachment 18). Soils at the site have been classified as Talmage with a Land Capability Classification of 4s. Class IV (4) soils have very severe limitations that restrict the choice of plants or require careful management practices. The soils in the area are suitable for commercial and residential development projects. No exceptions were noted during field reviews.</td>
</tr>
<tr>
<td>Hazards and Nuisances including Site Safety and Noise</td>
<td>2</td>
<td>As noted above in the section entitled “Contamination and Toxic Substances”, there are no known hazardous waste sites located near the proposed project development site, (see Attachments 8 and 9). No natural hazards exist near the site. The project will not significantly increase noise in the surrounding community or be affected by offsite noise. The development of this project is not impacted by noise from other developments such as railroads, airports, urban freeways or industrial developments. Previous sound readings found that noise levels were at or below 60 decibels (dB) for the project area, which complies with HUD noise standards. Any construction related noise impacts on adjacent residents that may occur will be of a temporary and minimal impact, and will be mitigated through limitations on the hours and days of construction activity.</td>
</tr>
<tr>
<td>Environmental Assessment Factor</td>
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<tr>
<td><strong>SOCIOECONOMIC</strong></td>
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<tr>
<td>Employment and Income Patterns</td>
<td>1</td>
<td>Based on personal communication with Round Valley Indian Housing Authority personnel and information gleaned during the development of this document, this project will not have any negative effect on income patterns, and may have a positive effect through local employment for development and long-term maintenance of the project.</td>
</tr>
<tr>
<td>Demographic Character Changes, Displacement</td>
<td>1</td>
<td>None are anticipated. The project will serve local community residents. Project development may result in retaining local population through expansion of housing services facilitated by the Round Valley Indian Housing Authority.</td>
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<tr>
<th>Environmental Assessment Factor</th>
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<th>Impact Evaluation</th>
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<tr>
<td><strong>COMMUNITY FACILITIES AND SERVICES</strong></td>
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| Educational and Cultural Facilities             | 1           | The Round Valley Indian Housing Authority developed the Building Horizons Youth Community Center near the project site as part of the previous development of the nearby Tribal Winds Housing project.  
  
Covelo offers public K-12 schools near the project site as part of the Mendocino County office of Education system. Other Charter school options are also available in the vicinity. Tribal members are currently enrolled in the public schools and there is not expected to be an impact to the schools from the proposed residential development.  
  
Additionally, the Federal Government provides financial support to local educational agencies under the Impact Aid program that provides basic support payments for “federally connected children” who live on properties that are exempt from local and state tax payments (such as Tribal Trust lands). Refer to the Elementary and Secondary Education Act of 1965, as Amended. |
The Tribe offers diverse social and educational programs for tribal members consisting of child-care and after school programs; Elder/Adult/Child clothing assistance; emergency food assistance; utility assistance programs, and a variety of other health, education and social programs.

<table>
<thead>
<tr>
<th>Commercial Facilities</th>
<th>1</th>
<th>Some services are found near the project site at the Hidden Oaks Casino, Hidden Oaks gas station and mini-mart, Hidden Oaks Campground and the Hidden Oaks Hotel. Other commercial services are located in Willits (39 miles), Laytonville (35 miles) or Ukiah (60 miles).</th>
</tr>
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<tbody>
<tr>
<td>Health Care and Social Services</td>
<td>1</td>
<td>The Indian Health Service has established a medical/dental and physical therapy clinic in Covelo (Round Valley Indian Medical Center). Local hospitals are located in Willits (Howard Memorial) and Ukiah (Adventist Health Hospital), California. Other private health related services are provided in Laytonville and Willits. The Round Valley Indian Tribes has developed onsite health and wellness programs for tribal members at various offices within the valley. Social services are provided by the United Indian Health Services. Additional social services are provided by Mendocino County Health and Human Services in Eureka. Tribal programs include Elder/Adult/Child clothing assistance, emergency food assistance, utility assistance and a range of other social services for Tribal members. Due to the size of the anticipated development of approximately 20 residential units, it is anticipated that existing health care and social services in the community will be adequate to serve the future residents.</td>
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<tr>
<td>Solid Waste Disposal / Recycling</td>
<td>1</td>
<td>Service is provided by local contract solid waste haulers (Solid Waste of Willits) that transport waste to permitted off-site solid waste facilities. Due to the size of the proposed residential development, the proposed action will not significantly increase solid waste generation in the area. The project may be beneficial by providing Waste disposal services to residents that may not currently have such service available.</td>
</tr>
<tr>
<td>Waste Water / Sanitary Sewers</td>
<td>1</td>
<td>Wastewater treatment facilities have been developed by the Round Valley Indian Tribes and existing infrastructure exists for connection near the property. As populations within Round Valley continue to grow and expand, the need</td>
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for expansion of the existing wastewater treatment facility is being planned to increase its capabilities to accommodate Covelo’s growing population needs. The future housing development may be beneficial to those that may not currently have sewer service. Operation and management of the system will be the responsibility of the Tribe (Reviewed 10/10/20).

