



---

**PLANNING COMMISSION STAFF REPORT  
GENERAL PLAN AMENDMENT/REZONE**

---

**GP\_2018-0002/R\_2018-0004  
NOVEMBER 15, 2018**

---

**SUMMARY**

**OWNER:** MARY AGNES GOLDEN  
PO BOX 1658  
UKIAH, CALIFORNIA 95482

**APPLICANT:** YULUPA INVESTMENTS, LLC  
PO BOX 630  
UKIAH, CALIFORNIA 95482

**AGENT:** LACO/REBECCA DALSKE  
776 S STATE STREET  
UKIAH, CALIFORNIA 95482

**REQUEST:** General Plan Amendment and Rezoning to change 10.63± acres (APN 184-140-10) from Agricultural with Flood Plain and Airport Zone Combining District (AG40:FP[AZ]) to Industrial with Flood Plain and Airport Zone Combining District (I:FP[AZ]) for the General Plan designation and from Agricultural with Flood Plain and Airport Zone Combining District (AG-40:FP[AZ]) to Industrial with Flood Plain and Airport Zone Combining District (I-2:FP[AZ]) for zoning.

**LOCATION:** 3± miles south of Ukiah center, on the East side of Taylor Drive (CR 143), 0.2± miles south of its' intersection with Plant Road (CR 142). Located at 3201 Taylor Drive, Ukiah (APN 184-140-10).

**TOTAL ACREAGE:** 10.63 Acres

**GENERAL PLAN:** Agricultural- 40 acre minimum, Flood Plain and Airport Zone Combining Districts (**AG40:FP[AZ]**)

**ZONING:** Agricultural- 40 acre minimum, Flood Plain and Airport Combining Districts (**AG-40:FP[AZ]**)

**SUPERVISORIAL DISTRICT:** 1

**ENVIRONMENTAL DETERMINATION:** Negative Declaration

**RECOMMENDATION:** Approve with Conditions

**STAFF PLANNER:** Susan Summerford

**BACKGROUND**

**PROJECT DESCRIPTION:** General plan amendment and rezone to change 10.63± acres (APN 184-140-10) from Agricultural with Flood Plain and Airport Zone Combining District (AG40:FP[AZ] general plan, AG-40:FP[AZ] zoning) to Industrial (I:FP[AZ], general plan, I-2:FP[AZ] zoning). The request is intended to facilitate future industrial uses to be principally permitted, with the final desired development of the site to be a location for C & S Waste Solutions activities.

**SITE CHARACTERISTICS:** The site is located 3± miles south of Ukiah city center, on the eastern side of Taylor Drive (CR 143), 0.2± miles south of the Taylor Drive intersection with Plant Road (CR 142). The subject parcel is currently zoned Agricultural, with a Flood Plain Combining District and Flood Zone designation of AE. The site is located within the Ukiah Valley sanitation district, Willow Water District and is located both in the Airport Planning Area (Zone B2) and lies within the purview of the Ukiah Valley Area Plan (UVAP). As well, the site is located within the vicinity of the Federal Environmental Protection Agency Superfund site known as the Coast Wood Preserving Hazardous Waste Area of Influence. The site is currently vacant and it located adjacent to several other parcels owned and utilized by the applicant for solid waste activities.

The subject parcel is currently vacant, and was formerly in use as a pear orchard. The applicant has applied for and received a grading permit from Mendocino County for the purpose of raising the elevation of the parcel to be above the federally-designated Flood Zone “AE”, which typically limits or prohibits development; to a Flood Zone “X” designation, which allows for development and construction on a site above the Base Flood Elevation level.<sup>1</sup> Therefore, the request from the Applicant includes capturing the physical alteration of the site in the rezoning to re-classify the subject parcel as to no longer be in a Flood Plain Combining District. This re-designation is in concert with the requirements of Federal Emergency Management Agency with regards to mapping and flood insurance categories. Prior to the grading permit granted in July 2018 (BU\_2018-1073), the site had a vegetative cover primarily consisting of grasses, blackberry brambles, and weedy species. A row of existing mature cottonwood trees is located along the Site’s western boundary, which were preserved during grading. The post-grading site is relatively flat, with a gentle slope to the east. A vegetative V-ditch was installed, with vegetative swales along the eastern and southern portions of the site.

Access to the parcel from Taylor Drive is located through a gate on the northwestern corner. This shall remain the central access point until such time as the desired principally permitted industrial uses are allowed and the site is able to be connected to existing C & S waste access roads in order to consolidate activities. The surrounding land uses include additional industrial uses, Highway 101 on- and off-ramps to the west; industrial and residential uses to the north and south; City of Ukiah Public Facilities to the east; and the abandoned Northwest Pacific Railroad directly to the east of the site.

As mentioned, the subject parcel is located within Zone B2 of the Ukiah Municipal Airport. Review of this application by the Airport Land Use Commission was completed on October 18, 2018.

**SURROUNDING LAND USE AND ZONING:**

	ADJACENT GENERAL PLAN	ADJACENT ZONING	ADJACENT LOT SIZES	ADJACENT USES
<b>NORTH:</b>	Industrial	Industrial-2	4.05 acres	Industrial
<b>EAST:</b>	Agricultural:40	Agricultural	43 acres	Agricultural
<b>SOUTH:</b>	Industrial (2 parcels)	Industrial-1 (2 parcels)	2 acres/ 1.74 acres	Industrial
<b>WEST:</b>	Agricultural:40	Agricultural:40 (2 parcels)	2.08 acres/ unknown	Agricultural

**PUBLIC SERVICES:**

Access: Highway 101 to Plant Road (CR 142) to Taylor Drive (CR 143)  
Fire District: Ukiah Valley Fire District  
Water District: Willow Water District  
Sewer District: Ukiah Valley Sewer District  
School District: None

**AGENCY COMMENTS:** On August 8, 2018 project referrals were sent to all responsible or trustee agencies with jurisdiction over the Project. Their submitted recommended conditions of approval are contained in Exhibit A of the attached resolution. A summary of the submitted agency comments are listed below:

---

<sup>1</sup> FEMA Flood Map Zones website

AGENCY:	COMMENT:	AGENCY:	COMMENT:
MTA	No comment	DOT	Comments
RWQCB	No comment	Arch Commission	Comments
Caltrans	No comment	ALUC	Committee review
CalFire	No comment	Sonoma State U	Comments
Assessor	No comment	UVSD	No comment
Farm Advisor	No comment	MC Bldg Inspection	No comment
UUSD	No comment	MC Health Services	No comment
Dept of Conservation	No comment	CADFW	No comment
USFWD	No comment	Ag Commission	No comment
RRFC	No comment	AQMD	Comments
MCEH	No comment	Willow Water District	No comment
UVFD	No comment	Ukiah City Planning	No comment
Army Corps	No comment		

### **KEY ISSUES**

#### **1. General Plan and Zoning Consistency:**

**Goal DE-3 (Land Use):** “Industrial sites and uses (including resource-based industries) located and designed to minimize conflicts with surrounding land uses, minimize environmental degradation and risk from natural and man-made hazards, and protect natural resources.”

The applicant is an existing solid waste business that owns several parcels in the immediate vicinity of the subject site. As well, the site is surrounded to the north, south, and west by industrial land uses. A public water facility treatment center is to the east. Therefore, a rezoning to Industrial would be consistent with not only the surrounding land uses, but would also satisfy the General Plan Development Element goal of co-locating industrial uses. Environmental degradation would also be minimal, as the future intent of the applicant is to relocate and consolidate solid waste activities currently occurring on North State Street in Ukiah to the subject site should the rezoning request be granted.

**Policy DE-57 (Industrial Development Policies):** “Locate and design industrial sites and uses in a manner that protects natural resources and minimizes environmental degradation and risk from natural or manmade hazards.”

The proposal seeks to rezone the site in order to consolidate existing solid waste activities to one location. The site has been graded and primed for the relocation and would result in less vehicle traffic across town and distill the activities to one central spot. The vegetative swales and V-ditch installed as part of the grading employs Best Management Practices (BMPs) to manage and direct potential stormwater runoff from reaching the Russian River, indicating minimal environmental degradation as a result of the project.

**Policy DE-58 (Industrial Development Policies):** “Protect industrial areas and investments from future conflicts by designating surrounding lands for compatible uses and incorporating appropriate land use buffers.”

The subject site is bounded to the north and south by industrial uses. An abandoned railway line is to the east, with Highway 101 and Taylor Drive to the west. It can therefore be stated that the subject parcel is located within an industrial corridor that is an ideal site for the relocation of the C & S waste activities and would not conflict with surrounding land uses.

**Policy DE-120 (Infrastructure/Facilities and Services Policies):** “General Plan changes to increase density or intensity should not be granted when basic infrastructure deficiencies are identified unless there is a program in place for timely resolution of the problem.”

The applicant is requesting a rezoning and general plan amendment to allow future industrial uses of the parcel to be principally permitted. No known infrastructure deficiencies have been identified on site or in the vicinity. The planned future use has been vetted, and will connect to existing utilities available.



**Policy DE-190 (Water Supply and Sewer/Wastewater Treatment Services Policies):** "Development of residential, commercial, or industrial uses shall be supported by water supply and wastewater treatment systems adequate to serve the long-term needs of the intended density, intensity, and use."

While no structures are proposed as part of this request, the future planned development of the site will connect to existing water supply and wastewater treatment systems. No connectivity or availability issues have been identified as a result of the project being vetted by jurisdictional agencies. Additionally, future planned development will be designed as to connect to existing infrastructure at the adjacent C & S Waste sites.

## 2. Ukiah Valley Area Plan (UVAP) Consistency:

**Goal OC3.1b Agricultural Land Conversion Criteria:** "Proposals to convert Agricultural Lands to non-agricultural classification will be considered only after satisfying the following requirements:

- The project shall not result in a need for premature expansion of infrastructure in conflict with other Area Plan policies.
- The project shall not have a significant adverse effect on agricultural uses in the area.
- The project site is substantially unusable for agricultural purposes due to encroaching adjacent nonagricultural uses.
- The proposal must achieve the long-range goals of the General Plan and Area Plan for the area as it exists prior to the proposal."

The proposed project would be consistent with Policy OC3.1b of the UVAP for the following reasons:

1. No infrastructure would be required at Site since no development is currently proposed;
2. Agricultural areas and uses directly east of the Site would remain and would not be impacted by the anticipated future use of the Site;
3. Nonagricultural uses are encroaching upon the Site. The uses to the north and south are industrial in nature. The Site is located adjacent to additional properties owned and utilized by the Applicant for solid waste processing activities and other industrial uses. Agricultural uses are located east of the Site, and, as noted above, would not be impacted by the proposed project;
4. The proposed project would be consistent with the objectives, goals, and policies of both the County General Plan (as discussed above) and UVAP.

## 3. Environmental Determination:

Per the California Environmental Quality Act, an Initial Study was prepared by the applicant's agent, LACO and Associates. County staff has thoroughly reviewed and vetted the Initial Study, and has accepted the information contained therein. A Negative Declaration has been prepared for the proposed rezoning and General Plan Amendment.

## RECOMMENDATION

By resolution, the Planning Commission recommends that the Board of Supervisors adopt a Negative Declaration, approve the General Plan Land Use Amendment to change 10.63± acres (APN 184-140-10) from AG40:FP[AZ] (Agricultural, minimum parcel size 40 acres with Flood Plain and Airport Zone Combining Districts) to I:FP[AZ] (Industrial with Flood Plain and Airport Zone Combining Districts) and, by ordinance, Rezone 10.63± acres (APN 184-140-10) from AG-40:FP[AZ] (Agricultural, minimum parcel size 40 acres with Flood Plain and Airport Zone Combining District) to I-2:FP[AZ] (General Industrial with Flood Plain and Airport Zone Combining Districts ).

10/30/18  
DATE

  
SUSAN SUMMERFORD  
PLANNER III

**ATTACHMENTS:**

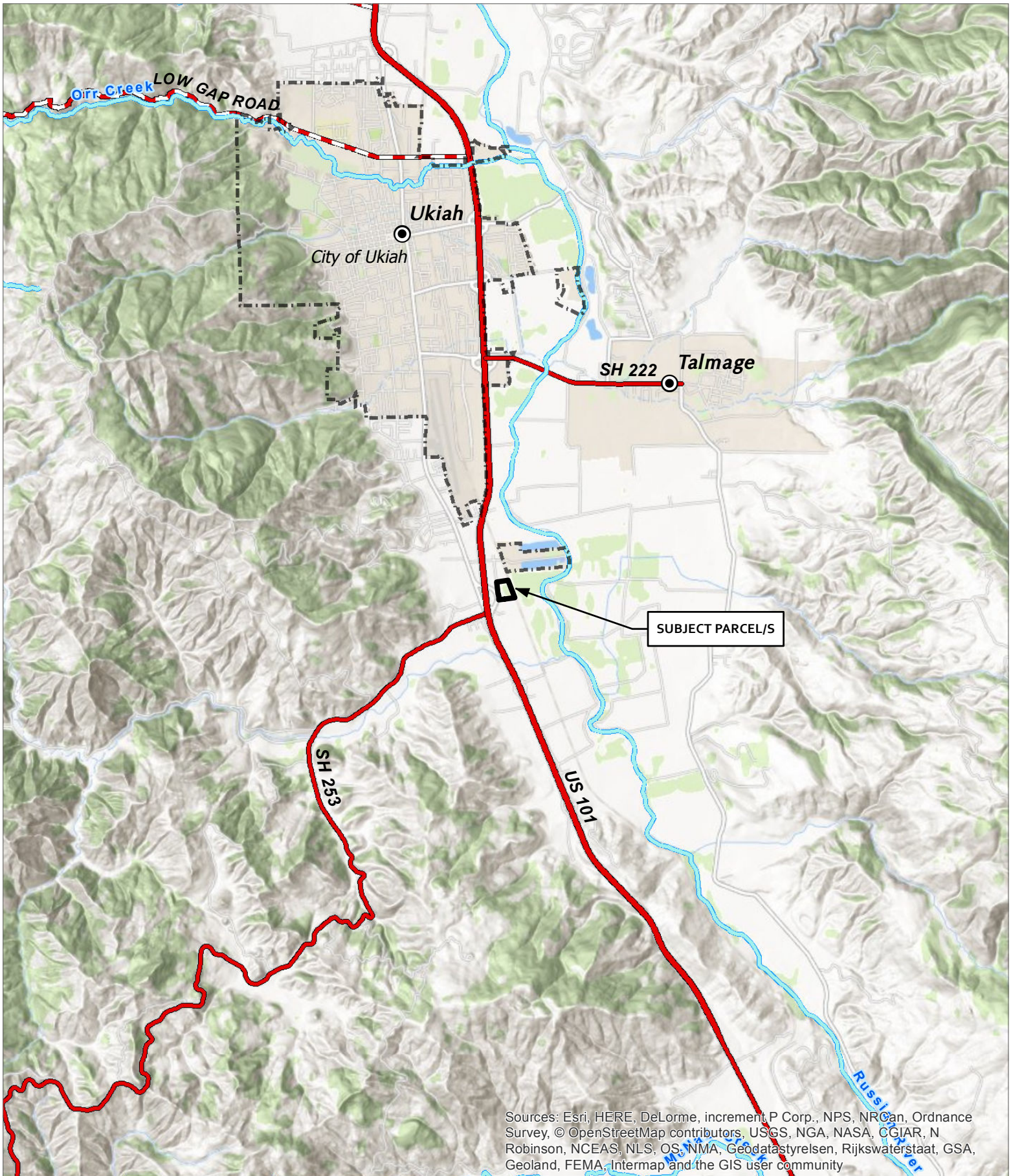
- A. Location Map
- B. Adjacent Owner Map
- C. Zoning Map
- D. General Plan Map
- E. Airport Zones Map
- F. General Plan Exhibit
- G. Rezone Exhibit

**RESOLUTION OF THE PLANNING COMMISSION:**

**NEGATIVE DECLARATION/Initial Study available online at:**

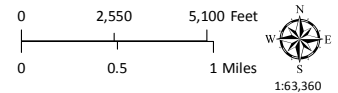
<https://www.mendocinocounty.org/government/planning-building-services/meeting-agendas/planning-commission>





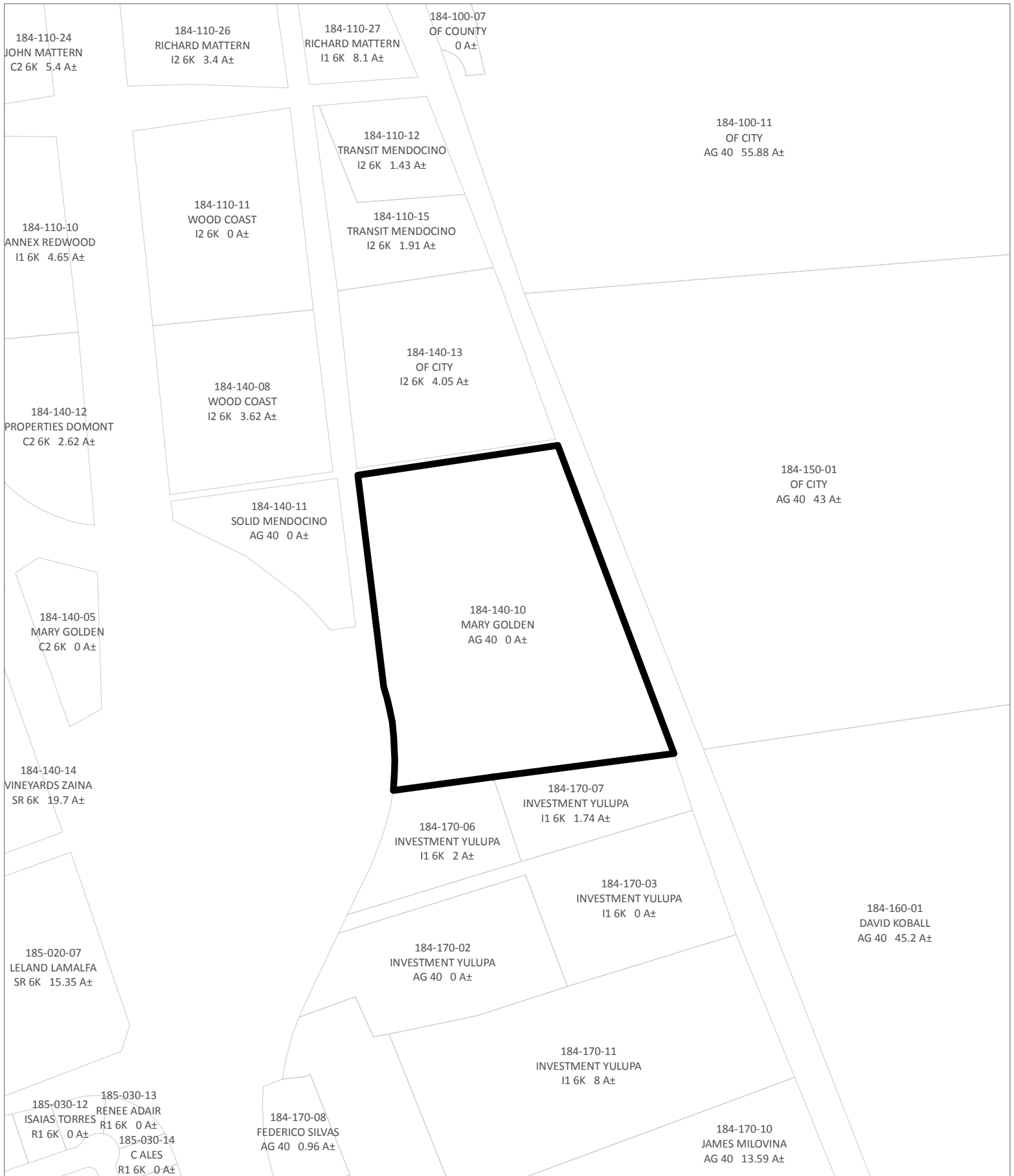
CASE: GP 2018-0002  
OWNER: GOLDEN, Mary ET AL  
APN: 184-140-10  
APLCT: Yulupa Investments, LLC  
AGENT: Rebecca Dalske  
ADDRESS: 3201 Taylor Drive, Ukiah

- Major Towns & Places
- City Limits
- Major Rivers
- Highways
- Major Roads

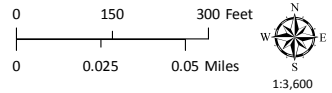


LOCATION MAP

THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.  
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES



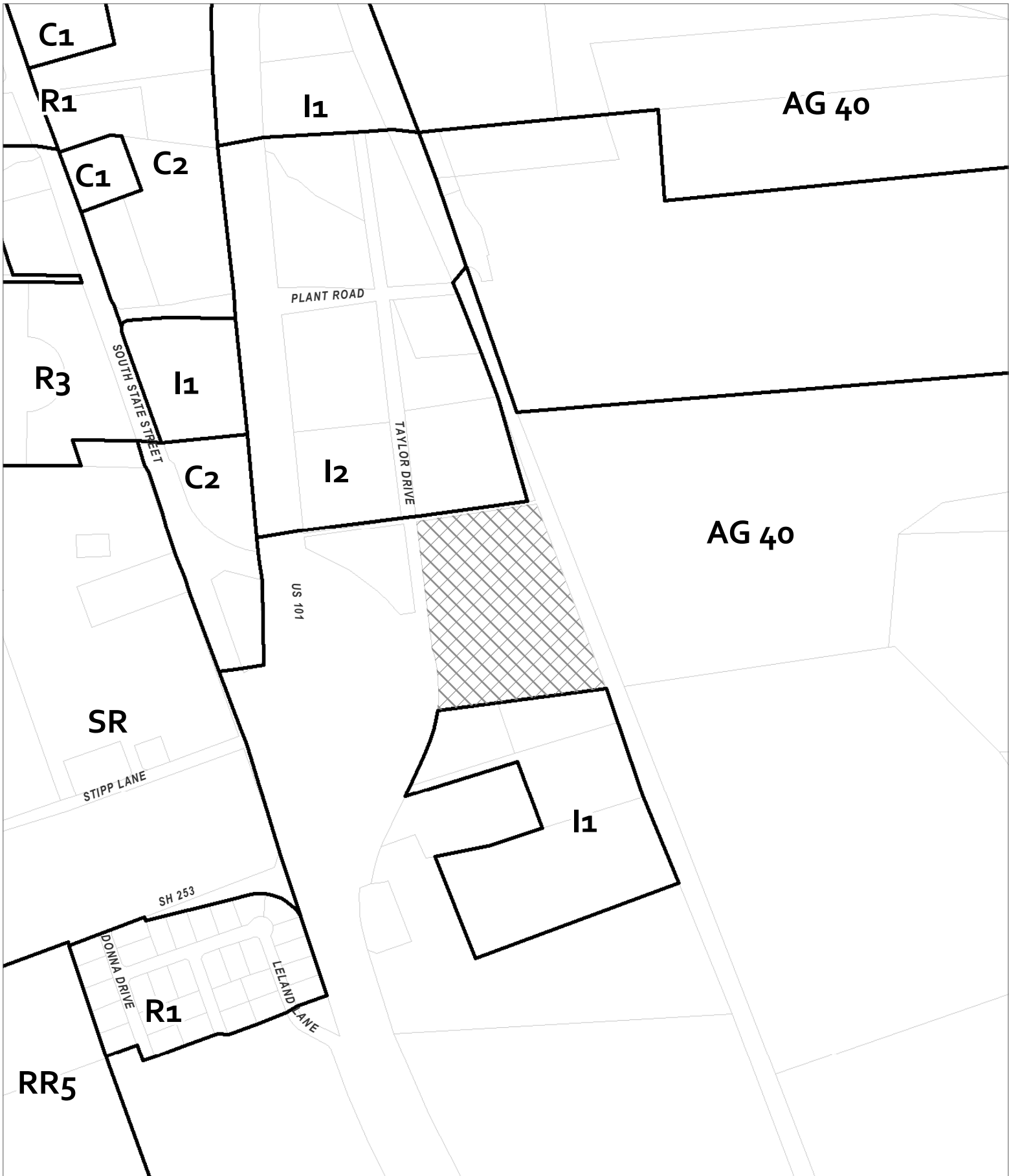
CASE: GP 2018-0002  
OWNER: GOLDEN, Mary ET AL  
APN: 184-140-10  
APLCT: Yulupa Investments, LLC  
AGENT: Rebecca Dalske  
ADDRESS: 3201 Taylor Drive, Ukiah




ADJACENT PARCELS

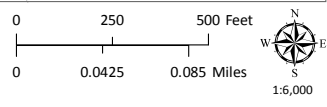
THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.  
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES





CASE: GP 2018-0002  
OWNER: GOLDEN, Mary ET AL  
APN: 184-140-10  
APLCT: Yulupa Investments, LLC  
AGENT: Rebecca Dalske  
ADDRESS: 3201 Taylor Drive, Ukiah

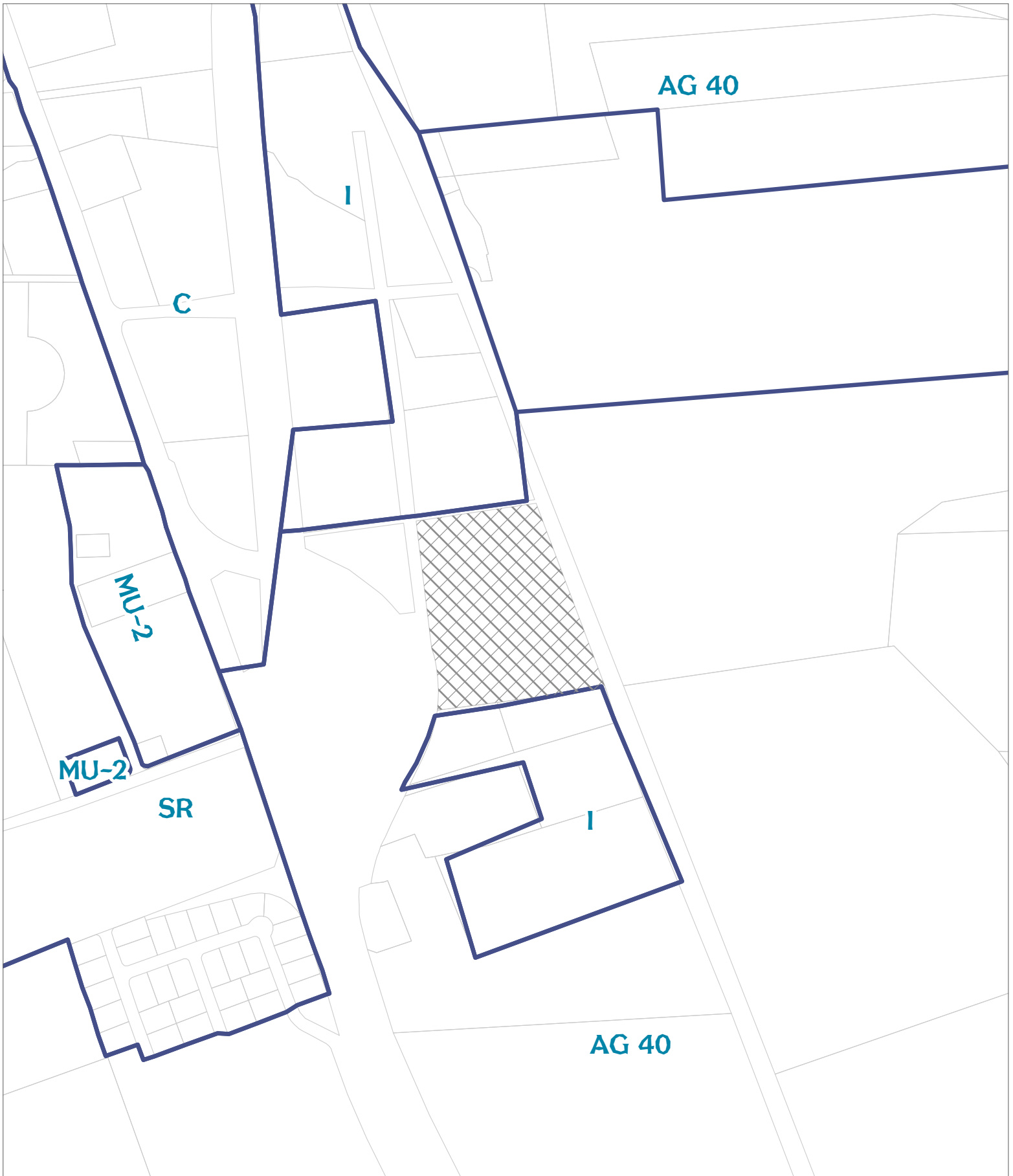
 Zoning Districts  
 Public Roads




ZONING DISPLAY MAP

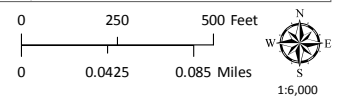
THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.  
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES





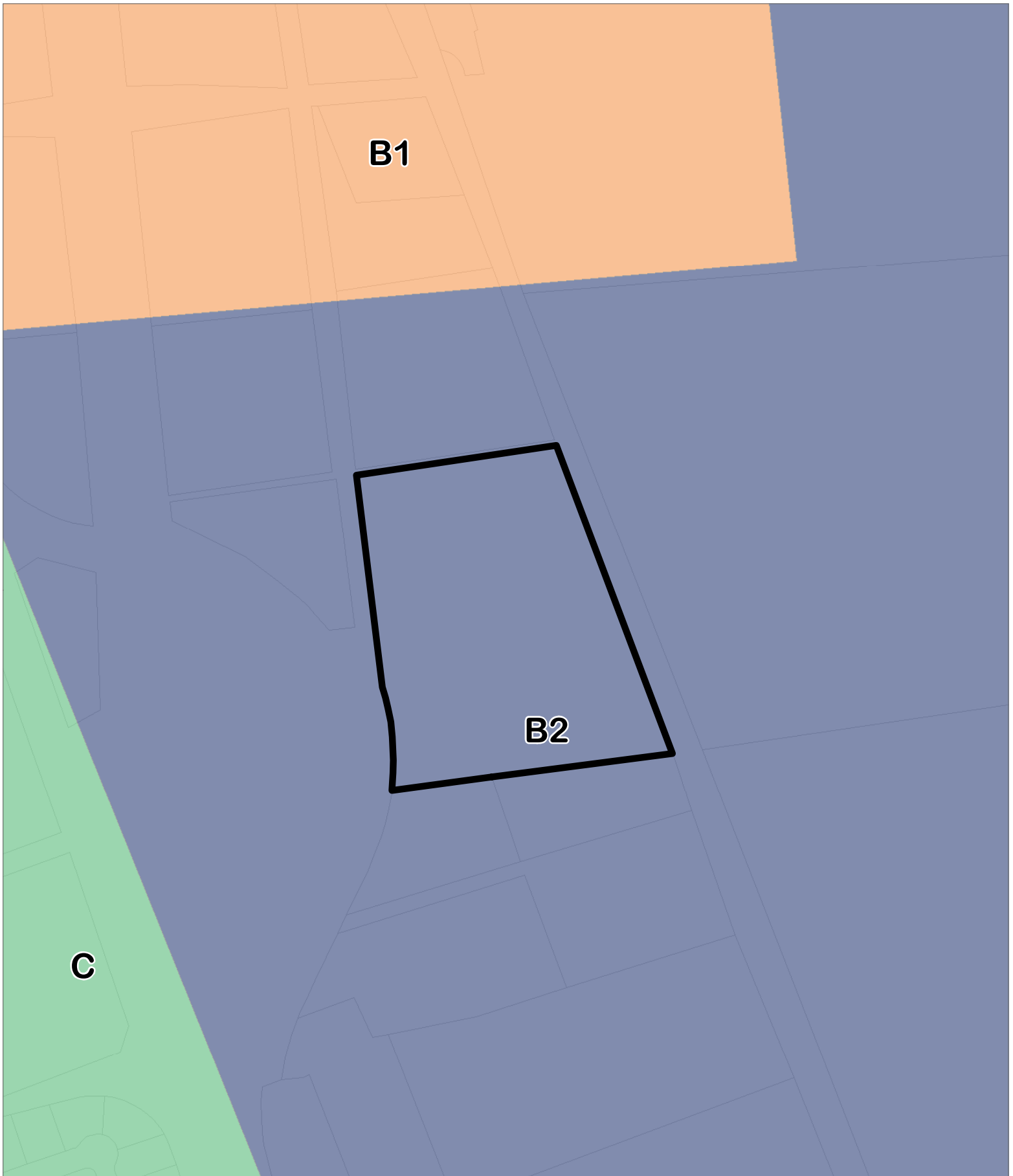
CASE: GP 2018-0002  
OWNER: GOLDEN, Mary ET AL  
APN: 184-140-10  
APLCT: Yulupa Investments, LLC  
AGENT: Rebecca Dalske  
ADDRESS: 3201 Taylor Drive, Ukiah

 General Plan Classes

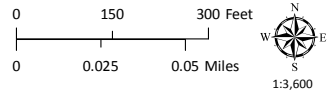


GENERAL PLAN CLASSIFICATIONS

**THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.**  
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES



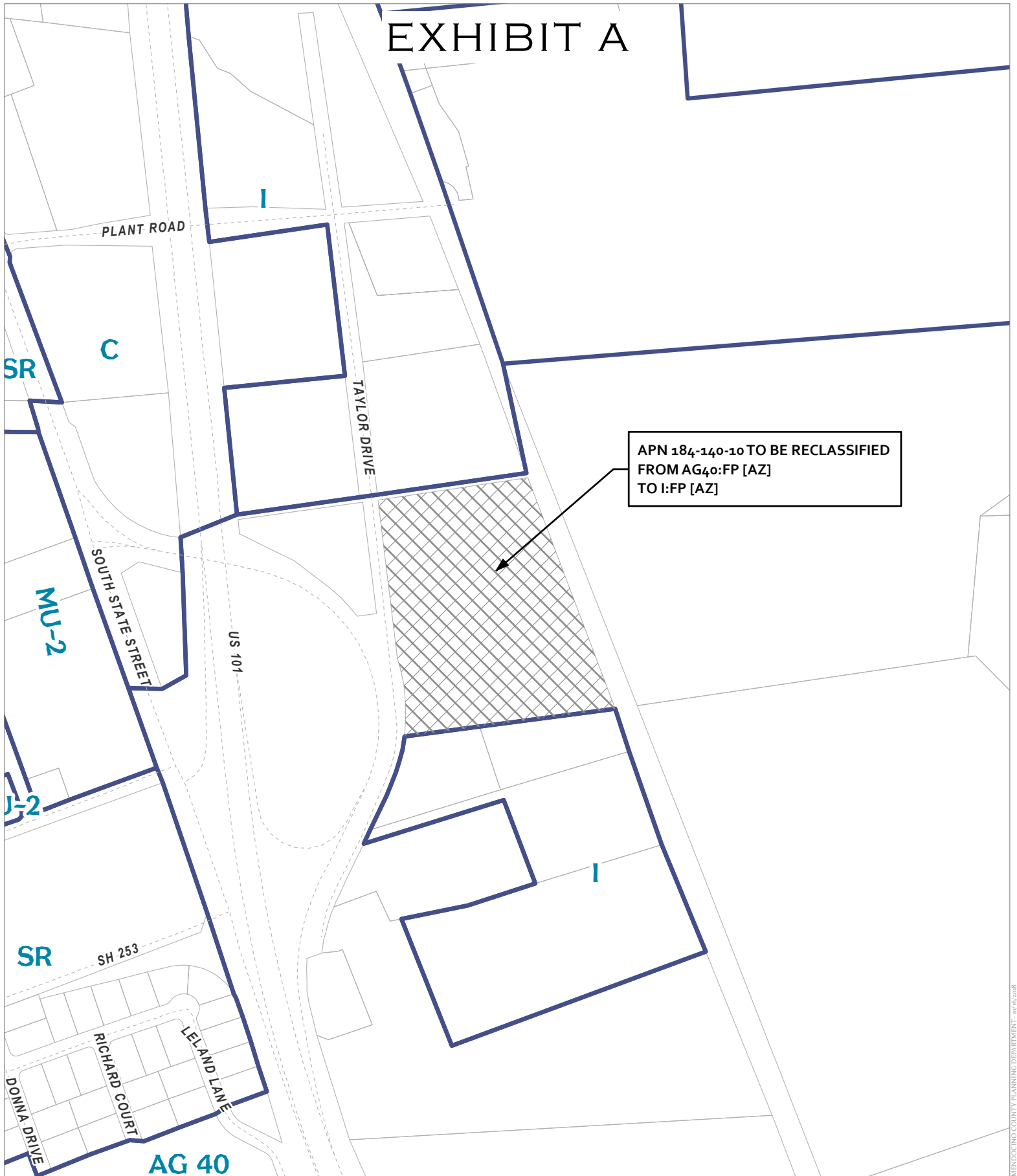
CASE: GP 2018-0002  
OWNER: GOLDEN, Mary ET AL  
APN: 184-140-10  
APLCT: Yulupa Investments, LLC  
AGENT: Rebecca Dalske  
ADDRESS: 3201 Taylor Drive, Ukiah



AIRPORT COMPATIBILITY ZONES


**THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.**  
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES

# EXHIBIT A




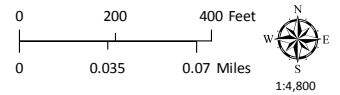
APN 184-140-10 TO BE RECLASSIFIED  
FROM AG40:FP [AZ]  
TO I:FP [AZ]

CASE: GP 2018-0002 / R 2018-0004  
OWNER: GOLDEN, Mary, ET AL  
APN: 184-140-10  
APLCT: Yulupa Investments, LLC  
AGENT: Rebecca Dalske  
ADDRESS: 3201 Taylor Drive, Ukiah

 RECLASSIFY FROM: AG:FP [AZ] (Agriculture, Flood Plain & Airport Zone)  
TO: I:FP [AZ] (Industrial, Flood Plain & Airport Zone)

 Public Roads

 General Plan Classes

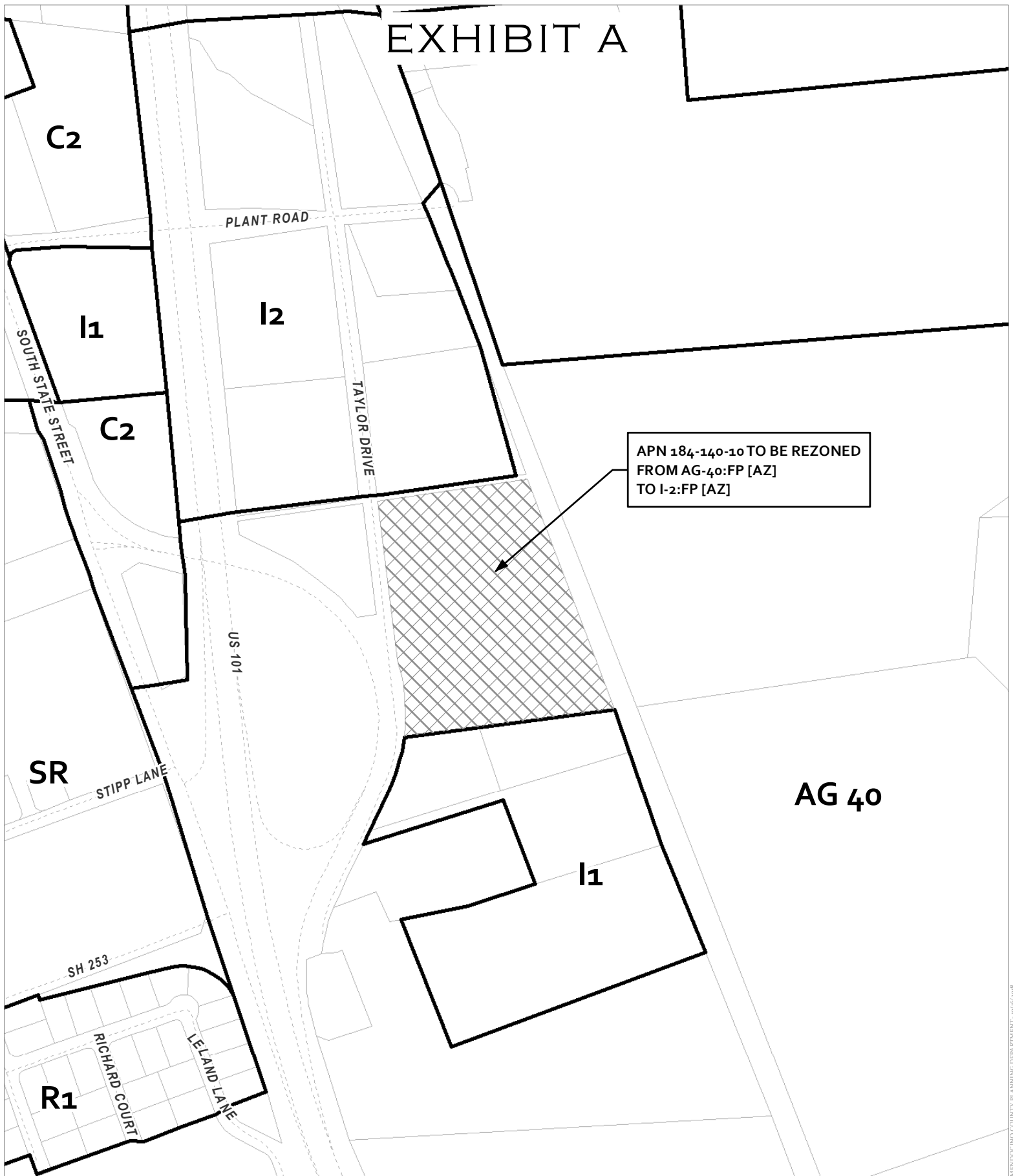


GENERAL PLAN AMENDMENT




**THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.**  
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES

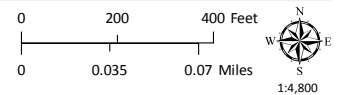


# EXHIBIT A



CASE: GP 2018-0002 / R 2018-0004  
OWNER: GOLDEN, Mary, ET AL  
APN: 184-140-10  
APLCT: Yulupa Investments, LLC  
AGENT: Rebecca Dalske  
ADDRESS: 3201 Taylor Drive, Ukiah

-  REZONE FROM: A-G:FP [AZ] (Agriculture, Flood Plain & Airport Zone)  
TO: I-2: FP [AZ] (General Industrial, Flood Plain & Airport Zone)
-  Zoning Districts
-  Public Roads



REZONE EXHIBIT

**THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.**  
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES

# **INITIAL STUDY and ENVIRONMENTAL CHECKLIST**

FOR

YULULPA INVESTMENTS, LLC PROPERTY ENTITLEMENTS

**July 2018**

**Lead Agency:  
County of Mendocino**



**Lead Agency Contact:**  
Susan Summerford, Planner III  
County of Mendocino  
Planning and Building Services  
860 North Bush Street, Ukiah, California 95482

**Prepared by:**  
**LACO Associates**  
**776 S. State St., Suite 102A**  
**Ukiah, California 95482**  
**(707) 462-0222**

**LACO Project No. 9016.01**

## TABLE OF CONTENTS

I. PROJECT SUMMARY .....	3
II. PROJECT DESCRIPTION.....	4
III. PROJECT SETTING AND LOCATION .....	5
IV. ENVIRONMENTAL EFFECTS.....	5
V. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED .....	6
VI. REFERENCES .....	56

## FIGURES AND APPENDICES

Figure 1: Site Vicinity Map

Figure 2: Plot Plan

Figure 3: Grading Permit Plot Plan

Figure 4: Land Use and Zoning Designations

Appendix A: Mitigation Monitoring and Reporting Program (MMRP)

Appendix B: California Emissions Estimator Model (CalEEMod) Emissions Results

Appendix C: Cultural Resources Correspondence



## I. PROJECT SUMMARY

**Date:** July 2018

**Project Title:** Yulupa Investments, LLC Property Entitlements

**Lead Agency:** County of Mendocino

**Contact:** Susan Summerford, Planner III  
County of Mendocino  
Planning and Building Services  
860 North Bush Street, Ukiah, California 95482  
(707) 234-6650

**Location:** The project site (Site), approximately 10 acres in size, is located south of the City of Ukiah limits in unincorporated Mendocino County, east of Highway 101 and directly east of Taylor Drive (see Figures 1 through 3).

