



May 2, 2019

County of Mendocino
Department of Planning and Building Services
Attn: Susan Summerford, Planner III
860 N Bush St
Ukiah, CA 95482
VIA EMAIL: pbs@mendocinocounty.org

Re: Rezoning and General Plan Amendment, Case # GP_2019-0002/R_2019-0003

The City of Ukiah Community Development Department respectfully submits the following comments for consideration regarding the aforementioned project, Case # GP_2019-0002/R_2019-0003:

- 1. The goals and policies of the Ukiah Valley Area Plan do not appear to be addressed in this Rezoning and General Plan Amendment. Although the City of Ukiah generally does not comment on Ukiah Valley Area Plan (UVAP) goals and policies, as the UVAP is a component of the Mendocino County General Plan, the UVAP was envisioned as one that would “meet the needs of the County, as well as shared needs of the City” [of Ukiah], “by addressing the important issues that affect how the area will grow...” and “The Ukiah Valley is understood to be one community with collaborative decision-making between County and City agencies.” As additional projects are proposed within the City of Ukiah Sphere of Influence, it is important the City and County work together to ensure the vision of this Area Plan is realized.**

As stated in Section 1.2 of the UVAP:

The policies in other County General Plan elements may supplement those in the UVAP, but citizens and decision makers will rely most heavily on the UVAP for guidance on issues of importance in the Ukiah Valley.

–And–

If policy or implementing action is in conflict with the adopted General Plan, the policy or implementing action from the UVAP shall take precedence over the General Plan.

Specifically, we ask that you please address how the proposed rezoning and general plan amendment (the “project”) conforms to the following:



A. UVAP vision statements:

We desire our community to remain as compact as possible and prefer that our communities grow inward and upward before expanding.

–And–

The agricultural lands needed to enhance economic vitality and sustained identity of Ukiah as a rural agricultural community are protected from incompatible land uses and development.

–And–

Communities have a compact urban form surrounded by open space and agricultural land.

From the application, the purpose of the project is “to allow for the future subdivision and home building on approximately 10 acres.” The project appears incompatible with all three of the vision statements listed above, in that 1) there would be outward expansion into productive agricultural lands, lands that have not previously been utilized for suburban residential purposes; 2) the project would rezone prime farmland that is intended to be protected under the UVAP; and 3) the project would remove existing open space and agricultural land that currently acts as a buffer to existing residential development in the vicinity.

B. UVAP, Section 4, Community Design: CD1.1g, CD2.1a

CD1.1g: the project appears to expand into agricultural lands not around the existing Talmage village center. Please describe how the project focuses development around the existing small town center of Talmage.

CD2.1a: as stated above, the project would remove open space and agricultural land. CD2.1a calls for limiting building intensity between Valley communities. The project appears to intensify development between the Valley communities of the City of Ukiah and the unincorporated community of Talmage. Please address how this project would achieve consistency with UVAP Policy CD2.1a.

C. UVAP, Section 9, Open Space and Conservation: OC3.1b, OC3.4a

OC3.1b: Agricultural Land Conversion Criteria- this Policy states the requirements for projects proposing to convert Agricultural Lands to the non-agricultural classification. One of the four requirements is as follows:

- *The project site is substantially unusable for agricultural purposes due to encroaching adjacent nonagricultural uses.*

Carrying designations of both unique and prime farmland, with a part of the property that appears to still be in agricultural production, please address how this project would achieve consistency with UVAP Policy OC3.1b.

2. The environmental analysis conducted on the proposed project does not appear sufficient for determining that the project will have a less than significant environmental impact.

Page A-2 notes "Plans, Policies, and Goals of the Mendocino County General Plan and UVAP were reviewed and analyzed to determine potential significant environmental impacts." Statutes and Guidelines of the California Environmental Quality Act (CEQA) should be analyzed to determine environmental impacts.

Of particular concern is the property's designation as both prime and unique farmland. Also of concern is the property's location within a "high-risk" flood zone, Zone A, and in close proximity to the Mayacama earthquake fault zone. These considerations should be carefully analyzed to determine the appropriate level of environmental review. Even though details of the future project have not been given in the application, a rezoning from AG to SR will likely be a growth inducing action and environmental impacts under CEQA should be analyzed.

3. The application does not provide density details for the future housing development, so it is unclear if septic capacity would be adequate for such a development.

The project proposes rezoning to a General Plan designation of SR- suburban residential- but the application does not make clear what density limitations would exist for the future housing project. We have concerns about the adequacy of septic for a housing development at this location, and more specifically, if septic capacity is not adequate, we have concerns that the City may be required to extend sewer services due to the potential resulting septic failures.

Please describe future residential density limitations for the proposed housing development with a description of the adequacy of a septic system to serve this development.

Conclusion

It is our opinion that consideration of rezoning and a general plan amendment should be undertaken at such time that full project details are known, and accordingly, the application appears premature at this time. Additionally, many of the goals and policies of the Ukiah Valley Area Plan, the prevailing land use document for this project, should be addressed to confirm project consistency. We suggest the environmental analysis for the proposed project should be re-analyzed to determine future



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foreseen environmental impacts and any proposed septic service be carefully evaluated to ensure adequate capacity for a future housing project.

Please include the City of Ukiah Community Development Department in future correspondence related to this item.

Sincerely,

A handwritten signature in blue ink, appearing to read "Craig Schlatter", is written over the printed name.

Craig Schlatter
Director