<table>
<thead>
<tr>
<th>Water Supply</th>
<th>1</th>
<th>Potable water facilities have been established by the Round Valley Indian Tribes – Water Department and are sized and capable to accommodate the current residential and commercial needs. However, as Covelo’s population continues to grow expansion to the water treatment facilities will be required. The future housing development may be beneficial by providing a safe potable water supply to residents that may not currently have such service. Operation and management of the system will be the responsibility of the Tribe (Reviewed 10/20/20).</th>
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| Public Safety - Police, Fire and Emergency Medical | 1 | Police services are primarily provided by the Round Valley Tribal Police Department with additional law enforcement support resources available by the Mendocino County Sheriff Department, the California Highway Patrol and California Department of Fish and Wildlife, reviewed 12/2020).

Emergency services are available at Howard Hospital in Willits and Adventist Health Hospital in Ukiah, California approximately 60 and 90 minutes (respectively, from the project site.

Fire protection services are provided locally by the Covelo Volunteer Fire Department and the California Department of Forestry and Fire Protection (CALFIRE) as the County Fire agency, with mutual-aid support from adjacent public fire agencies.

Emergency ambulance services are provided by City Ambulance of Eureka and emergency medical services are provided by Howard Memorial Hospital in Willits or Adventist Health Hospital in Ukiah, California. Air ambulance service is available through Reach.

Due to the size of the proposed development (~ 20 residential units), it is anticipated that existing public safety services in the community will be adequate to serve the future residents. |
Open space is abundant in the surrounding area. Covelo is uniquely situated between 3 forks of the Eel River (Main Stem Eel to the West, North Fork Eel to the north and South Fork Eel to the South) and the Mendocino National Forest to the East, thus numerous outdoor recreational opportunities abound. The Round Valley Indian Tribes maintain Reservation lands and open space areas for residents (Site reviewed, 11/2020).

Significant outdoor recreation opportunities exist in the area, and the project will not impact these. A community center (Building Horizons) has been developed near the project site for Tribal. (Site reviewed, 11/2020).

Existing access roads were designed with sufficient capacity to serve the proposed development expansion.

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
</table>
| Unique Natural Features, Water Resources | 1 | Unique Natural Features

The entire project area was studied for current conditions and environmental concerns through prior environmental reviews, and no unique natural features or prime farmlands or soils were found to exist on the site (Refer 2020 HUD EA, 2010 EA Supplement, 2017 Phase 4 EA).

These documents are available at the Round Valley Indian Housing Authority office and the Round Valley Tribal Administration office. As noted above, infrastructure for the future residential housing development (e.g., access driveway, parking lot, sidewalk, lighting, trash collection area, utilities, and landscaping) will be developed accordingly during the planning phase.

Water Resources

The proposed development will be served by the Tribe’s existing potable water and wastewater treatment systems. Currently, the Tribes water resources lack sufficient capacity, but will be expanded to meet growing demands.
Round Valley Indian Housing Authority
Property Acquisition
22711 Henderson Rd., Covelo, CA.

and accommodate the proposed housing development. Storm water facilities will be designed and installed at the project site to serve the proposed housing development.