**Coastal Zone:** No

**Affected Parcel(s):** Assessor's Parcel Number (APN: 184-140-10)

**Current Ukiah Valley Area Plan Land Use Designation:** Agricultural (AG) (see Figure 4)

**Current County of Mendocino Zoning Designation:** Agricultural Lands, 40 acre minimum parcel size (AG-40:FP[AZ]) (see Figure 4)

**Proposed Ukiah Valley Area Plan Land Use Designation:** Industrial (I:FP[AZ]) (see Figure 4)

**Proposed County of Mendocino Zoning Designation:** Inland General Industrial (I-2:FP[AZ]) (see Figure 4)

### Anticipated Permits and Approvals:

- 1) Adoption of Mitigated Negative Declaration (MND) by the County of Mendocino
- 2) Approval of the General Plan Amendment and Zone Reclassification Applications by the County of Mendocino

**CEQA Requirement:** The proposed project is subject to the requirements of the California Environmental Quality Act (CEQA). The Lead Agency is the County of Mendocino. The purpose of this Initial Study (IS) is to provide a basis for determining whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration. This IS is intended to satisfy the requirements of the CEQA (Public Resources Code, Div. 13, Sec. 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387).

CEQA encourages lead agencies and applicants to modify their projects to avoid significant adverse impacts (CEQA Section 20180(c) (2) and State CEQA Guidelines Section 15070(b) (2)).

Section 15063(d) of the State CEQA Guidelines states that an IS shall contain the following information in brief form:

- 1) A description of the project including the project location
- 2) Identification of the environmental setting
- 3) Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to provide evidence to support the entries
- 4) Discussion of means to mitigate significant effects identified, if any
- 5) Examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls
- 6) The name of the person or persons who prepared and/or participated in the Initial Study

**II. PROJECT DESCRIPTION:** Yulupa Investments, LLC (Applicant) is seeking approval of a general plan amendment and zone reclassification (GPA/ZR) to amend the Site's current land use and zoning designations of the approximately 10 acre property identified as Assessor's Parcel Number (APN) 184-140-10, located at 3201 Taylor Drive, Ukiah, in unincorporated Mendocino County, California (herein referred to as "project" or "proposed project") (see Figure 1). The Site has a current land use designation of Agricultural (AG) under the Ukiah Valley Area Plan (UVAP) and is zoned as Agricultural Lands, 40 acre minimum parcel size (AG-40:FP[AZ]) under the County of Mendocino Zoning Code. As the Site is less than 40 acres in size, it is an existing legal, non-conforming parcel. The Applicant would like to amend the Site's current land use and zoning designations to Industrial (I:FP[AZ]) and Inland General Industrial (I-2:FP[AZ]), respectively, to allow future industrial uses on the Site to be principally permitted (see Figure 4).

The Site is currently vacant and is located adjacent to several additional parcels owned and utilized by the Applicant for solid waste activities, including APNs 184-140-05, 184-170-02, -03, -06, -07, and -11 (see Figure 2). Following approval of the GPA/ZR, the Applicant is proposing to relocate existing uses currently located on a parcel north of Ukiah to the project Site, in order to centralize ongoing C&S Waste operations. The uses proposed for relocation include wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. The proposed relocation would no longer require materials to be transferred to the parcel north of Ukiah for processing. The proposed relocation would not occur until the requested GPA/ZR has been approved and industrial uses are allowed on-site. After approval of the GPA/ZR, an application for Development Review with more details of the proposed operations at the Site would be submitted. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the concrete pad. Although the clear span building is a permanent structure, it does not require a foundation and no excavation would be required.

Grading is proposed on the majority of the Site (approximately 9 acres) and is currently underway. A grading permit application was submitted to the County on June 15, 2018, with the permit issued on July 18, 2018. Grading activities at the Site will place 51,818 cubic yards of fill on-site to construct a finished grade pad (approximately 8 acres in size) one foot above flood elevations. Furthermore, a vegetative V-ditch will be constructed within the western portion of the Site, with vegetated drainage swales constructed within the eastern and southern portions of the Site. Silt fencing or fiber rolls will be installed outside of the grading limits, at the discretion of the contractor, and hydroseed would be applied to the disturbed soil areas for erosion control. As of the date of this Initial Study, grading has begun on-site. As such, the analysis contained in this Initial Study will focus on post-grading conditions, as the on-site grading activities will be required to comply with the conditions of the grading permit itself, which includes requirements, such as the incorporation of BMPs, to ensure potential impacts associated with the grading are minimized (see Figure 3).

**Concurrent Entitlements:** The Applicant is currently pursuing a separate boundary line adjustment (BLA) to establish an approximately 12 acre legal parcel, which includes the Site. While APNs 184-140-10 and 104-170-06, located to the south of the Site, would remain as separate tax parcels, the BLA would combine the two APNs to create the 12 acre legal parcel. The GPA/ZR application will be based upon the proposed lot lines identified in the concurrent BLA application. However, since the GPA/ZR and grading is only applicable to APN 184-140-10, the analysis contained in this Initial Study will only focus on the area contained within this APN.

**III. PROJECT SETTING AND LOCATION:** The Site, approximately 10 acres in size, is vacant and undeveloped and is located south of the Ukiah city limits within unincorporated Mendocino County, east of Highway 101, and directly east of Taylor Drive. The Site is currently accessed via a gated entrance off of Taylor Drive in the northwestern corner of the property. This would remain as the principal Site access point until such time as the proposed industrial uses are principally permitted on-site and the Site is able to connect to existing C&S Waste access roads. The Site was formerly utilized for agricultural use (orchard). Vegetation at the Site primarily consists of grasses, blackberry bramble, and weedy species. A row of existing mature cottonwood trees is located along the Site's western boundary, with cottonwood saplings located in the southwestern portion of the Site. During the on-site grading activities, existing vegetation, except for the mature cottonwood trees currently located along the Site's western boundary, will be removed. Grading will observe a minimum 5 foot setback from the dripline of the mature cottonwood trees. Connection to Pacific Gas and Electric Company (PG&E) for electrical service is also anticipated under the project.

As discussed above, since grading has already commenced on-site, the analysis contained in this Initial Study will focus on post-grading conditions. As such, it is assumed the Site has received 51,818 cubic yards of fill, which has been distributed across the Site to create a finished grade pad one foot above flood elevations, the vegetated v-ditch and drainage swales have been constructed on-site, existing on-site vegetation, including the cottonwood saplings in the southwestern portion of the Site, have been removed, and the area disturbed under grading has been hydroseeded, per the grading plans included with the grading application, submitted to the County on June 15, 2018.

As noted above, the Site is located adjacent to and north of several additional parcels owned and utilized by the Applicant for industrial uses, specifically solid waste services. The Ukiah Transfer Station and Recycling Center is located directly north of the Site. Surrounding uses include existing industrial uses to the north and south, existing Northwestern Pacific Railroad (NWPRR) railroad tracks and agricultural land to the east, and Taylor Drive, Highway 101, and the Highway 101 on- and off-ramps to the west of the Site. A single-family residential neighborhood is located approximately 925 feet southwest of the Site. The Site is located approximately 480 feet east of Highway 101, approximately 860 feet northeast of State Route 253, and approximately 1,110 feet west of the Russian River. Further north of the Site are a lumber yard, health club, storage yard, Mendocino Transit Authority (MTA) yard, County Animal Control facility, and the City of Ukiah wastewater treatment facility. Existing drainage ditches are located just north and east of the project Site, flowing west to east and northwest to southeast, respectively. The analysis contained in this Initial Study also assumes the vegetative swales in the southern and eastern portions of the Site and the vegetated V-ditch along the Site's western boundary, proposed under the grading permit, have been constructed. The Site is not known to contain any wetland or riparian areas (USFWS, 2018).



**IV. ENVIRONMENTAL EFFECTS:** An environmental checklist follows this section, and addresses all potential adverse effects resulting from the proposed project. No significant adverse effects are expected from any of the proposed activities.

**V. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:** The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a **"Potentially Significant Impact"** or **"Potentially Significant Unless Mitigation Incorporated"** as indicated by the checklists on the following pages.

	Aesthetics		Agriculture and Forestry Resources	X	Air Quality
X	Biological Resources		Cultural Resources		Energy
X	Geology/Soils	X	Greenhouse Gas Emissions		Hazards & Hazardous Materials
X	Hydrology/Water Quality		Land Use/Planning		Mineral Resources
	Noise		Population/Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
	Utilities/Service Systems		Wildfire		Mandatory Findings of Significance

An explanation for all checklist responses is included, and all answers take into account the whole action involved and the following types of impacts: off-site and on-site; cumulative and project-level; indirect and direct; and construction and operational. The explanation of each issue identifies (a) the threshold of significance, if any, used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance. All mitigation measures are provided in the Mitigation Monitoring and Reporting Program (MMRP) (see Appendix A).

In the checklist the following definitions are used:

**"Potentially Significant Impact"** means there is substantial evidence that an effect may be significant.

**"Potentially Significant Unless Mitigation Incorporated"** means the incorporation of one or more mitigation measures can reduce the effect from potentially significant to a less than significant level.

**"Less Than Significant Impact"** means that the effect is less than significant and no mitigation is necessary to reduce the impact to a lesser level.

**"No Impact"** means that the effect does not apply to the proposed project, or clearly will not impact nor be impacted by the proposed project.

**DETERMINATION: (To be completed by the Lead Agency on the basis of this initial evaluation)**

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Susan Summerford, Planner III

I. AESTHETICS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Thresholds of Significance:** The project would have a significant effect on aesthetics if it would have a substantial adverse effect on a scenic vista; substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway; substantially degrade the existing visual character or quality of public views of the site and its surroundings; conflict with applicable zoning and other regulations governing scenic quality (if the project is in an urbanized area); or create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

**DISCUSSION:** The Site is located in an area with other urbanized commercial and industrial uses that are visible from the highway, including, but not limited to, a solid waste transfer station, lumber yard, a health club, and storage yard. A Mendocino Transit Authority (MTA) yard, County Animal Control facility, wastewater treatment facility, a single-family residential neighborhood, and agricultural fields are also located near the Site. The Site, which is vacant, was formerly utilized for agricultural use (orchard) and contains blackberry bramble, weedy species, and grasses on-site. Existing trees are located along the Site's western and northern boundaries. Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Potential future development plans include a concrete pad and clear span structure that would be located on top of the pad.

As of the date of this Initial Study, grading has begun on-site. As such, the analysis contained in this Initial Study focuses on post-grading conditions, as the on-site grading activities will be required to comply with the conditions of the grading permit itself, which includes requirements, such as the incorporation of BMPs, to ensure potential impacts associated with the grading are minimized. Therefore, under the analysis, it is assumed the Site has received 51,818 cubic yards of fill, which has been distributed across the Site to create a finished grade pad one foot above flood elevations, the vegetated v-ditch and vegetated drainage swales have been constructed on-site in the western, eastern, and southern portions of the Site, existing on-site vegetation, including the cottonwood saplings in the southwestern portion of the Site, have been removed, and the area disturbed under grading has been hydroseeded.

I.a) The proposed project, including the relocation of processing activities from a parcel north of Ukiah to the Site and potential future construction of a concrete pad and clear span building on-site, would change the visual character of the Site; however, existing trees located between the Site and Highway 101

provide some screening of the property. Due to existing trees along the Site's northern and western boundaries and adjacent to the South State Street off-ramp and north-bound Highway 101 on-ramp, views of the Site are partially obstructed when traveling along Taylor Drive (CR# 143) and the Site is only briefly visible when traveling along Highway 101. The County General Plan and Ukiah Valley Area Plan (UVAP) do not designate the Site or surrounding area as scenic vistas. As a result, the proposed project, in addition to proposed processing activities at the Site, would not adversely affect any scenic view. A less than significant impact would occur.

I.b) Under CEQA, visual resources that uniquely contribute to the public benefit are considered to be scenic resources. There are no officially designated scenic highways in Mendocino County, although the California Department of Transportation (Caltrans) has identified a portion of Highway 101, Highway 1, and Highway 20 as being eligible for designation as a State Scenic Highway (Caltrans, 2017). No impact would occur.

I.c) The proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The Site was formerly utilized for agricultural use, but is now proposed to be utilized for solid waste processing activities, similar to existing uses to the north and south of the Site. As previously discussed, the Site is located adjacent to several additional parcels owned and utilized by the Applicant for solid waste activities. Other urbanized commercial and industrial uses that are visible from the highway are located near the Site, including a solid waste transfer station, lumber yard, and bus storage depot.

Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. The industrial uses proposed at the Site would be similar to other uses located adjacent to the Site. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. Although the Site is currently designated and zoned as Agricultural, the project involves a general plan amendment and zone reclassification (GPA/ZR) in order to amend the Site's current designations to Industrial, in order for industrial uses to be principally permitted at the Site. Since the proposed project and future relocation of an existing industrial use to the Site would be consistent with adjacent land use and zoning designations, other uses in the area, and would not include any development at the Site at this time, a less than significant impact would occur.

I.d) As discussed above, processing activities proposed to be relocated to the Site once industrial uses are allowed on-site, would occur during the daytime, thereby substantially reducing the need for and use of lighting at the Site. As a result, the proposed project would not create a new source of substantial light or glare. Should any lighting, including nighttime safety or security lighting, be utilized at the Site, it would be required to be downcast and shielded and positioned in a manner as to not shine or allow light glare to extend beyond the boundaries of the Site. Furthermore, any development to occur at the Site in the future, including the potential future development of a clear span structure on top of a concrete pad, would be required to use non-reflective materials. A less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Aesthetics.

II. AGRICULTURE AND FORESTRY RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Thresholds of Significance:** The project would have a significant effect on agriculture and forestry resources if it would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (hereafter "farmland"), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses; conflict with existing zoning for agricultural use or a Williamson Act contract; conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)); Result in the loss of forest land or conversion of forest land to non-forest use; or involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use.

**DISCUSSION:** The Site is currently vacant, but was formerly utilized for agricultural uses (orchard). The 10 acre Site has a land use designation of Agricultural (AG) under the Ukiah Valley Area Plan (UVAP) and is zoned as Agricultural Lands, 40 acre minimum parcel size (AG-40:FP[AZ]) under the County of Mendocino Zoning Code. The Applicant is requesting approval of a general plan amendment and zone reclassification (GPA/ZR) to amend the Site's current land use and designations to Industrial (I-2:FP[AZ]) and Inland General Industrial (I-2:FP[AZ]) (see Figure 4), respectively, in order for future industrial uses to be principally permitted at the Site. Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad.



As shown on the California Department of Conservation's California Important Farmland Finder, the Site is primarily designated as Prime Farmland (9.9 acres), with a narrow strip of Unique Farmland along the Site's northern and western boundaries (California Department of Conservation, 2017a).

II.a-b) As described above, the Site is primarily designated as Prime Farmland (9.9 acres), with a narrow strip of Unique Farmland along the Site's northern and western boundaries (California Department of Conservation, 2017a). Since the proposed project involves a GPA/ZR to amend the Site's current Agricultural land use and zoning designations to Industrial in order for industrial uses to be principally permitted at the Site, the proposed project would convert Prime Farmland and Unique Farmland to a non-agricultural use.

Data from the California Department of Conservation indicates that, as of 2016, 18,130 acres of Prime Farmland and 7,625 acres of Unique Farmland exists within the County. Additionally, while the amount of Prime Farmland in the County has declined by 2,559 acres between 2006 to 2016, with an average loss of 256 acres per year, the amount of Unique Farmland within the County has increased (by 656 acres, with an average annual increase of 66 acres) over the same 10 year period (California Department of Conservation, 2017c). The amount of Prime Farmland (9.9 acres) and Unique Farmland (0.1 acres) proposed to be redesignated and rezoned as Industrial accounts for approximately 0.050 and 0.001 percent of the County's total Prime Farmland and Unique Farmland, respectively.

Although the Site is currently zoned as AG-40:FP[AZ] under the County of Mendocino Zoning Code, the Site is not currently under a Williamson Act contract (California Department of Conservation, 2017b). The proposed project involves a GP/ZR to amend the Site's current land use and zoning designations to Industrial in order for industrial uses to be principally permitted at the Site. As previously discussed, the Applicant proposes to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad.

Pursuant to Policy OC3.1b (Agricultural Land Conversion Criteria) in Section 9, Open Space and Conservation, of the Ukiah Valley Area Plan (UVAP), *"proposals to convert Agricultural Lands to non-agricultural classification will be considered only after satisfying the following requirements:*

- *The project shall not result in a need for premature expansion of infrastructure in conflict with other Area Plan policies.*
- *The project shall not have a significant adverse effect on agricultural uses in the area.*
- *The project site is substantially unusable for agricultural purposes due to encroaching adjacent nonagricultural uses.*
- *The proposal must achieve the long-range goals of the General Plan and Area Plan for the area as it exists prior to the proposal."*

The proposed project would be consistent with Policy OC3.1b of the UVAP for the following reasons:

1. No infrastructure would be required at Site since no development is currently proposed;
2. Agricultural areas and uses directly east of the Site would remain and would not be impacted by the anticipated future use of the Site;

3. Nonagricultural uses are encroaching upon the Site. The uses north and south of the Site are industrial in nature. The Site is located adjacent to additional properties owned and utilized by the Applicant for solid waste processing activities and other industrial uses. Agricultural uses are located east of the Site, and, as noted above, would not be impacted by the proposed project;
4. The proposed project would be consistent with the objectives, goals, and policies of both the County General Plan and UVAP.

A less than significant impact would occur.

II.c-d) The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production, or result in the loss of forest land. The Site is currently designated and zoned as AG40:FP[AZ] and AG-40:FP[AZ], respectively, and is proposed to be amended to Industrial, in order for industrial uses to be principally permitted on-site. Additionally, the Site also contains a row of existing trees along the northern and western boundaries of the Site, which would not be impacted under the project. No impact would occur.

II.e) The proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Agricultural and Forestry Resources.

III. AIR QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Thresholds of Significance:** The project would have a significant effect on air quality if it would conflict with or obstruct implementation of applicable air quality plans; violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation; expose sensitive receptors to substantial pollutant concentrations; or result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people.

**DISCUSSION:** Air pollution control in the State of California is based on federal, state, and local laws and regulations. The federal Environmental Protection Agency (EPA), California EPA (CalEPA), and regional clean air agencies, all regulate air quality. Federal and State agencies establish maximum concentrations for a wide variety of pollutants such as particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), ozone, and other smog precursors (NO<sub>x</sub> and ROG).

The project Site is located within the North Coast Air Basin (NCAB) and is subject to the Mendocino County Air Quality Management District's (MCAQMD) requirements. The MCAQMD is one of 35 local Air Districts in California. Air Districts in California must develop regulations based on the measures identified in the Clean Air Act and its Clean Air Plan, as well as State regulations. New rules are developed and existing rules are amended to ensure reduced emissions in compliance with these federal and State regulations, as well as to protect and improve public health, air quality, and the global climate (MCAQMD, n.d.).

The MCAQMD has also adopted a *Particulate Matter Attainment Plan* (Attainment Plan), dated January 2005, which includes a description of local air quality, the sources of local particulate matter (PM) emissions, and recommended control measures to reduce future PM levels. The United States Environmental Protection Agency (US EPA) has set thresholds for each of the seven criteria pollutants, which include: ozone (O<sub>3</sub>), carbon monoxide (CO), oxides of nitrogen (NO<sub>x</sub>), lead (Pb), sulfur dioxide (SO<sub>2</sub>), particulate matter less than 10 microns in size (PM<sub>10</sub>), and particulate matter less than 2.5 microns in size (PM<sub>2.5</sub>). Each criteria pollutant can have two thresholds or standards – one that is protective of human health and one that is protective of public welfare. The California Air Resources Board (CARB) standards for the seven criteria pollutants are generally more stringent than the US EPA standards. The State also has additional standards for visibility reducing particles (of any size), sulfates, and hydrogen sulfide (H<sub>2</sub>S). These standards are based on observable short-term (acute) health effects (MCAQMD, 2005).

The MCAQMD has been determined to be in "attainment", or within allowable limits, for all federal air quality standards and in "attainment" of all State air quality standards, except for PM<sub>10</sub>. The MCAQMD is in "non-attainment" for the annual average PM<sub>10</sub> standard and the 24-hour PM<sub>10</sub> standard. However, the California Clean Air Act does not require attainment plans or transportation conformity for Districts that exceed the PM<sub>10</sub> standard, but only requires the MCAQMD to make reasonable efforts toward coming into attainment, which is defined as a five percent reduction in emissions per year, until the standard is attained. While PM<sub>10</sub> levels have dropped over the last 20 years, due to changing industrial base, enhanced regulations, and increased enforcement by the MCAQMD, the MCAQMD still exceeds the State PM<sub>10</sub> level several times a year. The majority of these exceedances result from wildfires, residential wood burning, unpaved roads, and construction activities. As the population within the MCAQMD continues to grow, emissions from many of these sources are likely to increase (MCAQMD, 2005).

As noted in Chapter 4, Resource Management Element, of the Mendocino County General Plan, the main source of PM<sub>10</sub> in the County is dust generated from unpaved road, accounting for approximately 60 percent of the County's PM<sub>10</sub> emissions. Other significant sources of the County's PM<sub>10</sub> emissions include home heating (fireplaces and wood stoves), ocean spray (along the coast), pollen from trees and plants, dust from paved roads, and construction and demolition (General Plan, 2009).

Emissions from the project would be comprised of direct and indirect emissions. On-site emission sources at the site include stationary, mobile and fugitive sources. Direct emissions from on-site activities, including exhaust and fugitive dust, would result from operation of the processing equipment. Indirect emissions would be produced by hauling trucks and other vehicles, including employees, traveling to and from the project Site. Since vehicles are known to be a major pollution contributor, producing significant amounts of NO<sub>x</sub>, CO, O<sub>3</sub> and particulate matter, they must be considered when evaluating potential air quality impacts of a proposed project.

The project and its emission sources are subject to the rules and regulations contained in the most recent version of the *Rules and Regulations* of the MCAQMD. The MCAQMD has also identified significance thresholds for use in evaluating project impacts under CEQA, provided in Table 1, below. [Please note: the

MCAQMD does not specify thresholds for SO<sub>2</sub>. As a result, the Best Available Control Technology (BACT) emission rates for stationary sources, utilized by the North Coast Unified Air Quality Management District (NCUAQMD) specific to SO<sub>2</sub> are used for this analysis.]

Table 1. MCAQMD Significance Thresholds

Criteria Pollutant and Precursors	Construction Related		Operational Related	
	Average Daily Emissions (lb/day)	Maximum Annual Emissions (tons/year) <sup>1</sup>	Indirect Source	Project/Stationary Source
ROG	54	10	180	40
NOx	54	10	42	40
PM <sub>10</sub>	82	15	82	15
PM <sub>2.5</sub>	54	10	54	10
Fugitive Dust (PM <sub>10</sub> /PM <sub>2.5</sub> )	Best Management Practices	--	same as above	
Local CO	--	--	125 tons/year	
SO <sub>2</sub> *	--	--	80	40
<p>Notes:</p> <p><sup>1</sup> = Specific maximum allowable annual emissions related to construction was not provided by MCAQMD and was calculated based on the maximum average daily emissions thresholds.</p> <p>* = Since MCAQMD does not specify thresholds for SO<sub>2</sub>, the threshold for SO<sub>2</sub> utilized by NCUAQMD is used for this analysis.</p> <p>Source: MCAQMD, 2010, and North Coast Unified Air Quality Management District (NCUAQMD) Rules and Regulations. Regulation 1, Rule 110. Best Available Control Technology (BACT). July 9, 2015. Available at: <a href="http://www.ncuaqmd.org/files/rules/reg%201/Rule%20110.pdf">http://www.ncuaqmd.org/files/rules/reg%201/Rule%20110.pdf</a>.</p>				

Air quality impacts anticipated under development of the proposed project were modeled using the California Emissions Estimator Model (CalEEMod) to quantify potential criteria pollution and greenhouse gas (GHG) emissions associated with Site preparation, and operation of the proposed project, including the processing activities to be relocated to the Site. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Further, the model identifies mitigation measures to reduce criteria pollutants and GHG emissions along with calculating the benefits achieved from measures chosen by the user (CalEEMOD, 2017). Since grading has begun on-site as of the date of this Initial Study, the analysis contained in this Initial Study will focus on post-grading conditions.

The CalEEMOD results in their entirety are included in Appendix B. The CalEEMod model assumes default assumptions for general heavy industrial use. The analysis assumes site preparation, including the relocation of existing uses from the parcel north of Ukiah to the Site, would begin in March 2019 and be completed over a one-week period (assuming 5 work days per week). No demolition, grading, building construction, paving, or architectural coating is proposed to occur under the project. Additionally, the CalEEMod analysis includes basic construction- and operational-level mitigation measures, including watering exposed areas and reducing vehicle speeds on unpaved roads. The results of the CalEEMod analysis are shown in Table 2 below, which represents the total amount of emissions anticipated over the 5-day construction (site preparation) period and under operation of the project.

Table 2. CalEEMod Results for Construction and Operation of the C&S Waste Site

Pollutant	Construction Emissions (tons/year)			Operational Emissions (tons/year)		
	Modeled Unmitigated Construction Emissions	Modeled Mitigated Construction Emissions (including % reduction)	Annual Thresholds	Modeled Unmitigated Operational Emissions	Modeled Mitigated Operational Emissions (including % reduction)	Annual Thresholds
Carbon monoxide (CO)	0.0582	0.0582 (no change)	--	1.3873	1.3873 (no change)	125
Nitrogen oxides (NO <sub>x</sub> )	0.1143	0.1143 (no change)	10	1.7772	1.7772 (no change)	40
Particulate matter (PM <sub>10</sub> ) (fugitive)	0.1548	0.0753 (-51.38%)	--	0	0	15
Particulate matter (PM <sub>10</sub> ) (exhaust)	0.0060	0.0060 (no change)	15	0.0909	0.0909 (no change)	15
Particulate matter (PM <sub>2.5</sub> ) (fugitive)	0.0358	0.0167 (-53.41%)	--	0	0	10
Particulate matter (PM <sub>2.5</sub> ) (exhaust)	0.0055	0.0055 (no change)	10	0.0866	0.0866 (no change)	10
Reactive organic gases (ROG)	0.0112	0.0112 (no change)	10	0.2015	0.2015 (no change)	40
Sulfur dioxide (SO <sub>2</sub> )	0.0001	0.0001 (no change)	--	0.0030	0.0030 (no change)	40

Source: CalEEMod Model Results, July 19, 2018, Appendix B.

As shown in Table 2, above, the anticipated emissions associated with site preparation on-site would be well-below MCAQMD's annual thresholds of significance for the six listed criteria pollutants, including carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>, both fugitive and exhaust), reactive organic gases (ROG), and sulfur dioxide (SO<sub>2</sub>) without any mitigation; however, with implementation of standard mitigation measures during site preparation, PM<sub>10</sub> and PM<sub>2.5</sub> (fugitive) emissions would be further reduced. Additionally, both unmitigated and mitigated operational emissions would also be well-below the MCAQMD's annual thresholds of significance. The proposed project would be required to comply with MCAQMD emissions standards to reduce exhaust emissions and control fugitive dust during construction and operation of the project (see Mitigation Measure AIR-1). Additionally, all construction and processing equipment utilized on-site would be required to be kept in good working condition (see Mitigation Measure AIR-2) in order to further minimize potential air quality impacts associated with the project.

As previously discussed, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Since the proposed uses are currently under operation on the parcel north of Ukiah, the operational emissions anticipated under the project would be similar to the emissions currently experienced at the parcel north of Ukiah. Additionally, since the need to transport materials to the parcel north of Ukiah would be eliminated, vehicular and truck emissions would be anticipated to be reduced. Potential future development plans for the Site include a concrete pad and clear span structure that would be located on top of the pad.



III.a-b) As noted above, the County is in “non-attainment” for PM<sub>10</sub>. Therefore, any use or activity that generates unnecessary airborne particulate matter may be of concern to the MCAQMD and has the potential to create significant project-specific and cumulative effects to air quality. Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah, once industrial uses are allowed on-site, in order to centralize operations. As a result, the proposed project would no longer require materials to be transferred to the parcel in the northern portion of Ukiah for processing, which would be anticipated to minimize emissions. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad.

Since the proposed project would include relocation of the existing uses from the parcel north of Ukiah to the Site, in addition to the potential future development of a clear span structure on top of a concrete pad, once industrial uses are allowed on-site, the project would generate both temporary and operational emissions. As shown in Table 2, above, the anticipated emissions associated with site preparation and processing activities would be well-below MCAQMD’s annual thresholds of significance for the six listed criteria pollutants, including carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>, both fugitive and exhaust), reactive organic gases (ROG), and sulfur dioxide (SO<sub>2</sub>) without any mitigation. However, the proposed project would be required to comply with MCAQMD emissions standards to reduce exhaust emissions and control fugitive dust during construction and operation of the project (see Mitigation Measure AIR-1). Additionally, all construction and processing equipment utilized on-site would be required to be kept in good working condition (see Mitigation Measure AIR-2) in order to further minimize potential air quality impacts associated with the project.

With the incorporation Mitigation Measures AIR-1 and AIR-2, the proposed project would not conflict with or obstruct implementation of federal, State, or MCAQMD standards, or MCAQMD’s Attainment Plan; violate any air quality standard; or result in a cumulatively considerable net increase in the PM<sub>10</sub> non-attainment levels in Mendocino County. As such, with mitigation incorporated, a less than significant impact would occur.

III.c-d) Sensitive receptors are defined as people that have an increased sensitivity to air pollution or environmental contaminants, and include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s). The nearest sensitive receptors to the Site include single-family residences within a neighborhood located approximately 960 feet southwest of the Site, across Highway 101.

The proposed project and proposed processing activities on-site would be anticipated to create exhaust and fugitive dust. Emissions expected from construction equipment associated with relocation of the existing uses currently located at a parcel north of Ukiah to the Site and potential future development of a clear span structure on top of a concrete pad on-site would be minimal, but, for short periods of time, may slightly impact residents living near the project Site. Processing activities proposed to be relocated to the Site would also be anticipated to result in exhaust and fugitive dust, due to operation of the processing equipment, use of heavy equipment (loader and truck), and from employees traveling to and from the Site. However, given the distance to the nearest sensitive receptors and with implementation of Mitigation Measures AIR-1 and AIR-2, which requires suppression of fugitive dust during construction and operation, pursuant to Rule-1-430 (Fugitive Dust Emissions) of Chapter IV (Prohibitions) of Regulation 1 (Air Pollution Control Rules) of the MCAQMD’s *Rules and Regulations*, and maintaining all equipment in good working,

fugitive dust and exhaust emissions would be minimized. With mitigation incorporated, a less than significant impact would occur.

#### MITIGATION MEASURES:

**AIR-1:** At all times, site preparation and processing activities at the Site shall occur in compliance with Rule-1-430 (Fugitive Dust Emissions) of Chapter IV (Prohibitions) of Regulation 1 (Air Pollution Control Rules) of the MCAQMD's *Rules and Regulations* to reduce the amount of fugitive dust generated by site preparation and processing activities. The project contractor and operator shall be required to do the following:

- All visibly dry disturbed soil road surfaces shall be watered to minimize fugitive dust emissions.
- All unpaved surfaces, unless otherwise treated with suitable chemicals or oils, shall have a posted speed limit of 10 miles per hour.
- Earth or other material that has been transported by trucking or earth moving equipment, erosion by water, or other means onto paved streets shall be promptly removed.
- Asphalt, oil, water or suitable chemicals shall be applied on materials stockpiles, and other surfaces that can give rise to airborne dusts.
- All earthmoving activities shall cease when sustained winds exceed 15 miles per hour.
- The operator shall take reasonable precautions to prevent the entry of unauthorized vehicles onto the site during non-work hours.
- The operator shall keep a daily log of activities to control fugitive dust.

**AIR-2:** At all times, construction and processing equipment utilized on-site shall be maintained in good condition to minimize excessive exhaust emissions.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact with Mitigation Incorporated** on Air Quality.

IV. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IV. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Thresholds of Significance:** The project would have a significant effect on biological resources if it would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means; interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

**DISCUSSION:** The approximately 10 acre Site is currently vacant and undeveloped. The Site was formerly utilized for agricultural use (orchard) and contains grasses, blackberry bramble, weedy species on-site. A row of existing mature cottonwood trees is located along the Site's western boundary, with cottonwood saplings located in the southwestern portion of the Site. Existing drainage ditches are located just north and east of the project Site, flowing west to east and northwest to southeast, respectively. The Site is located approximately 1,110 feet west of the Russian River.

Grading is proposed on the majority of the Site (approximately 9 acres) and is currently underway. Since grading has begun on-site as of the date of this Initial Study, the analysis contained in this Initial Study focuses on post-grading conditions, since the on-site grading activities will be required to comply with the conditions of the grading permit itself, which includes requirements, such as the incorporation of BMPs, to ensure potential impacts associated with the grading are minimized. Therefore, under the analysis, it is assumed the Site has received 51,818 cubic yards of fill, which has been distributed across the Site to create a finished grade pad one foot above flood elevations, the vegetated v-ditch and drainage swales have been constructed on-site, existing vegetation on-site, including the cottonwood saplings in the southwestern portion of the Site, have been removed, and the area disturbed under grading has been hydroseeded.

The Site is not known to contain any wetland or riparian areas (USFWS, 2018). However, as provided by the U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation (IPaC) System, 8 bird,

amphibian, and flowering plant species, listed as threatened or endangered under the Endangered Species Act (ESA) have the potential to occur at the Site. Additionally, per the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB), there are 16 special status species with the potential to occur within the Elledge Peak Quad, which includes the Site. Furthermore, the California Native Plant Society's (CNPS) *Inventory of Rare and Endangered Plants* lists 6 rare or endangered plants with the potential to occur within the Elledge Peak Quad. The candidate, sensitive, or special status species with the potential to occur at the Site are listed in Table 3, below. The existing cottonwood trees may provide potential habitat for special status species; however, because the Site has been previously utilized for agricultural use, located adjacent to existing industrial uses, and has recently been graded, there is limited potential for any special status plant or wildlife species to be present at the Site.

Table 3. Species with the Potential to Occur at the Site

Common Name	Scientific Name
<b>Birds</b>	
Marbled murrelet	<i>Brachyramphus marmoratus</i>
Northern spotted owl	<i>Strix occidentalis caurina</i>
Western snowy plover	<i>Charadrius alexandrinus nivosus</i>
Yellow-billed cuckoo	<i>Coccyzus americanus</i>
Oak titmouse	<i>Baeolophus inornatus</i>
Lewis' woodpecker	<i>Melanerpes lewis</i>
<b>Mammals</b>	
North American porcupine	<i>Erethizon dorsatum</i>
<b>Amphibians</b>	
California red-legged frog	<i>Rana draytonii</i>
Foothill yellow-legged frog	<i>Rana boylei</i>
Red-bellied newt	<i>Taricha rivularis</i>
<b>Reptiles</b>	
Western pond turtle	<i>Emys marmorata</i>
<b>Fish</b>	
Russian River tule perch	<i>Hysterocarpus traski pomo</i>
Steelhead – central California coast DPS	<i>Oncorhynchus mykiss irideus pop. 8</i>
Chinook salmon – California coastal ESU	<i>Oncorhynchus tshawytscha pop. 17</i>
<b>Plants</b>	
Burke's goldfields	<i>Lasthenia burkei</i>
Contra Costa goldfields	<i>Lasthenia conjugens</i>
Showy Indian clover	<i>Trifolium amoenum</i>
Raiche's manzanita	<i>Arctostaphylos stanfordiana ssp. raichei</i>
California lady's-slipper	<i>Cypripedium californicum</i>
Mountain lady's-slipper	<i>Cypripedium montanum</i>
Toren's grimmia	<i>Grimmia torenii</i>
Mendocino bush-mallow	<i>Malacothamnus mendocinensis</i>
North Coast semaphore grass	<i>Pleuropogon hooverianus</i>
Bristly leptosiphon	<i>Leptosiphon acicularis</i>

Source: USFWS, 2018, CDFW, 2018, and CNPS, 2018.

IV.a) As described above, the analysis contained in this Initial Study assumes grading on the majority of the Site has already occurred, involving the placement of 51,818 acres of fill on-site to create a finished grade pad one foot above flood elevations, construction of a vegetated v-ditch and drainage swales on-site, removal of the Site's existing vegetation, including the cottonwood saplings in the southwestern portion of the Site, and the area disturbed under grading hydroseeded. Additionally, per the grading plans, in order to protect the existing cottonwood trees along the western boundary of the Site, grading on-site observed a 5-foot setback from the drip line of the trees.

Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently

located on a parcel north of Ukiah, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transport materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. As shown in Table 3 above, there are 24 special status plant and wildlife species with the potential to occur on or within the vicinity of the Site. The existing cottonwood trees located on-site may provide potential habitat for special status species. However, based on the prior agricultural use of the Site, surrounding industrial uses, and recently completed on-site grading, there is limited potential for any special status plant or wildlife species to be present at the Site. In order to reduce potential impacts associated with habitat modifications as a result of the proposed project, existing trees on-site shall be retained to the greatest extent feasible, except on advice of a qualified professional, as required per Mitigation Measure BIO-1. With mitigation incorporated, a less than significant impact would occur.

IV.b) The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No riparian habitat is mapped on-site or within the vicinity (NWI, 2018), and no other sensitive natural communities are located on or adjacent to the Site. No impact would occur.

IV.c) As provided by the USFWS National Wetlands Inventory (NWI) wetland mapper, the Site does not contain any wetland areas, although 13 wetland areas are mapped within one-half mile (2,640 feet) of the Site, including:

- An approximately 1.61 acre riverine wetland, classified as intermittent and streambed seasonally flooded (R4SBC), located approximately 400 feet (0.08 miles) northeast of the Site;
- An approximately 35.14 acre lake wetland, classified as lacustrine, limnetic, unconsolidated bottom, and artificially flooded (L1UBK), located approximately 430 feet (0.08 miles) northeast of the Site;
- An approximately 5.68 acre freshwater forested/shrub wetland, classified as palustrine, forested, and seasonally flooded (PFOC), located approximately 1,215 feet (0.23 miles) east of the Site;
- An approximately 95.67 riverine wetland, classified as riverine, lower perennial, unconsolidated bottom, and permanently flooded (R2UBH), located approximately 1,230 feet (0.23 miles) east of the Site;
- An approximately 0.39 acre riverine wetland, classified as riverine, lower perennial, unconsolidated shore, and seasonally flooded (R2USC), located approximately 1,315 feet (0.25 miles) east of the Site;
- An approximately 0.61 acre freshwater forested/shrub wetland, classified as palustrine, forested, and seasonally flooded (PFOC), located approximately 1,320 feet (0.25 miles) southeast of the Site;
- An approximately 0.34 acre riverine wetland, classified as riverine, lower perennial, unconsolidated shore, and seasonally flooded (R2USC), located approximately 1,900 feet (0.36 miles) southeast of the Site;
- An approximately 1.57 acre riverine wetland, classified as riverine, intermittent, streambed, and seasonally flooded (R4SBC), located approximately 2,030 feet (0.38 miles) west of the Site;
- An approximately 1.68 acre freshwater emergent wetland, classified as palustrine, emergent, persistent, and seasonally flooded (PEM1C), located approximately 2,170 feet (0.41 miles) east of the Site;
- An approximately 1.02 acre riverine wetland, classified as riverine, lower perennial, unconsolidated shore, and seasonally flooded (R2USC), located approximately 2,175 feet (0.41 miles) southeast of the Site;



- An approximately 0.60 acre freshwater forested/shrub wetland, classified as palustrine, forested, and seasonally flooded (PFOC), located approximately 2,220 feet (0.42 miles) southeast of the Site;
- An approximately 1.96 acre freshwater forested/shrub wetland, classified as palustrine, forested, and temporary flooded (PFOA), located approximately 2,275 feet (0.43 miles) northwest of the Site; and
- An approximately 0.31 riverine wetland, classified as riverine, intermittent, streambed, and seasonally flooded (R4SBC), located approximately 2,415 feet (0.46 miles) northeast of the Site.

As previously discussed, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transport materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad.

In order to ensure protection of wetland areas within the vicinity of the Site, any future development proposed at the Site, including the potential future development of a clear span structure located on top of a concrete pad, would be required, pursuant to Mitigation Measure BIO-2, to implement standard Best Management Practices (BMPs) to such as straw bales, fiber rolls, and/or silt fencing structures to assure the minimization of erosion resulting from construction and to avoid runoff into sensitive habitat areas, limit ground disturbance to the minimum necessary, and stabilize disturbed soil areas as soon as feasible after construction is completed. With mitigation incorporated, a less than significant impact would occur.

IV.d) The project would not be anticipated to substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The Site does not contain any streams, creeks, or wetland areas. As previously discussed, a row of existing mature cottonwood trees is located along the Site's western boundary, which may provide habitat for wildlife species. As required per Mitigation Measure BIO-1, existing trees on-site shall be retained to the greatest extent feasible, except on advice of a qualified professional. With mitigation incorporated, a less than significant impact would occur.

IV.e) The proposed project would not conflict with any local policies or ordinances protecting biological resources. Though the Site is located within unincorporated Mendocino County, the Site is under the jurisdiction of the Ukiah Valley Area Plan (UVAP), which focuses on issues and elements of important to the future growth and development of the Ukiah Valley. If a policy or implementing action is in conflict with the County General Plan, the policy or implementing action from the UVAP shall take precedence over the County General Plan. Section 9, Open Space and Conservation, of the UVAP contains goals, policies, and implementation measures pertaining to the preservation of biological resources and sensitive habitats within the Ukiah Valley, including, but not limited to, the Russian River and oak woodlands. The Site is located approximately 1,110 feet west of the Russian River and contains a row of existing mature cottonwood trees along the Site's western boundary.