Based on the Flood Insurance Rate Map (Attachment 5) the project site is located in Zone D. The Zone D designation is used for areas where there are possible but undetermined flood hazards, as no analysis of flood hazards has been conducted. As such, flood insurance is not required for the project.

The project site is not located within a Sole Source Aquifer area. According to the EPA Region 9 Sole Source Aquifers map, the nearest sole source aquifer is located approximately 188 miles south of the site known as the Santa Margarita Sole Source Aquifer near Santa Cruz, California south of the San Francisco Bay. EPA Sole Source Aquifer data for California Region 9.

<table>
<thead>
<tr>
<th>Vegetation, Wildlife</th>
<th>2</th>
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</table>
| Vegetation on the project site consists of native and non-native grasses and domestic landscaping. Review of historic documentation (Attachment 14) in 2020 found that no federal special status species or their habitats are located at the project site. A review of the 2020 US Fish and Wildlife Service IPaC species list was undertaken to determine if any threatened, endangered or sensitive species are reported from the vicinity of the project site or if critical habitat exists at the site for these species (Attachment 10). As indicated above, under the section entitled “Endangered Species”, no suitable habitat exists on the project site for the listed species that may occur in the area and the project will have no effect on any identified species.

The Tribe has a Natural Resources Department (NRD) to oversee their numerous land management activities, as a result of required surveys, the NRD is aware of the location of sensitive species within Tribal lands, pers. comm. w/ Toni Bettega, NRD Manager, confirms that there are no special status species or their habitats associated with the project site. Therefore, the project will have no impact on special-status plants or wildlife.

Other Factors | None

**Additional Studies Performed:**

Yes, RVIHA has been developing housing projects in the area for decades and numerous studies have been conducted accordingly and the Henderson property study area overlaps the study area...
associated with the Environmental Assessment for a housing development project at 212 Little Lake Way, Covelo CA 95428 which is located approximately .32 miles to the southeast of the Henderson Rd project area. SHN Consulting Engineers and Geologists is currently preparing (as of 11/11/20) an Environmental Assessment for a proposed Cell Tower Development project approximately 500 feet due east of Henderson property at 22875 Henderson Road, personal communication with Scott Perkins (SHN) has indicated that they have not encountered any problematic environmental (or other) issues in the development of their report. Another Environmental Assessment (EA) conducted on a piece of property near the current project area (76580 High School Street, Covelo, CA 95428, Mendocino County CA. for the development of Housing and Community Center (Grant Number 55IH0608630) in May of 2014. The results of that EA also had a Finding of No Significant Impact for the project site and surrounding area.

Field Inspection (Date and completed by):

- October 16, Bill Cull - Archeology/ Cultural Resources Survey
- October 16, 2020: RVIT – THPO Office Inspector
- November 6, 2020: W. Mitchell – Mitchell & Associates

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:
- AES Environmental, Phase I Environmental Site Assessment, Fearrien Property 2005
- Bay Area Air Quality Management District (BAAQMD), CEQA Guidelines, 2017
- Round Valley Indian Tribes, Natural Resources Departments, Toni Bettega, 2020
- Round Valley Indian Housing Authority, Lewis Whipple, Executive Director, Chris Britton - Project Manager & Deanna McCarty- Finance Manager, 2020
- Round Valley Indian Tribes, Tribal Historic Preservation Officer, Patricia Robano, 2020
- California Department of Toxic Substances Control, Envirostor Database, 2020
- California Department of Fish & Wildlife California Natural Diversity Database, 2020
- California Historical Resources Information System (CHRIS) 2020
- California State Water Resources Control Board, Geotracker Program, 2020
- County of Mendocino, General Plan, 2009
- Federal Emergency Management Administration, Flood Insurance Rate Map, 2017
- North Coast Unified Air Quality Management District, Website, 2020
- Mendocino County Office of Education, Website, 2020
- Mendocino County Regional Transportation Plan, 2008 (Amended 2013)
- National Wild and Scenic Rivers, Website, 2020
- Natural Resources Conservation Service, Web Soil Survey, 2020
- US Census Bureau, Quick Facts, 2020
- USDA Natural Resources Conservation Service, Web Soil Survey, 2020
- USEPA, Environmental Justice Mapper, 2020
- USEPA, Envirofacts Database, 2020
- USEPA, Superfund Database, 2020
- USEPA, Sole Source Aquifers, 2020
- USFWS, National Wetlands Inventory Mapping Database, 2020
- USFWS, Information for Planning and Consultation (IPaC), 2020
- USFWS, Coastal Barrier Resource System, 2020