As described above, the analysis contained in this Initial Study assumes post-grading conditions, since grading will be required to comply with the conditions of the grading permit itself, which includes requirements, such as the incorporation of BMPs, to ensure potential impacts associated with the grading are minimized. Although the UVAP does not contain any specific policies related to the protection, removal, or replacement of cottonwood trees, on-site grading, currently underway, would result in the removal of the existing on-site vegetation, including the cottonwood saplings located in the southwestern

portion of the Site, while the existing row of cottonwood trees along the Site's western boundary would remain undisturbed. As such, the project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance and no impact would occur.

IV.f) There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans that apply to the site. No impact would occur.

#### MITIGATION MEASURES:

**BIO-1:** Existing trees located on the Site shall be preserved to the greatest extent feasible, except on advice of a qualified professional.

**BIO-2:** During any future development at the Site, the Applicant shall implement standard Best Management Practices (BMPs) to such as straw bales, fiber rolls, and/or silt fencing structures to assure the minimization of erosion resulting from construction and to avoid runoff into sensitive habitat areas, limit ground disturbance to the minimum necessary, and stabilize disturbed soil areas as soon as feasible after construction is completed.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact with Mitigation Incorporated** on Biological Resources.

<b>V. CULTURAL RESOURCES.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Thresholds of Significance:** The project would have a significant effect on cultural resources if it would cause a substantial adverse change in the significance of a historical resource as defined in §15064.5; cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5; or disturb any human remains, including those interred outside of formal cemeteries.

**DISCUSSION:** On June 13, 2018, LACO Associates (LACO), on behalf of the Applicant, prepared and delivered a Records Search Summary Request to the Northwest Information Center (NWIC), pursuant to the County's Memorandum of Understanding (MOU) with NWIC, to evaluate the potential to encounter archaeological or historic resources at the Site. Additionally, on June 13, 2018, LACO submitted a Native American tribal consultation request list and a Sacred Lands File (SLF) search request to the Native American Heritage Commission (NAHC), in order to confirm the local tribal contacts and whether any known cultural resources are located on-site.

**NAHC Response Letter:** A letter response received from NAHC, dated June 18, 2018, was received by LACO by e-mail on June 22, 2018. The NAHC letter indicates that a Sacred Lands File (SLF) search, completed by NAHC, had negative results, and included a contact list of 13 tribal contacts that may have knowledge of tribal cultural resources within the project area. On June 25, 2018, LACO sent courtesy letters to the 13 tribal contacts to request early consultation and input regarding any specific areas within the Area of Potential Effect (APE) which may be likely to harbor culturally valuable resources and may therefore merit additional protection or require a cultural monitor to be on-site during site preparation and grading. As of the date of this Initial Study, no responses from any of the 13 tribal contacts have been received.

**NWIC Records Search Summary:** A Records Search Summary Results letter was received from NWIC on July 3, 2018, which presented the results of the records search conducted by NWIC, which entailed reviewing pertinent NWIC base maps that reference cultural resources records and reports, historic-period maps and literature for Mendocino County. As described in NWIC's letter, one prior cultural study (Green 2013, S-46352), conducted in 2013, covered approximately 5 percent of the Site. No archaeological resources have previously been recorded at the Site. Additionally, per the State Office of Historic Preservation's Historic Property Directory, which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and the National Register of Historic Places, there are no recorded buildings or structures within or adjacent to the proposed project area. Furthermore, the NWIC base maps showed no previously recorded buildings or structures within the project area. Since review of historical literature and maps gave no indication of the potential for historic-period activity within the project area, there is a low potential for unrecorded historic-period archaeological resources at the Site. Further, since the 1958 USGS Ukiah 15-minute topographic quadrangle failed to depict any buildings or structures within the project area, there is a low possibility of identifying buildings or structures 45 years or older at the Site.

Based on an evaluation of the environmental setting and features associated within known sites, Native American resources in this part of Mendocino County have been found in areas populated by oak and buckeye, as well as near a variety of plant and animal resources. Sites are also found near watercourses and bodies of water. The Site is located in flat area approximately ¼-mile from the Russian River. The project area is also in proximity to hilly, wooded area and several other watercourses. Given the similarity of one or more of these environmental factors, there is a moderate potential for unrecorded Native American resources at the Site.

Since there is a moderate potential of identifying Native American archaeological resources in the project area, NWIC recommends that a qualified archaeologist conduct further archival and field study to identify cultural resources and provides specific recommendations in case any archaeological resources are encountered during construction at the Site. However, since the proposed project does not propose any ground disturbance or construction at this time, it is assumed that NWIC's recommendations would apply to any future development proposed at the Site, including the concrete pad and clear span structure that may be developed on-site in the future.

**Tribal Consultation:** On August 8, 2018, formal tribal consultation was initiated by the County of Mendocino, in accordance with Assembly Bill 52, to request consultation and input regarding any specific areas within the Area of Potential Effect (APE) which may be likely to harbor culturally valuable resources and may therefore merit additional protection or require a cultural monitor to be on-site during the project or future

Site development. A letter, dated September 10, 2018 indicated a previous study (Study #46352)<sup>1</sup> found no cultural resources on the portion of the site surveyed and recommended no further cultural resources need be sought. However, the site location indicates a moderate potential for archeological or historical building resources. Therefore, the Applicant is pursuing additional surveying of the remaining portions of the site and the adjacent existing former agricultural buildings. No responses from Tribal consultants were received.

The NAHC and NWIC response letters are included in Appendix C of this Initial Study.

V.a) No existing development is present on the Site. Therefore, there would be no impact to a historical resource as a result of the proposed project.

V.b-c) The analysis contained in this Initial Study assumes completion of the grading proposed on the majority of the Site. Therefore, under the analysis, it is assumed the Site has received 51,818 cubic yards of fill, which has been distributed across the Site to create a finished grade pad one foot above flood elevations, the vegetated v-ditch and drainage swales have been constructed on-site, existing on-site vegetation, including the cottonwood saplings in the southwestern portion of the Site, have been removed, and the area disturbed under grading has been hydroseeded.

Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transport materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. The following Standard Condition advises the Applicants of the "Discovery Clause" of Mendocino County, which establishes procedures to follow in the event that archaeological or cultural materials are unearthed during future ground disturbing or construction activities.

**Standard Condition:** If any archaeological sites or artifacts are discovered during site excavation or construction activities, the Applicant shall cease and desist from all further excavation and disturbances within 100 feet of the discovery, and make notification of the discovery to the Director of the Department of Planning and Building Services. The Director will coordinate further actions for the protection of the archaeological resource(s) in accordance with Section 22.12.090 of the Mendocino County Code.

Additionally, in the event that future development is proposed on-site in the future, NWIC recommends that a qualified archaeologist conduct further archival and field study to identify cultural resources, and notes in the letter dated July 3, 2018, that field study may include, but is not limited to, hand auger sampling, shovel test units, or geoarchaeological analyses as well as other common methods used to identify the presence of archaeological resources, and if any cultural resources are identified, that they be recorded on DPR 523 historic resource recordation forms. Specific requirements would be discussed upon submittal of a development proposal to the County.

---

<sup>1</sup> Green, 2013, Northwest Information Center Letter dated 9/10/18

With the inclusion of the recommended conditions of approval, the project is found consistent with Mendocino County policies for protection of archaeological or cultural resources. A less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Cultural Resources.

VI. ENERGY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Thresholds of Significance:** The project would have a significant effect on energy if it would result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation; or require or result in the construction of new water or wastewater facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

**DISCUSSION:** On October 7, 2015, Governor Edmund G. Brown, Jr. signed into law Senate Bill (SB) 350, known as the Clean Energy and Pollution Reduction Act of 2015 (De León, Chapter 547, Statutes of 2015), which sets ambitious annual targets for energy efficiency and renewable electricity aimed at reducing greenhouse gas (GHG) emissions. SB 350 requires the California Energy Commission to establish annual energy efficiency targets that will achieve a cumulative doubling of statewide energy efficiency savings and demand reductions in electricity and natural gas final end uses by January 1, 2030. This mandate is one of the primary measures to help the state achieve its long-term climate goal of reducing GHG emissions to 40 percent below 1990 levels by 2030. The proposed SB 350 doubling target for electricity increases from 7,286 gigawatt hours (GWh) in 2015 up to 82,870 GWh in 2029. For natural gas, the proposed SB 350 doubling target increases from 42 million of therms (MM) in 2015 up to 1,174 MM in 2029 (CEC, 2017).

Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transport materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. Any development which may occur at the Site in the future would be subject to Part 6 (California Energy Code) of Title 24 of the California Code of Regulations, which contains energy conservation standards applicable to residential and non-residential buildings throughout California.

XIX.a-b) The proposed project would not be anticipated to result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy or wasteful use of energy resources, nor would the proposed project conflict with or obstruct a state or local plan for renewable



energy or energy efficiency. As discussed above the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad.

Any development to occur at the Site in the future would be subject to Part 6 (California Energy Code) of Title 24 of the California Code of Regulations, which contains energy conservation standards applicable to residential and non-residential buildings throughout California to ensure new and existing buildings achieve energy efficiency and preserve outdoor and indoor environmental quality. A less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Energy.

<b>VII. GEOLOGY AND SOILS. Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Thresholds of Significance:** The project would have a significant effect on geology and soils if it would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides; result in substantial soil erosion or the loss of topsoil; be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse; be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property; have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

**DISCUSSION:** Chapter 3 (Development Element) of the Mendocino County General Plan discusses the seismic hazards of the area. Mendocino County is located just south of the Cascadia Subduction Zone and will likely be subjected to a strong earthquake in the foreseeable future. A number of faults are located throughout the County, including the San Andreas Fault in the southwest corner of the County, the Maacama Fault in the inland valley from Sonoma County to Laytonville, the Round Valley Fault in the northeastern part of the County, and the Etsel Ridge Fault in the eastern portion of the County (General Plan, 2009). The Site is not located within an Earthquake Fault Zone. The nearest active fault to the project Site is the Maacama Fault Zone, located approximately 2 miles east of the Site (PBS – Earthquake, n.d.).

Any structure built in Mendocino County would likely be subjected to seismic activity during its expected lifespan. Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. In the event that development is proposed on-site in the future, it would be subject to the latest version of the California Building Code (CBC), to reduce any potential geological risks.

Soils underlying the project Site are classified as:

- Cole loam, drained, 0 to 2 percent slopes, MLRA 14 (#113, underlying approximately 95 percent of the Site) – comprised of loam and clay loam, somewhat poorly drained soil with more than 80 inches to water table, with high available water storage (more than 10.8 inches); and
- Urban Land (#210, underlying approximately 5 percent of the Site, along the Site's western and northeastern boundaries) – no specific details on this soil type is provided (USDA, 2017).

The Cole loam soil unit (#113), underlying the majority of the Site, is not classified as a hydric soil. [As defined under Section IV, Biological Resources, above, hydric soils are one indicator of wetlands.] Additionally, this soil unit is subject to high runoff and only rarely floods or ponds (USDA, 2017).

VII.a.i-ii) The Site is located within a seismically active region and, as a result, it is expected that the project area would experience ground shaking of some magnitude during the economic life span of any Site development. However, the Site is not located within an Earthquake Fault Zone and the nearest active fault to the project Site is the Maacama Fault Zone, located approximately 2 miles east of the Site (PBS –

Earthquake, n.d.). Since any future development proposed on-site would be subject to the latest version of the CBC to reduce any potential geological risks, a less than significant impact would occur.

VII.a.iii) The Site is not located within a mapped liquefaction zone, or in an area with the potential for liquefaction to occur (CalOES, 2015). Since any future development proposed on-site would be subject to the latest version of the CBC to reduce any potential geological risks, a less than significant impact would occur.

VII.a.iv) Although a historic landslide has been mapped approximately 3,000 feet west of the Site (DOC, 2015), in the mountainous area west of the Site. Landslides are not known to occur in the immediate vicinity of the Site, which is relatively flat in nature. Since any future development proposed on-site would be subject to the latest version of the CBC to reduce any potential geological risks, a less than significant impact would occur.

VII.b) The proposed project would not be anticipated to result in substantial soil erosion or the loss of topsoil. Any future development proposed on-site would be required, pursuant to Mitigation Measure BIO-2, to implement standard Best Management Practices (BMPs) to such as straw bales, fiber rolls, and/or silt fencing structures to assure the minimization of erosion resulting from construction and to avoid runoff into sensitive habitat areas, limit ground disturbance to the minimum necessary, and stabilize disturbed soil areas as soon as feasible after construction is completed. With mitigation incorporated, a less than significant impact would occur.

VII.c) As discussed above, the Site is located in a seismically active area; however, the Site is not located within an Earthquake Fault Zone and the nearest active fault to the project Site is the Maacama Fault Zone, located approximately 2 miles east of the Site (PBS – Earthquake, n.d.). The Site is not located within a mapped liquefaction zone, or an area with the potential for liquefaction to occur (CalOES, 2015). Although a historic landslide has been mapped approximately 3,000 feet west of the Site (DOC, 2015), in the mountainous area west of the Site. Landslides are not known to occur in the immediate vicinity of the Site, which is relatively flat in nature. Since any future development proposed on-site would be subject to the latest version of the CBC to reduce any potential geological risks, a less than significant impact would occur.

VII.d) Expansive soils generally comprise cohesive, fine-grained clay soils and represent a significant structural hazard to buildings founded on them, especially where seasonal fluctuations in soil moisture occur at the foundation-bearing depth and can drastically expand and shrink in volume with moisture changes. The subsurface soils at the site are loam and clay loam, which may be subject to expansion and contraction. However, any future development proposed at the Site would be designed to ensure foundation(s) would adequate support any proposed structure(s) and, as a result, a less than significant impact would occur.

VII.e) The project would not require installation and use of a septic tank or alternative wastewater disposal system, since no development is proposed under the project. As such, no impact would occur.

VII.f) As previously discussed, this analysis assumes completion of the grading activities on-site, including placement of 51,818 cubic yards of fill to create a finished grade pad one foot above flood elevations, construction of the vegetated v-ditch and drainage swales, removal of on-site vegetation, including the cottonwood saplings in the southwestern portion of the Site, and hydroseeding the area disturbed under grading.

There is the possibility that unique paleontological resources or sites or unique geologic features could be encountered during future ground disturbing activities or development of the Site. However, with incorporation of Mitigation Measure GEO-1 below, which provides specific requirements in the event any fossils or fossil-bearing deposits are encountered during future development at the Site, a less than significant impact would occur.

**MITIGATION MEASURES:** Refer to Mitigation Measure BIO-2 under Section IV, Biological Resources, above.

**GEO-1:** In the event that fossils or fossil-bearing deposits are discovered during Site preparation and grading activities, or during future development at the Site, the contractor shall notify a qualified paleontologist to examine the discovery and all project activities within 50 feet of the find shall be temporarily halted. The area of discovery shall be protected to ensure that fossils are not removed, handled, altered, or damaged until the Site is properly evaluated and further action is determined. The paleontologist shall document the discovery as needed, in accordance with Society of Vertebrate Paleontology standards (Society of Vertebrate Paleontology 1995), evaluate the potential resource, and assess the significance of the finding under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important. The plan shall be submitted to the County of Mendocino for review and approval prior to implementation.

#### FINDINGS:

The proposed project would have a **Less Than Significant Impact with Mitigation Incorporated** on Geology and Soils.

VIII. GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions (GHG), either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Thresholds of Significance:** The project would have a significant effect on greenhouse gas emissions if it would generate greenhouse gas emissions (GHG), either directly or indirectly, that may have a significant impact on the environment; or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

**DISCUSSION:** The project Site is located within the North Coast Air Basin (NCAB) and is subject to the requirements of the Mendocino County Air Quality Management District (MCAQMD). The MCAQMD is responsible for monitoring and enforcing federal, state, and local air quality standards in the County of Mendocino.

The Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, is a State law that establishes a comprehensive program to reduce greenhouse gas (GHG) emissions from all sources throughout the State. AB 32 requires the State to reduce its total GHG emissions to 1990 levels by 2020, a reduction of approximately 15 percent below emissions expected under a “business as usual” scenario. Pursuant to AB 32, the California Air Resources Board (ARB) must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. The following major GHGs and groups of GHGs being emitted into the atmosphere are included under AB 32: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>) (ARB, 2014). Assembly Bill (AB) 1803, which became law in 2006, made ARB responsible to prepare, adopt, and update California’s GHG inventory. The 2020 GHG emissions limit statewide, equal to the 1990 level, is 431 million metric tonnes of carbon dioxide equivalent (MMTCO<sub>2</sub>e) (ARB, 2017). Pursuant to Executive Order S-3-05, California has a reduction target to reduce GHG emissions to 80 percent below 1990 levels (ARB, 2014).

The California Environmental Protection Agency (CalEPA), in its 2017 *Edition California GHG Emission Inventory* (California GHG Emission Inventory), dated June 6, 2017, states that GHG emissions within the state of California have followed a declining trend since 2007. In 2015, statewide GHG emissions were 1.5 MMTCO<sub>2</sub>e lower than 2014 levels. The transportation section remains the largest source of GHG emissions in the state, accounting for 37 percent of the state’s GHG emissions. Emissions from transportation sources were relatively constant through 2007, declined through 2013, then increased by 4.6 MMTCO<sub>2</sub>e (or 3 percent) from 2014 to 2015. For 2015, California’s total GHG emissions were estimated to be approximately 440.4 MMTCO<sub>2</sub>e (CalEPA, 2017).

The California Emissions Estimator Model (CalEEMod) was utilized to quantify potential criteria pollution and GHG emissions associated with both Site preparation and grading, in addition to operation of the processing equipment to be relocated to the Site from a parcel located north of the City of Ukiah. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Further, the model identifies mitigation measures to reduce criteria pollutants and GHG emissions along with calculating the benefits achieved from measures chosen by the user (CalEEMOD). The results of the CalEEMod analysis in their entirety are included in Appendix B.

Processing activities (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) are proposed to be relocated to the Site from a parcel north of Ukiah, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. As a result, emissions in the vicinity of the project Site would be anticipated to increase. According to the CalEEMod results for the proposed project and as shown in Table 4, below, construction activities (both unmitigated and mitigated), including site preparation (relocation of uses to the Site) would result in approximately 8.94 MTCO<sub>2</sub>e over the anticipated one-week construction period (assuming 5 work days per week), and the project’s operational emissions (both unmitigated and mitigated) of CO<sub>2</sub> equivalent gasses would be approximately 270.53 MMTCO<sub>2</sub>e per year. It is anticipated that off-road emissions would account for 100 percent of the proposed project’s total anticipated operational emissions. Compared to the emission amounts provided in the California GHG Emission Inventory, construction and operation of the proposed project would account for approximately 0.000002 and 0.00006 percent of the State’s total GHG emissions recorded in 2015, respectively.

Table 4: Construction, Operational, and Mobile Greenhouse Gas Emissions of the Proposed Project

Emission Category	CO <sub>2</sub> e Emissions (Metric tons/year)
Construction <sup>1</sup>	8.94 <sup>2</sup>
Operational	270.53
Excluding Off-Road Sources	0
Off-Road	270.53

Notes:

CO<sub>2</sub>e= Carbon Dioxide Equivalents

<sup>1</sup>= Analysis assumes a one-week construction period, beginning on March 4<sup>th</sup> and ending on March 8, 2019. Once construction activities, including site preparation, are completed, construction emissions would cease at the Site and only operational emissions would be anticipated at the Site.

<sup>2</sup>= During the CalEEMod analysis, both mitigated and unmitigated construction and operational emissions were calculated to be the same.

Source: CalEEMod Model Results, July 19, 2018, Appendix B.

VIII.a) A significant amount of GHG emissions is not anticipated under the proposed project. As noted above, Site preparation and grading activities, in addition to operation of the processing equipment at the Site would result in approximately 8.94 and 270.53 MTCO<sub>2</sub>e per year, which would account for less than one percent of the State's total GHG emissions recorded in 2015. As discussed under Section III, Air Quality, above, the proposed project would result in the relocation of an existing use, including processing activities and associated equipment, to the Site in order to centralize operations, which would be anticipated to result in increased GHG emissions in the vicinity of the Site. However, emissions associated with the existing use are already observed in the region and with relocation of the existing use, the need to transport materials to the parcel north of Ukiah, where the existing use is currently located, would be eliminated, thereby reducing vehicular emissions.

As described in Section III, Air Quality, above, two mitigation measures (Mitigation Measures AIR-1 and AIR-2) are required in order to reduce potential air quality impacts associated with the project, including requiring compliance with MCAQMD standards and regulations and maintaining all construction equipment in good working condition. With incorporation of Mitigation Measures AIR-1 and AIR-2, potential GHG emissions associated with the proposed project would be reduced, and a less than significant impact would occur.

VIII.b) The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As noted in Section 7, Energy and Air Quality, of the UVAP, Policy EA1.1k requires the County to "prepare and adopt a qualified Greenhouse Gas Reduction and Energy Management Plan that establishes a baseline inventory of GHG emissions from all sources, GHG reduction targets that are consistent with the goals of AB32, and enforceable GHG emission reduction strategies and performance measures."

Since the County has not yet prepared and adopted this Plan and since a significant amount of GHG emissions is not anticipated under the project, as described above, the proposed project would not conflict with local, MCAQMD, State, or federal regulations pertaining to GHG emissions. A less than significant impact would occur.

**MITIGATION MEASURES:** Refer to Mitigation Measures AIR-1 and AIR-2 under Section III, Air Quality, above.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact with Mitigation Incorporated** on Greenhouse Gas Emissions.

<b>IX. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Thresholds of Significance:** The project would have a significant effect on hazards and hazardous materials if it were to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment; result in a safety hazard or excessive noise for people residing or working in the project area if located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport; or impair the implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan; or expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

**DISCUSSION:** A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or has characteristics defined as hazardous by a federal, state, or local agency. Chemical and physical properties such as toxicity, ignitability, corrosiveness, and reactivity cause

a substance to be considered hazardous. These properties are defined in the California Code of Regulations (CCR), Title 22, §66261.20-66261.24. A “hazardous waste” includes any hazardous material that is discarded, abandoned, or will be recycled. Therefore, the criteria that render a material hazardous also cause a waste to be classified as hazardous (California Health and Safety Code, §25117).