**Attachments**

Attachment 1: Henderson Property Appraisal Report for 22711 Henderson Road, Covelo, CA. 95428.

Attachment 2: HUD - Indian Housing Block Grant (IHBG) Program, Letter of Commitment.

Attachment 3: Mendocino County. 2020. Mendocino County – Airport Compatibility Zones.


Attachment 10: USFWS - Information for Planning and Consultation resource list. Available at: https://ecos.fws.gov/ipac/ Updated on 12/01/20.


Attachment 14: Archeological Survey Report for RVIHA’s Henderson Road Project, Mendocino County, CA. NWIC File No.: 20-0814.


List of Permits Obtained:

The Round Valley Indian Housing Authority oversees all tribal housing matters, with the goal of providing safe, decent, sanitary, and affordable housing to tribal members and their families and

Public Outreach [24 CFR 50.23 & 58.43]:

The Round Valley Indian Tribe, as the Responsible Entity under NEPA, will comply with the following requirements for public outreach:

- Public noticing shall be published in an appropriate local printed news medium and sent to individuals and groups known to be interested in the proposed action, concerning the availability for review of the Environmental Assessment (EA) completed for the proposed project (24 CFR 50.23).

- Publishing of the Finding of No Significant Impact (FONSI) and observance of the corresponding comment periods (24 CFR 58.43).

Cumulative Impact Analysis [24 CFR 58.32]:

Consideration of the proposed purchase of the property at 22711 Henderson Road, Covelo, CA, and the future development of approximately 20 residential housing units and associated infrastructure development by the RVIHA, the following conclusions can be made: 1) This
project will not result in permanent, or cumulatively considerable adverse impacts to “waters of the United States, including wetlands” or existing flora or fauna land use patterns. 2) With implementation of Mitigation Measures and Conditions (described below) no cumulative impacts would occur to the other environmental considerations of air, water, noise or traffic as a result of the proposed project actions.

**Alternatives** [24 CFR 58.40(e); 40 CFR 1508.9]

**Alternative 1. Deferring Housing Development**
This alternative would defer purchase of property to a later date and delay development of housing until a future date at which time the number and type of housing may be modified. This alternative was eliminated from consideration because the property being evaluated under this EA will be purchased and placed into Trust status for the expressed purpose of housing development, and this project is a continuation of the Tribes site development plans.

Deferring housing development on the property (for which it was designated) would result in Tribal members who need housing having to live in other locations away from Tribal support services and potentially in substandard conditions. While the property could be held for development in the future, tribal members who need housing now would go without. Selection of this alternative would not meet the purpose of need of the project and was therefore not selected.

**No Action Alternative** [24 CFR 58.40(e)]:
The No Action alternative would not develop housing at the project site and would retain the property in its current semi-developed state (roads, a parking lot, and infrastructure are in-place). Selection of the No Action alternative would not develop the property for Tribal housing needs, and would not have any impacts on topography, geology, vegetation, wildlife, cultural resources, threatened or endangered species, infrastructure, traffic, public services, noise, visual resources or tribal culture. The lands would remain in a semi-developed state, where roads, water, sewer and other utilities, and other housing units have been developed, but the proposed apartment building would not be constructed.

Selection of the No Action alternative does not meet the goals of the Round Valley Indian Tribes to provide housing for its members, many who currently live in the Covelo area. Based on this evaluation, the No Action alternative was not selected.

**Summary of Findings and Conclusions:**
For air, noise and environmental concerns, the project of purchasing the property will have no effect on any of these resources and the goal of developing housing in the future will likely result in temporary and minor adverse impacts that can be minimized through the implementation of
appropriate mitigation measures. No negative impacts are anticipated that could be considered potentially significant to the extent that an Environmental Impact Statement would be required.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]
The purchase of the property will require no mitigation efforts, however the goal of developing housing for tribal members will likely result in temporary but minor adverse effects. The effects of propose housing development can be addressed, and minimized, by the following mitigation measures that shall be adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Air Quality
The following standard best management practices and conditions for controlling dust emissions during construction will be required as to reduce impacts from fugitive dust generation.

- All active construction areas (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered a minimum of two times per day during the dry season;
- Hydro seed, or apply non-toxic soil stabilizers to inactive construction areas;
- Dust-generating activities shall be limited during periods of high winds (over 15 mph);
- Suspend excavation and grading activity when winds exceed 25 mph.
- All haul trucks transporting soil, sand, or other loose material, likely to give rise to airborne dust, shall be covered;
- All vehicle speeds shall be limited to 15 miles per hour within the construction area;
- Promptly remove earth or other tracked out material from paved streets onto which earth, or other material has been transported by trucking or earth-moving equipment;
- Conduct digging, backfilling, and paving of utility trenches in such a manner as to minimize the creation of airborne dust;
- Pave the backfilled trenches as soon as practicable after backfilling of the trenches.

Historic Preservation
Due to the potential to discover unknown cultural and historic archaeological resources and human remains during site preparation and construction, the following mitigation is proposed to minimize potential impacts to cultural and historic resources

- In the event that unanticipated historic or archaeological resources are discovered at the project site during construction operations, all construction activities shall stop and the Tribal Historic Preservation Officer (THPO) shall be notified. Investigations and disposition of the historic or archaeological resources shall be in compliance Section 106 of the National Historic Preservation Act as amended and the Archaeological Resources Protection Act of 1979. Construction activities may resume after the THPO, or other designated official of the Round Valley Indian Tribes, determines that Federal laws and Tribal customs have been complied with.
• If human remains are found, or are suspected to be present at the project site, all work at the site shall cease and the Tribal Historic Preservation Officer (THPO) and the Mendocino County Coroner shall be notified. Treatment of human remains or suspected human remains shall follow the guidelines as set forth in the Native American Graves Protection and Repatriation Act, as appropriate. Work at the project site shall resume after authorization is provided by the appropriate representative of the Round Valley Indian Tribes.

**Noise Abatement**

To minimize noise generated during construction activity, the following noise minimization measures shall be implemented:

• Construction related noise may have an impact on adjacent residents within the Tribal Winds Housing development, especially those within 100 feet of construction activities to reduce the potential impacts from construction related noise, construction activities will be limited to daylight hours from 7:00 AM to 7:00 PM during weekday periods.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure</th>
</tr>
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<tbody>
<tr>
<td>Mendocino County Air Quality Management District (MCAQMD) Rule 1-400(a), 430(a) and 430(b).</td>
<td>These rules collectively prohibit the generation of fugitive dust emissions. All site preparation work, grading, or other construction activity that could create dust, must employ best management practices to minimize fugitive dust emissions. Standard dust control measures have been included as mitigation for the proposed action.</td>
</tr>
<tr>
<td>Section 106 of the National Historic Preservation Act (36 CFR 800)</td>
<td>Due to the potential for discovering cultural and historic resources and human remains during site preparation and construction activities, mitigation has been included requiring compliance with standard inadvertent discovery protocols.</td>
</tr>
<tr>
<td>Potential for adverse noise impacts to adjacent residents during construction activity</td>
<td>To minimize noise generated during construction activity, mitigation has been included requiring limitations on hours and days of construction activity.</td>
</tr>
</tbody>
</table>

**Determination:**

☑️ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]  
The project will not result in a significant impact on the quality of the human environment.
Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

Preparer Signature ____________________________ Date: 12/06/2020 .


Certifying Officer Signature: ____________________________ Date: ____________.

Name/Title: ____________________________

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).