The 10 acre Site is vacant and undeveloped. The Site was formerly utilized for agricultural use (orchard) and contains a row of existing mature cottonwood trees located along the Site’s western boundary. The analysis contained in this Initial Study assumes completion of the grading activities on-site, including placement of 51,818 cubic yards of fill to create a finished grade pad one foot above flood elevations, construction of the vegetated v-ditch and drainage swales, removal of on-site vegetation, including the cottonwood saplings in the southwestern portion of the Site, and hydroseeding the area disturbed during grading. Additional drainage ditches are located just north and east of the project Site, flowing west to east and northwest to southeast, respectively. The Site is located approximately 1,110 feet west of the Russian River.

Under the proposed project, the Applicant proposes to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the transfer of materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. The proposed industrial use would require the routine transport, use, and disposal of hazardous materials including, but not limited to, fuel, cleaning solvents, and lubricants associated with the use and maintenance of the processing equipment and heavy equipment (trucks, loaders, etc.) associated with loading and moving the material.

The project Site does not include any known hazardous waste sites, as mapped by the State Water Resources Quality Control Board (SWRQCB) or the California Department of Toxic Substances Control (DTSC). As provided on the SWRQCB’s GeoTracker and DTSC’s EnviroStor database, 3 listed sites are located within one half mile of the project Site, including the following, as provided in Table 5 below.

Table 5: GeoTracker- and EnviroStor-Listed Hazardous Materials Sites within Close Proximity to Site

ID	Name & Case No.	Case/Site Type	Location	Distance & Direction to Site	Cleanup Status
<b>GeoTracker</b>					
1	Coast Wood Preserving, Inc. [RB Case #: 1NMC086]	Cleanup Program Site	3150 Taylor Drive	600 feet NW of Site	Open – Remediation
2	Mendocino Transit Authority [RB Case #: 1TMC432]	LUST Cleanup Site	241 Plant Road	840 feet N of Site	Completed – Case Closed
<b>EnviroStor</b>					
1	Coast Wood Preserving [Case #: 23240013]	Federal Superfund	Plant Road and Taylor Drive	600 feet NW of Site	Certified/Operation & Maintenance
LUST = Leaking Underground Storage Tank Source: SWRCQB – Geotracker, 2015, and DTSC, 2018.					

IX.a-b) The proposed project would require the routine transport, use, or disposal of hazardous materials associated with the use and maintenance of processing equipment and heavy equipment associated with the proposed processing activities on-site, such as gasoline, diesel fuel, hydraulic fluids, oils, lubricants, and



cleaning solvents. However, the types and quantities of hazardous materials to be used are not expected to pose a significant risk to the public and/or environment and would be managed in accordance with federal, state, and local regulations. Since the transport, use, and storage of any hazardous materials at the Site would be required to be conducted in accordance with all federal, state, and local regulations, a less than significant impact would occur.

IX.c) The nearest school to the Site is the Ukiah Junior Academy, located approximately 1,675 feet (0.32 miles) west of the Site, across Highway 101. Since no schools are located within one-quarter mile of the Site, no impact would occur.

IX.d) The Site has been checked against the lists of hazardous materials sites maintained by the State of California. Although two known hazardous materials sites are known to be located within the vicinity of the Site, as shown in Table 5, above, approximately 600 feet northwest and 840 feet north, respectively, the Site is not included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5. No impact would occur.

IX.e) The Site is located approximately 4,000 feet (0.76 miles) southwest of the Ukiah Municipal Airport. Per the *Mendocino County Airport Comprehensive Land Use Plan*, the Site is located within Zone B2 of the Ukiah Municipal Airport, the “Extended Approach/Departure Zone”, which is associated with moderate risk (aircraft commonly below 800 feet above ground level) and significant noise, is limited to residential parcels of 2 acres or large, requires less than 60 people per acre, and recommends 30 percent open land. This Zone allows for low intensity manufacturing on-site, which is similar to the intended use at the Site (County – Airport, 1996). Additionally, the very northern portion of the Site is located within the Ukiah Municipal Airport’s project noise contour of 55 A-weighted decibels (dBA) (General Plan, 2009).

Following approval of the GPA/ZR, processing equipment and materials are proposed to be relocated to the Site from a parcel located north of Ukiah in order to centralize ongoing C&S Waste operations. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. The Site is already located within a high noise area along the Highway 101 corridor and is surrounded by existing industrial uses, similar to the use proposed under the project. Since the proposed project would be consistent with the Zone’s allowable uses, would comply with the development and density requirements, and no people would reside on-site, a less than significant impact would occur.

IX.f) There are no emergency response plans or evacuation plans that apply to the Site. No impact would occur.

IX.g) The proposed project would not expose people or structures, either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires. The Site’s fire hazard severity is not classified (CalFire, 2012); however, since no development, including construction of residences, is proposed at the Site, the Site is primarily surrounded by industrial and agricultural uses, and the Site is not forested or located adjacent to forestland, a less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Hazards or Hazardous Materials.

<b>X. HYDROLOGY AND WATER QUALITY.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Thresholds of Significance:** The project would have a significant effect on hydrology and water quality if it would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality; substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin; substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flows; in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

**DISCUSSION:** The topography of the Site is relatively flat, sloping gently to the east. No existing development is located on-site, nor is development of any structures proposed at the Site. As shown on Federal Emergency Management Agency's (FEMA) map number 06045C1677F, effective June 2, 2011, the Site is partially located within a 100-year FEMA flood zone. However, the analysis contained in this Initial Study assumes the completion of on-site grading activities, which includes the placement of 51,818 acres of fill on-site to create a finished grade pad one foot above flood elevations, construction of a vegetated v-ditch and drainage swales on-site, removal of the Site's existing vegetation, including the cottonwood

saplings in the southwestern portion of the Site, and hydroseeding of the area disturbed under grading. Additionally, per the grading plans, in order to protect the existing cottonwood trees along the western boundary of the Site, grading on-site observed a 5-foot setback from the drip line of the trees.

The project Site is located within the Ukiah Stormwater Zone (PBS – MS4, 2014) and, as such, is subject to storm water permitting and conformance with Section E.12 of the Phase II Small Municipal Separate Storm Sewer System (MS4) General Permit issued by the State Water Resources Control Board (SWRCB) (SWRCB Water Quality Order No. 2013-0001-DWQ, General Permit No. CAS000004; amended in 2015 under SWRCB Order WQ 2015-0133-EXEC (SWRCB - Order, 2015)). The Phase II Small MS4 General Permit requires local governing agencies, such as the County of Mendocino, to regulate storm water runoff from new developments or significant redevelopment projects in urban areas (County - Low, 2014). The project Site is under the jurisdiction of the North Coast Regional Water Quality Control Board (NCRWQCB), which exercises rulemaking and regulatory activities in Del Norte, Glenn, Humboldt, Lake, Marin, Mendocino, Modoc, Siskiyou, Sonoma, and Trinity counties. The NCRWQCB is responsible for enforcing the Phase II Small MS4 General Permit in the urban areas of Mendocino County. The County has prepared the *Low Impact Development Standards Manual* (LID Standards Manual), which provides guidance for the implementation of storm water quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigation potential water quality impacts from storm water and non-storm water discharges (County - Low, 2014).

The Site is currently vacant. Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel in north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad.

Since the proposed project would not create any impervious area on the Site at this time, the proposed project would not be subject to the requirements of Section E.12 of the Phase II Small MS4 General Permit. However, any future development on-site may require conformance with the requirements of Section E.12 of the Phase II Small MS4 General Permit if a certain amount of impervious area is proposed (at least 2,500 to 5,000 square feet, depending on project type), which would require certain design measures to reduce runoff (SWRCB – Order, 2015). Per the County's Guidelines for the Standard Urban Storm Water Mitigation Plan (SUSMP Guidelines), if more than one acre of impervious surface is proposed (County – Low, 2014), a Storm Water Mitigation Plan and Written Certification of BMPs must be prepared and submitted as part of the project approval process (County – Guidelines).

Though the proposed project would not be subject to the requirements of Section E.12 of the Phase II Small MS4 General Permit at this time, the proposed project and any future development on-site would be required to implement appropriate BMPs (see Mitigation Measure BIO-2), including the use of physical barriers such as silt fencing, straw matting, and fiber rolls, compacting the soil, and reseeding the Site after grading is complete, to prevent erosion of the Site and to prevent stormwater runoff from carrying pollutants from the Site to adjacent parcels. Under the proposed project, stormwater runoff will be directed to the southeast and towards the site's drainage swales. Since no impervious surface is proposed in the current phase of development, the majority of the anticipated stormwater will infiltrate into the ground.

X.a) As discussed above, the proposed project would not increase the amount of impervious surface at the Site at this time, and would therefore not be subject to the requirements of Section E.12 of the Phase II Small MS4 General Permit. Grading is proposed on the majority of the Site and is currently underway. Grading, in

addition to any future development proposed on-site, is currently and would be required to implement appropriate BMPs, per Mitigation Measure BIO-2, including the use of physical barriers such as silt fencing, straw matting, and fiber rolls, compacting the soil, and reseeding the Site after grading is complete, to prevent erosion of the Site and to prevent stormwater runoff from carrying pollutants from the Site to adjacent parcels. Additionally, as noted above, future development at the Site may require conformance with the requirements of Section E.12 of the Phase II Small MS4 General Permit if a certain amount of impervious area is proposed (at least 2,500 to 5,000 square feet, depending on project type), in addition to complying with the SUSMP Guidelines, if more than one acre of impervious surface is proposed.

The Site is located within the service districts of the Ukiah Valley Sanitation District (UVSD) and the Willow County Water District (WCWD). Because no development is proposed under the project at this time, connection to community water or wastewater systems, or installation of an on-site wastewater treatment system, are not proposed under the project and employees would utilize facilities at the adjacent properties owned by the Applicant. However, if and when future development is proposed at the Site that would require community water and sewer service, the respective providers (WCWD and UVSD) would be required to operate in compliance with all water quality standards and waste discharge requirements.

With implementation of Mitigation Measure BIO-2 and compliance with Section E.12 of the Phase II Small MS4 General Permit and the SUSMP Guidelines, if required, the proposed project would not violate any water quality standards or waste discharge requirements, and a less than significant impact would occur.

X.b) The proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, since, at this time, the project would not increase the amount of impervious surface at the Site. Although potential future development plans include a concrete pad and clear span structure that would be located on top of the pad, it is not anticipated that this potential development would substantially deplete groundwater supplies or interfere with groundwater recharge. Additionally, although the Site is within the service boundaries of WCWD, since the Site does not include any development at this time, the Site would not be required to connect and be served by community water. However, if and when future development is proposed at the Site that would require community water service, the capacity of the existing system would be analyzed. Due to the area's slow growth and development rate, it is anticipated that adequate capacity remains available to serve potential development at the Site. Any water necessary for processing activities and/or dust control would be brought to the Site as needed. Furthermore, any future development would increase the amount of impervious surfaces on-site, since the Site is currently vacant and undeveloped; however, at this time, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad, which would not be anticipated to significantly impact groundwater recharge. A less than significant impact would occur.

X.c.i-ii) The proposed project would not result in substantial erosion or siltation on- or off-site or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, since grading, currently underway at the Site, will result in the construction of a vegetative V-ditch within the western portion of the Site and vegetated drainage swales within the eastern and southern portions of the Site. Existing drainages are also located along the Site's northern and eastern boundaries. Although any development at the Site would increase the amount of impervious surface at the Site, runoff from the Site would be directed to the above-listed drainages, which would reduce the potential for flooding on- or off-site. Additionally, the current grading activities and any future development on-site would be required to implement appropriate BMPs (see Mitigation Measure BIO-2), including the use of physical barriers such as silt fencing, straw matting, and fiber rolls, compacting the soil, and reseeding the Site after grading is

complete, to prevent erosion of the Site and to prevent stormwater runoff from carrying pollutants from the Site to adjacent parcels. With mitigation incorporated, a less than significant impact would occur.

X.c.iii) Stormwater at the Site will be directed to the south and towards the Site's drainage swales. Grading, currently underway at the Site, will also result in the construction of a vegetative V-ditch within the western portion of the Site and vegetated drainage swales within the eastern and southern portions of the Site. These drainages would ensure polluted runoff is minimized and that the Site would not result in runoff that would exceed the capacity of existing or planned stormwater drainage systems. A less than significant impact would occur.

X.c.iv) Although the Site is currently partially located within a 100-year FEMA flood zone, grading, currently underway, at the Site will result in the placement of 51,818 acres of fill on-site to create a finished grade pad one foot above flood elevations. Additionally, the existing drainages along the Site's northern and eastern boundaries will continue to be utilized for drainage, in addition to the new vegetative V-ditch within the western portion of the Site and vegetated drainage swales within the eastern and southern portions of the Site. As a result, the Site would not impede or redirect flood flows and a less than significant impact would occur.

X.d) Due to the Site's location, the Site is not located within a tsunami hazard or seiche zone. While the Site is currently partially located within a 100-year FEMA flood zone, grading, currently underway, at the Site will result in the placement of 51,818 acres of fill on-site to create a finished grade pad one foot above flood elevations. As a result, no impact would occur.

X.e) The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, as there are no such plans applicable to the Site. No impact would occur.

**MITIGATION MEASURES:** Refer to Mitigation Measure BIO-2 under Section IV, Biological Resources, above.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact with Mitigation Incorporated** on Hydrology and Water Quality.

<b>XI. LAND USE AND PLANNING.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**THRESHOLDS OF SIGNIFICANCE:** The project would have a significant effect on land use and planning if it would physically divide an established community or cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

**DISCUSSION:** Though the Site is located within unincorporated Mendocino County, the Site is under the jurisdiction of the Ukiah Valley Area Plan (UVAP), which focuses on issues and elements of importance to

the future growth and development of the Ukiah Valley. If a policy or implementing action is in conflict with the County General Plan, the policy or implementing action from the UVAP shall take precedence over the County General Plan.

The Site has a current land use designation of Agricultural (AG:FP[AZ]) under the UVAP and is zoned as Agricultural Lands, 40 acre minimum parcel size (AG-40:FP[AZ]) under the County of Mendocino Zoning Code (see Figures 4 and 5). A general plan amendment and zone reclassification are proposed to change the existing land use and zoning designations for the approximately 10 acre Site to Industrial (I:FP[AZ]) and Inland General Industrial (I-2:FP[AZ]), respectively, to allow future industrial uses on the Site to be principally permitted.

XI.a-b) The proposed project would not physically divide an established community or cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The project involves a general plan amendment and zone reclassification, and the proposed general plan and zoning designations are consistent with the surrounding designations. Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. Since the proposed project and anticipated future development would be consistent and compatible with surrounding uses and the requested land use and zoning designations are consistent with surrounding designations, a less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Land Use and Planning.

<b>XII. MINERAL RESOURCES.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**THRESHOLDS OF SIGNIFICANCE:** The project would have a significant effect on mineral resources if it would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

**DISCUSSION:** As noted in Section 9 (Open Space and Conservation) of the UVAP, natural occurring minerals in the UVAP planning area have or could have economic value to the local economy and the owners of the mineral rights. The most frequently mined products are sand, gravel, and stone, which are used in construction. There are several vesting mining rights to multiple sand bars held in the Ukiah Reach of

the Russian River (UVAP, 2011). The Site is located approximately 1,110 feet west of the Russian River and is not known to contain any mineral resources. One existing mining operation is located approximately 1.5 miles northwest of the Site, with an additional mining operation proposed approximately 4.5 miles north of the Site (UVAP, 2011).

XII.a-b) The project area does not contain mineral resources that are of value locally, to the region, or to residents. The project area is not identified as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, the proposed project would not interfere with materials extraction or otherwise cause a short-term or long-term decrease in the availability of mineral resources. No impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have **No Impact** on Mineral Resources.

XIII. NOISE. Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standard established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**THRESHOLDS OF SIGNIFICANCE:** The project would have a significant effect on noise if it would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standard established in the local general plan or noise ordinance, or applicable standards of other agencies, or generation of excessive groundborne vibration or groundborne noise levels.

**DISCUSSION:** As noted in Section 1 (Introduction) of the Ukiah Valley Area Plan (UVAP), policies in the Mendocino County General Plan Noise Element apply in the Ukiah Valley and are not specifically addressed in the UVAP. Noise is specifically addressed in Chapter 3 (Development Element) of the County of Mendocino General Plan (County General Plan). Per the County General Plan, an increase of five decibels (db) in community noise equivalent level (CNEL) or day-night average sound level (Ldn) noise levels shall be normally considered to be a significant increase in noise (Policy DE-105).

As previously discussed, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. The processing activities proposed at the Site would result in an increase in noise at the Site; however, due to the Site's location near Highway 101 and other existing industrial uses, the Site is located within a high-noise area. The proposed project, in addition to any future development at the Site, would be required to comply with all rules and regulations related to noise.

XIII.a) As described above, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. Processing activities at the Site would be limited to daytime hours. The processing activities proposed at the Site would result in an increase in noise at the Site, as the Site is currently vacant.

The Site is located adjacent to and north of several additional parcels owned and utilized by the Applicant for industrial uses, specifically solid waste services. The Ukiah Transfer Station and Recycling Center is located directly north of the Site. Surrounding uses include existing industrial uses to the north and south, existing Northwestern Pacific Railroad (NWPRR) railroad tracks and agricultural land to the east, and Taylor Drive, Highway 101, and the Highway 101 on- and off-ramps to the west of the Site. A single-family residential neighborhood is located approximately 925 feet southwest of the Site. The Site is located approximately 480 feet east of Highway 101, approximately 860 feet northeast of State Route 253, and approximately 1,110 feet west of the Russian River. Further north of the Site are a lumber yard, health club, storage yard, Mendocino Transit Authority (MTA) yard, County Animal Control facility, and the City of Ukiah wastewater treatment facility.

Although the proposed processing activities would be anticipated to increase noise levels at the Site, the proposed use would be consistent with existing uses in the vicinity. Additionally, the Site is located within a high-noise area and all existing uses within the vicinity of the Site, including the residential neighborhood located southwest of the Site, are accustomed to noise associated with Highway 101 and existing industrial uses. A less than significant impact would occur.

XIII.b) As previously discussed, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. Although the clear span building is a permanent structure, it does not require a foundation and no excavation would be required. As a result, the proposed project would not result in the generation of excessive groundborne vibration or groundborne noise levels. A less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Noise.



XIV. POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and/or businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**THRESHOLDS OF SIGNIFICANCE:** The project would have a significant effect on population and housing if it would induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and/or businesses) or indirectly (e.g., through extension of roads or other infrastructure); or displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

**DISCUSSION:** The proposed project involves a general plan amendment and zone reclassification, and grading would occur on the majority of the Site. The Site's current agricultural land use and zoning designations are proposed to be amended to Industrial (I:FP[AZ]) and Inland General Industrial (I-2:FP[AZ]), respectively, to allow future industrial uses on the Site to be principally permitted.

Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad. It is assumed that the persons currently operating this equipment at the parcel north of Ukiah would transfer to the Site once the equipment and materials are transported, therefore there would be no increase in population. Furthermore, no residential units are proposed under the project.

XIV.a-b) The proposed project would not induce substantial unplanned population growth nor displace substantial numbers of existing people or housing. As previously discussed, the Site is currently vacant, but was previously utilized for agricultural use (orchard). No existing housing units would be removed, nor is any housing proposed under the project. Processing equipment and materials from a parcel located north of Ukiah are proposed to be relocated to the Site under the project, once industrial uses are allowed on-site, in order to centralize operations. It is assumed that the persons currently operating this equipment at the parcel north of Ukiah would transfer to the Site once the equipment and materials are transported, and there would be no increase in employees or population as a result of the project. No impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have **No Impact** on Population and Housing.

<b>XV. PUBLIC SERVICES.</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**THRESHOLDS OF SIGNIFICANCE:** The project would have a significant effect on public services if it would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for (a) fire protection, (b) police protection, (c) schools, (d) parks, or (e) other public facilities.

**DISCUSSION:** As previously discussed, the proposed project involves a general plan amendment and zone reclassification (GPA/ZR) to amend the Site's current Agricultural land use and zoning designations to Industrial in order for industrial uses to be principally permitted at the Site. Additionally, the Applicant proposes to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah, in order to centralize operations and eliminate the transfer of materials to the parcel in the northern portion of Ukiah for processing. It is assumed that the persons currently operating this equipment at the parcel north of Ukiah would transfer to the Site once the equipment and materials are transported, and there would be no increase in employees or population as a result of the project.

Potential future development plans for the Site include a concrete pad and clear span structure that would be located on top of the pad. Grading, also proposed on the majority of the Site, is currently underway. As a result, the analysis included in this Initial Study assumes post-grading conditions.

XV.a) The Site is currently and would continue to be served by the City of Ukiah Fire Department and the Ukiah Valley Fire District (UVFD) (PBS – Fire, n.d.). As noted on the City's website, the City of Ukiah Fire Department is working with the UVFD as the Ukiah Valley Fire Authority (UVFA) in an effort to consolidate overhead for the two organizations while maintaining comprehensive coverage for both the City and surrounding valley (City, 2012-2018). The nearest fire station to the Site is located approximately 1.3 miles northwest, at 1500 South State Street, which contains UVFD's headquarters and South Station.

Processing equipment and materials from a parcel located north of Ukiah are proposed to be relocated to the Site under the project, once industrial uses are allowed on-site, in order to centralize operations. It is assumed that the persons currently operating this equipment at the parcel north of Ukiah would transfer to the Site once the equipment and materials are transported, and there would be no increase in employees

or population as a result of the project. Since the parcel located north of Ukiah, where the processing activities currently occur, is also located within the service boundary of UVFD, no impact would occur.

XV.b) As the project Site is located within unincorporated Mendocino County, police protection services at the Site are provided by the Mendocino County Sheriff's Office (Sheriff's Office). As noted in the County General Plan, the Sheriff's Office main station, including dispatch and detention facilities, is located at the Mendocino County Administrative Center Complex in the City of Ukiah (General Plan, 2009), approximately 3.8 miles northwest of the Site, in the northern part of Ukiah. The Sheriff's Office also provides contract law enforcement services to the City of Point Arena, the Bureau of Land Management (Cow Mountain Recreation Area), U.S. Army Corps of Engineers (Lake Mendocino), and contract police dispatching services for the City of Fort Bragg (General Plan, 2009).

The proposed project would relocate existing facilities and services from a parcel located north of Ukiah, also within unincorporated Mendocino County, to the Site. Although potential future development plans for the Site include a concrete pad and clear span structure that would be located on top of the pad, no change in police protection services is anticipated. No impact would occur.

XV.c) The Site is located within the Ukiah Unified School District (UUSD), which comprises six neighborhood elementary schools, two middle schools, a comprehensive high school, in addition to an early education preschool, independent learning opportunities for elementary and high school students, an alternative education high school, and an adult learning center, and serves approximately 5,800 students (UUSD, n.d.). The nearest school to the Site is the Ukiah Junior Academy, located approximately 1,675 feet west of the Site, across Highway 101. No residential units are proposed for construction under the project. Additionally, although the proposed project would relocate existing facilities and services from a parcel located north of Ukiah to the Site and potential future development plans for the Site include a concrete pad and clear span structure that would be located on top of the pad, the population would not be expected to increase as a result of the project. No impact would occur.

XV.d) As noted in the County General Plan, the County's park system consists of seven parks and two public access areas managed by the County. Federal lands and state parks and recreational areas are also located throughout the County (General Plan, 2009). The nearest park to the Site is Observatory Park, located approximately 2.2 miles northwest of the Site. No residential units would be constructed under the proposed project. Since the proposed project would relocate existing facilities and services from a parcel north of Ukiah to the Site and potential future development plans for the Site include a concrete pad and clear span structure that would be located on top of the pad, the population would not be expected to increase as a result of the project. No impact would occur.

XV.e) There are no elements of the proposed project that would impact public services. Since the proposed project does not include any development, including construction of any residential units, the population is not anticipated to increase as a result of the proposed project. As such, the proposed project would not create a need for other new or physically-altered public facilities (such as a library or hospital). No impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have **No Impact** on Public Services.

<b>XVI. RECREATION.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**THRESHOLDS OF SIGNIFICANCE:** The project would have a significant effect on recreation if it would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

**DISCUSSION:** The proposed project area is currently in the vicinity of the following neighborhood parks and recreational facilities:

- Observatory Park, located approximately 2.2 miles northwest of the Site;
- McGarvey Park, located approximately 2.8 miles northwest of the Site;
- Anton Stadium, located approximately 3.2 miles northwest of the Site;
- Ukiah Municipal Swimming Pool and Todd Grove Park, located approximately 3.2 miles northwest of the Site;
- Ukiah Valley Golf Course, located approximately 3.3 miles northwest of the Site;
- Ukiah Sports Complex, located approximately 3.4 miles north of the Site;
- Pomolita Field, located approximately 3.5 miles northwest of the Site;
- Vinewood Park, located approximately 3.7 miles northwest of the Site; and
- Low Gap Park and Low Gap Dog Park, located approximately 3.9 miles northwest of the Site.

XVI.a-b) No residential units would be constructed, nor is the population expected to increase, as a result of the proposed project. It is assumed that the persons currently operating this equipment at the parcel north of Ukiah would transfer to the Site once the equipment and materials are transported, and there would be no increase in employees or population as a result of the project. As such, the proposed project would not increase the usage of or demand for neighborhood and regional parks or other recreational facilities. Therefore, the proposed project would not result in the physical deterioration of parks or facilities, nor would it require the construction of new park or recreational facilities. No impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have **No Impact** on Recreation.

<b>XVII. TRANSPORTATION.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a transportation project, would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**THRESHOLDS OF SIGNIFICANCE:** The project would have a significant effect on transportation if it would conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths; conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1) (for land use projects); conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2) (for transportation projects); substantially increase hazards due to a geometric design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or result in inadequate emergency access.

**DISCUSSION:** The Site is located east of Highway 101 and directly east of Taylor Drive (CR #143), a dead-end road. Taylor Drive is accessed off of Plant Road, off South State Street. Currently, the Site is accessed via a gated entrance off of Taylor Drive in the northwestern corner of the Site. Under the project, this would remain as the primary access point until such time that industrial uses are allowed on-site and the Site is able to connect to existing C&S Waste access roads.

Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad.

XVII.a) The proposed project would not conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths. As previously discussed, processing operations, currently located on a parcel north of Ukiah, are proposed to be relocated to the Site, once industrial uses are allowed on-site. As a result, it is expected that traffic would slightly increase in the vicinity of the Site, as workers arrive to and leave the Site at the beginning and end of the workday, respectively. However, since these workers currently work at the existing processing location north of Ukiah and would transfer to the Site once the processing operations are relocated, no additional traffic associated with workers at the Site is anticipated. Additionally, since the proposed project would no longer require materials to be transferred to the parcel in the northern portion of Ukiah for processing, this would be anticipated to minimize truck trips transporting materials. A less than significant impact would occur.

XVII.b) The proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1), which states:

*"Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact."*

Since the Site is located approximately 480 feet east of Highway 101, a less than significant impact would occur.

XVII.c) The proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(2), which states:

*"Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, a lead agency may tier from that analysis as provided in Section 15152."*

Since the proposed project is not considered a transportation project, no impact would occur.

XVII.d) As discussed above, the Site is currently accessed via a gated entrance off of Taylor Drive in the northwestern corner of the Site. Under the project, this would remain as the primary access point until such time that industrial uses are allowed on-site and the Site is able to connect to existing C&S Waste access roads.

The proposed project and future connection to existing C&S Waste access roads would not be anticipated to substantially increase hazards due to design features or incompatible uses. Future development plan(s) for the Site would be required to comply with all standards, including, but not limited to, site access, roadway width, and turning radii. As such, the project and any anticipated future development at the Site would not create a significant impact that could not be mitigated with future design improvements as development warrants. A less than significant impact would occur.

XVII.e) The proposed project would not result in inadequate emergency access on the existing road system. As previously discussed, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah to the Site, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Potential future development plans for the Site include a concrete pad and clear span structure that would be located on top of the pad. Any future development or improvements at the Site would be required to meet pertinent design criteria to provide adequate emergency access in accordance with all design standards and requirements and would be evaluated once specific development proposal(s) are proposed at the Site. No impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Transportation.

<b>XVIII. TRIBAL CULTURAL RESOURCES.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Thresholds of Significance:** The project would have a significant effect on Tribal Cultural Resources if it would cause a substantial adverse change in the significance of a cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Places or in a local register of historical resources as defined in Public Resources Code §5020.1(k), or is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1.

**DISCUSSION:** As discussed under Section V, Cultural Resources, above, on June 13, 2018, LACO Associates (LACO), on behalf of the Applicant, prepared and delivered a Records Search Summary Request to the Northwest Information Center (NWIC), pursuant to the Memorandum of Understanding (MOU) between the County of Mendocino and the NWIC, to evaluate the potential to encounter archaeological or historic resources at the Site. Additionally, on June 13, 2018, LACO submitted a Native American tribal consultation request list and a Sacred Lands File (SLF) search request to the Native American Heritage Commission (NAHC), in order to confirm the local tribal contacts and whether any known cultural resources are located on-site.

**NAHC Response Letter:** A letter response received from NAHC, dated June 18, 2018, was received by LACO via e-mail on June 22, 2018. The NAHC letter indicates that a Sacred Lands File (SLF) search,

completed by the NAHC, had negative results, and included a contact list of 13 tribal contacts that may have knowledge of tribal cultural resources within the project area. On June 25, 2018, LACO sent courtesy letters to the 13 tribal contacts to request early consultation and input regarding any specific areas within the Area of Potential Effect (APE) which may be likely to harbor culturally valuable resources and may therefore merit additional protection or require a cultural monitor to be on-site during site preparation and grading. As of the date of this Initial Study, no responses from any of the 13 tribal contacts have been received.

**NWIC Records Search Summary:** A Records Search Summary Results letter was received from the NWIC on July 3, 2018, which presented the results of the records search conducted by the NWIC. The records search entailed reviewing pertinent NWIC base maps that reference cultural resources records and reports, historic-period maps, and literature for Mendocino County. As described in the letter from the NWIC, one cultural study (Green 2013, S-46352) was conducted in the vicinity in 2013 and covered approximately 5 percent of the Site. No archaeological resources have previously been recorded at the Site. Additionally, per the State Office of Historic Preservation's Historic Property Directory, which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and the National Register of Historic Places, there are no recorded buildings or structures within or adjacent to the proposed project area. Furthermore, the NWIC base maps show no previously recorded buildings or structures within the project area. Since review of historical literature and maps gave no indication of the potential for historic-period activity within the project area, there is a low potential for unrecorded historic-period archaeological resources at the Site. Further, since the 1958 USGS Ukiah 15-minute topographic quadrangle failed to depict any buildings or structures within the project area, there is a low possibility of identifying buildings or structures 45 years or older at the Site.

Based on an evaluation of the environmental setting and features associated within known sites, Native American resources in this part of Mendocino County have been found in areas populated by oak and buckeye, as well as near a variety of plant and animal resources. Sites are also found near watercourses and bodies of water. The Site is located in flat area approximately ¼-mile from the Russian River. The project area is also in proximity to hilly, wooded area and several other watercourses. Given the similarity of one or more of these environmental factors, there is a moderate potential for unrecorded Native American resources at the Site.

Since there is a moderate potential of identifying Native American archaeological resources in the project area, NWIC recommends that a qualified archaeologist conduct further archival and field study to identify cultural resources and provides specific recommendations in case any archaeological resources are encountered during construction at the Site. However, since the proposed project does not propose any ground disturbance or construction at this time, it is assumed that NWIC's recommendations would apply to any future development proposed at the Site, including the concrete pad and clear span structure that may be developed on-site in the future.

**Tribal Consultation:** On August 8, 2018, formal tribal consultation was initiated by the County of Mendocino on, in accordance with Assembly Bill 52, to request consultation and input regarding any specific areas within the Area of Potential Effect (APE) which may be likely to harbor culturally valuable resources and may therefore merit additional protection or require a cultural monitor to be on-site during the project or future Site development. Other than the NWIC letter recommending no further cultural resources need be researched and the declaration of a moderate potential for archeological or historical building resources, no further communication or comments were received from Tribal authorities. The Applicant has contracted for the additional survey to be completed prior to the issuance of entitlement.



The NAHC and NWIC response letters are included in Appendix C of this Initial Study.

XVIII.a.i) As discussed above and as provided in NWIC's letter, dated July 3, 2018, per the State Office of Historic Preservation's Historic Property Directory, which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and the National Register of Historic Places, there are no recorded buildings or structures within or adjacent to the proposed project area. Additionally, the NWIC base maps showed no previously recorded buildings or structures within the project area. Since review of historical literature and maps gave no indication of the potential for historic-period activity within the project area, there is a low potential for unrecorded historic-period archaeological resources at the Site. Further, since the 1958 USGS Ukiah 15-minute topographic quadrangle failed to depict any buildings or structures within the project area, there is a low possibility of identifying buildings or structures 45 years or older at the Site. No impact would occur.

XVIII.a.ii) The analysis contained in this Initial Study assumes completion of the grading proposed on the majority of the Site. Therefore, under the analysis, it is assumed the Site has received 51,818 cubic yards of fill, which has been distributed across the Site to create a finished grade pad one foot above flood elevations, the vegetated v-ditch and drainage swales have been constructed on-site, existing on-site vegetation, including the cottonwood saplings in the southwestern portion of the Site, have been removed, and the area disturbed under grading has been hydroseeded.

Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transport materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad.

As discussed above and as provided in the letter from the NWIC, dated July 3, 2018, there is a moderate potential for identifying Native American archaeological resources in the project area. Based on an evaluation of the environmental setting and features associated within known sites, Native American resources in this part of Mendocino County have been found in areas populated by oak and buckeye, as well as near a variety of plant and animal resources. Sites are also found near watercourses and bodies of water. The Site is located in flat area approximately ¼-mile from the Russian River. The project area is also in proximity to hilly, wooded area and several other watercourses. Given the similarity of one or more of these environmental factors, there is a moderate potential for unrecorded Native American resources at the Site.

Standard Condition advises the Applicants of the County's "Discovery Clause," which establishes procedures to follow in the event that archaeological or cultural materials are unearthed during future ground disturbing or construction activities.

**Standard Condition:** If any archaeological sites or artifacts are discovered during site excavation or construction activities, the Applicant shall cease and desist from all further excavation and disturbances within 100-feet of the discovery, and make notification of the discovery to the Director of the Department of Planning and Building Services. The Director will coordinate further actions for the protection of the archaeological resource(s) in accordance with Section 22.12.090 of the Mendocino County Code.

Additionally, in the event that development is proposed on-site in the future, the NWIC recommends that a qualified archaeologist conduct further archival and field study to identify cultural resources, and if any cultural resources are identified, that they be recorded on a DPR 523 historic resource recordation form. The NWIC letter dated July 3, 2018, notes that field study may include, but is not limited to, hand auger sampling, shovel test units, or geoarchaeological analyses as well as other common methods used to identify the presence of archaeological resources. Formal tribal consultation would also be required for any future development proposed on-site. To date, no responses from any of the 13 tribal contacts provided on the NAHC Tribal Contact List have been received for the proposed project.

With the inclusion of the recommended conditions of approval, the project is found to be consistent with Mendocino County policies for protection of archaeological, cultural, and tribal cultural resources. A less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Tribal Cultural Resources.

<b>XVIX. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**THRESHOLDS OF SIGNIFICANCE:** The project would have a significant effect on utilities and service systems if it would require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years; result in a determination by the wastewater treatment provider, which serves or may

serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure; negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals; or not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

**DISCUSSION:** The Site is within the service boundaries of the Ukiah Valley Sanitation District (UVSD) and the Willow County Water District (WCWD); however, there are currently no existing utilities located on-site and no development is currently proposed that would require utility connections. At the time that development is planned, the Applicant would establish connections.

Since the proposed project does not include specific development plans for construction any new structures, the Site would not be required to connect to or provide water, wastewater, power, or solid waste service at this time; however, water, wastewater, and solid waste services at the Site would be required if and when future development occurs. Water and wastewater service at the Site could be provided either through connection to existing services or by providing these services on-site; solid waste collection at the Site would be provided by C&S Waste, if and when necessary. Per the Applicant, connection to electrical power (Pacific Gas and Electric Company [PG&E]) is proposed, although some equipment may require the use of diesel fuel.

Potable water facilities do not currently exist at the Site, nor would such facilities be installed on-site under the project. If water is needed for dust control or other purposes under the proposed project, the contractor would import water from off-site. Since other sites owned by the Applicant are located adjacent to the Site, workers at the Site would utilize water and wastewater facilities located at these site(s).

XVIX.a) As noted above, the Site is within the service boundaries of UVSD and WCWD; however, there are currently no existing utilities located on-site and no development is currently proposed that would require utility connections. At the time that development is planned, the Applicant would establish connections.

When specific development proposal(s) are proposed and submitted to the County, the applicable utility agencies would receive project referral(s), thereby allowing for the proposed project(s) to be reviewed and conditioned to ensure potential impacts are reduced. A less than significant impact would occur.

XVIX.b) As noted in the *Ukiah Valley Special Districts Municipal Service Review (MSR)*, adopted May 6, 2013, by Mendocino County Local Agency Formation Commission (LAFCo), the WCWD provides water service to approximately 990 residential and 60 commercial connections covering approximately 2,760 acres located immediately south of Ukiah, and provides both domestic and irrigation water. WCWD supplies water through a number of sources, including wells, surface water, and Lake Mendocino water. WCWD has surface water rights for 1,440 acre-feet per year (AFY) from November to June and 726 AFY year-round through diversion of underflow of the Russian River. Additionally, WCWD contracts with the Russian River Flood Control and Water Conservation Improvement District (RRFC) for 515 AFY. It is noted in the MSR that WCWD has sufficient water rights and purchase agreements to meet future demands (LAFCo, 2013). No impact would occur.

XVIX.c) Per UVSD's website, there are three agencies that provide wastewater treatment services within the Ukiah Valley, including: (1) City of Ukiah (City); (2) UVSD; and (3) Calpella County Water District. The City owns the collection system within a portion of its jurisdictional boundaries and a Waste Water

Treatment Plant (WWTP). UVSD owns the collection system within its jurisdictional boundaries, a part of which is within the City's boundaries, (known as the overlap area). UVSD contracts via a Participation Agreement to the City of Ukiah for use of the City-owned WWTP and for maintenance of its collection system. Calpella CWD owns its collection system and WWTP (UVSD, 2018).

At this time, connection to UVSD is not proposed under the project. If and when future development is proposed on-site, the capacity of UVSD would be evaluated to determine if sufficient capacity is available to serve the future development. A less than significant impact would occur.

XVIX.d-f) The Site would be utilized for solid waste processing, once industrial uses are allowed on-site, and would not be anticipated to generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure or negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals. Additionally, the proposed project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. No impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Utilities and Service Systems.

<b>XX. WILDFIRE.</b> If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage challenges?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**THRESHOLDS OF SIGNIFICANCE:** The project would have a significant effect on wildfire if it would impair an adopted emergency response plan or emergency evacuation plan; due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage challenges.

**DISCUSSION:** The Site is not located in or near State responsibility areas. As discussed under Section XV, Public Services, above, the Site is currently and would continue to be served by the City of Ukiah Fire Department and the Ukiah Valley Fire District (UVFD), which are working together as the Ukiah Valley Fire Authority (UVFA). The fire hazard severity of the Site and surrounding area is “unzoned” (PBS, n.d.(b)). However, the Site is located in an area surrounded by existing industrial development (to the north and south of the Site) and agricultural lands to the east.

XX.a-d) The project Site is not located in or near State responsibility areas or lands classified as very high hazard severity zones (although currently “unzoned”). The Site is located in an area surrounded by existing industrial development (to the north and south of the Site) and agricultural lands to the east, and is located within the service boundary of UVFD. As such, there is low threat of wildfire at the Site. The County has not adopted an emergency response plan or emergency evacuation plan. Furthermore, the project would not require the installation or maintenance of infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, and would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage challenges. No impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have **No Impact** on Wildfire.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**THRESHOLDS OF SIGNIFICANCE:** The project would have a significant effect on mandatory findings of significance if it would have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory; have impacts that are individually limited, but cumulatively

considerable ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.); or have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

**DISCUSSION:** The project involves a general plan amendment and zone reclassification (GPA/ZR) in order to modify the Site's current land use and zoning designations (from Agricultural to Industrial), so that industrial uses would be principally permitted on-site. Under the proposed project, the Applicant is proposing to relocate existing uses (wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage) currently located on a parcel north of Ukiah, once industrial uses are allowed on-site, in order to centralize operations and eliminate the need to transfer materials to the parcel north of Ukiah for processing. Additionally, potential future development plans include a concrete pad and clear span structure that would be located on top of the pad.

XXI.a) The Site is not known to contain any wetland or riparian areas (USFWS, 2018). There is the potential for special status plant or wildlife species to occur at the Site (as provided in Table 3). Additionally, the existing cottonwood trees along the Site's western boundary may provide potential habitat for special status species. However, because the Site has been previously utilized for agricultural use, is located adjacent to existing industrial uses, and has recently been graded, there is limited potential for any special status plant or wildlife species to be present at the Site. Additionally, the Site does not contain any historical structures. A less than significant impact would occur.

XXI.b) With mitigation incorporated, there are no elements of the proposed project that would result in significant impacts. A less than significant impact would occur.

XXI.c) The project would not generate any potential direct or indirect environmental effect that would have a substantial adverse impact on human beings including, but not limited to, exposure to geologic hazards, air quality, water quality, traffic hazards, noise, and fire hazards. With mitigation incorporated, all potential impacts associated with full build-out of the project would be reduced to a less-than-significant level. A less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Mandatory Findings of Significance.

## VI. REFERENCES:

- California Air Resources Board (ARB). *Assembly Bill 32 Overview*. 2014. Accessed June 25, 2018. Available at: <https://www.arb.ca.gov/cc/ab32/ab32.htm>.
- California Department of Conservation. 2017. Farmland Mapping and Monitoring Program. *California Important Farmland Finder*. Accessed June 12, 2018. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>.
- California Department of Conservation. Division of Land Resource Protection. 2017. Farmland Mapping and Monitoring Program. Maps. *Williamson Act Program*. Accessed June 12, 2018. Available at: [http://www.conservation.ca.gov/dlrp/Pages/qh\\_maps.aspx](http://www.conservation.ca.gov/dlrp/Pages/qh_maps.aspx).
- California Department of Conservation. Division of Land Resource Protection. 2017. Farmland Mapping and Monitoring Program. Mendocino County. *2006-2016 Land Use Summary*. Accessed June 12, 2018. Available at: <http://www.conservation.ca.gov/dlrp/fmmp/Pages/Mendocino.aspx>.
- California Department of Transportation (Caltrans). Updated July 18, 2017. *Scenic Highways*. Accessed June 15, 2018. Available at: <http://www.dot.ca.gov/design/lap/livability/scenic-highways/>
- California Emissions Estimator Model (CalEEMod). 2017. Accessed June 20, 2018. Available at: <http://www.caleemod.com/>.
- California Energy Commission (CEC). October 2017. California Energy Commission Final Commission Report - Senate Bill 350: Doubling Energy Efficiency Savings by 2020. Accessed June 13, 2018. Available at: [http://docketpublic.energy.ca.gov/PublicDocuments/17-IEPR-06/TN221631\\_20171026T102305\\_Senate\\_Bill\\_350\\_Doubling\\_Energy\\_Efficiency\\_Savings\\_by\\_2030.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/17-IEPR-06/TN221631_20171026T102305_Senate_Bill_350_Doubling_Energy_Efficiency_Savings_by_2030.pdf).
- California Environmental Protection Agency (CalEPA). Air Resources Board. June 6, 2017. *2017 Edition California GHG Emission Inventory*. Accessed June 26, 2018. Available at: [https://www.arb.ca.gov/cc/inventory/pubs/reports/2000\\_2015/ghg\\_inventory\\_trends\\_00-15.pdf](https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2015/ghg_inventory_trends_00-15.pdf).
- City of Ukiah. 2012-2018. *Consolidated Fire Services*. Accessed June 18, 2018. Available at: <http://www.cityofukiah.com/projects/consolidated-fire-services/>.
- County of Mendocino. December 31, 2014. *Low Impact Development Standards Manual*. Accessed June 21, 2018. Available at: [http://www.co.mendocino.ca.us/planning/pdf/MC\\_Lid\\_Manual\\_2015\\_V2-2016.pdf](http://www.co.mendocino.ca.us/planning/pdf/MC_Lid_Manual_2015_V2-2016.pdf).
- County of Mendocino. Revised June 6, 1996. *Mendocino County Airport Comprehensive Land Use Plan*. Accessed July 2, 2018. Available at: <https://www.mendocinocounty.org/home/showdocument?id=5192>.
- County of Mendocino. Adopted August 2, 2011. *Ukiah Valley Area Plan (UVAP)*. Available at: <https://www.mendocinocounty.org/government/planning-building-services/plans-guidelines-and-eirs>.

- County of Mendocino. Planning and Building Services (PBS). No Date. Mendocino County Maps. *Earthquake Fault Zones* [map]. Accessed June 18, 2018. Available at: <https://www.mendocinocounty.org/home/showdocument?id=18409>.
- County of Mendocino. Planning and Building Services (PBS). No Date. Mendocino County Maps. *Fire Responsibility Areas & Fire District Boundaries* [map]. Accessed June 18, 2018. Available at: <https://www.mendocinocounty.org/home/showdocument?id=18413>.
- County of Mendocino. Planning and Building Services (PBS). January 2014. Mendocino County Maps. *Areas Subject to MS4 Stormwater Permitting* [map]. Accessed June 18, 2018. Available at: <https://www.mendocinocounty.org/home/showdocument?id=6976>.
- County of Mendocino and Russian River Watershed Association. *Guidelines for the Standard Urban Storm Water Mitigation Plan - Storm Water Best Management Practices for New Development and Redevelopment*. Accessed June 21, 2018. Available at: [http://www.co.mendocino.ca.us/planning/pdf/SUSMP\\_Final.pdf](http://www.co.mendocino.ca.us/planning/pdf/SUSMP_Final.pdf)
- Federal Emergency Management Agency (FEMA). No Date. *FEMA Flood Map Service Center*. Accessed July 2, 2018. Available at: <https://msc.fema.gov/portal/home>.
- Governor's Office of Emergency Services (CalOES). 2015. *MyHazards*. Accessed June 21, 2018. Available at: <http://myhazards.caloes.ca.gov/>.
- Mendocino County Air Quality Management District (MCAQMD). June 2, 2010. *Adopted Air Quality CEQA Thresholds of Significance – June 2, 2010*. Accessed June 13, 2018. Available at: [http://www.co.mendocino.ca.us/aqmd/pdf\\_files/MCAQMDCEQARecomendations.pdf](http://www.co.mendocino.ca.us/aqmd/pdf_files/MCAQMDCEQARecomendations.pdf).
- Mendocino County Air Quality Management District (MCAQMD). No Date. *Mendocino County Air Quality Rules and Regulations*. Accessed June 13, 2018. Available at: <http://www.co.mendocino.ca.us/aqmd/district-rules-and-regulations.html>.
- Mendocino County Air Quality Management District (MCAQMD). *Particulate Matter Attainment Plan*. January 2005. Accessed June 13, 2018. Available at: <http://www.co.mendocino.ca.us/aqmd/pm-attainment.html>.
- Mendocino County Local Agency Formation Commission (LAFCo). May 6, 2013. *Ukiah Valley Special Districts Municipal Service Review*. Accessed July 19, 2018. Available at: [http://mendolafco.org/msr/Ukiah%20Valley%20Special%20Districts%20APPROVED%20MSR%2005-16-13\\_FULL.pdf](http://mendolafco.org/msr/Ukiah%20Valley%20Special%20Districts%20APPROVED%20MSR%2005-16-13_FULL.pdf).
- State of California Department of Conservation (DOC). 2015. *Regulatory Maps Portal*. Accessed June 21, 2018. Available at: <http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>.
- State of California Department of Toxic Substances Control (DTSC). 2018. *EnviroStor*. Accessed June 26, 2018. Available at: <https://www.envirostor.dtsc.ca.gov/public/>.



State Water Resources Control Board (SWRCB). 2015. *GeoTracker*. Accessed June 26, 2018. Available at: <https://geotracker.waterboards.ca.gov/>.

State Water Resources Control Board (SWRCB). September 2, 2015. *Order WQ 2015-0133-EXEC*. Accessed June 21, 2018. Available at: [http://www.swrcb.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2015/wqo2015\\_0133\\_exec.pdf](http://www.swrcb.ca.gov/board_decisions/adopted_orders/water_quality/2015/wqo2015_0133_exec.pdf).

Ukiah Unified School District (UUSD). No Date. *About Ukiah Unified School District*. Accessed June 19, 2018. Available at: [https://www.uusd.net/apps/pages/index.jsp?uREC\\_ID=675525&type=d&pREC\\_ID=1067736](https://www.uusd.net/apps/pages/index.jsp?uREC_ID=675525&type=d&pREC_ID=1067736).

Ukiah Valley Sanitation District (UVSD). 2018. *Ukiah Valley Sanitation District*. Accessed July 19, 2018. Available at: <http://www.uvsd.org/>.

U.S. Fish and Wildlife Service (USFWS). Updated May 8, 2018. National Wetlands Inventory. *Wetlands Mapper*. Accessed June 12, 2018. Available at: <https://www.fws.gov/wetlands/data/Mapper.html>.

United States Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS). 2017. *Web Soil Survey*. Accessed June 14, 2018. Available at: <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>.

## FIGURES:

**Figure 1 Site Vicinity Map**

**Figure 2 Plot Plan**

**Figure 3 Grading Permit Plot Plan**

**Figure 4 Land Use and Zoning Designations**

## APPENDIX A

### **Mitigation and Monitoring Reporting Program (MMRP)**

## APPENDIX B

### **California Emissions Estimator Model (CalEEMod) Emissions Results**

## APPENDIX C

### **Cultural Resources Correspondence**

Resolution Number \_\_\_\_\_

County of Mendocino  
Ukiah, California

NOVEMBER 15, 2018

GP\_2018-0002/R\_2018-0004 – YULUPA INVESTMENTS, LLC

RESOLUTION OF THE PLANNING COMMISSION, COUNTY OF MENDOCINO, STATE OF CALIFORNIA, RECOMMENDING THE BOARD OF SUPERVISORS ADOPT A NEGATIVE DECLARATION AND GRANT A GENERAL PLAN AMENDMENT TO CHANGE APN 184-140-10 FROM AGRICULTURAL WITH FLOOD PLAIN AND AIRPORT COMBINING DISTRICTS TO INDUSTRIAL WITH FLOOD PLAIN AND AIRPORT COMBINING DISTRICT, AND REZONE OF APN 184-140-10 FROM AGRICULTURAL WITH FLOOD ZONE AND AIRPORT ZONE COMBINING DISTRICT TO GENERAL INDUSTRIAL WITH FLOOD ZONE AIRPORT COMBINING DISTRICT

WHEREAS, the applicant, YULUPA LLC, filed an application for Rezone and General Plan Amendment with the Mendocino County Department of Planning and Building Services to change the general plan land use designation of 10.63± acres (APN 184-140-10) from Agricultural - 40 acre minimum parcel size with Flood Plain and Airport Zone Combining Districts (AG-40:FP[AZ]) to Industrial with Flood Zone and Airport Zone Combining District (I:FP[AZ]), as depicted in Exhibit "A" attached hereto and incorporated by this reference, and Rezone 10.63± acres (APN 184-140-10) from Agricultural – 40 acres minimum parcel size with Flood Plain and Airport Zone Combining Districts (AG-40:FP[AZ]) to General Industrial with Flood Zone and Airport Zone Combining District (I-2:FP[AZ]), as depicted in Exhibit "B" attached hereto and incorporated by this reference, 3± miles south of Ukiah city center, on the east side of Taylor Drive (CR 143), 0.2± miles south of its' intersection with Plant Road (CR 142), located at 3201 Taylor Drive, Ukiah (APN 184-140-10); Supervisorial District 1; (the "Project"); and

WHEREAS, a Negative Declaration was prepared for the Project and noticed and made available for agency and public review on October 28, 2018 in accordance with the California Environmental Quality Act (CEQA) and the State and County CEQA Guidelines; and

WHEREAS, in accordance with applicable provisions of law, the Planning Commission held a public hearing on November 15, 2018, at which time the Planning Commission heard and received all relevant testimony and evidence presented orally or in writing regarding the Project. All interested persons were given an opportunity to hear and be heard regarding the Project; and

WHEREAS, the Planning Commission has had an opportunity to review this Resolution and finds that it accurately sets forth the intentions of the Planning Commission regarding the Project.

NOW, THEREFORE, BE IT RESOLVED, that the Planning Commission makes the following findings;

1. **General Plan and Zoning Consistency Findings:** The proposed project is for a general plan amendment and rezone to result in the parcel being reclassified from Agricultural (AG40:FP[AZ], general plan and AG-40:FP[AZ], zoning) to Industrial (I:FP[AZ], general plan and I-2:FP[AZ]), respectively. The Project request is to facilitate the future desired land uses for the site to be principally permitted and for the parcel to be in conformance with surrounding land uses and land use designations. The subject site is located in an area of unincorporated Mendocino County that houses other industrial land uses, including the Applicants' own parcels that are currently in use for solid waste activities. The future stated plans for the subject site are to consolidate the C & S solid waste business in one area, and to vacate the existing location on North State Street in Ukiah. The general plan identifies several land use goals relating to co-location of industrial uses to protect natural resources, minimize environmental degradation and protect industrial lands from future conflicts. Rezoning and redesignation of the general plan classification to allow industrial activities to

be principally permitted achieves the stated goals and policies for Mendocino County industrial lands.

2. **Ukiah Valley Area Plan Consistency Findings:** Per the UVAP, proposals to convert agricultural lands must meet specific criteria in order to be compliant. The application meets these requirements in that it no expansion of infrastructure is necessary; no net effects on agricultural uses in the vicinity results; encroaching industrial uses surround the site; and the subject parcel is located within an increasing industrial corridor, including other parcels under the same ownership and involved in the same or similar solid waste activities.
3. **Environmental Protection Findings:** The environmental impacts identified in the Initial Study for the Project have been deemed to be less than significant and therefore a Negative Declaration is adopted.

BE IT FURTHER RESOLVED that the Planning Commission recommends the Board of Supervisors grant the requested General Plan Amendment and Rezone as shown in Exhibits "A" and "B", attached hereto and incorporated herein by this reference.

BE IT FURTHER RESOLVED that the Planning Commission designates the Secretary as the custodian of the document and other material which constitutes the record of proceedings upon which the Board of Supervisors decision herein is based. These documents may be found at the office of the County of Mendocino Planning and Building Services, 860 North Bush Street, Ukiah, CA 95482.

*I hereby certify that according to the Provisions of Government Code Section 25103 delivery of this document has been made.*

ATTEST: VICTORIA DAVIS  
Commission Services Supervisor

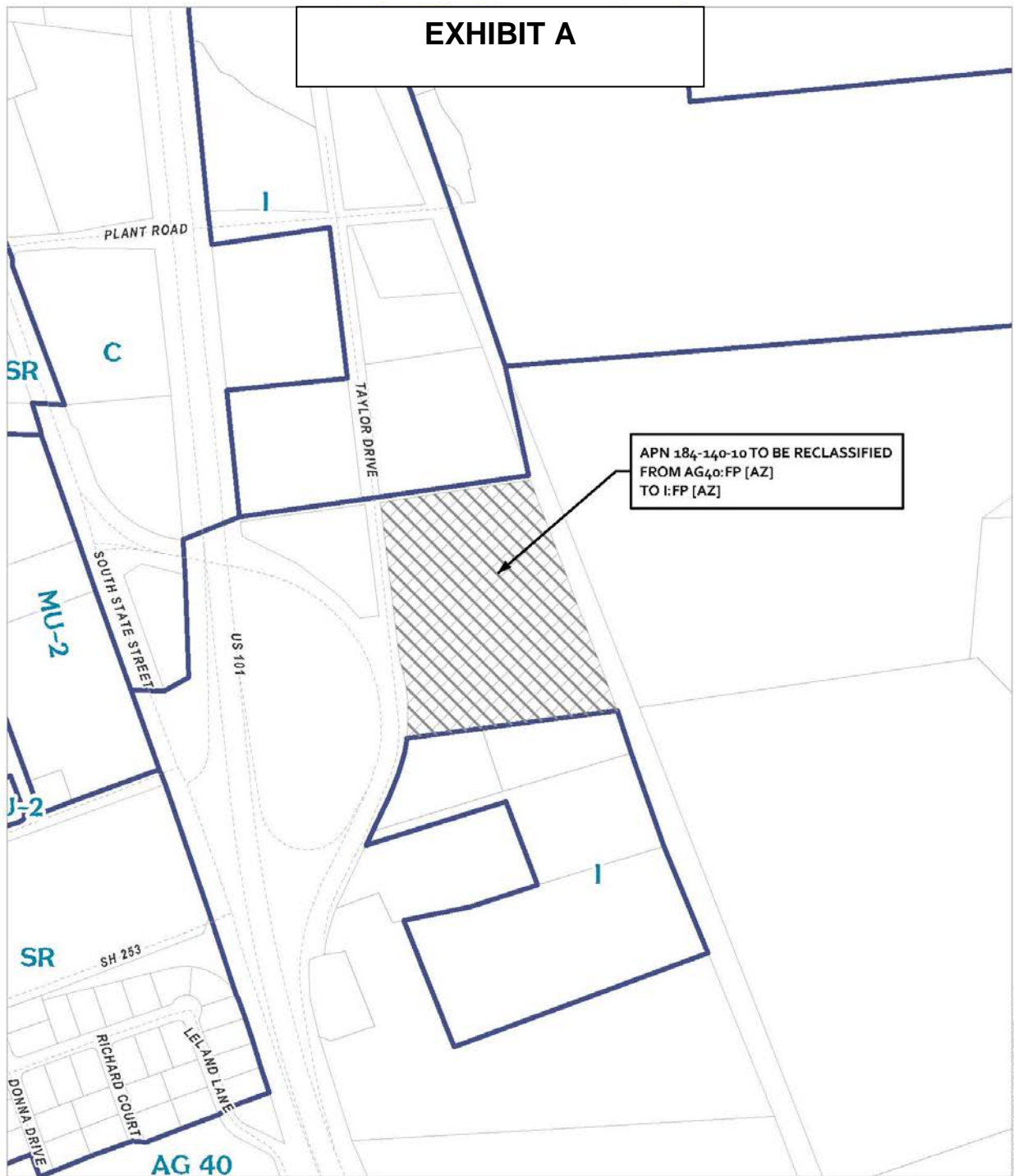
By:\_\_\_\_\_

BY: BRENT SCHULTZ  
Director

MADELIN HOLTKAMP, Chair  
Mendocino County Planning Commission

\_\_\_\_\_  
**EXHIBIT A: GENERAL PLAN EXHIBIT MAP, APN 184-140-10**  
**EXHIBIT B: REZONE EXHIBIT MAP, APN 184-140-10**

# EXHIBIT A



APN 184-140-10 TO BE RECLASSIFIED  
FROM AG40:FP [AZ]  
TO I:FP [AZ]

CASE: GP 2018-0002 / R 2018-0004  
OWNER: GOLDEN, Mary, ET AL  
APN: 184-140-10  
APLCT: Yulupa Investments, LLC  
AGENT: Rebecca Dalske  
ADDRESS: 3201 Taylor Drive, Ukiah

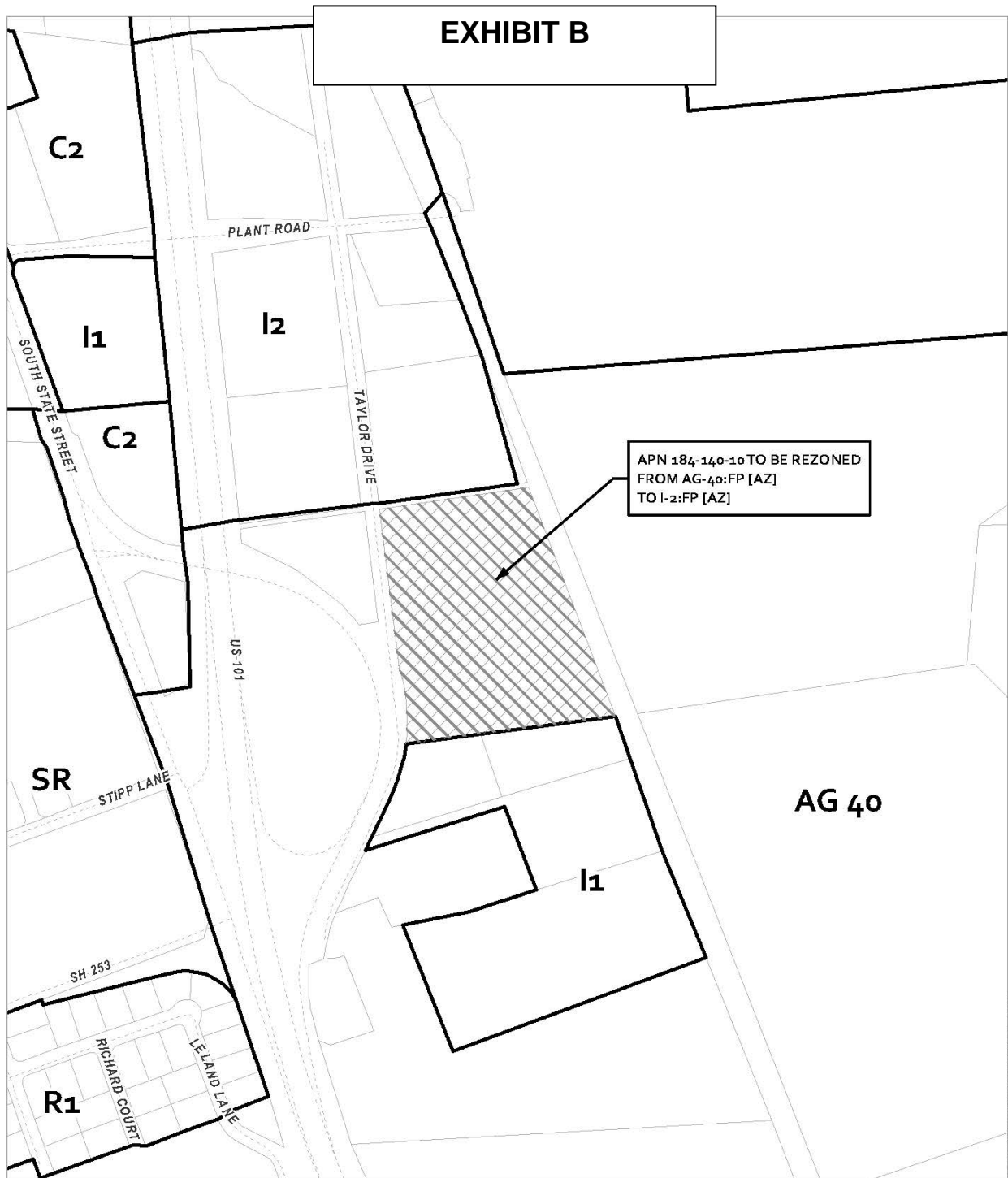
RECLASSIFY FROM: AG-FP [AZ] (Agriculture, Flood Plain & Airport Zone)  
TO: I:FP [AZ] (Industrial, Flood Plain & Airport Zone)

Public Roads  
General Plan Classes




0 200 400 Feet  
0 0.035 0.07 Miles  
1:4,800

GENERAL PLAN AMENDMENT

THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.  
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES



CASE: GP 2018-0002 / R 2018-0004  
 OWNER: GOLDEN, Mary, ET AL  
 APN: 184-140-10  
 APLCT: Yulupa Investments, LLC  
 AGENT: Rebecca Dalske  
 ADDRESS: 3201 Taylor Drive, Ukiah

 REZONE FROM: A-G:FP [AZ] (Agriculture, Flood Plain & Airport Zone)  
 TO: I-2:FP [AZ] (General Industrial, Flood Plain & Airport Zone)  
 Zoning Districts  
 Public Roads

0 200 400 Feet  
 0 0.035 0.07 Miles  
 1:4,800

REZONE EXHIBIT

**THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.**  
 DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES