



# Ukiah 2040 General Plan Update

## Draft Environmental Impact Report

*prepared by*

**City of Ukiah**

City of Ukiah Community Development Department  
300 Seminary Avenue  
Ukiah, California 95482

Contact: Craig Schlatter, Director of Community Development

*prepared with the assistance of*

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449 15th Street, Suite 303  
Oakland, California 94612

**October 2022**



**RINCON CONSULTANTS, INC.**

Environmental Scientists | Planners | Engineers

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Appendix B Supporting Biological Resources Information

Appendix C Supporting Noise Information

Appendix D Supporting Transportation Information

# Acronyms and Abbreviations

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°F	degrees Fahrenheit
AB	Assembly Bill
AFY	acre-feet per year
amsl	above mean seal level
BMP	Best Management Practices
Cal Fire	California Department of Forestry and Fire Protection
CalOES	California Office of Emergency Services
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CPUC	California Public Utilities Commission
DOC	California Department of Conservation
DOF	California Department of Finance
DOT	United States Department of Transportation
DTSC	California Department of Toxic Substances Control
du/ac	dwelling units per acre
EAP	Energy Action plan
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
GHG	greenhouse gas
LAFCo	Local Agency Formation Commission
LID	Low impact development
LRA	Local Responsibility Area
MCOG	Mendocino Council of Governments
MJHMP	Mendocino County Multi-Jurisdictional Hazard Mitigation Plan
MMBtu	millions of British thermal units
MS4	Municipal Separate Storm Sewer System

City of Ukiah  
**Ukiah 2040 General Plan Update**

MTA	Mendocino Transit Authority
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
PG&E	Pacific Gas & Electric
PRC	Public Resource Code
RCRA	Resources Conservation and Recovery Act
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Boards
SB	Senate Bill
SDWA	Safe Drinking Water Act
SHMP	State Hazard Mitigation Plan
SEMS	Standardized Emergency Management System
SOI	Sphere of Influence
SR	State Route
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
UPD	Ukiah Police Department
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
UUSD	Ukiah Unified School District
UVAP	Ukiah Valley Area Plan
UVBGS	Ukiah Valley Basin Groundwater Sustainability Agency
UVFA	Ukiah Valley Fire Authority
UVSD	Valley Sanitation District
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
WUI	Wildland-Urban Interface

# Executive Summary

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This document is a Draft Environmental Impact Report (EIR) analyzing the environmental effects of the proposed City of Ukiah 2040 General Plan, herein referred to as “Ukiah 2040” or “the project.” This section summarizes the characteristics of the project, alternatives to the project, and the environmental impacts and mitigation measures associated with the project.

## Project Synopsis

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### Project Description

This EIR has been prepared to examine the potential environmental effects of Ukiah 2040. The following is a summary of the full project description, which can be found in Chapter 2, *Project Description*.

#### *Guiding Principles*

The City of Ukiah developed guiding principles to expand on the main ideas contained in the vision statement. The following guiding principles express the key values and aspirations for Ukiah’s future and serve as guideposts for the goals, policies, and implementation programs contained in Ukiah 2040:

- Guide land uses and development that meet the needs of the community, are environmentally conscious, and maintain Ukiah as a diverse, family-oriented, and friendly community, where people from all racial, ethnic and cultural backgrounds thrive socially, economically, academically, and physically.
- Ensure development in all neighborhoods is compatible with the unique characteristics and land use patterns and fosters a sense of place.
- Promote resilient and sustainable facilities and infrastructure to ensure delivery of high-quality services.
- Promote a diverse, local, business-friendly economy that fosters new job growth and is adaptable to changes in consumer habits and market trends.



- Maintain and advance a well interconnected circulation network that accommodates and encourages alternative modes of transportation that reduce congestion and encourage walkable and bikeable neighborhoods.
- Preserve existing open space resources while enhancing accessibility to parks and recreational amenities.
- Manage, conserve, and preserve the existing natural environment to ensure sustainable longevity for present and future generations.
- Provide for a safe community through resilient infrastructure, community-wide education and preparation, and hazard planning that is responsive to potential climate-related, natural, and human-caused disasters.
- Preserve Ukiah Municipal Airport as a vital economic driver and transportation system and maintain consistency with the criteria and policies of the Ukiah Municipal Airport Master Plan and Mendocino County Airport Land Use Compatibility Plan.
- Foster an inclusive community through conditions that allow for and stimulate a diversity of housing options for community members of all ages, incomes, and ethnicities.

### *Ukiah 2040 Organization*

The project is a comprehensive update of the City's current 1995 General Plan, which is made up of 13 chapters. To provide a contemporary plan that will guide the community through the year 2040, Ukiah 2040 has been reorganized and reformatted to addresses changes in the community, including new issues and opportunities, changes in state law, and new trends. Ukiah 2040 is comprised of seven elements, summarized as follows:

- **Land Use Element.** This element will consider current and proposed land use amendments.
- **Economic Development Element.** This element will focus on goals and policies to promote and further economic development, job retention, and fiscal sustainability within Ukiah.
- **Agricultural Element.** This element will focus on goals and policies to conserve agricultural resources within Ukiah.
- **Mobility Element.** This element will address existing and planned vehicle, pedestrian, and bicycle infrastructure across the City.
- **Public Facilities, Services, and Infrastructure Element.** This element will focus on goals and policies related to public services, including but not limited to police, fire, airport, recreation, water/wastewater, and emergency services.
- **Environment and Sustainability Element.** This element will address the wide variety of parks, trails, and open spaces serving the diverse recreation needs of Ukiah residents, particularly youth, and emphasize the unique features of the City's natural environment. This element will also consider the effects of existing and planned development on natural resources located on public lands.
- **Hazards and Safety Element.** This element will cover seismic activity, other geologic hazards, fire hazards, hazardous materials, flooding, and other potential hazards, consistent with Government Code Section 65302(g). It will also address resiliency and risks from natural hazards in Ukiah, pursuant to SB 379. This element will also cover noise element requirements, consistent with Government Code Section 65302(f), including new existing noise contours as well as projected noise contours based on future traffic volumes projected to arise from improvements planned for in the Mobility Element.

### *Proposed Land Use Designations*

The project would result in changes to the existing land use pattern in the City. Ukiah 2040 introduces new and expanded land use designations that provide a greater distinction between residential and commercial land use types and better align existing land uses with corresponding designations. Specifically, the project divides the existing Commercial land use designation into more detailed designations: Downtown Core, Highway Commercial, Community Commercial, and Neighborhood Commercial. The project also introduces four new designations to the City's Land Use Map: Hillside Residential, Agriculture, Mixed Use: Brush Street Triangle, and Mixed Use: AIP-PD.

### *Planning Area*

A general plan, pursuant to State law, must address all areas within the jurisdiction's Planning Area. The Planning Area encompasses all incorporated and unincorporated territory that bears a physical relationship to the long-term planning of the city. For Ukiah, the Planning Area is defined as the area that includes both the city limits and SOI, as well as the existing Ukiah Valley Area Plan boundary.

### *Proposed Sphere of Influence*

The City of Ukiah's current sphere of influence (SOI) was adopted in 1984, Ukiah 2040 would result in an update to the City's SOI, and would include areas north, east, and south of city limits. The SOI update is intended to reduce the City's ultimate probable boundary. The decision to update the City's SOI is based upon direction provided by the Ukiah City Council in January 2020.

### *Proposed Annexation Areas*

As part of the proposed project, the City of Ukiah is pursuing three separate annexation areas currently located in the County of Mendocino's jurisdictional boundaries, totaling approximately 1,617 acres. Annexation Area A consists of 16 City-owned properties located southeast, northeast, and west of the City, totaling approximately 437 acres. Annexation Area B is comprised of the Bush Street Triangle/Masonite area north of the City and contains 63 properties, totaling approximately 473 acres. Annexation Area C is concentrated in the hills west of Ukiah. This area contains approximately 752 acres and a portion of that area (707 acres) is being pursued as part of the Western Hills Open Land Acquisition and Limited Development Agreement, approved by City Council on September 15, 2021.

### *Project Buildout*

Ukiah 2040 designates land uses defining the type and amount of development that can occur throughout the City and proposed annexation areas through the planning horizon year of 2040 (over approximately 18 years). Ukiah 2040 also includes increased residential densities (number of units) and building intensities (floor area ratio [FAR]) for certain land use designations compared to the existing density and intensity thresholds. Development projections for the project were determined by analyzing vacant and underutilized parcels with the buildout capacity potential that is allowed under the applicable updated land use designations, the incorporation of annexation areas being pursued by the City of Ukiah, and the development of mixed-use designated areas anticipated under Ukiah 2040. Based on the potential land use changes, the project has a maximum buildout potential of an additional 2,350 housing units and an additional 4,514,820 square feet of non-residential use. This buildout is an estimate of maximum buildout and is used as a conservative assumption in the environmental analysis of this EIR. While Ukiah 2040 would facilitate development, the development of the various land uses associated with Ukiah 2040 would occur over an extended

period and would depend on factors such as local economic conditions, market demand, and other financing considerations. For example, a future developer may choose to develop a site at a density lower than what is allowed, or a vacant lot could remain vacant for several years until a development is identified for that property. For these reasons, the maximum buildout is an estimate and is not intended to predict the amount of development that will occur in the City in the future. Furthermore, this buildout is projected to occur specifically within the existing City limits and Annexation Areas. Overall, Ukiah 2040 would promote infill development; the redevelopment of abandoned, obsolete, or underutilized properties; and the adaptation of existing residential units to support multi-family use. Future development within the remaining SOI and Planning Area will be analyzed under California Environmental Quality Act (CEQA) on a project-level basis.

## **Alternatives**

As required by CEQ, this EIR examines alternatives to the proposed project. Studied alternatives include the following two alternatives.

- Alternative 1: No Project Alternative
- Alternative 2: Decreased Residential Density

### *Alternative 1*

The CEQA Guidelines (Section 15126.6[e][2]) require that the alternatives discussion include an analysis of a No Project Alternative. Pursuant to CEQA, the No Project Alternative refers to the analysis of existing conditions and what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

The No Project Alternative assumes there is no change in zoning or General Plan land use designations and analyzes the existing General Plan land use designations and densities for vacant land within the City. The No Project Alternative includes identified sites for annexation, as well as housing sites identified as part of the 2019-2027 Housing Element. As the No Project Alternative focuses on existing designations, Annexation Areas would have existing land use designations, in contrast to the proposed project, which apply City land use designations to these areas. Buildout under the No Project Alternative, assuming a maximum buildout scenario, would allow for 1,692 housing units and approximately 3,831,300 square feet of additional non-residential land uses. However, the No Project Alternative would not accomplish project objectives to the extent that the proposed project would, as the No Project Alternative would provide reduced housing options and exclude multiple policies from Ukiah 2040 pertaining to community development, preservation of natural resources, sustainability, and improvement of Ukiah's circulation network.

### *Alternative 2*

The Decreased Residential Density Alternative (Alternative 2) assumes increased residential densities (1,868 units total) allowed by each land use designation compared to the existing General Plan or No Project Alternative (1,692 units total) but decreased residential densities when compared to the proposed project (2,350 total units). For example, the existing General Plan allows High Density Residential development of up to 28 dwelling units per acre (du/ac) and the proposed project (as well as Alternative 2) would allow a density of up to 40 du/ac. Both the proposed project and Alternative 2 would apply new and/or existing General Plan land use designations to lands within the city limits and Annexation Areas. However, Alternative 2 would not add new land use designations intended to increase commercial land uses and would rely on existing General Plan

land use designations (and densities). Because Alternative 2 would maintain the same designations as the General Plans for non-residential spaces, the buildout of non-residential space would be the same as the No Project Alternative. In addition, Alternative 2 would not add some of the new land use designations identified for the proposed project, which explains why Alternative 2 would have less residential units than the proposed project.

Assuming a maximum buildout scenario, buildout under Alternative 2 would allow for 1,868 housing units and approximately 3,831,300 square feet of additional non-residential land uses (refer to Table 5-1). Non-residential development would be the same as the No Project Alternative but would be less than the proposed project. Resulting residential density would be less than the proposed project and more than the No Project Alternative. However, Alternative 2 would not accomplish project objectives to the extent that the proposed project would, as Alternative 2 would provide reduced housing options.

### *Environmentally Superior Alternative*

CEQA requires identification of the environmentally superior alternative among the alternatives to the proposed project. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as the environmentally superior alternative may not be that which best meets the goals or needs of the proposed project.

The No Project Alternative is the environmentally superior alternative as it lessens the severity of most impacts of the proposed project. Because the No Project Alternative would reduce overall development (residential and non-residential) compared to the proposed project, the overall impacts from construction would also be reduced since there would be less construction. If the No Project Alternative is determined to avoid or reduce more impacts than any other alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e]). Of the other alternatives evaluated in this EIR, the Decreased Residential Density Alternative (Alternative 2) would be the environmentally superior alternative. Alternative 2 would result in less construction impacts (air quality construction emissions, biological resources, cultural resources, greenhouse gas emissions, temporary noise, tribal cultural resources, and paleontological resources) than the proposed project because of a reduction in buildout. In addition, Alternative 2 would result in less operational impacts (aesthetics, air quality, greenhouse gas emissions, noise, public services, recreation, and utilities) due to the reduced buildout. Nonetheless, compared to the proposed project, Alternative 2 would not fulfill the project objectives as well. This is because the proposed project would offer more housing opportunities and a diversity of land uses for future Ukiah residents.

Pursuant to CEQA requirements, Alternative 2 would be considered the environmentally superior alternative; however, the proposed project would offer benefits that would not be achieved by Alternative 2, primarily housing opportunities and a diversity of land uses.

## Areas of Known Controversy

The EIR scoping process did not identify areas of known controversy for Ukiah 2040. Responses to the Notice of Preparation of a Draft EIR as well as public input received at the EIR scoping meeting held by the City are summarized in Chapter 1, *Introduction*.

## Issues to be Resolved

There are no CEQA-related issues to be resolved at this time.

## Issues Not Studied in Detail in the EIR

Section 4.16, *Effects Found Not to be Significant*, briefly analyzes issues from the environmental checklist that were determined to not have significant impacts. As discussed in Section 4.16, there is no substantial evidence that significant impacts would occur to Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, and Mineral Resources.

## Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the environmental impacts, mitigation measures, and the residual impact (impact after application of mitigation, if required) associated with implementation of Ukiah 2040. Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved pursuant to Section 15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures.
- **No Impact.** The project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

**Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts**

<b>Impact</b>	<b>Mitigation Measure(s)</b>	<b>Residual Impact</b>
<b>Aesthetics</b>		
<b>Impact AES-1.</b> Development facilitated by the project may impact scenic vistas; however, compliance with Ukiah 2040 proposed goals and policies, Ukiah City Code, and the City's Design Guidelines would ensure that new development does not have a substantial adverse effect on scenic vistas. Impacts would be less than significant.	None required.	Less than Significant
<b>Impact AES-2.</b> The project would have no impact to scenic resources visible from a state scenic highway.	None required.	No Impact
<b>Impact AES-3.</b> Implementation of the project would facilitate development in previously undeveloped areas through rezoning and changes to land use. Scenic quality would be protected through adherence to City design guidelines, Ukiah city code, and implementation of Ukiah 2040 proposed goals and policies that address visual quality. Impacts would be less than significant.	None required.	Less than Significant
<b>Impact AES-4.</b> Development facilitated by the project would introduce new sources of light and glare. With adherence to existing ordinances that regulate light and glare for new development, impacts would be less than significant.	None required.	Less than Significant
<b>Agricultural and Forestry Resources</b>		
<b>Impact AG-1.</b> Development facilitated by the project is designed to encourage the continued operation of existing agriculture in and surrounding the city. Buildout of the project would result in a decrease of seven acres of designated agricultural land within the proposed annexation areas but with implementation of Ukiah 2040 goals and policies, impacts would be less than significant.	None required.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
<b>Impact AG-2.</b> The project would not conflict with existing zoning for forest land, timberland, or timberland production, nor result in the loss of forest land or convert forest land to non-forest uses. There would be no impact.	None required.	No Impact
<b>Air Quality</b>		
<b>Impact AQ-1.</b> The project would be consistent with MCAQMD's 2005 Particulate Matter Attainment Plan and BAAQMD's 2017 Clean Air Plan. Impacts would be less than significant.	None required.	Less than Significant
<b>Impact AQ-2.</b> Development facilitated by the project would result in the generation of air pollutants during construction, which could affect local air quality. Development facilitated by the project would also result in a net increase of criteria pollutants due to VMT. All feasible mitigation measures to reduce VMT are included as Policies in Ukiah 2040. Overall operational impacts would be significant and unavoidable.	<p><b>AQ-1</b>    <i>Implement BAAQMD and MCAQMD Basic Construction Mitigation Measures</i></p> <p>To reduce fugitive dust emissions from the construction of individual projects, the City shall require that future projects implement the BAAQMD and MCAQMD Basic Construction Mitigation Measures. These include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>▪ All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times a day.</li> <li>▪ All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</li> <li>▪ All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.</li> <li>▪ All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.</li> <li>▪ All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</li> <li>▪ Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.</li> <li>▪ All construction equipment shall be maintained and properly tuned in accordance with manufacture's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper conditions prior to operation.</li> </ul>	Significant and Unavoidable

Impact	Mitigation Measure(s)	Residual Impact
	<ul style="list-style-type: none"> <li>Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's number shall also be visible to ensure compliance with applicable regulations.</li> </ul> <p><i>AQ-2 Implement Measures to Reduce Operational Emissions</i></p> <p>Prior to discretionary approval by the City of Ukiah for development projects subject to CEQA review (i.e., non-exempt projects), a screening assessment shall be performed by the City using the screening criteria from the 2017 BAAQMD CEQA Air Quality Guidelines. If the project exceeds the screening size by land use type, the project applicant shall prepare and submit a technical assessment to the City for review and approval, which evaluates potential project-related operational air quality impacts. The evaluation shall be prepared in conformance with BAAQMD methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the BAAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>For site-specific development that requires refrigerated vehicles, the planning documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers, to reduce idling time and emissions.</li> <li>Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.</li> <li>Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 California Code of Regulations Chapter 10 Section 2485).</li> <li>Provide changing/shower facilities as specified in Section A5.106.4.3 of the CalGreen Code (Nonresidential Voluntary Measures).</li> <li>Provide bicycle parking facilities pursuant to Section A4.106.9 (Residential Voluntary Measures) of the CalGreen Code.</li> <li>Provide preferential parking spaces for low-emitting, fuel-efficient, and carpool/van vehicles per Section A5.106.5.1 of the CalGreen Code (Nonresidential Voluntary Measures).</li> </ul>	



Impact	Mitigation Measure(s)	Residual Impact
	<ul style="list-style-type: none"> <li>Provide facilities to support electric charging stations pursuant to Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of the CalGreen Code.</li> <li>Applicant-provided appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers) shall be Energy Star–certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star–certified or equivalent appliances shall be verified by Building &amp; Safety during plan check.</li> <li>Applicants for future development projects along existing and planned transit routes shall coordinate with the City and County to ensure that bus pad and shelter improvements are incorporated, as appropriate.</li> </ul>	
<b>Impact AQ-3.</b> Construction activities for individual projects facilitated by Ukiah 2040 could expose sensitive receptors to substantial pollutant concentrations; however, impacts would be less than significant with mitigation.	<p><b>AQ-3 Conduct Construction Health Risk Assessment</b></p> <p>For individual projects (excluding accessory dwelling units, single-family residences, and duplexes) where construction activities would occur within 1,000 feet of sensitive receptors, would last longer than two months, and would not utilize Tier 4 and/or alternative fuel construction equipment, the project applicant shall prepare a construction health risk assessment (HRA) prior to project approval. The HRA shall determine potential risk and compare the risk to the following BAAQMD thresholds:</p> <ul style="list-style-type: none"> <li>Non-compliance with Qualified Community Risk Reduction Plan;</li> <li>Increased cancer risk of &gt; 10.0 in a million;</li> <li>Increased non-cancer risk of &gt; 1.0 Hazard Index (Chronic or Acute); or</li> <li>Ambient PM<sub>2.5</sub> increase of &gt; 0.3 µg/m<sup>3</sup> annual average</li> </ul> <p>If risk exceeds the thresholds, measures such as requiring the use of Tier 4 and/or alternative fuel construction equipment shall be incorporated to reduce the risk to appropriate levels.</p>	Less than Significant with Mitigation
<b>Impact AQ-4.</b> Development facilitated by Ukiah 2040 would not create objectionable odors that could adversely affect a substantial number of people and impacts would be less than significant.	None required.	Less than Significant
<b>Biological Resources</b>		
<b>Impact BIO-1.</b> Development facilitated by the project would have the potential to modify habitat that could affect special-status species during construction and operation. Implementation of federal, state, and local regulations and policies, as well as Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4 would ensure riparian	<p><b>BIO-1: Recommended Policy for Biological Resource Assessment</b></p> <p>The City shall implement the following policy into Ukiah 2040:</p> <p><b>Policy ENV-4.9:</b> Biological Resource Assessment. The City shall require that new development proposed in or adjacent to ecologically sensitive areas, to</p>	Less than Significant with Mitigation

Impact	Mitigation Measure(s)	Residual Impact
<p>habitat and wetlands are not significantly impacted. Impacts would be less than significant with mitigation.</p>	<p>complete a site-specific biological resource assessment prepared by a qualified biologist that establishes the existing resources present.</p> <p><i>BIO-2: Pre-Construction Bird Surveys, Avoidance, and Notification</i></p> <p>For construction activities initiated during the bird nesting season (February 1 – September 15), involving removal of vegetation, abandoned structures, man-made features, or other nesting bird habitat, a pre-construction nesting bird survey shall be conducted no more than 14 days prior to initiation of ground disturbance and vegetation removal. The nesting bird pre-construction survey shall be conducted on foot and shall include a buffer around the construction site at a distance determined by a qualified biologist. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in the Mendocino Region. If nests are found, an avoidance buffer shall be determined by the biologist dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site. The buffer shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s) shall be prepared by a qualified biologist and shall be submitted to the City prior to the commencement of construction activities.</p> <p>Project site plans shall include a statement acknowledging compliance with the federal MBTA and California Fish and Game Code that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to September 15, and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.</p> <p><i>BIO-3: Roosting Bat Surveys and Avoidance Prior to Removal</i></p> <p>Prior to tree and structure removal, a qualified biologist shall conduct a focused survey of all trees and structures to be removed or impacted by construction activities to determine whether active roosts of special-status bats are present on site. Tree or structure removal shall be planned for either the spring or the fall, and timed to ensure both suitable conditions for the detection of bats and adequate time for tree and/or structure removal to occur during seasonal periods of bat</p>	

Impact	Mitigation Measure(s)	Residual Impact
	<p>activity exclusive of the breeding season, as described below. Trees and/or structures containing suitable potential bat roost habitat features shall be clearly marked or identified. If no bat roosts are found, the results of the survey will be documented and submitted to the City within 30 days of the survey, after which no further action will be required.</p> <p>If day roosts are present, the biologist shall prepare a site-specific roosting bat protection plan to be implemented by the contractor following the City's approval. The plan shall incorporate the following guidance as appropriate:</p> <ul style="list-style-type: none"> <li>▪ When possible, removal of trees/structures identified as suitable roosting habitat shall be conducted during seasonal periods of bat activity, including the following:</li> <li>▪ Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than 0.5 inch of rainfall within 24 hours occurs.</li> <li>▪ Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than 0.5 inch of rainfall within 24 hours occurs.</li> <li>▪ If a tree/structure must be removed during the breeding season and is identified as potentially containing a colonial maternity roost, then a qualified biologist shall conduct acoustic emergence surveys or implement other appropriate methods to further evaluate if the roost is an active maternity roost. Under the biologist's guidance, the contractor shall implement measures similar to or exceeding the following:</li> <li>▪ If it is determined that the roost is not an active maternity roost, then the roost may be removed in accordance with the other requirements of this measure.</li> <li>▪ If it is found that an active maternity roost of a colonial roosting species is present, the roost shall not be disturbed during the breeding season (April 15 to August 31).</li> <li>▪ Tree removal procedures shall be implemented using a two-step tree removal process. This method is conducted over two consecutive days and works by creating noise and vibration by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery) on day one. The noise and vibration disturbance, together with the visible alteration of the tree, is very effective in causing bats that emerge nightly to feed to not return to the roost that night. The remainder of the tree is removed on day two.</li> </ul>	

Impact	Mitigation Measure(s)	Residual Impact
	<ul style="list-style-type: none"> <li>▪ Prior to the demolition of vacant structures within the project site, a qualified biologist shall conduct a focused habitat assessment of all structures to be demolished. The habitat assessment shall be conducted enough in advance to ensure the commencement of building demolition can be scheduled during seasonal periods of bat activity (see above), if required. If no signs of day roosting activity are observed, no further actions will be required. If bats or signs of day roosting by bats are observed, a qualified biologist will prepare specific recommendations such as partial dismantling to cause bats to abandon the roost, or humane eviction, both to be conducted during seasonal periods of bat activity, if required.</li> </ul> <p>If the qualified biologist determines a roost is used by a large number of bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultation with CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500-foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed. Once it has been determined that the roost is clear of bats, the roost shall be removed immediately.</p> <p><i>BIO-4: Bird Safe Design</i></p> <p>Development shall incorporate bird-friendly building materials and design features, including but not limited to the following:</p> <ul style="list-style-type: none"> <li>▪ There are no “see through” passageways or corners.</li> <li>▪ Outside lighting is appropriately shielded and directed to minimize attraction to night migrating or nocturnal birds.</li> <li>▪ Interior lighting is turned off at night if not in use and designed to minimize light escaping through windows during night operation.</li> <li>▪ Landscaping is designed without features known to increase collisions.</li> </ul> <p>The City shall review and approve the bird-friendly building materials and design features prior to project approval.</p>	
<p><b>Impact BIO-2.</b> Development facilitated by the project could adversely impact riparian habitat or other sensitive natural communities during construction and/or operation. Implementation of federal, state, and local regulations and policies, as well as Mitigation Measure BIO-1 would ensure riparian habitat and wetlands are</p>	<p>Mitigation Measure BIO-1</p>	<p>Less than Significant with Mitigation</p>

Impact	Mitigation Measure(s)	Residual Impact
not significantly impacted. Impacts would be less than significant with mitigation.		
<b>Impact BIO-3.</b> Development facilitated by the project would avoid impacts to wildlife movement corridors by conserving natural areas, as directed by proposed policies and would minimize impacts to wildlife movement through implementation of Mitigation Measure BIO-1, BIO-2, BIO-3, and BIO-4. Impacts would be less than significant with mitigation.	Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4	Less than Significant with Mitigation
<b>Impact BIO-4.</b> Development facilitated by the project would conform with applicable local policies protecting biological resources and impacts would be less than significant.	None required.	Less than Significant
<b>Impact BIO-5.</b> Implementation of the project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.	None required.	No Impact
<b>Cultural Resources</b>		
<b>Impact CUL-1.</b> Development facilitated by the project would have the potential to impact historical resources. Existing Ukiah City Code and CEQA regulations, in addition to proposed Ukiah 2040 policies and mitigation would reduce impacts to historic resources. Nonetheless, impacts would be significant and unavoidable.	<p><i>CUL-1 Historical Resources Study Program</i></p> <p>The City shall require project applicants for discretionary projects to investigate the potential to impact historical resources. For a project involving a property that contains buildings structures, objects, sites, landscape/site plans, or other features that are 50 years of age or older, a historical resources study shall be conducted to determine if the project would demolish or otherwise alter the characteristics that make a historical resource eligible for inclusion in the CRHR. The study shall, at a minimum, be conducted by a qualified professional meeting the Secretary of the Interior's (SOI) Professional Qualifications Standard (PQS) for architectural history (NPS 1983). The study shall include a pedestrian survey of the project site and background research including a records search at the Northwest Information Center (NWIC), building permit research, and/or research with the local historical society(ies). The subject property(ies) and/or structures shall be evaluated for federal (as applicable), and state significance on California Department of Parks and Recreation 523 series forms, included as an appendix to the study.</p> <p>If historical impacts are identified, the study shall include recommendations to avoid or reduce impacts on historical resources and the project sponsor shall</p>	Significant and Unavoidable

Impact	Mitigation Measure(s)	Residual Impact
	<p>implement the recommendations or conduct additional environmental review. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the implementing agency for review.</p> <p>Efforts shall be made to the greatest extent practical to ensure that the relocation, rehabilitation, or alteration of the resource is consistent with the Secretary of the Interior's Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR Section 15126.4(b)(1)). Application of the Standards shall be overseen by a qualified architectural historian or historic architect meeting the PQS. In conjunction with any development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the implementing agency for review and concurrence.</p> <p>If significant historical resources are identified on a development site and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures may include documentation of the historical resource in the form of a Historic American Building Survey (HABS) report. The report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the PQS and submitted to the implementing agency prior to issuance of any permits for demolition or alteration of the historical resource. Copies of the report shall be provided to a local library and/or other appropriate repositories.</p>	
<p><b>Impact CUL-2.</b> Development facilitated by the project would have the potential to impact archaeological resources. Impacts would be less than significant with mitigation.</p>	<p><i>CUL-2 Archaeological Resources Study Program</i></p> <p>The City shall require project applicants for discretionary projects to investigate the potential to disturb archaeological resources. If preliminary reconnaissance suggests that cultural resources may exist, a Phase I cultural resources study shall be performed by a qualified professional meeting the Secretary of the Interior's (SOI) Professional Qualifications Standard (PQS) for archaeology (NPS 1983). A Phase I cultural resources study shall include a pedestrian survey of the project site</p>	<p>Less than Significant with Mitigation</p>

Impact	Mitigation Measure(s)	Residual Impact
	and sufficient background research and, as necessary, field sampling to determine whether archaeological resources may be present. Archival research shall include a records search at the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search with the Native American Heritage Commission (NAHC), and coordination with Native American tribes listed by the NAHC. The Phase I technical report documenting the study shall include recommendations to avoid or reduce impacts on archaeological resources, such as establishing environmentally-sensitive areas excluded from project activities, archaeological and/or Native American monitoring, or redesign of the project to avoid known cultural resources. The project sponsor shall implement the recommendations prior to and during construction.	
<b>Impact CUL-3.</b> Ground-disturbing activities associated with development facilitated by the project could result in damage to or destruction of human burials. However, compliance with existing regulations on human remains would ensure less than significant impacts.	None required.	Less than Significant
<b>Greenhouse Gas Emissions</b>		
<b>Impact GHG-1.</b> Development facilitated by Ukiah 2040 would make progress towards achieving State goals but would not necessarily meet State 2030 or 2045 goals. Mitigation Measures GHG-1 and GHG-2 would result in implementation of CEQA GHG thresholds and a CAP update; however, development facilitated by Ukiah 2040 would not meet the 2030 or 2045 goals until the CAP is updated and adopted. this impact would be significant and unavoidable.	<p><i>GHG-1 Adopt and Implement a CEQA GHG Emissions Threshold</i></p> <p>The City shall include and implement a new 2040 General Plan policy under the Environment and Sustainability Element to prepare, adopt, and implement a CEQA GHG Emissions threshold of significance. The City shall adopt the CEQA GHG Emissions threshold of significance by Fall 2024 for use in future CEQA GHG emissions analyses through 2030. In addition, upon completion of future CAP updates and as necessary, the City shall update the CEQA GHG Emissions threshold of significance and Ukiah CEQA GHG Checklist to be consistent with each CAP update.</p> <p><i>GHG-2 Update Ukiah CAP to the State's 2030 and 2045 GHG Emissions Goals</i></p> <p>The City shall update the Ukiah CAP by Fall 2024 to outline how Ukiah will meet the State's 2030 goal of 40 percent below 1990 emissions levels and 2045 goal of carbon neutrality. Implementation measures in the updated CAP to achieve the 2030 and 2045 goals may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>▪ Develop and adopt Zero Net Energy requirements for new and remodeled residential and non-residential development;</li> <li>▪ Develop and adopt a building electrification ordinance for existing and proposed structures;</li> <li>▪ Expand charging infrastructure and parking for electric vehicles;</li> </ul>	Significant and Unavoidable

Impact	Mitigation Measure(s)	Residual Impact
	<ul style="list-style-type: none"> <li>Implement carbon sequestration by expanding the urban forest, participating in soil-based or compost application sequestration initiatives, supporting regional open space protection, and/or incentivizing rooftop gardens; and</li> <li>Implement policies and measures included in the California 2017 Climate Change Scoping Plan, such as mobile source strategies for increasing clean transit options and zero emissions vehicles by providing electric vehicle charging stations.</li> </ul>	
<b>Land Use and Planning</b>		
<b>Impact LU-1.</b> Implementation of the project would maintain orderly development in the planning area and would not physically divide an established community. Impacts would be less than significant.	None required.	Less than Significant
<b>Impact LU-2.</b> Implementation of the project would be generally consistent with applicable land use plans, policies, or regulations adopted to avoid or mitigate environmental effects. Impacts would be less than significant.	None required.	Less than Significant
<b>Noise</b>		
<b>Impact NOI-1.</b> Construction of individual projects facilitated by Ukiah 2040 would temporarily increase noise levels, potentially affecting nearby noise-sensitive land uses. Development facilitated by the project would introduce new on-site noise sources and would contribute to increases in traffic noise. The continued regulation of on-site noise, consistent with the Ukiah City Code and implementation of proposed Ukiah 2040 policies would minimize disturbance to adjacent land uses. However, construction noise and traffic noise may still exceed noise standards and impacts would be significant and unavoidable.	<p><i>NOI-1 Construction Noise Reduction Measures</i></p> <p>The following measures to minimize exposure to construction noise shall be included as standard conditions of approval for applicable projects involving construction:</p> <ul style="list-style-type: none"> <li><b>Mufflers.</b> During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.</li> <li><b>Stationary Equipment.</b> All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers.</li> <li><b>Equipment Staging Areas.</b> Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers.</li> <li><b>Smart Back-up Alarms.</b> Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and</li> </ul>	Significant and Unavoidable



Impact	Mitigation Measure(s)	Residual Impact
	<p>replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.</p> <ul style="list-style-type: none"> <li>▪ <b>Signage.</b> For the duration of construction, the applicant or contractor shall post a sign in a construction zone that includes contact information for any individual who desires to file a noise complaint.</li> <li>▪ <b>Temporary Noise Barriers.</b> Erect temporary noise barriers, where feasible, when construction noise is predicted to exceed the acceptable standards (e.g., 80 dBA Leq at residential receivers during the daytime) and when the anticipated construction duration is greater than is typical (e.g., two years or greater). Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. If a sound blanket is used, barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class (STC) 32 or higher.</li> </ul>	
<p><b>Impact NOI-2.</b> Development facilitated by the project could temporarily generate groundborne vibration during construction, potentially affecting nearby land uses. Operation of future development would not result in substantial vibration or groundborne noise. Impacts would less than significant with mitigation.</p>	<p><i>NOI-2 Construction Vibration Control Plan</i></p> <p>Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed FTA architectural damage thresholds (e.g., 0.12 in/sec PPV for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, and static rollers as opposed to vibratory rollers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.</p>	<p>Less than Significant with Mitigation</p>
<p><b>Impact NOI-3.</b> Development facilitated by the project would not result in significantly increased airport and airstrip activity, since the Ukiah Municipal Airport would not serve travelers or industry. The continued regulation of airport noise consistent with state and federal</p>	<p>None required.</p>	<p>Less than Significant</p>

Impact	Mitigation Measure(s)	Residual Impact
regulations as well as the implementation of proposed policies in Ukiah 2040 and the Ukiah Municipal Airport Land Use Compatibility Plan would minimize disturbance to people residing or working within proximity of the Ukiah Municipal Airport. Impacts would be less than significant.		
<b>Population and Housing</b>		
<b>Impact POP-1.</b> Implementation of the project would facilitate the construction of new housing in Ukiah and would increase population growth. However, the project is intended to accommodate and plan for population growth and includes policies to manage growth and development. Therefore, impacts would be less than significant.	None required.	Less than Significant
<b>Impact POP-2.</b> Implementation of the project would not result in the displacement of substantial numbers of housing or people. The project would facilitate the development of new housing in accordance with state and local housing requirements, while preserving existing residential neighborhoods. Impacts would be less than significant.	None required.	Less than Significant
<b>Public Services and Recreation</b>		
<b>Impact PSR-1.</b> Development facilitated by the project would result in an increase to the city's population. The estimated population increase would increase demand for fire and police protection services and potentially create the need for new or altered police, fire, or other service facilities. The timing, intensity, and location of potential new facilities is unknown at this time, but new development would require additional CEQA review and compliance with existing building and zoning codes. Ukiah 2040 policies would ensure that police and fire services staffing and facilities are maintained at a level which accommodates for sustained population growth. Therefore, impacts to police and fire services associated with Ukiah 2040 would be less than significant.	None required.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
<b>Impact PSR-2.</b> Development facilitated by the project would result in an increase in population of school-aged children. Population increase would increase demand for school services and potentially create the need for new school facilities. Compliance with Ukiah 2040 policies would reduce impacts to school facilities. The timing, intensity, and location of potential new facilities is unknown at this time, but new development would require additional CEQA review and compliance with existing building and zoning codes. Therefore, impacts to schools associated with Ukiah 2040 would be less than significant.	None required.	Less than Significant
<b>Impact PSR-3.</b> Development facilitated by the project would result in an increase to population, which could increase the use of existing parks and recreational facilities, and thus reduce the city's parkland to population ratio. However, Ukiah 2040 policies would also result in additional recreational facilities. The timing, intensity, and location of potential new facilities is unknown at this time, but new development would require additional CEQA review and compliance with existing building and zoning codes. Therefore, impacts to park facilities associated with Ukiah 2040 would be less than significant.	None required.	Less than Significant
<b>Impact PSR-4.</b> Development facilitated by the project would result in an increase to population, which could increase demand for existing public facilities such as libraries. The timing, intensity, and location of potential new facilities is unknown at this time, but new development would require additional CEQA review and compliance with existing building and zoning codes. Therefore, impacts to libraries associated with Ukiah 2040 would be less than significant.	None required.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
<b>Transportation</b>		
<b>Impact TRA-1.</b> The project would not conflict with a program, plan, ordinance or policy addressing the circulation system and impacts would be less than significant.	None required.	Less than Significant
<b>Impact TRA-2.</b> The project would provide a diversity of land uses superior to countywide averages and would thus be anticipated to generate VMT at lower rates than countywide averages. The project would not conflict with or be inconsistent with CEQA Guidelines 15064.3(B) and impacts would be less than significant.	None required.	Less than Significant
<b>Impact TRA-3.</b> The project would not substantially increase hazards due to a geometric design feature and impacts would be less than significant.	None required.	Less than Significant
<b>Impact TRA-4.</b> The project would not result in inadequate emergency access and impacts would be less than significant.	None required.	Less than Significant
<b>Tribal Cultural Resources</b>		
<b>Impact TCR-1.</b> Development facilitated by the project may involve excavation, which has the potential to impact previously unidentified tribal cultural resources. However, with adherence to existing CEQA regulations and proposed Ukiah 2040 policies, impacts on tribal cultural resources would be less than significant with mitigation.	<p><i>TCR-1: Avoidance of Tribal Cultural Resources</i></p> <p>When feasible, development facilitated by the project shall be designed to avoid known tribal cultural resources. Any tribal cultural resource within 60 feet of planned construction activities shall be protected by establishing an Environmentally Sensitive Area (ESA) that would be fenced, or otherwise protected to ensure avoidance. The feasibility of avoidance of tribal cultural resources shall be determined by the City and applicants in consultation with local California Native American tribe(s).</p> <p><i>TCR-2: Unanticipated Discovery</i></p> <p>If previously unidentified tribal cultural resources are encountered during project implementation, altering the materials and their stratigraphic context shall be avoided and work shall halt immediately. Project personnel shall not collect, move, or disturb cultural resources. A representative from a locally-affiliated Native American Tribe shall be contacted to evaluate the resource and prepare a tribal cultural resources plan identifying methods necessary to protect the resource, in consultation with the City.</p>	Less than Significant with Mitigation

Impact	Mitigation Measure(s)	Residual Impact
<b>Utilities and Services Systems</b>		
<b>Impact U-1.</b> Development facilitated by the project would increase demand for water, wastewater, electric power, natural gas, telecommunications, and stormwater drainage facilities. However, Adherence to Ukiah 2040 policies would facilitate efficient energy use, sustainable and renewable energy, and safe and resilient utility and infrastructure systems that would lessen the need for new or expanded facilities. Impacts would be less than significant.	None required.	Less than Significant
<b>Impact U-2.</b> Development facilitated by the project would increase water demand; however, the City has sufficient water supply to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	None required.	Less than Significant
<b>Impact U-3.</b> Development facilitated by the project would increase demand for wastewater treatment. The timing, intensity, and location of an expansion of wastewater treatment facilities is unknown at this time, but an expansion would require additional CEQA review and compliance with existing building and zoning codes. As such, impacts related to expansion of wastewater treatment facilities as a result of Ukiah 2040 would be less than significant.	None required.	Less than Significant
<b>Impact U-4.</b> Development facilitated by the project would increase the volume of solid waste generated in Ukiah. However, Ukiah 2040 contains policies to increase recycling and comply with federal, State, and local management reduction regulations. Therefore, impacts would be less than significant.	None required.	Less than Significant
<b>Wildfire</b>		
<b>Impact WFR-1.</b> Buildout of the project could result in new development in Very High FHSZs. However, existing local and state regulations, and Ukiah 2040 proposed policies address emergency planning, management, access, and education; as well as enforce maintaining an	None required.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
<p>emergency management plan. These regulations and proposed policies would address issues related to access and emergency response and the project would not impair an emergency response plan or emergency evacuation plan. Impacts would be less than significant.</p>		
<p><b>Impact WFR-2.</b> The project envisions potential future development on sites that are in or near moderate, high, and very high FHSZs. Development facilitated by the project would expose project occupants and structures to wildfire risks for sites located in or near SRAs or very high FHSZs. Wildfire risk would be less than significant with mitigation.</p>	<p><i>WFR-1 Construction Wildfire Risk Reduction</i></p> <p>The City shall require the following measures during project construction:</p> <ol style="list-style-type: none"> <li>1. Construction activities with potential to ignite wildfires shall be prohibited during red-flag warnings issued by the National Weather Service for the site. Example activities include welding and grinding outside of enclosed buildings.</li> <li>2. Fire extinguishers shall be available onsite during project construction. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher.</li> <li>3. Construction equipment powered by internal combustion engines shall be equipped with spark arresters. The spark arresters shall be maintained pursuant to manufacturer recommendations to ensure adequate performance.</li> </ol> <p>At the City's discretion, additional wildfire risk reduction requirements may be required during construction. The City shall review and approve the project-specific methods to be employed prior to building permit approval.</p> <p><i>WFR-2 Project Design Wildfire Risk Reduction</i></p> <p>Prior to finalizing site plans, proposed structure locations shall, to the extent feasible given site constraints, be located outside of known landslide-susceptible areas and located at least 50 feet from sloped hillsides. Project landscape plans shall be encouraged to include fire-resistant vegetation native to Mendocino County and/or the local microclimate of the site and prohibit the use of fire-prone species especially non-native, invasive species. Should the project meet the above criteria, no additional measures are necessary. Should the location be within a known landslide area or within 50 feet of a sloped hillside, structural engineering features shall be incorporated into the design of the structure to reduce the risk of damage to the structure from post-fire slope instability resulting in landslides or flooding. These features shall be recommended by a qualified engineer and approved by the City prior to the building permit approval.</p>	<p>Less than Significant with Mitigation</p>

Impact	Mitigation Measure(s)	Residual Impact
<b>Paleontological Resources</b>		
<b>Impact PAL-1.</b> Development facilitated by the project has the potential to impact paleontological resources. Impacts would be less than significant with mitigation.	<b>PAL-1    <i>Retention of Qualified Professional Paleontologist</i></b> The City shall implement the following policy into Ukiah 2040: Prior to initial ground disturbance in areas underlain by high sensitivity geologic units (i.e., Quaternary terrace deposits and Plio-Pleistocene sedimentary rocks), the City shall require the project applicant retain a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP) (2010), to determine the project’s potential to significantly impact paleontological resources according to SVP (2010) standards. If necessary, the Qualified Professional Paleontologist shall recommend mitigation measures to reduce potential impacts to paleontological resources to a less than significant level.	Less than Significant with Mitigation

# 1 Introduction

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This Environmental Impact Report (EIR) examines the potential environmental effects of the proposed City of Ukiah 2040 General Plan, defined as the “project” or as “Ukiah 2040” for purposes of this environmental review. The environmental review process for the project, and legal basis for preparing an EIR, are described below.

## 1.1 Environmental Impact Report Background

This document is an EIR that evaluates the potential environmental impacts associated with implementation of the Ukiah 2040. This section of the EIR:

1. Provides an overview of the project’s background
2. Summarizes the process involved in developing the project
3. Describes the purpose of and legal authority of the EIR
4. Summarizes the scope and content of the EIR
5. Lists lead, responsible, and trustee agencies for the EIR
6. Describes the intended uses of the EIR
7. Provides a synopsis of the environmental review process required under the California Environmental Quality Act (CEQA)

The contents of other EIR sections are as follows:

- Section 2, *Project Description*, provides a detailed discussion of the project
- Section 3, *Environmental Setting*, describes the general environmental setting for the City of Ukiah
- Section 4, *Environmental Impact Analysis*, describes the potential environmental effects associated with development facilitated by the project
- Section 5, *Alternatives*, discusses alternatives to the project, including the CEQA-required “no project” alternative
- Section 6, *Other CEQA Required Sections*, discusses issues such as growth inducement and significant irreversible environmental effects
- Section 7, *References and Report Preparers*, lists informational sources for the EIR and persons involved in the preparation of the document

In addition, this EIR also includes the following Appendices:

- Appendix A. Notice of Preparation and Scoping Comments Received
- Appendix B. Supporting Biological Resources Information
- Appendix C. Supporting Noise Information
- Appendix D. Supporting Transportation Information



## 1.2 Overview of Ukiah 2040

State law (Government Code Section 65300) requires that each city and county adopt a comprehensive general plan. The existing General Plan was adopted by the City Council on December 6, 1995. The 2040 General Plan Update is a comprehensive effort to update the existing 1995 General Plan and responds to current local and regional conditions, as well as changes in State law that may not have been in effect when the General Plan was last updated. Ukiah 2040 has been organized into eight elements: Land Use; Economic Development; Agricultural; Mobility; Public Facilities, Services and Infrastructure; Environmental and Sustainability; Hazards and Safety; and Housing. The Housing Element was last certified in December 2019, covering the period 2019-2027, and was subject to a separate environmental review process. Ukiah 2040 in its entirety includes the certified 2019 Housing Element. No substantive changes are being proposed to the Housing Element as part of its incorporation into Ukiah 2040.

Together these eight elements cover all the topics that are required to be included in a General Plan under State law, which are Land Use, Open Space, Conservation, Housing, Circulation, Safety, and Noise. The General Plan defines the policy framework by which the City's physical and economic resources are to be managed and used over the next 18 years. City decision-makers will use Ukiah 2040 as a blueprint for:

- Choices about the use of land
- Protection of environmental resources
- Conservation and development of housing
- Provision of supporting infrastructure and public and human services
- Protection of people and property from natural and man-made hazards

Ukiah 2040 clarifies and articulates the City's intentions with respect to the rights and expectations of various community stakeholders, including residents, property owners, and business owners. Through Ukiah 2040, the City informs these groups of its goals, policies, and standards, and thereby communicates expectations of the public and private sectors for meeting community objectives.

Since Ukiah 2040 serves as a constitution for future development in Ukiah, any decision by the City affecting land use and development must be consistent with Ukiah 2040. This includes development projects that may be proposed in the future. An action, program, or project would be considered consistent with Ukiah 2040 if, considering all its aspects, it will further the objectives and policies of Ukiah 2040 or not obstruct their attainment.

Ukiah 2040 contains goals, policies, and implementation programs to implement the City's overarching objectives. Goals are statements that provide direction and state the desired end condition. Policies establish basic courses of action to achieve these goals, and directly guide the response of elected and appointed officials to development proposals and related community actions. Implementation programs are specific actions, procedures, standards, or techniques that the City must take to help achieve a specified goal or implement an adopted policy.

## 1.3 Purpose and Legal Authority

This EIR has been prepared in accordance with CEQA and the CEQA Guidelines. In accordance with CEQA Guidelines Section 15121(a) (California Code of Regulations, Title 14, Division 6, Chapter 3), the purpose of an EIR is to:

Inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

This EIR fulfills the requirements for a Program EIR. Although the legally required contents of a Program EIR are the same as those of a Project EIR, Program EIRs are by necessity more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a Project EIR. As provided in CEQA Guidelines Section 15168, a Program EIR may be prepared on a series of actions that may be characterized as one large project. Use of a Program EIR provides the City (as Lead Agency) with the opportunity to consider broad policy alternatives and program-wide mitigation measures and provides the City with greater flexibility to address environmental issues and/or cumulative impacts on a comprehensive basis. Agencies generally prepare Program EIRs for programs or a series of related actions that are linked geographically, are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program, or are individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways. By its nature, a Program EIR considers the broad effects associated with implementing a program (such as a General Plan or Specific Plan) and does not, and is not intended to, examine the specific environmental effects associated with specific projects that may be accommodated by the provisions of General or Specific Plans.

Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine what, if any, additional CEQA documentation needs to be prepared. If the Program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the Program EIR scope and additional environmental documentation may not be required (CEQA Guidelines Section 15168(c)). When a Lead agency relies on a Program EIR for a subsequent activity, it must incorporate applicable mitigation measures and alternatives developed in the Program EIR into the subsequent activities (CEQA Guidelines Section 15168(c)(3)). If a subsequent activity would have effects not contemplated or not within the scope of the Program EIR, the Lead Agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or a project level EIR. In this case, the Program EIR still serves a valuable purpose as the first-tier environmental analysis. CEQA Guidelines Section 15168(b) encourage the use of Program EIRs, citing five advantages:

- Provision of a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR.
- Focus on cumulative impacts that might be slighted in a case-by-case analysis.
- Avoidance of continual reconsideration of recurring policy issues.
- Consideration of broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them.
- Reduction of paperwork by encouraging the reuse of data (through tiering).

As a wide-ranging environmental document, the Program EIR uses expansive thresholds as compared to the project-level thresholds that might be used for an EIR on a specific development project. It should not be assumed that impacts determined not to be significant at a program level would not be significant at a project level. In other words, determination that implementation of the project as a program would not have a significant environmental effect does not necessarily mean that an individual project would not have significant effects based on project-level CEQA thresholds, even if the project is consistent with Ukiah 2040.

This EIR has been prepared to analyze potentially significant environmental impacts associated with future development resulting from implementation of Ukiah 2040 and provides appropriate and feasible mitigation measures or project alternatives that would minimize or eliminate these impacts. Additionally, this EIR provides the primary source of environmental information for the City of Ukiah, which is the Lead Agency, to use when considering approval and implementation of Ukiah 2040.

This EIR is intended to provide decision-makers and the public with information that enables intelligent consideration of the environmental consequences of the project. This EIR identifies significant or potentially significant environmental effects, as well as ways in which those impacts could be reduced to less-than-significant levels, whether through the imposition of mitigation measures or through the implementation of specific alternatives to the project. In a practical sense, this document functions as a tool for fact-finding, allowing concerned citizens and agency staff an opportunity to collectively review and evaluate baseline conditions and project impacts through a process of full disclosure.

## 1.4 Scope and Content

In accordance with the CEQA Guidelines, a Notice of Preparation (NOP) of a Draft EIR was circulated to potentially interested parties from May 31, 2022 to June 30 2022. The NOP, included in Appendix A, indicated that all issues on the City's environmental checklist would be discussed in the EIR. These include:

- |                                       |                                  |
|---------------------------------------|----------------------------------|
| ▪ Aesthetics                          | ▪ Noise                          |
| ▪ Agricultural and Forestry Resources | ▪ Population and Housing         |
| ▪ Air Quality                         | ▪ Public Services and Recreation |
| ▪ Biological Resources                | ▪ Transportation                 |
| ▪ Cultural Resources                  | ▪ Tribal Cultural Resources      |
| ▪ Greenhouse Gas Emissions            | ▪ Utilities and Service Systems  |
| ▪ Land Use and Planning               | ▪ Wildfire                       |

Since the publication of the NOP, the City has identified that an additional resource, paleontological resources, would be discussed in the EIR. Paleontological resources are addressed in Section 4.15, *Paleontological Resources*. This EIR evaluates potential impacts in each of these areas. The focus of this EIR is to:

- Provide information about Ukiah 2040 for consideration by the City Council in its selection of the project, an alternative to the project, or a combination of various elements from the project and its alternatives, for approval.
- Review and evaluate the potentially significant environmental impacts that could occur as a result of the growth and development envisioned in Ukiah 2040.
- Identify feasible mitigation measures that may be incorporated into Ukiah 2040 to reduce or eliminate potentially significant effects.
- Disclose any potential growth-inducing and/or cumulative impacts associated with the project.
- Examine a reasonable range of alternative growth scenarios (including growth according to the existing General Plan, reduced growth, and alternative locations within the City for growth) that

could feasibly attain the basic objectives of the project, while eliminating and/or reducing some or all of its potentially significant adverse environmental effects.

During circulation of the NOP for this EIR, the City of Ukiah received seven written responses. The City also held a public scoping meeting on June 15, 2022. The scoping meeting was held in-person at the City's Civic Center Council Chamber, and participants were also able to join virtually via teleconference. Two verbal comments were received at the scoping meeting. The NOP and a summary of all comments received are included in Appendix A. The responses to the NOP comment letters are addressed, as appropriate, in the analysis contained in the various subsections of Section 4.0, Environmental Impact Analysis. Table 1-1 summarizes the comments received, by topic, in the comment letters. Where comments are not specifically related to CEQA, Table 1-1 summarizes where in Ukiah 2040 comments are addressed.

**Table 1-1 NOP Comments and EIR Response**

Commenter	Comment/Request	How and Where It Was Addressed
<b>Agency Comments</b>		
California Department of Transportation (Caltrans)	Recommends establishing a Citywide residential density in the range of 9.1 to 21.5 dwelling units per acre for the purposes of reducing transportation related GHG emissions.	Residential densities are provided in the Land Use Element of Ukiah 2040. Hillside Residential and Rural Residential have densities of 1 and 2 dwelling unit(s) per acre, respectively. The remaining residential land use designations have densities greater than 9.1 dwelling units per acre.
	Recommends establishing a greater mix of land uses to maximize the potential benefits of higher density residential developments for vehicle miles traveled (VMT) reduction goals.	See Section 4.11, <i>Transportation</i> for a discussion of VMT and the mix of land uses.
	Encourages the City to coordinate with Mendocino Council of Governments (MCOG) to plan, program, and implement Travel Demand Management (TDM) measures suitable for the City and the greater Ukiah Valley.	The City will continue coordinating with MCOG and for discussion of TDM, see Section 4.5 in the Mobility Element of Ukiah 2040.
	Suggests the City include a variety of recommendations to promote and prioritize high quality transit that aligns with the City of Ukiah's land use, housing, and economic development policies.	See Mobility Element of Ukiah 2040 (Section 4.5).
	Suggests a focus on creating better-connected and multi-modal local roadway networks.	See Mobility Element of Ukiah 2040 (Section 4.7).
	Recommends that the City includes a discussion about traffic safety and traffic safety goals in the Transportation and Circulation Element of Ukiah 2040.	See Mobility Element of Ukiah 2040 (Section 4.6).
	Requests to view the projected increase in population over the planning horizon in addition to the traffic volume projections at buildout.	See Section 4.11, <i>Transportation</i> .

Commenter	Comment/Request	How and Where It Was Addressed
	Suggests a focus on parking management.	See proposed goal MOB-5 and policies MOB-5.1 and MOB-5.2 in Ukiah 2040.
	States that the proposed sphere of influence continues to include Talmage Road/State Route 222 and offers to relinquish the entire route, or portions of it, to the City.	The City will continue to coordinate with Caltrans regarding this comment.
California Department of Toxic Substances Control (DTSC)	Recommends that the EIR address actions to be taken for any sites impacted by hazardous waste or hazardous materials within the project area.	Section 4.16, <i>Effects Found Not to be Significant</i> includes a Hazards and Hazardous Materials section, which identifies the regulations that future projects would be required to comply with. The various requirements identified by DTSC would be implemented according to required regulations.
	Recommends consultation with other agencies that provide oversight to hazardous waste facilities.	
	Recommends the EIR includes a discussion of the potential for the project to result in the release of hazardous wastes, and recommends additional studies be carried out to delineate the nature and extent of any release that has occurred historically.	
	Recommends collecting soil samples to identify any ADL-contaminated soils prior to performing any intrusive activities.	
	Recommends an investigation of mining wastes for discussion within the EIR.	
	Recommends surveys be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk for any buildings or structures being demolished.	
	Recommends contamination sampling be conducted for any imported soils.	
	Recommends the EIR discuss required investigation for organochlorinated pesticides on any sites within the project area that have been used for agricultural, weed abatement, or related activities.	
Mendocino Local Agency Formation Commission (LAFCo)	Recommends the proposed sphere of influence (SOI) be analyzed in the Draft EIR.	The proposed SOI is included in Chapter 2, <i>Project Description</i> . Information about the setting within the proposed SOI are provided for informational purposes but because Ukiah 2040 does not include new or amended land use designations to the proposed SOI, development within these areas for the purpose of this analysis is assumed to be consistent with current development patterns and buildout opportunities. See Chapter 4.0 for more information.

Commenter	Comment/Request	How and Where It Was Addressed
	States that NOP Figure 2 legend label should be clarified as “Proposed Sphere of Influence (1995).”	Figure 2 in the NOP showed the incorrect existing SOI. Figures have been revised in Chapter 2, <i>Project Description</i> to show the correct existing and proposed SOI (see Figure 2-4).
	Recommends the EIR clarify which SOI is being proposed and analyzed as part of the project.	See Chapter 2, <i>Project Description</i> .
	Recommends the EIR study area include all areas proposed for inclusion in the SOI for purposes of analysis, identification of potential impacts and mitigation measures.	The proposed SOI is included in Chapter 2, <i>Project Description</i> . Information about the setting within the proposed SOI are provided for informational purposes but because Ukiah 2040 does not include new or amended land use designations to the proposed SOI, development within these areas for the purpose of this analysis is assumed to be consistent with current development patterns and buildout opportunities. See Chapter 4.0 for more information.
	Recommends coordination with the County regarding the proposed SOI.	The City will continue to coordinate with the County and LAFCo regarding the proposed SOI.
	Recommends the EIR identifies and describes all service providers within the proposed SOI area, including special districts and private water companies.	Service providers are addressed in Section 4.13, <i>Utilities and Service Systems</i> .
	Recommends initiating agreements among jurisdictions that outline conditions for expanding SOI boundaries in order to support the City’s annexation plans and SOI update.	The City and other cities in Mendocino County are working with the County of Mendocino on a master tax sharing agreement. The City will continue to coordinate with other jurisdictions on regional issues of interest.
	Recommends the EIR include a discussion and analysis of impacts to agricultural lands, as defined in Government Code Sections 56016 and 56064.	Impacts to agricultural lands are addressed in Section 4.2, <i>Agricultural and Forestry Resources</i> .
	Recommends the EIR identifies, maps, analyzes, and describes all agricultural and open space lands within or adjacent to lands proposed for inclusion in the SOI, including analysis of any multiple land-based values such as agricultural, biodiversity, recreation, groundwater, and carbon sequestration, to identify areas of high natural resource value where development is best avoided.	See the mapping in Section 4.2, <i>Agricultural and Forestry Resources</i> and Section 4.4, <i>Biological Resources</i> . Information about the setting within the proposed SOI are provided for informational purposes but because Ukiah 2040 does not include new or amended land use designations to the proposed SOI, development within these areas for the purpose of this analysis is assumed to be consistent with current development patterns and buildout opportunities. See Chapter 4.0 for more information.
	Recommends the EIR identifies and analyzes impacts to Williamson Act lands proposed for inclusion in the SOI.	Lands subject to Williamson Act contracts are addressed in Section 4.2, <i>Agricultural and Forestry Resources</i> . The City does not propose any buildout within the proposed SOI; therefore, no impacts are anticipated in the proposed SOI.
	Recommends the EIR analyzes the impact on the physical and economic integrity of surrounding agricultural lands.	As noted in Section 4.2, <i>Agricultural and Forestry Resources</i> , Ukiah 2040 is not expected to impact surrounding agricultural lands. See Section 4.2 for more information. As such, further analysis of the suggested impacts to these resources are beyond

Commenter	Comment/Request	How and Where It Was Addressed
		the scope of CEQA and not analyzed in this EIR. Section 4.2, <i>Agricultural and Forestry Resources</i> does show the agricultural resources within the Planning Area.
	Recommends the removal of excessive amounts of agricultural and open-space land from the SOI.	See the analysis in Section 4.2, <i>Agricultural and Forestry Resources</i> and Section 4.4, <i>Biological Resources</i> . Because buildout is not proposed within the SOI, and no impacts are anticipated, the removal of agricultural and open-space land from the SOI will not lessen environmental impacts.
	Recommends Ukiah 2040 includes policies that avoid, minimize, and/or mitigate impacts to agricultural lands.	See the Agriculture Element in Ukiah 2040.
	Recommends Ukiah 2040 includes long-term growth management strategies that provide for more efficient development to avoid the premature conversion of agricultural lands and to limit development pressure on agricultural lands.	See the Land Use Element in Ukiah 2040 (Section 2.3).
	Encourages Ukiah 2040 to include plans and policies for agricultural preservation in the Agriculture Element.	See proposed goal AG-1 and policies AG-1.1 through AG-1.3 in Ukiah 2040.
	Recommends mitigation measures to protect agricultural lands adjoining areas proposed for annexation and/or development to prevent premature conversion to non-agricultural uses and to minimize potential conflicts between proposed urban development and adjacent agricultural uses.	Ukiah 2040 is not expected to impact surrounding agricultural lands. As such, impacts to these resources are beyond the scope of CEQA and not analyzed in this EIR. See proposed goal AG-1 and policies AG-1.1. and AG-1.2.
	Recommends the EIR includes analysis of alternatives that do not result in conversion of agricultural lands.	Project alternatives are addressed in Section 5, <i>Alternatives</i> .
	Recommends the EIR demonstrates that infill or more efficient use of land is not possible prior to considering development, SOI expansion and/or annexation into agricultural lands.	See Section 4.2, <i>Agricultural and Forestry Resources</i> . The City does not propose any buildout within the proposed SOI; therefore, no impacts are anticipated in the proposed SOI.  Ukiah 2040 is not expected to impact surrounding agricultural uses and no known development is proposed or anticipated within the SOI at this time; therefore, policies related to SOI expansion and/or annexation into agricultural lands will not lessen environmental impacts.
	Recommends the EIR evaluate the need for increased police, fire, parks and recreation staff, and services resulting from the growth related to Ukiah 2040.	Police, fire, and parks and recreation staff and services are addressed in Section 4.10, <i>Public Services and Recreation</i> .
	Recommends the EIR identify, locate, and describe all disadvantaged	See Section 2.7, <i>Environmental Justice</i> in the Land Use Element for Ukiah 2040.

Commenter	Comment/Request	How and Where It Was Addressed
	unincorporated communities within and contiguous to the proposed SOI.	
	Suggests the City consider pre-zoning the area within the proposed SOI to streamline future annexations submitted for LAFCo consideration.	The proposed SOI areas have not been pre-zoned because the proposed SOI has not yet been adopted by LAFCo.
	Requests the EIR include LAFCo as a Responsible Agency and indicate the required LAFCo approvals.	See Section 1.5, <i>Lead, Responsible, and Trustee Agencies</i> .
	Suggests that a section be included in the EIR identifying all Responsible Agencies and providing information on the types of approvals or permits required from each identified agency.	Section 1.5, <i>Lead, Responsible, and Trustee Agencies</i> identifies approvals and permits that would be required by other agencies.
	Suggests clarifying whether the City anticipates tiering from the Program EIR for potential projects that require LAFCo approval.	Section 1.6, <i>Intended Uses of the EIR</i> identifies how the City will use this EIR.
	Requests notification when the Draft General Plan and associated Draft EIR become available for public review.	All agencies and members of the public that commented on the NOP will be notified of the availability of the Draft EIR.
Native American Heritage Commission (NAHC)	States that the project is subject to the requirements and provisions under both Senate Bill (SB) 18 and Assembly Bill (AB 52) for tribal cultural resources.	Tribal cultural resources are addressed in Section 4.12, <i>Tribal Cultural Resources</i> .
	Provides recommendations for conducting cultural resource assessments.	Mitigation Measures requiring cultural resource assessments are included in Section 4.5, <i>Cultural Resources</i> .
Sherwood Valley Band of Pomo Indians	Requests that recorded site(s) or cultural resources that are affected during any ground disturbance work be included within Ukiah 2040 along with cultural resource protection measures on permit applications.	Comments from the Sherwood Valley Band of Pomo Indians are addressed in Section 4.12, <i>Tribal Cultural Resources</i> .
	Provides a reminder that the Section 106 guidelines must be followed, and the Most Likely Descendant (MLD) be contacted if cultural resources are found, disturbed, or threatened.	Comments from the Sherwood Valley Band of Pomo Indians are addressed in Section 4.12, <i>Tribal Cultural Resources</i> .
NorCal 4 Health <sup>1</sup>	Recommends the EIR discusses the availability of healthy housing or green housing, including housing that prioritizes healthy indoor air quality.	Housing is addressed in Section 4.9, <i>Population and Housing</i> .
	Recommends the EIR identifies the density of retailers that sell tobacco and other nicotine products and their proximity to homes, youth-sensitive areas, and hazardous materials.	Relevant impacts to hazards are addressed in Section 4.16, <i>Effects Found Not to be Significant</i> .

<sup>1</sup> In addition to the written comments, JoAnn Saccato on behalf of NorCal 4 Health gave a spoken comment at the June 15, 2022 scoping meeting. The comments within the written letter cover those at the given at scoping meeting.



Commenter	Comment/Request	How and Where It Was Addressed
	Recommends the EIR identifies the availability of healthy food vs. unhealthy food options in neighborhoods and identifies any healthy food deserts.	Ukiah 2040 includes proposed goal LU-13, to ensure that all community members have equal access to healthy foods.
	Recommends the EIR discusses the impact of waste on community spaces, watersheds, and land.	Ukiah 2040 includes policies to reduce waste, per proposed goal ENV-9 and policies ENV-9.1 and ENV-9.2.
	Recommends the EIR evaluates outdoor public spaces, including the availability of healthy smoke-free spaces.	Recreation is addressed in Section 4.10, <i>Public Services and Recreation</i> .
<b>Public Comments</b>		
Pinky Kushner	Requests an analysis of current light pollution and the projected light pollution at buildout.	Sources of substantial light or glare that could adversely affect daytime or nighttime views are addressed in Section 4.1, <i>Aesthetics</i> .
	Requests an analysis of current noise levels and projected noise levels at buildout.	Noise is addressed in Section 4.8, <i>Noise</i>
	Requests an analysis of current air quality and projected air quality at buildout.	Air quality is addressed in Section 4.2, <i>Air Quality</i> .
	Requests a discussion about how center urban decay will be avoided, including a discussion of the County vs City conflict in revenue sharing, with mitigations.	See the Economic Development Element in Ukiah 2040 for a thorough discussion of the City's goals and policies to guide fostering a business-friendly environment, encouraging additional local employment opportunities, cultivating economic diversification, and expanding the tourism industry.
	Requests a discussion of Ukiah's existing housing stock and how it contributes to the continued economic vitality of the community.	Housing is addressed in Section 4.9, <i>Population and Housing</i> .
<b>Spoken Comments</b>		
Robin Sunbeam	Requests a discussion of agricultural belts around populated areas to reduce the use of fossil fuels	Agricultural areas are discussed in Section 4.2, <i>Agricultural and Forestry Resources</i>

## 1.5 Lead, Responsible, and Trustee Agencies

The City of Ukiah is the lead agency under CEQA for this EIR because it has primary discretionary authority to approve the project. CEQA Guidelines Section 15381 defines responsible agencies as other public agencies that are responsible for carrying out/implementing a specific component of a project or for approving a project (such as an annexation) that implements the goals and policies of a General Plan. There are no responsible agencies for the project. Although not responsible agencies under CEQA, several other agencies have review authority over aspects of the project or approval authority over projects that could potentially be implemented in accordance with various objectives and policies included in Ukiah 2040. These agencies and their roles are listed below.

- The State Geologist is responsible for the review of the City's program for minimizing exposure to geologic hazards and for regulating surface mining activities.

- The Mendocino Local Agency Formation Commission (LAFCo) has responsibility for approving any annexations to the City that might occur over the life of Ukiah 2040. LAFCo is also responsible for establishing, amending, and updating SOIs for the City of Ukiah. LAFCo can use this EIR to adopt the City's proposed annexation efforts and proposed SOI.
- The California Department of Transportation (Caltrans) has responsibility for approving future improvements to the state highway system, including Highway 101.
- The California Department of Fish and Wildlife (CDFW) has responsibility for issuing take permits and streambed alteration agreements for any projects with the potential to affect plant or animal species listed by the State of California as rare, threatened, or endangered; or that would disturb waters of the State.
- The Mendocino County Airport Land Use Commission (ALUC) has the responsibility of reviewing Ukiah 2040 and future individual projects, as applicable, for consistency with the Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP).
- Any other public agencies which may own land within City boundaries.

Trustee agencies have jurisdiction over certain resources held in trust for the people of California but do not have a legal authority over approving or carrying out the project. CEQA Guidelines Section 15386 designates four agencies as trustee agencies: CDFW with regards to fish and wildlife, native plants designated as rare or endangered, game refuges, and ecological reserves; the State Lands Commission, with regard to state-owned "sovereign" lands, such as the beds of navigable waters and State school lands; the California Department of Parks and Recreation, with regard to units of the State park system; and, the University of California, with regard to sites within the Natural Land and Water Reserves System. The CDFW, due to the potential for rare or endangered species, is the only trustee agency for Ukiah 2040.

## 1.6 Intended Uses of the EIR

This EIR is an informational document for use in the City's review and consideration of Ukiah 2040. This document is a Program EIR. CEQA Guidelines Section 15168(a) states that:

A Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) as logical parts in a chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria, to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

As a programmatic document, this EIR presents and discloses a region-wide assessment of the environmental impacts of Ukiah 2040. The information and analysis in this EIR will be used by the Ukiah Planning Commission and City Council, trustee agencies, and the general public.

Ukiah 2040 will guide subsequent actions taken by the City in its review of new development projects and the establishment of new and/or revised City-wide or area-specific programs. This program EIR serves as a first-tier environmental document under CEQA, supporting second-tier environmental documents for projects with detailed designs that have been developed for implementation within the City. Analysis of site-specific impacts of individual projects is not the intended use of a Program EIR. Many specific projects are not currently defined to the level that would allow for such an analysis at this time. Individual and specific environmental analysis of each

project will be undertaken as necessary in the future by the City prior to each project being considered for approval. Therefore, the City, acting as the Lead Agency, would be able to prepare subsequent environmental documents that incorporate by reference the appropriate information from this Program EIR regarding secondary effects, cumulative impacts, broad alternatives, and other relevant factors. If the City finds that implementation of a later activity would have no new effects and that no new mitigation measures would be required, that activity would require no additional CEQA review. Where subsequent environmental review is required, such review would focus on significant effects specific to the future project, or its site that have not been considered in this Program EIR.

## 1.7 Environmental Review Process

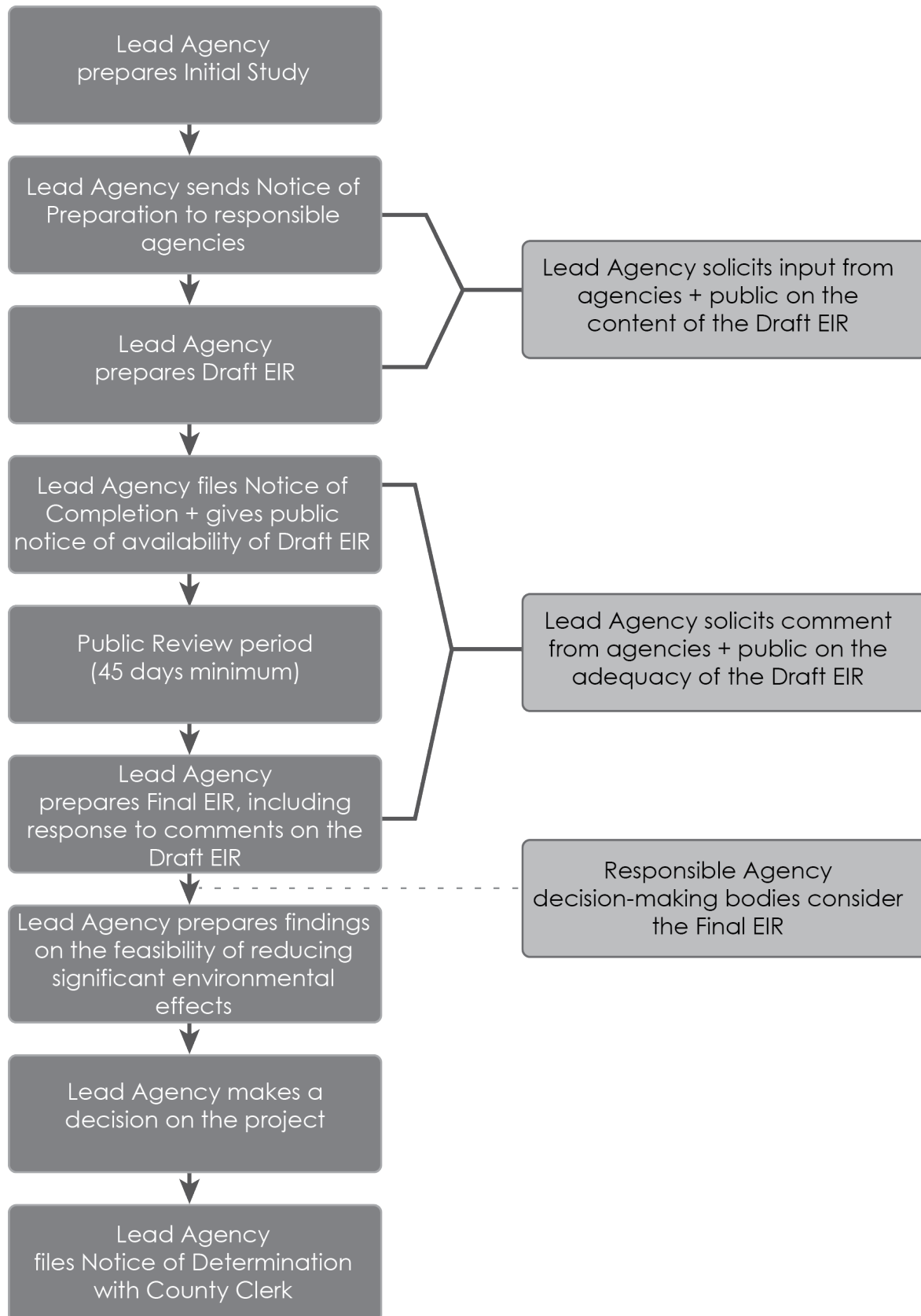
The environmental impact review process required under CEQA is summarized below and illustrated in Figure 1-1. The steps appear in sequential order.

1. **Notice of Preparation (NOP) Distributed.** Immediately after deciding that an EIR is required, the lead agency must file a NOP soliciting input on the EIR scope to "responsible," "trustee," and involved federal agencies; to the State Clearinghouse, if one or more state agencies is a responsible or trustee agency; and to parties previously requesting notice in writing. The NOP must be posted in the County Clerk's office for 30 days. A scoping meeting to solicit public input on the issues to be assessed in the EIR is not required but may be conducted by the lead agency. The NOP public comment period for the Ukiah 2040 EIR was from May 31 to June 30, 2022 and a scoping meeting was held on June 15, 2022. Public comments were received in response to the NOP and scoping process.
2. **Draft EIR Prepared.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) alternatives; g) mitigation measures; and h) irreversible changes.
3. **Public Notice and Review.** A lead agency must prepare a Public Notice of Availability (NOA) of an EIR. The NOA must be placed in the County Clerk's office for 30 days (Public Resources Code Section 21092) and sent to anyone requesting it. Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must consult with and request comments on the Draft EIR from responsible and trustee agencies, and adjacent cities and counties. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days, unless a shorter period is approved by the Clearinghouse (Public Resources Code 21091). Distribution of the Draft EIR may be required through the State Clearinghouse. This EIR will be circulated for a 45-day public review and will be sent to the State Clearinghouse.
4. **Notice of Completion.** A lead agency must file a Notice of Completion (NOC) with the State Clearinghouse as soon as it completes a Draft EIR.
5. **Final EIR.** A Final EIR must include: a) any revisions to the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.
6. **Certification of Final EIR.** The lead agency shall certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the

lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project.

7. **Lead Agency Project Decision.** A lead agency may: a) disapprove a project because of its significant environmental effects; b) require changes to a project to reduce or avoid significant environmental effects; or c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted.
8. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible. If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that set forth the specific social, economic, or other reasons supporting the agency's decision.
9. **Mitigation Monitoring/Reporting Program.** When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
10. **Notice of Determination.** An agency must file a Notice of Determination after deciding to approve a project for which an EIR is prepared. A local agency must file the Notice with the County Clerk. The Notice must be posted for 30 days and sent to anyone previously requesting notice. Posting of the Notice starts a 30-day statute of limitations on CEQA challenges.

**Figure 1-1 Environmental Review Process**



## 2 Project Description

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The project analyzed in this EIR is the proposed City of Ukiah 2040 General Plan, herein referred to as “Ukiah 2040” or “the project.” Major components of Ukiah 2040 include the following elements: Land Use; Economic Development; Agricultural; Mobility; Public Facilities, Services, and Infrastructure; Environment and Sustainability; and Hazards and Safety. This section of the EIR describes the key characteristics of the project, including the project proponent/lead agency, the geographic extent of the plan, project objectives, types and extent of development forecasted under Ukiah 2040, and required approvals.

### 2.1 Project Purpose

The project is a comprehensive update of the City’s current 1995 General Plan, which is made up of 13 chapters: Open Space & Conservation; Noise; Safety; Energy; Airport; Parks and Recreation; Historic & Archaeological Resources; Community Facilities & Services; Circulation & Transportation; Housing; Community Design; Economic Development; and Land Use. The project will serve as a long-term framework for future growth and development in the City by representing the community’s view of its future and contains the goals and policies upon which the City Council, Planning Commission, staff, and the entire community will base land use and resource decisions. To provide a contemporary plan that will guide the community through the year 2040, Ukiah 2040 has been reorganized and reformatted to addresses changes in the community, including new issues and opportunities, changes in state law, and new trends.

### 2.2 Project Proponent/Lead Agency

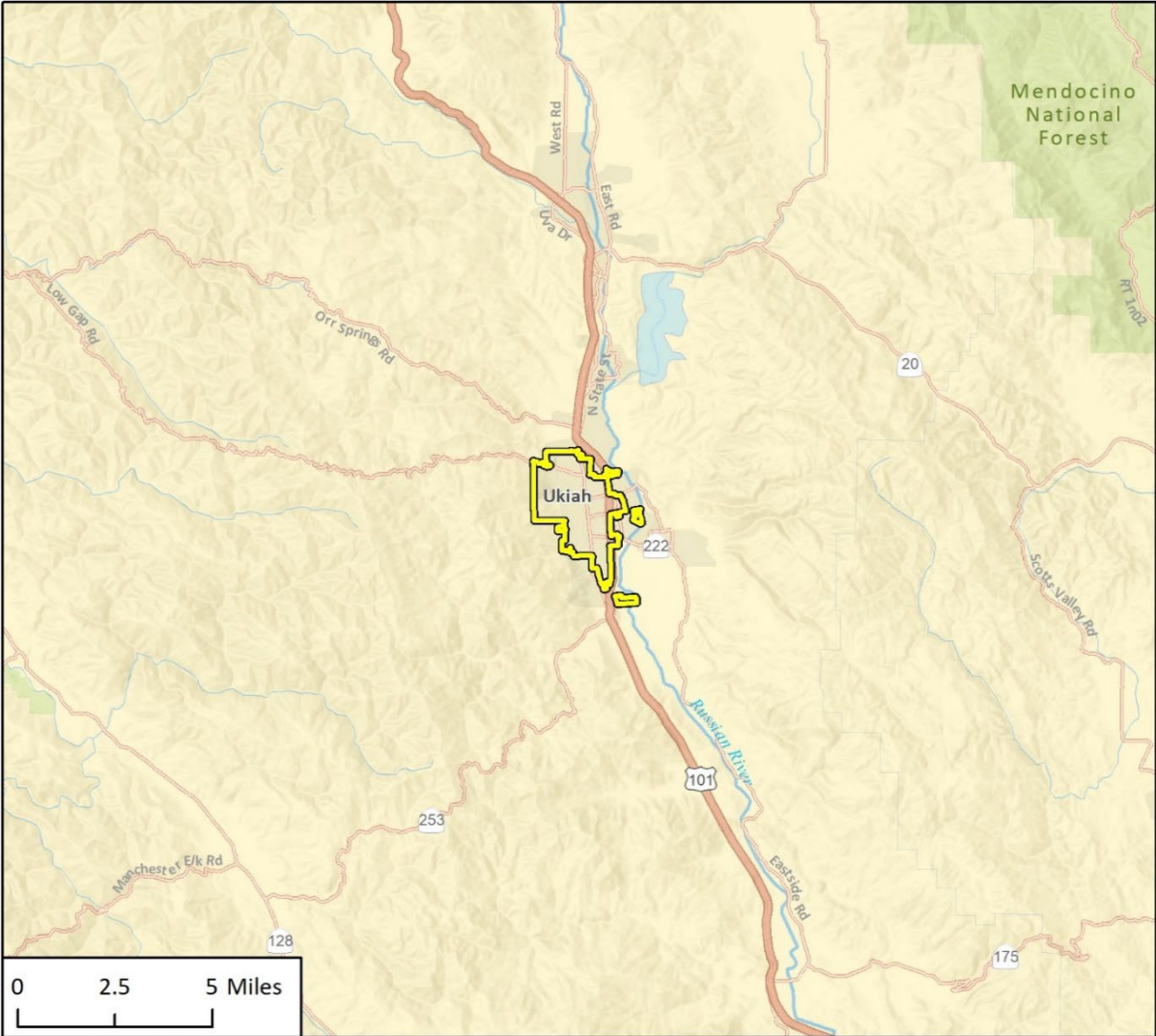
The City of Ukiah (City) is the project proponent and the lead agency for the proposed City of Ukiah 2040 General Plan. The City’s Community Development Department, located at 300 Seminary Avenue, prepared this EIR with the assistance of Rincon Consultants, Inc. and Mintier-Harnish.

### 2.3 Project Location


The City of Ukiah is located in the Northern Coast of California, approximately 45 miles north of Healdsburg and 155 miles south of Eureka. The City is regionally significant, serving as the seat of Mendocino County (County) and the largest of four incorporated cities in the County. The nearest major city to Ukiah is Santa Rosa, located approximately 60 miles south. The larger urban centers of San Francisco and Sacramento are located approximately 100 miles south and southeast of Ukiah, respectively. Figure 2-1 shows a regional map of the City’s location relative to nearby cities, communities, and the state highway system.

The City of Ukiah is regionally accessible from U.S. Highway 101, which crosses the City from north to south. State Route (SR-) 253 also provides regional access to the City by connecting Ukiah to the unincorporated community of Boonville, located along SR-128. The City is served by a surface street system that includes four-lane minor arterial roadways and two-lane collector streets. Ukiah also has a system of bike lanes and sidewalks throughout the City, which are particularly robust through the downtown and surrounding areas. The City is directly served by Mendocino Transit Authority (MTA), a commuter bus line that serves Mendocino County with connections to Sonoma County

Figure 2-1 Regional Location



Imagery provided by Esri and its licensors © 2022. Elledge Peak & Ukiah quadrangles. T15N R12W S08, 16-21, 28-30, 32, 33 & T15N R13W S13, 24.

 City of Ukiah

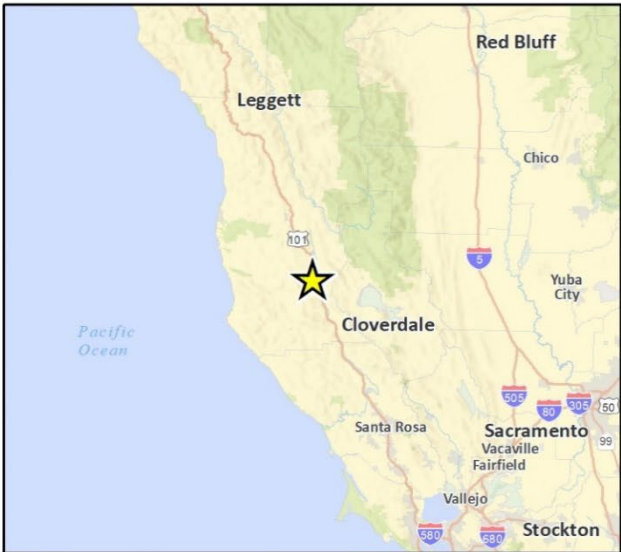


Fig. 1 Regional Location

Transit, Golden Gate Transit, Lake Transit, and Santa Rosa CityBus (MTA 2022). The City of Ukiah also owns and operates the Ukiah Municipal Airport, located along U.S. Highway 101 in the southern portion of the City.

The City itself spans more than 3,000 acres (4.6 square miles) within the greater Ukiah Valley. The Ukiah Valley is comprised of more than 40,000 acres and runs 9 miles long, north to south, along U.S. Highway 101. Several small unincorporated communities lie closer to the City within the Ukiah Valley, including El Roble, Vichy Springs, The Forks, and Calpella. The Russian River follows the Ukiah Valley just east of the City limits, and the Redwood Valley neighbors the City to the north (City of Ukiah 2020).

The project applies to the extended planning area for the City of Ukiah, including all areas within the City limits and Sphere of Influence (SOI). The City's SOI designates the City's probable future boundary and service area. The City's current SOI was adopted in 1984 and is coterminous with the 2011 Ukiah Valley Area Plan (UVAP) boundary. As directed by the Ukiah City Council, the City intends to update its SOI as part of the project to the proposed SOI shown in Figure 2-2.

## 2.4 Regulatory Setting

State law (Government Code Sections 65300 through 65303.4) sets forth the requirement for each municipality to adopt and periodically update its general plan, and sets the requirement that a general plan contain the following mandatory subject areas, or "elements," including Land Use, Circulation, Housing, Open Space, Conservation, Noise, Safety. State law also allows for optional elements that can be organized or combined at the City's discretion. Ukiah 2040 includes the required subjects/elements, as detailed in Section 2.7.3, *Ukiah 2040 Organization*. A Housing Element was adopted by the City in 2019, and the noise content required by State law is reflected within the Hazards and Safety Element.

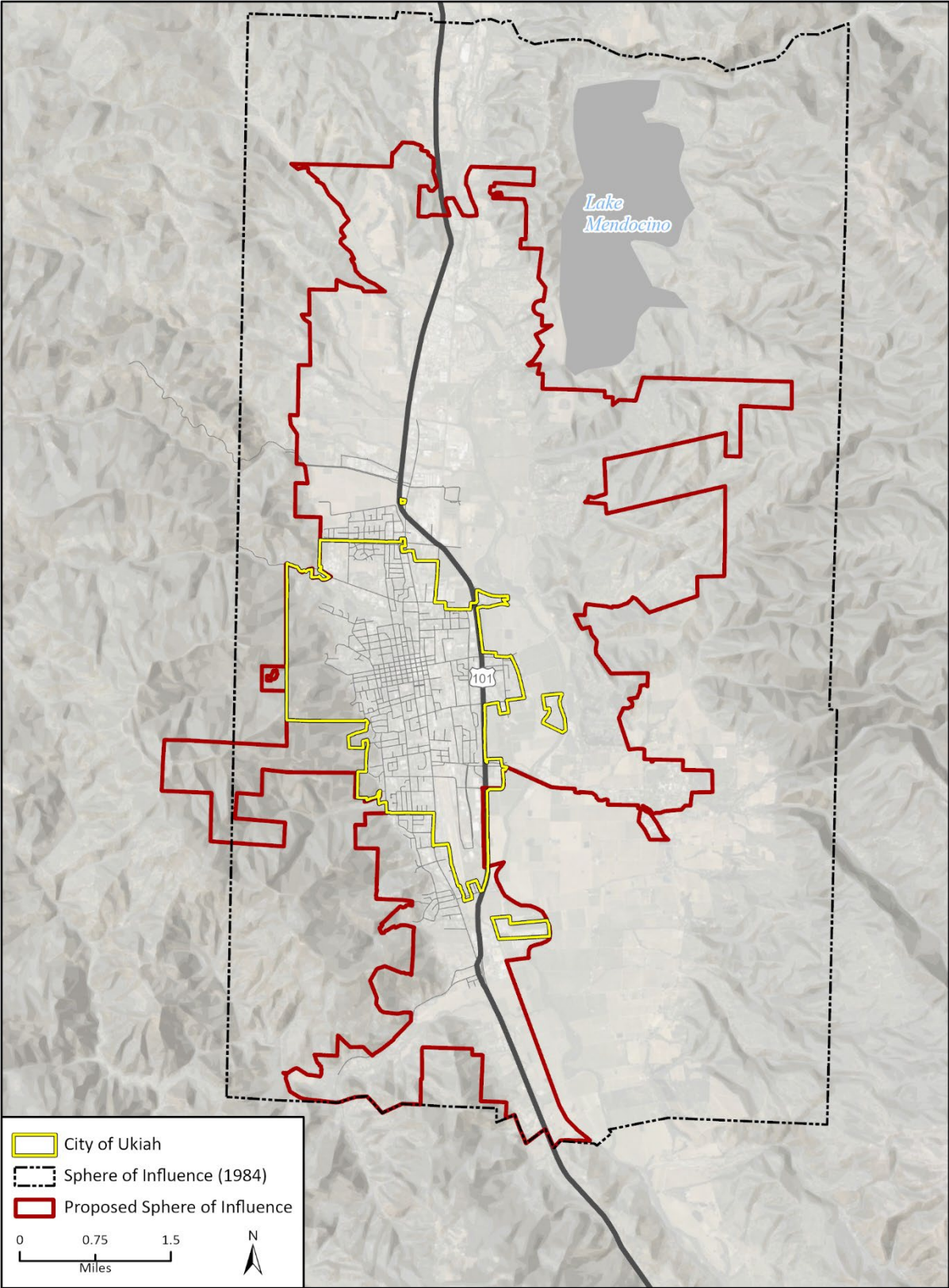
Under State law, a property's zoning is required to be consistent with its general plan land use classification (Government Code Section 65860). Section 65860(c) of the Government Code requires that when a general plan is amended in a way that makes the zoning ordinance inconsistent with the general plan, "the zoning ordinance shall be amended within a reasonable time so that it is consistent with the general plan as amended."

## 2.5 Existing Land Use Pattern

The City of Ukiah's existing land use pattern is shaped by the surrounding topography and circulation patterns. Primary land uses include residential (33.1 percent), public (18.7 percent), commercial (12.3 percent), and parks and open space (9.7 percent) (City of Ukiah 2020). Nearly 8 percent of parcels (approximately 120 acres) within the City limits are currently vacant and available for development, most of which are designated for residential development. The current 1995 General Plan specifies nine separate land use designations, including rural residential, low density residential, medium density residential, high density residential, commercial, public, recreational, master plan area, and open space. Figure 2-3 depicts the City's existing land use designations in addition to any relevant County land use designations within the three annexation areas being pursued by the City, as described further in Section 2.7.7, *Proposed Annexation Areas*. The existing land use classifications define the basic categories of land use allowed in the City and are the basis for the zoning districts established in the Zoning Code.

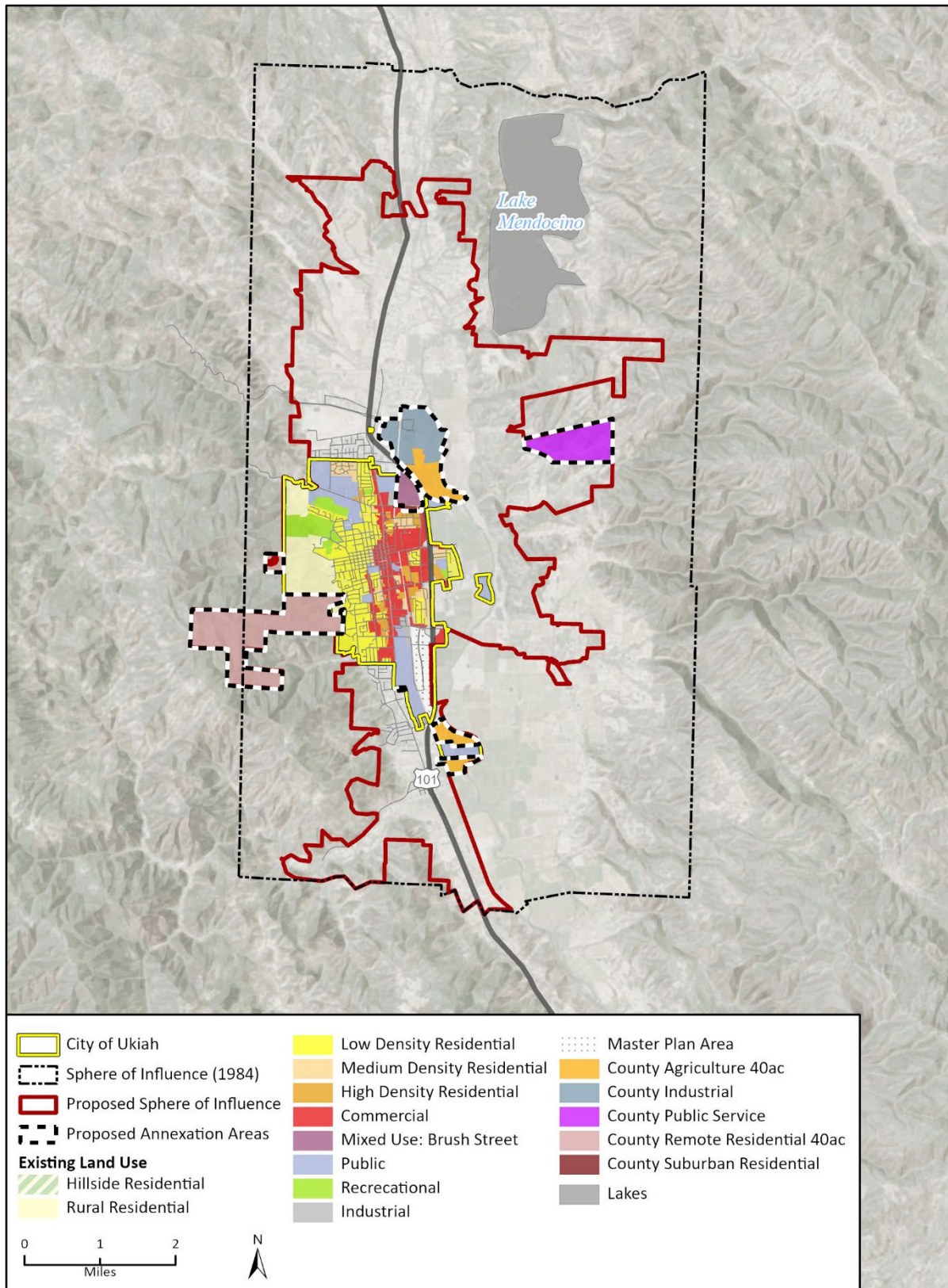


Figure 2-2 Existing and Proposed Sphere of Influence





**Figure 2-3 Existing Land Use Designations**



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Additional data provided by City of Ukiah, 2022.

(Division 9, Chapter 2 of the Ukiah City Code), which contain more specific regulations and standards governing development on individual properties.

## 2.6 Project Objectives

Ukiah 2040 is intended to function as a policy document to guide the City's long-term framework for future growth and resource management within the planning area through the year 2040. Based on community input and in recognition of the State's planning priorities, a vision and values supporting the vision for the community were developed. The vision and guiding principles of Ukiah 2040 are contained in the Introduction of Ukiah 2040 and are summarized below.

## 2.7 Project Characteristics

### 2.7.1 Community Vision

A vision statement is an aspirational description of what the community would like to be in the future. The vision provides the foundation for more specific goals, policies, and implementation programs to be developed later during the update process. The Ukiah City Council approved the following Vision Statement for Ukiah 2040 on March 3, 2021:

"The City of Ukiah is a diverse, family-oriented, and friendly community connected to the beautiful, surrounding natural open space areas that give the community its unique sense of place. Ukiah is a safe and resilient community that is fiscally responsible, environmentally conscious, and inclusive. The city offers a great place for people of all ages, incomes, and ethnicities to live, work, and visit."

### 2.7.2 Guiding Principles

The City of Ukiah developed guiding principles to expand on the main ideas contained in the vision statement. The following guiding principles express the key values and aspirations for Ukiah's future and serve as guideposts for the goals, policies, and implementation programs contained in Ukiah 2040:

- Guide land uses and development that meet the needs of the community, are environmentally conscious, and maintain Ukiah as a diverse, family-oriented, and friendly community, where people from all racial, ethnic and cultural backgrounds thrive socially, economically, academically, and physically.
- Ensure development in all neighborhoods is compatible with the unique characteristics and land use patterns and fosters a sense of place.
- Promote resilient and sustainable facilities and infrastructure to ensure delivery of high-quality services.
- Promote a diverse, local, business-friendly economy that fosters new job growth and is adaptable to changes in consumer habits and market trends.
- Maintain and advance a well interconnected circulation network that accommodates and encourages alternative modes of transportation that reduce congestion and encourage walkable and bikeable neighborhoods.
- Preserve existing open space resources while enhancing accessibility to parks and recreational amenities.

- Manage, conserve, and preserve the existing natural environment to ensure sustainable longevity for present and future generations.
- Provide for a safe community through resilient infrastructure, community-wide education and preparation, and hazard planning that is responsive to potential climate-related, natural, and human-caused disasters.
- Preserve Ukiah Municipal Airport as a vital economic driver and transportation system and maintain consistency with the criteria and policies of the Ukiah Municipal Airport Master Plan and Mendocino County Airport Land Use Compatibility Plan.
- Foster an inclusive community through conditions that allow for and stimulate a diversity of housing options for community members of all ages, incomes, and ethnicities.

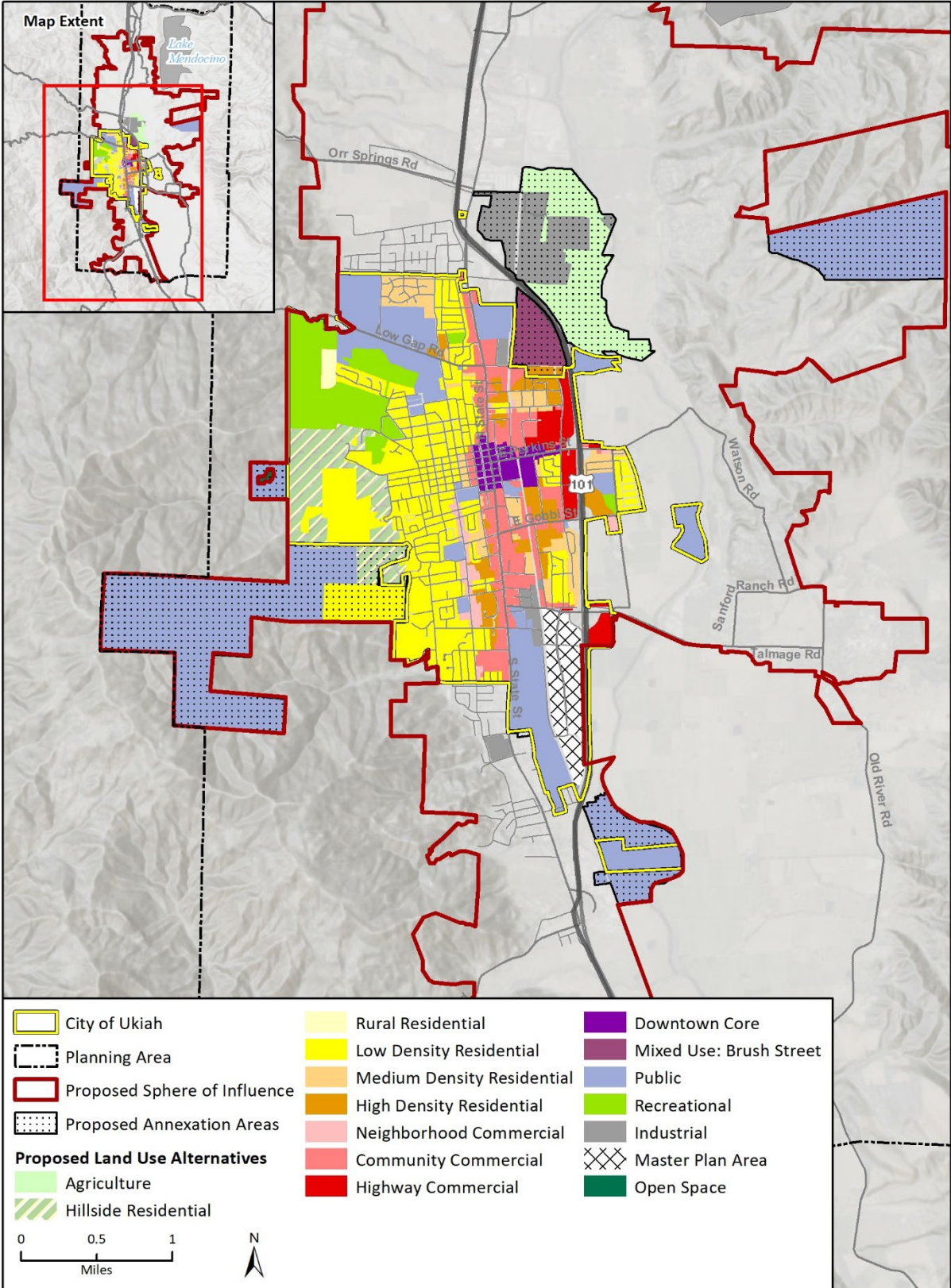
### 2.7.3 Ukiah 2040 Organization

Ukiah 2040 is comprised of seven elements, summarized as follows:

- **Land Use Element.** This element will consider current and proposed land use amendments, as depicted in Figure 2-4, below.
- **Economic Development Element.** This element will focus on goals and policies to promote and further economic development, job retention, and fiscal sustainability within Ukiah.
- **Agricultural Element.** This element will focus on goals and policies to conserve agricultural resources within Ukiah.
- **Mobility Element.** This element will address existing and planned vehicle, pedestrian, and bicycle infrastructure across the City.
- **Public Facilities, Services, and Infrastructure Element.** This element will focus on goals and policies related to public services, including but not limited to police, fire, airport, recreation, water/wastewater, and emergency services.
- **Environment and Sustainability Element.** This element will address the wide variety of parks, trails, and open spaces serving the diverse recreation needs of Ukiah residents, particularly youth, and emphasize the unique features of the City's natural environment. This element will also consider the effects of existing and planned development on natural resources located on public lands.
- **Hazards and Safety Element.** This element will cover seismic activity, other geologic hazards, fire hazards, hazardous materials, flooding, and other potential hazards, consistent with Government Code Section 65302(g). It will also address resiliency and risks from natural hazards in Ukiah, pursuant to SB 379. This element will also cover noise element requirements, consistent with Government Code Section 65302(f), including new existing noise contours as well as projected noise contours based on future traffic volumes projected to arise from improvements planned for in the Mobility Element.



Figure 2-4 Proposed Land Use Designation Amendments



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Additional data provided by City of Ukiah, 2022.

Fig. X Proposed LU Alternatives

## 2.7.4 Proposed Land Use Designations

The project would result in changes to the existing land use pattern in the City, as shown in Figure 2-4, below. Ukiah 2040 introduces new and expanded land use designations that provide a greater distinction between residential and commercial land use types and better align existing land uses with corresponding designations (City of Ukiah 2022). Specifically, the project divides the existing Commercial land use designation into more detailed designations: Downtown Core, Highway Commercial, Community Commercial, and Neighborhood Commercial. The project also introduces four new designations to the City's Land Use Map: Hillside Residential, Agriculture, Mixed Use: Brush Street Triangle, and Mixed Use: AIP-PD (City of Ukiah 2022). Table 2-1 provides a detailed description of each new land use designation included in Ukiah 2040. Overall, these land use designations define the basic categories of land uses allowed in the City but are implemented through the City's Zoning Ordinance and Zoning Map, which are part of the City's Municipal Code and contain more specific regulations and standards governing development on individual properties.

## 2.7.5 Planning Area

A general plan, pursuant to State law, must address all areas within the jurisdiction's Planning Area. The Planning Area encompasses all incorporated and unincorporated territory that bears a physical relationship to the long-term planning of the city. For Ukiah, the Planning Area is defined as the area that includes both the city limits and SOI, as well as the existing Ukiah Valley Area Plan boundary.

## 2.7.6 Proposed Sphere of Influence

The SOI can be generally defined as a city's ultimate probable boundary. The City of Ukiah's current SOI was adopted in 1984, is coterminous with the 2011 UVAP boundary, and reflects the City's previous intention to annex certain territories into the City limits (Ukiah 2022). As described in Section 2.3, *Project Location*, and shown in Figure 2-2, above, Ukiah 2040 would result in an update to the City's SOI. The SOI update is intended to reduce the City's ultimate probable boundary. The decision to update the City's SOI is based upon direction provided by the Ukiah City Council in January 2020.

## 2.7.7 Proposed Annexation Areas

As part of the proposed project, the City of Ukiah is pursuing three separate annexation areas currently located in the County of Mendocino's jurisdictional boundaries, totaling approximately 1,617 acres. Such annexations would support future housing needs through the orderly expansion of growth to avoid sprawl; collaboration between the cities within the County on regional housing through annexations of contiguous lands; and the need for preservation of open space and agricultural lands. The annexations have been previously described in the 1984 Ukiah General Plan, the 1995 Ukiah General Plan, the 2009-14, 2014-19, and 2019-27 Ukiah Housing Elements, Mendocino County's 2019-2027 Housing Element, and the 2011 Ukiah Valley Area Plan.

Furthermore, the Ukiah City Council adopted an Annexation Policy (Resolution No. 2020-06) in June 2020 that states that the City will pursue, apply for, and support the annexation of unincorporated areas to the City to avoid the negative consequences of continued urban sprawl and to ensure the efficient provision of municipal services to unincorporated areas without placing an undue financial burden on the City or its residents (City of Ukiah 2022). All annexation areas being pursued by the City are depicted in Figure 2-5, below.

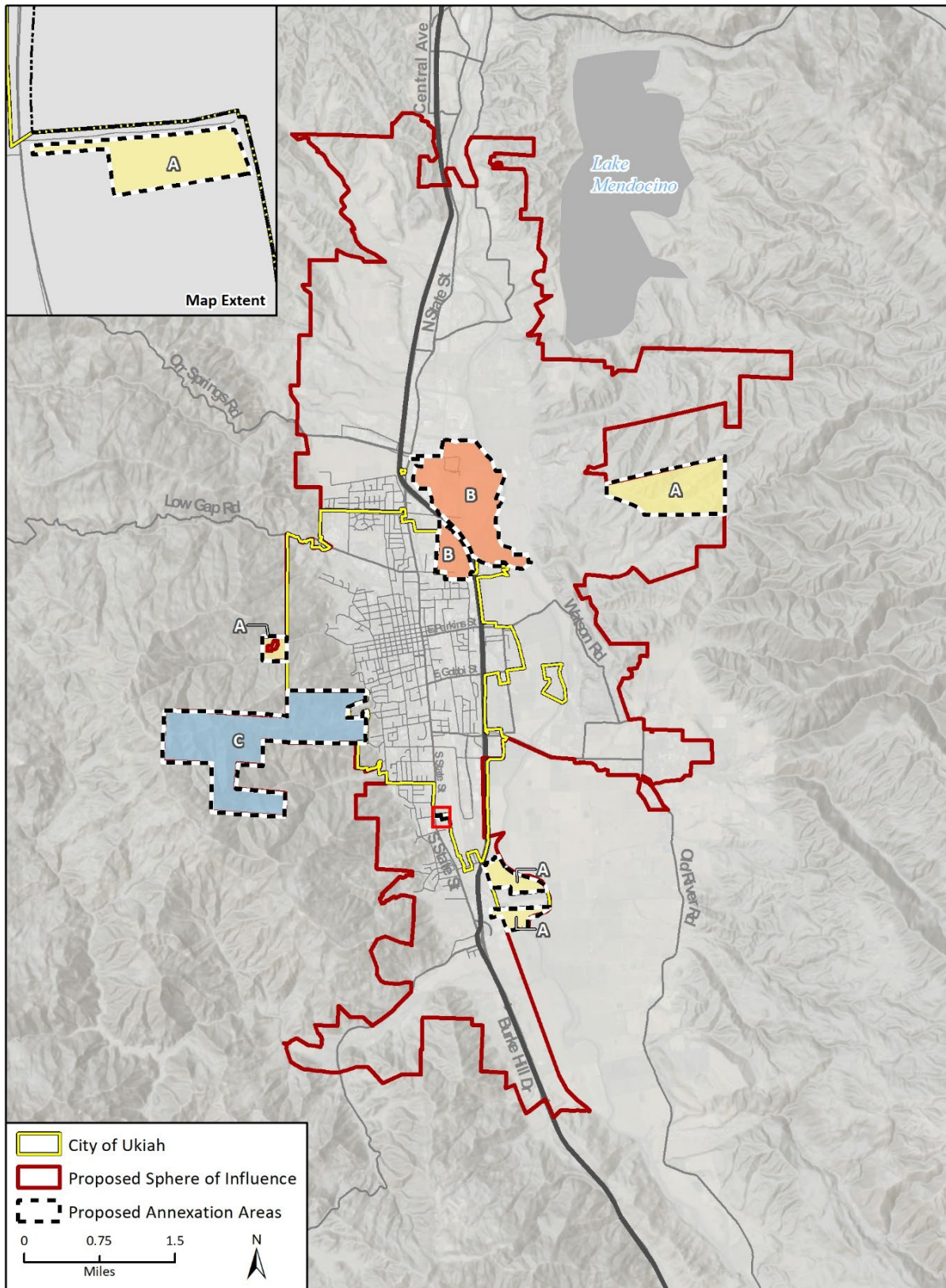
**Table 2-1 Description of Proposed Land Use Designations**

Land Use Designation	Description
Downtown Core	Designates areas within the Downtown Zoning District.
Highway Commercial	Designates commercial areas adjacent to U.S. Route 101. The purpose of this designation is to focus development of more auto-oriented uses, visitor-serving uses, and large format retail that are typically associated with highway users adjacent to U.S. Route 101.
Community Commercial	Designates major corridors for small and large format retail, shopping centers, chain restaurants, and personal services that provide for the community as well as consumers outside the city.
Neighborhood Commercial	Designates areas adjacent to existing lower density neighborhoods for small format retail and personal services that serve the everyday needs of the immediate neighborhood.
Hillside Residential	This designation replaces existing Rural Residential areas and some Low Density Residential areas with steep slopes in the hillsides west of Highland Avenue and Park Boulevard. This designation decreases residential density from two to one dwelling unit per acre. This density reduction does not conflict with Housing Element sites, does not preclude accessory dwelling units (in areas with less than 50 percent slope), and aligns with the goal of reducing residential construction in High Fire Hazard Areas.
Agriculture	This designation includes potential annexation lands north of Ukiah and land south of Ukiah. The Agriculture designation assumes the same development and density standards as stated in the Mendocino County General Plan (one dwelling unit per legal parcel at a minimum 40 acres).
Mixed Use: Brush Street Triangle	This designation encompasses lands with the area known as the Brush Street triangle that the City is seeking to annex. This is a current County designation that will be adopted by the City. This designation assumes the same development and density standards as stated in the Mendocino County General Plan (up to 20 units per acre for multifamily and up to 1.0 FAR for nonresidential uses).
Mixed Use: AIP-PD	This designation replaces the Master Plan Area designation for the Airport Industrial Park Planned Development (AIP-PD) area in southern Ukiah along Highway 101. The AIP-PD was adopted in 2013 and lands within this area are governed by AIP-PD Ordinance No. 1213.4 Since adoption of the 1995 General Plan this area is almost completely built out with a variety of commercial, industrial, and mixed use development. Land Use within this area is further broken down into seven land use categories: Highway Commercial; Industrial; Industrial Auto; Commercial; Light Manufacturing Mixed Use; Open Space; Professional Office; and Retail Commercial (as shown on the AIP-PD land use designation map). Each designation contains a set of development standards (setbacks, height, design, land use, landscaping, etc.). While the AIP-PD notes that residential density is limited to 60 people per acre, and commercial development is subject to 40% maximum lot coverage, due to its proximity to the airport, the AIP-PD relies on density restrictions noted within the Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP). Renaming the designation of this area would not change the land uses or development standards contained within the AIP-PD Ordinance.

Source: City of Ukiah 2022



**Figure 2-5 Ukiah 2040 Proposed Annexation Areas**



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Additional data provided by City of Ukiah, 2022.

Fig 2-5 Ukiah 2040 Annexation Areas



Annexation Area A consists of 16 City-owned properties located southeast, northeast, and west of the City, totaling approximately 437 acres. City-owned properties proposed for annexation include the landfill site on Vichy Springs Road, properties within the Ukiah Municipal Airport area along South State Street, properties within the vicinity of the City's Wastewater Treatment Plant along Norgard Lane, Taylor Drive and Plant Road, a property adjacent to the City's Solid Waste Transfer Station, and open space areas west of the terminus of Standley Street. Most of these properties currently host existing City operations. Once annexed, the Annexation Area A would continue to be used for agriculture, open space, or municipal uses. As such, these lands are proposed to be designated as Public and Open Space (City of Ukiah 2022). The City plans to expand their wastewater treatment facility; however, no plans have currently been developed and the exact location of the expansion is not currently known. Because the location of the expansion is not currently known, the environmental impacts of the expansion cannot be determined and future CEQA would be needed to determine the impacts of any future expansion.

Annexation Area B is comprised of the Bush Street Triangle/Masonite area north of the City and contains 63 properties, totaling approximately 473 acres. Development in this area includes some commercial, industrial, and manufacturing uses (both existing and decommissioned), as well as areas containing vacant and agricultural land. Once annexed, the Brush Street Triangle area would be designated as the new Mixed-Use: Brush Street Triangle designation, the Masonite area would be designated as Industrial, and the remaining area south of the Masonite site and north of Ford Road that is currently vacant and/or developed with agriculture uses would be designated as Agriculture (City of Ukiah 2022).

Annexation Area C is concentrated in the hills west of Ukiah. This area contains approximately 752 acres and a portion of that area (707 acres) is being pursued as part of the Western Hills Open Land Acquisition and Limited Development Agreement, approved by City Council on September 15, 2021. Approximately 640 acres of this land is currently preserved for open space conservation and is pre-zoned as Public Facilities. Approximately 54 acres of this land would allow for residential development through the creation of seven "Development Parcels," beginning at the terminus of Redwood Avenue. Parcels eligible for residential uses feature a Single-Family Residential – Hillside Overlay, allowing for a maximum of 14 units total (seven-single family homes and seven accessory dwelling units) upon annexation. Additionally, 14 acres of privately owned property was included in the Western Hills Open Land Acquisition and Limited Development Agreement for access to the project parcels. These parcels currently provide access to the project and are also proposed for annexation. Although these parcels are pre-zoned as Single-Family Residential – Hillside Overlay for consistency with surrounding zoning and land uses, they are not included in the Development Agreement and no further development is proposed or expected. However, these parcels could conceivably be developed with two residential units in the future, bringing the total potential buildout of Annexation Area C to 16 units. No new parcels would be created as a result of this annexation request. Finally, approximately 44 acres of private property are included in Annexation Area C to address existing LAFCo policies and known mapping errors, and to avoid the formation of an unincorporated island. The median size of these privately owned parcels is .94 acres, as the majority are unincorporated remnants of lots already developed within the City along Lookout Drive. Given the limited access and significant topographical constraints, development of these fragments and island parcels is unlikely, and there is no expectation that they can be feasibly developed. As these additional parcels are privately owned, the application of a Public Facilities zoning designation is inappropriate. Therefore, a Single-Family Residential - Hillside Overlay was applied to these fragment and island parcels for consistency.

### 2.7.8 Project Buildout

Ukiah 2040 designates land uses defining the type and amount of development that can occur throughout the City and proposed annexation areas through the planning horizon year of 2040 (over approximately 18 years). Ukiah 2040 also includes increased residential densities (number of units) and building intensities (floor area ratio [FAR]) for certain land use designations compared to the existing density and intensity thresholds. Development projections for the project were determined by analyzing vacant and underutilized parcels with the buildout capacity potential that is allowed under the applicable updated land use designations, the incorporation of annexation areas being pursued by the City of Ukiah, and the development of mixed-use designated areas anticipated under Ukiah 2040. Based on the potential land use changes, the project has a maximum buildout potential of an additional 2,350 housing units and an additional 4,514,820 non-residential square footage (City of Ukiah 2022). This buildout is an estimate of maximum buildout and is used as a conservative assumption in the environmental analysis of this EIR. While Ukiah 2040 would facilitate development, the development of the various land uses associated with Ukiah 2040 would occur over an extended period and would depend on factors such as local economic conditions, market demand, and other financing considerations. For example, a future developer may choose to develop a site at a density lower than what is allowed, or a vacant lot could remain vacant for several years until a development is identified for that property. For these reasons, the maximum buildout is an estimate and is not intended to predict the amount of development that will occur in the City in the future. Furthermore, this buildout is projected to occur specifically within the existing City limits and Annexation Areas. Overall, Ukiah 2040 would promote infill development; the redevelopment of abandoned, obsolete, or underutilized properties; and the adaptation of existing residential units to support multi-family use. Future development within the remaining SOI and Planning Area will be analyzed under CEQA on a project-level basis.

## 2.8 Intended Use of this EIR

This EIR provides a programmatic environmental review of the implementation of Ukiah 2040. Subsequent activities falling under the project will utilize this EIR to focus the individual environmental review of such consequent activities and to determine their effects. If a new project is proposed that is not anticipated by Ukiah 2040, or that may result in project-level environmental effects not addressed in this program-level EIR, the future proposed project would be evaluated as required under CEQA. This EIR is not intended to prohibit consideration of future proposed projects or CEQA analysis of any future proposed projects.

## 2.9 Project Implementation

Following adoption of the project by the Ukiah City Council, all subsequent activities and any future development within the City would be guided by the goals and policies contained in Ukiah 2040. Therefore, Ukiah 2040 provides specific policy guidance for the implementation of plan concepts. The City of Ukiah would also be required to coordinate with Mendocino County and other public agencies to implement policies that affect their respective jurisdictions or the overall region. Implementing these policies in accordance with new development (residential, commercial, or industrial) would be subject to the City's established review and approval processes, with final review and approval by the appropriate departmental staff as well as the appointed and elected officials. The principal responsibilities that City officials and staff have for project implementation are briefly summarized below:

- Updating the City of Ukiah Zoning Ordinance to achieve consistency with the adopted Ukiah 2040;
- Rezoning properties, as dictated by future development proposals;
- Approving tentative maps, variances, conditional use permits, and other land use permits and entitlements;
- Approving development agreements and issuance of related permits and approvals consistent with the Ukiah 2040;
- Analyzing and planning for public infrastructure such as roadway improvements, other capital improvements, and natural/capital resource preservation and/or restoration; and,
- Conducting or considering further focused planning studies, as appropriate to future development in the City.
- Submitting applications for annexation to the Mendocino Local Agency Formation Commission.

## 2.10 Required Discretionary Approvals

Pursuant to recommendations from the Planning Commission, the Ukiah City Council will need to take the following discretionary actions in conjunction with the project:

- Certification of the Final EIR
- Approval and adoption of Ukiah 2040

In addition, the Mendocino County LAFCo will need to approve the City's annexations and SOI changes, and the Board of Forestry and Fire Protection will review the Safety Element and respond to the City with its findings regarding the uses of land and policies in State Responsibility Areas (SRAs) or Very High Fire Hazard Severity Zones (VHFHSZs) that would protect life, property, and natural resources from unreasonable risks associated with wildfires, and the methods and strategies for wildfire risk reduction and prevention within SRAs or VHFHSZs. The Mendocino County Airport Land Use Commission (ALUC) will also review Ukiah 2040 for consistency with the UKIALUCP.

## 3 Environmental Setting

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This section provides a general overview of the environmental setting for the project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

### 3.1 Regional Setting

The City of Ukiah is located along U.S. Highway 101 in Mendocino County, which lies within the Northern Coast of California. Mendocino County spans the Coast Ranges, a group of northwest-southeast oriented mountain ranges with intervening canyons and valleys. Mendocino County's climate is characterized by annual temperatures averaging up to 58 degrees Fahrenheit (°F) and annual rainfall averaging up to 45 inches (County of Mendocino 2008).

Ukiah sits approximately 26 miles east of the Pacific Ocean, 45 miles north of Healdsburg and 35 miles south of Laytonville. The nearest major city to Ukiah is Santa Rosa, located approximately 60 miles south, while the larger urban centers of San Francisco and Sacramento are located approximately 100 miles south and southeast of Ukiah, respectively. The City is generally bounded by rolling hills to the west, the Russian River and rolling hills to the east, and the Redwood Valley to the north (City of Ukiah 2020). Figure 2-1 in Chapter 2, *Project Description*, shows the regional location of Ukiah.

### 3.2 Physical Setting

#### 3.2.1 General Geographic Setting

The City of Ukiah encompasses approximately 4.6 square miles (3,071 acres) and is the largest of four incorporated cities in Mendocino County (City of Ukiah 2020). Several small unincorporated communities surround the City within the greater Ukiah Valley, including El Roble approximately 1.75 miles south, Vichy Springs approximately 1.5 miles east, The Forks approximately 1.5 miles north, and Calpella approximately 4.25 miles north. Mendocino College is also located approximately 1.5 miles north of Ukiah, and the tribal lands of the Guidiville Rancheria and Pinoleville Rancheria are located to the east and north of the City, respectively.

U.S. Highway 101 is a major north-south freeway in Mendocino County that traverses the eastern portion of the City, generally providing two travel lanes in each direction through Ukiah. U.S. Highway 101 provides regional access to major employment and residential centers in Mendocino County, Humboldt County to the north, and Sonoma County to the south. Mendocino Transit Authority (MTA) is a commuter bus line that serves Mendocino County through a variety of fixed routes along U.S. Highway 101, State Route (SR) 1, SR-12, SR-20, SR-128, and SR-253 between Santa Rosa and Fort Bragg. MTA provides connections to Sonoma County Transit, Golden Gate Transit, Lake Transit, and Santa Rosa CityBus (MTA 2022).

According to the City of Ukiah General Plan Update Existing Conditions Workbook and Trends (2020), approximately 33 percent of development within the City of Ukiah is considered residential and is comprised of single-family homes, multi-family developments, and mobile home parks. Public and Quasi-Public uses, including care facilities, churches, schools, shelters, and government-owned

property, make up approximately 19 percent of development within the City. Approximately 12 percent of development in the City is considered commercial uses, much of which is concentrated along Main and State Streets and near U.S. Highway 101, while approximately 10 percent of land uses are designated for parks and open spaces (City of Ukiah 2020).

### 3.2.2 Topography and Drainage

The City of Ukiah is located within the Ukiah Valley where the underlying geologic structure is primarily characterized by unconsolidated clay, silt, sand, and gravel (Caldwell 1965). The landscape of Ukiah is generally flat along its central portion, ranging from approximately 600 feet above mean seal level (amsl) at its southern extent to approximately 660 feet amsl at its northern extent. The hillsides flanking the City to the west can reach up to 2,650 feet amsl, while the hillsides flanking the City to the east can reach up to approximately 3,400 feet amsl. Ukiah is located within the Upper Russian River Valley watershed. Creeks and streams offer some drainage channels in the region, but the majority of surface runoff and waters washed from the hillside slopes generally enter the City's stormwater systems that ultimately drain into the Russian River, which then drains to the Pacific Ocean (Mendocino County 2011).

### 3.2.3 Climate

The City of Ukiah enjoys a temperate Mediterranean climate characterized by hot, dry summers and mild, moist winters. The hottest months in Ukiah span between June and August while the coolest months in Ukiah span between November and February. July is the hottest month of the year with an average temperature high of 91°F. December is the coldest month of the year with an average temperature low of 37°F. Ukiah receives most of its precipitation during the months of October through April, though rainfall is most heavily concentrated between December and February (US Climate Data 2022).

## 3.3 Demographics

The City of Ukiah was incorporated in 1876 and was designated as the seat of Mendocino County. The City was slow-growing and relatively isolated during its early history but became much more accessible to the region and to the country following a railroad extension in 1889. Nonetheless, Ukiah remained slow growing until the end of World War II. The rapid growth following the war has been attributed to the overall growth of the logging industry in California's northern coasts, as the redwood forests to the north of Ukiah became increasingly valuable for lumber. When the logging industry grew, it began supporting an increase in employment and growth in the region. Today, Ukiah remains designated as the county seat and is the largest city in Mendocino County (City of Ukiah 2020).

In more recent years, Ukiah's population has remained stable. The 2010 U.S. Census determined the population of Ukiah was 16,075 residents. In the years following, Ukiah's population decreased below 16,000 residents before growing to an estimated population of 16,296 in 2019. Between the years of 2010 and 2019, Ukiah's average growth rate was 0.15 percent annually (City of Ukiah 2020).

As detailed in the City of Ukiah General Plan Update Existing Conditions Workbook and Trends (2020), the median population age in the City was 34.8 years old in 2017. This median age is down from 35.9 in 2010. Such a change can be attributed to an increased percentage of young adults in the City, which indicates that young families are moving to Ukiah. Comparatively, the median age in the Mendocino County was 41.5 years old in 2010 and 42.4 years old in 2017. Ukiah also retains a

high percentage of working age residents between 25 and 54, which makes up nearly 42 percent of the population combined (City of Ukiah 2020).

The City of Ukiah consists of a mixed racial demographic. Approximately 57.3 percent of residents identify as White, while approximately 32.7 percent of residents identify as Hispanic or Latino. This, too, differs from Mendocino County, where approximately 24.5 percent of the population identifies as Hispanic or Latino. In addition, approximately 30 percent of Ukiah residents speak a primary language other than English, which is higher than the 22 percent of Mendocino County residents who speak a primary language other than English (City of Ukiah 2020). The median household income in the City was \$43,480 in 2017, which is slightly lower than the countywide median income of \$46,528 and significantly lower than the statewide median income of \$67,169 in the same year (City of Ukiah 2020).

As of 2022, household size in the City of Ukiah was 2.4 persons per household (DOF 2022). There were an estimated 6,955 housing units in Ukiah in 2022, consisting of 3,765 single detached units; 436 single attached units; 889 two to four unit homes; 1,405 five plus unit homes; and 460 mobile homes (DOF 2022).

### 3.4 Cumulative Development

The California Environmental Quality Act (CEQA) defines cumulative impacts as two or more individual actions that, when considered together, are considerable or will compound other environmental impacts. Cumulative impacts are the changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be insignificant when analyzed separately but could have a significant impact when analyzed together. Cumulative impact analysis allows an EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

Because the project is a general plan update, cumulative impacts are treated somewhat differently than would be the case for a project-specific development. *CEQA Guidelines* Section 15130 provides the following direction relative to cumulative impact analysis and states that the following elements are necessary for an adequate discussion of environmental impacts:

A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

By its nature, a general plan considers cumulative impacts insofar as it considers cumulative development that could occur within the City limits and Annexation Areas. For example, the transportation analysis considers the overall change in vehicle miles travelled (VMT) due to implementing several development projects that would add to the Ukiah 2040 buildout. As such, the analysis in this EIR considers the cumulative impacts in the City due to implementing Ukiah 2040. These cumulative VMT calculations are accounted for in the air quality, energy, greenhouse gas emissions, and noise analyses; therefore, these analyses would also be considered cumulative.

Other impacts, such as geology and soils and cultural resources, are site specific and would not result in an overall cumulative impact from growth outside of the City. Therefore, the analysis of project impacts in this EIR also constitutes the cumulative analysis.

## 4 Environmental Impact Analysis

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This section discusses the possible environmental effects of Ukiah 2040 for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. A “significant effect” as defined by the *CEQA Guidelines* Section 15382:

means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection, identifies the methodologies used and the “significance thresholds,” which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*. The Executive Summary of this EIR summarizes all impacts and mitigation measures that apply to the project.

Ukiah 2040 contains four geographic elements: the Planning Area, the proposed sphere of influence (SOI), the City limits, and the Annexation Areas. Ukiah 2040 proposes land use changes within the



City limits and Annexation Areas, which can result in buildout. As such, the analysis of environmental impacts in this EIR is focused in these areas.

Information about the setting within the Planning Area and proposed SOI are provided for informational purposes but because Ukiah 2040 does not include new or amended land use designations to the proposed SOI and Planning Area, development within these areas for the purpose of this analysis is assumed to be consistent with current development patterns and buildout opportunities. Therefore, impacts within the Planning Area and proposed SOI are not discussed further in this EIR. While specific project-level impacts to the SOI and Planning Area are not analyzed in detail throughout this EIR, impacts from future projects in accordance with existing zoning and land use regulations within these areas would likely be similar to those analyzed within this EIR. For example, ground disturbing activities discussed within Section 4.4, *Biological Resources* would also apply to projects of similar nature within the SOI and Planning Area. Projects within these areas may use this EIR for tiering and streamlining purposes if they are consistent with the impacts analyzed herein. However, if future projects within these areas propose land use or zoning changes, or development that is not consistent with current allowable development intensities as well as impacts analyzed within this EIR, additional CEQA, such as a Subsequent EIR may be required.

## 4.1 Aesthetics

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This section analyzes the impacts to aesthetics, including impacts to scenic vistas, scenic resources visible from a state scenic highway, visual character and quality, and impacts arising from the possible introduction of new sources of light and glare due to the project.

### 4.1.1 Setting

#### **a. Definitions**

Most communities identify scenic resources as important visual assets that contribute to community identity. These resources can include landforms, trees, water features, and the built environment as far as they enhance and define the visual character of a landscape. Scenic resources include natural and open spaces, as well as the built environment, particularly if certain architecture is of historic or artistic value.

Visual quality is defined as the overall visual impression or attractiveness of an area based on the scenic resources, both natural and built. The attributes of visual quality include variety, vividness, coherence, uniqueness, harmony, and pattern. Viewshed is a term used to describe a range of resources and their context that relate to what people can see in the immediate environment in terms of foreground, middle ground, and background distances.

Impacts to visual quality are perceived by different viewer types and to different degrees, depending on the viewer exposure. Different land uses, such as open space or commercial districts, derive value from the quality of their settings and, for the purposes of this study, include regionally designated scenic highways, city gateways, and surrounding land features. Viewers driving in the city might be exposed to the dramatic hills on either side of Ukiah as they travel. Their exposure would vary based on proximity and ability to see the viewshed. The importance of scenic resources corresponds to viewer sensitivity. This sensitivity is determined by two measures: exposure and awareness. Exposure is the relative proximity of potential viewers to a given project implemented under Ukiah 2040 and awareness indicates the attention and focus viewers bring to the experience of the area. For example, tourists visiting the area to enjoy views of the hills are presumed to have a higher level of sensitivity to the visual quality than would commuters or workers driving equipment in the course of their daily work.

#### **b. Existing Visual Conditions**

Located in the Ukiah Valley, the City of Ukiah is the county seat and largest city in Mendocino County, known for strong retail and service industries, as well as a bustling tourism industry. The Ukiah Valley is approximately nine miles long and runs north to south, comprising more than 40,000 acres along U.S. Highway 101. The Russian River follows the Ukiah Valley, winding through agricultural lands just outside of Ukiah to the east. The valley is approximately 630 feet in elevation, with the hills of the Mendocino and Mayacamas ranges that flank the valley reaching up to 3,000 feet in elevation (City of Ukiah 2020).

The Ukiah Valley is well known for its natural and scenic beauty. Once called the “Gateway to the Redwoods,” Ukiah is a short drive from Montgomery Woods and Jackson State Forest, which contain some of the largest redwood forests in California. Redwood trees grow natively in the city, and on the hillsides above the Ukiah Valley (City of Ukiah 2020).

Views on the Valley floor within the City of Ukiah include those typical of existing residential and commercial development, as most of the land within the City limits is developed. The information below includes a discussion of the existing visual conditions at locations in the Planning Area with high visual quality.

## **Ridgelines**

The Mayacamas Mountains form the eastern horizon of the city, and the Mendocino Range forms the western horizon, with Cleland Mountain (2,447-foot elevation) and Lookout Peak (2,726-foot elevation) to the west being the highest nearby peaks. These mountains and associated ridgelines and hillsides (collectively referred to as the “western hills”) are visible from streets, parks, open spaces, and public buildings throughout the existing City limits. For example, the ridgelines of the Mendocino Range form a prominent background from Todd Grove Park on Live Oak Avenue, looking west through the trees, as shown in Figure 4.1-1.

At the eastern edge of the Planning Area, travelers on U.S. Highway 101 have expansive views of nearby tree-dotted rolling hills, with the Mayacamas Mountains in the horizon, as shown in Figure 4.1-2. As travelers move south on U.S. Highway 101, views of agricultural land and vineyards become more predominant, as shown in Figure 4.1-3.

**Figure 4.1-1 Example View of Ridgelines from Live Oak Avenue/Todd Grove Park looking West**



Source: Google Earth 2022

**Figure 4.1-2 Example View of Mayacamas Mountains from U.S 101 looking East**



Source: Google Earth 2022

**Figure 4.1-3 Example View of Vineyards and Ridgelines from U.S 101 looking East**



Source: Google Earth 2022

## **Scenic Vistas**

Views of scenic vistas are accessible from multiple points throughout the Planning Area. Mill Creek Park, located in a narrow canyon at the foot of Cow Mountain on the eastern side of Ukiah Valley, offers scenic vistas of wooded hills, wildflowers, and the Ukiah Valley, as shown in Figure 4.1-4. The Cow Mountain Recreation Area, located in the Mayacamas Mountains, offers recreational trails and scenic vistas of the Ukiah Valley, as shown in Figure 4.1-5. The City View Trail, an approximately 1.5-mile path that winds through Ukiah's western hills and leads to existing trails in Low Gap Park, also offers scenic vistas of the Ukiah Valley, as shown in Figure 4.1-6 (City of Ukiah 2020). Specific to resources within the City limits, one of the most notable scenic resources are the western hills, rising above the valley floor on the west side of Ukiah.



**Figure 4.1-4 View from Mill Creek Park, looking West**



Source: Google Earth 2022

**Figure 4.1-5 View from Cow Mountain Recreation Area, looking West**



Source: Google Earth 2016

**Figure 4.1-6 View from City View Trail, looking East**



Source: Google Earth 2021

### **c. Scenic Corridors**

Scenic corridors provide an opportunity for the public to take advantage of the natural environment's aesthetic value. Scenic corridors typically pertain to roadways and visible lands outside the roadway right-of-way. California's Scenic Highway Program designates scenic highways with the intention of protecting their corridors from change that would diminish the aesthetic value of adjacent lands. The California Department of Transportation (Caltrans) has designated the very northernmost portion of U.S. Highway 101 within the Planning Area as eligible for listing; however, there are no officially designated State scenic highways in the Planning Area (Caltrans 2019). Additionally, Ukiah has not designated any local roads as scenic corridors.

### **d. Light and Glare**

Existing development and motor vehicles in Ukiah produce light and glare. Primary sources of light are streetlights, parking lot lighting, and automotive headlights. Glare refers to the discomfort or impairment of vision experienced when a person is exposed to a direct or reflected view of a light source, causing objectionable brightness that is greater than that to which the eyes are adapted. General sources of glare include reflected sunlight from the windows of buildings, from automobiles, and from glass building facades.

## **4.1.2 Regulatory Setting**

### **a. Federal Regulations**

There are no federal regulations pertaining to aesthetics that are applicable to this analysis.

### **b. State Regulations**

Caltrans manages the State Scenic Highway Program, providing guidance and assisting local government agencies, community organizations, and citizens with the process to officially designate scenic highways. The State Scenic Highway Program is intended to "protect and enhance the natural scenic beauty of California highways and adjacent corridors, through special conservation treatment" (Caltrans 2020). Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. Suitability for designation as a state scenic highway is based on vividness, intactness, and unity of the view, as described in *Visual and Aesthetics Review* (Caltrans 2022).

Vividness is the extent to which the landscape is memorable. This is associated with the distinctiveness, diversity, and contrast of visual elements. A vivid landscape makes an immediate and lasting impression on the viewer. Intactness refers to the integrity of visual order in the landscape and the extent to which the natural landscape is free from visual intrusions, such as buildings, structures, equipment, and grading. Unity describes the extent to which development is sensitive to and visually harmonious with the natural landscape.

No officially designated scenic highways occur in the Planning Area. A portion of U.S. Highway 101, in the very north of the Planning Area is eligible for designation.

## c. Regional and Local Regulations

### Design Guidelines

#### *Design Guidelines for Commercial Projects within the Downtown Design District*

In May 1992, the City of Ukiah adopted the Design Guidelines for Commercial Projects within the Downtown Design District, which generally encompasses the State Street frontage between Brush Street and Talmage Road, as well as Perkins and Gobbi street frontages between U.S. Highway 101 and the downtown area, and portions of School, Dora and Oak streets adjacent to City Hall. Under these guidelines, new buildings should be compatible with the character of the existing viewscape in terms of building height, massing, setbacks, and design character. Additionally, new development should contribute to the visual quality and cohesiveness of its setting but need not imitate or mimic adjacent development. Reconstruction, repairs, or alterations to existing structures should preserve as much of the original building's character as possible by using original materials (City of Ukiah 1992). Generally, these guidelines provide requirements for the following:

- Site planning, including parking, pedestrian orientation, and compatibility with existing development
- Roofs, facades, and store front openings
- Sign design
- Street and site furnishings
- Pedestrian circulation and lighting
- Landscape design, including plant species and parking lot landscaping

#### *Design Guidelines for Commercial Projects outside the Downtown Design District*

In 1996, the Design Guidelines for Commercial Projects within the Downtown Design District were augmented to apply to commercial development projects outside the existing Downtown Design District. This set of guidelines is intended to assist the City with implementation of the General Plan's Community Design Element, provide design guidance and criteria for commercial development, and provide unity and integrity in the commercial areas outside the Downtown core (City of Ukiah 1996). Generally, these guidelines provide requirements for the following:

- Site planning, including parking, pedestrian orientation, and compatibility with existing development
- Building design, including architecture, building colors and materials, and lighting
- Sign design
- Outdoor storage and service areas
- Landscaping, including parking lots, fences and walls, and screening

#### *Airport Industrial Park Planned Development (AIP-PD) Development Standards*

The Airport Industrial Park Planned Development (AIP-PD) was adopted in 2013 for the area in southern Ukiah along (west of) U.S. Highway 101. Lands within this area are governed by AIP-PD Ordinance No. 1213.4. Since adoption of the 1995 General Plan this area has become almost completely built out with a variety of commercial, industrial, and mixed-use development. Land Use within this area is further broken down into seven land use categories and each designation contains a set of development standards (setbacks, height, pedestrian facilities, circulation, design,

land use, landscaping, etc.). All development within the AIP-PD currently requires discretionary review.

## **Ukiah City Code**

The Ukiah City Code contains ordinances that govern design and provide standards for new development and renovations in the city. Ukiah City Code Section 1169 states that the City's Design Review Board shall review proposed site development applications (as defined in Section 9261), and work with applicants to ensure design consistency with the Ukiah General Plan, Zoning Code, and Design Review Guidelines.

### *Downtown Zoning Code*

In 2012, the Ukiah City Council adopted the Downtown Zoning Code, a form-based code for the downtown area (Ordinance 1139). One of the main purposes of the Downtown Zoning Code (contained within Article 18 of the City's Zoning Code) is to create an urban environment that implements and fulfills the objectives and strategies of the 1995 General Plan to facilitate the coexistence of a wide range of mixed uses in proximity within a downtown urban environment. It is also intended to manage the scale and general character of new development to emulate the best elements of Ukiah's heritage, such as shady downtown streets, diverse architecture, mixed-use shopfront buildings in the downtown, and the architecture of historic civic buildings. This is accomplished through several design and development standards (siting and design, density, architecture, tree preservation, historic structure preservation, landscaping, circulation, etc.) contained within the Downtown Zoning Code.

### *Objective Design and Development Standards for Ministerial Residential Development*

In 2021, the Ukiah City Council adopted Objective Design and Development Standards for New Residential Construction (Ordinance 1212) which have been codified in Ukiah City Code Section 9055. Specifically, Ukiah City Code Section 9055.1 establishes objective development standards for new residential construction, including lighting, landscaping, orientation, and setback standards. Ukiah City Code Section 9055.2 establishes objective design standards for new residential construction, including color palette, screening, roof design, and structural massing standards. The purpose of these standards is to create a by-right, ministerial approval process for all new residential construction, excluding single-family homes. To do so, this article sets forth objective design and development standards that remove barriers to and reduce costs for new residential construction, excluding single-family homes, while still protecting the residential character of the City's neighborhoods.

## **4.1.3 Impact Analysis**

### **a. Significance Thresholds and Methodology**

According to Appendix G of the *CEQA Guidelines*, impacts related to aesthetics from implementation of the project would be significant if it would:

1. Have a substantial adverse effect on a scenic vista;
2. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;



3. In non-urbanized areas, substantially degrade 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; or
4. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Aesthetics impacts assessments involve qualitative analysis that is subjective but informed by the basic guidelines provided above. Reactions to the same aesthetic conditions vary according to viewer taste and interests. The project is an update to the General Plan and not a specific development proposal. This analysis, therefore, focuses on a general discussion of the aesthetic impacts in Ukiah, in terms of the arrangement of built space to open space, the density and intensity of development, and how new development visually fits with the existing landscape characteristic of the area. The impacts on visual character or quality attributable to development facilitated by Ukiah 2040 were evaluated relative to visual conditions under buildout. Photographs of the City were reviewed in preparation of this analysis, along with Google Earth imagery.

## b. Project Impacts and Mitigation

<b>Threshold 1:</b> Would the project have a substantial adverse effect on a scenic vista?
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**Impact AES-1      DEVELOPMENT FACILITATED BY THE PROJECT MAY IMPACT SCENIC VISTAS; HOWEVER, COMPLIANCE WITH UKIAH 2040 PROPOSED GOALS AND POLICIES, UKIAH CITY CODE, AND THE CITY'S DESIGN GUIDELINES WOULD ENSURE THAT NEW DEVELOPMENT DOES NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON SCENIC VISTAS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

A scenic vista is a view from a public place (roadway, designated scenic viewing spot, etc.) that is expansive and considered important. It can be seen from an elevated position (such as from a public trail on the top of a hillside) or from a roadway with a longer-range view of the landscape. An adverse effect would occur if development facilitated by Ukiah 2040 would block or otherwise damage the scenic vista. Examples of scenic vistas in Ukiah include viewsheds of the adjacent mountains and Ukiah Valley, as described in Section 4.1.1, *Setting*, and illustrated in Figure 4.1-4 to Figure 4.1-6. Views of the ridgelines and vineyards are also available to people traveling on U.S. Highway 101.

The project would introduce several new land use designations within the City and Annexation Areas, which would change the intensity of development and allow for taller buildings, potentially affecting scenic vistas enjoyed from viewpoints throughout Ukiah. However, it is anticipated that development from Ukiah 2040 would largely constitute infill development on underutilized parcels throughout the city.

Commercial development would be required to conform to the City's various design guidelines, which specify massing, scale, placement, orientation, setbacks, landscaping, and other design features that would reduce impacts to scenic vistas. Residential development would also be required to conform to the City's zoning and development standards (such as setbacks, height, and density) intended to reduce land use conflicts and visual impacts. Specific to development within the western hills, the City's Hillside Overlay district (-H) requires discretionary approval for all residential development. One of the intentions of the -H district is to preserve outstanding natural physical features, such as the highest crest of a hill, natural rock outcroppings, major tree belts, etc. As such, the -H district contains additional standards for residential development such as larger lot

sizes, lower densities, and minimum requirements for open, natural land to remain undeveloped. Development within the –H district also includes submittal of the following: soil and geological reports, subsurface investigations, grading plans, vegetation reports, grading plans, hydrology reports, and structure elevations. All the aforementioned requirements would aid in reducing potential impacts to scenic resources within the western hills.

Additionally, the annexation of three areas into Ukiah, and subsequent development in annexation areas could potentially change scenic vistas of ridgelines and open space surrounding Ukiah. However, new development would adhere to Ukiah 2040 proposed goals and policies that would further protect scenic vistas from the City, Annexation Areas, and at its edges where the ridgelines and opens spaces are most visible. Applicable proposed goals and policies are as follows:

**Policy LU-6.2:** Hillside Development. The City shall require new development in hillside areas to minimize grading to retain a natural hillside setting. The City shall encourage clustered dwelling units in hillside areas and roadways to be designed to preserve the ecological and scenic character of the hillsides.

**Policy LU-7.1:** Development Pattern. The City shall ensure an orderly, contiguous development pattern that prioritizes infill development, phases new development, encourages compactness and efficiency, preserves surrounding open space and agricultural resources, and avoids land use incompatibilities.

**Policy LU-11.8:** Tree Preservation. The City shall encourage the preservation of trees on public and private property. Priority should be given to the preservation of trees considered significant due to their size, history, unusual species, or unique quality.

**Goal ENV-1:** Preserve open space land for the commercial agricultural and productive uses, the protection and use of natural resources, the enjoyment of scenic beauty and recreation, protection of tribal resources, and the protection from natural hazards.

**Policy ENV-1.2:** Open Space Management. The City shall manage and maintain City-owned open spaces to preserve the integrity of these public spaces.

Ukiah 2040 proposed goals and policies would ensure that development would generally maintain views of hillsides, ridgelines, and open spaces; that development would not infringe upon the scenic character of hillsides; and that trees throughout the city would be preserved when possible. Compliance with the City's design guidelines and zoning standards, as well as conformance with Ukiah 2040 proposed goals and policies would ensure that development facilitated by the project would not substantially adversely affect scenic vistas within the City and Annexation Areas. Impacts would be less than significant.

## **Mitigation Measure**

No mitigation measures would be required.

## **Significance After Mitigation**

Impacts would be less than significant without mitigation.

**Threshold 2:** Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

**Impact AES-2 THE PROJECT WOULD HAVE NO IMPACT TO SCENIC RESOURCES VISIBLE FROM A STATE SCENIC HIGHWAY.**

Given there are no officially designated state scenic highways within the City or the Annexation Areas, the project would not substantially damage scenic resources, such as trees, rock outcroppings, and historic buildings, visible from a state scenic highway. There would be no impact.

**Mitigation Measure**

No mitigation measures would be required.

**Significance After Mitigation**

Impacts would be less than significant without mitigation.

**Threshold 3:** Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

**Impact AES-3 IMPLEMENTATION OF THE PROJECT WOULD FACILITATE DEVELOPMENT IN PREVIOUSLY UNDEVELOPED AREAS THROUGH REZONING AND CHANGES TO LAND USE. SCENIC QUALITY WOULD BE PROTECTED THROUGH ADHERENCE TO CITY DESIGN GUIDELINES, UKIAH CITY CODE, AND IMPLEMENTATION OF UKIAH 2040 PROPOSED GOALS AND POLICIES THAT ADDRESS VISUAL QUALITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

As described in Section 4.1.1, *Setting*, Ukiah is a visually attractive city with scenic resources such as redwood covered hillsides, the Russian River, and valley flatlands. Within the city, neighborhoods are characterized by tree-lined streets and include a mix of single-family homes, 2- to 4-attached homes, and multifamily condominiums. Residential uses are primarily located in the western portion of the City, within the hillsides. Commercial uses are predominantly located along U.S. Highway 101 and State Street. Visual character is moderate to high throughout the City and Annexation Areas, due to consistent architectural style, tree and vegetation coverage, and views of the Russian River and adjacent mountains and ridgelines.

The overall vision of Ukiah 2040 would largely preserve the visual character in the City and Annexation Areas by prioritizing new development on vacant and underutilized parcels. However, the project would also include increased residential densities and building intensities for certain land use designations compared to existing density and intensity thresholds, as well as annexation of three separate areas, which has the potential to degrade visual character or quality. The project would result in changes to the existing land use pattern through the introduction of new and expanded land use designations, which could potentially alter Ukiah's visual character. Although implementation of these new land use designations may alter Ukiah's existing visual character, these designations would provide a greater distinction between residential and commercial land use types and better align existing land uses with corresponding designations (City of Ukiah 2022). Additionally, these new land use designations would be implemented through the City's Zoning

Ordinance, which is part of the City's Code; therefore, development under Ukiah 2040 would remain consistent with applicable zoning regulations.

The project would annex three separate areas, which could potentially change the visual character of Ukiah. Annexation Area A consists of City-owned properties located southeast, northeast, and west of the City; once annexed, this area would continue to be used for agriculture, open space, or municipal uses. Annexation Area B consists of the Brush Street Triangle/Masonite area north of the City; once annexed, the Brush Street Triangle area would be designated as the new Mixed-Use: Brush Street Triangle designation, the Masonite area would be used for industrial uses, and the remaining vacant area would be used for agriculture. Annexation Area C is in the hills west of Ukiah and is currently used for open space conservation; once annexed, this area would be used for public facilities and single-family residential development. Development in all annexation areas would be subject to the following applicable Ukiah 2040 proposed policies that govern visual quality:

**Policy LU-1.3:** Neighborhood Infill. The City shall encourage objectively designed infill developments that enhance neighborhood quality and respond to community input in the planning and design of infill projects or non-residential, neighborhood-serving uses.

**Policy LU-1.5:** Existing Neighborhoods. The City shall encourage all new multi-family residential development to comply with objective design and development standards.

**Policy LU-2.2:** Compatibility with Adjacent Uses. The City shall require new mixed-use development to be compatible with adjacent land uses, particularly residential uses, through site and architectural design techniques that establish transitions between uses and minimize negative impacts.

**Policy LU-3.2:** New Downtown Development. The City shall ensure new development in the Downtown is compatible with existing uses and enhances the character of the area.

**Policy LU-4.1:** High-Quality Building Design. The City shall encourage distinctive and high-quality commercial building design and site planning that respects the character of Ukiah.

**Policy LU-4.2:** Commercial Center Design. The City shall require new commercial centers to incorporate standards of site design, construction, buffering, and screening that objective compatibility development standards when located adjacent to residential neighborhoods.

**Policy LU-4.4:** Commercial Property Landscaping. The City shall require that landscaping on commercial properties be well maintained and encourage those commercial properties currently without landscaping to provide landscaping.

**Policy LU-5.2:** Industrial Design Standards. The City shall ensure that new industrial developments contribute to the overall attractiveness of the community through appropriate site design, architectural design, and landscaping.

**Policy LU-6.2:** Hillside Development. The City shall require new development in hillside areas to minimize grading to retain a natural hillside setting. The City shall encourage clustered dwelling units in hillside areas and roadways to be designed to preserve the ecological and scenic character of the hillsides.

**Policy LU-7.1:** Development Pattern. The City shall ensure an orderly, contiguous development pattern that prioritizes infill development, phases new development, encourages compactness and efficiency, preserves surrounding open space and agricultural resources, and avoids land use incompatibilities.

**Policy LU-8.4:** Reuse of Underutilized Property. The City shall encourage property owners to revitalize or redevelop abandoned, obsolete, or underutilized properties to accommodate growth.

**Policy LU-9.2:** Housing Types and Designs. The City shall support housing types and designs that increase density while remaining consistent with the building scale and character present in existing neighborhoods. This includes multi-family units or clustered residential buildings that provide relatively smaller, less expensive units within existing neighborhoods.

**Policy LU-11.1:** Commercial Character. The City shall update and maintain objective commercial design standards for all commercial land use designations, to enhance community character and encourage economic development.

**Policy LU-11.3:** Neighborhood Character. The City shall ensure that Zoning Code standards and design guidelines are reflective of neighborhood character and land use intensity, complement views from US 101.

**Policy LU-11.4:** Public Buildings and Spaces. The City shall ensure that all new public buildings and places are consistent with City design review guidelines and standards, designed to be attractive, safe, and serve the neighborhood needs, and conform to standards similar to those applied to private development.

**Policy LU-11.5:** Public Street Furniture. The Public Works Department shall establish public design standards for street furniture and landscaping that enhance the streetscape and general fabric of the City.

**Policy LU-11.8:** Tree Preservation. The City shall encourage the preservation of trees on public and private property. Priority should be given to the preservation of trees considered significant due to their size, history, unusual species, or unique quality.

Development in the City and Annexation Areas would be subject to Ukiah 2040 proposed policies, which would ensure development under Ukiah 2040 would be visually consistent with existing land uses and aesthetically pleasing. Development throughout the City would largely be infill projects on undeveloped or underutilized sites and would be subject to Ukiah 2040 proposed goals and policies intended to maintain and improve the visual character; specifically, policies LU-1.3, LU-7.1, and LU-8.4 would ensure that high-quality development occurs in infill areas. Development under Ukiah 2040 would adhere to these proposed policies as well as the City's Design Guidelines, further ensuring visual consistency.

The City's Design Guidelines and Ukiah 2040 proposed goals and policies would encourage urban design that coheres with the character of existing neighborhoods and encourages high-quality design throughout the City and Annexation Areas. In addition, as described in Impact AES-1, the City has several requirements for development within the western hills, to reduce potential impacts to scenic resources within the western hills. Conformance with regulations would ensure that development and redevelopment under Ukiah 2040 would be visually compatible with the city's overall form and that development would improve underutilized parcels through excellent architectural and landscape design. Implementation of Ukiah 2040 proposed goals and policies and conformance with existing Design Guidelines and zoning regulations in the Ukiah City Code would ensure that development implemented due to the project would retain the high-quality visual character in the city. Therefore, development facilitated by the project would not substantially degrade visual quality, and impacts would be less than significant.

### **Mitigation Measure**

No mitigation measures would be required.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation.

**Threshold 4:** Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

**Impact AES-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INTRODUCE NEW SOURCES OF LIGHT AND GLARE. WITH ADHERENCE TO EXISTING ORDINANCES THAT REGULATE LIGHT AND GLARE FOR NEW DEVELOPMENT, IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

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For purposes of this analysis, light refers to light emissions (brightness) generated by a source of light. Stationary sources of light include exterior parking lot and building security lighting; moving sources of light include the headlights of vehicles driving on roadways near the project site. Streetlights and other security lighting also serve as sources of light in the evening hours. Glare is defined as focused, intense light emanated directly from a source or indirectly when light reflects from a surface. Daytime glare is caused in large part by sunlight shining on highly reflective surfaces at or above eye level. Reflective surfaces are associated with buildings that have expanses of polished or glass surfaces, light-colored pavement, and the windshields of parked cars.

As described in Section 4.1.1, *Setting*, the City is a developed area with open space areas, agricultural areas and vineyards, and forested hills along the boundaries. The light levels in Ukiah are moderately high in the developed areas, with streetlights, exterior building lighting, and lighted signs contributing to the lighting levels. Development facilitated by the project would be subject to detailed City regulations that govern lighting, including Ukiah City Code Section 9225 (Site and Building Development Standards,) which requires lighting in all zones to be hooded or shielded so light or glare does not extend beyond the subject property, that glare is confined to the maximum extent feasible within the boundaries of the site, that nonessential lighting must be turned off after 11:00 p.m. (except as allowed by safety and security), and that light fixtures are directed downwards, away from adjoining properties and public right-of-way. Furthermore, development facilitated by the project would include the installation of street trees, as required by Ukiah City Code Section 9229, which would create shade and reduce the area in which parked cars would be subject to glare. Therefore, while the project would introduce new sources of light and glare to Ukiah compared to existing conditions, new exterior lighting associated with future projects would be regulated by the City's Code, and light and glare impacts would be less than significant.

### **Mitigation Measure**

No mitigation measures would be required.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation.

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## 4.2 Agricultural and Forestry Resources

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This section summarizes the setting for agricultural and forestry resources and analyzes the impacts related to agricultural and forestry resources due to the project.

### 4.2.1 Setting

#### **a. Agricultural Resources Setting**

##### **California Agriculture**

According to the California Department of Food and Agriculture (CDFA), over a third of the country's vegetables and two-thirds of the country's fruits and nuts are grown in California. In 2020, California's farms and ranches received \$49.1 billion in cash receipts for their output. This represents a 3.3 percent decrease in cash receipts compared to 2019. California agricultural exports totaled \$20.8 billion in 2020, a decrease of 2.8 percent from 2019. Top commodities for export included almonds, dairy and dairy products, pistachios, walnuts and wine (CDFA 2022).

##### **Important Farmlands**

The California Department of Conservation (DOC) develops Important Farmland Maps as part of its Farmland Mapping and Monitoring Program (FMMP) and includes the following definitions for Important Farmland (DOC 2019):

###### *Prime Farmland*

Land which has the best combination of physical and chemical characteristics for producing crops. It has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according to current farming standards.

###### *Farmland of Statewide Importance*

Farmland of statewide importance is land similar to prime farmland, but with minor shortcomings, such as greater slopes or with less ability to hold and store moisture. The land must have been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date.

###### *Unique Farmland*

Land of lesser quality soils used for the production of specific high economic value crops. It has the special combination of soil quality, location, growing season and moisture supply needed to produce sustained high quality or high yields of a specific crop when treated and managed according to current farming methods. It is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Examples of crops include oranges, olives, avocados, rice, grapes and cut flowers.



## Regional Agriculture

Agriculture is an important part of the economy in Mendocino County. The total gross agricultural value for all commodities produced in 2019 was approximately \$272 million, which represents a 15.3 percent decrease compared to the 2018 value of approximately \$321 million (Mendocino County 2020). Formalized agriculture within the Ukiah Valley began in the 1850s. Today Ukiah Valley is home to several productive agricultural activities, including organically produced crops and notable vineyards. The Valley's land consists of prime, fertile soils and benchlands highly productive for grapes. Presently, agricultural land within the region is mostly comprised of vineyards and pear orchards but also includes row crops and pasturelands.

Agricultural production has been an important part of the regional economy for generations and will continue to be a foundational component for decades to come. In addition to the economic benefits, agricultural lands provide a pastoral quality that helps define the character of the Ukiah Valley. To preserve this agricultural identity, the City has historically limited agricultural land under its jurisdiction to non-urban, agricultural uses. As shown in Figure 4.2-1, the Planning Area contains Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. Most of this Important Farmland is located at the north and south end of the proposed Sphere of Influence (SOI). In addition to Important Farmland, the Planning Area has Williamson Act Lands as shown on Figure 4.2-2.

## LAFCo and Farmland

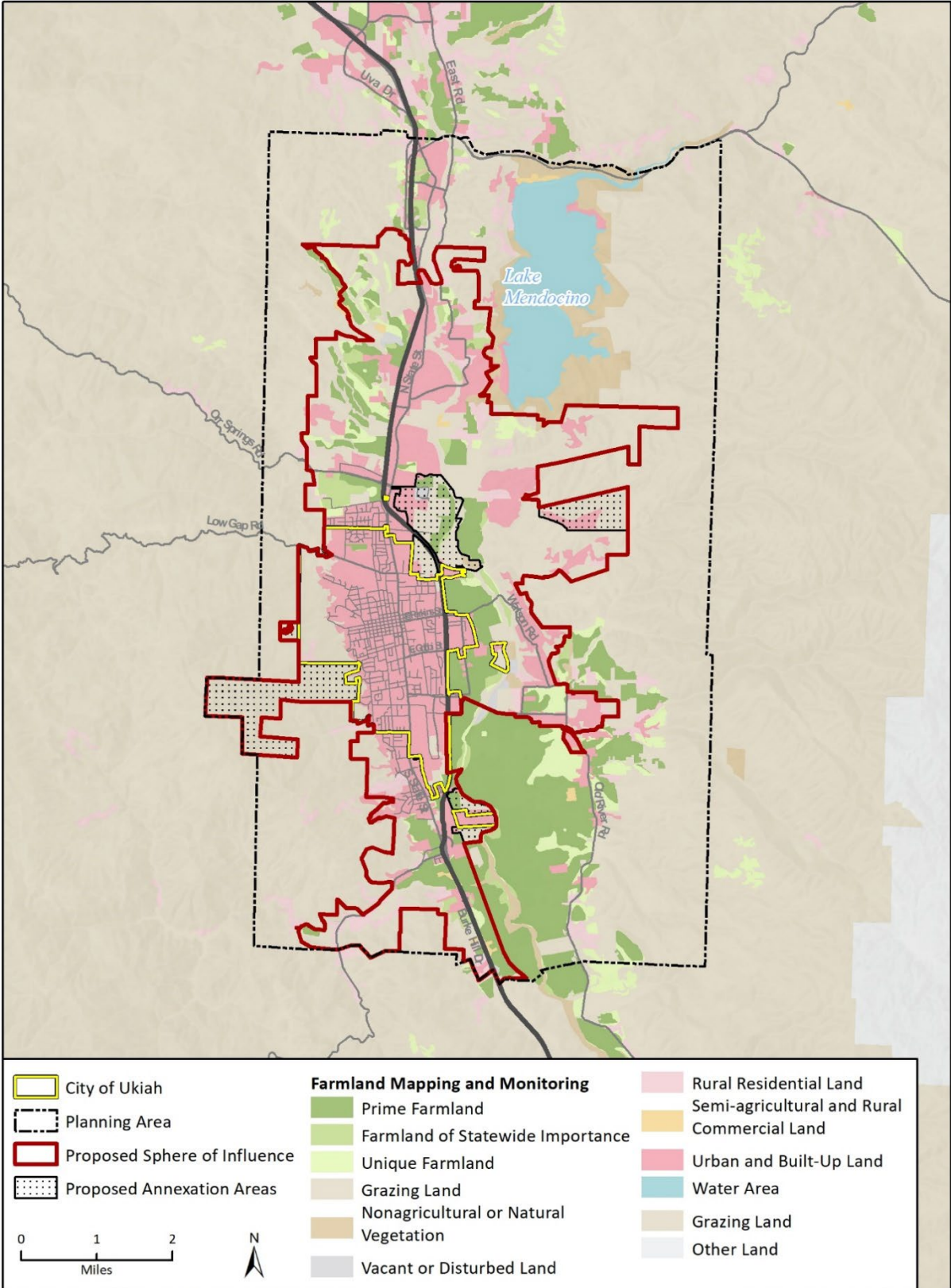
Preserving prime agricultural land is a key statutory mandate of the Mendocino Local Agency Formation Commission (LAFCo). As described in Section 1.5, *Lead, Responsible, and Trustee Agencies*, LAFCo is a Responsible Agency under the California Environmental Quality Act (CEQA). Federal, State, and local agencies, including Mendocino LAFCo, all operate under different laws and requirements, each setting out different definitions of prime farmland. The definition of agricultural lands and prime agricultural lands differ somewhat from the DOC definitions that are typically relied upon for CEQA analysis. Land that would not qualify as Prime under USDA or FMMP definitions of Prime, may qualify as Prime under the LAFCo definition. For example, grazing land meet the LAFCo definition of prime agricultural land. As shown on Figure 4.2-1, the Planning Area includes grazing lands.

## Regional Farmland Trends

Conversion of farmlands is the loss of farmlands due to development or land use changes that do not support agricultural production. The FMMP, which is updated biennially, provides land use conversion information for decision makers to use in their planning for the present and future of California's agricultural land resources.

According to the DOC, irrigated farmland in California decreased by 11,165 net acres between 2014 and 2016. Prime Farmland, the highest quality farmland, decreased by 18,312 net acres, coupled with a Farmland of Statewide Importance decrease of 26,557 net acres. Partially offsetting these losses was the addition of 33,704 net acres of irrigated crops on lesser quality soils, mapped as Unique Farmland (DOC 2017). Although this farmland conversion was partially caused by urbanization, long-term land idling was the largest factor contributing to irrigated land decreases over this period. Land idling, where irrigated land was converted to non-irrigated land due to a lack of irrigation over time or conversion to dry farming, was responsible for 85 percent of this type of farmland.

Figure 4.2-1 Farmland in the Planning Area

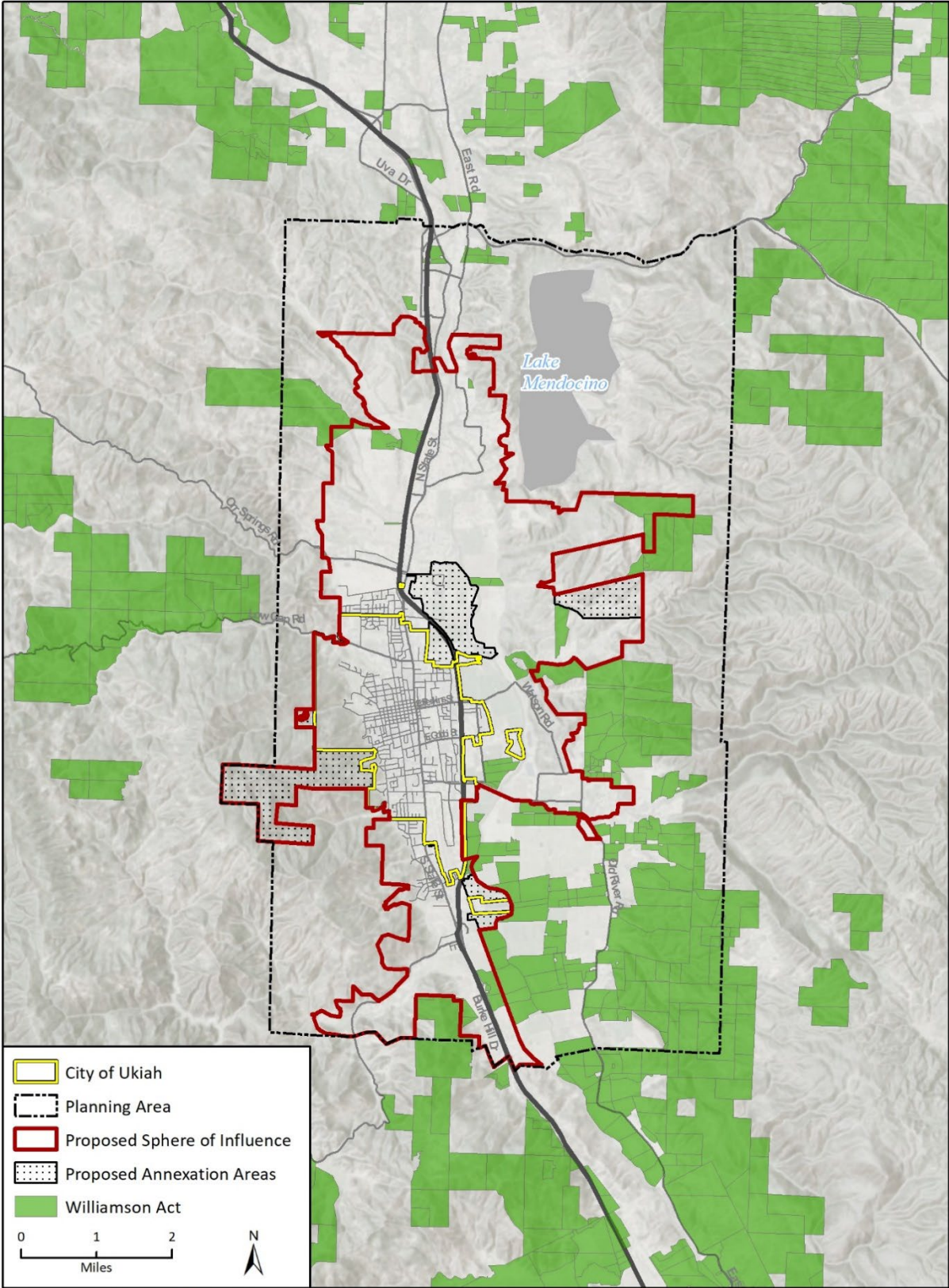


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Additional data provided by City of Ukiah, 2022.

Fig 4.2.1 Farmland Mapping and Monitoring Program



Figure 4.2-2 Williamson Act Contract Lands in the Planning Area



conversion. Irrigated land conversions due to idling are often associated with water resource limitations, market conditions, and salinity-related land idling. Land was removed from irrigated categories at a rate 17 percent lower than compared with the prior update (153,766 acres in 2014 and 128,105 acres in 2016) (DOC 2017).

Table 4.2-1 shows the number of acres that have been converted in Mendocino County from 2014 to 2016, the most recent data available. As shown, the County lost 1,394 acres of agricultural land and gained 788 acres, resulting in a net decrease of 606 acres.

**Table 4.2-1 Farmland Conversion in Mendocino County**

Farmland Designation	Total Acreage Inventoried 2014	Total Acreage Inventoried 2016	Total Acreage Inventoried Acres Lost (-)	Total Acreage Inventoried Acres Gained (+)	Total Acreage Inventoried Total Acreage Changed	Total Acreage Inventoried Net Acreage Changed
Prime Farmland	19,208	18,130	1,166	88	1,254	-1,078
Farmland of Statewide Importance	1,227	1,289	70	132	202	62
Unique Farmland	7,215	7,625	158	568	726	410
Farmland of Local Importance	0	0	0	0	0	0
<b>Important Farmland Subtotal</b>	<b>27,650</b>	<b>27,044</b>	<b>1,394</b>	<b>788</b>	<b>2,182</b>	<b>-606</b>

Source: DOC 2019

## b. Forestry Resources

### Forest Land, Timberland, Timber Production Zones

The Planning Area does not have any areas that are zoned for Forest Land or Timber Production Zones. There are associated lumber processing and industrial activities within the existing and proposed SOI, but those are located on industrially zoned lots and would not be affected by the project. Forestry resources include forestland, timberland, and timberland production zones. Definitions used for forestland and timberland are those found in the California Public Resources Code (PRC) Sections 12220(g) and 4789.2(g) and California Government Code (CGC) Section 51104(g). These codes define forestland, timberland, and timberland production zones as follows:

#### *Forest Land*

Forest land is land that can support, under natural conditions, 10 percent native tree cover of any species, including hardwoods, and that allows for the preservation or management of forest-related resources such as timber, aesthetic value, fish and wildlife, biodiversity, water quality, recreational facilities, and other public benefits (PRC Section 12220(g)).

#### *Timberland*

Timberland means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees

of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species are determined by the board on a district basis (PRC Section 4526(g)).

#### *Timberland Production Zones*

Timberland production zones or “TPZ” means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h) (CGC Section 51104).

### **Regional Forestry Resources**

Mendocino County ranked fourth in the state in timber volumes and produced roughly 8.5 percent of the state’s total timber harvest in 2019. Timber represents the second highest value commodity, with a gross “at mill” value of approximately \$110 million, a 17.3 percent decrease over a total of approximately \$133 million in 2018 (Mendocino County 2020). Slowing construction of new homes in 2018 lead to the 17.3 percent decrease in gross timber value over the previous year. As shown in Figure 4.2-3, there are no TPZs within the City or its existing or proposed SOI.

## **4.2.2 Regulatory Setting**

Various policies and regulations are enforced at the federal, state, and local level to protect agriculture, forestry, and timberland resources, as outlined below.

### **a. Federal Regulations**

#### **Farmland Protection Policy Act (FPPA)**

The FPPA is intended to minimize the impact Federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. It assures that to the extent possible federal programs are administered to be compatible with state, local units of government and private programs and policies to protect farmland. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a Federal agency or with assistance from a Federal agency.

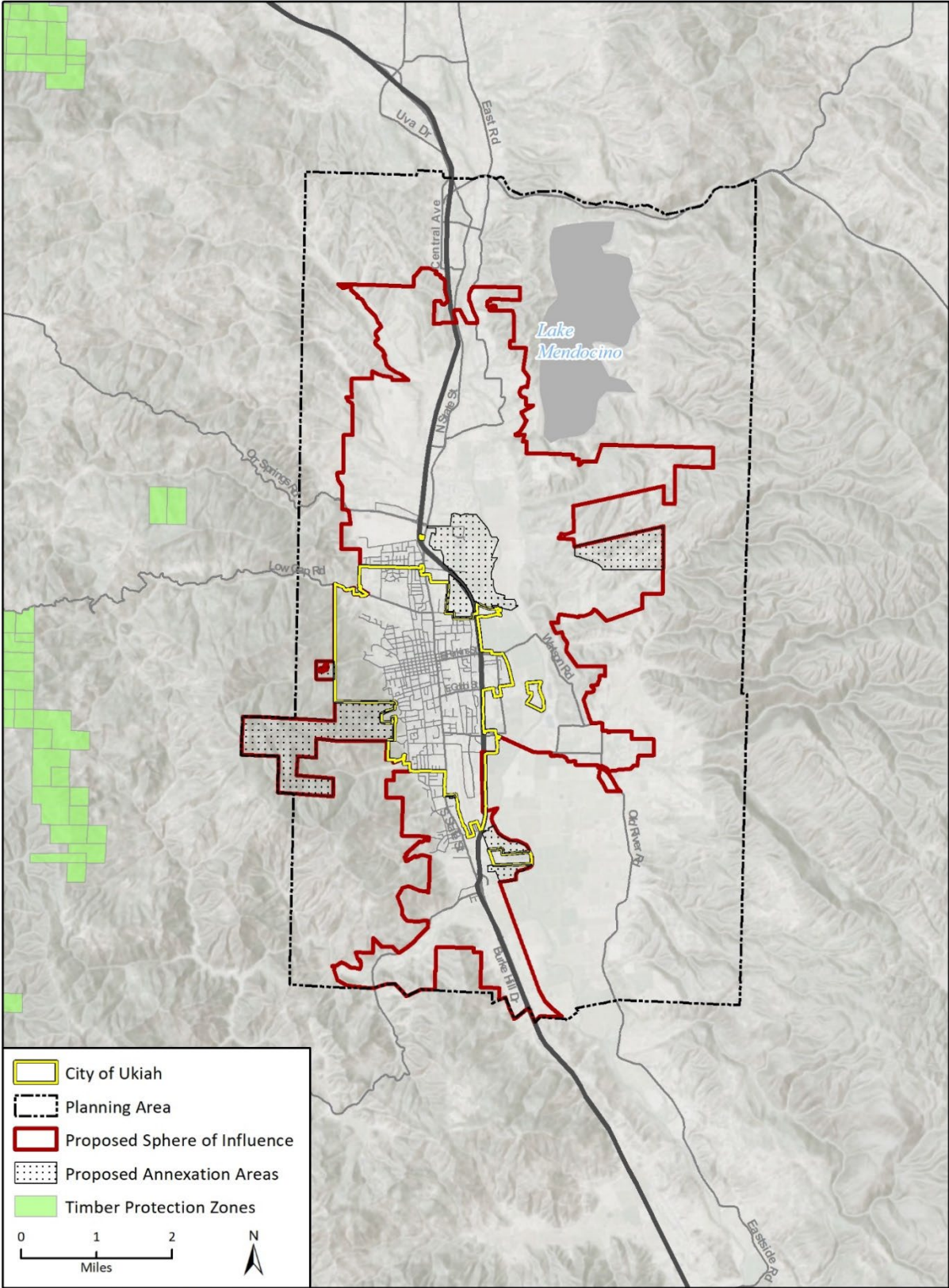
### **b. State Regulations**

#### **California Farmland Conservancy Program Act**

The California Farmland Conservancy Program Act, also known as Senate Bill (SB) 1142, established the California Farmland Conservancy Program, which provides grants for agricultural conservation easements. An agricultural conservation easement aims to maintain agricultural land in active production by preventing development on the subject parcel and prohibiting practices that would damage or interfere with the agricultural use of the land. Because the easement is a restriction on the deed of the property, the easement remains in effect even when the land changes ownership. While other benefits may accrue because the land is not developed (scenic and habitat values, for example), the primary use of the land is agricultural. Easements funded by the California Farmland Conservancy Program must be of a size and nature suitable for viable commercial agriculture.



Figure 4.2-3 Timber Production Zones in the Planning Area



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Additional data provided by City of Ukiah, Mendocino County 2022.

Fig X Timber Protection Zones

## **California Farmland Mapping and Monitoring Program**

The DOC, under the Division of Land Resource Protection, developed the FMMP to monitor the conversion of the state's farmland to and from agricultural use. Data is collected at the county level to produce a series of maps identifying eight land use classifications using a minimum mapping unit of 10 acres. The program also produces a biannual report on the amount of land converted from agricultural to non-agricultural use. The program maintains an inventory of state agricultural land and updates the "Important Farmland Series Maps" every two years (DOC 2016).

## **Right to Farm Act 1981**

The Right to Farm Act (Civil Code Section 3482.5) is designed to protect commercial agricultural operations from nuisance complaints that may arise when an agricultural operation is conducting business in a "manner consistent with proper and accepted customs." The code specifies that established operations that have been in business for 3 or more years that were not nuisances at the time they began shall not be considered a nuisance as a result of new land use.

## **Williamson Act**

The California Land Conservation Act of 1965, Sections 51200 et seq. of the California Government Code, commonly referred to as the "Williamson Act," enables local governments to restrict the use of specific parcels of land to agricultural or related open space use. Landowners enter into contracts with participating cities and counties and agree to restrict their land to agriculture or open space use for a minimum of ten years. In return, landowners receive property tax assessments that are much lower than normal because they are based upon farming and open space uses as opposed to full market (speculative) value.

## **Land Evaluation and Site Assessment Model**

The DOC also employs a land evaluation and site assessment model that incorporates that of the Federal model and adds factors to evaluate a given project's size, the soil resource quality at the project site, water resource availability, surrounding a soil resource quality, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. These factors are rated, weighted, and combined into numeric score that provides the basis for determining a project's potential significance relative to agricultural land conversion.

### **c. Local Regulations**

#### **The City of Ukiah General Plan (1995)**

The current Ukiah General Plan, adopted in 1995, does not include an Agriculture Element. The current General Plan contains policies related to agriculture, but they would be replaced by the proposed Ukiah 2040. The following goals, objectives and policies addressed in the Open Space and Conservation Element of the 1995 General Plan may be applicable to the project:

**Goal OC-2.** The City of Ukiah shall support the conservation of agricultural lands through formation of a land trust.

**Policy OC-2.1.** Support the formation of a non-profit private Land Conservation Trust.

**Goal OC-10.** Conserve the natural woodlands environment of the area hills.

**Policy OC-10.2.** Roads and structures shall be designed and sited to conserve or avoid damage to the natural hillside resources where feasible.

**Goal OC-11.** Conserve coastal oak woodlands in the hills.

**Policy OC-11.1.** Provide areas for development and areas for conservation in the hills.

**Goal OC-17.1.** Recognize agriculture as a basic industry in the Ukiah Valley.

**Policy OC-17.1.** The encroachment of incompatible uses into agricultural areas shall be avoided.

**Policy OC-17.2.** Utilize the Williamson Act as one means to promote conservation of agricultural lands.

**Policy OC-17.3.** Enact a right-to-farm ordinance consistent with the County's right-to-farm ordinance.

**Goal OC-18.** In concert with the County, preserve the economic viability of agricultural lands.

**Policy OC-18.1.** Investigate protective programs to conserve agricultural lands.

**Goal OC-19.** Maintain existing agricultural areas.

**Policy OC-19.1.** The large, contiguous areas presently classified for agriculture are to remain classified as agricultural land.

**Goal OC-20.** Allow agriculturally-compatible uses on non-viable agriculture lands.

**Policy OC-20.1.** Ensure that development parcels on which commercially-viable agriculture is not feasible is compatible with agricultural uses.

**Goal OC-21.** Support diversified farming for local benefits and food supply.

**Policy OC-21.1.** Organic farming shall be encouraged as an economic and knowledge resource, as well as to promote self-sufficiency of local food supply.

**Goal GP-30.** Protect existing agriculturally zoned lands in the City's Planning Area

**Policy GP-30.1.** Recognizing the irreversibility of conversion for agricultural to other uses, require within city limits and urge within the Planning Area that all such conversions be subject to a citizen review process.

**Policy GP-30.2.** Work cooperatively with citizens and organizations to ensure that the siting and design of schools, and local State and Federal facilities minimizes the use of, and impact on, agricultural lands.



### 4.2.3 Impact Analysis

#### a. Significance Thresholds and Methodology

##### Significance Thresholds

According to Appendix G of the CEQA Guidelines, impacts related to agricultural and forestry resources from implementation of the project would be significant if it would:

1. 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
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract
3. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))
4. Result in the loss of forest land or conversion of forest land to non-forest use
5. 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

##### Methodology

Agricultural and forestry impact assessments involved a review of data available through the Department of Conservation's FMMP maps, as well as County forest land and Williamson Act Land maps provided by the County of Mendocino. An adverse effect would occur if a proposed development would have an impact on existing, mapped agricultural or forest land.

#### b. Project Impacts and Mitigation Measures

<b>Threshold 1:</b>	Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
<b>Threshold 2:</b>	Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?
<b>Threshold 5:</b>	Would the project 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?

**Impact AG-1      DEVELOPMENT FACILITATED BY THE PROJECT IS DESIGNED TO ENCOURAGE THE CONTINUED OPERATION OF EXISTING AGRICULTURE IN AND SURROUNDING THE CITY. BUILDOUT OF THE PROJECT WOULD RESULT IN A DECREASE OF SEVEN ACRES OF DESIGNATED AGRICULTURAL LAND WITHIN THE PROPOSED ANNEXATION AREAS BUT WITH IMPLEMENTATION OF UKIAH 2040 GOALS AND POLICIES, IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

Important Farmland (i.e., Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) is mapped within City limits, Annexation A, and Annexation B. Important Farmlands are

not mapped within Annexation C; therefore, Annexation Area C will not be further analyzed within this discussion. In addition, there are no Williamson Act lands located within City limits or any of the Annexation areas; therefore, the project would not result in any impacts to Williamson Act lands and this topic is not discussed further.

Prime Farmland is mapped in Annexation Area A. Under Ukiah 2040, the area mapped as Prime Farmland would be designated as Public. Agricultural uses would be an allowed use under the Public designation and no Important Farmland would be lost. As such, conversion to non-agricultural use is not expected on these lands.

Prime Farmland and Farmland of Statewide Importance are mapped in Annexation Area B. Under Ukiah 2040, these areas would be designated as Agriculture. Ukiah 2040 identifies that “[l]ands within the AG classification with agricultural commodities, excluding cannabis, are protected from encroachment of incompatible uses by the "Right to Farm" provisions of the Agriculture Element.” As such, conversion to non-agricultural use is not expected on these lands.

Prime Farmland and Unique Farmland is mapped within City limits, in northern Ukiah. Under Ukiah 2040, this area would be designated as Public. Because agricultural uses would be an allowed use under the Public designation, no Important Farmland would be lost. In addition, Prime Farmland and Unique Farmland is mapped within City limits, on a lot owned by the City in southern Ukiah. Under Ukiah 2040, this area would be designated as Master Plan. No changes to the agricultural land use are expected from the application of this land designation.

In addition, grazing lands, which are considered agricultural lands by LAFCo are located throughout the City (mostly in the western portion of the City) and within Annexation Areas A, B, and C and within small portions of the City. For the annexation areas, the City’s new land use designations overall match the County’s land use designations and there would be no overall change between what is proposed by the City and what was designated by the County. Since there would be no overall change in land use designations, no loss of grazing lands is expected within the Annexation Areas. Within the City, grazing lands are expected to continue. Implementation of Ukiah 2040 is not expected to result in the conversion of grazing lands to non-grazing lands.

In summary, implementation of Ukiah 2040 is not expected to result in the conversion of agricultural uses to non-agricultural uses. In addition, the Agricultural Resources Element of Ukiah 2040 seeks to encourage the continued operation of agricultural lands in and around Ukiah. The goals and policies listed below from Ukiah 2040 address the preservation of agricultural lands:

**Goal AG-1:** To preserve and strengthen agricultural uses in and around Ukiah that influence the regional economy.

**Policy AG-1.1:** Reduce Agricultural/Urban Conflict. The City shall reduce conflict between incompatible uses and agriculture within and adjacent to the City.

**Policy AG-1.2:** Preserve Agricultural Lands. With the exception of presently proposed or approved subdivisions, the City shall discourage urban development on unincorporated land within its Sphere of Influence until annexed by the City. The City shall support County land use regulations that protect the viability of local agriculture in the Ukiah Valley.

**Policy AG-1.3:** Plan Together. The City shall identify and involve stakeholders, as well as advisors with knowledge and expertise, to create and implement a comprehensive planning framework that preserves and strengthens agricultural uses in and around Ukiah that inform and influence the regional economy.

The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor conflict with existing zoning for agricultural use, or a Williamson Act contract. In addition, development in accordance with the land use designations of Ukiah 2040 would reduce impacts on existing agricultural lands and the future preservation of agricultural lands within Ukiah. Therefore, impacts would be less than significant.

If a future project proposes to convert agricultural uses to non-agricultural uses, that future project would require additional CEQA review prior to the City's approval.

### **Mitigation Measures**

No mitigation measures would be required.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation.

<b>Threshold 3:</b>	Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
<b>Threshold 4:</b>	Would the project result in the loss of forest land or conversion of forest land to non-forest use?

**Impact AG-2      THE PROJECT WOULD NOT CONFLICT WITH EXISTING ZONING FOR FOREST LAND, TIMBERLAND, OR TIMBERLAND PRODUCTION, NOR RESULT IN THE LOSS OF FOREST LAND OR CONVERT FOREST LAND TO NON-FOREST USES. THERE WOULD BE NO IMPACT.**

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As shown on Figure 4.2-3, there are no zoned TPZs or forest lands within the City limits or annexation areas. Most timber resources in the region are located west of the City. There are associated lumber processing and industrial activities within the City, but those are located on industrially zoned lots. The Ukiah 2040 land use pattern would not result in rezoning of any existing forest land or timberlands within the City or Annexation Areas. Because no forest land or timber areas are within the City or Annexation Areas, there would be no impact on conversion of forest land or conflicts with land zoned for forest land, timberland, or timberland production.

### **Mitigation Measures**

No mitigation measures would be required.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation.

## 4.3 Air Quality

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This section summarizes the setting for air quality and analyzes the impacts related to air quality due to the project.

### 4.3.1 Setting

#### **a. Regional Climate and Meteorology**

Ukiah is located in Mendocino County, which is a subregion of the North Coast Air Basin (NCAB). The NCAB also includes the counties of Del Norte, Humboldt, Mendocino, and Trinity, along with the northern portion of Sonoma County. Mendocino County is bounded on the west by the Pacific Ocean; on the east by Tehama, Glenn, and Lake counties; on the south by Sonoma County; and on the north by Humboldt and Trinity counties.

Due to the proximity of the Pacific Ocean, the climate in Ukiah is Mediterranean, characterized by warm dry summers and cool moist winters. In summers, temperatures in Ukiah generally range from lows in the 50s and 60s to highs in the 90s (Fahrenheit). In winter, temperatures range from lows in the 30s to highs the 50s and 60s (Fahrenheit). The major large-scale weather feature controlling climate in the Ukiah region is a large high-pressure system located in the eastern Pacific Ocean, known as the Pacific High. During winter months, marine air trapped in the lower atmosphere is often condensed into fog by the cool Pacific Ocean. Stratus-type clouds usually form offshore and move into the area during the evening hours. During winter months, the Pacific High becomes weaker and shifts south, allowing weather systems associated with the polar jet stream to affect the region. Low pressure systems produce periods of cloudiness, strong shifting winds, and precipitation. Average rainfall in Ukiah is slightly less than 35 inches, with most precipitation falling during the winter (City of Ukiah 2021). Rainfall is often from brief, intense storms, which move in from the northwest. Virtually no rainfall occurs during the summer months. Winter cold-air inversions are common from November to February.

Prevailing winds are generally from the north. Prevailing strong summer winds come from the northwest; however, winds can come from the south and east under certain short-lived conditions. In early autumn, strong, dry offshore winds may occur for several days in a row, which may cause air pollution created in the Sacramento Valley, Santa Rosa Plain, or even San Francisco Bay Area to move into the Ukiah Valley (City of Ukiah 2021).

#### **b. Pollutants**

Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack). The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the United States Environmental Protection Agency (USEPA), and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for “criteria pollutants” and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide, volatile organic

compounds (VOC)/reactive organic gases (ROG),<sup>1</sup> nitrogen oxides (NO<sub>x</sub>), particulate matter with diameters of up to ten microns (PM<sub>10</sub>) and up to 2.5 microns (PM<sub>2.5</sub>), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROG and NO<sub>x</sub>. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog). The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants of primary concern.

## **Ozone**

Ozone is produced by a photochemical reaction (triggered by sunlight) between NO<sub>x</sub> and ROG. ROG are composed of non-methane hydrocarbons (with some specific exclusions), and NO<sub>x</sub> is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and nitrogen dioxide. NO<sub>x</sub> are formed during the combustion of fuels, while ROG are formed during combustion and evaporation of organic solvents. As a highly reactive molecule, ozone readily combines with many different components of the atmosphere. Consequently, high levels of ozone tend to exist only while high ROG and NO<sub>x</sub> levels are present to sustain the ozone formation process. Once the precursors have been depleted, ozone levels rapidly decline. Because these reactions occur on a regional rather than local scale, ozone is considered a regional pollutant. In addition, because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans, including changes in breathing patterns, reduction of breathing capacity, increased susceptibility to infections, inflammation of lung tissue, and some immunological changes (Bay Area Air Quality Management District [BAAQMD] 2017). Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

## **Carbon Monoxide**

Carbon monoxide is a localized pollutant that is found in high concentrations only near its source. The major source of carbon monoxide (a colorless, odorless, poisonous gas) is the incomplete combustion of petroleum fuels by automobile traffic. Elevated concentrations are usually only found near areas of high traffic volumes. Other sources of carbon monoxide include the incomplete combustion of petroleum fuels at power plants and fuel combustion from wood stoves and fireplaces during the winter. The health effects of carbon monoxide are related to its affinity for hemoglobin in the blood. Carbon monoxide causes several health problems, including aggravation of some heart diseases (e.g., angina), reduced tolerance for exercise, impaired mental function, and impaired fetal development. At high levels of exposure, carbon monoxide reduces the amount of oxygen in the blood, leading to mortality (BAAQMD 2017). Carbon monoxide tends to dissipate rapidly into the atmosphere; consequently, violations of the NAAQS and/or CAAQS for carbon monoxide are generally associated with localized carbon monoxide “hotspots” that can occur at major roadway intersections during heavy peak-hour traffic conditions.

## **Nitrogen Dioxide**

Nitrogen dioxide is a by-product of fuel combustion; the primary sources are motor vehicles and industrial boilers and furnaces. The principal form of NO<sub>x</sub> produced by combustion is nitric oxide,

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<sup>1</sup> CARB defines VOC and ROG similarly as, “any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate,” with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term ROG is used in this analysis.

but nitric oxide reacts rapidly to form nitrogen dioxide, creating the mixture of nitric oxide and nitrogen dioxide commonly called NO<sub>x</sub>. Nitrogen dioxide is an acute irritant that can aggravate respiratory illnesses and symptoms, particularly in sensitive groups (BAAQMD 2017). A relationship between nitrogen dioxide and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility (BAAQMD 2017). It can also contribute to the formation of PM<sub>10</sub> and acid rain.

## **Sulfur Dioxide**

Sulfur dioxide is included in a group of highly reactive gases known as “oxides of sulfur.” The largest sources of sulfur dioxide emissions are from fossil fuel combustion at power plants (73 percent) and other industrial facilities (20 percent). Smaller sources of sulfur dioxide emissions include industrial processes such as extracting metal from ore and the burning of fuels with a high sulfur content by locomotives, large ships, and off-road equipment. Sulfur dioxide is linked to several adverse effects on the respiratory system, including aggravation of respiratory diseases, such as asthma and emphysema, and reduced lung function (BAAQMD 2017).

## **Particulate Matter**

Suspended atmospheric PM<sub>10</sub> and PM<sub>2.5</sub> is comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. Both PM<sub>10</sub> and PM<sub>2.5</sub> are directly emitted into the atmosphere as by-products of fuel combustion, wildfire, and wind erosion of soil and unpaved roads. Particulate matter is also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with PM<sub>10</sub> and PM<sub>2.5</sub> can be very different. PM<sub>10</sub> is generally associated with dust mobilized by wind and vehicles while PM<sub>2.5</sub> is generally associated with combustion processes as well as formation in the atmosphere as a secondary pollutant through chemical reactions. PM<sub>2.5</sub> is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems (CARB 2022a). More than half of PM<sub>2.5</sub> that is inhaled into the lungs remains there. These materials can damage health by interfering with the body’s mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance. Suspended particulates can also reduce lung function, aggravate respiratory and cardiovascular diseases, increase mortality rates, and reduce lung function growth in children (BAAQMD 2017).

## **Lead**

Lead is a metal found naturally in the environment, as well as in manufacturing products. The major sources of lead emissions historically have been mobile and industrial sources. However, as a result of the U.S. EPA’s regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. The most dramatic reductions in lead emissions occurred prior to 1990 due to the removal of lead from gasoline sold for most highway vehicles. Lead emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least in part because of national emissions standards for hazardous air pollutants (USEPA 2014). As a result of phasing out leaded gasoline, metal processing currently is the primary source of lead emissions. The highest level of lead in the air is generally found near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. The health impacts of lead include behavioral and hearing disabilities in children and nervous system impairment (BAAQMD 2017).

## Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about 1/70<sup>th</sup> the diameter of a human hair) and thus is a subset of PM<sub>2.5</sub>. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2022b). DPM accounts for most of the cancer risk from air toxics in the region with mobile sources being one of the top contributors.

TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

### c. Existing Air Quality

The Ukiah E. Gobbi Street Monitoring Station (within the City of Ukiah) was used for ozone air quality data, the Ukiah County Library Street Monitoring Station (within the City of Ukiah) was used for PM<sub>2.5</sub> air quality data, and Cloverdale Monitoring Station (approximately 25 miles south of Ukiah) was used for PM<sub>10</sub> air quality data. Table 4.3-1 summarizes the representative annual air quality data for the Planning Area over the years 2018 through 2020 at the monitoring stations. As shown in Table 4.3-1, PM<sub>10</sub> measurements exceeded the CAAQS in 2018 and 2020, and exceeded the NAAQS in 2018. The PM<sub>2.5</sub> measurements exceeded the federal threshold in 2018 and 2020. No other standards were exceeded in the years 2018, 2019, or 2020.

**Table 4.3-1 Ambient Air Quality Data**

Pollutant	2018	2019	2020
Ozone (ppm), Worst 1-Hour <sup>1</sup>	0.075	0.062	0.088
Number of days of State exceedances (>0.09 ppm)	0	0	0
Ozone (ppm), 8-Hour Average <sup>1</sup>	0.060	0.054	0.062
Number of days of State exceedances (>0.07 ppm)	0	0	0
Number of days of Federal exceedances (>0.07 ppm)	0	0	0
Particulate Matter <10 microns, µg/m <sup>3</sup> , Worst 24 Hours <sup>2</sup>	271.6	45.5	10.2
Number of days above State standard (>50 µg/m <sup>3</sup> )	13	0	17
Number of days above Federal standard (>150 µg/m <sup>3</sup> )	2	0	0
Particulate Matter <2.5 microns, µg/m <sup>3</sup> , Worst 24 Hours <sup>3</sup>	263.2	21	117.7
Number of days above Federal standard (>35 µg/m <sup>3</sup> )	20	0	20

ppm = parts per million; µg/m<sup>3</sup> = micrograms per cubic meter

\* There was insufficient (or no) data available to determine the value.

<sup>1</sup> Measurements taken from the Ukiah E Gobbi Street Monitoring Station

<sup>2</sup> Measurements taken from the Cloverdale Monitoring Station

<sup>3</sup> Measurements taken from the Ukiah County Library Monitoring Station

Source: CARB 2022c

#### d. Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14, the elderly over 65, persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. Most sensitive receptor locations are therefore residences, schools, and hospitals.

### 4.3.2 Regulatory Setting

The Federal CAA governs air quality in the United States. In addition to being subject to federal requirements, air quality in California is also governed by more stringent regulations under the California CAA. At the federal level, the USEPA administers the CAA. The CAA is administered by the CARB at the state level and by the AQMDs at the regional and local levels. The Mendocino County Air Quality Management District (MCAQMD) regulates air quality at the regional level.

#### a. Federal and State Ambient Air Quality Standards

The federal and state governments have authority under the federal and state CAAs to regulate emissions of airborne pollutants and have established NAAQS and CAAQS for the protection of public health. Federal and state standards have been established for six criteria pollutants, including ozone, CO, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>, and Pb.

Air quality monitoring stations measure pollutant ground-level concentrations (typically, ten feet above ground level). Depending on whether the standards are met or exceeded, the local air basin is classified as in “attainment” or “non-attainment.” Some areas are unclassified, which means no monitoring data are available. Unclassified areas are in attainment. Table 4.3-2 lists the current federal and state standards for each of these pollutants as well as the attainment status of the NCAB. California air quality standards are identical to or stricter than federal standards for all criteria pollutants.

**Table 4.3-2 Federal and State Ambient Air Quality Standards**

Pollutant	Averaging Time	California Standards		National Standards	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone	8 Hour	0.070 ppm	A	0.070 ppm	A
	1 Hour	0.09 ppm	A		
Carbon Monoxide	8 Hour	9 ppm	A	9 ppm	A
	1 Hour	20 ppm	A	35 ppm	A
Nitrogen Dioxide	1 Hour	0.18 ppm	A	0.100 ppm	U
	Annual Arithmetic Mean	0.030 ppm		0.053 ppm	A
Sulfur Dioxide	24 Hour	0.04 ppm	A	0.14 ppm	A
	1 Hour	0.25 ppm	A	0.075 ppm	A
	Annual Arithmetic Mean			0.030 ppm	A
Particulate Matter (PM <sub>10</sub> )	Annual Arithmetic Mean	20 µg/m <sup>3</sup>	N		
	24 Hour	50 µg/m <sup>3</sup>	N	150 µg/m <sup>3</sup>	U



Pollutant	Averaging Time	California Standards		National Standards	
		Concentration	Attainment Status	Concentration	Attainment Status
Particulate Matter - Fine (PM <sub>2.5</sub> )	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	A	12 µg/m <sup>3</sup>	U/A
	24 Hour	35 µg/m <sup>3</sup>	N		
Sulfates	24 Hour	25 µg/m <sup>3</sup>	A		
Lead	Calendar Quarter			1.5 µg/m <sup>3</sup>	A
	Rolling 3 Month Average			0.15 µg/m <sup>3</sup>	
	30 Day Average	1.5 µg/m <sup>3</sup>			A
Hydrogen Sulfide	1 Hour	0.03 ppm	U		
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm	No information available		
Visibility Reducing particles	8 Hour (10:00 to 18:00 PST)		U		

A=Attainment N=Nonattainment U=Unclassified; mg/m<sup>3</sup>=milligrams per cubic meter ppm=parts per million, µg/m<sup>3</sup>=micrograms per cubic meter

Source: CARB 2020

Local control in air quality management is provided by CARB through county-level or regional (multi-county) air districts. CARB establishes statewide air quality standards and is responsible for control of mobile emission sources, while the local air districts are responsible for enforcing standards and regulating stationary sources. CARB has established 15 air basins statewide. The City of Ukiah is in the NCAB, the southern portion of which is under the jurisdiction of MCAQMD.

CARB and the USEPA established ambient air quality standards for major pollutants, including ozone, CO, NO<sub>2</sub>, SO<sub>2</sub>, Pb, and PM<sub>10</sub> and PM<sub>2.5</sub>. Standards have been set at levels intended to be protective of public health. California standards are more restrictive than federal standards for each of these pollutants except for lead and the eight-hour average for CO. The local air districts are required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. As the local air quality management agency, the MCAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

## b. Federal Regulations

The USEPA is responsible for enforcing the federal CAA. The USEPA is also responsible for establishing the NAAQS. The NAAQS are required under the 1977 CAA and subsequent amendments. The EPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. The agency has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission standards established by the CARB.

## c. State Regulations

In California, CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the State requirements of the federal CAA, administering the California

CAA, and establishing the CAAQS. The California CAA, as amended in 1992, requires all air districts in the state to endeavor to achieve and maintain the CAAQS. The CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride and visibility reducing particles. CARB regulates mobile air pollution sources, such as motor vehicles. The agency is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local Air Pollution Control Districts, which in turn administer air quality activities at the regional and county level.

#### **d. Regional Regulations**

##### **Mendocino County Air Quality Management District – Particulate Matter Attainment Plan**

The MCAQMD is responsible for assuring that the federal and state ambient air quality standards are attained and maintained in the southern NCAB. MCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, as well as many other activities.

MCAQMD adopted the Particulate Matter Attainment Plan in January 2005 (MCAQMD 2005). The Particulate Matter Attainment Plan includes control measures that are intended to achieve the attainment goals. Control measures include encouraging the installation of EPA-certified woodstoves, development of an impact fee for large campground operators, supporting pavement of existing unpaved roads, and prohibiting outdoor burning. The Particulate Matter Attainment Plan also includes requiring permits for new construction that disturbs over one acre of land, along with enforcement of existing air quality regulations.

##### **2017 Clean Air Plan**

BAAQMD adopted the *2017 Clean Air Plan* on April 19, 2017, as an update to the 2010 Clean Air Plan. The 2017 Clean Air Plan, which focuses on protecting public health and the climate, defines an integrated, multi-pollutant control strategy that includes all feasible measures to reduce emissions of ozone precursors (including transport of ozone and its precursors to neighboring air basins), PM, and TAC. To protect public health, the control strategy will decrease population exposure to PM and TACs in communities that are most impacted by air pollution, with the goal of eliminating disparities in exposure to air pollution between communities (BAAQMD 2017). MCAQMD defers to BAAQMD guidelines for CEQA review of projects in Mendocino County (MCAQMD 2013).

### **4.3.3 Impact Analysis**

#### **a. Significance Thresholds and Methodology**

##### **Significance Thresholds**

According to Appendix G of the *CEQA Guidelines*, impacts related to air quality from implementation of the project would be significant if it would:

1. Conflict with or obstruct implementation of the applicable air quality plan;
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard;
3. Expose sensitive receptors to substantial pollutant concentrations; or
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

#### *Mendocino County Air Quality Management District Thresholds*

MCAQMD defers to BAAQMD guidelines for CEQA review of projects in Mendocino County (MCAQMD 2013). Therefore, this analysis uses the BAAQMD's 2017 *CEQA Air Quality Guidelines* to evaluate air quality. The plan-level thresholds specified in the 2017 BAAQMD *CEQA Air Quality Guidelines* were used to determine whether the project impacts exceed the thresholds identified in Appendix G of the *CEQA Guidelines*.

#### *Construction Emissions Thresholds*

BAAQMD's May 2017 *CEQA Air Quality Guidelines* do not have plan-level significance thresholds for construction air pollutant emissions. However, they do include the individual project-level thresholds for temporary construction-related and long-term operational emissions of air pollutants. Future projects under the plan that are subject to CEQA review would be subject to the project-level construction thresholds or screening criteria. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the San Francisco Bay Area Air Basin's or NCAB's existing air quality conditions (BAAQMD 2017a). Therefore, construction emissions associated with plan implementation are discussed qualitatively to evaluate potential air quality impacts.

#### *Operational Emissions Thresholds*

BAAQMD's 2017 *CEQA Air Quality Guidelines* contain specific operational plan-level significance thresholds for criteria air pollutants. Plans must show the following over the planning period:

- Consistency with current air quality plan control measures
- Vehicle miles traveled (VMT) or vehicle trips increase is less than or equal to the plan's projected population increase

If a plan can demonstrate consistency with both criteria, then impacts are considered less than significant.

## **Methodology**

#### *Construction Emissions*

Construction-related emissions are temporary but may still cause adverse air quality impacts. Construction of development associated with the project would generate temporary emissions from three primary sources: the operation of construction vehicles (e.g., scrapers, loaders, dump trucks, etc.); ground disturbance during site preparation and grading, which creates fugitive dust; and the application of asphalt, paint, or other oil-based substances. At this time, there is not sufficient detail to allow project-level analysis and thus it would be speculative to analyze project-level impacts.

Rather, construction impacts for the project are discussed qualitatively and emissions are not compared to project-level thresholds.

### *Operational Emissions*

Based on plan-level guidance from the BAAQMD 2022 *CEQA Air Quality Guidelines*, long-term operational emissions associated with implementation of the project are discussed qualitatively by comparing the project to the 2005 Particulate Matter Attainment Plan and 2017 Clean Air Plan goals, policies, and control measures. In addition, comparing the rate of increase of plan VMT and population is recommended by BAAQMD for determining significance of criteria pollutants. If the project does not meet either criterion, then impacts would be potentially significant.

## **b. Project Impacts and Mitigation Measures**

<b>Threshold:</b>	Would the project conflict with or obstruct implementation of the applicable air quality plan?
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### **Impact AQ-1 THE PROJECT WOULD BE CONSISTENT WITH MCAQMD'S 2005 PARTICULATE MATTER ATTAINMENT PLAN AND BAAQMD'S 2017 CLEAN AIR PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

The 2005 Particulate Matter Attainment Plan contains several recommended control measures that would be implemented through MCAQMD regulations, to reduce emissions of particulate matter. The 2005 Particulate Matter Attainment Plan includes measures that would regulate the use of woodstoves, specifically that new development shall not include a woodstove as its sole source of heat. This measure would be implemented in accordance with the Uniform Building Code. Furthermore, in compliance with the California Green Building Standards Code (CalGreen) Section 4.503, installed woodstoves shall comply with USEPA's New Source Performance Standards emission limits. The 2005 Particulate Matter Attainment Plan includes construction and grading measures that call for increased enforcement of existing air quality regulations and development of a regulation that requires permits for projects that disturb over one acre. Development facilitated by the project would be required to comply with these air quality regulations. Considering that all the measures in the 2005 Particulate Matter Attainment Plan that are relevant to the project would be met during permitting and project design, the project would not conflict with or obstruct implementation of this plan.

While the 2017 Clean Air Plan was not adopted to include NCAB, MCAQMD defers to BAAQMD methodology. As such, project consistency with the 2017 Clean Air Plan is analyzed. The 2017 Clean Air Plan does not include control measures that apply directly to individual development projects. Instead, the control strategy includes stationary-source control measures to be implemented through BAAQMD regulations; mobile-source control measures to be implemented through incentive programs and other activities; and transportation control measures to be implemented through transportation programs in cooperation with the Metropolitan Transportation Commission, local governments, transit agencies, and others. Under BAAQMD's methodology, a determination of consistency with *CEQA Guidelines* thresholds should demonstrate that a project:

- Supports the primary goals of the 2017 Clean Air Plan;
- Includes applicable control measures from the 2017 Clean Air Plan; and
- Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures.

The 2017 Clean Air Plan contains 85 control strategies aimed at reducing air pollution and protecting the climate. For consistency with climate planning efforts at the State level, the control strategies in the 2017 Clean Air Plan are based on the same economic sector framework used by CARB, which encompass stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-greenhouse gas pollutants. Table 4.3-3 identifies applicable control measures and the project’s consistency with these measures.

**Table 4.3-3 Ukiah 2040 Consistency with 2017 Clean Air Plan Control Measures**

Control Measures	Consistency
<b>Transportation</b>	
<p><b>TR2: Trip Reduction Programs.</b> Implement the regional Commuter Benefits Program (Rule 14-1) that requires employers with 50 or more Bay Area employees to provide commuter benefits. Encourage trip reduction policies and programs in local plans, e.g., general and specific plans, while providing grants to support trip reduction efforts. Encourage local governments to require mitigation of vehicle travel as part of new development approval, to adopt transit benefits ordinances in order to reduce transit costs to employees, and to develop innovative ways to encourage rideshare, transit, cycling, and walking for work trips. Fund various employer-based trip reduction programs.</p>	<p><b>Consistent:</b> Buildout of the project would promote compatible land uses, resulting in City residents living and working in closer proximity to each other. By placing employment and commercial opportunities closer to residences, fewer vehicles trips would be encouraged since residents may walk or bike to jobs and services. Additionally, one of the guiding principles of Ukiah 2040 is to maintain and advance a well interconnected circulation network that accommodates and encourages alternative modes of transportation that reduce congestion and encourage walkable and bikeable neighborhoods. In addition, Ukiah 2040 proposed goals and policies would reduce vehicle trips in the City. Goals ENV-7 and related policies would reduce air quality impacts by creating transit-oriented development (Policy ENV-7.1) and encouraging active transportation use (Policy ENV-7.2). Goals MOB-1, MOB-2, and MOB-5, along with associated policies, aim to increase transit ridership and active transportation use, while reducing vehicle miles traveled.</p>
<p><b>TR3: Local and Regional Bus Service.</b> Fund local and regional bus projects, including operations and maintenance.</p> <p><b>TR4: Local and Regional Rail Service.</b> Fund local and regional rail service projects, including operations and maintenance.</p>	<p><b>Consistent.</b> Policy ENV-7.1 calls for transit-oriented development, which would include local and regional bus projects. Goal MOB-1 aims to provide a citywide network of complete streets that includes transit through Policies MOB-1.1, MOB-1.2, and MOB-1.8, which call for complete streets that serves transit users. Goal MOB-2 aims to reduce VMT through transportation demand management that services transit use (Policy MOB-2.2), convenient public transit facilities (Policy MOB-2.4), incentives to increase transit ridership (Policy MOB-2.5), and creation of a downtown transit center (Policy MOB-2.6).</p>
<p><b>TR9: Bicycle and Pedestrian Access and Facilities.</b> Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.</p>	<p><b>Consistent:</b> Policies in Ukiah 2040 support an efficient and safe bicycle and pedestrian system that would improve the connectivity and accessibility throughout the City. Policy ENV-7.2 prioritizes pedestrian and bicycle access, infrastructure, and education to increase active transportation use. Goal LU-2 encourages mixed-use development that creates walkable districts, through pedestrian orientation that creates a comfortable environment for walking (Policy LU-2.4). Policy LU-4.5 calls for pedestrian access to commercial uses from residential areas. Goals MOB-1, MOB-2, and MOB-5, along with associated policies, aim to create a more bikeable and walkable city. Namely, Policy MOB-1.2 strives for multi-modal access to new development projects; Policies MOB-1.9 and MOB-1.10 encourage a complete bikeway network with bicycle parking; Policy MOB-2.7 encourages public transportation to be bicycle accessible; and Policy MOB-5.1 calls for incentives for travel alternatives to single-occupant vehicles such as secure bicycle parking.</p>

Control Measures	Consistency
<b>Energy</b>	
<b>EN1: Decarbonize Electricity Production.</b> Engage with PG&E, municipal electric utilities and CCEs to maximize the amount of renewable energy contributing to the production of electricity within the Bay Area as well as electricity imported into the region. Work with local governments to implement local renewable energy programs. Engage with stakeholders including dairy farms, forest managers, water treatment facilities, food processors, public works agencies and waste management to increase use of biomass in electricity production.	<b>Consistent.</b> Goal ENV-8 aims to achieve carbon neutrality by 2045, which is supported by Policy ENV-8.3, which calls for adoption of an electrification plan to convert all municipal buildings to all electric using energy from carbon-free and renewable sources by 2035.
<b>EN2: Decrease Electricity Demand.</b> Work with local governments to adopt additional energy-efficiency policies and programs. Support local government energy efficiency program via best practices, model ordinances, and technical support. Work with partners to develop messaging to decrease electricity demand during peak times.	<b>Consistent:</b> Goal ENV-8 aims to achieve carbon neutrality by 2045, which is supported by Policy ENV-8.5, which promotes energy conservation by seeking opportunities to install energy efficient fixtures and appliances, solar panels, solar battery storage, and other retrofits to new and existing structures.
<b>Waste Management Control Measures</b>	
<b>WA4: Recycling and Waste Reduction.</b> Develop or identify and promote model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects	<b>Consistent.</b> Goal ENV-9 aims for a zero-waste community through adherence to Policy ENV-9.1, which promotes activities that reduce waste and increase waste diversion. Furthermore, Policy ENV-9.2 calls for a household waste program to facilitate the reuse and recycling of materials.
<b>Water Control Measures</b>	
<b>WR2: Support Water Conservation.</b> Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	<b>Consistent:</b> Policy ENV-4.5 supports efforts to increase recycled water use. Additionally, Policy ENV-4.7 encourages residential on-site water capturing systems for landscaping and household use.

Table 4.3-3 demonstrates that the project would not disrupt or hinder implementation of the 2017 Clean Air Plan control measures. Buildout of the project would not preclude planned transit or bike pathways and would not otherwise disrupt regional planning efforts to reduce VMT and meet federal and State air quality standards. Ukiah 2040 would be consistent with applicable 2017 Clean Air Plan control measures because the project would implement similar measures through proposed goals and policies that would reduce criteria pollutant emissions. Therefore, the project would be consistent with the applicable control measures in the 2017 Clean Air Plan and would not hinder implementation of any 2017 Clean Air Plan control measures.

## Mitigation Measures

No mitigation measures would be required.

## Significance After Mitigation

Impacts would be less than significant without mitigation.

<b>Threshold:</b>	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
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**Impact AQ-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN THE GENERATION OF AIR POLLUTANTS DURING CONSTRUCTION, WHICH COULD AFFECT LOCAL AIR QUALITY. DEVELOPMENT FACILITATED BY THE PROJECT WOULD ALSO RESULT IN A NET INCREASE OF CRITERIA POLLUTANTS DUE TO VMT. ALL FEASIBLE MITIGATION MEASURES TO REDUCE VMT ARE INCLUDED AS POLICIES IN UKIAH 2040. OVERALL OPERATIONAL IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.**

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## Construction

Construction activities associated with future development from Ukiah 2040 (including demolition, grading, construction worker travel, delivery and hauling of construction supplies and debris, and fuel combustion by on-site construction equipment) would generate pollutant emissions. These construction activities would create emissions of dust, fumes, equipment exhaust, and other air contaminants, particularly during site preparation and grading. The extent of daily emissions generated by construction equipment, particularly ROGs and NO<sub>x</sub> emissions, would depend on the quantity of equipment used and the hours of operation for each project. The extent of PM<sub>2.5</sub> and PM<sub>10</sub> emissions would depend upon the following factors:

- The amount of disturbed soils.
- The length of disturbance time.
- If existing structures are demolished.
- If excavation is involved.
- If transporting excavated materials offsite is necessary.

Dust emissions can lead to both nuisance and health impacts. According to the 2017 BAAQMD *CEQA Air Quality Guidelines*, PM<sub>2.5</sub> is the greatest pollutant of concern during construction.

BAAQMD (as well as MCAQMD) have identified feasible fugitive dust control measures for construction activities. These Basic Construction Mitigation measures are recommended for all projects. In addition, BAAQMD and CARB have regulations that address the handling of hazardous air pollutants such as lead and asbestos, which could be aurally disbursed during demolition activities. BAAQMD rules and regulations address both the handling and transport of these contaminants. Construction of future development would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution concentrations or air quality nuisances.

To promote clean air quality to protect public health and safety and to mitigate adverse air quality impacts, Ukiah 2040 includes the following proposed policies, which support implementation of feasible measures to reduce construction emissions associated with buildout of Ukiah 2040:

**Policy ENV-7.3:** Implement Clean Air Plan. The City shall cooperate with Mendocino County Air Quality Management District (MCAQMD) to implement the Clean Air Plan required by the Clean

Air Act, reduce non-attainment pollutants, including PM<sub>10</sub>, PM<sub>2.5</sub>, and ozone, and enforce air quality standards as required by State and Federal statutes.

**Policy ENV-7.5:** Construction and Operations. The City shall require that development projects incorporate feasible measures that reduce construction and operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).

**Policy ENV-8.4:** Municipal Preference of Emissions-Reduced Equipment. The City shall contract only with providers who use electric-powered equipment where available and feasible for City construction projects or contract services.

These proposed policies would reduce construction emissions generated by future projects facilitated by Ukiah 2040. Nonetheless, a potentially significant impact could still occur due to fugitive dust emissions. Implementation of the BAAQMD and MCAQMD Basic Construction Mitigation Measures would be required by Mitigation Measures AQ-1. Mitigation Measures AQ-1 would reduce fugitive dust emissions from future construction activities. Actions include watering onsite and reducing vehicle speed on unpaved roads to limit the amount of soil and dust disturbed.

### *Operations*

The greatest source of criteria pollutants in Ukiah is and would continue to be from transportation sources, specifically mobile emissions from roadway traffic. Ukiah 2040 emphasizes reducing VMT on area roadways through maintenance and advancement of a circulation network that encourages walkable and bikeable neighborhoods. The proposed policies in Ukiah 2040 that support VMT reduction or electric vehicle adoption, and thus a reduction in mobile criteria pollutants, are listed below:

**Goal ENV-7:** To improve air quality to the benefit of public health, welfare, and reduce air quality impacts with adverse effects on residents' health and wellbeing.

**Policy ENV-7.1:** Transit Oriented Development. The City shall concentrate new development near areas served by transit access and reduce single-occupancy vehicle dependency.

**Policy ENV-7.2:** Active Transportation. The City shall prioritize pedestrian and bicycle access, infrastructure, and education to encourage increased use of alternative modes of transportation as a means to reduce direct and indirect air contaminant emissions.

**Policy ENV-7.7:** City Vehicle and Equipment Fleet. The City shall continue to purchase low-emission vehicles and use clean alternative fuels as part of their fleet. When possible, the City will replace gas and hybrid vehicles with electric vehicles.

**Policy ENV-7.8:** Residential EV Charging Stations. The City shall encourage new development to install EV charging stations in homes to increase the potential for the public to use zero-emission vehicles, lessening the impacts to air quality through pollution.

**Policy ENV-7.9:** Public EV Charging Stations. The City shall install public charging stations in its commercial areas to provide additional charging options for city visitors.

**Goal LU-1:** To provide a variety of housing types that offer choices for Ukiah residents and create complete, livable neighborhoods.

**Policy LU-1.2:** Connectivity. The City shall encourage new residential development to incorporate design features that promote walking and connectivity between blocks.



**Policy LU-1.4:** High-Density Residential Uses. The City shall encourage new high-density residential development to locate in areas close to services and transit.

**Goal LU-2:** To encourage mixed-use development projects that create vibrant, walkable districts.

**Policy LU-2.1:** Downtown Mixed-Use. The City shall encourage mixed-use development to locate within the Downtown. Such developments include housing, retail commercial, offices, open space, and other compatible uses. This development pattern should create vibrant, walkable areas, in contrast to strip retail developments along corridors.

**Policy LU-2.3:** Mixed-Use Design. The City shall require new mixed-use development to limit the number of access driveways, minimize building setbacks, and provide public ground floor spaces adjacent to sidewalks.

**Policy LU-2.4:** Pedestrian Orientation. The City shall require new mixed-use and commercial developments with street or bike route frontage to include amenities that connect and create a comfortable environment for walking, sitting, and socializing.

**Policy LU-2.5:** Live/Work. The City shall encourage mixed-uses in appropriate non-residential or existing mixed-use areas, facilitate the adaptive reuse of otherwise obsolete structures, and promote the growth of the arts and small business ventures in the community by allowing combined workspace and living quarters in appropriate buildings in commercial or industrial zoning districts.

**Goal LU-4:** To encourage the growth and development of retail, office, service, and entertainment uses in Ukiah to provide jobs, support City services, and make Ukiah an attractive place to live.

**Policy LU-4.5:** Pedestrian Access to Commercial Uses. The City shall support convenient and direct pedestrian access to commercial uses that are located adjacent to residential areas.

**Goal MOB-1:** To provide a citywide network of complete streets that meet the needs of all users, including pedestrians, bicyclists, motorists, transit, movers of commercial goods, children, seniors, and persons with disabilities.

**Policy MOB-1.1:** Complete Streets. The City shall design streets holistically, using a complete streets approach, which considers pedestrians, bicyclists, motorists, transit users, and other modes together to adequately serve future land uses.

**Policy MOB-1.2:** Multi-modal Access. The City shall require that all new development and redevelopment projects include provisions for multi-modal access provisions such as pedestrian and bicycle facilities, and vehicle and transit where relevant.

**Policy MOB-1.3:** Reallocate Space for Complete Streets. The City shall reallocate roadway space to allow complete streets improvements on streets with excess traffic capacity.

**Policy MOB-1.4:** Block Length. The City shall limit block lengths to 600 feet wherever feasible to enhance multi-modal circulation and connectivity.

**Policy MOB-1.8:** New Development and Complete Streets. The City shall require all new development to provide adequate access for pedestrians, bicyclists, motorists, transit users, and persons with disabilities, as well as facilities necessary to support the City's goal of maintaining a complete street network.

**Policy MOB-1.9: Bikeway Network.** The City shall strive to complete the citywide bicycle network to create a full network of bicycle facilities throughout Ukiah, including bicycle lanes on all arterial and collector street segments where feasible.

**Policy MOB-1.10: Bicycle Parking Standards.** The City shall maintain efficient and updated parking standards for bicycle parking to ensure development provides adequate bicycle parking, while reducing reliance on automobiles.

**Policy MOB-1.11: Pedestrian Barriers & Utility Relocation.** The City shall support elimination of barriers to pedestrian travel on sidewalks and walking paths including requiring the relocation or undergrounding of utilities where appropriate.

**Goal MOB-2:** To reduce vehicle miles traveled (VMT) to and from residences, jobs and commercial uses in Ukiah.

**Policy MOB-2.1: Vehicle Miles Traveled (VMT) Reduction.** The City shall support development and transportation improvements that help reduce VMT below regional averages on a “residential per capita” and “per employee” basis.

**Policy MOB-2.2: Transportation Demand Management.** The City shall support programs to reduce vehicle trips, including measures such as reduced parking requirements that aim to increase transit use, car-pooling, bicycling and walking.

**Policy MOB-2.3: Pedestrian Facilities.** The City shall encourage new development and redevelopment that increases connectivity through direct and safe pedestrian connections to public amenities, neighborhoods, shopping and employment destinations throughout the City.

**Policy MOB-2.4: Transit Facility Design.** The City shall require new development to include facilities designed to make public transportation convenient.

**Policy MOB-2.5: Transit Ridership.** The City shall support funding and incentives to increase transit ridership opportunities.

**Policy MOB-2.6: Downtown Transit Center.** The City shall support creation of a Transit Center.

**Policy MOB-2.7: Bicycle Accessible Transit.** The City shall encourage the MTA and other public transportation providers to make bus routes connecting Ukiah with other areas bicycle accessible.

**Goal MOB-5:** To promote a balance of multi-modal options, to be reflected in flexible parking regulations.

**Policy MOB-5.1: Incentives for Travel Alternatives.** The City shall work with downtown businesses and employers reduce the need for and expenses of off-street parking by supporting and encouraging alternatives to single-occupant vehicles such as incentives and priority parking for carpools and vanpools, secure bicycle parking, and free bus passes.

**Policy MOB-5.2: Support for Charging Stations.** The City shall support the provision of charging stations for electric vehicles, as well as other types of vehicles, as new technologies emerge.

According to the BAAQMD 2017 *CEQA Air Quality Guidelines*, the threshold for criteria air pollutants and precursors requires comparison of the rate of increase of plan VMT and plan area population. As discussed in Section 4.11, *Transportation*, Ukiah 2040 is expected to have less land use diversity than existing conditions, due to the amount of non-residential development that could occur in the

maximum buildout scenario. Given the total size of non-residential development relative to residential growth in the maximum buildout scenario, there could be a net increase in the number of non-resident workers commuting to jobs in Ukiah. Nonetheless, the diversity score for Ukiah 2040 would remain below the existing countywide average and impacts from VMT per capita were found to be less than significant for the project.

Nonetheless, even though the VMT impact would be less than significant, overall VMT would increase due to the project. Therefore, while the Ukiah 2040 proposed policies listed above would have the effect of reducing mobile VMT per capita, and in turn operational criteria pollutants, overall VMT would increase compared with existing conditions. Mitigation Measures AQ-2 would be applied to future development project and would require implementation of measures to reduce air quality emissions during the operation phase of future projects. Nonetheless, ultimately vehicle emissions depend somewhat on individual transportation choices that the City would not have full control over. Therefore, Ukiah 2040 impacts from operational criteria pollutant emissions would be significant and unavoidable.

## **Mitigation Measure**

### *AQ-1 Implement BAAQMD and MCAQMD Basic Construction Mitigation Measures*

To reduce fugitive dust emissions from the construction of individual projects, the City shall require that future projects implement the BAAQMD and MCAQMD Basic Construction Mitigation Measures. These include, but are not limited to, the following: =

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times a day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacture's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper conditions prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's number shall also be visible to ensure compliance with applicable regulations.

### *AQ-2 Implement Measures to Reduce Operational Emissions*

Prior to discretionary approval by the City of Ukiah for development projects subject to CEQA review (i.e., non-exempt projects), a screening assessment shall be performed by the City using the screening criteria from the 2017 BAAQMD CEQA Air Quality Guidelines. If the project exceeds the

screening size by land use type, the project applicant shall prepare and submit a technical assessment to the City for review and approval, which evaluates potential project-related operational air quality impacts. The evaluation shall be prepared in conformance with BAAQMD methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the BAAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:

- For site-specific development that requires refrigerated vehicles, the planning documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers, to reduce idling time and emissions.
- Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.
- Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 California Code of Regulations Chapter 10 Section 2485).
- Provide changing/shower facilities as specified in Section A5.106.4.3 of the CalGreen Code (Nonresidential Voluntary Measures).
- Provide bicycle parking facilities pursuant to Section A4.106.9 (Residential Voluntary Measures) of the CalGreen Code.
- Provide preferential parking spaces for low-emitting, fuel-efficient, and carpool/van vehicles per Section A5.106.5.1 of the CalGreen Code (Nonresidential Voluntary Measures).
- Provide facilities to support electric charging stations pursuant to Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of the CalGreen Code.
- Applicant-provided appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers) shall be Energy Star–certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star–certified or equivalent appliances shall be verified by Building & Safety during plan check.
- Applicants for future development projects along existing and planned transit routes shall coordinate with the City and County to ensure that bus pad and shelter improvements are incorporated, as appropriate.

## **Significance After Mitigation**

With adherence to proposed Ukiah 2040 policies and Mitigation Measure AQ-1, cumulative construction impacts associated with violating an air quality standard or contributing substantially to an existing or projected air quality violation in terms of criteria air pollutant emissions would be less than significant with mitigation. Implementation of Ukiah 2040 would result in an increase in development intensity and would result in an overall increase in VMT. Mitigation Measure AQ-2 would be applied to reduce air quality emissions during operation of future projects. Though the diversity score for Ukiah 2040 would remain below the existing countywide average and impacts from VMT per capita were found to be less than significant, implementation of the project could

result in a cumulatively considerable net increase of particulate matter for which the region is nonattainment, and operational impacts would be considered significant and unavoidable.

<b>Threshold:</b>	Would the project expose sensitive receptors to substantial pollutant concentrations?
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**Impact AQ-3 CONSTRUCTION ACTIVITIES FOR INDIVIDUAL PROJECTS FACILITATED BY UKIAH 2040 COULD EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS; HOWEVER, IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

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## Construction

Although it is anticipated that most development would occur within infill areas, development facilitated by Ukiah 2040 could result in DPM exhaust emissions from off-road, heavy-duty diesel equipment associated with site preparation (e.g., excavation, grading, clearing), building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM (as discussed below) outweighs the potential non-cancer<sup>2</sup> health impacts (CARB 2021).

Generation of DPM from construction typically occurs in a single area for a short period. Under the maximum build-out scenario, construction of development facilitated by the project could occur over approximately two decades, but use of diesel-powered construction equipment in any one area would likely occur for no more than a couple of years for an individual project and would cease when construction is completed. It is not possible to quantify risk without specific project details and locations, as impacts would vary based on location, intensity, construction methods, etc. For example, a project proposing construction of a small-scale commercial building on an infill site over a six-month construction period would generally have less impacts than a large-scale commercial development on an undeveloped site with a two-year construction period.

The primary factor used to determine health risk is the dose to which the receptors are exposed. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the development (OEHHA 2015). BAAQMD uses an exposure period of 30 years (BAAQMD 2016).

The maximum PM<sub>10</sub> and PM<sub>2.5</sub> emissions would occur during demolition, site preparation, and grading activities, which would only occur for a portion of the overall estimated timeframe of approximately one to eight years for individual project construction. These activities would typically last for approximately two weeks to two years, depending on the extent of grading and excavation required (e.g., projects with subterranean parking structures or geological constraints require additional grading as compared to those without). PM<sub>10</sub> and PM<sub>2.5</sub> emissions would decrease for the remaining construction period because construction activities such as building construction and architectural coating would require less intensive construction equipment. While the maximum

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<sup>2</sup> Non-cancer risks include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function.

DPM emissions associated with demolition, site preparation, and grading activities would only occur for a portion of the overall construction period, these activities represent the worst-case condition for the total construction period. This would represent between 0.1 to 7 percent of the total 30-year exposure period for health risk calculation.

Ukiah 2040 contains proposed Policy ENV-7.5 (described in Impact AQ-2), which would have the effect of minimizing construction TACs from future projects facilitated by Ukiah 2040. Future projects facilitated by Ukiah 2040 would also be required to be consistent with the 2017 Clean Air Plan, 2005 Particulate Matter Attainment Plan, BAAQMD and MCAQMD regulatory requirements and control strategies, and the CARB In-Use Off-Road Diesel Vehicle Regulation, which are intended to reduce emissions from construction equipment and activities. Additionally, future development facilitated by Ukiah 2040 would be required to comply with Mitigation Measure AQ-1 requiring implementation of construction emission measures which would reduce construction-related TACs.

According to the OEHHA, construction of individual projects lasting longer than two months or placed within 1,000 feet of sensitive receptors could potentially expose nearby sensitive receptors to substantial pollutant concentrations, and therefore could result in potentially significant risk impacts. These future projects could exceed BAAQMD's thresholds of an increased cancer risk of greater than 10.0 in a million and an increased non-cancer risk of greater than 1.0 Hazard Index (Chronic or Acute). Therefore, construction impacts from TAC emissions would be potentially significant. Implementation of Mitigation Measure AQ-3 would require coordination with the City to determine if a construction Health Risk Assessment (HRA) would be needed for future projects with construction timelines greater than two months and within 1,000 feet of sensitive receptors, to reduce potential risk exposure to nearby sensitive receptors.

## **Operations**

The BAAQMD *CEQA Guidelines* include a methodology for jurisdictions wanting to evaluate the potential impacts from placing sensitive receptors proximate to major air pollutant sources. For assessing community risk and hazards for siting a new receptor, sources within a 1,000-foot radius of a project site are typically considered. Sources are defined as freeways or high-volume roadways with 10,000 vehicles or more per day and permitted sources (BAAQMD 2017).

Development facilitated by Ukiah 2040 could accommodate a net increase of approximately 2,350 residential units and 4,514,820 non-residential square footage. However, potential buildout of Ukiah 2040 in accordance with land use and zoning regulations would not site land uses that typically generate TAC, such as industrial land uses, in close proximity to residential land uses. Additionally, if commercial and retail uses site a new stationary TAC source, like an emergency generator, then that stationary source would be required to receive a permit from MCAQMD and the City's Building Division. The permitting process would ensure that the stationary source does not present a health risk to existing nearby sensitive receptors.

To minimize health risks to sensitive receptors near stationary sources and/or freeways and high-volume roadways, Ukiah 2040 contains proposed Policy ENV-7.5 (described in Impact AQ-2), which support implementation of feasible policies to reduce TAC emissions associated with buildout of Ukiah 2040.

In addition, the following environmental justice policies in Ukiah 2040, reinforce the need for compatible land uses to reduce exposure to environmental hazards.

**Policy LU-12.2:** Disproportionate Land Use Impacts. The City shall evaluate and avoid, reduce, or mitigate disproportionate adverse health and safety impacts of land use decisions on identified disadvantaged communities.

**Policy LU-12.3:** Coordination of Siting of Utilities. The City shall coordinate with utility providers in the siting, site layout, and design of gas and electric facilities, including changes to existing facilities, to minimize environmental, and safety impacts on disadvantaged communities.

As individual developments facilitated by Ukiah 2040 are evaluated on a future project-by-project basis, the proposed policies mentioned above would be implemented to reduce impacts and ensure that sensitive receptors would not be exposed to substantial pollutant concentrations due to location or design. Therefore, with adherence to these Ukiah 2040 policies, operational impacts related to TAC emissions would be less than significant.

## Mitigation Measure

### AQ-3 Conduct Construction Health Risk Assessment

For individual projects (excluding accessory dwelling units, single-family residences, and duplexes) where construction activities would occur within 1,000 feet of sensitive receptors, would last longer than two months, and would not utilize Tier 4 and/or alternative fuel construction equipment, the project applicant shall prepare a construction health risk assessment (HRA) prior to project approval. The HRA shall determine potential risk and compare the risk to the following BAAQMD thresholds:

- Non-compliance with Qualified Community Risk Reduction Plan;
- Increased cancer risk of > 10.0 in a million;
- Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or
- Ambient PM<sub>2.5</sub> increase of > 0.3 µg/m<sup>3</sup> annual average

If risk exceeds the thresholds, measures such as requiring the use of Tier 4 and/or alternative fuel construction equipment shall be incorporated to reduce the risk to appropriate levels.

## Significance After Mitigation

Construction related TACs exposure impacts would be less than significant with implementation of Mitigation Measure AQ-3.

<b>Threshold:</b>	Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?
-------------------	--

**Impact AQ-4 DEVELOPMENT FACILITATED BY UKIAH 2040 WOULD NOT CREATE OBJECTIONABLE ODORS THAT COULD ADVERSELY AFFECT A SUBSTANTIAL NUMBER OF PEOPLE AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

Implementation of Ukiah 2040 would generate oil and diesel fuel odors during construction from equipment use as well as odors related to asphalt paving. The odors would be limited to the construction period and would be temporary. Therefore, odors emitted from the construction of individual future projects under Ukiah 2040 would be less than significant.

As stated in the BAAQMD *CEQA Guidelines*, land uses typically producing objectionable odors include agricultural uses, wastewater treatment plants, food manufacturing plants, chemical plants, composting, refineries, landfills, and confined animal facilities. Development facilitated by Ukiah 2040 would include residential, office, and retail development within current City limits. These land uses typically do not produce objectionable odors. In addition, Ukiah 2040 would not add additional light industrial/office land uses that would have the potential to expose sensitive receptors, such as residences, to odors. Annexation Areas A and B would include agricultural uses; however, no additional land would be designated for agricultural use under Ukiah 2040; thus, no changes from existing conditions regarding odors would occur. Other odors from buildout of Ukiah 2040 include odor emissions that would be limited to odors associated with vehicle and engine exhaust and idling; however, odors from vehicles are not stationary and are dispersed throughout the roadway network. Therefore, operational odor impacts would be less than significant.

### **Mitigation Measures**

No mitigation measures would be required.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation.



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## 4.4 Biological Resources

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This section summarizes the biological resources in and near the Planning Area and analyzes the impacts, included direct and indirect impacts, related to biological resources due to the project.

### 4.4.1 Setting

The City of Ukiah is located along the Russian River, within the Ukiah Valley, between the Mendocino and Mayacamas mountain ranges. The Mayacamas and Mendocino mountain ranges habitat types and vegetation communities are shown in Figure 4.4-1. The City of Ukiah is largely developed with urban and suburban uses. The proposed sphere of influence (SOI) predominantly includes undeveloped and agricultural areas. The U.S. Highway 101 corridor runs north and south within the east side of Ukiah and several creeks run through the City. The aquatic resources and the undeveloped areas provide habitat for wildlife, including special status plant and animal species.

#### **a. Natural Communities/Landcover**

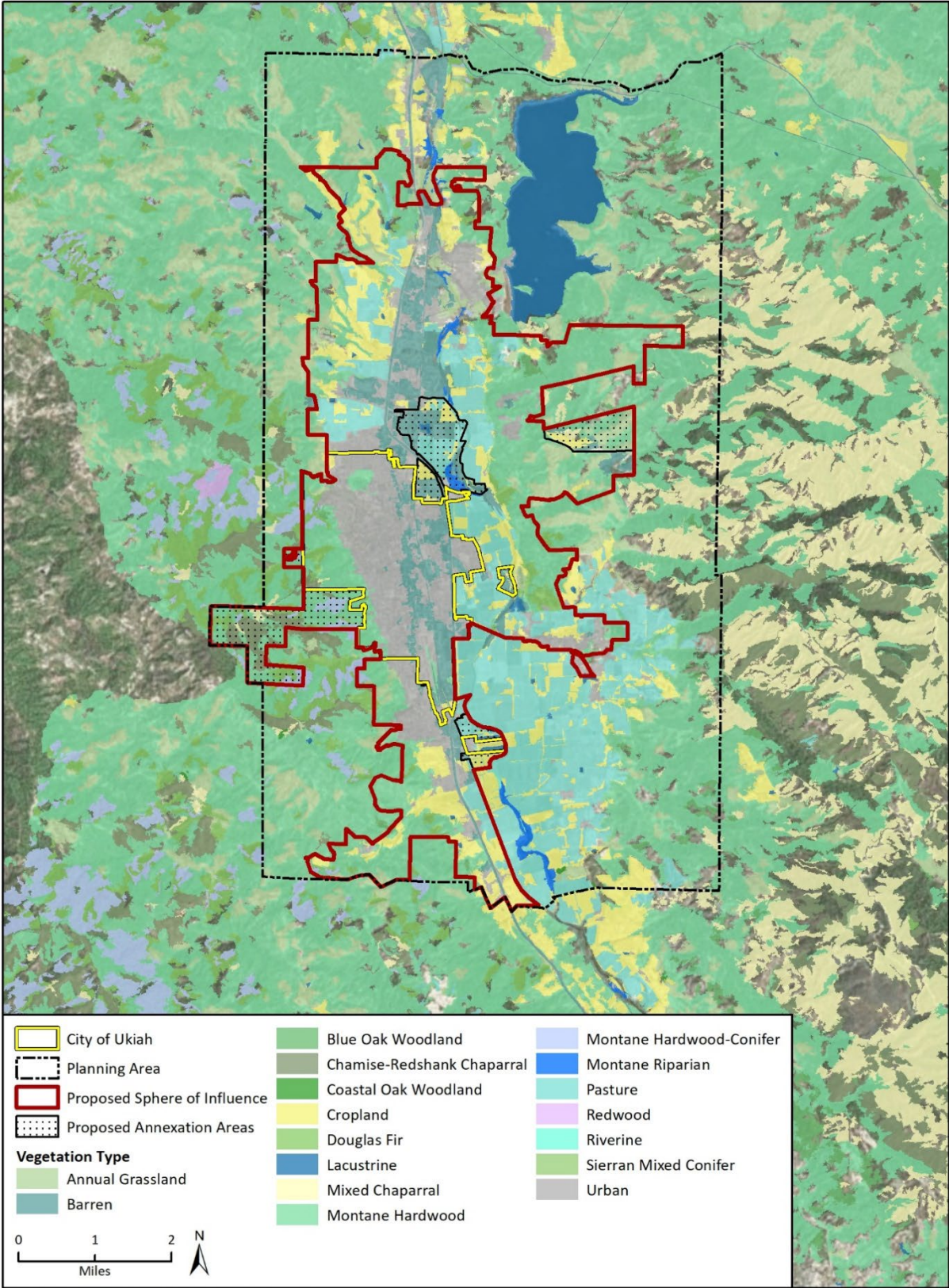
The natural community/ landcover descriptions listed below are based on the California Department of Fish and Wildlife (CDFW) California Wildlife Habitat Relationships classification scheme (CWHR) (Mayer and Laudenslayer 1988). Figure 4.4-1 shows the habitat types/natural communities in the Planning Area. This information is based on data from the United States Department of Agriculture (USDA) Forest Service Calveg (USDA 2004). Vegetation alliances, characterizing vegetation commonly found together, used in the Ukiah vegetation map, in compliance with the United States (U.S.) National Vegetation Classification System were grouped in accordance with the CWHR classification scheme. The list below includes a discussion of natural communities/ landscapes in and adjacent to the Planning Area.

#### **Annual Grassland**

Annual grassland habitats are herbaceous communities composed primarily of annual grass and forb species. These vegetation communities exist throughout the Planning Area, where introduced annual grasses are the dominant plant species. These species include wild oats (*Avena* sp.), soft chess brome (*Bromus hordeaceus*), ripgut brome (*B. diandrus*), red brome (*B. madritensis*), wild barley (*Hordeum murinum*), and foxtail fescue (*Festuca myuros*). Common forbs include broadleaf filaree (*Erodium botrys*), redstem filaree (*E. cicutarium*), turkey mullein (*Croton setiger*), true clovers (*Trifolium* spp.), bur clover (*Medicago polymorpha*), popcorn flowers (*Plagiobothrys* spp.), California poppy (*Eschscholzia californica*), and many others. Native perennial grasses, found in moist, lightly grazed, or relic prairie areas, are dominated by California oatgrass (*Danthonia californica*), Pacific hairgrass (*Deschampsia cespitosa holciformis*), and sweet vernal grass (*Anthoxanthum odoratum*).

Annual grassland communities and relic perennial grasslands within them occur in patches of various sizes throughout the State. Annual grassland habitat occurs mostly on flat plains to gently rolling foothills. Annual grasslands provide habitat for many wildlife species, including western fence lizard (*Sceloporus occidentalis*), common garter snake (*Thamnophis sirtalis*), western rattlesnake (*Crotalus oreganus oreganus*), black-tailed jackrabbit (*Lepus californicus*), California ground squirrel (*Otospermophilus beecheyi*), and Botta's pocket gopher (*Thomomys bottae*).

Figure 4.4-1 Habitat Types and Vegetation Communities in the Planning Area



Imagery provided by Microsoft Bing and its licensors © 2022.  
CalVeg Classification Layer provided by USDA Forest Service Region 5. Source Imagery for this classification ranges from 2008 - 2015.

Fig. 4.4-1. Vegetation and Land Cover

## Barren

Barren habitat is defined by the absence of vegetation. Any habitat with less than 2 percent total vegetation cover by herbaceous, desert, or non-wildland species and less than 10 percent cover by tree or shrub species is defined as barren. Structure and composition of the substrate is largely determined by the region of the state and surrounding environment. Along rivers, it includes vertical riverbanks and canyon walls. Desert habitats may be defined as barren when vegetation is widely spaced. Alpine barren habitat includes exposed parent rock, glacial moraines, talus slopes and any surface permanently covered with snow or ice. Urban settings covered in pavement and buildings may be classified as barren as long as vegetation, including non-native landscaping, does not reach the percentage cover thresholds for vegetated habitats (Mayer and Laudenslayer 1988). Barren habitat occurs throughout the Planning Area, including within the City limits.

## Blue Oak Woodland

Blue oak (*Quercus douglasii*) woodlands occur in the Planning Area and vary in species composition. They have an overstory of scattered trees, although the canopy can be nearly closed. The canopy is dominated by broad-leaved trees 5 to 15 meters (16 to 50 feet) tall, commonly forming open savanna-like stands on dry ridges and gentle slopes. Blue oaks may reach 25 meters (82 feet) in height. Shrubs are often present but rarely extensive, often occurring on rock outcrops. A typical understory is composed of an extension of annual grassland vegetation. Blue oak woodlands provide habitat for a variety of wildlife species, including western gray squirrel (*Sciurus griseus*), eastern gray squirrel (*Sciurus carolinensis*), California scrub jays (*Aphelocoma californica*). Blue oak woodland occurs throughout the Planning Area, including within the City limits.

## Coastal Oak Woodland

Coastal oak woodlands occur in the Planning Area and vary in species composition. The overstory consists of deciduous and evergreen hardwoods, mostly oaks (*Quercus* spp.) (15 to 70 feet tall) sometimes mixed with scattered conifers. In mesic sites, the trees are dense and form a closed canopy. In drier sites, the trees are widely spaced, forming an open woodland or savannah. The understory is equally variable. In some instances, it is composed of shrubs from adjacent chaparral or coastal scrub which forms a dense, almost impenetrable understory. More commonly, shrubs are scattered under and between trees. The soils and parent material on which coastal oak woodlands occur are extremely variable (CDFW 2014). Coastal oak woodlands provide habitat for a variety of wildlife species, including California quail (*Callipepla californica*), turkey (*Meleagris gallopavo*), western gray squirrel, eastern gray squirrel, and Columbian black-tailed deer (*Odocoileus hemionus columbianus*). Coastal oak woodlands is mapped in several locations within the Planning Area. No coastal oak woodland is mapped within the City limits.

## Cropland

Vegetation in this habitat includes a variety of sizes, shapes, and growing patterns. Field corn can reach ten feet while strawberries are only a few inches high. Although most crops are planted in rows, alfalfa hay and small grains (rice, barley, and wheat) form dense stands with up to 100 percent canopy closure. Most croplands support annuals, planted in spring and harvested during summer or fall. In many areas, second crops are commonly planted after harvesting the first. Wheat is planted in fall and harvested in late spring or early summer. Cropland habitat is generally concentrated in the south, north and east of the Planning Area and proposed SOI, outside of the City limits.

## Douglas Fir

Douglas fir (*Pseudotsuga menziesii*) habitat forms a complex mosaic of forest expression due to the geologic, topographic, and successional variation typical within its range. Typical aggregations include a lower overstory of dense, sclerophyllous, broad-leaved evergreen trees (tanoak, Pacific madrone) up to 35 meters (114 feet) tall, with an irregular, often open, higher overstory of tall needle-leaved evergreen trees (Douglas-fir) up to 90 meters (295 feet). On wet sites, shrub layers are well developed, often with 100 percent cover. Cover of the herbaceous layer under the shrubs can be up to 10 percent. At higher elevations, the shrubs disappear and the herb layer is often 100 percent. Typical mesic habitats have a poorly developed or non-existent shrub and herb layer. Dry habitats have greater cover of shrubs and especially grasses (Mayer and Laudenslayer 1988). Douglas fir habitat is generally concentrated in the western side of the Planning Area and proposed SOI, outside of City limits.

This habitat type supports high wildlife species abundance, particularly of bird species including the Northern spotted owl (*Strix occidentalis caurina*) and Hutton's vireo (*Vireo huttoni*), but also an abundance of salamander and reptile species whose distributions are generally coincident to that of the Douglas fir habitat. Typical mammals found in this habitat include Pacific fisher (*Pekania pennanti*), dusky-footed woodrat (*Neotoma fuscipes*), and deer mouse (*Peromyscus maniculatus*).

## Mixed Chaparral

Mixed Chaparral is a structurally homogeneous brushland type dominated by shrubs with thick, stiff, heavily cutinized evergreen leaves. Shrub height and crown cover vary considerably with age since last burn, precipitation regime (cismontane vs. transmontane), aspect, and soil type. At maturity, cismontane Mixed Chaparral typically is a dense, nearly impenetrable thicket with greater than 80 percent absolute shrub cover. Canopy height ranges from 1 to 4 meters (3.3 to 13.1 feet), occasionally to 6 meters (19.6 feet). On poor sites, serpentine soils or transmontane slopes, shrub cover may be only 30 to 60 percent and shrubs may be shorter, 0.5 to 3 meters (1.6 to 9.8 feet). Considerable leaf litter and standing dead material may accumulate in stands that have not burned for several decades (Mayer and Laudenslayer 1988). Mixed chaparral habitat is generally found in the foothills surrounding and within the eastern portion of the Planning Area (outside of City limits and outside most of the proposed SOI).

## Montane Hardwood

Montane hardwood habitat is typically composed of a pronounced hardwood tree layer, with an infrequent and poorly developed shrub stratum, and a sparse herbaceous layer. The montane hardwood habitat ranges throughout California mostly west of the Cascade-Sierra Nevada crest. East of the crest, it is found in localized areas of Placer, El Dorado, Alpine and San Bernardino Counties. Elevations range from 300 feet near the Pacific Ocean to 9000 feet in southern California.

Bird and animal species characteristic of the montane hardwood habitat include disseminators of acorns such as California scrub jay and Steller's jay (*Cyanocitta stelleri*), acorn woodpecker (*Melanerpes formicivorus*), and western gray squirrel, plus those that utilize acorns as a major food source including wild turkey, band-tailed pigeon (*Patagioenas fasciata*), California ground squirrel, dusky-footed woodrat, and mule deer. Deer also use the foliage of hardwoods to a moderate extent. Many amphibians and reptiles are found on the forest floor in the Montane Hardwood habitat (Mayer and Laudenslayer 1988). Montane hardwood habitat is generally concentrated in the



mountains in the east and west of the Planning Area, including within the City limits and proposed SOI.

### **Montane Hardwood-Conifer**

Montane Hardwood-Conifer habitat includes both conifers and hardwoods. The habitat often occurs in a mosaic-like pattern with small pure stands of conifers interspersed with small stands of broad-leaved trees. This landcover consists of a broad spectrum of mixed conifer and hardwood species. Typically, conifers up to 200 feet in height form the upper canopy and broad-leaved trees 30 to 100 feet in height comprise the lower canopy. Relatively little understory occurs under the dense, canopy. However, considerable ground and shrub cover can occur in ecotones or following disturbance such as fire or logging. Like Montane Hardwood, this community provides habitat and food sources for a variety of wildlife species, and mature forests are particularly valuable for cavity nesting birds (Mayer and Laudenslayer 1988). Montane Hardwood-Conifer habitat is scattered in the mountains to the west of the Planning Area, generally outside of City limits.

### **Montane Riparian**

The vegetation of montane riparian zones is quite variable and often structurally diverse. Usually, the montane riparian zone occurs as a narrow, often dense grove of broad-leaved, winter deciduous trees up to 30 meters (98 feet) tall with a sparse understory. At high mountain elevations, the montane riparian habitat is usually less than 15 meters (49 feet) high with more shrubs in the understory. At high elevations, the montane riparian habitat may not be well developed or may occur in the shrub stage only. All riparian habitats have exceptionally high value for a wide variety of wildlife species (Mayer and Laudenslayer 1988). Montane riparian habitat is found throughout the mountains surrounding the Planning Area, outside of City limits.

### **Pasture**

Pasture vegetation is a mix of perennial grasses and legumes that normally provide 100 percent canopy closure. Height of vegetation varies, according to season and livestock stocking levels, from a few inches to two or more feet on fertile soils before grazing. Old or poorly drained pastures may have patches of weeds more than two feet in height. Pastures may be used by a variety of wildlife depending on the geographic area and types of adjacent habitats. These include ground-nesting birds as well as large mammals such as deer and elk, and wetland associated birds where flood irrigation is used or pastures are specifically flooded in fall and winter for waterfowl management (Mayer and Laudenslayer 1988). Pasture habitat is generally located in the eastern and northern side of the Planning Area and proposed SOI, outside of City limits.

### **Redwood**

Second growth redwood habitats are characterized by even-aged structure with an open parklike appearance. Typically, on disturbed sites the vegetation establishes very quickly (within one year). In time, the habitat is composed of dense, shrubby vegetation with overlapping canopies. Over time, trees become uniform in size and height, suppressing understory vegetation. In old-growth redwood forests, understory vegetation is usually very dense and composed of 3 to 4 meters (10 to 13 feet) tall shrubs. Open parklike old-growth stands seldom occur. Redwoods are vigorous sprouters, with sprouts eventually forming the dominant canopy. Redwood and associated conifers also reproduce well by seed. When suppressed by the dominant canopy, seedling heights are usually less than 10 meters (33 feet). Redwood forests provide food, cover, or special habitat elements for a wide

variety of species, most notably a variety of sensitive species including California red-legged frog (*Rana draytonii*), fisher, and ringtail (*Bassariscus astutus*) (Mayer and Laudenslayer 1988). Redwood habitat is generally located on the western side of the Planning Area, outside of City limits.

### **Sierran Mixed Conifer**

The Sierran mixed conifer habitat is an assemblage of conifer and hardwood species that forms a multilayered forest. Historically, burning and logging have caused wide variability in stand structure, resulting in both even-aged and uneven-aged stands. Virgin old-growth stands where fire has been excluded are often two-storied, with the overstory comprised of mixed conifer and the understory white fir and incense-cedar. These multilayered canopies generally form with nearly 100 percent overlapping cover. When openings occur, a variety of shrubs are common. Closed canopy stand distribution can be both extensive and patchy, depending on scale, site, slope, soils, microclimate, and history. In the California Coast Ranges, populations of mixed conifer are typically disjunct (Mayer and Laudenslayer 1988). The variety in plant species composition in this habitat provides diversity in food and cover, supporting a wide variety of wildlife species including some sensitive species such as northern spotted owl, fisher, and peregrine falcon (*Falco peregrinus*). Sierran mixed conifer habitat is predominantly located in the western portion of the Planning Area, outside of City limits.

### **Urban**

This land cover type is completely anthropogenic and is composed of residential, commercial, and industrial developed areas. Plant species within urban areas are typically comprised of ornamental plants and non-native invasive plant species, with large, developed areas lacking vegetation. The urban landcover is predominantly located within the City; however, there are urban areas also within the proposed SOI and Planning Area, near U.S. Highway 101.

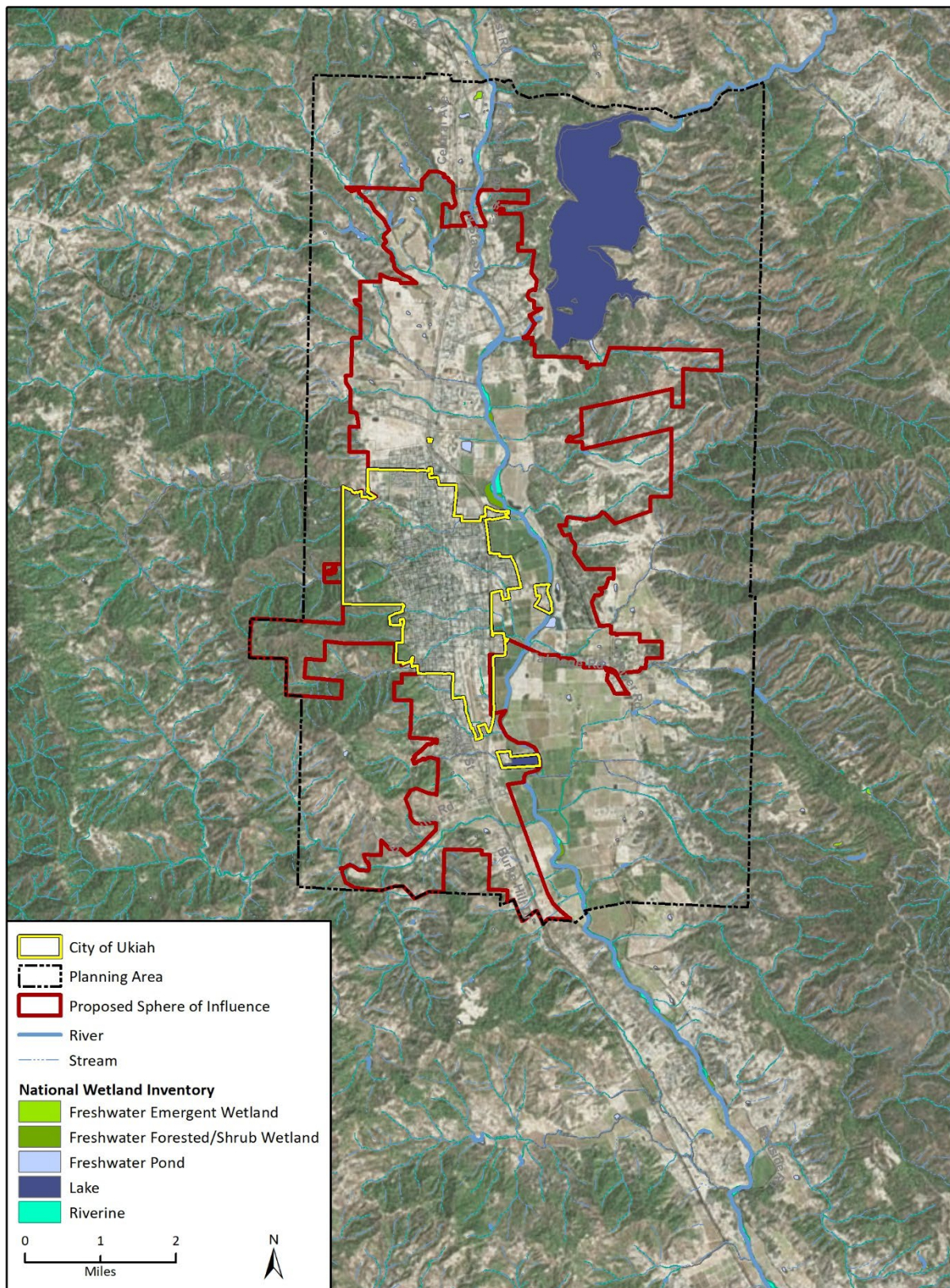
### **b. Wetlands and Water Features**

Wetlands and water features include freshwater sloughs, marshes, vernal pools, wet meadows, springs and seeps, portions of lakes, ponds, rivers and streams, and all other areas that are periodically or permanently covered by shallow water, are dominated by hydrophytic vegetation, or have soils that are predominantly hydric in nature. The area within the City and the SOI contains wetlands and waters mapped by the U.S. Fish and Wildlife's (USFWS) National Wetland Inventory (NWI) (2022). These include lacustrine and riverine features. Wetland and water features located in the Planning Area and surrounding area are shown in Figure 4.4-2.

### **Lacustrine**

Lacustrine habitats are inland depressions or dammed riverine channels containing standing water. They may vary from small ponds less than one hectare to large areas covering several square kilometers. Depth can vary from a few centimeters to hundreds of meters. Typical lacustrine habitats include permanently flooded lakes and reservoirs (e.g., Lake Tahoe and Shasta Lake), intermittent lakes (e.g., playa lakes) and freshwater ponds (including vernal pools) so shallow that rooted plants can grow over the bottom. Most permanent lacustrine systems support fish life; intermittent types usually do not. Lacustrine features found within the Planning Area include lakes and ponds.

Figure 4.4-2 Wetlands and Waters



Imagery and basemap data provided by Esri and its licensors © 2022.  
Additional data provided by Mendocino County; FEMA 2021.

Fig 4.3-2 Wetlands and Waters



## Riverine

Riverine habitat occurs within the Planning Area and features include intermittent or continually running water such as rivers and streams. A stream originates at an elevated source, such as a spring or lake, and flows downward at a rate relative to slope or gradient and the volume of surface runoff or discharge. Rivers and streams occur statewide, mostly between sea level and 8,000 feet. Riverine habitats can occur in association with many terrestrial habitats. Riparian habitats are found adjacent to many rivers and streams. Riverine habitats are also found contiguous to lacustrine and fresh emergent wetland habitats.

The open water zones of large rivers provide resting and escape cover for many species of waterfowl. Gulls (*Larus* spp.), terns (*Sterna* spp.), and osprey hunt in open water. Near-shore waters provide food for waterfowl, herons, shorebirds, belted-kingfisher (*Megaceryle alcyon*) and American dipper (*Cinclus mexicanus*). Many species of insectivorous birds (swallows, swifts, flycatchers) hawk their prey over water. Some of the more common mammals found in riverine habitats include river otter (*Lontra canadensis*), mink (*Neovison vison*), and muskrat (*Ondatra zibethicus*).

### c. Special-Status Species

Special-status species include those listed as rare, threatened, or endangered by CDFW or the USFWS; are candidates for either state or federal listing; have been designated as "fully protected" or "species of special concern" by USFWS and CDFW; or are other species that are tracked by the California Natural Diversity Database (CNDDDB) or California Native Plant Society (CNPS), but do not fall into any of the categories cited above. Information regarding the occurrences of special-status species in the vicinity of the Planning Area was obtained from searching the CDFW CNDDDB (CDFW 2022), USFWS Information for Planning and Conservation (IPaC) (February 2022), and CNPS's Electronic Inventory (CNPS 2022).<sup>1</sup> These databases contain records of reported occurrences of federal- or State-listed endangered, threatened, rare, or proposed endangered or threatened species, federal species of concern, State species of special concern, or otherwise sensitive species or habitat that may occur in the Planning Area. Lists from the USFWS and CDFW were also reviewed and tables of common and sensitive wildlife and plant species potentially occurring within the Planning Area were generated and are included in Appendix B. This search range encompasses a sufficient distance to accommodate for regional habitat diversity and to overcome the limitations of CNDDDB.<sup>2</sup> See Appendix B for detailed species lists.

### Listed Species

Federal, State, and local authorities under a variety of legislative acts share regulatory authority over biological resources. The CDFW has direct jurisdiction under law for biological resources through the California Fish and Game Code and under the California Endangered Species Act (CESA). The federal Endangered Species Act (FESA) also provides direct regulatory authority over special-status species and their habitats to the USFWS. These acts specifically regulate listed, candidate endangered species, and candidate threatened species, which are defined as follows:

- Endangered Species: any species in danger of extinction throughout all or a significant portion of its range.

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<sup>1</sup> This was done by searching for the U.S. Geological Survey (USGS) *Ukiah and Elledge Peak* along with the ten surrounding 7.5-minute quadrangles.

<sup>2</sup> CNDDDB is based on reports of actual occurrences and does not constitute an exhaustive inventory of every resource.

- **Threatened Species:** any species likely to become an endangered species within the foreseeable future throughout all or a significant part of its range.

### **Special-Status Wildlife**

Based on the CNDDDB search, invertebrate, fish, amphibian, reptile, bird, and mammal species of concern are known or possibly found in the Planning Area. Table 1 of Appendix B identifies animal species with the potential to occur in the Planning Area based on a search of the CNDDDB and USFWS IPaC, and presence of suitable habitat within or adjacent to the Planning Area. Two of these species have both federal, State listing status, and include the following:

- **Federally Threatened and State Threatened**
  - Northern spotted owl (*Strix occidentalis caurina*)
- **Federally Threatened and State Endangered**
  - western yellow-billed cuckoo (*Coccyzus americanus occidentalis*)

Five wildlife species with the potential to occur in the Planning Area have either federal or State protection status and include the following:

- **Federally Threatened**
  - Northern California coast distinct population segment of steelhead (*Oncorhynchus mykiss irideus*, pop. 16)
- **State Endangered**
  - Foothill yellow-legged frog (*Rana boylei*)
  - Bald eagle (*Haliaeetus leucocephalus*)
- **Candidate State Endangered**
  - Western bumblebee (*Bombus occidentalis*)
- **State Threatened**
  - Tricolored blackbird (*Agelaius tricolor*)

State or federally listed species are accorded the highest protection status. In summary, seven special-status species have the potential to occur in the Planning Area.

### *Special-Status Plant Species*

Special-status plant species are defined as endangered or threatened under FESA or CESA, rare under the California Native Plant Protection Act, or considered to be rare (but not formally listed) by resource agencies and the scientific community. CDFW and local governmental agencies may also recognize special-status listings developed by focal groups (i.e., Audubon Society Blue List, CNPS Rare and Endangered Plants, U.S. Forest Service regional lists). Table 2 of Appendix B shows 30 special-status plant species with the potential to occur in the Planning Area, seven of which have State and/or federal listing status (CNPS 2022). These include the following:

- **Federally Endangered and Candidate State Endangered**
  - Sonoma sunshine (*Blennosperma bakeri*)
  - Burke's goldfields (*Lasthenia burkei*)

- **Federally Endangered**
  - Contra Costa goldfields (*Lasthenia conjugens*)
- **State Endangered**
  - Roderick's fritillary (*Fritillaria roderickii*)
  - Boggs Lake hedge-hyssop (*Gratiola heterosepala*)
- **State Threatened**
  - North Coast semaphore grass (*Pleuropogon hooverianus*)
- **State Rare**
  - Baker's meadowfoam (*Limnanthes bakeri*)

#### **d. Special-Status Habitats**

Special-status habitats are vegetation communities, associations, or sub-associations that support concentrations of special-status plant and/or wildlife species, are of relatively limited distribution, or are of particular value to wildlife. Although special-status habitats are not afforded legal protection unless they support special-status species, potential impacts on them may increase concerns and trigger the prescription of mitigation measures by resource agencies for those habitats.

Sensitive habitats are special-status plant communities considered sensitive by federal, State, and local agencies due to their rarity or value in providing habitat for vegetation, fish, and wildlife. Sensitive habitats within five miles of the Planning Area include Northern Interior Cypress Forest and Serpentine Bunchgrass; however, neither of these habitats are found within the Planning Area. Because the Planning Area contains some natural or semi-natural drainages and other natural, undeveloped areas, the following special-status habitats may be present:

- Drainages, wetlands, and associated riparian vegetation under the jurisdiction of CDFW or the Regional Water Quality Control Board (RWQCB) as waters of the State, or U.S. Army Corps of Engineers (USACE) as waters of the U.S.
- Wildlife linkages and corridors

#### **e. Critical Habitat**

Critical habitat is defined in the FESA as a specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. An area is designated as "critical habitat" after USFWS publishes a proposed federal regulation in the Federal Register and then receives and considers public comments on that proposal. The final boundaries of a critical habitat area, once identified, are published in the Federal Register. Critical habitat for northern spotted owl is within five miles of the Planning Area; however, no critical habitats are within the Planning Area.

#### **f. Wildlife Movement Corridors**

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration

corridors, wherein animals periodically move away from an area and then subsequently return. Others may be important as dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network.

The California Essential Habitat Connectivity Project: A Strategy for Conserving Connected California (Spencer et al. 2010) evaluates critical wildlife movement corridors throughout California. Essential Connectivity Areas (ECA) represent the most critical wildlife movement areas for long-term conservation of California's special-status wildlife species. While ECAs do not occur in the Planning Area, the Gube Mountain – Snow Mountain ECA is approximately 1.75 miles southwest of the Planning Area, going north to south crossing the southern end of the Ukiah Valley.

Local wildlife movement corridors may be formed by creeks and drainages, uninterrupted riparian corridors, seasonal wetlands, and other natural areas, and can be used by a range of wildlife. These smaller local movement corridors may provide for access to foraging areas, localized movement associated with breeding, annual dispersal among isolated populations, and local migrations.

## 4.4.2 Regulatory Setting

### a. Federal Regulations

#### **Federal Endangered Species Act**

The Federal Endangered Species Act of 1973 (FESA) and subsequent amendments provide for the conservation of endangered and threatened species, and the ecosystems upon which they depend. FESA is intended to prevent the unlawful "take" of listed fish, wildlife, and plant species. Section 9(a)(1)(B) specifically states take of species listed as threatened or endangered is unlawful. Take is defined as any action that would harass, harm, pursue, hunt, wound, shoot, kill, trap, capture, or collect any threatened or endangered species. Section 10 of the FESA allows the USFWS to issue incidental take permits if take of a listed species may occur during otherwise lawful activities. Section 10(a)(1)(B) requires a Habitat Conservation Plan for an incidental take permit on non-federal lands. Section 7 of the FESA requires federal agencies to aid in the conservation of listed species, and to ensure that the activities of federal agencies will not jeopardize the continued existence of listed species or adversely modify designated critical habitat. The USFWS and the National Oceanic and Atmospheric Administration (NOAA) are responsible for administration of the FESA and have regulatory authority over federally listed species.

#### **Migratory Bird Treaty Act**

The Migratory Bird Treaty Act (MBTA) makes it unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, or kill migratory birds, and prohibits the removal of nests occupied by migratory birds. The USFWS has regulatory authority for the MBTA.

#### **Clean Water Act**

The USACE, under provisions of Section 404 of the Clean Water Act (CWA) and USACE implementing regulations, has jurisdiction over the placement of dredged or fill material into "waters of the United States." Congress enacted the CWA "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." In practice, the boundaries of certain waters subject to USACE jurisdiction under Section 404 have not been fully defined. Previous regulations codified in 1986 defined "waters of the United States" as traditional navigable waters, interstate waters, all

other waters that could affect interstate or foreign commerce, impoundments of waters of the United States, tributaries, the territorial seas, and adjacent wetlands.

On April 21, 2020, the USACE and U.S. Environmental Protection Agency (USEPA) published the Navigable Waters Protection Rule to define “Waters of the United States.” This rule, effective on June 22, 2020, defines four categories of jurisdictional waters, documents certain types of waters that are excluded from jurisdiction, and clarifies some regulatory terms. Under the Navigable Waters Protection Rule, “waters of the United States” include:

1. Territorial seas and traditional navigable waters;
2. Perennial and intermittent tributaries that contribute surface flow to those waters;
3. Certain Lakes and ponds, and impoundments of jurisdictional waters, and;
4. Wetlands adjacent to jurisdictional waters.

Tributaries are defined as “a river, stream, or similar naturally occurring surface water channel that contributes surface water flow to the territorial seas or traditional navigable waters in a typical year either directly or through one or more tributaries, jurisdictional lakes, ponds, and impoundments of jurisdictional waters, or adjacent wetlands.” The tributary category also includes a ditch that “either relocates a tributary, is constructed in a tributary, or is constructed in an adjacent wetland as long as the ditch is perennial or intermittent and contributes surface water flow to a traditional navigable water or territorial sea in a typical year.”

Adjacent wetlands are defined as wetlands that:

1. Abut, meaning to touch at least at one point or side of, a defined Water of the U.S.;
2. Are inundated by flooding from a defined Water of the U.S. in a typical year;
3. Are physically separated from a defined Water of the U.S. by a natural berm, bank, dune, or similar natural features or by artificial dike, barrier or similar artificial structures as long as direct hydrological surface connection to defined Waters of the U.S. are allowed; or,
4. Are impounded of Waters of the U.S. in a typical year through a culvert, flood or tide gate, pump or similar artificial structure.

The Navigable Waters Protection Rule states that the following areas not considered to be jurisdictional waters even where they otherwise meet the definitions described above:

1. Groundwater, including groundwater drained through subsurface drainage systems;
2. Ephemeral features that flow only in direct response to precipitation including ephemeral streams, swales, gullies, rills and pools;
3. Diffuse stormwater runoff and directional sheet flow over uplands;
4. Ditches that are not defined Waters of the U.S. and not constructed in adjacent wetlands subject to certain limitations;
5. Prior converted cropland;
6. Artificially irrigated areas that would revert to upland if artificial irrigation ceases;
7. Artificial lakes and ponds that are not jurisdictional impoundments and that are constructed or excavated in upland or non-jurisdictional waters;
8. Water-filled depressions constructed or excavated in upland or in non-jurisdictional waters for the purpose of obtaining fill, sand, or gravel;

9. Stormwater control features constructed or excavated in uplands or in non-jurisdictional water to convey, treat, infiltrate, or stormwater run-off;
10. Groundwater recharge, water reuse, and wastewater recycling structures constructed or excavated in upland or in non-jurisdictional waters; and,
11. Waste treatment systems.

USACE jurisdictional limits are typically identified by the Ordinary High Water Mark (OHWM) or the landward edge of adjacent wetlands (where present). The OHWM is the “line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding area” (33 CFR 328.3).

The USACE defines wetlands as “those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (33 CFR 328.3). The USACE’s delineation procedures identify wetlands in the field based on indicators of three wetland parameters: hydrophytic vegetation, hydric soils, and wetland hydrology.

## **b. State Regulations**

### **California Endangered Species Act**

The CDFW is responsible for administration of the California Endangered Species Act (CESA). For projects that may affect both a State and federal listed species, compliance with the FESA will satisfy the CESA, provided the CDFW determines that the federal incidental take authorization is consistent with the CESA.

Take is defined in CFGC Section 86 as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” The CESA allows for take incidental to otherwise lawful activities under CFGC Section 2081. Project proponents wishing to obtain incidental take permits are able to do so through a permitting process outlined in California Code of Regulations (CCR) Section 783. Additionally, some sensitive mammals and birds are protected by the state as Fully Protected Mammals or Fully Protected Birds, as described in the CFGC, Sections 4700 and 3511, respectively.

Projects that may result in a take of a California listed species require a take permit under the CESA. The federal and State acts lend protection to species considered rare enough by the scientific community and trustee agencies to warrant special consideration, particularly with regard to protection of isolated populations, nesting or den locations, communal roosts, and other essential habitat. Unlike the FESA, the CESA prohibits the take of not just listed endangered or threatened species, but also candidate species (species petitioned for listing).

The CESA defines an endangered species as:

...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.

A threatened species is defined as:

...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species.

Candidate species are defined as:

...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list.

Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike the FESA, CESA does not include listing provisions for invertebrate species. Article 3, Sections 2080 through 2085, of the CESA addresses the taking of threatened or endangered species by stating:

...no person shall import into this State, export out of this State, or take, possess, purchase, or sell within this State, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided.

### **California Fish and Game Code – Nesting Bird Protection**

According to CFGC Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird [except English sparrows (*Passer domesticus*) and European starlings (*Sturnus vulgaris*)]. Sections 3503 and 3513 prohibit the taking of specific birds, their nests, eggs, or any portion thereof during the nesting season. Section 3503.5 specifically protects birds in the orders Falconiformes and Strigiformes (birds-of-prey). Section 3513 essentially overlaps with the federal MBTA, prohibiting the take or possession of any migratory nongame bird.

### **California Native Plant Protection Act**

The California Native Plant Protection Act (NPPA) was enacted in 1977 and allows the California Fish and Wildlife Commission to designate plants as rare or endangered. Currently, 64 species, subspecies, and varieties of plants are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations. Effective in 2015, CDFW promulgated regulations (14 CCR 786.9) under the authority of the NPPA, establishing that the CESA permitting procedures (CFG Code Section 2081) would be applied to plants listed under the NPPA as "Rare." With this change, there is little practical difference between regulations and protocols for plants listed under CESA and those listed under the NPPA.

### **Clean Water Act Section 401, Porter-Cologne Water Quality Control Act**

The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) have jurisdiction over "waters of the State," which are defined as any surface water or

groundwater, including saline waters, within the boundaries of the state (California Water Code sec. 13050(e)). These agencies also have responsibilities for administering Section 401 of the CWA. In addition, where Federal jurisdiction is not asserted (for example, due to a lack of connectivity to a Relatively Permanent Waters [RPW] and Traditional Navigable Waters [TNW]), RWQCB assert jurisdiction over “waters of the State” pursuant to Section 13263 of the Porter-Cologne Water Quality Control Act, which are defined as any surface water or groundwater, including saline waters, within the boundaries of the State. In this event, the SWRCB may issue general Waste Discharge Requirements (WDRs) regarding discharges to “isolated” waters of the State if limiting criteria are not exceeded (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the USACE to be Outside of Federal Jurisdiction) or project-specific WDRs.

The SWRCB and RWQCBs have not established regulations for field determinations of waters of the state except for wetlands currently. In many cases the RWQCBs interpret the limits of waters of the State to be bounded by the OHWM unless isolated conditions or ephemeral waters are present. However, in the absence of statewide guidance each RWQCB may interpret jurisdictional boundaries within their region and the SWRCB has encouraged applicants to confirm jurisdictional limits with their RWQCB before submitting applications. As determined by the RWQCB, waters of the State may include riparian areas or other locations outside the OHWM, leading to a larger jurisdictional area over a given water body compared to the USACE.

Procedures for defining wetland waters of the State pursuant to the SWRCB’s *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* went into effect May 28, 2020. The SWRCB defines an area as wetland if, under normal circumstances:

- (i) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and the area’s vegetation is dominated by hydrophytes or the area lacks vegetation.

The SWRCB’s *Implementation Guidance for the Wetland Definition and Procedures for Discharges of Dredge and Fill Material to Waters of the State* (2020), states that waters of the U.S. and waters of the State should be delineated using the standard USACE delineation procedures, taking into consideration that the methods shall be modified only to allow for the fact that a lack of vegetation does not preclude an area from meeting the definition of a wetland.

### **California Fish and Game Code Section 1600 et seq.**

Pursuant to CFGC Section 1600, CDFW has authority over all perennial, intermittent, and ephemeral rivers, streams, and lakes in the state, and requires any person, state or local governmental agency, or public utility to notify the CDFW before beginning any activity that would “substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake” that supports fish or wildlife resources.

A stream is defined as a “body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation” (California Code of Regulations, Title 14 Section 1.72). A Lake or Streambed Alteration Agreement may be required for any proposed project that would result in an adverse impact to a river, stream, or lake.



CDFW jurisdiction typically extends to the top of the bank and out to the outer edge of adjacent riparian vegetation if present. However, CDFW can take jurisdiction over a body of flowing water and the landform that conveys it, including water sources and adjoining landscape elements that are byproducts of and affected by interactions with flowing water without regard to size, duration, or the timing of flow (Brady and Vyverberg 2013).

### **CDFW Special Animals List**

Special-status wildlife species are those species included on the CDFW “Special Animals” list (CDFW 2020). “Special Animal” is a general term that refers to all of the taxa the CNDDB is interested in tracking, regardless of their legal or protection status. The CDFW considers the taxa on this list to be those of greatest conservation need. The species on this list generally fall into one or more of the following categories:

- Officially listed or proposed for listing under the CESA and/or FESA
- State or Federal candidate for possible listing
- Taxa that meet the criteria for listing, even if not currently included on any list, as described in
- CEQA Guidelines Section 15380
- Taxa considered by the Department to be a Species of Special Concern
- Taxa that are biologically rare, very restricted in distribution, declining throughout their range, or have a critical vulnerable stage in their life cycle that warrants monitoring
- Populations in California that may be on the periphery of a taxon’s range but are threatened with extirpation in California

### **c. Local**

#### **Creek Maintenance Policies and Procedures**

The City of Ukiah former Paths, Open Space, and Creeks Commission (POSCC) prepared the *Creek Maintenance Policies and Procedures* document at the direction of City Council. The document establishes policies and procedures for City crews and other agencies and organization to follow when performing creek maintenance activities, including vegetation management, culvert and bridge maintenance, and garbage and rubbish removal. Pertinent policies from the *Creek Maintenance Policies and Procedures* document are included below.

#### *Creek Maintenance*

The following creek maintenance policies are intended to address and fulfill the General Plan vision for the preservation of creeks and streams, and to guide City initiated creek maintenance activities.

**Policy 1:** Creek maintenance activities shall not discharge pollutants or deposit new material into the creeks.

**Policy 2:** Creek maintenance activities shall not result in modifications to the natural flow of water or result in a reduction of the water carrying capacity of the creek.

**Policy 3:** Creek maintenance activities shall not result in increased flooding.

**Policy 4:** Creek maintenance activities shall not adversely affect the Riparian Corridor, including Riparian Vegetation, animal wildlife or degrade its visual appearance.

**Policy 5:** Creek maintenance activities shall not degrade the visual quality & natural appearance of the riparian corridor.

**Policy 6:** Creek maintenance activities shall not endanger public or private property.

**Policy 7:** Creek maintenance activities shall not directly or indirectly threaten the public's health or safety.

**Policy 8:** Creek maintenance activities shall not conflict with any Federal Emergency Management Agency (FEMA) regulations for floodway or floodplain management.

**Policy 9:** The Director of Public Works, Director of Planning and Community Development, and Public Works Staff Crew Supervisor shall meet annually with the Paths, Open Space, and Creeks Commission and any interested group, organization, or citizen to discuss issues and problems, and to sound-board solutions.

**Policy 10:** Residents within 100 feet of planned work in a creek or on a creek bank shall receive 72 hours advance notice of the work when feasible.

### *Vegetation Management Procedures*

The following vegetation management procedures are established for City Public Works crews or contract providers performing vegetation management in the creeks:

1. Prior to the start of the rainy season, perform creek reconnaissance to identify obstructions to storm water flow, and document accordingly.
2. The City shall apply for and secure all required permits from the State Department of Fish and Game and any other permitting agency prior to commencing work.
3. City Public Works Staff Supervisor shall meet with City crew or contract provider to discuss the required creek maintenance policies and procedures. Ensure that crew supervisors understand the policies and procedures and how they apply to the specific job being undertaken.
4. The City shall provide direct supervision to all City crew and any contract providers to ensure that the creek maintenance policies are not violated. Copies of the Policies and Procedures shall be provided and explained to all workers.
5. Every effort shall be made to preserve all native riparian trees. No tree shall be removed unless it creates an obvious and significant obstruction to storm water runoff, is in imminent danger of falling and obstructing future storm water flows, or significantly reduces the carrying capacity of the creek. The City Engineer shall have final authority to determine whether an obstruction is obvious and significant.
6. Before any tree is removed, the City Staff Supervisor shall consider the necessity of removal, and whether or not its removal will negatively impact the health of the creek.
7. The pruning of trees shall be limited to branches that create an obvious and significant obstruction to storm water runoff.
8. City Staff Supervisor shall perform routine monitoring of City crew staff or contract providers during the work days to ensure that the creek maintenance policies are not violated.
9. Vegetation removal shall emphasize non-native species such as periwinkle (*Vinca major*), Himalayan blackberry, pampas grass, English ivy, giant reed (*Arundo donax*) and other species. Removal techniques shall be performed by tarping, mowing, root removal, use of hand tools and small machinery and equipment. The use of herbicides shall not be permitted within 25-feet

of the riparian corridor unless it is determined to be the least damaging technique to remove exotic plants.

#### *Culvert and Bridge Maintenance Procedures*

The following procedures are established for culvert and bridge maintenance:

1. Prior to the rainy season, perform creek reconnaissance to identify obstructions to storm water flow, and document accordingly.
2. The City shall apply for and secure all required permits from the State Department of Fish and Game and any other permitting agency prior to commencing work.
3. The City Staff Supervisor shall meet with City crew staff to discuss the City creek maintenance policies and culvert and bridge maintenance procedures. Ensure that crew supervisors understand the policies and procedures.
4. Remove all logs and debris that are blocking culverts, lodged against bridges, or causing a significant obstruction to the flow of storm water.
5. Gravel shall be removed from culverts and redistributed in the stream channel pursuant to the techniques and procedures established by the State Department of Fish and Game.
6. Routinely monitor all culverts and bridges during storm events and remove logs and debris that are obstructing the flow of storm water.

#### *Garbage and Rubbish Removal Procedures*

The following procedures are established for the removal of garbage and rubbish from creeks:

1. City crews shall perform annual creek clean-ups to remove the identified obstructions before the start of the rainy season. The City shall encourage and support volunteer creek clean-up efforts.
2. Identifiable items such as shopping carts shall be reported to the City Code Compliance Coordinator who shall contact the owners and notify them of possible violations of the Ukiah City Code.
3. Support the efforts of community groups, schools, and others who organize volunteer creek clean-up activities.

### **Ukiah City Code (Section 1978 Molesting Wild Animals And Birds)**

Section 1978 of the Ukiah City Code identifies that it shall be unlawful for any person to intentionally molest, harm, frighten, kill, trap, chase, tease, shoot or throw projectiles at any animal, reptile or bird, or remove or have in his possession the young of any wild animal, or the eggs or nest or young of any reptile or bird.

### 4.4.3 Impact Analysis

#### **a. Significance Thresholds and Methodology**

##### *Significance Thresholds*

Based on Appendix G of the *CEQA Guidelines* a project may be deemed to have a significant impact on biological resources if it would:

1. 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 Wildlife or U.S. Fish and Wildlife Service;
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
3. 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;
4. Interfere substantially (i.e., direct/indirect reduction) 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;
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
6. Conflict with the provisions of an adopted Habitat Preservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

##### *Methodology*

The impact analysis is based on available literature regarding the existing biological resources within the Planning Area. Impacts to biological resources were assessed using significance criteria from federal, State, and local regulations. Impacts to flora and fauna may be determined to be significant even if they do not directly affect rare, threatened, or endangered species because development projected by the project may result in indirect impacts to species.

CEQA Statute Section 21001 (c) states that it is the policy of the State of California to “prevent the elimination of fish and wildlife species due to man’s activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities.” Impacts on biological resources may be assessed using impact significance criteria encompassing *CEQA Guidelines* and federal, State, and local plans, regulations, and ordinances.

## b. Project Impacts and Mitigation Measures

**Threshold 1:** Would the project 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 Wildlife or U.S. Fish and Wildlife Service?

**Impact BIO-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD HAVE THE POTENTIAL TO MODIFY HABITAT THAT COULD AFFECT SPECIAL-STATUS SPECIES DURING CONSTRUCTION AND OPERATION. IMPLEMENTATION OF FEDERAL, STATE, AND LOCAL REGULATIONS AND POLICIES, AS WELL AS MITIGATION MEASURES BIO-1, BIO-2, BIO-3, AND BIO-4 WOULD ENSURE RIPARIAN HABITAT AND WETLANDS ARE NOT SIGNIFICANTLY IMPACTED. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

As discussed, in Section 4.4.1, *Setting*, the Planning Area, including the City and Annexation Areas contain habitat for several special-status species. The City and Annexation Areas contain streams, grasslands, riparian woodland and forests, which could be habitat for special status plants and animals, which are identified in Appendix B and include species, such as western pond turtle (*Actinemys marmorata*), foothill yellow-legged frog, Northern spotted owl, special-status birds, Roderick's fritillary (*Fritillaria roderickii*), nesting birds, and roosting bats.

The proposed goals and policies of Ukiah 2040 support growth and development within the City and Annexation Areas. Therefore, development facilitated under the project could have significant impacts to special-status species. However, one of the guiding principles of the project is to manage, conserve, and preserve the existing natural environment to ensure sustainable longevity for present and future generations. All development under the project would be subject to the provisions of the various federal and State natural resources regulations (discussed in Section 4.4.2, *Regulatory Setting*) and their respective permitting processes. These include identification of potential jurisdictional waters and consultation with applicable regulatory agencies. The goals and policies in Ukiah 2040 that would encourage the conservation and protection of public open space and natural resources include the following:

**Goal ENV-1:** Preserve open space land for the commercial agricultural and productive uses, the protection and use of natural resources, the enjoyment of scenic beauty and recreation, protection of tribal resources, and the protection from natural hazards.

**Policy ENV-1.1:** Landscaping Compatibility. The City shall require landscaping in new development to be compatible with preservation and restoration goals of open space management and native vegetation.

**Policy ENV-1.2:** Open Space Management. The City shall manage and maintain City-owned open spaces to preserve the integrity of these public spaces.

**Goal ENV-4:** To conserve and protect the city's natural woodlands and water resources for future generations.

**Policy ENV-4.1:** Habitat Preservation. The City shall require new development to preserve and enhance natural areas that serve, or may potentially serve, as habitat for special-status species. Where preservation is not feasible, the City shall require appropriate mitigation.

**Policy ENV-4.3:** Interconnected Greenways. The City shall require new development to incorporate and facilitate interconnected greenways that support wildlife conservation and recreational purposes.

**Policy ENV-4.4:** River and Creek Preservation. The City shall work cooperatively with the County and private landowners to develop pedestrian access along creeks flowing through the City where safe and feasible to do so and where it will not cause adverse impacts.

**Goal ENV-5:** To ensure the health and viability of the Russian River fisheries and tributaries.

**Policy ENV-5.1:** Local Collaboratives. The City shall participate in local collaborative efforts to restore and preserve the health of the Russian River as a habitat for riparian species.

**Policy ENV-5.2:** Community Education. The City shall work with schools' education providers, and non-profit community groups, to organize educational trips, cleanup days, and similar activities that promote involvement with and knowledge of the Russian River habitat.

**Policy ENV-5.3:** Russian River Riparian Area. The City shall support the County in maintaining the Russian River as a natural riparian corridor.

**Goal ENV-6:** To preserve and restore creeks, streams, riparian areas, and wetlands.

**Policy ENV-6.1:** Restoration Master Plans. The City shall establish a Creek and Stream Restoration Master Plan for each creek flowing through the City limits.

**Policy ENV-6.2:** Contamination and Sedimentation Prevention. The City shall require new development to use site preparation, grading, and construction techniques that prevent contamination and sedimentation of creeks and streams.

**Policy ENV-6.3:** Waterway Restoration. The City shall encourage and provide resources to landowners in the city to remove invasive species, plant native plant species, and prevent pollution from entering local creeks and waterways.

**Policy ENV-6.4:** Waterway Channelization. The City shall actively support the use of natural waterways within the city by avoiding any new waterway channelization within the city and collaborating with local and regional agencies to restore channelized waterways where feasible.

**Policy ENV-6.5:** Creek Protection. The City shall require new development located adjacent to stream corridors to include appropriate measures for creek bank stabilization, erosion and sedimentation prevention, and natural creek channel and riparian vegetation preservation.

**Policy ENV-6.6:** Erosion Control Plans. The City shall require new development that requires significant grading near creeks, streams, wetlands, and riparian areas to prepare erosion control plans that address grading practices that prevent soil erosion, loss of topsoil, and drainageway scour, consistent with biological and aesthetic values.

**Policy ENV-6.7:** Public Open Space. The City shall work with Mendocino County and the Public Spaces Commission to identify and select appropriate locations along creek channels, hillsides, and ridgelines that would be appropriate for future acquisition and development as trails, pocket parks, wildlife preserves, or other public open space.

**Policy ENV-6.8:** Research and Educational Access. The City shall work with public and private landowners adjacent to creeks to allow public access to creeks, streams, waterways, and riparian areas for educational and research programs.

Implementation of these goals and policies would help reduce direct and indirect impacts to habitat for special-status species. However, without a site-specific biological resource assessment, it cannot be determined what impacts a project would have to habitat for special-status species. Therefore,

Mitigation Measure BIO-1 would be implemented, which would require the addition of a policy into Ukiah 2040, requiring the preparation of a Biological Resource Assessment for future projects. In addition, the proposed goals and policies generally aim at protecting sensitive and protected species, if vegetation and trees are to be trimmed or removed during project construction or if construction would occur proximate to trees and vegetation, nesting birds, roosting bats, or other special-status species could be impacted. Therefore, impacts would be potentially significant and Mitigation Measures BIO-2 and BIO-3 would be required for projects with the potential to impact biological resources. Development facilitated by the project would introduce new buildings which may increase the risk of bird strikes. Therefore, this impact would be potentially significant and Mitigation Measure BIO-4 would be required for new buildings that could result in avian collisions.

## **Mitigation Measures**

### *BIO-1 Recommended Policy for Biological Resource Assessment*

The City shall implement the following policy into Ukiah 2040:

**Policy ENV-4.9:** Biological Resource Assessment. The City shall require that new development proposed in or adjacent to ecologically sensitive areas, to complete a site-specific biological resource assessment prepared by a qualified biologist that establishes the existing resources present.

### *BIO-2 Pre-Construction Bird Surveys, Avoidance, and Notification*

For construction activities initiated during the bird nesting season (February 1 – September 15), involving removal of vegetation, abandoned structures, man-made features, or other nesting bird habitat, a pre-construction nesting bird survey shall be conducted no more than 14 days prior to initiation of ground disturbance and vegetation removal. The nesting bird pre-construction survey shall be conducted on foot and shall include a buffer around the construction site at a distance determined by a qualified biologist. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in the Mendocino Region. If nests are found, an avoidance buffer shall be determined by the biologist dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site. The buffer shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s) shall be prepared by a qualified biologist and shall be submitted to the City prior to the commencement of construction activities.

Project site plans shall include a statement acknowledging compliance with the federal MBTA and California Fish and Game Code that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to September 15, and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.

### *BIO-3 Roosting Bat Surveys and Avoidance Prior to Removal*

Prior to tree and structure removal, a qualified biologist shall conduct a focused survey of all trees and structures to be removed or impacted by construction activities to determine whether active roosts of special-status bats are present on site. Tree or structure removal shall be planned for either the spring or the fall, and timed to ensure both suitable conditions for the detection of bats and adequate time for tree and/or structure removal to occur during seasonal periods of bat activity exclusive of the breeding season, as described below. Trees and/or structures containing suitable potential bat roost habitat features shall be clearly marked or identified. If no bat roosts are found, the results of the survey will be documented and submitted to the City within 30 days of the survey, after which no further action will be required.

If day roosts are present, the biologist shall prepare a site-specific roosting bat protection plan to be implemented by the contractor following the City's approval. The plan shall incorporate the following guidance as appropriate:

- When possible, removal of trees/structures identified as suitable roosting habitat shall be conducted during seasonal periods of bat activity, including the following:
  - Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than 0.5 inch of rainfall within 24 hours occurs.
  - Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than 0.5 inch of rainfall within 24 hours occurs.
- If a tree/structure must be removed during the breeding season and is identified as potentially containing a colonial maternity roost, then a qualified biologist shall conduct acoustic emergence surveys or implement other appropriate methods to further evaluate if the roost is an active maternity roost. Under the biologist's guidance, the contractor shall implement measures similar to or exceeding the following:
  - If it is determined that the roost is not an active maternity roost, then the roost may be removed in accordance with the other requirements of this measure.
  - If it is found that an active maternity roost of a colonial roosting species is present, the roost shall not be disturbed during the breeding season (April 15 to August 31).
- Tree removal procedures shall be implemented using a two-step tree removal process. This method is conducted over two consecutive days and works by creating noise and vibration by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery) on day one. The noise and vibration disturbance, together with the visible alteration of the tree, is very effective in causing bats that emerge nightly to feed to not return to the roost that night. The remainder of the tree is removed on day two.
- Prior to the demolition of vacant structures within the project site, a qualified biologist shall conduct a focused habitat assessment of all structures to be demolished. The habitat assessment shall be conducted enough in advance to ensure the commencement of building demolition can be scheduled during seasonal periods of bat activity (see above), if required. If no signs of day roosting activity are observed, no further actions will be required. If bats or signs of day roosting by bats are observed, a qualified biologist will prepare specific recommendations such as partial dismantling to cause bats to abandon the roost, or humane eviction, both to be conducted during seasonal periods of bat activity, if required.



If the qualified biologist determines a roost is used by a large number of bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultation with CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500-foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed. Once it has been determined that the roost is clear of bats, the roost shall be removed immediately.

#### *BIO-4 Bird Safe Design*

Development shall incorporate bird-friendly building materials and design features, including but not limited to the following:

- There are no “see through” passageways or corners.
- Outside lighting is appropriately shielded and directed to minimize attraction to night migrating or nocturnal birds.
- Interior lighting is turned off at night if not in use and designed to minimize light escaping through windows during night operation.
- Landscaping is designed without features known to increase collisions.

The City shall review and approve the bird-friendly building materials and design features prior to project approval.

### **Significance After Mitigation**

Implementation of Mitigation Measures BIO-1, BIO-2, BIO-3 would reduce potential impacts to special-status species, including nesting bird and roosting bats from development facilitated by the project to less than significant levels by requiring pre-construction surveys and avoidance of nesting birds and roosting bats. In addition, implementation of Mitigation Measure BIO-4 would reduce potential bird collision impacts to a less than significant level through the incorporation of bird friendly building and design features on future buildings. As such, impacts to special-status species would be less than significant after mitigation.

<b>Threshold 2:</b>	Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
<b>Threshold 3:</b>	Would the project 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?

**Impact BIO-2 DEVELOPMENT FACILITATED BY THE PROJECT COULD ADVERSELY IMPACT RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITIES DURING CONSTRUCTION AND/OR OPERATION. IMPLEMENTATION OF FEDERAL, STATE, AND LOCAL REGULATIONS AND POLICIES, AS WELL AS MITIGATION MEASURE BIO-1 WOULD ENSURE RIPARIAN HABITAT AND WETLANDS ARE NOT SIGNIFICANTLY IMPACTED. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

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As stated in Section 4.4.1 *Setting*, riparian habitats and other sensitive natural communities have been recorded in and around the Planning Area, including within the City and Annexation Areas. According to the National Wetlands Inventory database (see Figure 4.4-2), Gibson Creek, Doolin Creek, and Orrs Creek are in the City and Annexation Areas and are designated as Freshwater Forested/Shrub Wetland (USFWS 2022). Development near or bisected by sensitive natural communities, waterways and other tributaries and drainages would potentially be subject to USACE, CDFW, and RWQCB permitting requirements.

Development facilitated by the project within or adjacent to sensitive habitats could result in potential direct impacts through removal of vegetation, filling of wetland habitat, compaction of soils, and/or indirect impacts through dust and vegetation thinning. The issuance of a grading permit by the City Engineer for projects requires obtaining other State or federal permits. These include but are not limited to streambed alteration permits from the CDFW and permits for grading in the vicinity of wetlands and certain watercourses from the USACE. These permit clearances may also be required as conditions of approval for grading work to commence. Approval of permits also requires findings that the proposed grading will not result in erosion, stream sediment, or other adverse off-site effects to riparian habitat.

During construction on sites one acre or larger, Stormwater Pollution Prevention Plan Best Management Practices would be required by the NPDES construction general permit and would reduce the potential for eroded soil and contaminants to contaminate a waterbody following a storm event. Additionally, Ukiah City Code Section 9703 provides design standards to address erosion and sedimentation. Development facilitated by the project would employ low impact development techniques and stormwater control measures as outlined in the Ukiah City Code (Section 4, Chapter 8). Impacts related to drainage and pollution are further discussed in Section 4.9, *Hydrology and Water Quality*.

Ukiah 2040 contains proposed goals and policies that would further reduce impacts to riparian and wetland habitats, along with other sensitive natural communities. Goal ENV-4, Policies ENV-4.1 through ENV-4.3, Goal ENV-6, and Policies ENV-6.1 through ENV-6.8 (shown in Impact BIO-1) address development in or near riparian habitat and other sensitive natural communities.

Implementation of these proposed goals and policies would reduce direct and indirect modifications to sensitive natural communities, creeks, embankments, and other waterways. If jurisdictional waters occur on any future development facilitated by the project, jurisdictional delineations and RWQCB permits would be required and would address potential impacts to those waters. In

addition, sensitive natural communities may be impacted by future development, resulting in a potentially significant impact. Mitigation Measure BIO-1 would recommend that a policy be added in Ukiah 2040, to require a Biological Resources Assessment for future projects. The Biological Resources Assessment would identify any sensitive natural communities that might be impacted by future development.

## Mitigation Measures

Mitigation Measure BIO-1 (see Impact BIO-1)

## Significance After Mitigation

If sensitive natural communities are identified during the planning stages as required under Mitigation Measure BIO-1, consultation with federal, state, and local regulatory agencies along with their respective permits would be required. Adherence to state and federal regulations, the Ukiah City Code, Mitigation Measure BIO-1, and implementation of proposed goals and policies would reduce impacts on sensitive natural communities from future development to a less than significant level. Impacts would be less than significant with mitigation.

**Threshold 4:** Would the project 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?

**Impact BIO-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD AVOID IMPACTS TO WILDLIFE MOVEMENT CORRIDORS BY CONSERVING NATURAL AREAS, AS DIRECTED BY PROPOSED POLICIES AND WOULD MINIMIZE IMPACTS TO WILDLIFE MOVEMENT THROUGH IMPLEMENTATION OF MITIGATION MEASURE BIO-1, BIO-2, BIO-3, AND BIO-4. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

Much of the City is developed and urbanized; however riparian corridors and other undeveloped areas in the SOI may provide corridors for wildlife movement, including migratory birds, northern spotted owl, and foothill yellow-legged frog. Ukiah 2040 contains proposed goals and policies that would reduce impacts to wildlife movement. Goal ENV-4, Policies ENV-4.1 through ENV-4.3, Goal ENV-6, and Policies ENV-6.1 through ENV-6.8 (shown in Impact BIO-1) address development in or near wildlife corridors, including riparian habitat and other sensitive natural communities.

Goal ENV-4 and its associated policies identifies that habitat preservation and endangered species protection is a priority for the City. In addition, riparian corridors, which provide corridors for resident and migratory species through the City and Annexation Areas would be protected by Goal ENV-6. Nonetheless, future construction could occur during migration periods or within/near habitat and breeding habitat, and impacts would be potentially significant. Mitigation Measure BIO-1 would be required for projects with the potential to affect wildlife movement. In addition, Mitigation Measures BIO-2, BIO-3, and BIO-4 would be implemented to minimize impacts related to migratory birds and bats.

## Mitigation Measures

Mitigation Measure BIO-1, BIO-2, BIO-3, and BIO-4 (see Impact BIO-1)

## Significance After Mitigation

Implementation of Mitigation Measure BIO-1 would require the addition of a policy in Ukiah 2040, to require a Biological Resources Assessment for future projects. The Biological Resources Assessment would identify the potential for migratory species to occur on development sites during the migration season and would include appropriate measures to reduce impacts to migrating species, such as the northern spotted owl and foothill yellow-legged frog. In addition, Mitigation Measures BIO-2 and BIO-3 would require measures to protect migratory birds and bats. Mitigation Measure BIO-4 would require the implementation of design features to reduce bird collisions, which would help protect migratory birds. Implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, and proposed goals and policies in Ukiah 2040 would reduce impacts to migratory species to less than significant.

**Threshold 5:** Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

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### **Impact BIO-4      DEVELOPMENT FACILITATED BY THE PROJECT WOULD CONFORM WITH APPLICABLE LOCAL POLICIES PROTECTING BIOLOGICAL RESOURCES AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

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Development facilitated by the project would be required to comply with the Ukiah City Code Section 9229 – Tree Preservation and Planting Requirements and Ukiah City Code Section 1978. The Tree Preservation and Protection ordinance provides standards for a tree removal permit and replacement plantings for any protected tree that would be removed during construction. In addition to requiring tree removal permits, the Ordinance requires measures to protect existing trees during construction. The Tree Preservation and Planting Requirements states the importance of trees' preservation and proper maintenance to the health, safety, and welfare of Ukiah citizens. The Ordinance further defines which street trees are permitted and the process of tree planting, alteration, removal, or relocation of trees in public spaces. In addition to the Ukiah City Code Section 1978, the following Ukiah 2040 proposed goals and policies establish guidance protecting biological resources.

**Goal ENV-2:** To maintain and enhance the urban forest to create a sense of urban space and cohesiveness with the surrounding natural environment.

**Policy ENV-2.1:** City Tree Inventories. The City shall update and maintain City tree inventories to support landmark trees preservation and urban biodiversity, including trees designated for streets and parking lots.

**Policy ENV-2.2:** Protect Healthy Trees. The City shall review new construction and landscaping site plans to ensure that healthy trees are not removed unnecessarily.

**Policy ENV-2.3:** Accommodation of Trees along Roadways. The City shall ensure future roadway plans accommodate existing and new trees without compromising sidewalk accessibility.

Implementation of proposed Ukiah 2040 goals and policies would require protection of native and heritage trees consistent with the Ukiah City Code along with habitat, and sensitive natural communities. The project would be consistent with local policies and ordinances. Impacts would be less than significant.

### **Mitigation Measures**

No mitigation measures would be required.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation.

**Threshold 6:** Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

**Impact BIO-5      IMPLEMENTATION OF THE PROJECT WOULD NOT CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN. NO IMPACT WOULD OCCUR.**

There are no habitat conservation plans or natural community conservation plans adopted in the Planning Area, including the City and the Annexation Areas. Therefore, the project and any associated development facilitated by the project would not conflict with any such plans. No impact would occur.

### **Mitigation Measures**

No mitigation measures would be required.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation.

## 4.5 Cultural Resources

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This section analyzes the impacts to cultural resources, including potential impacts to archaeological and historic resources in accordance with CEQA Guidelines Section 15064.5 due to the project. Potential impacts to tribal cultural resources are addressed in Section 4.12, *Tribal Cultural Resources*. Potential impacts to paleontological resources are addressed in Section 4.15, *Paleontological Resources*.

### 4.5.1 Setting

#### **a. Precontact Setting**

During the twentieth century, many archaeologists developed chronological sequences to explain precontact cultural changes within portions of northern California (Moratto 1984; Jones and Klar 2007). The city of Ukiah lies within the Northwest California archaeological region. The following chronology for the region is based on work by Hildebrandt (2007) and Fredrickson (1984) and can be generally divided into four periods: the Pleistocene- Holocene transition (11,500 to 8,000 Before Common Era [B.C.]), the Early Holocene (8,000 to 5,000 B.C.), the Middle Holocene (5,000 to 2,000 B.C.), and the Late Holocene (Post 2,000 B.C.). Archaeologists have identified certain cultural patterns that coincide with the time periods in this chronology.

#### **Pleistocene-Holocene Transition (ca. 11,500 to 8,000 B.C.)**

Although little is known about this period in the Northwest region, the cultural pattern that coincides with this period is referred to as the Post Pattern. Material culture of the Post Pattern includes flaked stone crescents and fluted projectile points. Archaeological sites representative of the Pleistocene-Holocene transition have been found in the Northwest California region near Clear Lake and near Cache Creek in Lake County. Isolated finds dating to this period have been found in Mendocino County and at Bodega Head (Fredrickson 1984; Hildebrandt 2007).

#### **Early Holocene (8,000 to 5,000 B.C.)**

The Early Holocene in Northwest California is primarily categorized by the Borax Lake Pattern, a cultural pattern archaeologists noted throughout the interior of Northwest California that suggests early people were foragers who moved seasonally to find food and supplies (Hildebrandt 2007). This pattern is categorized by large, wide-stemmed projectile points, flake tools, handstones, and millingslabs and is found in a variety of contexts; however, only one Borax Lake Pattern site has been identified near the ocean: HUM-513/H. Site HUM-513/H is a hunting camp located approximately two kilometers from the coast that appears to have focused on hunting Roosevelt elk (Fredrickson 1984; Hildebrandt 2007). Around 6,500 B.C., archaeologists noted another cultural pattern, the Berkeley Pattern, early representations of which appear around the Clear Lake area. The Berkeley Pattern is characterized by stable, long-term settlements, formal burial patterns, the use of a pestle to process acorns, and a separation of daily living areas and burial sites (Hildebrandt 2007).

#### **Middle Holocene (5,000 to 2,000 B.C.)**

The Middle Holocene is poorly represented in the Northwest California archaeological record, particularly the early part of the period (Hildebrandt 2007). North of Cape Mendocino, no evidence

of humans has been identified until after 3,000 B.C., when the Mendocino Pattern begins. Artifacts representing this cultural pattern include various projectile points, handstones and millingslabs, and several types of flake tools. Most Mendocino Pattern sites appear to be temporary camps or short-term residential bases where people lived seasonally, gathering food and other resources from nearby.

### **Late Holocene (Post 2,000 B.C.)**

The Late Holocene in the North Coast region of Northwest California exhibits a continuation of the Mendocino Pattern of the Middle Holocene, though by A.D. 500 it does not spread north of Central Mendocino County. After A.D. 500, archaeologists note a significant change in the archaeological record represented by the emergence of the Gunther Pattern in the north and the Augustine Pattern in the south. The Gunther Pattern, which spans from the Sonoma-Mendocino County line to the California-Oregon border, is represented by Gunther barbed projectile points and concave-based points used on harpoons, ground and polished stone artifacts, and artistic items.

Archaeologists interpret this pattern as evidence of specialized riverine and coastal adaptation by indigenous groups. Gunther Pattern sites have defined living spaces, cemeteries, storage spaces, and midden areas for discarding refuse. South of the Sonoma-Mendocino county line, the Augustine Pattern is not as tightly defined. Some sites appear to have been visited seasonally (SON-458, SON-250/H, and SON-670/H) while others seem to have been lived in year-round, like sites that have characteristics of the Berkeley Pattern (SON-159 and SON-348/H). Common aspects of the Augustine Pattern include the presence of Olivella and clamshell disk beads and Haliotis ornaments, and partial or full cremations of deceased individuals (Hildebrandt 2007).

### **b. Ethnographic Background**

The City of Ukiah is in the traditional ancestral lands of the Northern Pomo, which early ethnographers described as spanning along the coast from Fort Bragg to the Navarro River and stretching eastward to Clear Lake. Ethnographers referred to the people in this indigenous group as the Northern Pomo because they spoke of one of the seven Pomo language dialects that ethnographers distinguished based on geographic location (McLendon and Oswalt 1978; Golla 2007). Thus, the Northern Pomo lands were bordered to the south by the Central Pomo and to the east by Eastern Pomo. Ethnographers noted Yukian groups living to the north (Welch 2013).

The ethnographic Pomo lived in a series of independent groups of several hundred to 1,000 people that ethnographers referred to as tribelets. Most tribelet groups were named after the geographical area where they lived. Ethnographers also described smaller Pomo village communities with fewer people, who moved between different territories as the seasons changed and existed with a variety of land and resources including coastal areas, forests, riversides, and valleys. They built dome-shaped winter shelters with sunken floors covered in thick grass, and summer shelters from brush and light grasses. Pomo villages usually had a sweat house and meeting house (Barrett 1908).

Ethnographic Pomo villages were governed by councilmen or captains called *tca ka-li* who largely acted as advisors and had limited authority. Ethnographers classified two types of captains in Northern Pomo villages, the Lesser Captain and the Big Captain. The Lesser Captain was charged with considering the general community welfare of the larger family units, while the Big Captain served to assist with more overarching decisions, such as settling feuds and disputes (Barrett 1908).

Obtaining food and other resources were part of the overall lifeways for the ethnographic Pomo, and typically involved hunting, gathering, and fishing. Acorns were a primary staple, and they were gathered in the fall and stored for winter (Bean and Theodoratus 1978). Other important plants

included Buckeye nuts, berries, and seeds from at least 15 types of grasses, roots, and bulbs. Big game included deer, elk, and antelope. Pomo material goods included obsidian and chert tools, intricate basketry, and other tools, games, and other implements made from bone and shell (Bean and Theodoratus 1978).

### **c. Historic Setting**

Post-Contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period when California became a territory of the United States.

#### **Spanish Period (1769 – 1822)**

Spanish explorers made sailing expeditions along the coast of California between the mid-1500s and mid-1700s. In 1542, Juan Rodriguez Cabrillo led the first European expedition to observe what was known by the Spanish as Alta (upper) California. For more than 200 years, Cabrillo and other European explorers sailed the Alta California coast and made limited inland expeditions, never establishing permanent settlements (Bean 1968; Rolle 2003). In 1769, the Spanish crown laid claim to Alta California based on the surveys conducted by Cabrillo and Sebastian Vizcaíno (Bancroft 1885; Gumprecht 1999).

By the 18th century, Spain developed a three-pronged approach to secure its hold on the territory and counter against other foreign explorers with the institution of military forts known as presidios, missions (churches), and pueblos (towns) throughout Alta California. The missions and presidios were constructed to integrate the Native American populations into Christianity and communal enterprise, as well as to establish settlements for Spanish settlers. In 1769, Captain Gaspar de Portola led overland expeditions of California, establishing Spanish settlements along the way. At the same time, Franciscan Father Junípero Serra founded Mission San Diego de Alcalá, the first of the 21 missions established in Alta California between 1769 and 1823. The closest mission to the City of Ukiah was Mission San Francisco Solano founded in 1823 in Sonoma, California as the 21st California Mission (California Missions 2022). The mission is approximately 70 miles south of Ukiah.

Spain began issuing land grants for vast swaths of land known as ranchos in 1784. The ranchos were typically granted to retiring soldiers. The grantees were only permitted to inhabit and work the land as the land titles technically remained property of the Spanish king (Livingston 1914). Alta California was eventually referred to as the colony of New Spain by the Spanish.

#### **Mexican Period (1822 – 1848)**

Several factors kept growth within New Spain to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Dallas 1955).



Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts.

### **American Period (1848 – Present)**

The United States went to war with Mexico in 1846. The war ended in 1848 with the Treaty of Guadalupe Hidalgo, ushering California into its American Period (Kyle 2002). California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as U.S. territories (Waugh 2003). Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the California economy through 1850s. The discovery of gold in the northern part of the state led to the Gold Rush beginning in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods.

A severe drought in the 1860s decimated cattle herds and drastically affected rancheros' source of income. In addition, property boundaries that were loosely established during the Mexican era led to disputes with new incoming settlers, problems with squatters, and lawsuits. Rancheros often were encumbered by debt and the cost of legal fees to defend their property. As a result, much of the rancho lands were sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944).

### **Local History**

The area surrounding Ukiah was historically part of the Yokayo Rancho, granted in 1845 by Governor Pío Pico to Cayetano Juarez. Juarez, captain of a militia, was already in possession of the land grant for Rancho Tucolay, located in present-day Napa County. The City of Ukiah was within the Yokayo land grant boundary and the city derived its name phonetically from Yokayo in the 1850s. Sam Lowery is the first individual of record to have established a settlement in the area by 1856, which he sold to A.T. Perkins within a year (Kyle 2002). One of the earliest establishments in the area was the Vichy Hot Springs, east of Ukiah. The hot springs were originally used by the Pomo tribes but were taken over by settlers who established a resort in 1854, which is still in operation today (Kyle 2002). The resort made Ukiah into a popular stopping point and was visited by several notable people, including Jack London, Mark Twain, and Presidents Grant and Harrison (Bergere 2009).

Mendocino County was formed with the creation of California in 1850, and Sonoma County officials administered the affairs of both counties until 1859 when Ukiah was selected as the county seat. At the time only 100 people were living in the Russian River Valley (Kyle 2002). By 1860 the town was surveyed and mapped, and it was incorporated in 1876. The rich river-bottom soils of the Ukiah Valley made the area well-suited for farming; therefore, Ukiah's early economy was largely based on agriculture. The Johnson, Cunningham, and Thomas families established the earliest farms and pear orchards in the valley (Bergere 2009). As the area was also rich in dense forests, lumber was also a dominant economic driver in the area (Bergere 2009). The arrival of the railroad in 1889 led to increased residential and commercial development (ACHP 2022). Expanding beyond the original town settlement along State Street, Ukiah now extended west to Thompson Street and north to Todd Street (ProQuest 2022).

Into the late 1800s and early 1900s, Ukiah continued to grow as a city. The Ukiah Latitude Observatory was established in 1899 as part of a worldwide network located on the 39th parallel to measure variation in latitude, because of the wobble of the earth's axis. By 1911, the city had

expanded north to Low Gap Road and west to South Highland Avenue (ProQuest 2022). With special excursion-rate train tickets and, in the 1920s, the promotion of the Redwood Highway (U.S. Highway 101), tourism took hold. Several wineries opened in the area in the 1930s including the Parducci Winery in 1931, which was the northern-most winery in California for several years (Kyle 2002). Along with tourism, wineries became a viable economic source for the city up to the present. After World War II, the lumber boom of the late 1940s supported a large part of Ukiah's early population, as the logging of redwoods was a major industry at that time (ACHP 2022). To support the expanding population, post-war Federal Housing Administration housing tracts were constructed south, east, and north of downtown, but their development was limited compared to other cities in California (UCSB 2022). Development was limited until the 1980s when U.S. Highway 101 was expanded and former agricultural fields around the highway were developed with housing and commercial uses (NETR Online 2022).

#### **d. Previously Identified Cultural Resources**

A review of the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) shows that Ukiah contains five historic properties listed on the NRHP, two resources listed as California State Landmarks, and no resources listed as California Points of Historical Interest. Resources listed on the NRHP are automatically listed on the CRHR, and no additional resources are listed on the CRHR.

- **NRHP and CRHR Listed Resources**

- Held-Poage House
- Charles Hofman House
- Palace Hotel
- Sun House
- Ukiah Main Post Office

- **California State Landmarks**

- Sun House
- Ukiah Vichy Springs Resort

A review of the State Office of Historic Preservation Built Environment Resource Directory (BERD) shows approximately 250 built environment resources have been surveyed within the City of Ukiah and each have been given one or more of the following status codes:

- 1S: "Individual property listed in NR [National Register] by the Keeper. Listed in the CR [California Register]."
- 3S: "Appears eligible for NR as an individual property through survey evaluation."
- 5S2: "Individual property that is eligible for local listing or designation."
- 6Y: "Determined ineligible for NR by consensus through Section 106 process – Not evaluated for CR or Local Listing."
- 7N: "Needs to be reevaluated (Formerly NR Status Code 4)".

Though resources have been recommended eligible for local listing, the City of Ukiah does not have a local preservation ordinance or adopted register, as further discussed below.

## Local Inventory of Historic Resources

The City of Ukiah's 1985 "Historic Resources Survey" (prepared by Historic Environmental Consultants), which was updated in 1999 by the "City of Ukiah Architectural Survey" (prepared by P.S. Preservation Services) identified 23 properties (both residential and commercial) with local historic importance within the City limits. Although the survey was updated in 1999, it was never adopted by the City Council.

Ukiah 2040 (Environment and Sustainability Element, Section 6.2) lists four historic-period properties in the Planning Area: the City of 10,000 Buddhas, two miles east of Ukiah; the Vichy Springs Resort, a California Historical Landmark; and the former Finnish colony in Calpella; and the Palace Hotel.

A records search of the California Historical Resources Information System (CHRIS) at the Northwest Information Center (NWIC) was conducted in August 2022. The search identified a total of 216 cultural resources within the Planning Area. These resources can be divided into the following categories:

- Nine of these resources are archaeological sites (three precontact sites, three historic-era sites, and three multicomponent sites with both historic and precontact elements).
- One resource (Leslie Street) is a stand-alone structure.
- One resource (the Northwestern Pacific Railroad) is a structure, object, and a contributing element to a district.
- Five historic districts are listed as resources within the Planning Area, with three located within the City: The Ukiah Vichy Springs Mineral Resort, the Bench and Bar Historic District, The Albertimun School Historic District (City), The Ukiah Cemetery Historic District (City), and the Todd Grove Municipal Park Historic District (City). The Ukiah Vichy Springs Mineral Resort district has an archaeological component. The McGarvey Park Cemetery (City) is itself also listed as a resource.
- The remaining 199 resources are buildings, eight of which are contributing elements to one of the five historic districts.

### 4.5.2 Regulatory Setting

Cultural resources, including built environment and archaeological resources, may be designated as significant by National, State, or local authorities. In order for a resource to qualify for listing in the NRHP and the CRHR, it must meet one or more identified criteria of significance. The resource must also retain sufficient historic integrity, defined in *National Register Bulletin 15* as the "ability of a property to convey its significance" (National Park Service [NPS] 1990).

#### a. Federal Regulations

##### National Register of Historic Places

Although the project does not have a federal nexus, properties which are listed in or have been formally determined eligible for listing in the NRHP are automatically listed in the CRHR. The following is therefore presented to provide applicable regulatory context. The NRHP was established by the National Historic Preservation Act of 1966 as "an authoritative guide to be used by Federal, state, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or

impairment” (36 Code of Federal Regulations 60.2). The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it meets any one of the following criteria:

- **Criterion A:** Are associated with events that have made a significant contribution to the broad patterns of our history.
- **Criterion B:** Are associated with the lives of persons significant in our past.
- **Criterion C:** Embody the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.
- **Criterion D:** Have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined in the following manner:

- **Location:** The place where the historic property was constructed or the place where the historic event occurred.
- **Design:** The combination of elements that create the form, plan, space, structure, and style of a property.
- **Setting:** The physical environment of a historic property.
- **Materials:** Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- **Workmanship:** The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- **Feeling:** A property’s expression of the aesthetic or historic sense of a particular period of time.
- **Association:** The direct link between an important historic event or person and a historic property.

## **b. State Regulations**

### **California Register of Historical Resources**

The California Register of Historic Resources (CRHR) is a guide to cultural resources that must be considered when a government agency undertakes a discretionary action subject to CEQA. The CRHR helps government agencies identify, evaluate, and protect California’s historical resources, and indicates which properties are to be protected from substantial adverse change (Public Resources Code, Section 5024.1(a)). The CRHR is administered through the State Historic Preservation Office that is part of the California State Parks system.

A cultural resource is evaluated under four CRHR criteria to determine its historical significance. A resource must be significant at the local, state, or national level in accordance with one or more of the following criteria set forth in the *CEQA Guidelines* Section 15064.5(a)(3):

1. It is associated with events that have made a significant contribution to the broad pattern of California's history and cultural heritage;
2. It is associated with the lives of persons important in our past;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. It has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the above criteria, the CRHR requires that sufficient time must have passed to allow a "scholarly perspective on the events or individuals associated with the resource." Fifty years is used as a general estimate of the time needed to understand the historical importance of a resource according to SHPO publications. The CRHR also requires a resource to possess integrity, which is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association." Archaeological resources can also qualify as "historical resources" (*CEQA Guidelines*, Section 15064.5(c)(1)).

According to CEQA, all buildings constructed over 50 years ago and that possess architectural or historical significance may be considered potential historical resources. Most resources must meet the 50-year threshold for historic significance; however, resources less than 50 years in age may be eligible for listing on the CRHR if it can be demonstrated that sufficient time has passed to understand their historical importance.

In addition, if a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to permit any or all these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (Public Resources Code [PRC], Section 21083.2[a], [b], and [c]).

PRC, Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Two other programs are administered by the state: California Historical Landmarks and California "Points of Historical Interest." California Historical Landmarks are buildings, sites, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value. California Points of Historical Interest are buildings, sites, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value.

Impacts to significant cultural resources that affect the characteristics of any resource that qualify it for the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from

physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, such that the significance of an historical resource would be materially impaired (CEQA Guidelines Section 15064.5 [b][1], 2000). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register... (CEQA Guidelines Section 15064.5[b][2][A]).

## **Codes Governing Human Remains**

*CEQA Guidelines* Section 15064.5 also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. The disposition of human remains is governed by Health and Safety Code Section 7050.5 and PRC Sections 5097.94 and 5097.98, and falls within the jurisdiction of the Native American Heritage Commission (NAHC). If human remains are discovered, the County Coroner must be notified within 48 hours and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to PRC Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

## **Senate Bill 18**

Enacted on March 1, 2005, Senate Bill 18 (SB 18) (California Government Code Sections 65352.3 and 65352.4) requires cities and counties to notify and consult with California Native American tribal groups and individuals regarding proposed local land use planning decisions for the purpose of protecting traditional tribal cultural places (sacred sites), prior to adopting or amending a General Plan or designating land as open space. Tribal groups or individuals have 90 days to request consultation following the initial contact. SB 18 is further discussed in Section 4.15, *Tribal Cultural Resources*.

## **Assembly Bill 52**

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." Assembly Bill 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and meets either of the following criteria:

- a) 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 section 5020.1(k), or
- b) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the project if the tribe has requested notice of projects proposed within the jurisdiction of the lead agency. AB 52 is further discussed in Section 4.15, *Tribal Cultural Resources*.

## **Ukiah City Code**

The Downtown Zoning Code (Ukiah City Code Section 9227.1) contains development standards and regulations pertaining to demolition, rehabilitation, conversion, and alteration of buildings located on the City's local historical inventory and for buildings over the age of 50 years old within the Downtown Zoning Code district(s). All proposed modifications to buildings listed on the City's inventory must comply with these standards, and demolition requires review in accordance with Ukiah City Code 3016, as described below.

Pursuant to Ukiah City Code Section 3016(b), buildings over 50 years old proposed for demolition that do not meet the exemption criteria of being either an immediate safety hazard, or an accessory building that is not listed on the local historic inventory, shall be reviewed for their historic or architectural significance. Specifically, the City's Demolition Review Committee shall review the proposal and make a recommendation to the Ukiah City Council. Per Ukiah City Code Section 3016(e), which stated the following:

In reviewing proposed permits, and formulating recommendations to the city council, the demolition review committee shall consider any information provided during the meeting, and shall use the following criteria. The structure:

- 1. Has a special or particular quality such as oldest, best example, largest, or last surviving example of its kind; or
- 2. Exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, or architectural history; or
- 3. Is strongly identified with persons or events significant in local, state, or national history.

Per Ukiah City Code Section 3016(f), if the Demolition Review Committee finds that any of the criteria listed in subsection (e) apply to the building proposed for demolition, it shall recommend denial of the permit to the City Council. This section of the Ukiah City Code also describes procedures for review by the City Council.

### **4.5.3 Impact Analysis**

#### **c. Significance Thresholds and Methodology**

##### **Significance Thresholds**

According to Appendix G of the *CEQA Guidelines*, impacts related to cultural resources from implementation of the project would be significant if it would:

1. Cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5;

2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
3. Disturb any human remains, including those interred outside of dedicated cemeteries.

## **Methodology**

The significance of a cultural resource and subsequently the significance of an impact to a resource is determined by consideration of whether that resource can increase our knowledge of the past and the importance of that resource to cultural groups, among other things. The determining factors are site content and degree of preservation. A finding of archaeological significance follows the criteria established in the *CEQA Guidelines*. *CEQA Guidelines* Section 15064.5 (Determining the Significance of Impacts to Archaeological Resources) states the following:

- (3) [...] Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code, Section 5024.1, Title 14 CCR, Section 4852).
  - (4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.
- (b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

Historical resources are “significantly” affected if there is demolition, destruction, relocation, or alteration of the resource or its surroundings. Generally, impacts to historical resources can be mitigated to below a level of significance by following the *Secretary of the Interior’s Guidelines for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* [Guidelines Section 15064.6(b)]. Documentation of a historical resource by way of historic narrative photographs or architectural drawings will not mitigate the impact of demolition below the level of significance [Guidelines Section 15126.4(b)(2)]. Preservation in place is the preferred form of mitigation for archaeological resources, as it retains the relationship between artifact and context, and may avoid conflicts with groups associated with the site [Guidelines Section 15126.4 (b)(3)(A)]. If an archaeological resource does not meet either the historical resource or the more specific “unique archaeological resource” definition, impacts do not need to be mitigated [Guidelines Section 15064.5(e)]. Where the significance of a site is unknown, it is presumed to be significant for the purpose of this EIR investigation.



## Project Impacts and Mitigation Measures

**Threshold 1:** Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

**Impact CUL-1** DEVELOPMENT FACILITATED BY THE PROJECT WOULD HAVE THE POTENTIAL TO IMPACT HISTORICAL RESOURCES. EXISTING UKIAH CITY CODE AND CEQA REGULATIONS, IN ADDITION TO PROPOSED UKIAH 2040 POLICIES AND MITIGATION WOULD REDUCE IMPACTS TO HISTORIC RESOURCES. NONETHELESS, IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

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Based on *CEQA Guidelines* Section 15064.5, development facilitated by Ukiah 2040 would have a significant impact on historical resources if it would cause a substantial adverse change in the significance of a historical resource.

In the Planning Area, there are five historic districts with three located within the City, 199 historic-era buildings, two structures identified by the CHRIS records search, and an additional 51 buildings identified by the BERD. Because these districts and properties contain buildings and/or structures 50 years or older, they have the potential to qualify as historical resources. Future development projects could potentially impact historical resources throughout the City. Other buildings may reach 50 or more years of age over the lifetime of Ukiah 2040. As such, future studies may identify properties eligible for listing in the NRHP or CRHR and would qualify as historical resources pursuant to CEQA.

The Environment and Sustainability Element of Ukiah 2040 contains the following proposed goals and policies related to historical resources:

**Goals ENV-3:** To preserve and protect historic and archaeological resources in Ukiah.

**Policy ENV-3.1:** Historic Designations. The City shall support the listing of eligible properties, sites, and structures as potential historic designations and their inclusion in the California Register of Historical Resources and National Register of Historic Places.

**Policy ENV-3.5:** Educational Outreach. The City shall coordinate with the museum to provide education to the public on how to protect sites and structures.

**Policy ENV-3.6:** City-Owned Historic Sites and Structures. The City shall maintain, preserve, and improve City-owned historic structures and sites in an architecturally and environmentally sensitive manner.

**Policy ENV-3.7:** Adaptive Reuse. The City shall encourage appropriate adaptive reuse of historic resources.

These proposed goals and policies are intended to support designation and protection of cultural resources. Impacts on built environment historical resources can only be determined once a specific project has been proposed. This is because the effects are highly dependent on both the individual resource and the characteristics of the proposed activity. As such, impacts would be potentially significant. Adherence to the Ukiah City Code (Sections 3016 and 9227.1) ensures that buildings listed on the City's local inventory are reviewed and protected for their historic significance. Specifically, Section 9227.1 contains development standards and regulations pertaining to demolition, rehabilitation, conversion and alteration of buildings located on the City's local inventory and for buildings over the age of 50 years old within the Downtown Zoning Code district(s), where many of the City's locally-historic buildings are located. Ukiah City Code Section

3016 requires review by both the Demolition Review Committee and City Council for demolition or significant alteration of a building over the age of 50 years old or those listed on the City's local inventory. Lastly, Mitigation Measure CUL-1 would require a historical resources study for built environment resources and specific measures to reduce impacts to the maximum extent feasible. Archaeological resources that may be considered historical resources are addressed in Impact CUL-2.

## **Mitigation Measures**

### *CUL-1 Historical Resources Study Program*

The City shall require project applicants for discretionary projects to investigate the potential to impact historical resources. For a project involving a property that contains buildings structures, objects, sites, landscape/site plans, or other features that are 50 years of age or older, a historical resources study shall be conducted to determine if the project would demolish or otherwise alter the characteristics that make a historical resource eligible for inclusion in the CRHR. The study shall, at a minimum, be conducted by a qualified professional meeting the Secretary of the Interior's (SOI) Professional Qualifications Standard (PQS) for architectural history (NPS 1983). The study shall include a pedestrian survey of the project site and background research including a records search at the Northwest Information Center (NWIC), building permit research, and/or research with the local historical society(ies). The subject property(ies) and/or structures shall be evaluated for federal (as applicable), and state significance on California Department of Parks and Recreation 523 series forms, included as an appendix to the study.

If historical impacts are identified, the study shall include recommendations to avoid or reduce impacts on historical resources and the project sponsor shall implement the recommendations or conduct additional environmental review. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the implementing agency for review.

Efforts shall be made to the greatest extent practical to ensure that the relocation, rehabilitation, or alteration of the resource is consistent with the Secretary of the Interior's Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR Section 15126.4(b)(1)). Application of the Standards shall be overseen by a qualified architectural historian or historic architect meeting the PQS. In conjunction with any development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the implementing agency for review and concurrence.

If significant historical resources are identified on a development site and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures may include documentation of the historical resource in the form of a Historic American Building Survey (HABS) report. The report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be

completed by a qualified architectural historian or historian who meets the PQS and submitted to the implementing agency prior to issuance of any permits for demolition or alteration of the historical resource. Copies of the report shall be provided to a local library and/or other appropriate repositories.

### Significance After Mitigation

Development facilitated by the Ukiah 2040 would have the potential to impact historical resources. Existing Ukiah City Code and CEQA regulations, in addition to proposed Ukiah 2040 policies and Mitigation Measure CUL-1 would minimize site specific impacts to historic structures. However, redevelopment or demolition that may be required to implement projects facilitated by Ukiah 2040 may result in the permanent loss or damage to historic structures. Although implementation of Mitigation Measure CUL-1 would reduce impacts to the extent feasible, some project-specific impacts could result in the demolition or other impairments of a historical resource's historical significance. Therefore, impacts would be significant and unavoidable.

**Threshold 2:** Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

#### **Impact CUL-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD HAVE THE POTENTIAL TO IMPACT ARCHAEOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

As discussed in the Section 4.5.1, *Setting (Previously Identified Cultural Resources)*, the CHRIS records search identified nine archaeological sites within the City, which include both precontact and historic-era archaeological components. Additionally, the Ukiah Vichy Springs Mineral Resort also includes an archaeological component. The Northern Pomo, Spanish, Mexican, and American settlers historically inhabited the Planning Area, including the areas within City limits and Annexation Areas; therefore, in addition to known resources, remnants of these past cultures could be buried or obscured in undeveloped portions of the City and Annexation Areas, or in areas that were developed before environmental regulations and cultural resource protection laws were passed. Implementation of the project therefore has potential to impact known and unknown archaeological resources. Effects on archaeological resources can only be determined once a specific project has been proposed. This is because the effects are highly dependent on both the individual project site conditions and the characteristics of the proposed ground-disturbing activity. Ground-disturbing activities have the potential to damage or destroy previously-unknown historic or precontact archaeological resources, particularly in areas that have not been previously developed with urban uses or studied in a cultural resources investigation, or when excavation depths exceed those from past projects. Consequently, damage to or destruction of previously unknown sub-surface cultural resources could occur because of Ukiah 2040.

The Environment and Sustainability Element of Ukiah 2040 contains the following proposed goals and policies related to reducing impacts on archaeological resources.

**Goals ENV-3:** To preserve and protect historic and archaeological resources in Ukiah.

**Policy ENV-3.2:** Archaeological Resource Impact Mitigation. The City shall ensure appropriate and feasible mitigation for new development that has the potential to impact sites likely to contain archaeological, paleontological, cultural, or tribal resources.

**Policy ENV-3.3:** Protect Archaeological Resources. The City shall require any construction, grading, or other site altering activities cease if cultural, archaeological, paleontological, or cultural resources are discovered until a qualified professional has completed an evaluation of the site.

**Policy ENV-3.4:** Tribal Consultation. The City shall proactively engage local Native American tribes in the planning process, particularly when matters related to Native American culture, heritage, resources, or artifacts may be affected.

Development associated with Ukiah 2040 would largely be infill projects on undeveloped or underutilized sites that have previously been disturbed. The proposed goals and policies ENV-3.2, ENV-3.3, and ENV-3.4 would protect important cultural and archaeological resources. Nonetheless, impacts on archaeological resources can only be determined once a specific project has been proposed. Therefore, impacts on archaeological resources, including those that may be considered historical resources would be potentially significant and Mitigation Measure CUL-2 would be implemented, requiring preparation of cultural resource studies.

## **Mitigation Measures**

### *CUL-2 Archaeological Resources Study Program*

The City shall require project applicants for discretionary projects to investigate the potential to disturb archaeological resources. If preliminary reconnaissance suggests that cultural resources may exist, a Phase I cultural resources study shall be performed by a qualified professional meeting the Secretary of the Interior's (SOI) Professional Qualifications Standard (PQS) for archaeology (NPS 1983). A Phase I cultural resources study shall include a pedestrian survey of the project site and sufficient background research and, as necessary, field sampling to determine whether archaeological resources may be present. Archival research shall include a records search at the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search with the Native American Heritage Commission (NAHC), and coordination with Native American tribes listed by the NAHC. The Phase I technical report documenting the study shall include recommendations to avoid or reduce impacts on archaeological resources, such as establishing environmentally-sensitive areas excluded from project activities, archaeological and/or Native American monitoring, or redesign of the project to avoid known cultural resources. The project sponsor shall implement the recommendations prior to and during construction.

## **Significance After Mitigation**

Implementation of Mitigation Measure CUL-2 would reduce impacts on archaeological resources by requiring archaeological resource studies for projects within the City, and the implementation of further requirements to avoid or reduce impacts on those resources, on a project-by-project basis. With the required project-level review, it is expected that impacts on archaeological resources would be less than significant with mitigation incorporated.

<b>Threshold 3:</b> Would the project disturb any human remains, including those interred outside of formal cemeteries?
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**Impact CUL-3**      **GROUND-DISTURBING ACTIVITIES ASSOCIATED WITH DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN DAMAGE TO OR DESTRUCTION OF HUMAN BURIALS. HOWEVER, COMPLIANCE WITH EXISTING REGULATIONS ON HUMAN REMAINS WOULD ENSURE LESS THAN SIGNIFICANT IMPACTS.**

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Human burials outside of formal cemeteries often occur in precontact archeological contexts. Although much of the City is built out, the potential still exists for human burials to be present. Excavation during construction activities would have the potential to disturb these resources, including Native American burials.

Human burials, in addition to potentially being associated with archaeological resources, have specific provisions for treatment in Section 5097 of the California Public Resources Code. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) has specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains; protects them from disturbance, vandalism, or destruction; and established procedures to be implemented if Native American skeletal remains are discovered. Public Resources Code Section 5097.98 also addresses the disposition of Native American burials, protects such remains, and gives responsibility to the NAHC to resolve any related disputes.

Development facilitated by the project would be required to adhere to existing regulations regarding the treatment of human remains. Therefore, impacts related to disturbing human remains due to Ukiah 2040 would be less than significant.

### **Mitigation Measures**

No mitigation measures would be required.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation.

## 4.6 Greenhouse Gas Emissions

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This section summarizes the setting for greenhouse gas (GHG) emissions and climate change and analyzes the impacts related to GHG emissions and climate change due to the project.

### 4.6.1 Setting

#### a. Greenhouse Gases and Climate Change

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO<sub>2</sub>); methane (CH<sub>4</sub>); nitrous oxides (N<sub>2</sub>O); fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs); and sulfur hexafluoride (SF<sub>6</sub>). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO<sub>2</sub>) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as “carbon dioxide equivalent” (CO<sub>2</sub>e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a 100-year GWP of 30, meaning its global warming effect is 30 times greater than CO<sub>2</sub> on a molecule per molecule basis (United Nations Intergovernmental Panel on Climate Change [IPCC] 2021).<sup>1</sup>

GHGs are emitted by natural processes and human activities. Of these gases, CO<sub>2</sub> and CH<sub>4</sub> are emitted in the greatest quantities from human activities. Emissions of CO<sub>2</sub> are usually by-products of fossil fuel combustion, and CH<sub>4</sub> results from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO<sub>2</sub>, include fluorinated gases and SF<sub>6</sub> (United States Environmental Protection Agency [USEPA] 2021a).

Climate change is the observed increase in the average temperature of the Earth’s atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term “climate change” is often used interchangeably with the term “global warming,” but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The United Nations Intergovernmental Panel on Climate Change (IPCC) expressed in their Sixth Assessment Report that the rise and continued growth of atmospheric CO<sub>2</sub> concentrations is unequivocally due to human activities (IPCC 2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to

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<sup>1</sup> The Intergovernmental Panel on Climate Change’s (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the Intergovernmental Panel on Climate Change’s (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.

warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatons of anthropogenic CO<sub>2</sub> was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius between the years 2010 through 2019 (IPCC 2021). Furthermore, since the late 1700s, estimated concentrations of CO<sub>2</sub>, methane, and nitrous oxide in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity (USEPA 2021a). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 33 degrees Celsius (°C) cooler (World Meteorological Organization 2020). However, since 1750, estimated concentrations of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O in the atmosphere have increased by 47 percent, 156 percent, and 23 percent, respectively, primarily due to human activity (IPCC 2021). GHG emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

## **b. Greenhouse Gas Emissions Inventory**

### **Global Emissions Inventory**

In 2015, worldwide anthropogenic GHG emissions totaled 47,000 million metric tons (MT) of CO<sub>2</sub>e, which is a 43 percent increase from 1990 GHG levels (USEPA 2021b). Specifically, 34,522 million metric tons (MMT) of CO<sub>2</sub>e of CO<sub>2</sub>, 8,241 MMT of CO<sub>2</sub>e of CH<sub>4</sub>, 2,997 MMT of CO<sub>2</sub>e of N<sub>2</sub>O, and 1,001 MMT of CO<sub>2</sub>e of fluorinated gases were emitted in 2015. The largest source of GHG emissions were energy production and use (includes fuels used by vehicles and buildings), which accounted for 75 percent of the global GHG emissions. Agriculture uses and industrial processes contributed 12 percent and six percent, respectively. Waste sources contributed for three percent and two percent was due to international transportation sources. These sources account for approximately 98 percent because there was a net sink of two percent from land-use change and forestry. (USEPA 2021b).

### **United States Emissions Inventory**

Total U.S. GHG emissions were 6,558 MMT of CO<sub>2</sub>e in 2019. Emissions decreased by 1.7 percent from 2018 to 2019; since 1990, total U.S. emissions have increased by an average annual rate of 0.06 percent for a total increase of 1.8 percent between 1990 and 2019. The decrease from 2018 to 2019 reflects the combined influences of several long-term trends, including population changes, economic growth, energy market shifts, technological changes such as improvements in energy efficiency, and decrease carbon intensity of energy fuel choices. In 2019, the industrial and transportation end-use sectors accounted for 30 percent and 29 percent, respectively, of nationwide GHG emissions while the commercial and residential end-use sectors accounted for 16 percent and 15 percent of nationwide GHG emissions, respectively, with electricity emissions distributed among the various sectors (USEPA 2021c).

## California Emissions Inventory

Based on the California Air Resources Board (CARB) California Greenhouse Gas Inventory for 2000-2019, California produced 418.2 MMT of CO<sub>2</sub>e in 2019, which is 7.2 MMT of CO<sub>2</sub>e lower than 2018 levels. The major source of GHG emissions in California is the transportation sector, which comprises 40 percent of the state's total GHG emissions. The industrial sector is the second largest source, comprising 21 percent of the state's GHG emissions, while electric power accounts for approximately 14 percent (CARB 2021a). The magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, its relatively mild climate is a factor that reduces California's per capita fuel use and GHG emissions as compared to other states. In 2016, the State of California achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 MMT of CO<sub>2</sub>e (CARB 2021a). The annual 2030 statewide target emissions level is 260 MMT of CO<sub>2</sub>e (CARB 2017).

## Local Emissions Inventory

Based on the City of Ukiah's Draft 2014 Climate Action Plan, the City generated around 144,625 MT of CO<sub>2</sub>e in 2010 (City of Ukiah 2014). On-road transportation was the major source accounting for 51.1 percent of the total, largely due to passenger vehicles, but also commercial trips and buses. The City landfill was the second biggest source of emissions at 21.1 percent. Residential natural gas usage and commercial natural gas usage represented 10 percent and 6.4 percent respectively, while residential electricity usage and commercial electricity usage represented 1.2 percent and 2.2 percent. Solid waste accounted for 1.8 percent of the total emissions. Agricultural equipment accounted for 2.9 percent. Off-road transportation accounted for 3 percent. The remaining 0.3 percent is primarily from wastewater treatment. Water conveyance and stationary sources represent about 0.1 percent of the total emissions (City of Ukiah 2014).

### c. Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21<sup>st</sup> century than were observed during the 20<sup>th</sup> century. Each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature from 2015 to 2017 was approximately 1.0°C higher than the average global mean surface temperature over the period from 1880 to 1900 (National Oceanic and Atmospheric Administration 2020). Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature obtained from station observations jointly indicate that Land-Surface Air Temperature and sea surface temperatures have increased.

According to *California's Fourth Climate Change Assessment*, statewide temperatures from 1986 to 2016 were approximately 0.6 to 1.1°C higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include reduced water supply from snowpack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years (State of California 2018). In addition to statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state and regionally specific climate change case studies (State of California 2018). However, while there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what



local impacts may occur with a similar degree of accuracy. A summary follows of some of the potential effects that could be experienced in California as a result of climate change.

## **Air Quality**

Scientists project that the annual average maximum daily temperatures in California could rise by 2.4 to 3.2°C in the next 50 years and by 3.1 to 4.9°C in the next century (State of California 2018). Higher temperatures are conducive to air pollution formation, and rising temperatures could therefore result in worsened air quality in California. As a result, climate change may increase the concentration of ground-level ozone. The magnitude of the effect of the increased concentration of ground-level ozone, and therefore its indirect effects, are uncertain. In addition, as temperatures have increased in recent years, the area burned by wildfires throughout the state has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains (State of California 2018). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality could worsen. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains could tend to temporarily clear the air of particulate pollution, which would effectively reduce the number of large wildfires and thereby ameliorate the pollution associated with them (California Natural Resources Agency 2009).

## **Water Supply**

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. Year-to-year variability in statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more common (California Department of Water Resources 2018). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The average early spring snowpack in the western U.S., including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meter along the central and southern California coasts (State of California 2018). The Sierra snowpack provides most of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the fraction of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack (State of California 2018). Projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (State of California 2018).

## **Hydrology and Sea Level Rise**

Climate change could affect the intensity and frequency of storms and flooding (State of California 2018). Furthermore, climate change could induce substantial sea level rise in the coming century. Rising sea level increases the likelihood of and risk from flooding. The rate of increase of global mean sea levels between 1993 to 2022, observed by satellites, is approximately 3.5 millimeters per year, double the twentieth century trend of 1.6 millimeters per year (World Meteorological

Organization 2013; National Aeronautics and Space Administration 2022). Sea levels are rising faster now than in the previous two millennia, and the rise will probably accelerate, even with robust GHG emission control measures. While the City is no close to the Pacific coast, sea level rise may jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure (State of California 2018).

## **Agriculture**

California has an over \$50 billion annual agricultural industry that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts (California Department of Food and Agriculture 2020). Higher CO<sub>2</sub> levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (State of California 2018). Temperature increases could also change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

## **Ecosystems**

Climate change and the potential resultant changes in weather patterns could have ecological effects on the global and local scales. Soil moisture is likely to decline in many regions because of higher temperatures, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: timing of ecological events; geographic distribution and range of species; species composition and the incidence of nonnative species within communities; and ecosystem processes, such as carbon cycling and storage (Parmesan 2006; State of California 2018).

### **d. Local Effects of Climate Change**

While the above discussion identifies the possible effects of climate change at a global and potentially statewide level, regional and local predictions are often based on downscaling statewide models. Observable effects of climate change have already been witnessed on the environment. The City of Ukiah has specific vulnerabilities due to the changing climate that create the need for local adaptation measures (City of Ukiah 2014). In particular, the main concerns include the following:

- **Reduced snowpack.** In the eastern, higher-elevation portion of the North Coast region, March snow levels will drop to almost zero by the 2090s, a decrease of two to ten inches from 2010 levels. In areas with currently little snow (less than three inches), such as Ukiah, the snowpack is projected to be near zero by 2050.
- **Increased wildfires.** The North Coast region is projected to experience substantial increase in fire risk. By 2050, the region will experience modest increases in area burned. By 2100, the projected wildfire frequency increases dramatically, eight times greater in parts of Mendocino County. Northern Mendocino County is projected to have up to 2.5 times greater wildfire frequency.
- **Temperature increases.** January temperatures are predicted to increase by about 2 degrees Fahrenheit by 2050 and up to 5 degrees Fahrenheit by the year 2100 within the North Coast region. July increases in average temperatures are anticipated to be 3 degrees Fahrenheit and 6 degrees Fahrenheit by the year 2100.

- **Reduced precipitation.** The North Coast region is expected to experience a subtle decrease in precipitation in most areas throughout the century. The City of Ukiah is projected to see a decrease of around three to 4 inches by 2050, and 6 inches of precipitation by 2100. Reduced precipitation will adversely impact the water supply of the City, region, and State.
- **Public health and heat.** Ukiah is not projected to see a large increase in the number of heat waves, defined regionally as five consecutive days with temperatures as high as 93°F. Little change is expected by 2050 with possibly one to three more heat waves projected in region. By 2100, projected heat waves are more variable, with predictions of between two and eight more heat waves per year. However, when heat waves do occur, vulnerable populations in Ukiah may be severely affected because of a historic lack of adaptive capacity having to do with historically milder temperatures. Frequent heat waves can have the greatest impact on the elderly and children less than five years of age. Mendocino County is one of the state's counties with the highest proportion of elderly living alone.

## 4.6.2 Regulatory Setting

### a. Federal Regulations

#### Federal Clean Air Act

The U.S. Supreme Court determined in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) that the USEPA has the authority to regulate motor vehicle GHG emissions under the federal Clean Air Act. The USEPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, the USEPA issued a Final Rule that established the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities.

In *Utility Air Regulatory Group v. Environmental Protection Agency* (134 Supreme Court 2427 [2014]), the U.S. Supreme Court held the USEPA may not treat GHGs as an air pollutant for purposes of determining whether a source can be considered a major source required to obtain a Prevention of Significant Deterioration or Title V permit. The Court also held that Prevention of Significant Deterioration permits otherwise required based on emissions of other pollutants may continue to require limitations on GHG emissions based on the application of Best Available Control Technology.

#### Safer Affordable Fuel-Efficient Vehicles Rule

On September 27, 2019, the USEPA and the National Highway Traffic Safety Administration published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program. The SAFE Rule Part One revokes California's authority to set its own GHG emissions standards and to adopt its own zero-emission vehicle mandates. On April 30, 2020, the USEPA and the National Highway Traffic Safety Administration published Part Two of the SAFE Vehicles Rule, which revised corporate average fuel economy and CO<sub>2</sub> emissions standards for passenger cars and trucks of model years 2021-2026 such that the standards increase by approximately 1.5 percent each year through model year 2026, as compared to the approximately 5 percent annual increase required under the 2012 standards (National Highway Traffic Safety Administration 2022). To account for the

effects of the SAFE Vehicles Rule, CARB released off-model adjustment factors on June 26, 2020, to adjust GHG emissions outputs from the EMFAC model (CARB 2020).

## **b. State Regulations**

CARB is responsible for the coordination and oversight of State and local air pollution control programs in California. There are numerous regulations aimed at reducing the state's GHG emissions. These initiatives are summarized below.

### **California Advanced Clean Cars Program**

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, the USEPA granted the waiver of Clean Air Act preemption to California for its GHG emission standards for motor vehicles, beginning with the 2009 model year, which allows California to implement more stringent vehicle emission standards than those promulgated by the USEPA. Pavley I regulates model years from 2009 to 2016 and Pavley II, now referred to as "LEV (Low Emission Vehicle) III GHG," regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the LEV, Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, the rules will be fully implemented, and new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011).

### **California Global Warming Solutions Act of 2006 (Assembly Bill 32 and Senate Bill 32)**

The "California Global Warming Solutions Act of 2006," (AB 32), outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT of CO<sub>2</sub>e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others (CARB 2008). Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since the Scoping Plan's approval.

The CARB approved the 2013 Scoping Plan update in May 2014. The update defined the CARB's climate change priorities for the next five years, set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the state's longer term GHG reduction strategies with other state policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the

2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100 (discussed below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of 6 MT of CO<sub>2</sub>e by 2030 and 2 MT of CO<sub>2</sub>e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the state (CARB 2017).

### **Senate Bill 375**

The Sustainable Communities and Climate Protection Act of 2008 (SB 375), signed in August 2008, enhances the state's ability to reach AB 32 goals by directing the CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations. Metropolitan Planning Organizations (MPOs) are required to adopt a Sustainable Communities Strategy (SCS), which allocates land uses in the MPO's Regional Transportation Plan (RTP). Qualified projects consistent with an approved SCS or Alternative Planning Strategy (categorized as "transit priority projects") can receive incentives to streamline CEQA processing.

The City of Ukiah is within the Mendocino Council of Governments (MCOG), which is a non-MPO Rural Regional Transportation Planning Area (RTPA). Non-MPO Rural RTPAs are not required to prepare CARB-certified SCS. MCOG's most recent RTP was adopted in February 2018 and includes policies that support achieving targets established by SB 375, which are discussed under *Regional and Local Regulations* (MCOG 2018).

### **California Integrated Waste Management Act (Assembly Bill 341)**

The California Integrated Waste Management Act of 1989, as modified by AB 341 in 2011, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities and (2) diversion of 50 percent of all solid waste on and after January 1, 2000.

### **Senate Bill 1383**

Adopted in September 2016, SB 1383 (Lara, Chapter 395, Statutes of 2016) requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. SB 1383 requires the strategy to achieve the following reduction targets by 2030:

- Methane – 40 percent below 2013 levels
- Hydrofluorocarbons – 40 percent below 2013 levels
- Anthropogenic black carbon – 50 percent below 2013 levels

SB 1383 also requires the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with the CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

## **Senate Bill 100**

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the state's Renewables Portfolio Standard (RPS) Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. The 2020 goal was met, with approximately 36 percent of electricity coming from renewable sources in March 2021 (CARB 2021b).

## **Executive Order B-55-18**

On September 10, 2018, the former Governor Brown issued Executive Order (EO) B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

## **California Building Standards Code**

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2019 Title 24 standards. The California Building Standards Code's energy-efficiency and green building standards are outlined below.

### *Part 6 – Building Energy Efficiency Standards/Energy Code*

CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC). The 2019 Title 24 standards are the applicable building energy efficiency standards for the project because they became effective on January 1, 2020 (2018).

### *Part 11 – California Green Building Standards*

The California Green Building Standards Code, referred to as CalGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). Current CalGreen includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers (Tiers I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CalGreen standards and may adopt additional amendments for stricter requirements.

The mandatory standards require:

- 20 percent reduction in indoor water use relative to specified baseline levels;<sup>2</sup>
- 65 percent construction/demolition waste diverted from landfills;
- Inspections of energy systems to ensure optimal working efficiency;
- Low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards;
- Dedicated circuitry to facilitate installation of electric vehicle charging stations in newly constructed attached garages for single-family and duplex dwellings; and
- Installation of electric vehicle charging stations at least three percent of the parking spaces for all new multi-family developments with 17 or more units.

The voluntary standards require:

- Tier I: stricter energy efficiency requirements, stricter water conservation requirements for specific fixtures, 65 percent reduction in construction waste with third-party verification, 10 percent recycled content for building materials, 20 percent permeable paving, 20 percent cement reduction, and cool/solar reflective roof; and
- Tier II: stricter energy efficiency requirements, stricter water conservation requirements for specific fixtures, 75 percent reduction in construction waste with third-party verification, 15 percent recycled content for building materials, 30 percent permeable paving, 25 percent cement reduction, and cool/solar reflective roof.

## **c. Regional and Local Regulations**

### **Mendocino County Air Quality Management District**

The Mendocino County Air Quality Management District (MCAQMD) is responsible for assuring that the federal and state ambient air quality standards are attained and maintained in the southern North Coast Air Basin. MCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities.

### **Mendocino Council of Governments**

The 2017 Mendocino RTP is a long-range planning effort, undertaken by MCOG, that involves federal, State, regional, local and tribal governments; public and private organizations; and individuals working together to plan how future regional transportation needs can be met. The RTP Guidelines require that the issue of climate change and greenhouse gas emissions be addressed during the RTP process. While predominately rural areas such as Mendocino County are not subject to the same requirements as urban regions, discussion of the issue in the RTP provides the opportunity to identify existing and future efforts that will contribute to the emission reduction targets. Strategies to reduce GHG generation entail expanded transit use, improving streets/roads

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<sup>2</sup> Similar to the compliance reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CalGreen water-reduction requirements must be demonstrated through completion of water use reporting forms. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CalGreen or a reduced per-plumbing-fixture water use rate.

efficiency, and expanding non-motorized travel opportunities. These strategies have been and will continue to be employed in Mendocino County throughout the time frame of the 2017 RTP, which is 2017 to 2030. The RTP includes the objective to “invest in transportation projects and participate in regional planning efforts that will help Mendocino County residents to proportionately contribute to the California greenhouse gas reduction targets established by Assembly Bill 32 and SB 375” (MCOG 2018). Policies to support that objective include the following:

- Evaluate transportation projects based on their ability to reduce Mendocino County’s transportation-related greenhouse gas emissions.
- Prioritize transportation projects which lead to reduced greenhouse gas emissions.
- Monitor new technologies and opportunities to implement energy efficient and nonpolluting transportation infrastructure.
- Continue to consider bicycle transportation, pedestrian, and transit projects for funding in the State Transportation Improvement program.
- Continue administrative, planning, and funding support for the Region’s transit agency, Mendocino Transit Authority.
- Encourage private and public investment in a countywide electric vehicle charging station network and seek funding to fill gaps in the network.

### **City of Ukiah Climate Action Plan**

The City of Ukiah Draft 2014 Climate Action Plan (CAP) outlines strategies, goals, and actions for reducing municipal and community-wide GHG emissions. The Draft CAP was completed in 2014 but never adopted by the City. The CAP is designed to ensure that Ukiah does its part to contribute to the goals of AB 32, while remaining consistent with the Ukiah General Plan vision for future growth. The CAP includes emissions reduction goals, strategies, and actions for 2020 and considers the years beyond 2020 as deeper reductions in GHG emissions are necessary. The measures in the CAP address energy consumption and generation, transportation and land use, solid waste disposal, and water use.

## **4.6.3 Impact Analysis**

### **Significance Thresholds**

Based on Appendix G of the *CEQA Guidelines*, impacts related to GHG emissions from the proposed project would be significant if the project would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Most individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence on climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project’s contribution towards an impact is cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future



projects (*CEQA Guidelines*, Section 15064[h][1]). MCAQMD defers to Bay Area Air Quality Management District (BAAQMD) guidelines for projects in Mendocino County (MCAQMD 2013). The 2022 BAAQMD *CEQA Air Quality Guidelines* provides two plan level thresholds for determining the significance of GHGs. The two approaches are as follows:

1. Consistency with a qualified GHG reduction plan
2. Meets the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045

The City of Ukiah's CAP is not a qualified GHG reduction plan, since it contains targets only for 2020 and was never adopted by the City; therefore, the first approach is not feasible. As such, the City uses the second approach to determine the significance of GHGs for development facilitated by Ukiah 2040.

## Methodology

The focus of this analysis of GHG emissions are limited to only those potential emissions that would result from net buildout of the project. While emissions generated in the City and the region, such as those emissions generated by businesses or individual operations, may contribute to GHG emissions globally, only those emissions that may change compared to existing conditions under project implementation are included in this EIR. Emissions not directly resulting from development facilitated by the project are considered outside the scope of this CEQA analysis because it would be speculative to analyze impacts not directly related to the project.

Based on plan-level guidance from the 2022 BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, GHG emissions associated with project implementation is discussed qualitatively by comparing Ukiah 2040 to the 2022 BAAQMD GHG thresholds, namely whether policies work towards carbon neutrality by 2045. In addition, the plans are qualitatively compared to other applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs.

<b>Threshold 1:</b>	Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
<b>Threshold 2:</b>	Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

**Impact GHG-1 DEVELOPMENT FACILITATED BY UKIAH 2040 WOULD MAKE PROGRESS TOWARDS ACHIEVING STATE GOALS BUT WOULD NOT NECESSARILY MEET STATE 2030 OR 2045 GOALS. MITIGATION MEASURES GHG-1 AND GHG-2 WOULD RESULT IN IMPLEMENTATION OF CEQA GHG THRESHOLDS AND A CAP UPDATE; HOWEVER, DEVELOPMENT FACILITATED BY UKIAH 2040 WOULD NOT MEET THE 2030 OR 2045 GOALS UNTIL THE CAP IS UPDATED AND ADOPTED. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.**

## Construction Emissions

Development facilitated by Ukiah 2040 would result in GHG emissions during construction, primarily from fuel consumption associated with heavy equipment, light-duty vehicles, machinery, and generators for lighting. Temporary grid power may also be provided to construction trailers or electric construction equipment that may result in indirect GHG emissions from the energy generation. Development facilitated by Ukiah 2040 would utilize construction contractors that would be required to comply with applicable CARB regulations such as accelerated retrofitting,

repowering, or replacement of heavy-duty diesel on-road and off-road equipment. Construction contractors are required to comply with the provisions of CCR Title 13, sections 2449 and 2485, and CARB regulations prohibiting diesel-fueled commercial and off-road vehicles from idling for more than five minutes, minimizing unnecessary GHG emissions. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would minimize inefficient fuel consumption and thus GHG emissions. These construction equipment standards (i.e., Tier 4 efficiency requirements) are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068. Pursuant to applicable regulatory requirements of CALGreen, development facilitated by the 2040 General Plan would comply with construction waste management practices to divert construction and demolition debris from landfills. These practices would result in efficient use of energy by construction facilitated by the project and therefore would minimize unnecessary GHG emissions. Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary, which would also have the effect of minimizing GHG emissions.

Pursuant to the 2022 BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, BAAQMD does not recommend a construction-related climate impact threshold. According to BAAQMD, GHG emissions from construction represent a very small portion of a project's lifetime GHG emissions. The proposed thresholds for land use projects are designed to address operational GHG emissions that represent the vast majority of project GHG emissions. Therefore, the evaluation of GHG emissions impacts associated with project implementation is focused on operational emissions, discussed below.

Nonetheless, the Ukiah 2040 Environment and Sustainability Element includes policies to reduce the impact of GHG emissions generated with construction activities. The relevant policies include the following:

**Policy ENV-7.3:** Implement Clean Air Plan. The City shall cooperate with Mendocino County Air Quality Management District (MCAQMD) to implement the Clean Air Plan required by the Clean Air Act, reduce non-attainment pollutants, including PM<sub>10</sub>, PM<sub>2.5</sub>, and ozone, and enforce air quality standards as required by State and Federal statutes.

**Policy ENV-7.5:** Construction and Operations. The City shall require that development projects incorporate feasible measures that reduce construction and operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).

Implementation of Policy ENV-7.3 does not directly address construction GHG emissions, but implementation of a Clean Air Plan and subsequent reduction of significant air quality impacts from construction would reduce construction GHG emissions. Policy ENV-7.5 would reduce construction GHG emissions since measures to reduce reactive organic gases, nitrogen oxides, and particulate matter would indirectly reduce construction GHG emissions. Measures to reduce air quality impacts from construction activities could include using equipment equipped with a cleaner engine, using alternative powered equipment (e.g., electric equipment), or reducing the hours equipment can operate on site. These factors would reduce both air quality and GHG construction emissions.

## **Operational Emissions**

Development facilitated by Ukiah 2040 would result in GHG emissions during operation. GHG emissions would result primarily from building energy usage and fuel consumption associated with light-duty vehicles. Ukiah 2040 contains policies that aim to reduce operational GHG emissions in accordance with State 2030 GHG emissions reductions goals and provide substantial progress to the

State's goal of carbon neutrality by 2045. Proposed Ukiah 2040 policies related to GHG emissions reductions include:

**Goal ENV-7:** To improve air quality to the benefit of public health, welfare, and reduce air quality impacts with adverse effects on residents' health and wellbeing.

**Policy ENV-7.1:** Transit Oriented Development. The City shall concentrate new development near areas served by transit access and reduce single-occupancy vehicle dependency.

**Policy ENV-7.2:** Active Transportation. The City shall prioritize pedestrian and bicycle access, infrastructure, and education to encourage increased use of alternative modes of transportation as a means to reduce direct and indirect air contaminant emissions.

**Policy ENV-7.5:** Construction and Operations. The City shall require that development projects incorporate feasible measures that reduce construction and operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).

**Policy ENV-7.6:** Wood Burning Fireplace Replacement. The City shall promote the replacement of non-EPA certified fireplaces and woodstoves and encourage city residents to participate in MCAQMD and NSCAPCD programs, such as the Wood Stove Rebate Program.

**Policy ENV-7.7:** City Vehicle and Equipment Fleet. The City shall continue to purchase low-emission vehicles and use clean alternative fuels as part of their fleet. When possible, the City will replace gas and hybrid vehicles with electric vehicles.

**Policy ENV-7.8:** Residential EV Charging Stations. The City shall encourage new development to install EV charging stations in homes to increase the potential for the public to use zero-emission vehicles, lessening the impacts to air quality through pollution.

**Policy ENV-7.9:** Public EV Charging Stations. The City shall install public charging stations in its commercial areas to provide additional charging options for city visitors.

**Goal ENV-8:** To achieve carbon neutrality by or before the year 2045.

**Policy ENV-8.1:** Carbon Neutrality Resolution. The City shall adopt a Carbon Neutrality Resolution that provides a foundation for all subsequent climate actions.

**Policy ENV-8.2:** Micro-grid and Small Battery Storage. The City shall encourage the development of small-scale battery storage and micro grid capacity for storing renewable power for nighttime energy use.

**Policy ENV-8.3:** Municipal Building Electrification Plan. The City shall adopt an electrification plan for all municipal buildings to convert them to all electric using energy from carbon-free and renewable sources by 2035.

**Policy ENV-8.4:** Municipal Preference of Emissions-Reduced Equipment. The City shall contract only with providers who use electric-powered equipment where available and feasible for City construction projects or contract services.

**Policy ENV-8.5:** Energy Conservation and Renewable Energy. The City shall promote energy conservation in municipal facilities by seeking opportunities to install energy efficient fixtures and appliances, solar panels, solar battery storage, and other retrofits to new and existing structures.

**Goal LU-1:** To provide a variety of housing types that offer choices for Ukiah residents and create complete, livable neighborhoods.

**Policy LU-1.2:** Connectivity. The City shall encourage new residential development to incorporate design features that promote walking and connectivity between blocks.

**Policy LU-1.4:** High-Density Residential Uses. The City shall encourage new high-density residential development to locate in areas close to services and transit.

**Goal LU-2:** To encourage mixed-use development projects that create vibrant, walkable districts.

**Policy LU-2.1:** Downtown Mixed-Use. The City shall encourage mixed-use development to locate within the Downtown. Such developments include housing, retail commercial, offices, open space, and other compatible uses. This development pattern should create vibrant, walkable areas, in contrast to strip retail developments along corridors.

**Policy LU-2.3:** Mixed-Use Design. The City shall require new mixed-use development to limit the number of access driveways, minimize building setbacks, and provide public ground floor spaces adjacent to sidewalks.

**Policy LU-2.4:** Pedestrian Orientation. The City shall require new mixed-use and commercial developments with street or bike route frontage to include amenities that connect and create a comfortable environment for walking, sitting, and socializing.

**Policy LU-2.5:** Live/Work. The City shall encourage mixed-uses in appropriate non-residential or existing mixed-use areas, facilitate the adaptive reuse of otherwise obsolete structures, and promote the growth of the arts and small business ventures in the community by allowing combined workspace and living quarters in appropriate buildings in commercial or industrial zoning districts.

**Goal LU-4:** To encourage the growth and development of retail, office, service, and entertainment uses in Ukiah to provide jobs, support City services, and make Ukiah an attractive place to live.

**Policy LU-4.5:** Pedestrian Access to Commercial Uses. The City shall support convenient and direct pedestrian access to commercial uses that are located adjacent to residential areas.

**Goal MOB-1:** To provide a citywide network of complete streets that meet the needs of all users, including pedestrians, bicyclists, motorists, transit, movers of commercial goods, children, seniors, and persons with disabilities.

**Policy MOB-1.1:** Complete Streets. The City shall design streets holistically, using a complete streets approach, which considers pedestrians, bicyclists, motorists, transit users, and other modes together to adequately serve future land uses.

**Policy MOB-1.2:** Multi-modal Access. The City shall require that all new development and redevelopment projects include provisions for multi-modal access provisions such as pedestrian and bicycle facilities, and vehicle and transit where relevant.

**Policy MOB-1.3:** Reallocate Space for Complete Streets. The City shall reallocate roadway space to allow complete streets improvements on streets with excess traffic capacity.

**Policy MOB-1.4:** Block Length. The City shall limit block lengths to 600 feet wherever feasible to enhance multi-modal circulation and connectivity.

**Policy MOB-1.8:** New Development and Complete Streets. The City shall require all new development to provide adequate access for pedestrians, bicyclists, motorists, transit users, and persons with disabilities, as well as facilities necessary to support the City's goal of maintaining a complete street network.

**Policy MOB-1.9:** Bikeway Network. The City shall strive to complete the citywide bicycle network to create a full network of bicycle facilities throughout Ukiah, including bicycle lanes on all arterial and collector street segments where feasible.

**Policy MOB-1.10:** Bicycle Parking Standards. The City shall maintain efficient and updated parking standards for bicycle parking to ensure development provides adequate bicycle parking, while reducing reliance on automobiles.

**Policy MOB-1.11:** Pedestrian Barriers & Utility Relocation. The City shall support elimination of barriers to pedestrian travel on sidewalks and walking paths including requiring the relocation or undergrounding of utilities where appropriate.

**Goal MOB-2:** To reduce vehicle miles traveled (VMT) to and from residences, jobs and commercial uses in Ukiah.

**Policy MOB-2.1:** Vehicle Miles Traveled (VMT) Reduction. The City shall support development and transportation improvements that help reduce VMT below regional averages on a "residential per capita" and "per employee" basis.

**Policy MOB-2.2:** Transportation Demand Management. The City shall support programs to reduce vehicle trips, including measures such as reduced parking requirements that aim to increase transit use, car-pooling, bicycling and walking.

**Policy MOB-2.3:** Pedestrian Facilities. The City shall encourage new development and redevelopment that increases connectivity through direct and safe pedestrian connections to public amenities, neighborhoods, shopping and employment destinations throughout the City.

**Policy MOB-2.4:** Transit Facility Design. The City shall require new development to include facilities designed to make public transportation convenient.

**Policy MOB-2.5:** Transit Ridership. The City shall support funding and incentives to increase transit ridership opportunities.

**Policy MOB-2.6:** Downtown Transit Center. The City shall support creation of a Transit Center.

**Policy MOB-2.7:** Bicycle Accessible Transit. The City shall encourage the MTA and other public transportation providers to make bus routes connecting Ukiah with other areas bicycle accessible.

**Goal MOB-5:** To promote a balance of multi-modal options, to be reflected in flexible parking regulations.

**Policy MOB-5.1:** Incentives for Travel Alternatives. The City shall work with downtown businesses and employers reduce the need for and expenses of off-street parking by supporting and encouraging alternatives to single-occupant vehicles such as incentives and priority parking for carpools and vanpools, secure bicycle parking, and free bus passes.

**Policy MOB-5.2:** Support for Charging Stations. The City shall support the provision of charging stations for electric vehicles, as well as other types of vehicles, as new technologies emerge.

Ukiah 2040 proposed goals and policies would assist in reducing emissions to 40 percent below 1990 levels by 2030 and reaching carbon neutrality by 2045, but as explained further below would not necessarily achieve either goal. Goal ENV-7 and associated policies would reduce air quality pollutants, which would also reduce GHG emissions through encouragement of transit use and active transportation, measures to reduce construction and operational emissions, replacement of wood burning fireplaces, and electric vehicle uses. Goal ENV-8 and associated policies directly aims to achieve carbon neutrality by 2045. Specifically, Policy ENV-8.1 calls for the adoption of a Carbon Neutrality Resolution to guide future CAPs. Policies ENV-8.2 through ENV-8.5 encourage use of electric-powered equipment, energy conservation, and renewable energy use, which would reduce GHG emissions associated with non-renewable energy sources. Goals LU-1 and LU-2 and associated policies call for land use to be designed to accommodate pedestrian use, which would reduce reliance on personal vehicles and subsequent GHG emissions. Goals MOB-1, MOB-2, and MOB-5, along with associated policies aim to increase transit ridership and active transportation use, while reducing vehicle miles traveled, which would reduce GHG emissions associated with personal vehicles.

Ukiah 2040 is a policy-level document that guides land use and development throughout the City. The CARB 2017 Climate Change Scoping Plan outlines a pathway to achieving the 2030 reduction targets set under SB 32, which are considered interim targets toward meeting the long-term 2045 carbon neutrality goal established by California Executive Order B-55-18. While Ukiah 2040 would facilitate additional development within the City, building energy consumption and VMT (and thus GHG emissions), water consumption, and solid waste generation per capita would be reduced under the project's buildout compared to existing conditions, given the above discussed policies. However, Ukiah 2040 does not outline how the City would meet the goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045. Ukiah 2040 would therefore not be consistent with the California Executive Order B-55-18 goal of carbon neutrality by 2045, nor does it have a qualified GHG reduction plan to guide progress towards State goals. Therefore, impacts related to generation of GHG emissions and consistency with State GHG reduction plans due to Ukiah 2040 would be potentially significant.

Implementation of Mitigation Measures GHG-1 and GHG-2 would require that the City implement CEQA GHG emissions thresholds and update the Ukiah CAP to establish a Citywide GHG reduction target and provide an outline of how Ukiah will meet the State goal of carbon neutrality by 2045.

## **Mitigation Measures**

### *GHG-1     Adopt and Implement a CEQA GHG Emissions Threshold*

The City shall include and implement a new 2040 General Plan policy under the Environment and Sustainability Element to prepare, adopt, and implement a CEQA GHG Emissions threshold of significance. The City shall adopt the CEQA GHG Emissions threshold of significance by Fall 2024 for use in future CEQA GHG emissions analyses through 2030. In addition, upon completion of future CAP updates and as necessary, the City shall update the CEQA GHG Emissions threshold of significance and Ukiah CEQA GHG Checklist to be consistent with each CAP update.

### *GHG-2     Update Ukiah CAP to the State's 2030 and 2045 GHG Emissions Goals*

The City shall update the Ukiah CAP by Fall 2024 to outline how Ukiah will meet the State's 2030 goal of 40 percent below 1990 emissions levels and 2045 goal of carbon neutrality. Implementation

measures in the updated CAP to achieve the 2030 and 2045 goals may include, but are not limited to, the following:

- Develop and adopt Zero Net Energy requirements for new and remodeled residential and non-residential development;
- Develop and adopt a building electrification ordinance for existing and proposed structures;
- Expand charging infrastructure and parking for electric vehicles;
- Implement carbon sequestration by expanding the urban forest, participating in soil-based or compost application sequestration initiatives, supporting regional open space protection, and/or incentivizing rooftop gardens; and
- Implement policies and measures included in the California 2017 Climate Change Scoping Plan, such as mobile source strategies for increasing clean transit options and zero emissions vehicles by providing electric vehicle charging stations.

### **Significance After Mitigation**

Implementation of Mitigation Measures GHG-1 and GHG-2 would ensure that development facilitated by Ukiah 2040 after Fall 2024 would be consistent with State emissions goals. However, individual projects that may occur prior to Fall 2024 would not be guaranteed to be consistent with State emissions goals, nor are exact emissions reductions known at the time of adoption of the 2040 General Plan. Until the CEQA GHG thresholds are adopted and the CAP is updated, implementation of Ukiah 2040 would not be consistent with BAAQMD GHG thresholds nor would it be consistent with State GHG reduction plans. Therefore, the project's impacts related to GHG emissions would be significant and unavoidable.

## 4.7 Land Use and Planning

This section summarizes the City's land use characteristics, including the overall land use pattern and major land use type, and analyzes the impacts related to land use and planning due to the project.

### 4.7.1 Setting

Existing land use and Ukiah 2040 land uses are described with the following terms:

- **City Limits.** The political boundary that defines land that has been incorporated into a city. Ukiah has land use authority over all land within its city limits.
- **Sphere of Influence.** The Local Agency Formation Commission (LAFCO) establishes the Sphere of Influence (SOI), which defines the probable physical boundary and service area of a local agency. An SOI typically includes both incorporated and unincorporated areas within which the City will have primary responsibility for the provision of public facilities and services.
- **Planning Area.** A general plan, pursuant to State law, must address all areas within the jurisdiction's Planning Area. The Planning Area encompasses all incorporated and unincorporated territory that bears a physical relationship to the long-term planning of the city. For Ukiah, the Planning Area is defined as the area that includes both the city limits and SOI, as well as the existing Ukiah Valley Area Plan boundary.

#### a. Existing Setting

The City of Ukiah encompasses 3,071 acres, approximately one third of which is comprised of residential development. As described in Section 2, *Project Description*, the City's existing land use pattern is shaped by the surrounding topography and circulation patterns. The adopted 1995 General Plan assigns a particular use to each parcel in the City and establishes development policies for each land use category. The 1995 General Plan includes nine land use designations, described below in Table 4.7-1. Existing land use designations in the City of Ukiah are shown in Figure 4.7-1.

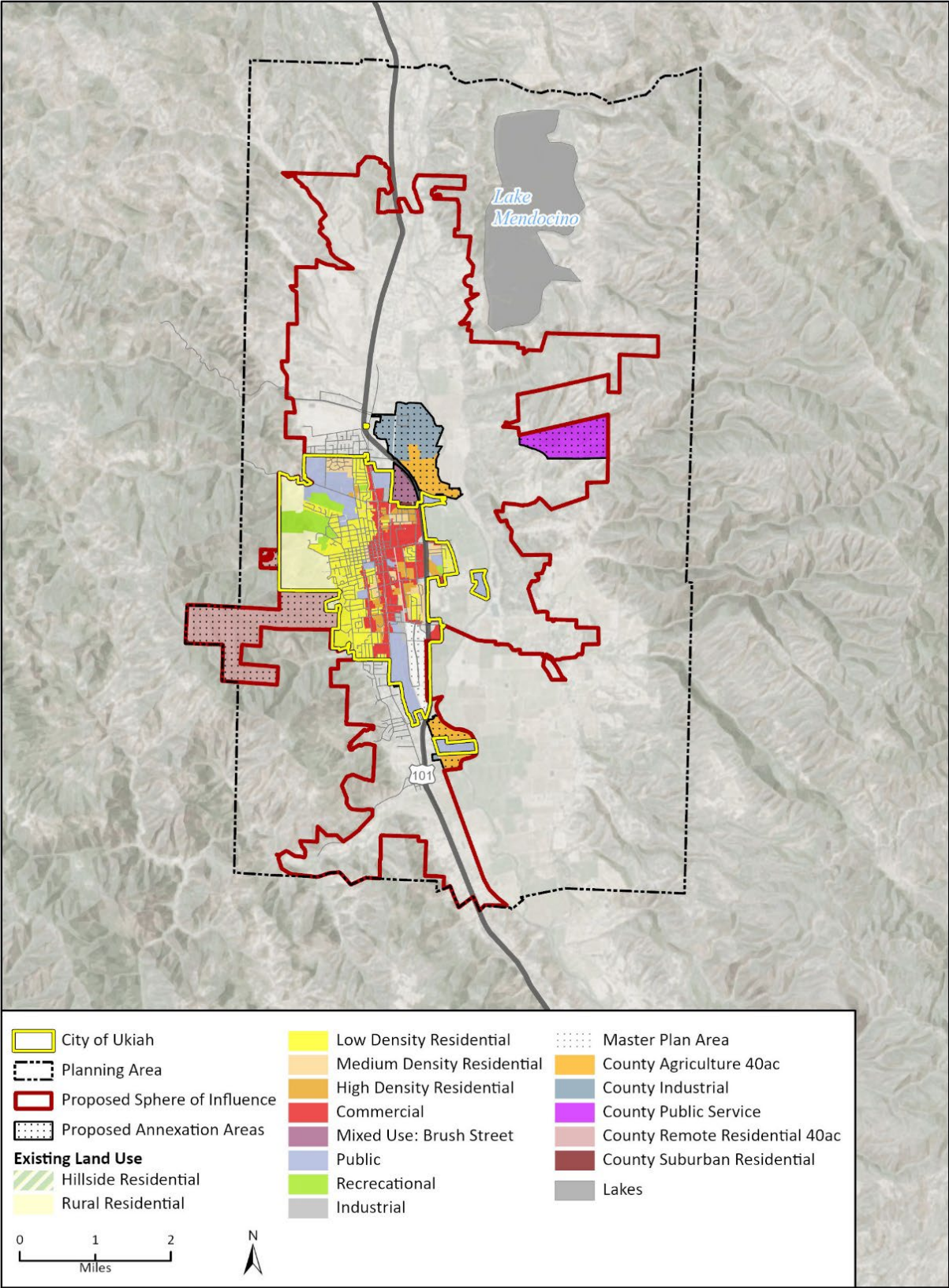
**Table 4.7-1 Existing (1995) General Plan Land Use Designations**

Designation	Land Use
Rural Residential	Residential uses up to one dwelling unit per acre.
Low Density Residential	Residential uses up to six dwelling units per acre.
Medium Density Residential	Residential uses up to 14 dwelling units per acre.
High Density Residential	Residential uses up to 28 dwelling units per acre.
Commercial	Retail and service businesses, as well as residential uses up to 28 dwelling units per acre.
Industrial	Manufacturing and major employment uses.
Recreational	Parks and other recreational uses in the city.
Public	Public uses, including all land owned by public agencies, such as schools, public utility facilities, and civic centers.
Master Planned Area	The Master Plan Area land use classification is to be applied to the parcels contained within a Master Plan or a Specific Plan at the time of adoption by the City or County.

Source: City of Ukiah 2020



Figure 4.7-1 Existing Land Use Designations (1995 General Plan)



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Additional data provided by City of Ukiah, 2022.

## **b. Existing Zoning**

The City of Ukiah's Zoning Ordinance established pursuant to Ukiah City Code (UCC) Division 9, Chapter 2, consists of a set of zoning districts that specify uses that are permitted, conditionally permitted, or prohibited within each district. The City has fourteen zoning districts, organized as follows:

- R1, R2, and R3 are residential zones ranging from low density hillside single-family to higher density multifamily. The Hillside Overlay district (-H) is applied to R1 lands within the western hills. Combined, these residential zones account for more than 49 percent of the area within city limits and the majority of the west side.
- Industrial and commercial zones are Manufacturing (M), Community Commercial (C1), Heavy Commercial (C2), and Neighborhood Commercial (CN). Commercial zones are generally situated immediately west of U.S. Highway 101 and along North and South State Street, and account for approximately 15 percent of city.
- The Public Facilities zone (PF) includes City facilities, parks, and public land. PF is the largest zone in the city, containing approximately 24 percent of the city, including the Ukiah Municipal Airport.
- Planned Development (PD) zones exist within the city, one for residential and one for commercial. Planned Development zones are intended to encourage development by providing more flexibility than is possible through the strict application of the Zoning Code requirements and allowing flexibility of design and the application of new techniques in land development.

In 2012, the City adopted its Downtown Zoning Code which established three downtown-specific zoning districts. These districts are located along the East Perkins Street Corridor east of U.S. Interstate 101, and are categorized as follows:

- General Urban (GU) zone allows for mixed-use and urban residential uses in a wide range of building types, from single use and single-family to a mix of uses and multifamily. GU zone allows for residential densities between 10 and 28 dwelling units per acre (du/ac).
- Urban Center (UC) zone allows for higher-density residential and mixed-use buildings that may accommodate retail, office, services, local and regional civic uses, and residential uses. This zone has a tight network of streets with wide sidewalks, regularly spaced street tree planting, and buildings set close to lot frontages. The UC zones allows for residential densities between 15 and 28 du/ac.

Downtown Core (DC) zone allows the highest density and intensity of development by allowing a wide variety of commercial and residential uses located in mixed-use buildings. This zone has small, walkable blocks with regularly spaced street trees and buildings set at the frontage line. The DC zone allows for residential densities between 15 and 28 du/ac.

Table 4.7-2 below describes the distribution of existing zones in Ukiah.

**Table 4.7-2 Existing Zoning Districts**

Zone	Acres	Percent of City Area
Public Facilities - PF	638.3	24.2%
Single-Family Residential - R1	626	23.7%
Single Family Residential, Hillside - R1H	489.4	18.6%
Community Commercial - C1	203.5	7.7%
Heavy Commercial - C2	138.4	5.2%
Planned Development, Commercial - PDC	128.5	4.9%
High-Density Residential - R3	108.4	4.1%
Planned Development, Residential - PDR	91.5	3.5%
Medium-Density Residential - R2	75.1	2.8%
Neighborhood Commercial - CN	49.6	1.9%
Urban Core - UC	37.7	1.4%
Manufacturing - M	28.5	1.1%
General Urban - GU	14.7	0.6%
Downtown Core - DC	5.2	0.2%
Right-of-Way	2.4	0.1%
<b>Total</b>	<b>2,637.2</b>	<b>100.0%</b>

Source: City of Ukiah 2020

### c. Existing Plans

#### City of Ukiah Design Guidelines

Ukiah established design guidelines in two steps, starting in 1992, when the City adopted Design Guidelines for Commercial Structures within the Downtown District. This effort was followed by adoption of Design Guidelines for Commercial Structures Outside the Downtown District in 1996. These design guidelines provide recommendations on the form, rather than use, of structures in the City. The Downtown Design Guidelines generally encompasses the State Street frontage between Brush Street and Talmage Road, as well as Perkins and Gobbi street frontages between U.S. Highway 101 and the downtown area, and portions of School, Dora and Oak streets adjacent to City Hall. The Design Guidelines for Commercial Structures Outside the Downtown District encompasses the commercial areas outside the Downtown core.

#### City of Ukiah Design and Development Standards for Ministerial Residential Development

In 2021, the Ukiah City Council adopted Objective Design and Development Standards for New Residential Construction (Ordinance 1212) which have been codified in Ukiah City Code Section 9055. Specifically, Ukiah Municipal Code Section 9055.1 establishes objective development standards for new residential construction, including lighting, landscaping, orientation, and setback standards. Ukiah Municipal Code Section 9055.2 establishes objective design standards for new residential construction, including color palette, screening, roof design, and structural massing standards. The purpose of these standards is to create a by-right, ministerial approval process for all new residential construction, excluding single-family homes. To do so, this article sets forth objective design and development standards that remove barriers to and reduce costs for new

residential construction, excluding single-family homes, while still protecting the residential character of the City's neighborhoods.

### **Ukiah Municipal Airport Master Plan**

The Ukiah Municipal Airport Master Plan (Airport Master Plan), adopted by the City in 1996, serves as a framework within which individual airport projects can be implemented. The Airport Master Plan summarizes airport inventory, role and activity, and financial plan, and establish standards for airfield design and building area development. In January 2016, the Federal Aviation Administration (FAA) approved Ukiah Municipal Airport's Airport Layout Plan, illustrating proposed alterations to the airfield system.

### **Ukiah Municipal Airport Land Use Compatibility Plan**

Adopted in 2021 by the Mendocino County Airport Land Use Commission (ALUC) and City of Ukiah, the Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP) replaces the compatibility plan for Ukiah Municipal Airport adopted by the ALUC in 1996 as part of the countywide Mendocino County Airport Comprehensive Land Use Plan (MCACLUP). The UKIALUCP is wholly self-contained and does not rely upon any policies or other content contained in the MCALUCP. The MCALUCP remains in effect for other airports in Mendocino County.

The basic function of the UKIALUCP is to promote compatibility between the airport and surrounding land uses. As adopted by the ALUC, the plan serves as a tool for use by the Commission in fulfilling its duty to review certain airport and adjacent land use proposals. Additionally, the plan sets compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of new development.

### **Ukiah Valley Area Plan**

The Ukiah Valley Area Plan, adopted by Mendocino County in 2011, governs land use and planning of the unincorporated areas of the Ukiah Valley. Although the document does not cover the city of Ukiah, it does establish land use designations and development standards within the City of Ukiah Planning Area (City of Ukiah 2020). Section 3 of the Ukiah Valley Area Plan shows that land uses immediately within the Planning Area include Remote Residential (RMR40) west of City limits, Rural Residential and Commercial to the south, agricultural to the east, and Rural Residential, Commercial, and Industrial to the north (County of Mendocino 2011).

## **4.7.2 Regulatory Setting**

### **a. State Regulations**

#### **California Government Code**

California Government Code Section 65300 regulates the substantive and topical requirements of general plans. State law requires each city and county to adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning." The California Supreme Court has called the general plan the "constitution for future development." The general plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, both public and private.

California Government Code Section 65301 requires a general plan to address the geographic territory of the local jurisdiction and any other territory outside its boundaries that bears relation to

the planning of the jurisdiction. The jurisdiction may exercise their own judgment in determining what areas outside of its boundaries to include in the Planning Area. The State of California General Plan Guidelines state that the Planning Area for a city should include (at minimum) all land within the city limits and all land within the city's Sphere of Influence.

### **Cortese Knox Hertzberg Local Government Reorganization Act of 2000**

The Cortese Knox Hertzberg Local Government Reorganization Act (CKH Act) is the most significant reform to local government reorganization law since the 1963 statute that created a LAFCo in each county. The law established procedures for local government changes of organization, including city incorporation, annexation to a city or special district, and consolidation of cities or special districts (California Government Code Section 56000, et seq.). LAFCOs have numerous powers under the CKH Act, but those of prime concern are the power to act on local agency boundary changes and to adopt spheres of influence for local agencies. The law also states that in order to update a Sphere of Influence, LAFCOs are required to first conduct a review of the municipal services provided in the county.

While LAFCo does not have any direct land use authority, the CKH Act assigns LAFCOs a significant role in planning issues by requiring them to consider a wide range of land use and growth factors when they consider proposals. California Government Code Section 56001 specifically states that "the logical formation and determination of local agency boundaries is an important factor in promoting orderly development and in balancing that development with sometimes competing State interests of discouraging urban sprawl, preserving open space and prime agricultural lands, [and] efficiently extending government services."

The CKH Act also requires LAFCOs to update spheres of influence for every city and special district every five years. The original deadline was January 2006, five years following the CKH Act becoming State law. That deadline was extended two years to January 2008. Every SOI update must be accompanied by an update of the municipal services review. Pursuant to Government Code Section 56430, Mendocino LAFCo conducts municipal service reviews for each agency under its jurisdiction. The municipal service reviews provide an in-depth look at provider service needs, use of resources, and possibilities for partnership with other agencies; and contain determinations that serve as guidelines to inform and support the LAFCo's decisions about Spheres of Influence. LAFCo and the City of Ukiah are currently in the process of updating the Municipal Service Review and Sphere of Influence for the City. These processes are occurring concurrently with preparation of this EIR; LAFCo can use this EIR to adopt the proposed SOI.

## **b. Regional Regulations**

### **2017 Mendocino County Regional Transportation Plan**

The Mendocino County Regional Transportation Plan (RTP), adopted in February 2018, is a plan outlining the Mendocino County Council of Governments' strategies for operating, managing, maintaining, and financing the region's transportation system in a way to advance the long-term goals of the communities within Mendocino County and the state of California. The RTP emphasizes a strategy of investing transportation funds and coordinating land use planning efforts to bring greater mobility and access to services for Mendocino County residents. Goals and policies within the RTP include coordinating land use and public investments in a way that improves accessibility to services, employment, and housing, and encouraging local entities to direct private development to priority urbanized areas where services can best be provided at lowest public cost and least environmental consequences (Mendocino County Council of Governments 2018).

## **c. Local Regulations**

### **Zoning**

Zoning is the primary tool used to implement a community's general plan. A major difference between a general plan and zoning ordinance is that the general plan provides general guidance on the location, type, and density of new growth and development over the long term, while the zoning ordinance provides detailed development and use standards for each parcel of land. The zoning ordinance divides the community into zoning districts and specifies the uses that are permitted, conditionally permitted, and in some instances, which uses are specifically prohibited within each district.

Typically, a zoning ordinance consists of text and a map delineating districts for such basic land uses as residential, commercial, and industrial, and establishing special regulations for historic preservation, floodplains, hillside development and other specific concerns. For each of the basic land uses, the zoning ordinance text typically includes an explanation of the purpose of the zoning district; a list of principals permitted and conditionally permitted uses; and standards for minimum lot size, density, height, lot coverage, setback, and parking. The zoning ordinance also typically describes procedures for processing discretionary approvals.

### **Ukiah Zoning Districts**

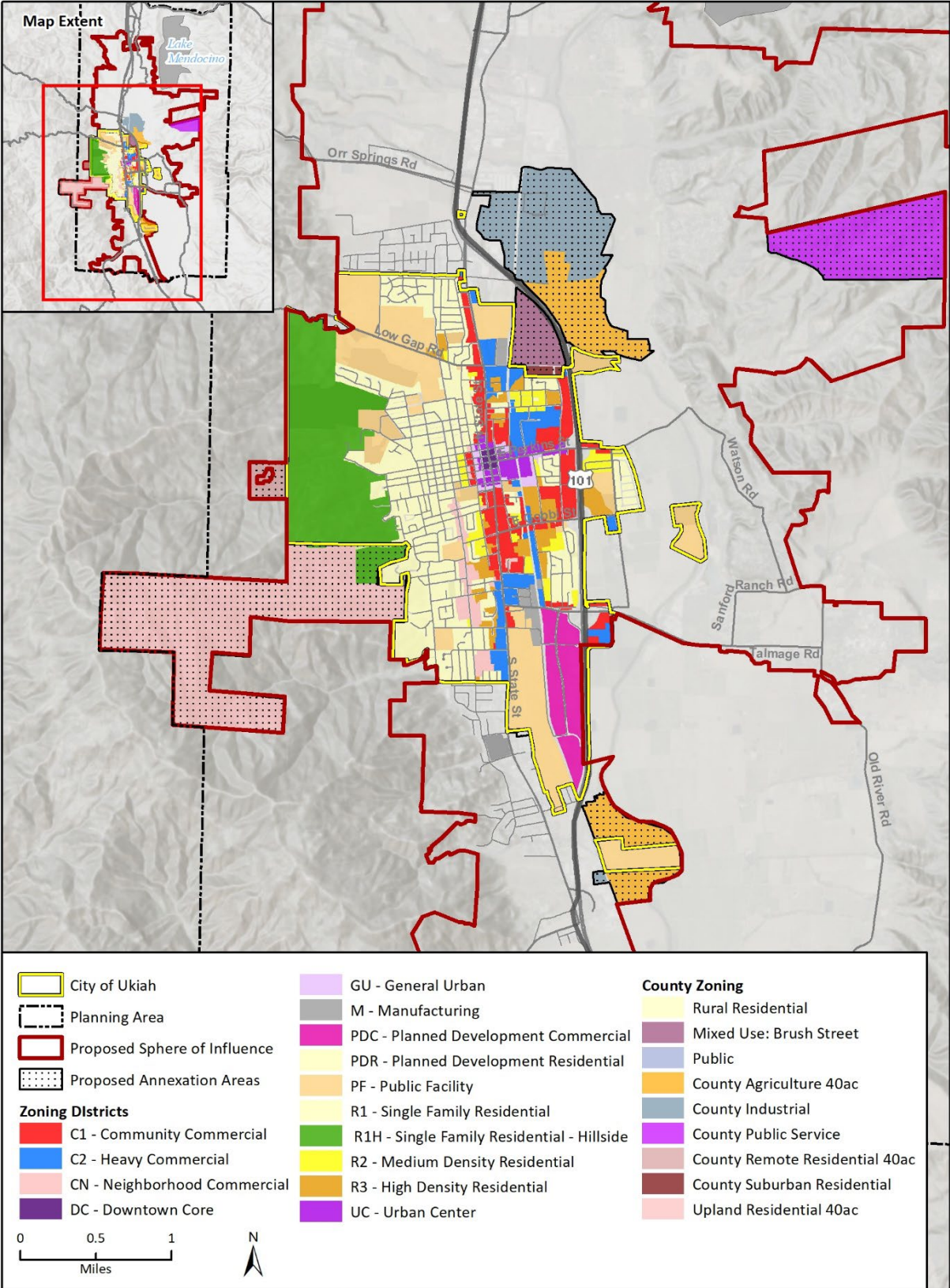
The City of Ukiah Zoning Ordinance (UCC Division 9, Chapter 2) contains 14 zoning districts (including two combining/overlay districts), as shown on Figure 4.7-2. Each zoning district has developed standards that are designed to protect and promote the health, safety, and general welfare of the community and to implement the policies of the General Plan. The zoning districts only apply to land within the City limits and the standards serve to preserve the character and integrity of existing neighborhoods. Within a typical district there are regulations related to land use, lot size, coverage, setbacks, building heights, parking, and landscaping.

The 14 zoning districts established by the Ukiah Zoning Ordinance are:

- **Residential Districts**
  - Low Density Residential (R-1)
  - Medium Density Residential (R-2)
  - High Density Residential (R-3)
- **Commercial Districts**
  - Neighborhood Commercial (C-N)
  - Community Commercial (C-1)
  - Heavy Commercial (C-2)
- **Industrial Districts**
  - Manufacturing (M)
- **Agricultural Districts**
  - Agricultural Exclusive (A-E)
- **Public Districts**
  - Public Facilities (PF)



Figure 4.7-2 Existing Zoning Districts



- **Downtown Zoning Districts**
  - General Urban (GU)
  - Urban Center (UC)
  - Downtown Core (DC)
- **Combining/Overlay Districts**
  - Agricultural (-A)
  - Hillside (-H)

## **Mendocino County Air Quality Management District Particulate Matter Attainment Plan and 2017 Clean Air Plan**

For a discussion of the 2005 Mendocino County Air Quality Management District Particulate Matter Attainment Plan and the 2017 Clean Air Plan, please refer to Section 4.3, *Air Quality*.

### 4.7.3 Impact Analysis

#### **a. Significance Thresholds and Methodology**

##### **Significance Thresholds**

Based on Appendix G of the CEQA Guidelines a project may be deemed to have a significant impact on land use and planning if it would:

1. Physically divide an established community; or
2. 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.

##### **Methodology**

The analysis in this section focuses on the compatibility of land uses identified in Ukiah 2040 with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental impacts. This section also analyzes whether development facilitated by the project, or its proposed policies would physically divide communities.

#### **b. Impacts and Mitigation Measures**

<b>Threshold 1:</b> Would the project physically divide an established community?
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**Impact LU-1 IMPLEMENTATION OF THE PROJECT WOULD MAINTAIN ORDERLY DEVELOPMENT IN THE PLANNING AREA AND WOULD NOT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

Most of the land in the Planning Area is currently developed. Vacant parcels comprise approximately 7.8 percent of land within the City, with most vacant parcels located within planned development areas. Residential uses make up approximately 49.2 percent of the City. As described in Section 2, *Project Description*, the project has a maximum buildout potential of an additional 2,350 housing units and an additional 4,514,820 non-residential square footage (City of Ukiah 2022). This buildout is projected to occur specifically within the existing City limits and Annexation Areas. Under this maximum build-out scenario, the additional housing and non-residential uses could lead



to an increase of approximately 5,640 residents in the city from 2022 to 2040. Development facilitated by the project could intensify some of the existing employment-generating land uses, which would increase the number of jobs in the Planning Area.

Ukiah 2040 would involve implementation of proposed policies and land use designations that identify the type and intensity of uses permissible in the Planning Area, as shown in Figure 4.7-3 . Intensity and density standards are established for each land use classification. The intent of the land use designations is to adequately classify and distinguish the various land uses needed within the Planning Area. The project also aims to direct growth within the City's sphere of influence and already developed areas to allow for the preservation of agricultural, rural, and open space lands.

Specifically, Ukiah 2040 would promote infill development; the redevelopment of abandoned, obsolete, or underutilized properties; and the adaptation of existing residential units to support multi-family use. Furthermore, the project contains goals and policies which relate to the physical structure, management, and appearance of the built environment.

The Land Use Element of Ukiah 2040 contains the following proposed goals and policies, which would maintain existing communities within the City of Ukiah and would ensure that established communities would not be divided by development facilitated by the project:

**Goal LU-7:** To ensure the orderly and timely growth and expansion of the City.

**Policy LU-7.1:** Development Pattern. The City shall ensure an orderly, contiguous development pattern that prioritizes infill development, phases new development, encourages compactness and efficiency, preserves surrounding open space and agricultural resources, and avoids land use incompatibilities.

**Goal LU-8:** To promote growth and development practices that improve quality of life, protect open space, natural and historical resources, and reduce resource consumption.

**Policy LU-8.1:** Contiguous Development. The City shall strongly discourage new development that is not contiguous with existing urban development.

**Policy LU-8.2:** Protection of Agricultural Areas. The City shall support the long-term economic viability of agriculture and agri-tourism and encourage landowners with land in agricultural production to undertake succession planning or agricultural preservation, as appropriate.

**Policy LU-8.3:** Infill Development. The City shall encourage population and employment growth toward infill development sites within the city.

**Policy LU-8.4:** Reuse of Underutilized Property. The City shall encourage property owners to revitalize or redevelop abandoned, obsolete, or underutilized properties to accommodate growth.

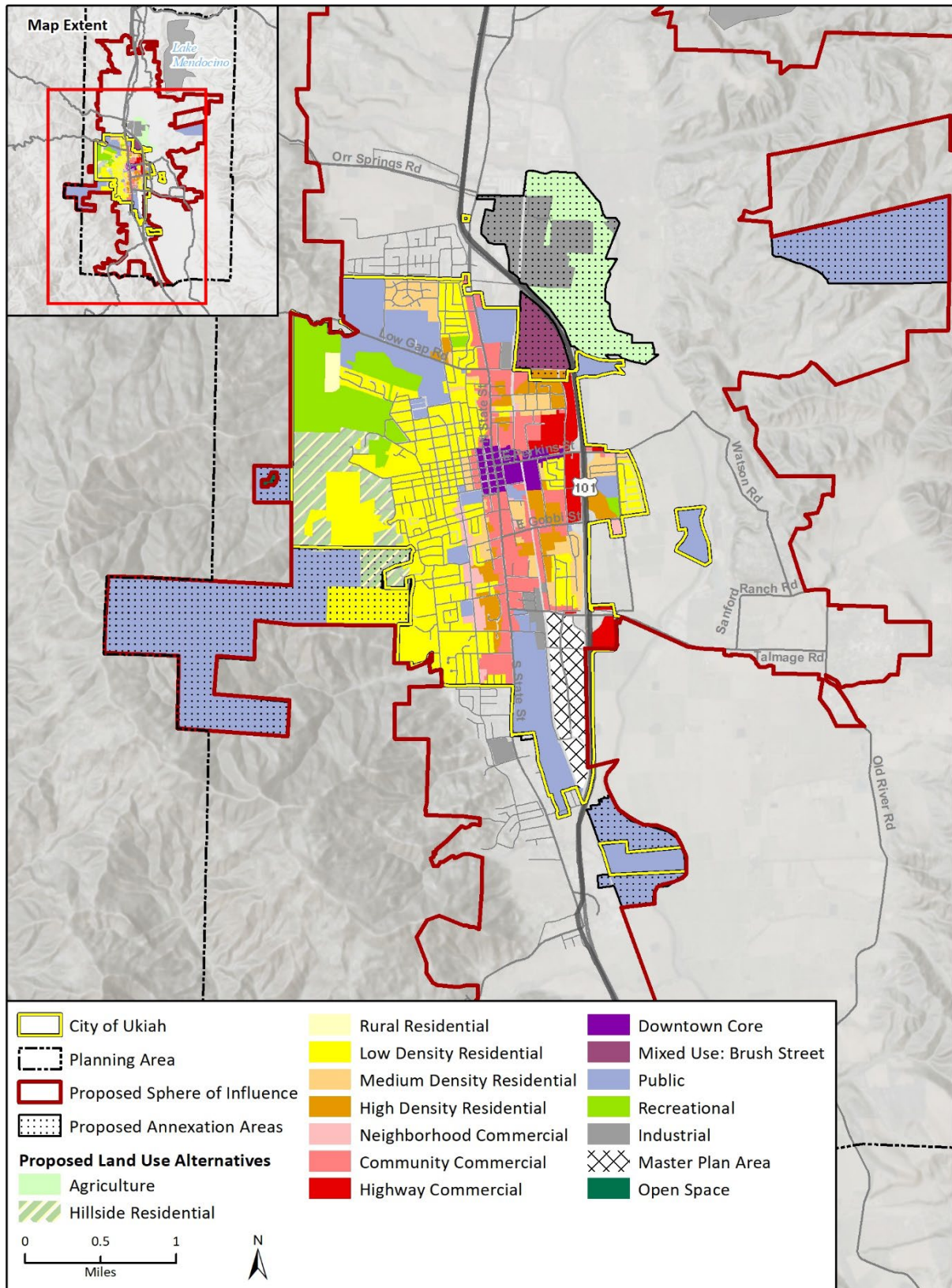
**Goal LU-10:** To assure coordination and consistency with special planning areas.

**Policy LU-10.1:** Downtown Zoning Code. The City shall update the Downtown Zoning Code to assure consistency with the General Plan goals, policies, and land use designations.

**Policy LU-10.2:** Ukiah Valley Community. The City shall recognize that the Ukiah Valley is one community and foster collaborative decision-making between the City, county, and other public agencies.

**Policy LU-10.3:** Ukiah Valley Area Plan. The City shall coordinate with Mendocino County to assure consistency with the Ukiah Valley Area Plan goals and policies.

**Figure 4.7-3 Proposed Land Use Designation Amendments**



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Additional data provided by City of Ukiah, 2022.

Fig X Proposed LU Alternatives

These policies would maintain existing communities in the City of Ukiah and would ensure that established communities would not be divided. Policy LU-7.1 would ensure orderly, contiguous development and would avoid land use incompatibilities, which would prevent division of existing communities. Policies LU-8.3 and LU-8.4 would encourage infill development and development of underutilized property, which facilitate development of vacant or underutilized properties to be consistent with their surrounding land uses. Additionally, Goal LU-10 and Policies LU-10.1 through LU-10.3 would ensure land use compatibility and consistency with special planning areas, including the Ukiah Valley Area Plan, which would avoid the division of existing communities. Furthermore, the project does not include proposed circulation changes, such as major roads or other facilities that would physically divide an established community. Therefore, the project would not physically divide the City of Ukiah or its established communities. Impacts would be less than significant.

### **Mitigation Measures**

No mitigation measures would be required.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation.

**Threshold 2:** Would the project 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?

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#### **Impact LU-2 IMPLEMENTATION OF THE PROJECT WOULD BE GENERALLY CONSISTENT WITH APPLICABLE LAND USE PLANS, POLICIES, OR REGULATIONS ADOPTED TO AVOID OR MITIGATE ENVIRONMENTAL EFFECTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

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Several regionally and locally adopted land use plans, policies, and regulations apply to the project. These include the Mendocino County RTP, the Ukiah Valley Area Plan, the Mendocino County Air Quality Management District 2005 Particulate Matter Attainment Plan (see Section 4.3, *Air Quality*), and the 2017 Clean Air Plan (see Section 4.3, *Air Quality*). Consistency of the project with the 2005 Particulate Matter Attainment Plan and the 2017 Clean Air Plan is discussed in Section 4.3, *Air Quality*. Consistency of Ukiah 2040 with applicable goals and policies of the Mendocino County RTP, the Ukiah Valley Area Plan, and the Mendocino County Airport Comprehensive Land Use Plan are identified below in Table 4.7-3, Table 4.7-4, and Table 4.7-5, respectively.

**Table 4.7-3 Project Consistency with Mendocino County Regional Transportation Plan**

Objective/Policy	Consistency
Encourage local entities to direct private development to priority urbanized areas where services can best be provided at lowest public cost and least environmental consequences.	<b>Consistent.</b> The Land Use Element of Ukiah 2040 includes proposed Policy LU-8.3, Infill Development, and Policy LU-8.4, Reuse of Underutilized Property, which encourage development to occur in infill development sites or within abandoned, obsolete, or underutilized properties. These policies will encourage development in already urbanized areas. The Mobility Element of Ukiah 2040 also includes proposed Policy MOB-1.8, New Development and Complete Streets, which enables the City to require new development to provide adequate access for pedestrians, bicyclists, motorists, and transit users, which will further facilitate the provision of transit services.
Provide a non-motorized transportation network that offers a feasible alternative to vehicular travel.	<b>Consistent.</b> The Mobility Element of Ukiah 2040 contains several proposed goals and policies related to alternative modes of transit. Policies include but are not limited to Policy MOB-1.2, Multi-Modal Access, which enables the City to require new development to include provisions for multi-modal access; Policy MOB-1.8, New Development and Complete Streets, which enables the City to require new development to provide adequate access for pedestrians, bicyclists, motorists, and transit users; and Policy MOB-2.1, which states that the City shall support transportation projects that help reduce vehicle miles traveled below regional averages.
Source: Mendocino County Council of Governments 2018	

**Table 4.7-4 Project Consistency with Ukiah Valley Area Plan**

Goal/Policy	Consistency
WM4.1e: Streambank protection. Develop, adopt, and oversee Best Management Practices for bank stabilization and erosion control to prevent erosion and siltation in drainage swales and streams.	<b>Consistent.</b> The Environment and Sustainability Element of Ukiah 2040 includes proposed Policy ENV-6.5, Creek Protection, which enables the City to require new development located adjacent to stream corridors to include appropriate measures for creek bank stabilization, erosion and sedimentation prevention, and natural creek channel preservation.
EA1.1e: Renewable resources. Preserve opportunities for development of renewable energy resources. Promote renewable energy.	<b>Consistent.</b> The Economic Development Element of Ukiah 2040 includes proposed Policy ED-2.2, Energy Infrastructure, which encourages the improvement of infrastructure to increase availability, reliability, sustainability, and use of renewable energy. This Element also includes proposed Policy ED-11.2, Green Economy, which states the City shall support the development of renewable energy generation. Further, the Environment and Sustainability Element of Ukiah 2040 includes proposed Policies ENV-1.3, ENV-8.3, and ENV-8.5, which promote electrification and energy efficiency within City-owned buildings and facilities.
EA1.1g: Green building standards. New construction shall comply with the California Green Building Code. Adopt and integrate green building standards into the development review and building permit process. Offer incentives to encourage green building practices.	<b>Consistent.</b> Development facilitated by the project would be required to comply with the California Green Building Code. The Economic Development Element also includes proposed Policy ED-11.2, Green Economy, which states the City shall support the development of renewable energy generation and industries and businesses that promote and enhance environmental sustainability, decarbonization, climate change adaptation, and resiliency.
OC 1.1: Protect the [Russian] river corridor and riparian habitat while accommodating responsible development.	<b>Consistent.</b> The Environment and Sustainability Element of Ukiah 2040 includes proposed Policy ENV-5.3, Russian River Riparian Area, which states the City shall support the County in maintaining the Russian River as a natural riparian corridor.

Goal/Policy	Consistency
OC1.2: Protect and maintain the Russian River Corridor channel elevation and banks.	<b>Consistent.</b> The Environment and Sustainability Element of Ukiah 2040 includes proposed Policy ENV-5.3, Russian River Riparian Area, and Policy ENV-6.5, Creek Protection, which would facilitate protection and maintenance of the Russian River.
OC2.3d: Zoning code: hillsides. Revise the zoning code to include standards for locating hillside roads and structures to minimize damage to natural hillside resources. Clearings for roads, buildings and fire protection purposes should be sited in the least visible and least ecologically damaging locations and screened with native vegetation where feasible. Encourage development to design and locate projects to minimize impacts on views of the hills from the Valley. New development should be subordinate to the natural setting and minimize the use of reflective surfaces. Buildings and building groups shall be sited, when feasible, near the toe of a slope and below a ridge.	<b>Consistent.</b> The Land Use Element of Ukiah 2040 includes proposed Policy LU-8.3, Infill Development, and Policy LU-8.4, Reuse of Underutilized Property, which encourage development to occur in infill development sites or within abandoned, obsolete, or underutilized properties. These policies will encourage development in already urbanized areas. This Element also includes proposed Goal LU-6, which aims to preserve the natural character of hillside development areas, and proposed Policy LU-6.2, Hillside Development, which enables the City to require new development in hillside areas to minimize grading, maintain a natural hillside setting, and be designed to preserve the ecological and scenic character of the hillsides.
OC3.1b: Agricultural Land Conversion Criteria. Proposals to convert Agricultural Lands to non-agricultural classification will be considered only after satisfying the following requirements: <ul style="list-style-type: none"> <li>▪ The project shall not result in a need for premature expansion of infrastructure in conflict with other Area Plan policies.</li> <li>▪ The project shall not have a significant adverse effect on agricultural uses in the area.</li> <li>▪ The project site is substantially unusable for agricultural purposes due to encroaching adjacent nonagricultural uses.</li> <li>▪ 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.</li> </ul>	<b>Consistent.</b> The Land Use Element of Ukiah 2040 includes proposed Policy LU-7.1, Development Pattern, which promotes orderly, contiguous development that preserves agricultural resources, among other resources. This Element also includes proposed Policy LU-8.2, Protection of Agricultural Areas, which states the City's support for the long-term economic viability of agriculture and agricultural preservation. Further, as discussed in Section 4.2, <i>Agricultural and Forestry Resources</i> , the project would not result in the conversion of designated agricultural land within the city or proposed annexation areas.

Goal/Policy	Consistency
HA2.1: protect known cultural and archaeological sites.	<b>Consistent.</b> The Environment and Sustainability Element of Ukiah 2040 includes proposed Goal ENV-3, which intends to preserve and protect historic and archaeological resources in Ukiah, and several related policies. This Element includes proposed Policy ENV-3.2, Archaeological Resource Impact Mitigation, which states the City shall ensure appropriate and feasible mitigation for new development that has potential to impact sites likely to contain archaeological, paleontological, cultural, or tribal resources. Furthermore, as discussed in Sections 4.5, <i>Cultural Resources</i> , and 4.12, <i>Tribal Cultural Resources</i> , the project would involve implementation of Mitigation Measures CR-1, CR-2, TCR-1, and TCR-2, which would reduce impacts to cultural and tribal cultural resources.
Source: County of Mendocino 2011	

**Table 4.7-5 Project Consistency with Ukiah Municipal Airport Land Use Compatibility Plan**

Goal/Policy	Consistency
3.1.1.1. Statutory requirement. State law requires each Local Agency having territory within an Airport Influence Area to modify its general plan and any applicable specific plan to be consistent with the airport land use compatibility plan for the particular airport unless it takes the steps required to Overrule the ALUC. In order for a general plan to be considered consistent with this UKIALUCP, the following must be accomplished: [see Policy 3.1.2, below].	<b>Consistent.</b> The City of Ukiah would comply with Section 21676(b) of the Public Utilities Code, which states that the adoption or approval of any amendment to a general or specific plan affecting the property within an airport's planning area shall be referred to the Airport Land Commission for determination of consistency prior to approval of Ukiah 2040.
3.1.1.2. Elimination of Conflicts. No direct conflicts can exist between the two plans.	<b>Consistent.</b> As shown in Figure 2-3 of Section 2, <i>Project Description</i> , existing land use designations in the vicinity of Ukiah Municipal Airport include Commercial, Industrial, Master Plan Areas, and Low to Medium Density Residential. As shown in Figure 2-4 of Section 2, <i>Project Description</i> , proposed lands uses in the vicinity of the airport include Community Commercial, Neighborhood Commercial, Industrial, Master Plan Areas, and Low to Medium Residential. Therefore, the project would not substantially convert existing land uses to other uses.
(a) Direct conflicts primarily involve general plan land use designations that do not meet the Density or Intensity criteria specified in Table 3A, Basic Compatibility [see UKIALUCP]. In addition, conflicts with regard to other policies—height limitations in particular—may exist.	Furthermore, Ukiah 2040 would include several policies, including proposed Policies LU-10.4 through LU-10.6, which state that the City shall periodically update the Ukiah Airport Master Plan to reflect current airport needs; require new development within airport zones to conform to height, use, and intensity specified in the Ukiah Municipal Airport Land Use Compatibility Plan; and refer new development projects near the Ukiah Airport to the Mendocino County Airport Land Use Commission for review and comment. Additionally, the project would also include proposed Policies SAF-7.3 and SAF-7.4, which states that the City shall require disclosure of potential airport noise impacts for properties located within the noise contours of the airport and require incorporation of sound reducing measures in new development in the airport compatibility zones.
(1) However, a general plan cannot be found inconsistent with the UKIALUCP because of land use designations that reflect Existing Land Uses even if those designations conflict with the compatibility criteria of this UKIALUCP.	Therefore, the project would not convert existing land uses near the airport and would include policies that would ensure land use consistency in the vicinity of the airport. The project would be consistent with this policy.
General plan land use	

Goal/Policy	Consistency
	designations that merely echo the Existing Land Uses are exempt from requirements for general plan consistency with the UKIALUCP.
(2) On the other hand, proposed Redevelopment or other changes to Existing Land Uses are not exempt from compliance with this UKIALUCP and are subject to ALUC review in accordance with Policies 1.5.3(d) and 1.4.5(b)(9). To ensure that Nonconforming Uses do not become more nonconforming, general plans or implementing documents must include policies setting limitations on expansion and Reconstruction of Nonconforming Uses located within the Airport Influence Area consistent with Policies 3.3.1 and 3.3.4.	
(b) To be consistent with the UKIALUCP, a general plan and/or implementing ordinance also must include provisions ensuring long-term compliance with the compatibility criteria. For example, future reuse of a building must not result in a usage Intensity that exceeds the applicable standard or other limit approved by the ALUC.	

Source: Mendocino County Airport Land Use Commission 2021

As demonstrated above, goals and policies of Ukiah 2040 would be consistent with goals, policies, and strategies of the Mendocino County Regional Transportation Plan, the Ukiah Valley Area Plan, and the Ukiah Municipal Airport Land Use Compatibility Plan. Therefore, impacts would be less than significant.

Ukiah 2040 itself is a land use plan that contains policies that will be adopted, in part, for the purpose of avoiding or mitigating an environmental effect. In the future, projects consistent with Ukiah 2040 will be able to use this EIR for a streamlined environmental review process. State CEQA Guidelines Section 15183 allows for a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan, or general plan

policies for which an EIR was certified. To be eligible for streamlined review under CEQA Guidelines Section 15183, the following findings must be made based on an initial study or other analysis:

- The project is consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified.
- There are no project-specific effects that are peculiar to the project or its site.
- There are no project-specific impacts that the prior EIR failed to analyze as significant effects.
- There are no potentially significant offsite and/or cumulative impacts that the prior EIR failed to evaluate.
- There is no substantial new information that results in more severe impacts than anticipated by the prior EIR.

Overall, Ukiah 2040 contains four geographic elements: the Planning Area, the proposed sphere of influence (SOI), the City limits, and the Annexation Areas. The City has identified updated and new land uses within the City limits and the Annexation Areas. No new or amended land uses have been identified for the remaining areas within the proposed SOI or Planning Area, and the City would not change existing zoning within these areas. Future projects within the Planning Area, proposed SOI, City limits, and Annexations Areas may qualify for streamlined environmental review under CEQA Guidelines Section 15183. See Section 1.6, *Intended Uses of the EIR*, for more information.

### **Mitigation Measures**

No additional mitigation measures for land use are planning would be required beyond those identified throughout this EIR, including Mitigation Measures CR-1, CR-2, TCR-1, and TCR-2.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation, beyond those identified throughout this EIR.



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## 4.8 Noise

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This section analyzes noise-related impacts associated with development facilitated by the project, including temporary noise impacts from construction activity and long-term noise impacts from operation.

### 4.8.1 Setting

#### **a. Overview of Noise and Vibration**

##### **Noise**

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

##### *Human Perception of Sound*

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dBA; dividing the energy in half would result in a 3 dBA decrease (Caltrans 2013).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud (10.5 times the sound energy) (Caltrans 2013).

##### *Sound Propagation and Shielding*

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in the noise level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g., point or line), the path the sound will travel, site conditions, and obstructions.

Sound levels are described as either a “sound power level” or a “sound pressure level,” which are two distinct characteristics of sound. Both share the same unit of measurement, the dBA. However, sound power is the energy converted into sound by the source. As sound energy travels through the air, it creates a sound wave that exerts pressure on receivers, such as an eardrum or microphone, which is the sound pressure level. Sound measurement instruments only measure sound pressure, and noise level limits are typically expressed as sound pressure levels.

Noise levels from a point source (e.g., construction, industrial machinery, air conditioning units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5 dBA reduction in source noise levels at the receiver. Structures can substantially reduce exposure to noise as well. Modern building construction generally provides an exterior-to-interior noise level reduction of 15 dBA with open windows and an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

### *Noise Descriptors*

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. The noise descriptors used for this study are the equivalent noise level ( $L_{eq}$ ), and the Day-Night Average Level (DNL; may also be symbolized as  $L_{dn}$ ).

$L_{eq}$  is one of the most frequently used noise metrics; it considers both duration and sound power level. The  $L_{eq}$  is defined as the single steady-state A-weighted sound level equal to the average sound energy over a period. When no period is specified, a 1-hour period is assumed. The  $L_{max}$  is the highest noise level within the sampling period, and the  $L_{min}$  is the lowest noise level within the measuring period. Normal conversational levels are in the 60 to 65-dBA  $L_{eq}$  range; ambient noise levels greater than 65 dBA  $L_{eq}$  can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (DNL or  $L_{dn}$ ), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.).<sup>1</sup> The relationship between the peak-hour  $L_{eq}$  value and the  $L_{dn}$  depends on the distribution of noise during the day, evening, and night. Quiet suburban areas typically have  $L_{dn}$  noise levels in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 60+ dBA  $L_{dn}$  range (FTA 2018).

## **Groundborne Vibration**

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hertz. The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body is from a low of less than 1 Hertz up to a high of about 200 Hertz (Crocker 2007). Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration.

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction

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<sup>1</sup> Because DNL is typically used to assess human exposure to noise, the use of A-weighted sound pressure level (dBA) is implicit. Therefore, when expressing noise levels in terms of DNL, the dBA unit is not included.

activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hertz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (FTA 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Discontinuities in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020a). When a building is impacted by vibration, a ground-to-foundation coupling loss will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or root mean square (RMS) vibration velocity. The PPV is normally described in inches per second (in/sec) and RMS is normally described in vibration decibels (VdB). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration and other construction activity because it is related to the stresses that are experienced by buildings (Caltrans 2020a). Table 4.8-1 summarizes the vibration damage criteria recommended by the FTA for evaluating the potential for architectural damage to buildings.

**Table 4.8-1 Criteria for Vibration Damage Potential**

Building Category	PPV (in/sec)
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Nonengineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

in/sec = inches per second; PPV = peak particle velocity

Source: FTA 2018

In addition to the potential for building damage, the human body responds to vibration signals. However, unlike buildings, which are rigid, it takes some time for the human body to respond to vibration. In a sense, a building responds to the instantaneous movement while the human body responds to average vibration amplitude, which is measured as RMS. The averaging of the particle generally results in the RMS conservatively being equivalent to 71 percent of the PPV. Thus, human annoyance usually results in a more restrictive vibration limit than structural damage limits.

## **b. Local Noise Setting**

### **Noise In Ukiah**

Significant noise sources in the City include traffic on major roadways and highways, the Ukiah Municipal Airport, and industrial activities. U.S. Highway 101, North and South State Street, East Perkins Street, East Gobbi Street, and Talmage Road are the primary roadways that contribute to ambient noise. Ukiah contains fixed industrial noise sources in the northeastern portion of the City. Furthermore, although there are railroad tracks located in the City, the railroad is not operational and does not contribute noise in Ukiah. As such, there would be no noise impacts from railroads, and railroad noise is not discussed further in this EIR.

The Ukiah Municipal Airport is in the southern portion of the City. The Ukiah Municipal Airport is comprised of one 4,400 foot runway over 160 acres, and has 87 aircraft based on site. The Ukiah Municipal Airport is not a commercial airport, but provides aircraft repair, rental, and maintenance services and emergency fire and medical services (City of Ukiah 2022). Existing land uses near the airport are low-to-moderate-density urban to the north and west as well as immediately to the east between the airport and U.S. Highway 101. An Airport Land Use Compatibility Plan (ALUCP) for the Ukiah Municipal Airport was adopted by the Mendocino County Airport Land Use Commission (ALUC) in May 2021 (Mendocino County 2021). Airport noise contours are shown in Figure 4.8-1.

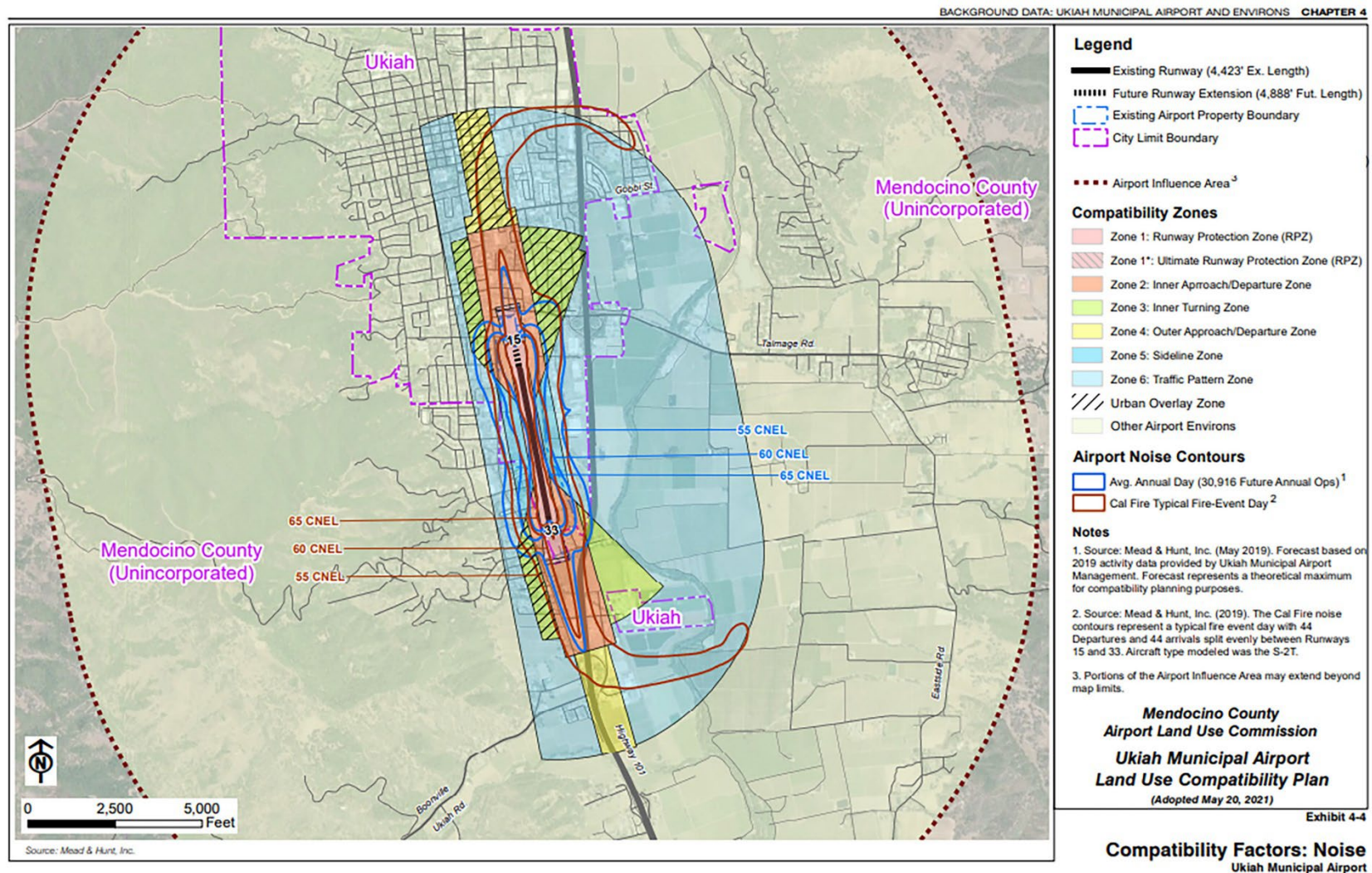
Stationary sources of noise within Ukiah include noise generated by residential activity and machinery or processes at commercial uses. A primary source of stationary noise at these uses is the use of heating, ventilation, and air conditioning (HVAC) units.

Sources of vibration in the City arise from vehicular traffic. Like vehicle noise, vehicular vibration can affect receivers along roadways and depends on pavement, and the type and weight of the vehicle. Vibration may also be generated by construction equipment (e.g., earth-moving equipment and pile driving); however, these sources are temporary and vary on a project-by-project basis. In addition, existing commercial or industrial activities may generate vibration from the use of heavy equipment.

### **Sensitive Receivers**

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Noise-sensitive land uses are those that may be subject to stress and/or interference from excessive noise. Noise-sensitive land uses include residential uses, schools, childcare centers, hospitals, nursing homes, parks and recreational areas, and institutional uses such as churches, libraries, and museums. Vibration sensitive receivers are like noise-sensitive receivers and also include historical, fragile buildings. Potential sensitive receivers which may be impacted by development facilitated by Ukiah 2040 would primarily be residential uses, schools, and churches.

Figure 4.8-1 Ukiah Municipal Airport Compatibility Zones and Noise Contours



## 4.8.2 Regulatory Setting

### a. Federal Regulations

#### Department of Housing and Urban Development

The federal Department of Housing and Urban Development (HUD) sets environmental criteria and standards in Title 24 of the Code of Federal Regulations (CFR), Part 51. New construction proposed in areas that exceed 65 dBA  $L_{dn}$  must incorporate noise attenuation features to maintain interior noise levels at 45 dBA  $L_{dn}$ . Development in areas exceeding 65 dBA  $L_{dn}$  requires further attenuation features. In general, the HUD regulations match the California state regulations discussed below.

#### Federal Transit Administration

The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction in their *Transit and Noise Vibration Impact Assessment Manual* (FTA 2018). For residential uses, the daytime noise threshold is 80 dBA  $L_{eq}$  for an 8-hour period.

#### Occupational Health and Safety Administration

The federal government regulates occupational noise exposure common in the workplace through the Occupational Health and Safety Administration (OSHA) under the EPA. Noise limitations would apply to the operation of construction equipment and could also apply to any proposed industrial land uses. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required under OSHA, and is not addressed further in this analysis.

#### Federal Aviation Administration

The Federal Aviation Administration (FAA) enforces Title 14, Part 150 of the CFR, which governs airport noise compatibility programs and identifies land uses that are normally compatible with various levels of noise exposure. The FAA has determined that sound levels up to 45 dB CNEL are acceptable within residential buildings. As discussed in Section 4.8.1, *Setting*, parts of Ukiah are located within noise contours from the Ukiah Municipal Airport and would require implementation of the FAA standards.

### b. State Regulations

#### California General Plan Guidelines

State law requires general plans to include a Noise Element under Government Code Section 65302(f). The California General Plan Guidelines, published by the Governor's Office of Planning and Research, indicate acceptable, specific land use types in areas with specific noise exposure. The guidelines also offer adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. These guidelines are advisory, and local jurisdictions have the authority to set specific noise standards based on local conditions.

## **California Building Code**

California Code of Regulations Title 24, Building Standards Administrative Code, Part 2, Chapter 12, and the California Building Code codify the State noise insulation standards. These noise standards apply to new construction in California to control interior noise levels as they are affected by exterior noise sources and interior noise sources from separate areas. The regulations specify that interior noise levels shall not exceed 45 dB CNEL/ $L_{dn}$  in any habitable room, as well as specifying sound transmission class requirements for walls, floors, and ceilings around sleeping units.

## **California Green Building Code**

California Green Building Standards Code 2019 (CALGreen) Section 5.507.4, Acoustical Control, regulates construction of non-residential uses within the 65 dBA CNEL/ $L_{dn}$  contour of an airport, freeway, expressway, railroad, industrial noise source, or other fixed source. According to Section 5.507.4.1.1 “buildings exposed to a noise level of 65 dB  $L_{eq}(1\text{-hr})$  during any hour of operation shall employ sound-resistant assemblies as determined by a prescriptive method (CALGreen Section 5.507.4.1) or performance method (CALGreen Section 5.507.4.2).

Projects may demonstrate compliance through the prescriptive method if wall and roof-ceiling assemblies exposed to the noise source meet a composite sound transmission class (STC) rating of at least 50 or a composite outdoor/indoor transmission class (OITC) rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30. Projects may demonstrate compliance through the performance method if wall and roof-ceiling assemblies exposed to the noise source are constructed to provide an interior noise environment that does not exceed 50 dB  $L_{eq-1Hr}$  in occupied areas during hours of operations.

## **California Airport Noise Standards**

California Code of Regulations Title 21, Subchapter 6, Airport Noise Standards, establishes 65 dBA CNEL as the acceptable level of aircraft noise for persons living in the vicinity of airports. Noise-sensitive land uses are generally incompatible in locations where the aircraft exterior noise level exceeds 65 dBA CNEL. This standard remains unless an aviation easement for aircraft noise has been acquired by the airport proprietor, or the residence is a high-rise with an interior CNEL of 45 dBA or less in all habitable rooms. Assembly Bill (AB) 2776 requires any person who intends to sell or lease residential properties in an airport influence area to disclose that fact to the person buying the property.

## **c. Local Regulations**

### **Ukiah City Code**

Section 6048 of the Ukiah Municipal Code includes a noise ordinance (Division 7, Chapter 1, Article 6), which establishes exterior noise level standards from stationary sources for specific zoning districts, as shown in Table 4.8-2.



**Table 4.8-2 Ambient Base Noise Level Standards**

Zone	Time	Noise Level Standards (dBA)
R1 & R2	10 pm to 7 am	40
R1 & R2	7 pm to 10 pm	45
R1 & R2	7 am to 7 pm	50
R3	10 pm to 7 am	45
R3	7 am to 10 pm	50
Commercial	10 pm to 7 am	60
Commercial	7 am to 10 pm	65
Industrial (M)	Anytime	70

Notes: Where the ambient noise level is less than designated in Section 6048, the respective noise level in this Section 6048 shall govern.

It should be noted that these base noise level standards were last updated in 1983 and may not reflect the current ambient base levels within the City.

Source: Ukiah Municipal Code Division 7, Chapter 1, Article 6

Section 6053 of the Ukiah City Code establishes that it is unlawful for any machinery, equipment, pump, fan, air conditioning, or similar mechanical device to create noise at any property line in exceedance of the ambient base noise level, by more than five decibels during nighttime hours (7 p.m. to 7 a.m.). Section 6054 of the Ukiah City Code establishes that it is unlawful for construction within 500 feet of a residential zone to occur during nighttime hours (7 p.m. to 7 a.m.) in such a manner that a reasonable person would be discomforted or annoyed, unless a permit is acquired by the Director of Public Works.

### **Ukiah Municipal Airport Land Use Compatibility Plan**

The operation of the Ukiah Municipal Airport, located in southwest Ukiah, affects development in a significant portion of the city through the enforcement of the six Airport Land Use Compatibility Zones, with the addition of an overlay zone to two of the zones, which functionally creates restrictions on development within the vicinity of the airport based on proximity to the airport and flight path. Specifically, Chapter 3 of the Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP) lists restrictions for each land use within each Compatibility Zone related to height, density (both residential and non-residential), land use, noise, and open land (see UKIALUCP Table 3A for a summary of restrictions and development standards). These standards are intended to promote compatibility between the Ukiah Municipal Airport and surrounding land uses and were applied to each of the land use designations.

Additionally, per UKIALUCP Policy 3.2.8(b), recording of an Overflight Notification is required as a condition for approval of new residential or nonresidential projects in Compatibility Zone 6 and an Avigation Easement Dedication is required for projects within zoned 1 through 5.

Lastly, per UKIALUCP Policy 1.4.5, certain major land use projects and projects that question compatibility with the UKIALUCP require formal review by the Mendocino County Airport Land Use Commission (ALUC).

### 4.8.3 Impact Analysis

#### **a. Significance Thresholds and Methodology**

##### **Significance Thresholds**

According to Appendix G of the CEQA Guidelines, impacts related to noise and vibration from implementation of the project would be significant if it would:

1. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
2. Generate excessive groundborne vibration or groundborne noise levels; or
3. For a project located within the vicinity of a private airstrip or 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, expose people residing or working in the project area to excessive noise levels.

Specific thresholds of significance for construction, operation, and vibration are as follows.

##### *Construction Noise*

New development facilitated by Ukiah 2040 could have a significant impact if temporary construction noise during permitted daytime hours exposed noise-sensitive receivers to significantly adverse noise levels, or if construction noise occurred outside the hours detailed in Ukiah City Code Section 6054. As the City does not define a quantitative construction noise threshold, for purposes of analyzing impacts from the project, the City has determined that the FTA construction criteria are applicable to the project. The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction in their *Transit and Noise Vibration Impact Assessment Manual* (FTA 2018). For residential uses, the daytime noise threshold is 80 dBA  $L_{eq}(8hr)$  for an 8-hour period. Construction noise would be significant if it exceeds this threshold.

##### *Operational Noise*

A project normally has a significant effect on the environment related to noise if it substantially increases the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions. Changes of 1 to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an exterior environment. Based on this, the following thresholds of significance are used to assess traffic noise impacts at sensitive receiver locations:

- Greater than 1.5 dBA increase for ambient noise environments of 65 dBA CNEL and higher
- Greater than 3 dBA increase for ambient noise environments of 60-64 CNEL
- Greater than 5 dBA increase for ambient noise environments of less than 60 dBA CNEL

##### *Vibration*

The City has not adopted a significance threshold to assess vibration impacts during construction and operation. Therefore, criteria from the FTA are used to evaluate potential construction vibration impacts related to potential building damage from construction (FTA 2018). Construction vibration

impacts from development would be significant if vibration levels exceed the FTA criteria shown in Table 4.8-1.

## **Methodology**

### *Construction Noise*

Construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in a single location for one or more days at a time, with either fixed-power operation (e.g., pumps, generators, and compressors) or variable-power operation (e.g., pile drivers, rock drills, and pavement breakers). Mobile equipment moves around a construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders (FTA 2018). Each phase of construction has its own noise characteristics due to specific equipment mixes. Some have higher continuous noise levels than others and some may have high-impact intermittent noise levels (FTA 2018). Construction noise levels may fluctuate depending on the type of equipment being used, construction phase, or equipment location. In typical construction projects on vacant sites, grading activities typically generate the highest noise levels because grading involves the largest equipment and covers the greatest area.

Variation in power imposes difficulty in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity to determine the  $L_{eq}$  of operating the equipment (FHWA [Federal Highway Administration] 2018). It is common for programmatic environmental analysis to utilize a conservative standard reference distance of 50 feet. Project-level noise analyses for future development due to Ukiah 2040 will use site specific conditions and the estimated distances between proposed pieces of equipment and phases to the nearest off-site sensitive receiver, which may be further than 50 feet.

Heavy construction equipment during grading and site preparation for future development would typically include bulldozers, excavators, front-end loaders, dump trucks, and graders. For the purposes of this analysis, it is assumed that diesel engines would power all construction equipment. Construction equipment would not all operate at the same time or location due to the different tasks performed by each piece of equipment. In addition, construction equipment would not be in constant use during the 8-hour operating day.

Impact devices such as pile drivers could be used for construction of future development. Although use of pile drivers is uncommon during construction for the type of development facilitated by Ukiah 2040, pile driving could be required for some ground types or subterranean parking facilities. As such, this analysis considers the potential for use of this equipment as a conservative analysis. A pile driver is used to drive foundation piles into the ground. These devices would typically operate separately from other equipment. Typical noise levels associated with the types of heavy equipment most likely to be utilized during development associated with the project are shown in Table 4.8-3.

**Table 4.8-3 Construction Equipment Noise Levels**

Equipment	Typical Noise Level (dBA) at 50 Feet from Source
Concrete Mixer	85
Dozer	85
Grader	85
Jackhammer	88
Loader	80
Paver	85
Pile-driver (Impact)	101
Pile-driver (Sonic)	95
Truck	84
Sources: FTA 2018	

#### *On-Site Operational Noise*

The primary on-site noise sources associated with operation of residential units, and those discussed in this analysis, would include noise from stationary HVAC equipment, on-site vehicle movement (e.g., trash hauling), and outdoor activities.

#### *Traffic Noise*

Traffic noise levels for existing and project conditions were estimated using the FHWA traffic noise prediction model methodology. Traffic noise impacts are analyzed based on average daily traffic (ADT) roadway volume for existing conditions (2020) and Ukiah 2040 conditions, as well as speeds, and number of lanes data. The FHWA model predicts noise levels through a series of adjustments to a reference sound level. These adjustments account for distances from the roadway, traffic volumes, vehicle speeds, car/truck mix, number of lanes, and road width.

#### *Groundborne Vibration*

Construction activities have the greatest potential to generate ground-borne vibration affecting nearby receivers, especially during grading and excavation. The greatest vibratory source during construction activities is anticipated to be a vibratory roller; however, an impact pile driver may be used during specific construction phases and could generate higher vibration than vibratory roller. Table 4.8-4 shows typical vibration levels for various pieces of construction equipment used in the assessment of construction vibration (FTA 2018).

**Table 4.8-4 Typical Vibration Levels for Construction Equipment**

Equipment	PPV (Inches/Second) at 25 Feet
Pile Driver (Impact – upper range)	1.518
Pile Driver (Sonic – upper range)	0.734
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Sources: FTA 2018.	

Because groundborne vibration could cause physical damage to structures and is measured in an instantaneous period, vibration impacts are typically modeled based on the distance from the location of vibration-intensive construction activities, which is conservatively assumed to be edge of a project site, to the edge of the nearest off-site structures. For assessment purposes, potential vibration impacts from construction activities were modeled at a reference distance of 25 feet due to setback distances between equipment and off-site structures.

## **b. Project Impacts and Mitigation Measures**

**Threshold 1:** Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

**Impact NOI-1 CONSTRUCTION OF INDIVIDUAL PROJECTS FACILITATED BY UKIAH 2040 WOULD TEMPORARILY INCREASE NOISE LEVELS, POTENTIALLY AFFECTING NEARBY NOISE-SENSITIVE LAND USES. DEVELOPMENT FACILITATED BY THE PROJECT WOULD INTRODUCE NEW ON-SITE NOISE SOURCES AND WOULD CONTRIBUTE TO INCREASES IN TRAFFIC NOISE. THE CONTINUED REGULATION OF ON-SITE NOISE, CONSISTENT WITH THE UKIAH CITY CODE AND IMPLEMENTATION OF PROPOSED UKIAH 2040 POLICIES WOULD MINIMIZE DISTURBANCE TO ADJACENT LAND USES. HOWEVER, CONSTRUCTION NOISE AND TRAFFIC NOISE MAY STILL EXCEED NOISE STANDARDS AND IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.**

## **Construction Noise**

Noise from construction of future development projects facilitated by Ukiah 2040 could temporarily increase ambient noise levels at adjacent property lines. Since there are no specific plans or time scales for future projects, it is not possible to determine exact noise levels or time periods for construction of such projects.

Nonetheless, Table 4.8-3 illustrates typical noise levels of construction equipment at 50 feet. Noise would typically drop by approximately 6 dBA per doubling of distance. As such, noise levels would be approximately 6 dBA lower than shown in Table 4.8-3 at 100 feet from the noise source and 12 dBA lower at 200 feet from the noise source. Construction from Ukiah 2040 may involve the operation of pile drivers. Pile foundations are generally used under two situations: 1) when there is a layer of weak soil at the ground surface that cannot support the weight of a building; or 2) when a

building or structure has very heavy, concentrated loads, such as in a high-rise structure, bridge, or water tank.

As shown in Table 4.8-3, noise levels at 50 feet from construction activities could approach 88 dBA  $L_{max}$  with typical heavy-duty construction equipment such as a jackhammer, and up to 101 dBA  $L_{max}$  with more intensive equipment such as an impact pile driver. Both scenarios could exceed the daytime FTA construction noise thresholds of 80 dBA  $L_{eq}$ , for an 8-hour period for residential uses. Construction noise could, therefore, increase ambient noise levels and may temporarily disturb people at neighboring properties. Compliance with Ukiah City Code Section 6054, which limits construction to certain hours and days, would minimize construction noise impacts. However, it cannot be guaranteed that construction noise would not result in a substantial increase over ambient noise levels or that nighttime construction noise may sometimes be necessary (i.e., if pumps need to run continuously or for concrete pours). The construction noise threshold of 80 dBA  $L_{eq}$  daytime at residential uses could be exceeded during future development under the project, resulting in a potentially significant impact. Mitigation Measure NOI-1 would be required to minimize noise during construction.

## Operations

### *Noise from On-Site Stationary Equipment*

Noise generated by on-site stationary equipment for new development would be subject to the City's noise limits (pursuant to Ukiah City Code Section 6048), shown in Table 4.8-2. For large buildings, HVAC units are typically located on the roof, where operational noise is greatly reduced by distance and the intervening building itself; however, for smaller buildings (including smaller multi-family residential units), HVAC units are often placed at ground level on a concrete pad adjacent to the building. Existing noise sensitive receivers could be affected by operational noise occurring on-site at future development sites.

Ukiah City Code Section 6053 limits noise from permanent stationary mechanical equipment, such as HVAC units, to 5 dBA above maximum ambient noise levels that are listed in Section 6048, during nighttime hours. Adherence to Ukiah City Code noise limits for HVAC and other stationary noise sources associated with future development would ensure that operational stationary noise is less than significant. Industrial development in annexation areas would not be adjacent to sensitive receivers. Furthermore, implementation of the following proposed Ukiah 2040 goals and policies would ensure that development facilitated by Ukiah 2040 would undergo adequate review and mitigation to maintain noise levels at appropriate levels.

**Goal SAF-8:** To reduce noise impacts through the enforcement of appropriate building and land use codes.

**Policy SAF-8.2:** Noise Impact Analysis. The City shall ensure adequate analysis of noise impacts when reviewing project permits.

**Policy SAF-8.3:** Noise Attenuation Requirements. The City shall require all new commercial and manufacturing uses that could produce excessive noise to incorporate applicable noise mitigation measures to reduce noise levels to acceptable levels.

**Policy SAF-8.4:** Acoustical Studies. The City shall require acoustical studies for all new development projects with potential to generate excessive noise to identify potential noise impacts and appropriate mitigation measures.

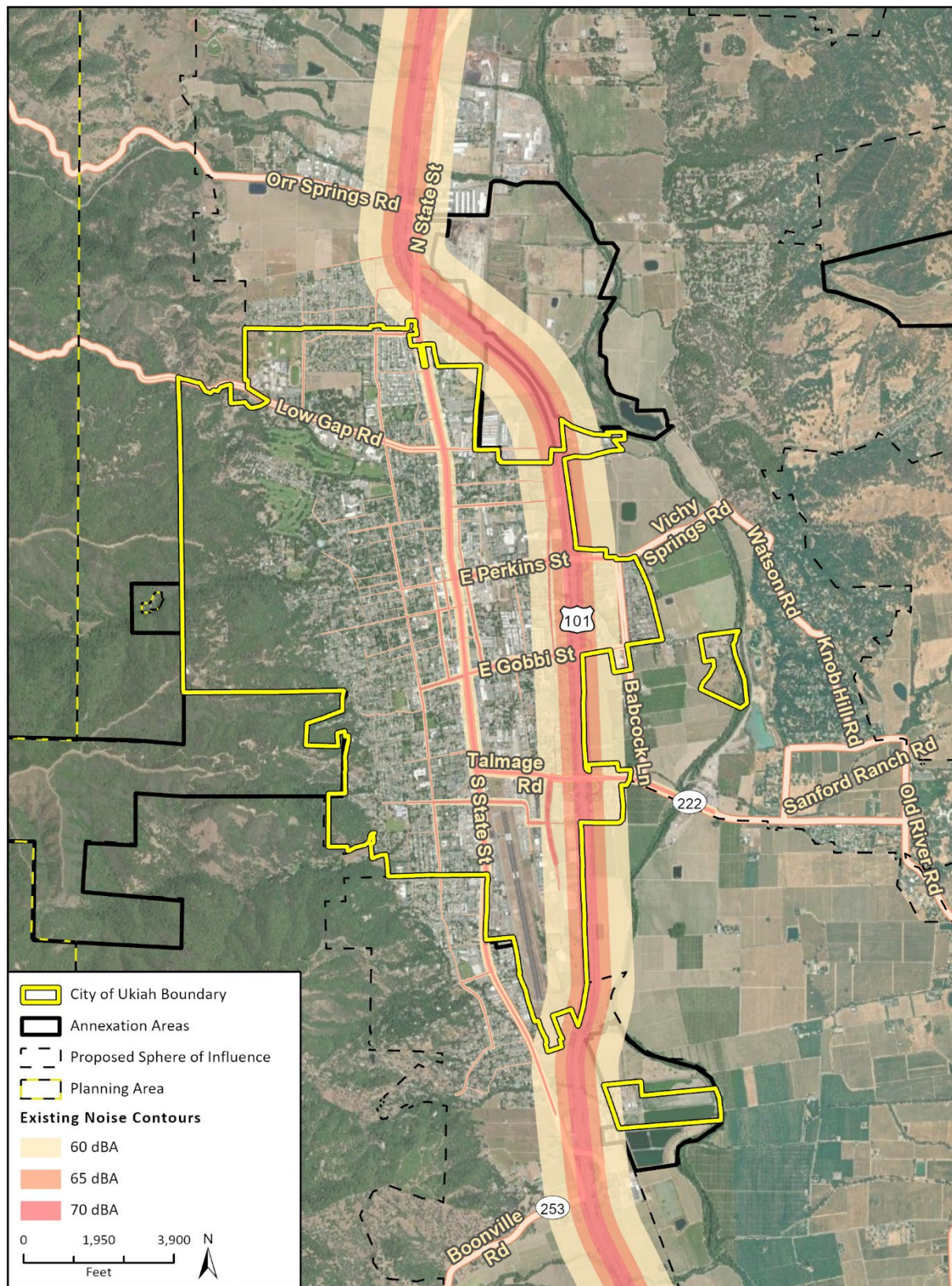
Proposed Policies SAF-8.2 and SAF-8.4 would ensure that noise impacts from development facilitated by the project would be analyzed prior to permitting. Additionally, Policy SAF-8.3 would ensure that appropriate mitigation would be incorporated when necessary. Therefore, noise impacts from operational use of residential-scale HVAC units, industrial equipment, and other stationary noise sources would be reduced by proposed Ukiah 2040 policies, and impacts would be less than significant.

#### *Traffic Noise*

Implementation of Ukiah 2040 could result in additional buildout, which would generate new vehicle trips that could incrementally increase the exposure of land uses along roadways to traffic noise. Figure 4.8-2 and Figure 4.8-3 illustrate the modeled roadways and the contours for 60 dBA CNEL, 65 dBA CNEL, and 70 dBA CNEL for the existing and 2040 scenario. The complete distances to the 70, 65, and 60 dBA CNEL noise contours for roadway segments are included in Appendix C. Table 4.8-5 shows the estimated traffic noise increase along study roadway segments. The traffic noise increase is the difference between the projected future noise level and the existing noise level.



**Figure 4.8-2 Existing Traffic Noise Contours**

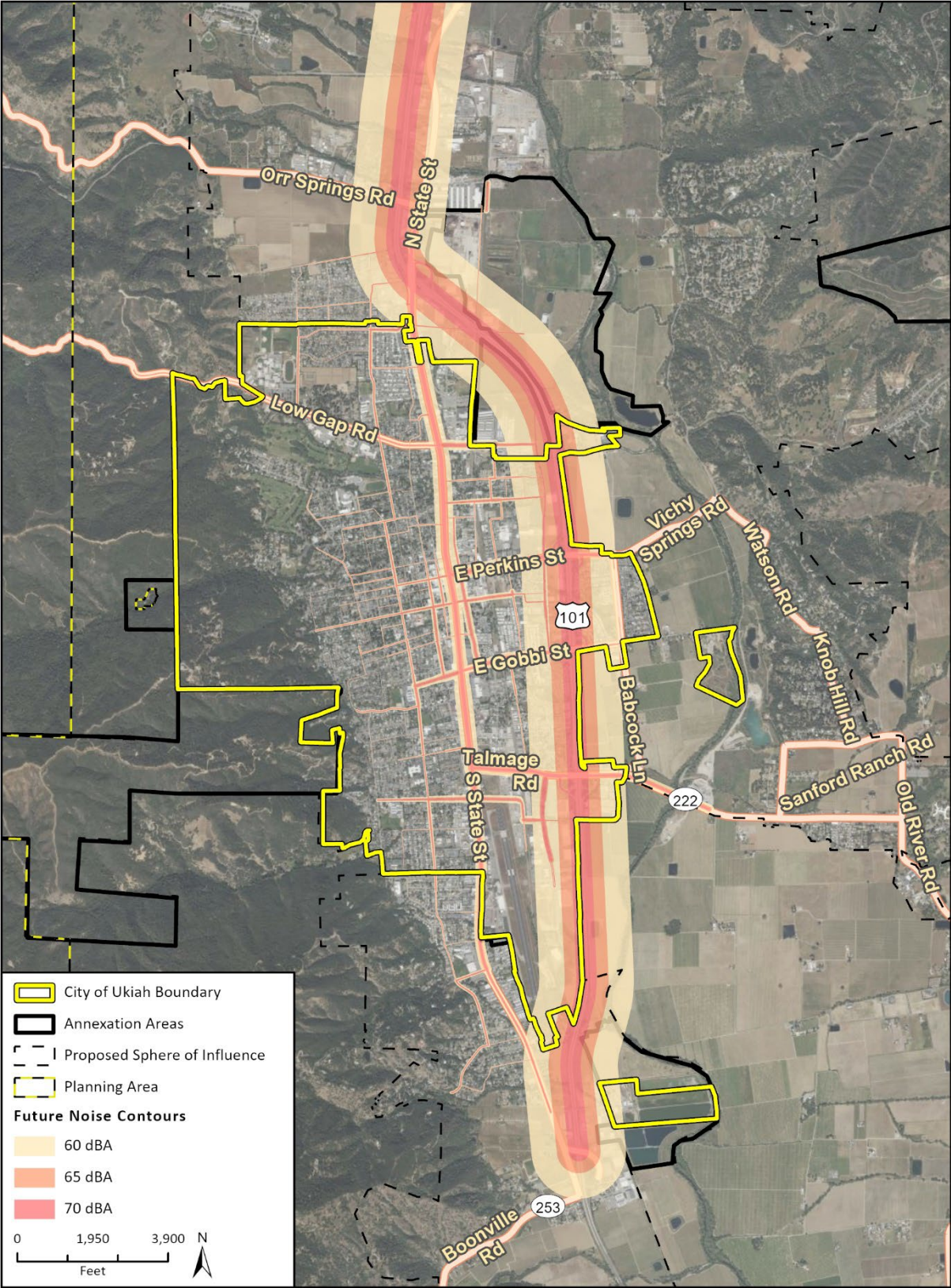


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Noise Contours  
2020 Noise Contours Overview Map



Figure 4.8-3 2040 Traffic Noise Contours



**Table 4.8-5 Traffic Noise Increase Along Study Roadway Segments**

Roadway Segment	Existing ADT	Ukiah 2040 ADT	Existing Traffic Noise Level at 50 feet (dBA CNEL)	2040 Traffic Noise Level at 50 feet (dBA CNEL)	Traffic Noise Increase (dBA CNEL)	Significant? Y/N
State St – N of Low Gap Rd	15,709	18,721	68.9	69.7	0.8	N
State St – Low Gap Rd to Perkins St	18,526	21,334	69.7	70.3	0.6	N
State St – Perkins St to Gobbi St	11,422	13,740	67.6	68.4	0.8	N
State St – Gobbi St to Talmage Rd	17,648	18,537	69.4	69.7	0.2	N
State St – S of Talmage Rd	10,363	10,050	67.1	66.9	-0.1	N
Low Gap Rd – W of State St	3,414	3,882	60.8	61.4	0.6	N
Brush St – E of State St	1,160	8,282	57.6	66.2	<b>8.5</b>	Y
Perkins St – W of State St	2,183	2,338	58.9	59.2	0.3	N
Perkins St – E of State St	14,081	13,730	68.3	68.2	-0.1	N
Gobbi St – W of State St	4,697	5,979	63.6	64.6	1.0	N
Gobbi St – E of State St	10,549	9,861	67.1	66.8	-0.3	N
Talmage Rd – E of State St	10,498	12,125	67.1	67.7	0.6	N

ADT = average daily traffic.

**Bold** = significant increase

Source: GHD 2022

As shown in Table 4.8-5, significant traffic noise increases are estimated along Brush Street east of State Street, which would impact approximately two single family residences. Along all other roadway study segments, traffic noise increases would be less than significant. Along several roadway segments, a decrease in traffic noise levels is anticipated from implementation of Ukiah 2040. In addition, the following Ukiah 2040 proposed goals and policies would limit the impact of traffic on noise impacts.

**Goal SAF-7:** To stabilize or reduce transportation noise impacts on residential uses.

**Policy SAF-7.1:** Noise Inventory. The City shall inventory noise contours for major traffic corridors and the airport.

**Policy SAF-7.2:** Sound Attenuation Strategies. The City shall require all new residential development located along major transportation corridors to incorporate sound attenuation strategies to mitigate noise levels to acceptable levels.

**Policy SAF-7.5:** Roadway Expansion. The City shall require the use of accepted acoustic engineering features when designing for the expansion of existing roads examples include low landscaped berms, landscaping, below-grade construction, and speed control - to minimize expansion of the existing Design to Cost (DTC).

The City considered several mitigation measures to reduce future traffic noise along Brush Street. However, none would be feasible and the traffic noise increase on Brush Street east of State Street, shown in bold in Table 4.8-5, would remain significant and unavoidable.

## Mitigation Measure

### *NOI-1 Construction Noise Reduction Measures*

The following measures to minimize exposure to construction noise shall be included as standard conditions of approval for applicable projects involving construction:

1. **Mufflers.** During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.
2. **Stationary Equipment.** All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers.
3. **Equipment Staging Areas.** Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers.
4. **Smart Back-up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.
5. **Signage.** For the duration of construction, the applicant or contractor shall post a sign in a construction zone that includes contact information for any individual who desires to file a noise complaint.
6. **Temporary Noise Barriers.** Erect temporary noise barriers, where feasible, when construction noise is predicted to exceed the acceptable standards (e.g., 80 dBA  $L_{eq}$  at residential receivers during the daytime) and when the anticipated construction duration is greater than is typical

(e.g., two years or greater). Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. If a sound blanket is used, barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class (STC) 32 or higher.

## Significance After Mitigation

Implementation of Ukiah City Code requirements and Mitigation Measure NOI-1 would reduce construction noise. However, implementation of Mitigation Measure NOI-1 would not ensure that construction noise impacts would be reduced to below the significance threshold of 80 dBA  $L_{eq}$  during the daytime at residential uses. In addition, due to construction projects that could occur simultaneously in the same area and the potential duration of construction activities, construction impacts would conservatively remain significant and unavoidable. It should be noted that the identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level. In addition, operational traffic noise impacts would be significant and unavoidable.

**Threshold 2:** Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

**IMPACT NOI-2 DEVELOPMENT FACILITATED BY THE PROJECT COULD TEMPORARILY GENERATE GROUNDBORNE VIBRATION DURING CONSTRUCTION, POTENTIALLY AFFECTING NEARBY LAND USES. OPERATION OF FUTURE DEVELOPMENT WOULD NOT RESULT IN SUBSTANTIAL VIBRATION OR GROUNDBORNE NOISE. IMPACTS WOULD LESS THAN SIGNIFICANT WITH MITIGATION.**

Construction activities for future development would result in varying degrees of groundborne vibration depending on the equipment and methods employed. As shown in Table 4.8-4, the greatest likely source of vibration during general construction activities would be caused by vibratory rollers, which would create approximately 0.21 in/sec PPV at a distance of 25 feet (FTA 2018). Additionally, as discussed under Impacts NOI-1, it is possible that pile drivers could be used for construction, which would generate approximately 1.518 in/sec PPV at a distance of 25 feet (FTA 2018). The threshold for historic structures is 0.12 in/sec; the threshold is higher for residential buildings at 0.2 in/sec.

Pile driving may be necessary for future development. The use of pile driving equipment is dictated by site soils and the need for secure or deep foundational pilings based on building height or design, and thus cannot be predicted with reasonable certainty at a program-level analysis. As detailed in Section 4.5, *Cultural Resources* historic or cultural resources exist within the City, including buildings that are older than 45 years. These resources would be susceptible to vibration impacts from potential construction activities that involve pile-driving. At distances of 135 feet from fragile structures such as historical resources, 100 feet from non-engineered timber and masonry buildings (e.g., most residential buildings), or 75 feet from engineered concrete and masonry (no plaster), vibration impacts from pile drivers would be potentially significant. Mitigation Measure NOI-2 would be required for future projects that propose using pile driving or a vibratory roller near sensitive receivers, and would require implementation of measures to reduce vibration impacts during construction.

Residential and commercial development facilitated by the project would not involve substantial operational vibration sources because those uses are not significant sources of vibration. However, industrial development in annexation areas may result in increased vibration from stationary sources. Given the distance of the annexation areas from existing or future residential uses, vibration emanating from stationary sources related to industrial uses is not anticipated to generate significant vibration levels at sensitive receivers.

## Mitigation Measure

### *NOI-2 Construction Vibration Control Plan*

Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed FTA architectural damage thresholds (e.g., 0.12 in/sec PPV for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, and static rollers as opposed to vibratory rollers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.

## Significance After Mitigation

Impacts associated with vibration from construction would be reduced to the greatest extent feasible, including avoidance of damaging an historic resource, through implementation of Mitigation Measure NOI-2. Therefore, impacts related to vibration would be reduced to less than significant levels with mitigation.

**Threshold 3:** For a project located within the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels?

**Impact NOI-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SIGNIFICANTLY INCREASED AIRPORT AND AIRSTRIP ACTIVITY, SINCE THE UKIAH MUNICIPAL AIRPORT WOULD NOT SERVE TRAVELERS OR INDUSTRY. THE CONTINUED REGULATION OF AIRPORT NOISE CONSISTENT WITH STATE AND FEDERAL REGULATIONS AS WELL AS THE IMPLEMENTATION OF PROPOSED POLICIES IN UKIAH 2040 AND THE UKIAH MUNICIPAL AIRPORT LAND USE COMPATIBILITY PLAN WOULD MINIMIZE DISTURBANCE TO PEOPLE RESIDING OR WORKING WITHIN PROXIMITY OF THE UKIAH MUNICIPAL AIRPORT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

Residents and businesses facilitated by the project would not be served by the Ukiah Municipal Airport, except for emergency medical and fire services. As such, implementation of Ukiah 2040 would not increase airport activities or airport noise. Existing requirements for airports would reduce the noise impacts of airport activity on residents and workers. Title 21 of the California Code of Regulations establishes noise standards for airports and the responsibilities of the regional

Airport Land Use Commissions, which prepare land use compatibility plans with thorough evaluations of airport noise, as described above in Section 4.8.2, *Regulatory Setting*. Additionally, the Federal Aviation Administrative Regulation Part 150 Airport Noise Compatibility Program is designed to reduce the effect of airport noise on the surrounding communities as airports expand.

Further, individual projects as a result of implementation of Ukiah 2040 would be subject to all development standards for each compatibility zone, and other policies contained within the UKIALUCP intended to reduce land use conflicts with airport operations, as described in the Ukiah Municipal Airport Ukiah Municipal Airport Land Use Compatibility Plan. Such measures are required for the Ukiah Municipal Airport, which are outlined in Section 4.8.2, *Regulatory Setting*.

Lastly, the following proposed Ukiah 2040 policies would reduce noise from Ukiah Municipal Airport through disclosure, attenuation, and studies.

**Policy LU-10.5:** Ukiah Municipal Airport Land Use Compatibility Plan. The City shall require new development within each airport zone that conforms to the height, use and intensity specified in the land use compatibility table of the Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP).

**Policy LU-10.6:** Mendocino County Airport Land Use Commission As required within the UKIALUCP, the City shall refer new development projects in the Ukiah Airport area of influence to the Mendocino ALUC for review and comment.

**Implementation Program F.** Ukiah Municipal Airport Land Use Compatibility Plan. The City shall review every five years and update as necessary the Ukiah Municipal Airport Land Use Compatibility Plan. The review and potential update shall consider changing airport facility and aviation needs, new aircraft types, and new noise and safety standards.

**Policy SAF-7.1:** Noise Inventory. The City shall inventory noise contours for major traffic corridors and the airport.

**Policy SAF-7.3:** Airport Noise Disclosure. The City shall require disclosure of potential airport noise impacts for property transactions located within the 55 to 65 decibel airport noise contours.

**Policy SAF-7.4:** Airport Noise Attenuation. The City shall require the incorporation of sound reducing measures in all new construction in the airport compatibility zones, consistent with the Ukiah Municipal Airport Master Plan.

**Policy SAF7.6:** Noise Equipment. The City shall require that commercial passenger service aircraft comply with the best available noise equipment standards to reduce noise impacts on the ground.

With the aforementioned requirements in place and implementation of proposed Ukiah 2040 policies, airport activity would not expose residents and workers to excessive noise levels, and impacts would be less than significant.

## **Mitigation Measures**

No mitigation measures would be required.

## **Significance After Mitigation**

Impacts would be less than significant without mitigation.

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## 4.9 Population and Housing

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This section summarizes existing and projected population and housing in the City and analyzes the impacts on population and housing due to the project.

### 4.9.1 Setting

#### **a. Population**

The City of Ukiah was incorporated in 1876 but remained relatively small and slow growing until the 1920s. Following the end of World War II, the city grew rapidly (City of Ukiah 2020). Ukiah experienced approximately 19 percent growth from 1970-1980 and 20 percent growth from 1980-1990 (California Department of Finance [DOF] 2022a; DOF 2022b). In the 1990s, the City's population growth slowed to approximately 6 percent (DOF 2022c), and in the 2000s, the growth rate decreased to approximately 4 percent (DOF 2022d). The City then experienced an approximately 1 percent population decrease from 2010 to 2020 (DOF 2022e). From 2020 to 2022, the City's population continued to decrease from 16,604 residents in 2020 to 16,080 residents in 2022, representing a 3 percent decline (DOF 2022f).

#### **b. Households and Dwelling Units**

A household is defined by the DOF and the United States Bureau of the Census (US Census) as a group of people who occupy a housing unit. A household differs from a dwelling unit because the number of dwelling units includes both occupied and vacant dwelling units. Not all the population lives in households; a portion live in group quarters, such as board and care facilities and others are unhoused.

Small households, consisting of one to two persons per household, traditionally reside in units with zero to two bedrooms; family households of three to four persons normally reside in units with three to four bedrooms. Large households of five or more persons typically reside in units with four or more bedrooms. However, the number of units in relation to the household size may also reflect preference and economics. Many small households obtain larger units, and some large households live in small units for economic reasons.

The DOF estimates that approximately 55 percent of Ukiah's housing stock is single-family detached homes, 19 percent is multifamily homes (including apartments and condominiums), 13 percent is two to four unit attached homes, 7 percent is mobile homes, and 6 percent is single-family attached homes (City of Ukiah 2020). Over 90 percent of all housing in Ukiah was built before 1989 or earlier, with 0.3 percent of housing being built during or after 2010. 1970 to 1979 saw the highest increase in Ukiah's housing stock, with approximately 20.8 percent of the City's existing housing constructed during that decade (City of Ukiah 2020). As of 2022, household size in Ukiah is 2.4 persons per household and the City has an estimated 3,765 single detached units; 436 single attached units; 889 two to four unit homes; 1,405 five plus unit homes; and 460 mobile homes; for a total of 6,955 housing units (DOF 2022g).

#### **c. Jobs-Housing Ratio**

Information on the jobs-housing ratio is provided for informational purposes only. The jobs-household ratio in a jurisdiction is an overall indicator of jobs availability within the area. A balance of jobs and housing can give residents an opportunity to work locally and avoid employment



commutes to other places in the region. Ukiah has an estimated 6,708 jobs and a ratio of 0.96 jobs per dwelling unit (City of Ukiah 2022).<sup>1</sup> That amounts to less than one job per household, which means that workers must travel to other communities to find employment. Most households have more than one worker; therefore, a ratio of jobs to housing should be above 1:1 to have a balance of jobs to households.

#### **d. Projections**

Although population growth projections specific to Ukiah are unavailable, the DOF estimates that Mendocino County will grow by 6 percent by 2040, or an average rate of 0.3 percent annually. Between 2010 and 2019, Ukiah grew at a rate of 0.15 percent annually. If the city were to continue to grow at this rate, it would see about just over three percent growth by 2040 (City of Ukiah 2020). Ukiah currently has a population of 16,080. Assuming a 3 percent growth rate to 2040, Ukiah would gain 482 residents for a total population of 16,562 by 2040.

### **4.9.2 Regulatory Setting**

#### **a. Federal Regulations**

There are no federal regulations applicable to population and housing in Ukiah.

#### **b. State Regulations**

##### **State Housing Element Law**

State housing element statutes (Government Code Sections 65580-65589.9) mandate that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. As a result, State housing policy rests largely upon the effective implementation of local general plans and in particular, housing elements.

Section 65583 of the California Government Code requires cities and counties to prepare a housing element, as one of the state-mandated elements of the General Plan, with specific direction on its content. Pursuant to Section 65583(c)(7), the Housing Element must develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households.

Pursuant to California Government Code Section 65583.2(g)(3), the Housing Element is required to include a program to impose housing replacement requirements on certain sites identified in the inventory of sites. Under these requirements, the replacement of units affordable to the same or lower income level, consistent with those requirements set forth in State Density Bonus Law (Government Code Section 65915(c)(3)), would be required.

Pursuant to California Government Code Section 65584(a)(1), the California Department of Housing and Community Development (HCD) is responsible for determining the regional housing needs assessment (segmented by income levels) for each region's planning body known as a "council of governments" (COG), the Mendocino Council of Governments (MCOG) being the COG serving the

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<sup>1</sup> 6,708 jobs / 6.955 dwelling units = 0.96 jobs per dwelling unit

Ukiah Valley region. HCD prepares an initial housing needs assessment and then coordinates with each COG to arrive at the final regional housing needs assessment. To date, there have been five previous housing element update “cycles.” California is now in its sixth “housing-element update cycle.” The MCOG RHNA and the City’s General Plan Housing Element are discussed further below. Additionally, Government Code Section 65588 dictates that housing elements must be updated at least once every five years.

## AB 1763

AB 1763, effective January 1, 2020, amends the State Density Bonus Law (Section 65915) to allow for taller and denser 100 percent affordable housing developments, especially those near transit, through the creation of an enhanced affordable housing density bonus.

## c. Regional and Local Regulations

### Regional Housing Needs Assessment

California’s Housing Element law requires that each county and city develop local housing programs to meet their “fair share” of future housing growth needs for all income groups, as determined by the DOF. The regional COGs are then tasked with distributing the State-projected housing growth need for their region among their city and county jurisdictions by income category. This fair share allocation is referred to as the Regional Housing Needs Assessment (RHNA) process. The RHNA represents the minimum number of housing units each community is required to plan for through a combination of: 1) zoning “adequate sites” at suitable densities to provide affordability; and 2) housing programs to support production of below-market rate units. Table 4.9-1 shows Ukiah’s allocation from the 2019-2027 RHNA distributed among the five income categories.

**Table 4.9-1 Regional Housing Needs Assessment 2019-2027**

Income Group	RHNA Allocation (units) <sup>1</sup>
Very Low: up to 50 percent of area median income	86
Low: between 51 and 80 percent of area median income	72
Moderate: between 81 and 120 percent of area median income	49
Above Moderate	32
<b>Total</b>	<b>239</b>

<sup>1</sup> Source: MCOG 2018a

### Mendocino Council of Governments

Ukiah is located within the MCOG planning area. MCOG functions as the Metropolitan Planning Organization (MPO) for Mendocino County and is responsible for implementing the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). MCOG’s current RTP was adopted in 2018 and serves as a long-range integrated transportation and land-use/housing strategy for Mendocino County (MCOG 2018b). MCOG is currently developing the latest RTP/SCS, called Move 2030, which aims to inform transportation and land use decisions through 2050.

## Ukiah Housing Element

The Housing Element is one of the seven required elements of the General Plan. The purpose of the Housing Element is to identify and analyze existing and projected housing needs to preserve, improve, and develop housing for all economic segments of the community, consistent with the RHNA regulations described above. The City adopted its current Housing Element in 2019 as part of the 2019-2027 planning cycle. This Housing Element was submitted to the HCD for review and comment, and the City received certification of the Housing Element from HCD in 2019. Pertinent goals and policies from the city's 2019-2027 Housing Element include the following:

**Goal H-1:** Conserve, rehabilitate, and improve the existing housing stock to provide adequate, safe, sustainable, and decent housing for all Ukiah residents.

**Goal H-2:** Expand housing opportunities for all economic segments of the community, including special needs populations.

**Policy H-2.2:** Encourage the development of a variety of different types of housing.

**Policy H-2.3:** Ensure that adequate residentially designated land is available to accommodate the City's share of the Regional Housing Need. In order to mitigate the loss of affordable housing units, require new housing developments to replace all affordable housing units lost due to new development.

**Policy H-2.5:** Facilitate the production of housing for all segments of the Ukiah population, including those with special needs.

**Policy H-2.6:** Expand affordable housing opportunities for first time homebuyers.

**Goal H-3:** Remove governmental constraints to infill housing development.

**Goal H-4:** Promote well-planned and designed housing opportunities and projects for all persons, regardless of race, gender, age, sexual orientation, marital status, or national origin.

**Goal H-5:** Provide support for future housing needs.

**Policy H-5.1:** Pursue annexation efforts that lead to an orderly expansion of growth, where services are adequate for future residential development.

### 4.9.3 Impact Analysis

#### a. Significance Thresholds and Methodology

##### Significance Thresholds

Based on Appendix G of the *CEQA Guidelines* a project may be deemed to have a significant impact on population and housing if it would:

1. Induce substantial unplanned population growth in an area either directly or indirectly; or
2. Displace substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere.

For purposes of this analysis, substantial population growth is defined as growth exceeding MCOG or Mendocino County Air Quality Management District population forecasts for Ukiah. Substantial

displacement would occur if implementation of the project would displace more residences than would be accommodated through growth accommodated by Ukiah 2040.

## Methodology

Population and housing trends in the City were evaluated by reviewing the most current data available from the US Census Bureau, the California DOF, the current Ukiah General Plan, MCOG, and the 2019 RHNA. Impacts related to population are generally social or economic in nature. Under CEQA, a social or economic change generally is not considered a significant effect on the environment unless the changes are directly linked to a physical change.

### b. Project Impacts and Mitigation Measures

**Threshold 1:** Would the project induce substantial unplanned population growth in an area, either directly or indirectly?

**Impact POP-1** IMPLEMENTATION OF THE PROJECT WOULD FACILITATE THE CONSTRUCTION OF NEW HOUSING IN UKIAH AND WOULD INCREASE POPULATION GROWTH. HOWEVER, THE PROJECT IS INTENDED TO ACCOMMODATE AND PLAN FOR POPULATION GROWTH AND INCLUDES POLICIES TO MANAGE GROWTH AND DEVELOPMENT. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

This EIR identifies a maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. The following estimate of population growth is a conservative estimate based on the maximum buildout scenario. Development of the project in the maximum buildout scenario is estimated to result in approximately 2,350 additional residential units in the city by the year 2040 (see Section 2, *Project Description*). Assuming 2.4 persons per household, the 2,350 additional residential units could generate approximately 5,640 residents. As described in Section 4.9.1, *Setting*, the City of Ukiah grew at a rate of 0.15 percent annually between 2010 and 2019. Assuming the same growth rate, the City of Ukiah would be expected to gain 482 residents by 2040. Thus, the additional population growth associated with Ukiah 2040 would be approximately 12 times greater than previous population growth trends.

Nonetheless, the population growth associated with the project would not be considered unplanned for several reasons. The State requires that all local governments adequately plan to meet the housing needs of their communities. Given that the State is currently in an ongoing housing crisis due to an insufficient housing supply, the additional units under the project would further assist in addressing the existing crisis and meeting the housing needs of the City's communities.

The increase in affordable housing units would provide housing opportunities in proximity to jobs for those employed in Ukiah that meet these household income categories. Considering the City's low jobs-housing ratio, the provision of affordable housing units would provide opportunities for a better balance of jobs and housing in the region. Goals and policies from the City's 2019-2027 Housing Element, as shown in Section 4.9.2, *Regulatory Setting*, would support equitable housing opportunities.

Furthermore, as discussed in Section 4.9.1, *Setting*, Ukiah has a current jobs-housing ratio of 0.96, which means that workers must travel to other communities to find employment. Growth from Ukiah 2040 would result in a more balanced jobs-housing ratio in 2040 by increasing jobs available

in Ukiah, especially with the new commercial land use designations and incorporation and development of three annexation areas. Therefore, such growth would not result in substantial adverse effects associated with an increased imbalance of jobs and housing in the city.

Finally, one purpose of Ukiah 2040 is to direct future development in such a way to minimize the impacts of growth by emphasizing the intensification and reuse of already developed areas and redevelopment to infill areas, thus minimizing pressure to develop the remaining open space in the city and directing growth. Therefore, because Ukiah 2040 is designed for planned and orderly growth, as mandated by the State, development in accordance with Ukiah 2040 would not indirectly induce growth in the City and Annexation Areas. Impacts would be less than significant.

## Mitigation Measures

No mitigation measures would be required.

## Significance After Mitigation

Impacts would be less than significant without mitigation.

**Threshold 2:** Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

**Impact POP-2 IMPLEMENTATION OF THE PROJECT WOULD NOT RESULT IN THE DISPLACEMENT OF SUBSTANTIAL NUMBERS OF HOUSING OR PEOPLE. THE PROJECT WOULD FACILITATE THE DEVELOPMENT OF NEW HOUSING IN ACCORDANCE WITH STATE AND LOCAL HOUSING REQUIREMENTS, WHILE PRESERVING EXISTING RESIDENTIAL NEIGHBORHOODS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

“Substantial” displacement would occur if allowed land uses would displace more residences than would be accommodated through growth facilitated by the project. The project would accommodate new development because of the increased residential densities and building intensities that would be allowed for the land use designations in Ukiah 2040.

This EIR identifies a maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. In the maximum buildout scenario, the project could result in an additional 2,350 housing units and an additional 4,514,820 non-residential square footage. Ukiah 2040 would enable the development of a combination of housing at low, medium, and high densities. Ukiah 2040 includes the following proposed policies:

**Policy LU-8.3:** Infill Development, The City shall encourage population and employment growth toward infill development sites within the city.

**Policy LU-8.4:** Reuse of Underutilized Property, The City shall encourage property owners to revitalize or redevelop abandoned, obsolete, or underutilized properties to accommodate growth.

**Policy LU-9.3:** Adaptation of Existing Residential Units, The City shall encourage the adaptation of existing residential units to support multi-family use.

Overall, Ukiah 2040 would promote infill development; the redevelopment of abandoned, obsolete, or underutilized properties; and the adaptation of existing residential units to support multi-family

use. These development patterns would minimize displacement. Overall, Ukiah 2040 would provide greater housing options for residents in Ukiah. The additional 2,350 housing units that could be built because of Ukiah 2040 would provide additional housing opportunities for residents, if any are displaced during buildout of the project. Therefore, the project is not anticipated to result in the net loss or displacement of housing, necessitating the construction of replacement housing elsewhere. Impacts would be less than significant.

### **Mitigation Measures**

No mitigation measures would be required.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation.

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## 4.10 Public Services and Recreation

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This section summarizes the public services, including fire and police protection, public schools, and public facilities including parks that serve the Planning Area and analyzes the impacts on public services and recreation due to the project.

### 4.10.1 Setting

#### **a. Fire Services**

The Ukiah Valley Fire Authority (UVFA) provides fire protection and emergency medical response services to approximately 90 square miles in and around Ukiah containing a population of approximately 30,000. UVFA service area contains historic downtown buildings, county governmental buildings, Mendocino Community College, Dharma Realm Buddhist University, a regional hospital, and all residential and commercial developments within Ukiah. UVFA is also responsible for the lower half of Lake Mendocino, including the Coyote Dam, expansive wildland urban interface areas, the Ukiah Municipal Airport, US 101, and State Route 253.

The California Department of Forestry and Fire Protection (Cal Fire) is responsible for fire protection of the forested areas in the hills west of the city. Cal Fire's Mendocino Unit is stationed in Ukiah at 2690 North State Street (Ukiah 2020).

#### **Staffing, Facilities and Equipment**

UVFA is staffed by 19 full-time safety employees (Fire Chief, 3 Division Chiefs, 6 Captains, 6 Engineers and 3 Firefighters), one full-time administrative-clerical employee, and up to 25 dedicated volunteer firefighters, including a Volunteer Division Chief (Ukiah 2020). UVFA maintains four fire stations. Each station is staffed daily with at least two crews consisting of two or more personnel. Available equipment includes Type I Engines that are best suited for structural fires and Type II/III Engines that are best suited for the Wildland Interface.

#### **b. Police Services**

The City of Ukiah Police Department (UPD) provides law enforcement and dispatch services from a single station located at 300 Seminary Avenue. In 2020, UPD authorized 34 sworn personnel (Ukiah 2020). In 2018, UPD made 945 misdemeanor arrests, 427 felony arrests, 125 Driving Under the Influence arrests, and issued 875 traffic citations. In general, UPD handled over 70 calls for service per day. Except for vehicle theft and arson, crimes have been in decline from 2016 to 2018 (Ukiah 2020).

#### **c. Schools**

Both the City of Ukiah and Ukiah Planning Area are served by the Ukiah Unified School District (UUSD), which operates all public schools in the area, including the following:

- Four preschools, three in the city and one in the Planning Area
- Six elementary schools, four in the city and two in the Planning Area
- Two middle schools, one in the city and one in the Planning Area



- Two high schools (Ukiah High School and South Valley High), both in the city
- One adult school (Ukiah Adult School), in the city

In addition to the UUSD schools, there are four private preschools, four charter schools, and a private religious school in the city. There are two higher education institutions in the Planning Area:

- Mendocino College, a community college is north of the city.
- Dharma Realm Buddhist University, which is part of the City of Ten Thousand Buddhas, is in neighboring Talmage.

Prior to March 2020 (beginning of COVID-19 pandemic), UUSD was projecting a slight increase in enrollment for the 2020-21 school year at approximately 6,040 students from preschool to 12<sup>th</sup> grade. However, actual 2020-21 enrollment was lower, at only 5,938 students, with mostly in the primary grades containing fewer students than budgeted. UUSD projects a decrease of approximately 58 students for the 2021-22 school year resulting in an estimated enrollment of 5,938 students across the entire district (Ukiah Unified School District 2021). As of the 2018-19 school year, the student to teacher ratio within for UUSD is roughly 18 students for every one teacher (Education Data Partnership 2022).

#### **d. Parks and Recreation**

According to the California Department of Finance (DOF) Ukiah has a population of 16,080 people (DOF 2021). The City of Ukiah operates approximately 260 acres of parkland, recreational areas, and city facilities that function as community gathering places. Additionally, Mendocino County operates an 80-acre open space park in the city. Considering the parks operated by both the City of Ukiah and Mendocino County, residents of Ukiah have a service ratio of approximately 16.2 acres per 1,000 residents (DOF 2021, Ukiah 2020). A summary of park and recreation areas in Ukiah is provided in Table 4.10-1.

**Table 4.10-1 Parks and Recreation Facilities**

Name	Description
Alex Rorabaugh Recreation Center	The 14-acre Alex Rorabaugh Recreation Center includes a meeting room available to the public and a gymnasium
Alex R. Thomas Plaza	Alex R. Thomas Plaza is a 0.8-acre gathering space with benches, public restrooms, a pavilion, and amphitheater. Facilities are available to rent for the public.
Gardner Park	Gardner Park is a 0.2-acre park with picnic tables.
Giorno Park/Anton Stadium/Lions Field	Giorno Park/Anton Stadium/Lions Field is a 12-acre complex with softball/baseball diamonds and public restrooms.
Rail Trail	Rail Trail provides two miles of easily accessible and safe alternate modes of transportation for bicycle and pedestrian traffic through downtown Ukiah.
Grace Hudson Park "Wild Gardens"	Grace Hudson Park "Wild Gardens" is located just north of the Grace Hudson Museum & Sun House and recently underwent a transformation into an outdoor art and education space. The wild Gardens feature native plant gardens with exhibits and art that educates about the local environment and how Pomo Indians managed this landscape.
Low Gap Park	Low Gap Park is an 80-acre open space park located in the western hills of Ukiah. The park includes a one-acre off-leash dog park, a picnic area with tables and barbecues, tennis courts, an archery range, horseshoe pits, a disc golf course, and public restrooms. Low Gap Park is operated by Mendocino County.

Name	Description
McGarvey Park	McGarvey Park is approximately one acre and features benches.
Oak Manor Park	Oak Manor Park is a four-acre park with playground equipment, picnic tables, barbecues, reservable group areas, and tennis courts.
Oak Street Pocket Park	Oak Street Pocket Park is home of the Veteran's Garden that provides veterans a space to heal and find camaraderie among other veterans along with healthy food. The park is located on the 900 block of Oak Street between Cypress Avenue and Low Gap Road. A walking trail connects pedestrians between Oak and Bush Streets.
Observatory Park	Observatory Park was opened to the public in March 2014. The 2.5-acre park features a historical observatory, walking labyrinth, and Petanque courts. Events within the observatory encourage children and adults to explore space and learn about the solar system. Family- friendly events include Bounce to the Stars, docent tours, and Open Skies for the amateur astronomer to explore the night sky.
Orchard Park	Orchard Park is a 0.25-acre park with playground equipment and picnic tables.
Riverside Park	Riverside Park is a 38-acre open space park featuring open grass areas, picnic tables, benches, walking access to the Russian River, and birding opportunities.
Todd Grove Park	Todd Grove Park is a 16-acre park with playground equipment, picnic tables, barbecues, reservable group areas, and volleyball courts. Located in Todd Grove Park, the Ukiah Municipal Swimming Pools include diving board, concessions, public restrooms, changing rooms, showers, benches, and picnic tables. Swimming facilities are open to the public from early June through mid-August each year.
The Ukiah Civic Center	The Ukiah Civic Center is a 2.5-acre complex with an open space park for recreation or picnicking, benches, and shade areas.
The Ukiah Municipal Golf Course	The Ukiah Municipal Golf Course is a city-owned 152-acre facility with an 18-hole course, pro shop, and snack bar.
The Ukiah Skate Park	The Ukiah Skate Park is a 0.6-acre skate park with public restrooms and benches.
The Ukiah Sports Complex	The Ukiah Sports Complex is a 10-acre site featuring playground equipment, picnic tables, softball/baseball diamonds, public restrooms, and stands. The Sports Complex also hosts youth soccer, ultimate frisbee, and rugby.
The Ukiah Valley Conference Center	The Ukiah Valley Conference Center is a city-owned facility that features meeting rooms, public restrooms, and shops
Vinewood Park	Vinewood Park is a 4.7-acre park featuring playground equipment, picnic tables, barbecues, reservable group areas, and a basketball court.
Source: City of Ukiah 2020	

The City also offers several recreation programs. The City of Ukiah Community Services Department (Parks and Recreation divisions) seeks to involve all ages and interests. The Department offers a variety of classes under topics such as pet training, dance, music, art, and health and fitness. In 2019, Ukiah Parks and Recreation Department offered sports leagues for ping pong, tennis, soccer, baseball, softball, and pickleball. Additionally, the Department takes suggestions from residents and holds specialized classes based on public input. These classes include topics such as Cardiopulmonary resuscitation (CPR) training, babysitting training for teens, life coaching, and women's groups (Ukiah 2020).

## **e. Library Services**

Ukiah's library services are provided by Mendocino County. The Ukiah Branch Library, located at 105 North Main Street, provides public computers, free Wi-Fi, curbside book pickup, printing and copy services, special events, and video game and board games to the residents of Ukiah. In 2021, Mendocino County Library was primarily funded through sale and other taxes (Mendocino County 2021).

## 4.10.2 Regulatory Setting

### **a. Federal Regulations**

There are no federal regulations pertaining to public services that are applicable to this analysis. Applicable State and local regulations are described below.

### **b. State Regulations**

#### **California Fire and Building Code**

The State of California provides minimum standards for building design through the California Building Code (CBC), which is in Part 2 of Title 24, California Building Standards Code, of the California Code of Regulations (CCR). The CBC is based on the International Building Code but has been amended for California conditions. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local building officials for compliance with the CBC. Typical fire safety requirements of the CBC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

#### **California Code of Regulations**

The CCR, Title 5 Education Code, governs all aspects of education within the State. California State Assembly Bill (AB) 2926 – School Facilities Act of 1986 – was enacted by the State of California in 1986 and added to the California Government Code (Section 65995). It authorizes school districts to collect development fees, based on demonstrated need, and generate revenue for school districts for capital acquisitions and improvements. It also established that the maximum fees which may be collected under this, and any other school fee authorization are \$1.50 per square foot (\$1.50/ft<sup>2</sup>) for residential development and \$0.25/ft<sup>2</sup> for commercial and industrial development. AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 et seq. of the Government code. Under this statute, payment of statutory fees by developers serves as total mitigation under CEQA to satisfy the impact of development on school facilities. However, subsequent legislative actions have alternatively expanded and contracted the limits placed on school fees by AB 2926.

#### **California Senate Bill 50**

As part of the further refinement of the legislation enacted under AB 2926, the passage of SB 50 in 1998 defined the Needs Analysis process in government Code Sections 65995.5-65998. Under the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing

school capacity because of development. SB 50 generally provides for a 50/50 State and local school facilities match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether State funding is available; whether the school district is eligible for State funding; and whether the school district meets certain additional criteria involving bonding capacity, year-round schools, and the percentage of moveable classrooms in use.

California Government Code sections 65995-65998 sets forth provisions to implement SB 50. Specifically, in accordance with section 65995(h), the payment of statutory fees is “deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities.” The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Pursuant to Government Code section 65995(i), “A State or local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in section 56021 or 56073 on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized pursuant to this section or pursuant to section 65995.5 or 65995.7, as applicable.”

California Education Code section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.

### **State Public Park Preservation Act (California Public Resource Code Section 5400 – 5409)**

The State Public Park Preservation Act is the primary instrument for protecting and preserving parkland in California. Under the Act, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This ensures a no net loss of parkland and facilities.

### **Quimby Act (California Government Code Section 66477)**

The Quimby Act allows cities and counties to adopt park dedication standards/ordinances requiring developers to set aside land, donate conservation easements, or pay fees towards parkland when property is subdivided.

### **c. Local Regulations**

The City does not currently have certain public services goals, such as a parks to person ratio goal or response time goals for the UVFA and the UPD.

### **Ukiah City Code**

Ukiah City Code Sections 1965 through 2002 identifies parks within the City limits and contains regulations for City parks pertaining to hours of use, camping, fires, parking, trash and refuse, animals, alcohol consumption, music, special events, prohibited uses, etc.

Chapter 1 section 8403 and section 8404 of Ukiah’s City Code outlines the city’s formula to calculate required park land designation for new residential subdivision development and the payment of a development fee in lieu of park land designation, respectively. Any money collected in lieu of park land designation is used for the purpose of providing park or recreational facilities reasonably related to serving the subdivision by way of the purchase of necessary land or, if the City Council deems that there is sufficient land available for the subdivision, for improving such land for park and recreational purposes.

### 4.10.3 Impact Analysis

#### **a. Significance Thresholds and Methodology**

According to Appendix G of the *CEQA Guidelines*, impacts related to public services and recreation from implementation of the project would be significant if it would:

1. 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 objectives for any of the public services:
  - a. Fire protection;
  - b. Police protection;
  - c. Schools;
  - d. Parks; or
  - e. Other public facilities;
2. 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
3. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

In terms of Threshold 1e regarding impacts on “other public facilities,” such facilities include libraries and other public utility infrastructure. Impacts related to libraries are discussed in this section under Impact PS-4. Impacts related to public stormwater facilities are addressed in Section 4.16.4, *Hydrology and Water Quality*, and impacts related to public wastewater, water, and solid waste facilities are discussed in Section 4.13, *Utilities and Service Systems*.

## b. Project Impacts and Mitigation Measures

<b>Threshold 1a:</b>	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?
<b>Threshold 1b:</b>	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

**Impact PSR-1** DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN AN INCREASE TO THE CITY'S POPULATION. THE ESTIMATED POPULATION INCREASE WOULD INCREASE DEMAND FOR FIRE AND POLICE PROTECTION SERVICES AND POTENTIALLY CREATE THE NEED FOR NEW OR ALTERED POLICE, FIRE, OR OTHER SERVICE FACILITIES. THE TIMING, INTENSITY, AND LOCATION OF POTENTIAL NEW FACILITIES IS UNKNOWN AT THIS TIME, BUT NEW DEVELOPMENT WOULD REQUIRE ADDITIONAL CEQA REVIEW AND COMPLIANCE WITH EXISTING BUILDING AND ZONING CODES. UKIAH 2040 POLICIES WOULD ENSURE THAT POLICE AND FIRE SERVICES STAFFING AND FACILITIES ARE MAINTAINED AT A LEVEL WHICH ACCOMMODATES FOR SUSTAINED POPULATION GROWTH. THEREFORE, IMPACTS TO POLICE AND FIRE SERVICES ASSOCIATED WITH UKIAH 2040 WOULD BE LESS THAN SIGNIFICANT.

As a result of annexation, Ukiah 2040 would physically expand the service area of both the UVFA and UPD. Additionally, implementation of the project would result in additional growth. This EIR identifies a maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. The following estimate of population growth is a conservative estimate based on the maximum buildout scenario. The development of approximately 2,350 additional residential units, which is based on the maximum buildout scenario could add approximately 5,640 residents by the year 2040 (see Section 4.9, *Population and Housing*). The UVFA has a current service ratio of 1.2 personnel to 1,000 residents. With the addition of 5,640 residents the service ratio of the UVFA would fall to 0.87 personnel to 1,000 residents. The UPD currently employs 34 authorized sworn personnel and has a current service ratio 2.1 officers to 1,000 residents. With the addition of 5,640 residents the service ratio of the UPD would fall to 1.5 officers to 1,000 residents.

The UPD will continue to coordinate with Mendocino County Sheriff's Office on joint operations and services according to proposed Policy PFS 9.3 of Ukiah 2040, as seen below. Furthermore, the incremental contribution to demand for increased UVFA protection services from implementation of the project would be offset by payment of proportionate property taxes and sales taxes to the City of Ukiah by developers and the addition of new residents. Taxes to the City's General Fund would support the City's budget for protection services. The addition of staffing or purchase of additional equipment would not result in a physical impact on the environment; however, buildout and annexation of the project could result in the need for new or expanded facilities for both the UVFA and UPD.

The following goals and policies from Ukiah 2040 would reduce impacts to police and fire protection:

**Goal PFS-9:** To maintain effective, fast, and dependable fire protection and emergency medical response in Ukiah.

**Policy PFS 9.1:** Emergency Medical Services. The City shall coordinate emergency medical services between agencies servicing the city.

**Policy PFS 9.2:** Fire Prevention. The City shall require all new development to include provisions for onsite fire suppression measures and/or management of surrounding vegetation to provide minimum clearance between structures and vegetation.

**Policy PFS 9.3:** Interagency Coordination. The City shall coordinate with Cal Fire and the Ukiah Valley Fire Authority regarding the fire protection and wildfire safety standards.

**Goal PFS-10:** To provide high-quality public safety and crime reduction services to maintain a safe and secure community.

**Policy PFS-10.1:** Police Staffing. The City shall prioritize the maintenance of Police Department staffing levels in line with community needs.

**Policy PFS-10.2:** Interagency Coordination. The City shall coordinate with the Mendocino County Sheriff's Office on joint operations and services.

**Policy PFS-10.3:** Community Policing Strategies. The City shall promote community policing strategies that strengthen trust and collaboration with the residents of Ukiah, including those of all races, ethnicities, and cultural backgrounds, and ensure public safety through meaningful cooperation and problem-solving techniques.

**Policy PFS-10.4:** School Safety. The City shall collaborate with the Ukiah Unified School District to enhance school security and student, teacher, and administrator safety.

**Policy PFS-10.5:** Public Safety Communications. The City shall use a variety of communication methods (e.g., social media, text messaging, television and radio alerts, website postings) to communicate and inform residents and businesses about crimes, investigations, and emergencies.

The proposed Ukiah 2040 policies, shown above, would ensure that police and fire services staffing and facilities are maintained at a level which accommodates for sustained population growth. Specifically, proposed Policies PSF-10.1 through PSF-10.2 would ensure that the city will prioritize maintaining Police Department staffing levels in line with community needs as the UPD's service area grows as well as promoting coordination with Mendocino County Sheriff's Office. Proposed Policies PFS-9.1 through PFS-9.3 would require on-site fire suppression measures and coordination of emergency services, including Cal Fire to maintain effective, fast, and dependable fire protection and emergency medical response in Ukiah.

Nonetheless, Ukiah 2040 could potentially result in the need for new or expanded facilities for both the UVFA and UPD. Because the scope of this analysis is limited to the existing City limits and Annexation Areas where buildout is anticipated to occur, it is expected that new facilities would be located within infill or previously developed areas. As discussed in Section 4.9, *Population and Housing*, one purpose of Ukiah 2040 is to direct future development in such a way to minimize the impacts of growth by emphasizing the intensification and reuse of already developed areas and redevelopment to infill areas, thus minimizing pressure to develop the remaining open space in the city and directing growth.

Future fire and police facilities could be located within the City's proposed sphere of influence (SOI) or larger Planning Area but would require adherence to all applicable building and zoning codes and additional CEQA review to analyze project and location specific impacts. Overall, it is anticipated that many of the impacts identified in this EIR related to construction of new facilities (e.g., impacts on cultural and biological resources) would also apply to development of new future fire and police facilities. However, it is not possible to identify the specific nature, extent, and significance of physical impacts on the environment that could result from the construction and operation of future fire and police facilities without knowing the size and nature of the facility, or its location. For example, new future fire and police facilities could feasibly be housed in an existing building, which would have much less of a physical impact on the environment than the construction of a new facility. As such, impacts associated with implementation of Ukiah 2040 to police and fire services would be less than significant.

### Mitigation Measures

No additional mitigation measures beyond those identified in the EIR would be required.

### Significance After Mitigation

Impacts would be less than significant.

**Threshold 1c:** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

**Impact PSR-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN AN INCREASE IN POPULATION OF SCHOOL-AGED CHILDREN. POPULATION INCREASE WOULD INCREASE DEMAND FOR SCHOOL SERVICES AND POTENTIALLY CREATE THE NEED FOR NEW SCHOOL FACILITIES. COMPLIANCE WITH UKIAH 2040 POLICIES WOULD REDUCE IMPACTS TO SCHOOL FACILITIES. THE TIMING, INTENSITY, AND LOCATION OF POTENTIAL NEW FACILITIES IS UNKNOWN AT THIS TIME, BUT NEW DEVELOPMENT WOULD REQUIRE ADDITIONAL CEQA REVIEW AND COMPLIANCE WITH EXISTING BUILDING AND ZONING CODES. THEREFORE, IMPACTS TO SCHOOLS ASSOCIATED WITH UKIAH 2040 WOULD BE LESS THAN SIGNIFICANT.**

A student generation rate is not available for the UUSD. However, for the purpose of this analysis, a student generation rate was estimated based on the number of existing school-aged children and the number of existing housing units. The current number of students in Ukiah is 5,909 and there are 6,955 housing units in the city. Therefore, a reasonable student generation rate for the City is 0.85 students per housing unit.<sup>1</sup> This EIR identifies a maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth would be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. The following estimate of additional residences is a conservative estimate based on the maximum buildout scenario. The project could facilitate the development of approximately 2,350 residential units in the maximum buildout scenario. Therefore, assuming full project buildout, the project could add approximately 2,000 new students to Ukiah.<sup>2</sup> These additional students would increase enrollment in schools in the

<sup>1</sup> Calculation: 5,909 students / 6,955 housing units = 0.85 students per housing unit

<sup>2</sup> Calculation: 0.85 students per housing unit \* 2,350 new housing units = 1,997 students or approximately 2,000 new students



City of Ukiah and Annexation Areas potentially requiring the construction of new or expansion of existing school facilities.

The Public Facilities and Services Element of the Ukiah 2040 includes proposed goals and policies specific to education and providing school facilities for the City. Relevant goals and policies are listed below.

**Goal PFS-13:** To ensure high-quality educational institutions for all community members that foster diversity and educational attainment.

**Policy PFS-13.1:** Consideration of Impacts. The City shall consider potential impacts on the Ukiah Unified School District during the review of new development projects.

**Policy PFS-13.2:** Planning for Future Growth. The City shall collaborate with Ukiah Unified School District in its long-range planning efforts to ensure the adequacy of school facilities to serve new development.

**Policy PFS-13.3:** School Siting Coordination. The City shall coordinate with Ukiah Unified School District on the future location of schools in relation to transportation and land use plans and seek to avoid traffic impacts and facilitate joint use of community parks and other public facilities by schools.

As discussed in Section 4.9, *Population and Housing*, one purpose of Ukiah 2040 is to direct future development in such a way to minimize the impacts of growth by emphasizing the intensification and reuse of already developed areas and redevelopment to infill areas, thus minimizing pressure to develop the remaining open space in the city and directing growth.

Like the discussion regarding police and fire services facilities described above, future new school facilities could be located within the City's proposed SOI or larger Planning Area. However, it is not possible to identify the specific nature, extent, and significance of physical impacts on the environment that could result from the construction and operation of future school facilities without knowing the size and nature of the facility, or its location. It is anticipated that construction of new facilities would result in similar physical impacts discussed throughout this EIR, but impacts could also be reduced depending on location and intensity. For example, schools could be expanded, which would have much less of a physical impact on the environment than the construction of a new facility. New facilities would require adherence to all applicable building and zoning codes, and additional CEQA review to analyze project and location specific impacts. Lastly, proposed policies in Ukiah 2040 would ensure that the City and UUSD coordinate on long range planning efforts for future growth. As such, impacts to school facilities from implementation of Ukiah 2040 would be less than significant.

## **Mitigation Measures**

No additional mitigation measures beyond those identified in the EIR would be required.

## **Significance After Mitigation**

Impacts would be less than significant.

<b>Threshold 1d:</b>	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?
<b>Threshold 2:</b>	Would the project 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?
<b>Threshold 3:</b>	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

**Impact PSR-3** DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN AN INCREASE TO POPULATION, WHICH COULD INCREASE THE USE OF EXISTING PARKS AND RECREATIONAL FACILITIES, AND THUS REDUCE THE CITY'S PARKLAND TO POPULATION RATIO. HOWEVER, UKIAH 2040 POLICIES WOULD ALSO RESULT IN ADDITIONAL RECREATIONAL FACILITIES. THE TIMING, INTENSITY, AND LOCATION OF POTENTIAL NEW FACILITIES IS UNKNOWN AT THIS TIME, BUT NEW DEVELOPMENT WOULD REQUIRE ADDITIONAL CEQA REVIEW AND COMPLIANCE WITH EXISTING BUILDING AND ZONING CODES. THEREFORE, IMPACTS TO PARK FACILITIES ASSOCIATED WITH UKIAH 2040 WOULD BE LESS THAN SIGNIFICANT.

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The City of Ukiah has a ratio of 16.2 acres of parks per 1,000 residents (DOF 2019, Ukiah 2020). This EIR identifies a maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. The following estimate of population growth is a conservative estimate based on the maximum buildout scenario. The project could add up to 5,640 persons to Ukiah's population in the maximum buildout scenario. With implementation of the project, the City of Ukiah would have a ratio of approximately 12 acres of park land per 1,000 residents. However, Ukiah 2040 would also result in additional recreation opportunities for residents in and around Ukiah.

As described in section 2, *Project Description*, a guiding principle for Ukiah 2040 is the preservation of existing open space resources while enhancing accessibility to parks and recreational amenities. The Environment and Sustainability Element and the Public Facilities, Services, and Infrastructure Element of Ukiah 2040 includes proposed goals and policies specific to maintaining park and recreational facilities. Relevant goals and policies are listed below.

**Goal PFS-11:** To ensure adequate community facilities.

**Policy PFS- 11.1:** Adequate Community Facilities. The City shall develop or identify adequate and appropriate community facilities for public meetings and cultural activities.

**Policy PFS- 11.2:** Joint-Use Facilities. The City shall partner with Mendocino County and the Ukiah Unified School District to provide joint-use facilities.

**Goal PFS-12:** To provide parks, recreational facilities, and trails for residents and visitors.

**Policy PFS-12.1:** Connected Park System. The City shall provide an interconnected park system that creates an urban greenbelt and links all trail systems within the City.

**Policy PFS-12.2:** Expansion of Recreational Amenities and Programs. The City shall expand amenities and recreational programs in parks and recreational facilities that accommodate a variety of ages and address the needs of families.

**Policy PFS-12.3:** Equitable Access to Parks and Recreation Facilities. The City shall establish new parks and recreation facilities to ensure all residents have access within a one-mile radius of their place of residence regardless of socio-economic status.

**Policy PFS-12.4:** Access for Persons with Disabilities. The City shall design all parks and recreation facilities to have adequate access for those with accessibility issues.

**Policy PFS-12.5:** Park Visibility. The City shall assure that all parks are visible from the public right-of-way when possible and remain clear of visual obstructions that reduce visual connections for safety concerns.

**Policy PFS-12.6:** Park Safety. The City Police Department shall patrol and secure parks and recreational facilities from potential crime and misuse.

**Policy PFS-12.7:** Great Redwood Trail – Ukiah. The City shall support the continued phased development of the Great Redwood Trail through and beyond the city limits, to connect adjoining regional trail networks.

**Policy PFS-12.8:** Collaborative Partnerships for Improved Services. The City shall work with Mendocino County, Ukiah schools, and other large land or facility owners to establish and maintain partnerships to improve access and maintenance to parks and recreation.

**Goal ENV-1:** Preserve open space land for the commercial agricultural and productive uses, the protection and use of natural resources, the enjoyment of scenic beauty and recreation, protection of tribal resources, and the protection from natural hazards. (Source: New Goal)

**Policy ENV- 1.1:** Landscaping Compatibility. The City shall require landscaping in new development to be compatible with preservation and restoration goals of open space management and native vegetation.

**Policy ENV-1.2:** Open Space Management. The City shall manage and maintain City-owned open spaces to preserve the integrity of these public spaces.

**Goal ENV-4:** To conserve and protect the city's natural woodlands and water resources for future generations.

**Policy ENV- 4.1:** Habitat Preservation. The City shall require new development to preserve and enhance natural areas that serve, or may potentially serve, as habitat for special-status species. Where preservation is not feasible, the City shall require appropriate mitigation

**Policy ENV- 4.2:** Trail Connectivity. The City shall identify appropriate areas for trails along the ridge line that can be connected to trails in the valley.

**Policy ENV- 4.3:** Interconnected Greenways. The City shall require new development to incorporate and facilitate interconnected greenways that support wildlife conservation and recreational purposes.

**Policy ENV- 4.4:** River and Creek Preservation. The City shall work cooperatively with the County and private landowners to develop pedestrian access along creeks flowing through the City where safe and feasible to do so and where it will not cause adverse impacts.

Implementation of Ukiah 2040 would result in an increase in population, which could increase the use of existing neighborhood and regional parks, in addition to the need for new facilities. Users of existing facilities would be required to adhere to all rules and regulations associated with parks, as regulated in Ukiah City Code Sections 1965 through 2002.

Compliance with proposed goals and policies in Ukiah 2040 would potentially result in development of new recreational opportunities including parks. Future new park facilities could be located within the City limits, proposed SOI, or larger Planning Area. However, it is not possible to identify the specific nature, extent, and significance of physical impacts on the environment that could result from the construction and operation of future park facilities without knowing the size and nature of the facility, or its location. New park facilities would require adherence to all applicable building and zoning codes, and additional CEQA review to analyze project and location specific impacts. In addition, the Ukiah City Code regulates provision of parkland concurrently with new development of residential subdivisions, which would reduce impacts. For the aforementioned reasons, impacts to park and recreation facilities as a result of implementation of Ukiah 2040 would be less than significant.

### **Mitigation Measures**

No additional mitigation measures beyond those identified in the EIR would be required.

### **Significance After Mitigation**

Impacts would be less than significant.

**Threshold 1e:** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

**Impact PSR-4      DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN AN INCREASE TO POPULATION, WHICH COULD INCREASE DEMAND FOR EXISTING PUBLIC FACILITIES SUCH AS LIBRARIES. THE TIMING, INTENSITY, AND LOCATION OF POTENTIAL NEW FACILITIES IS UNKNOWN AT THIS TIME, BUT NEW DEVELOPMENT WOULD REQUIRE ADDITIONAL CEQA REVIEW AND COMPLIANCE WITH EXISTING BUILDING AND ZONING CODES. THEREFORE, IMPACTS TO LIBRARIES ASSOCIATED WITH UKIAH 2040 WOULD BE LESS THAN SIGNIFICANT.**

Population increases from the project could result in increased demand for public services such as libraries. The additional demand could require the construction of new library facilities or expansion of existing library facilities. Consistent with the discussion of impacts on police fire and school facilities above, because future library facilities would be located within City limits, the City's proposed SOI, or Planning Area, many of the impacts identified in this EIR would also apply to future library facilities. Generally, library facilities would be allowed or permitted in areas containing Public land use designations. However, it is not possible to identify the specific nature, extent, and significance of physical impacts on the environment that could result from the construction and operation of a future library facility without knowing the size and nature of the facility, or its location. Regardless, new library facilities would require adherence to all applicable building and zoning codes, and additional CEQA review to analyze project and location specific impacts. Impacts to libraries from implementation of Ukiah 2040 would be less than significant.

### **Mitigation Measures**

No additional mitigation measures beyond those identified in the EIR would be required.

## **Significance After Mitigation**

Impacts would be less than significant.

## 4.11 Transportation

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This section summarizes the transportation network that serves the Planning Area and analyzes the transportation impacts due to the project.

### 4.11.1 Setting

#### **a. Streets and Highways**

The transportation network serving the Planning Area includes a network of city and county-maintained streets and state highways. There are approximately 55 miles of streets owned and maintained by the City of Ukiah. U.S. Highway 101 is a major state highway serving Ukiah that provides regional and statewide connections. The Northwestern Pacific Railroad (NWP) right-of-way and Highway 101 run parallel to the Russian River throughout the Ukiah Valley. Ukiah is a relatively old California city, and early development occurred in a typical grid pattern in the center. The connections between these roadway systems play an integral role in connecting the City of Ukiah to unincorporated areas of the Ukiah Valley, the greater Mendocino County region, and additional regional destinations outside of Ukiah and Mendocino County.

#### **Downtown Streetscape Improvement Project**

Phase 1 of the Downtown Streetscape Improvement Project was completed by the City's Department of Public Works and its contractors in August 2021. Phase I included a "road diet" and streetscape improvements in Downtown Ukiah. The intent of the project is to transform Downtown Ukiah into a more pedestrian-oriented environment and an active location for business, recreation, and shopping while also enhancing the Downtown area for all users, including motorists, pedestrians, and bicyclists. The project includes a road diet between Henry Street and Mill Street, and it transformed the previously existing four-lane cross section into a three-lane cross section with one travel lane in each direction and a two way left-turn lane in the center, with on-street parking. In addition to the road diet, signal modifications were made at each of the three signalized intersections (Standley Street, Perkins Street, and Mill Street) to provide vehicle detection, improve coordination, and re-orient the signal equipment to support the road diet alignment. Streetscape improvements on State Street, Perkins Street, and Standley Street included sidewalk widening, curb ramps and bulb outs, street lights, street furniture, and tree planting (City of Ukiah 2022a). Phase 2 is currently being designed for portions of South State Street (Mill Street to Gobbi Street and Henry Street to Norton Street).

#### **b. Existing Pedestrian and Bicycle Facilities**

Ukiah has an extensive sidewalk network, specifically through the Downtown and surrounding areas, which provide an environment that encourages walking. However, historically, barriers to walking trips exist, including wide crossing distances, a lack of adequate pedestrian facilities on intermittent sections of State Street, and various gaps in sidewalks throughout the City.

However, as noted above, Phase 1 of the Downtown Streetscape Improvement Project included widening sidewalks along State Street in the Downtown area to allow for better pedestrian access, improved handicap accessibility, and more outdoor dining and street furniture. Additionally, the project included bulbouts and enhanced crosswalks intended to make it easier and safer for

pedestrians to get across State Street by lessening the distance and time required to cross and improving pedestrian visibility. Phase 2 is currently being designed for portion of South State Street.

Additionally, the City of Ukiah has constructed three segments of the “Great Redwood Trail,” a 320-mile multi-use trail in a former railroad right-of-way that will eventually connect San Francisco and Humboldt bays. The trail runs north to south through central Ukiah for approximately 0.8 miles and provides bike and pedestrian access along three segments or “phases” for its users (City of Ukiah 2022b). Phase 1 spans the center of Ukiah. Phase 2 extended the trail from Gobbi Street south to Commerce Drive and includes a bridge crossing of Doolin Creek. Phase 3 extended the trail from Clara Avenue north to Brush Street and includes a bridge crossing over Orr Creek. Funding is being sought for an additional phase to complete the trail to the south boundary of the city limits.

Dedicated bicycle facilities in Ukiah include approximately 2 miles of shared-use paths and approximately 8 miles of on-street bicycle lanes, including segments of Bush, Dora, Orchard and Gobi Streets. However, many areas of the City have no designated bicycle facilities since most street segments lack bicycle lanes or bicycle treatments. The bicycling community, ranging from experienced club riders to school children, has developed their own system of streets and routes which provide connectivity and safety for their purposes. For example, bicyclists ride on east-west streets such as Washington Avenue, Mill Street, and Empire Drive despite the absence of bicycle lanes.

### **c. Transit Services**

Public transportation in Ukiah is provided by the Mendocino Transit Authority (MTA). MTA jurisdiction is sanctioned by a 1976 Joint Powers Authority (JPA) agreement between the County of Mendocino and its four incorporated cities: Fort Bragg, Point Arena, Willits, and Ukiah. MTA’s service area covers 2,800 square miles and provides local fixed-route and dial-a-ride services as well as long distance and commute-oriented programs. MTA primarily operates different fixed routes connecting the Mendocino Coast, as well as inland valleys, towns, and communities to Ukiah. Routes 65 and 95 are the two largest routes serving the MTA service area. These routes connect to the coast; operate every day of the year, including most holidays; and provide continuous service for both inland valley and coastal residents.

### **d. Aviation**

Ukiah Municipal Airport is a public use General Aviation facility that serves the Ukiah Valley. The City has owned and operated the airport since the 1930s. In 1942, the airport was established as an auxiliary military landing strip. The airport runway was lengthened to 4,423 feet in 1954. In 1968, the runway was relocated 585 feet south, at its current location.

## **4.11.2 Regulatory Setting**

### **a. Federal Regulations**

#### **Americans with Disabilities Act of 1990**

The Americans with Disabilities Act (ADA) of 1990 provides comprehensive rights and protections to individuals with disabilities. The goal of the ADA is to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities. To implement this goal, the United States Access Board, an independent Federal agency created in 1973 to ensure accessibility for people with disabilities, has created accessibility guidelines for

public rights-of-way. While these guidelines have not been formally adopted, they have been widely followed by jurisdictions and agencies nationwide in the last decade. The guidelines, last revised in July 2011, address various issues, including roadway design practices, slope and terrain issues, pedestrian access to streets, sidewalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way. The guidelines apply to all proposed roadways in the Planning Area.

## **Federal Highway Administration**

The Federal Highway Administration (FHWA) is the agency of the U.S. Department of Transportation (DOT) responsible for the federally funded roadway system, including the interstate highway network and portions of the primary state highway network. FHWA funding is provided through the Moving Ahead for Progress in the 21st Century Act (MAP-21). MAP-21 can be used to fund local transportation improvement projects, such as projects to improve the efficiency of existing roadways, traffic signal coordination, bikeways, and transit system upgrades.

## **b. State Regulations**

### **Circulation Element**

California law mandates the development of a Circulation Element as part of General Plans (often titled as the “Transportation Element” or “Mobility Element”). The Circulation Element must contain the “general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, any military airports and ports, and other local public utilities and facilities,” all correlated with the land use element of the General Plan per Government Code Section 65302 (b). In addition, the General Plan must incorporate “Complete Streets” policies, as described below.

### **Caltrans**

The California Department of Transportation (Caltrans) is responsible for planning, designing, constructing, and maintaining all state highways. The jurisdictional interest of Caltrans includes state highways and facilities, and extends to improvements to roadways at the interchange ramps serving area freeways. Any federally funded transportation improvements would be subject to review by Caltrans staff and the California Transportation Commission.

### **Capital Improvement Programs**

California Government Code Section 65401 specifies that public works projects must be in conformity with the General Plan. In practice, this requires that the City, during each adoption of the Five-Year Capital Improvement Program (CIP), make findings that the proposed City of Ukiah Five-Year CIP is in conformance with the General Plan, including the Mobility Element.

### **Complete Streets Act**

The California Complete Streets Act (AB 1358) adopted in 2008, requires that cities and other public agencies incorporate “Complete Street” policies when updating their General Plan Circulation Element. The term “Complete Streets” refers to a balanced, multimodal transportation network that meets the needs of all users of streets -- including bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, public transportation, and seniors. A “Complete Street” is one that provides safe and convenient travel in a manner that is suitable to the local context. Complete Streets make travel safe for all users, including bicyclists, pedestrians,



motorists, transit vehicles, and people of all ages and abilities. Each street does not need to provide dedicated space to all users, but the network must accommodate the needs of all users.

### **Senate Bill 743**

California Senate Bill 743 (SB 743), passed in 2013, addresses a range of topics and aims to better promote statewide policies that (a) combat climate change by reducing greenhouse gas emissions and particulates; (b) encourage infill development and a diversity of uses instead of sprawl; and (c) promote multi-modal transportation networks, providing clean, efficient access to destinations and improving public health through active transportation.

SB 743 changed the way transportation impact analyses are conducted as part of CEQA compliance. These changes eliminated automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA. Prior rules treated automobile delay and congestion as an environmental impact. SB 743 required the *CEQA Guidelines* to prescribe an analysis that better accounts for transit and reducing greenhouse gas emissions. In December 2018, Office of Planning and Research (OPR) released the final update to *CEQA Guidelines* consistent with SB 743 that went into effect statewide on July 1, 2020, which state that vehicle miles traveled (VMT) is “generally” the most appropriate metric of transportation impacts to align local environmental review under CEQA with California’s long-term greenhouse gas emissions reduction goals. At the same time as the release of the updated *CEQA Guidelines*, OPR also released a non-binding *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which outlines potential VMT analysis methodologies and thresholds of significance for use by agencies in California based on substantial evidence developed by OPR related to achievement of the State’s greenhouse gas emissions reductions targets (OPR 2018).

Although OPR provides recommendations for adopting new impact analysis guidelines, lead agencies have the final say in designing their methodology, provided that the selected analysis methodology aligns with the SB 743 goals to promote infill development, reduce greenhouse gases, and reduce VMT. The City’s approved methodology and thresholds for transportation impacts consistent with SB 743 are described in Section 4.11.3, *Impact Analysis*.

### **c. Local Regulations**

#### **Mendocino County Regional Transportation Plan & Active Transportation Plan**

The Regional Transportation Plan and Active Transportation Plan (RTP/ATP) is a transportation planning document prepared by the Mendocino Council of Governments (MCOG). MCOG adopted the current RTP/ATP in February 2022 (MCOG 2022). The RTP/ATP plan area consists of all of Mendocino County, including the four incorporated cities (Ukiah, Fort Bragg, Willits, and Point Arena), as well as the unincorporated areas of the County. The U.S. Census Bureau estimated a total population of 86,749 for Mendocino County in 2019 (MCOG 2022).

MCOG was first established as a joint powers agency in 1972, as mandated by the Transportation Development Act. The Council primarily serves as the regional transportation planning agency (RTPA) for the region, and consists of seven members—two county supervisors, a countywide representative appointed by the Board of Supervisors, and one council member from each of the four incorporated cities (Ukiah, Willits, Fort Bragg and Point Arena). To be eligible for federal and state funding, transportation projects must be consistent with the adopted RTP. In preparing the RTP/ATP, MCOG coordinated with the public and staff from Caltrans, the Mendocino County Department of Transportation, the Mendocino County Department of Planning and Building

Services, the City of Ukiah, City of Willits, City of Fort Bragg, and City of Point Arena. Other agencies such as the Mendocino Transit Authority (MTA), North Coast Railroad Authority, Mendocino Railway, the Noyo Harbor District, Air Quality Management District, several airports that serve the region, and Walk & Bike Mendocino were also contacted in preparation of the RTP/ATP.

The RTP/ATP provides an overview of both short- and long-term transportation goals, objectives and policies for the region, as well as a list of potential projects intended for implementation. The RTP/ATP considers all modes of transportation including automobile, trucking, bicycle, pedestrian, air, public transit, rail, maritime, and any related facilities needed for an effective transportation system. The Plan also assesses current and long-range transportation issues, identifies needs and deficiencies, considers funding options and suggests actions to address these items, in an effort to improve the overall transportation system in the region. While it is intended to guide transportation decision making over a 20-year planning horizon, it does not necessarily require that projects recommended in the document become implemented. Such decisions are instead made by jurisdictional authorities with discretionary control over subject facilities such as Caltrans, local streets and roads departments, or regional tribal leaders. Decisions are based on a variety of factors specific to local or regional needs (e.g., budgetary constraints, local priorities, environmental considerations, etc.).

As noted in the RTP/ATP, the present status of non-motorized transportation facilities in Mendocino County is piece-meal and incomplete. Local agencies are currently working together to develop projects that encourage the use of alternative routes and facilities that provide safe access for bicyclists and pedestrians throughout the region. The RTP/ATP states that bikeways, pedestrian paths, and multi-modal trails are valuable tools to encourage the use of alternative transportation to improve air quality, relieve localized traffic congestion, reduce VMT, and enhance the role of tourism in the regional economy. As noted above in Section 4.11.1, *Setting*, the City has implemented Phase 1 of the Downtown Streetscape Improvement Project and completed three sections of the Great Redwood Trail to increase pedestrian safety and multi-modal opportunities, and is currently pursuing additional opportunities to expand pedestrian-related facilities.

In 2019-2020, MCOG completed a Fire Vulnerability Assessment and Emergency Evacuation Preparedness Plan for the County to better prepare for wildfire emergencies that are likely to continue because of climate change. The RTP/ATP stated that additional assessments may be needed to adequately assess the vulnerability of local transportation systems and identify adaptation measures.

The RTP/ATP emphasizes a strategy of investing transportation funds to bring greater mobility and access to services for all residents – including pedestrians, bicyclists, transit passengers of all ages and abilities, as well as drivers and passengers in trucks, buses, and automobiles. Among other things, this strategy aims to reduce greenhouse gas emissions and household expenses by reducing VMT. Key policies contained in the RTP/ATP include the following:

- Policy CCE 2.1. Evaluate transportation projects based on their ability to reduce Mendocino County's transportation-related greenhouse gas emissions, and reduce vehicle miles traveled.
- Policy CCE 2.2. Prioritize transportation projects which lead to reduced greenhouse gas emissions and reduced vehicle miles traveled, and prioritize projects that can mitigate for VMT increasing projects.

The RTP/ATP also provides a forecast of Year 2030 home-based VMT per resident by jurisdiction within Mendocino County, as summarized on Table 4.11-1. As shown, Ukiah's rate of home-based

VMT per resident is 10.2 miles per resident, less than half of the regional average of 21.6 miles for Mendocino County. Ukiah's lower rate of home-based VMT per resident reflects the greater proximity of Ukiah residents to adjacent jobs in Ukiah, which reduces daily travel.

**Table 4.11-1 MCOG 2030 Forecast of Home-based VMT per Resident**

Subregion	Residents	Jobs	Home-based VMT	Home-based VMT per Resident
Ukiah	16,063	12,863	163,574	10.2
Ukiah adjacent	19,429	10,040	334,851	17.2
Willits	5,771	4,359	50,712	8.8
Willits adjacent	6,925	265	255,908	37.0
Fort Bragg	8,424	6,000	56,078	6.7
Fort Bragg adjacent	8,187	1,666	134,935	16.5
Point Arena	501	330	10,553	21.0
Other coastal	9,066	3,431	291,321	32.1
Other US 101 corridor	12,084	2,295	368,455	30.5
Other unincorporated	13,360	2,855	486,502	36.4
<b>Regional total (MCOG model area)</b>	<b>99,810</b>	<b>44,103</b>	<b>2,152,888</b>	<b>21.6</b>

<sup>1</sup> VMT per service population or resident is expressed as a generation rate and not a ratio. For example, VMT per resident is how much VMT is generated by the residents of a location. It does not include VMT on the model roadway network that is generated by other sources such as external trips that do not stop in the County.

Source: MCOG 2022 (Page 12, Table 2)

## Ukiah Bicycle and Pedestrian Master Plan

The City of Ukiah Bicycle and Pedestrian Master Plan (BPMP) was most recently updated in 2015. The goal of the BPMP is to improve bicycling and walking in Ukiah as a comfortable and convenient transportation and recreation option. The BPMP identifies a proposed bikeway network that would include approximately 9.25 miles of additional bikeways, including Class I bicycle paths, Class II bicycle lanes (including buffered bike lane segments), and Class III bicycle routes. The BPMP also recommends the provision of additional bicycle parking by the City and private developers. The BPMP identifies the following pedestrian network improvement types:

- The BPMP Pedestrian Corridor Network identifies a corridor network intended to provide a distinguished pedestrian friendly network.
- Major Infrastructure Improvements identify locations for sidewalk installation, paths, curb reconstruction, and pedestrian scale lighting.
- Intersection and Crossing Improvements identify specific locations for focused improvements including curb ramps, curb extensions, crosswalks, and other pedestrian related improvements.
- Studies identify potential improvements for consideration and further analysis.

## Great Redwood Trail-Ukiah Linear Park Master Plan

In June 2020, what previously had been known as "The Rail Trail" was officially designated a park by the Ukiah City Council and renamed The Great Redwood Trail – Ukiah (GRT-Ukiah). The Great Redwood Trail – Ukiah (GRT- Ukiah) is a unique 1.8-mile-long linear park, roughly 40 to 100 feet wide. With the new designation in place, the City of Ukiah, working with Walk & Bike Mendocino,

began the process of developing a Master Plan for the GRT- Ukiah. The Master Plan serves as a guiding document for the park and help determine the current and future needs of the GRT- Ukiah. As funding becomes available, the Master Plan will also help determine what facilities and ancillary amenities are added as the park develops (City of Ukiah 2020).

### **Ukiah Municipal Airport Land Use Compatibility Plan**

The Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP) was adopted by the Mendocino County Airport Land Use Commission on May 20, 2021. On July 7, 2021, the Ukiah City Council adopted Ordinance 1215, requiring all future land use plans, zoning, and districting plans to comply with the UKIALUCP, including Ukiah 2040. The UKIALUCP includes protection for a future 5,000-foot runway to accommodate operations by California Department of Forestry and Fire Protection Lockheed C-130 fire attack aircraft, and was based on a 20-year forecast of 30,916 annual operations, representative of the airport's current condition and potential growth.

### **4.11.3 Impact Analysis**

#### **a. Significance Thresholds and Methodology**

##### **Significance Thresholds**

According to Appendix G of the *CEQA Guidelines*, impacts related to transportation from implementation of the project would be significant if it would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
2. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment); or
4. Result in inadequate emergency access

##### **Methodology**

The methodology for assessing impacts under thresholds 1, 3 and 4 is qualitative in nature and considers the existing regulations in place that would minimize potential impacts related to transit, roadway, bicycle and pedestrian facilities; geometric design features; and emergency access.

Impact TRA-2 evaluates whether the project would conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), which describes specific considerations for analyzing transportation impacts as amended on July 1, 2020 pursuant to SB 375, which aims to better promote statewide policies that (a) combat climate change by reducing greenhouse gas emissions and particulates; (b) encourage infill development and a diversity of uses instead of sprawl; and (c) promote multi-modal transportation networks, providing clean, efficient access to destinations and improving public health through active transportation. Section 15064.3(b) states that VMT is "generally" the most appropriate measure of transportation impacts. No particular methodology or metric is mandated by section 15064.3(b) and the methodology or metric is left to the lead agency, bearing in mind the criteria the legislature had in mind for determining the significance of transportation impacts in SB-743. These were expressed in Public Resource Code section 21099(b)(1), which states: "[t]hose criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses."

The methodology used in this analysis was presented to the Ukiah City Council on September 21, 2022 and is based on the Sacramento Blueprint Project, which studied how smart growth policies could lead to reductions in VMT. The Sacramento Blueprint Project changed how transportation impacts were analyzed, because it demonstrated that conventional travel demand models have inherent biases that make them insensitive to the effects of residential and employment density, neighborhood design, and a diversity of land uses near one another (the 3 Ds). It went a step further and developed procedures external to a traffic model to forecast the effects of the 3 Ds on travel behavior.

The methodology consists of determining the land use characteristics of each study area (neighborhood, city, county, etc.) and then assessing the potential for interacting with complementary land uses through non-auto trips. Data shows that when housing is near retail and services, people will walk or bike to those uses at least some of the time, and if they drive, the trips will be short (i.e., low VMT trips). Similarly, the likelihood of people walking or biking to work, rather than driving, depends on the distance between their homes and workplaces. Measures of proximity are also measures of the potential for VMT reduction.

The methodology establishes an impact threshold that aims to achieve a rate of VMT per capita for the City, that is at least four percent lower than existing regional averages for Mendocino County. Using the land use diversity methodology described above impacts are considered less than significant provided the local diversity index for the project study area is at least four percent more diverse than the existing Countywide diversity index. For purposes of evaluating Ukiah 2040, the local diversity index is based on the citywide diversity index.

The methodology for assessing transportation impacts in Ukiah is memorialized in a Technical Memorandum dated September 15, 2022, which was included as an attachment to the City Council meeting agenda on September 21, 2022 (Appendix D). This methodology was approved by City Council on October 5, 2022.

## **b. Project Impacts and Mitigation Measures**

**Threshold 1:** Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

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### **Impact TRA-1 THE PROJECT WOULD NOT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE OR POLICY ADDRESSING THE CIRCULATION SYSTEM AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

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Ukiah 2040 would be consistent with the California Complete Streets Act (AB 1358), which requires that cities and other public agencies incorporate “Complete Street” policies when updating their General Plan Circulation Element. Complete Streets make travel safe for all users, including bicyclists, pedestrians, motorists, transit vehicles, and people of all ages and abilities. Ukiah 2040 would incorporate the recommended improvements described in the Ukiah BPMP.

Ukiah 2040 includes policies consistent with the RTP/ATP and SB 743, particularly by emphasizing the provision of multi-modal transportation facilities and reducing VMT, which supports key RTP/ATP policies that aim to reduce VMT and greenhouse gas emissions. The project would lead to overall improvements to the transportation system with individual projects enhancing different aspects of the system including highways, local streets and roads, bicycle and pedestrian facilities, and public transit. As noted above in Section 4.11.1, *Setting*, the City has implemented the Downtown Streetscape Improvement Project and completed three sections of the Great Redwood Trail to increase pedestrian safety and multi-modal opportunities, and is currently seeking additional

opportunities to expand such facilities. Ukiah 2040 is intended to further improve safety for automobile, bicycle, and pedestrian traffic upon implementation, such as reallocating roadway space to allow complete streets improvements on streets with excess capacity and considering the installation of roundabouts.

In addition, the project would support the Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP) that was adopted by the Mendocino County Airport Land Use Commission on May 20, 2021. One of the guiding principles identified in Ukiah 2040 is to “Preserve Ukiah Regional Airport as a vital economic driver and transportation system and maintain consistency with the criteria and policies of the Ukiah Municipal Airport Master Plan.”

The Mobility Element of Ukiah 2040 focuses on enhancing transportation options for Ukiah residents, workers, and visitors and improving mobility through increased connectivity and efficient management of existing infrastructure. Ukiah 2040 would place an increased emphasis on providing multi-modal street facilities that meet the needs of all users, including pedestrians, bicyclists, motorists, transit, movers of commercial goods, children, seniors, and persons with disabilities. The Mobility Element includes the following key proposed policies:

**Policy MOB-1.1: Complete Streets.** The City shall design streets holistically, using a complete streets approach, which considers pedestrians, bicyclists, motorists, transit users, and other modes together to adequately serve future land uses.

**Policy MOB-1.2: Multi-Modal Access.** The City shall require that all new development and redevelopment projects include provisions for multi-modal access provisions such as pedestrian and bicycle facilities, and vehicle and transit where relevant.

**Policy MOB-1.3: Reallocate Space for Complete Streets.** The City shall reallocate roadway space to allow complete streets improvements on streets with excess traffic capacity.

**Policy MOB-1.4: Block Length.** The City shall limit block lengths to 600 feet wherever feasible to enhance multi-modal circulation and connectivity.

**Policy MOB-1.5: Balance Transportation Spending.** The City will provide funding for transportation improvements for each of the key travel modes to support the long-term viability and safety of each mode, as well as required maintenance.

**Policy MOB-1.6: Roundabouts.** The City shall consider the installation of roundabouts to enhance safety at intersections, and as a key component of Ukiah’s sustainability strategy

**Policy MOB-1.7: Land Use and Street Classification Compatibility.** The City shall ensure that General Plan land use density and intensity standards are compatible with the classification of streets from which the land uses are accessed.

**Policy MOB-1.8: New Development and Complete Streets.** The City shall require all new development to provide adequate access for pedestrians, bicyclists, motorists, transit users, and persons with disabilities, as well as facilities necessary to support the City’s goal of maintaining a complete street network.

**Policy MOB-1.9: Bikeway Network.** The City shall strive to complete the citywide bicycle network to create a full network of bicycle facilities throughout Ukiah, including bicycle lanes on all arterial and collector street segments where feasible.

**Policy MOB-1.10: Bicycle Parking Standards.** The City shall maintain efficient and updated parking standards for bicycle parking to ensure development provides adequate bicycle parking, while reducing reliance on automobiles.

**Policy MOB-1.11: Pedestrian Barriers & Utility Relocation.** The City shall support elimination of barriers to pedestrian travel on sidewalks and walking paths including requiring the relocation or undergrounding of utilities where appropriate.

**Policy MOB-2.1: Vehicle Miles Traveled (VMT) Reduction.** The City shall support development and transportation improvements that help reduce VMT below regional averages on a “residential per capita” and “per employee” basis.

**Policy MOB-2.2: Transportation Demand Management.** The City shall support programs to reduce vehicle trips, including measures such as reduced parking requirements that aim to increase transit use, car-pooling, bicycling and walking.

**Policy MOB-2.3: Pedestrian Facilities.** The City shall encourage new development and redevelopment that increases connectivity through direct and safe pedestrian connections to public amenities, neighborhoods, shopping and employment destinations throughout the City.

**Policy MOB-2.4: Transit Facility Design.** The City shall require new development to include facilities designed to make public transportation convenient.

**Policy MOB-2.5: Transit Ridership.** The City shall support funding and incentives to increase transit ridership opportunities.

**Policy MOB-2.6: Downtown Transit Center.** The City shall support creation of a Transit Center.

**Policy MOB-2.7: Bicycle Accessible Transit.** The City shall encourage the MTA and other public transportation providers to make bus routes connecting Ukiah with other areas bicycle accessible.

**Policy MOB-3.1: Safety Improvements.** The City shall provide safety improvements along high-injury and fatality streets and intersections.

**Policy MOB-3.2: Safe Routes to Schools.** The City shall promote Safe Routes to Schools programs for all schools serving the City.

**Policy MOB-3.3: Safety and Traffic Calming.** The City shall use traffic calming methods within residential and mixed-use areas, where necessary, to create a pedestrian-friendly circulation system.

**Policy MOB-3.4: Safety Considerations.** The City shall ensure that planned non- transportation capital improvement projects, on or near a roadway, consider safety for all travel modes during construction and upon completion.

**Policy MOB-3.5: Community Engagement.** The City shall engage the community in promoting safe walking and bicycling through education and outreach.

**Policy MOB-3.6: Emergency Access.** The City shall work with the Ukiah Valley Fire Authority to address street design and the accessibility required for emergency vehicles.

**Policy MOB-3.7: Video Enforcement.** The City shall consider the use of video surveillance for traffic enforcement.

**Policy MOB-3.8: Truck Traffic in Residential Areas.** The City shall discourage truck traffic on local residential streets to increase safety and reduce noise.

**Policy MOB-4.1: Multi-modal Transportation Studies.** The City shall conduct multi-modal transportation studies in association with required updates to the Regional Transportation Plan to update the General Plan and appropriately update and amend the Mobility Element.

**Policy MOB-4.2: Transportation Performance Measures.** The City shall evaluate transportation performance holistically, taking into consideration multi-modal system performance measures that emphasize the efficient movement of people.

**Policy MOB-4.3: Safety Monitoring.** The City shall monitor high-priority corridors and intersections to better understand the potential for safety improvements.

**Policy MOB-4.4: Level of Service.** The City shall use peak-hour traffic level of service (LOS) to consider whether a street or intersection has adequate remaining capacity to service the traffic generated by a proposed project, except that meeting traffic LOS goals should not occur in a manner that would limit travel by other modes or result in increased VMT.

**Policy MOB-4.5: Peak Hour Traffic LOS Goals.** The City shall adopt the following intersection peak hour traffic Level of Service (LOS) goals to guide street network planning (but not to be used for assessing CEQA impacts):

- a) At intersections with signals, roundabouts or four-way stop signs: operation at LOS D, except where pedestrian volumes are high in which case LOS E may be acceptable.
- b) At intersections with stop signs on side streets only: operation at LOS E, except where side streets have very low traffic volumes, in which case LOS F conditions may be acceptable.

**Policy MOB-4.6: Alternate Access Routes.** The City shall explore the feasibility of establishing alternate north/south and east/west access routes.

**Policy MOB-4.7: Meet Future Travel Demand.** The City shall extend existing streets or construct new streets as needed to meet existing and future travel demands.

**Policy MOB-5.1: Incentives for Travel Alternatives.** The City shall work with downtown businesses and employers reduce the need for and expenses of off-street parking by supporting and encouraging alternatives to single-occupant vehicles such as incentives and priority parking for carpools and vanpools, secure bicycle parking, and free bus passes.

**Policy MOB-5.2: Support Provisions for EV Charging.** The City shall support the provision of charging stations for electric vehicles.

**Policy MOB-6.1: Airport Promotion.** The City shall ensure that the airport is a key part of the City's economic development strategy and promotional efforts.

**Policy MOB-6.2: Uniform Airport Area Development Regulations.** The City shall coordinate with the County to develop a similar or duplicate implementing code for development in and around the airport, and to develop an in-fill policy within the Municipal Airport Compatibility Zones.

With implementation of the proposed goals and policies noted above, Ukiah's circulation system would provide enhanced facilities for multi-modal travel, which would result in improved quality of service for users of existing and proposed facilities, improved access, and improved safety for bicyclists and pedestrians. Implementation of the project would not result in conflicts with adopted



policies, plans, ordinances or programs for Ukiah's circulation system, including transit, roadway, bicycle and pedestrian facilities. As such, impacts would be less than significant.

### Mitigation Measures

No mitigation measures would be required.

### Significance After Mitigation

Impacts would be less than significant without mitigation.

**Threshold 2:** Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

**Impact TRA-2 THE PROJECT WOULD PROVIDE A DIVERSITY OF LAND USES SUPERIOR TO COUNTYWIDE AVERAGES AND WOULD THUS BE ANTICIPATED TO GENERATE VMT AT LOWER RATES THAN COUNTYWIDE AVERAGES. THE PROJECT WOULD NOT CONFLICT WITH OR BE INCONSISTENT WITH CEQA GUIDELINES 15064.3(B) AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

As described in the Methodology subsection of Section 4.11.3, *Impact Analysis*, transportation impacts due to Ukiah 2040 [relevant to CEQA Guidelines Section 15064.3(b)] are analyzed by comparing the City's land use diversity score with implementation of Ukiah 2040 to the existing countywide land use diversity score average.

Figure 4.11-1, Figure 4.11-2, and Figure 4.11-3 show the existing distribution of households, retail jobs, and non-retail jobs by zones in Ukiah, respectively. Figure 4.11-4 shows the existing distribution of total trips. Figure 4.11-5 through Figure 4.11-7 show the three diversity scores for existing land uses within the City and proposed Annexation Areas. Figure 4.11-8 shows the total diversity score and total trips for each zone. These figures show the following:

- Much of the City core scores well on jobs/housing diversity (see Figure 4.11-5). This indicates people in Ukiah live close to where they work.
- The edges of the City do not score as well on jobs/housing diversity (see Figure 4.11-5). However, this does not lower the City's overall score as much as Figure 4.11-5 might imply. This is because there are relatively few jobs and residences in those areas (see Figure 4.11-2, Figure 4.11-3, and Figure 4.11-4).
- The City is over-retailed in relation to its population because it serves as the main retail destination for a large surrounding area (see Figure 4.11-6).
- Figure 4.11-7 shows that, except for the City core, retail and non-retail jobs tend to be concentrated in different parts of the City. The distance between the retail and non-retail uses tends to discourage walking or bicycling between the uses and requires longer trips; therefore, this limits the potential for interaction that does not involve driving.

Figure 4.11-9, Figure 4.11-10, and Figure 4.11-11 show the anticipated distribution of households, retail jobs, and non-retail jobs with development anticipated under Ukiah 2040. Figure 4.11-12 shows the anticipated total trips by zone. Figure 4.11-13 through Figure 4.11-15 show the updated diversity scores for the anticipated land uses in 2040. Figure 4.11-16 shows the total diversity score and total trips for each zone under Ukiah 2040.

The results of the analysis are summarized in Table 4.11-2. The diversity score ranges from 0.00 to 1.00, with lower scores (close to 0.00) representing diverse conditions, and higher scores (closer to

1.00) representing less diverse conditions. Under existing conditions, the Countywide diversity index is 0.50. Impacts resulting from Ukiah 2040 would be considered potentially significant if the Citywide diversity score is 0.48 or higher.

As shown in Table 4.11-2, the citywide diversity score would be reduced from 0.30 under existing conditions to 0.42 under Ukiah 2040. Based on this analysis, development under Ukiah 2040 would result in a diversity of land uses that would be less diverse than existing conditions in Ukiah. This is due to the amount of non-residential development that could occur in the maximum buildout scenario. Given the total size of non-residential development relative to residential growth in the maximum buildout scenario, there could be a net increase in the number of non-resident workers commuting to jobs in Ukiah. Nonetheless, the diversity score for Ukiah 2040 would remain below the existing countywide average of 0.50, and below the impact threshold of 0.48. The diversity of land uses in Ukiah would therefore be expected to generate VMT at lower rates than countywide averages. Based on this analysis, transportation impacts relevant to CEQA Guidelines Section 15064.3(b) would be less than significant.

In addition, the City has identified screening thresholds to identify the types of projects that would be expected to result in a less than significant transportation impact. The screening thresholds are included in Appendix D of this EIR. The City has identified that the following projects are expected to result in less than significant impacts: small projects that meet existing categorical CEQA exemptions, residential uses, employment uses in areas with a diverse mix of land uses, local-serving retail, projects in proximity to a major transit stop, and transportation projects. Specifically, as described in the methodology provided in Appendix D, all residential projects in Ukiah are expected to result in less than significant transportation impacts relevant to VMT and SB-743 because (1) residences located in Ukiah generate low rates of home-based VMT per capita compared to the rest of Mendocino County (roughly half the Countywide average based on the MCOG travel demand model), given greater proximity to jobs and services; and (2) Ukiah has a jobs/housing imbalance, with an excess of jobs relative to the number of households that results in most Ukiah jobs being filled by non-resident commuters. Therefore, the provision of housing in Ukiah would increase the likelihood that a larger portion of workers employed in Ukiah may also reside in Ukiah, thus reducing VMT given shorter commute lengths. The screening threshold for employment uses would be applicable to proposed commercial land uses in which most daily trips would be generated by employees (not customers), such as proposed office projects. Lastly, neighborhood shopping centers of up to 125,000 square feet [as defined by the International Council of Shopping Centers (ICSC) U.S. Shopping Center Classification and Characteristics] provide 30,000 to 125,000 square feet of gross leasable area, typically anchored by a supermarket and/or large drugstore with a trade area of 3 miles or less and would be screened out as having less than significant impacts. Future projects would be screened by City staff using the methodology identified in Appendix D.

**Table 4.11-2 Land Use Diversity Assessment**

	Existing Conditions	Ukiah 2040 Buildout
Citywide Diversity Score	0.30	0.42
Countywide Diversity Score	0.50	
Impact Threshold	0.48 or higher	
Impact Finding	Less than Significant	

Note: lower scores represent diverse land use patterns anticipated to generate lower rates of VMT, while higher scores represent less-diverse land use patterns anticipated to result in higher rates of VMT. Source: Appendix D.

### **Mitigation Measures**

No mitigation measures would be required.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation.



Figure 4.11-1 Existing Distribution of Households

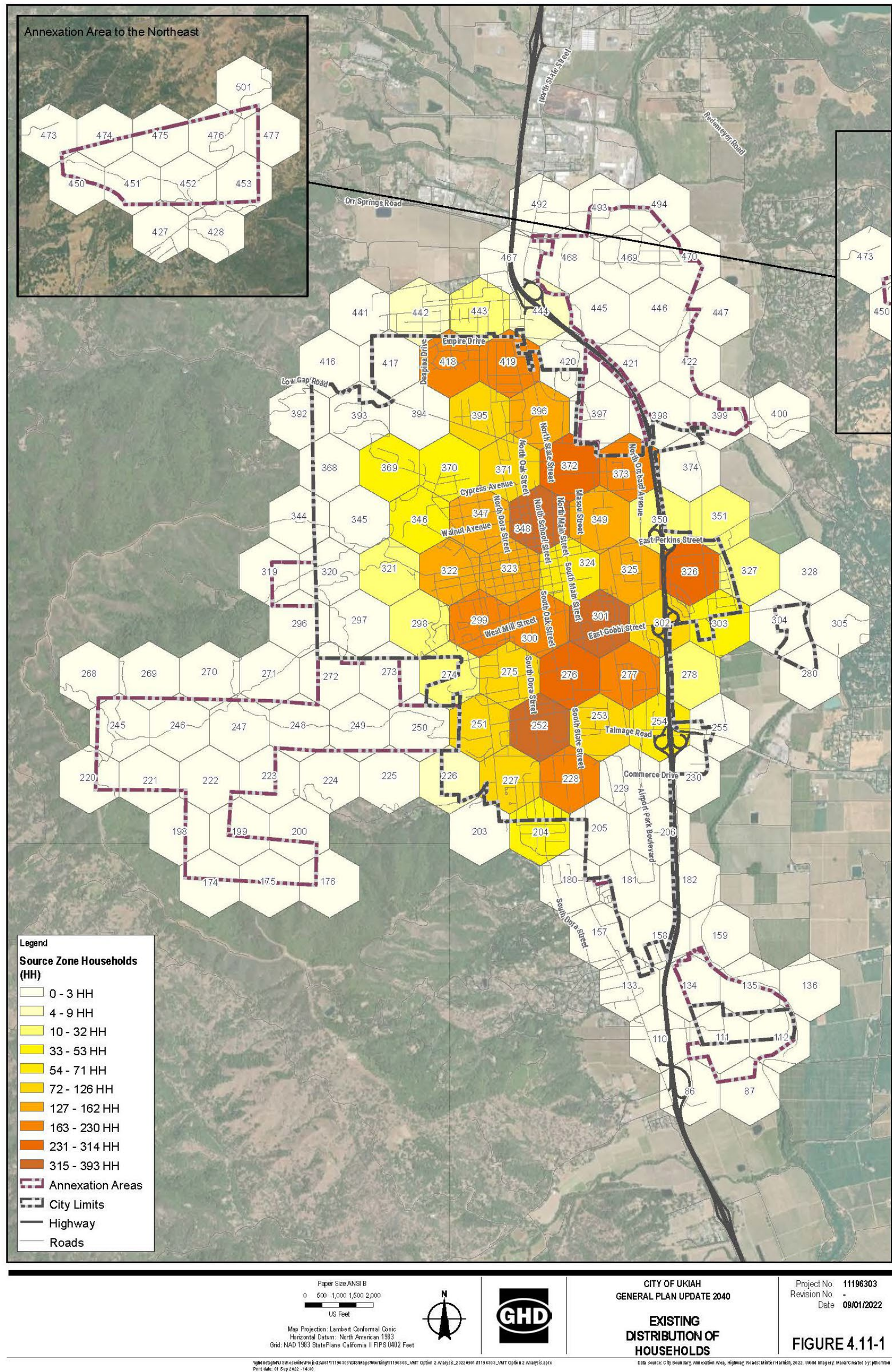




Figure 4.11-2 Existing Distribution of Retail Jobs

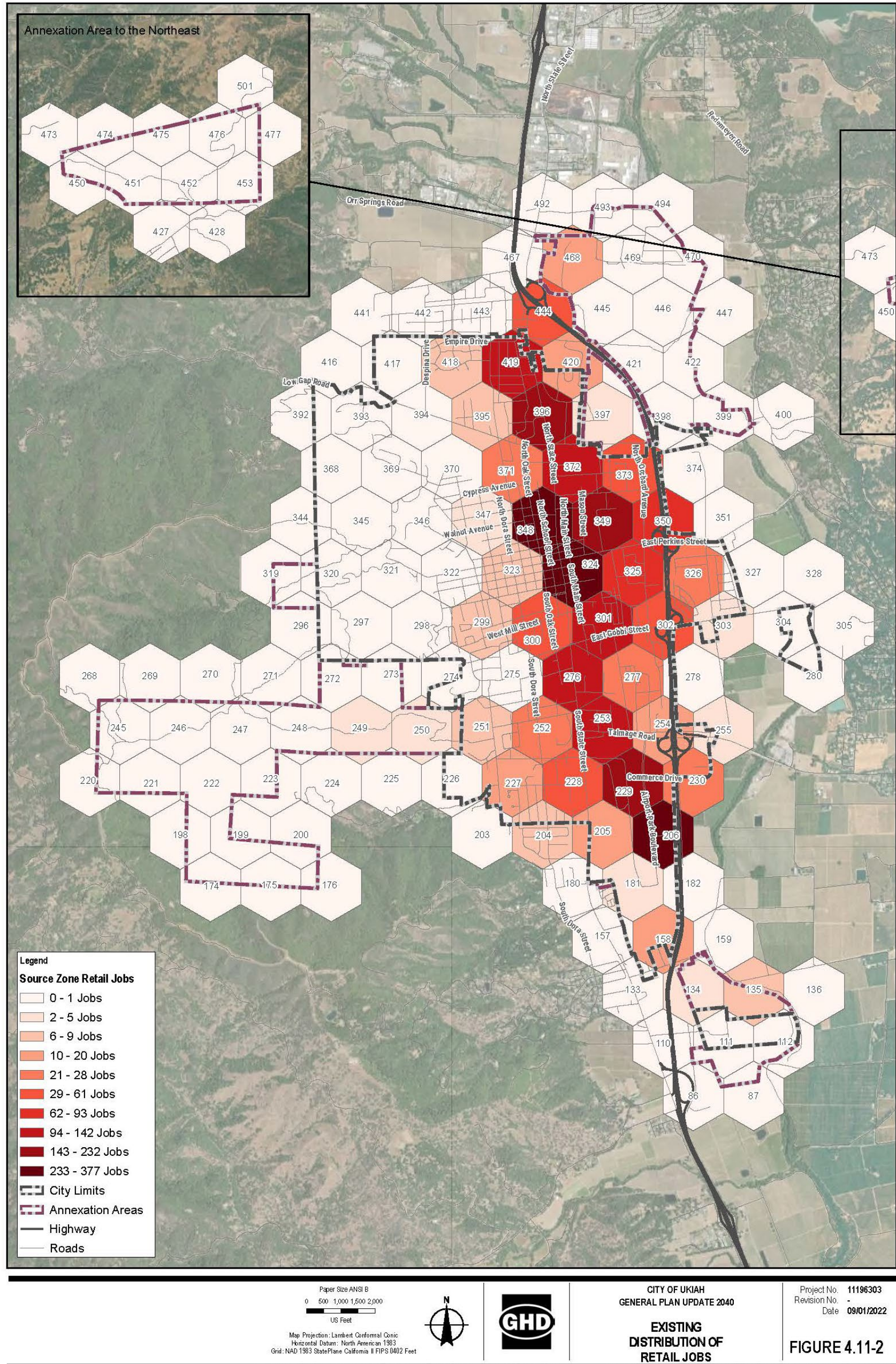
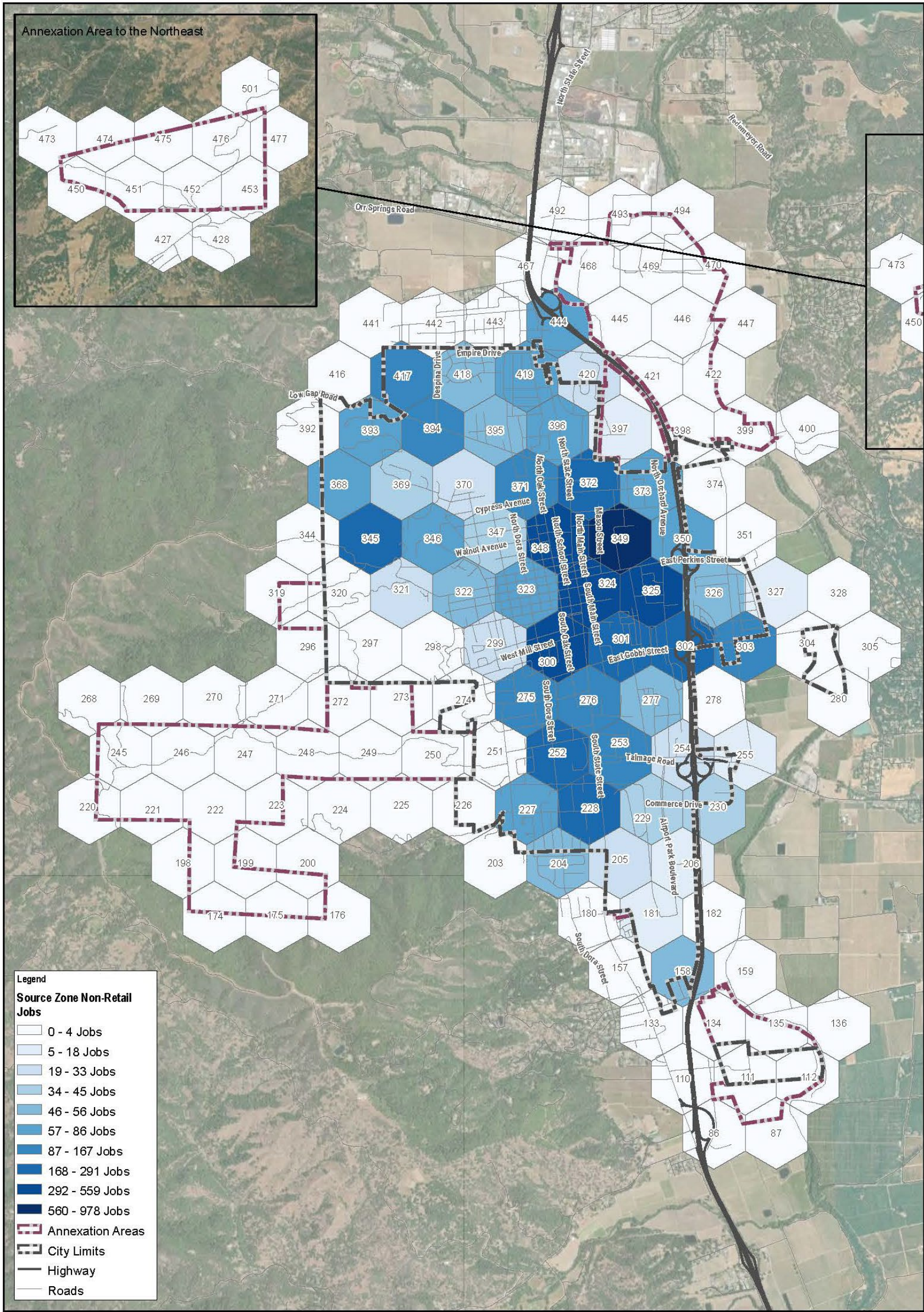






Figure 4.11-3 Existing Distribution of Non-Retail Jobs



Paper Size ANSI B  
0 500 1,000 1,500 2,000  
US Feet

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



CITY OF UKIAH  
GENERAL PLAN UPDATE 2040

**EXISTING  
DISTRIBUTION OF  
NON-RETAIL JOBS**

Project No. 11196303  
Revision No. -  
Date 09/01/2022

**FIGURE 4.11-3**



Figure 4.11-4 Existing Distribution of Total Trips

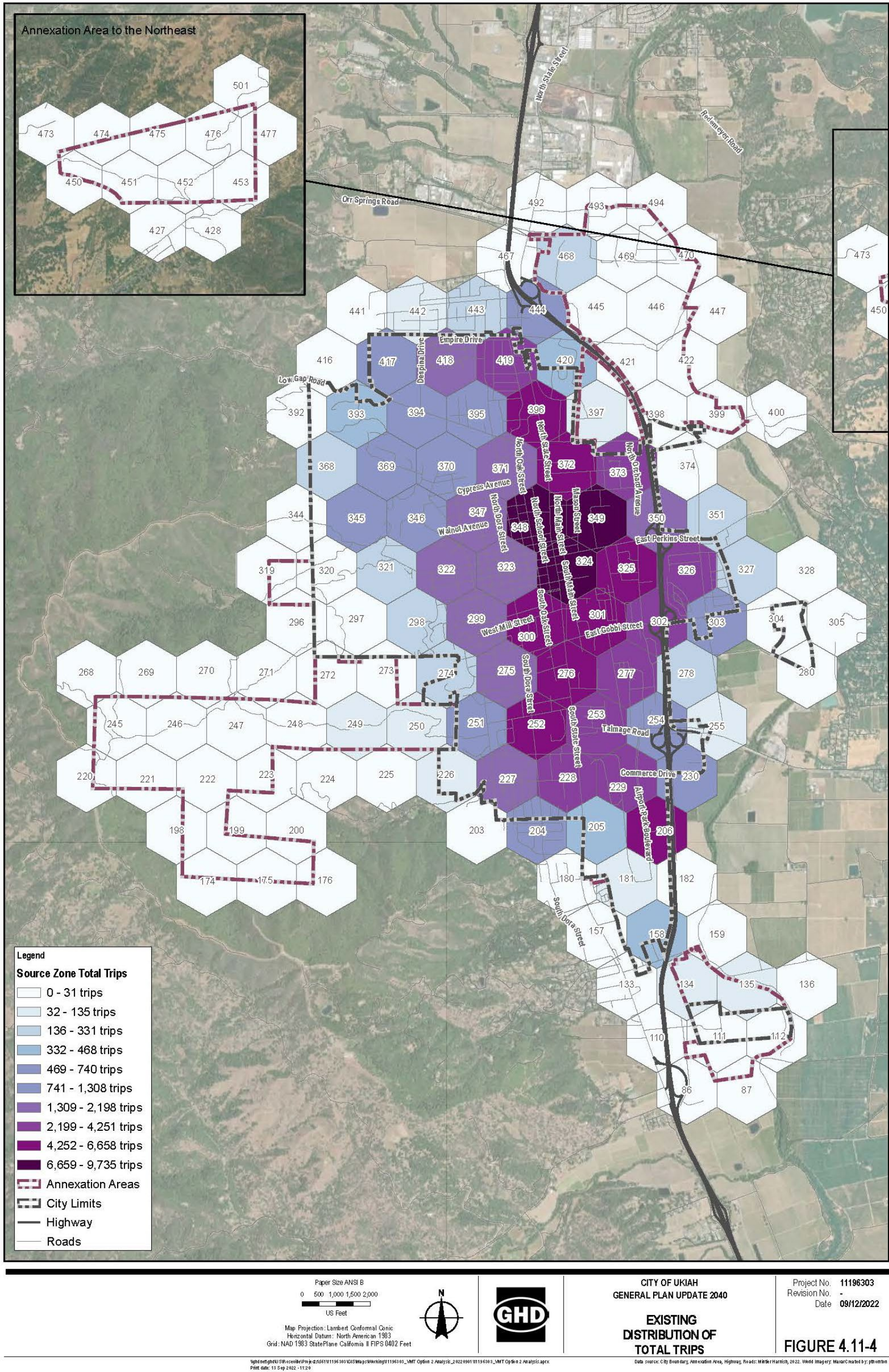




Figure 4.11-5 Existing Jobs/Housing Diversity

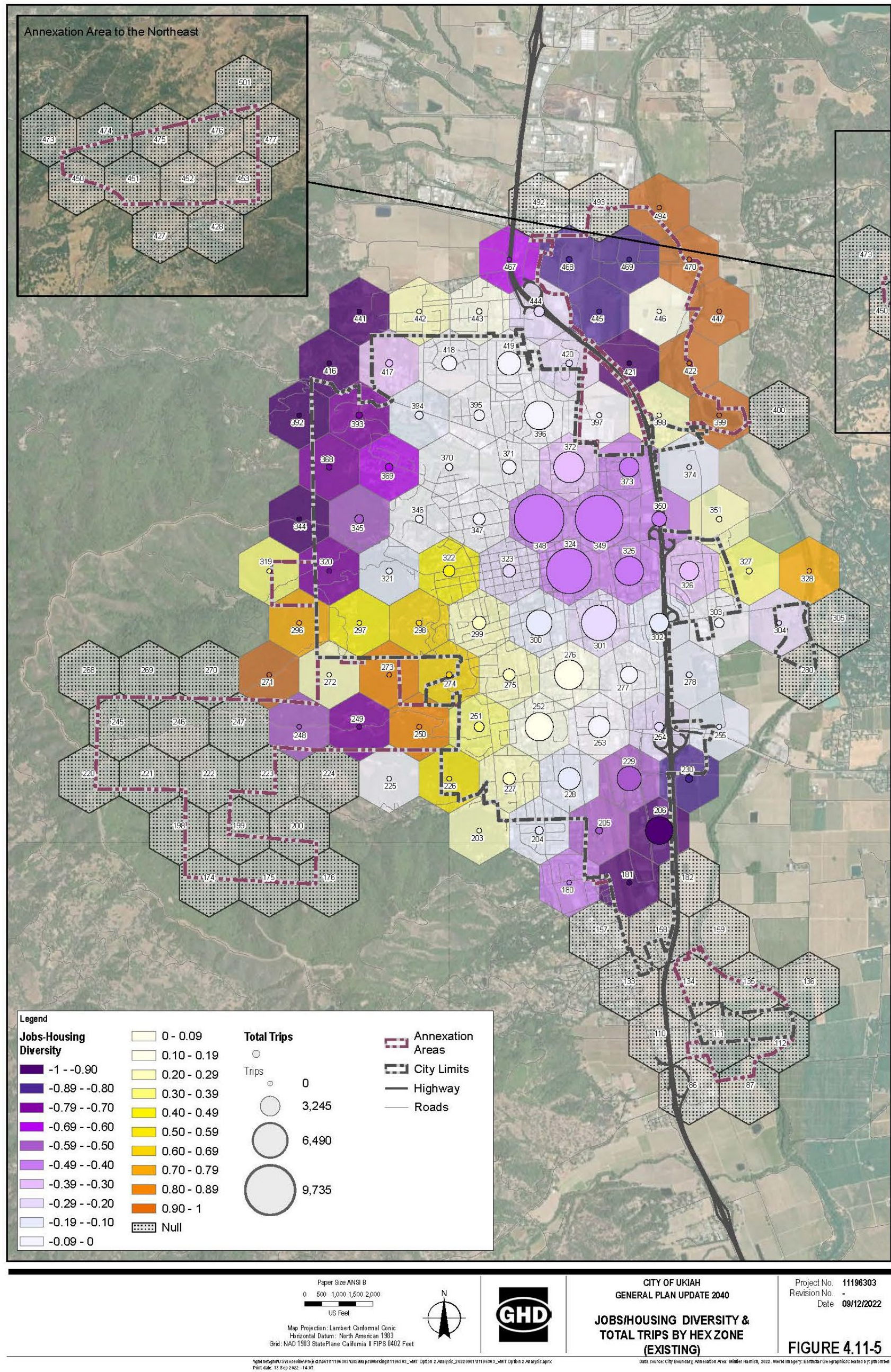




Figure 4.11-6 Existing Retail/Housing Diversity

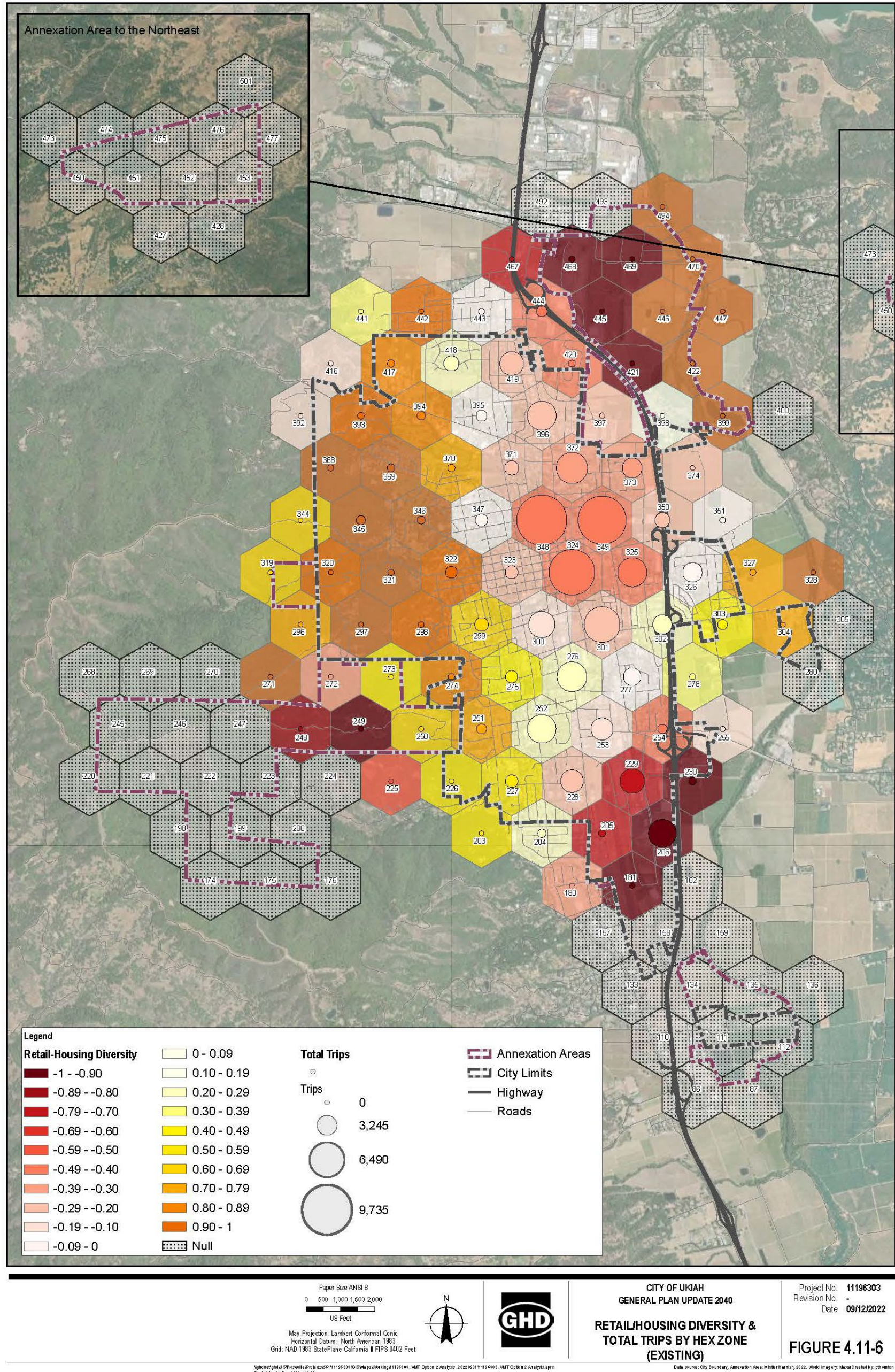




Figure 4.11-7 Existing JobMix Diversity

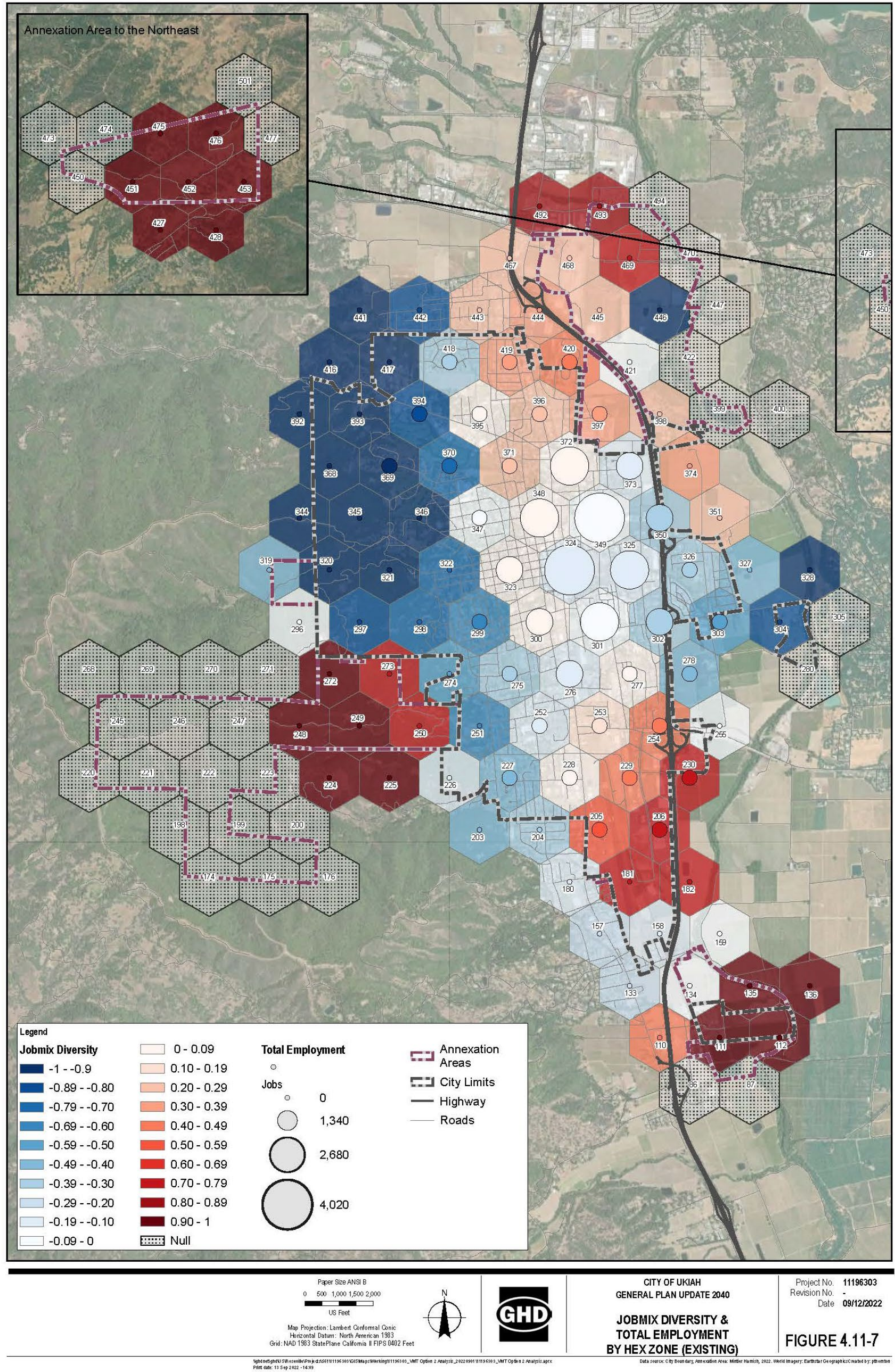
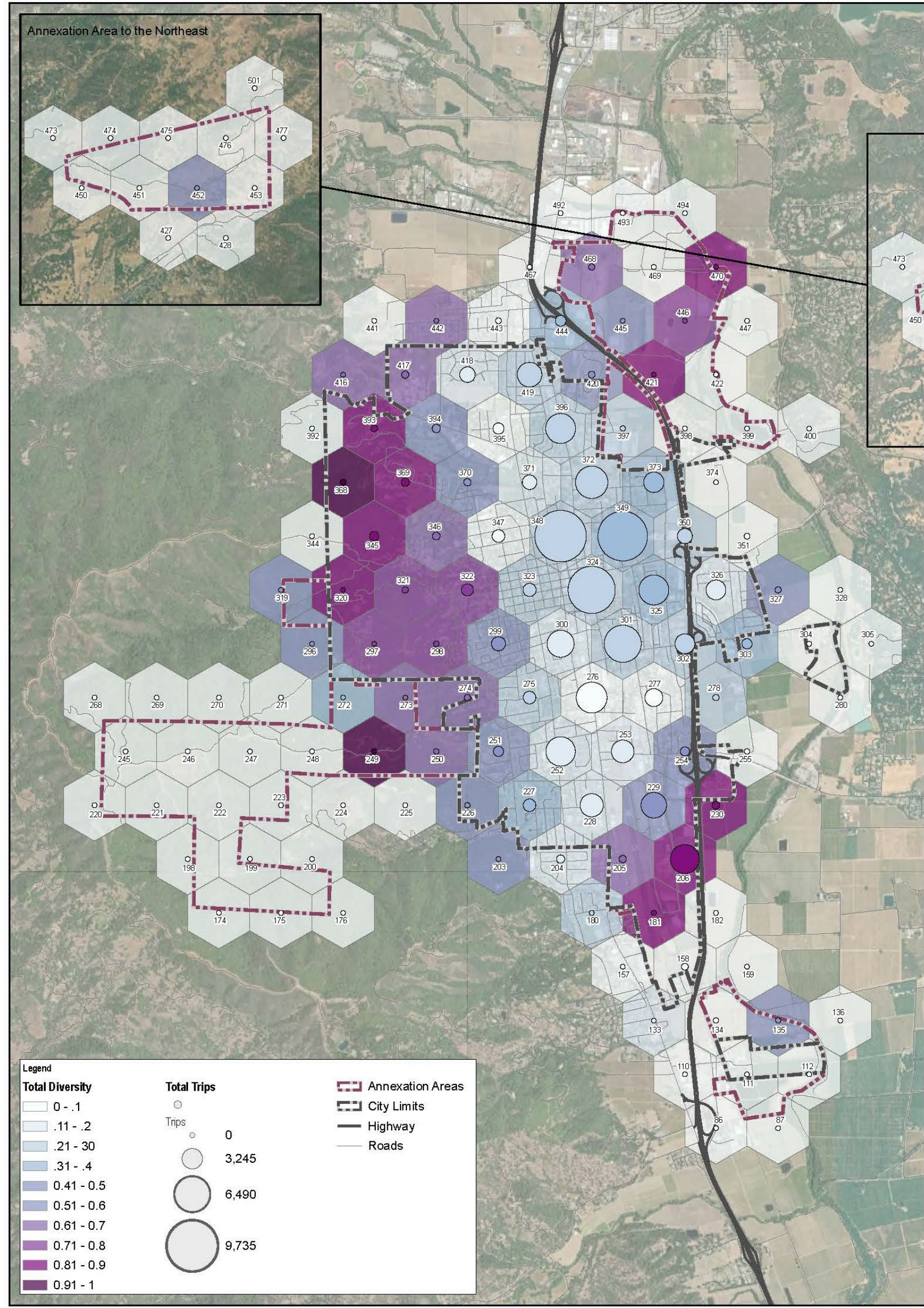




Figure 4.11-8 Existing Total Diversity & Total Trips by Zone



Paper Size ANSI B  
0 500 1,000 1,500 2,000  
US Feet  
Map Projection: Lambert Conformal Conic  
Horizontal Datum: North American 1983  
Grid: NAD 1983 StatePlane California II FIPS 0402 Feet



CITY OF UKIAH  
GENERAL PLAN UPDATE 2040  
**TOTAL DIVERSITY & TOTAL  
TRIPS BY HEX ZONE  
(EXISTING)**

Project No. 11196303  
Revision No. -  
Date 09/19/2022

FIGURE 4.11-8

lightnet\gtd\SW\reseller\Proj\256611\1196303\GIS\Map\SW\working\1196303\_VMT\_Op\Opn 2\_Analysis\_2022\0911\1196303\_VMT\_Op\Opn 2\_Analysis.aprx  
Print date: 19 Sep 2022 - 11:43

Data source: City Boundary, Annexation Area: Minter Hamish, 2022. World Imagery: Earthstar Geographic created by: phomlin











**Figure 4.11-11 Ukiah 2040 Project: Distribution of Non-Retail Jobs**

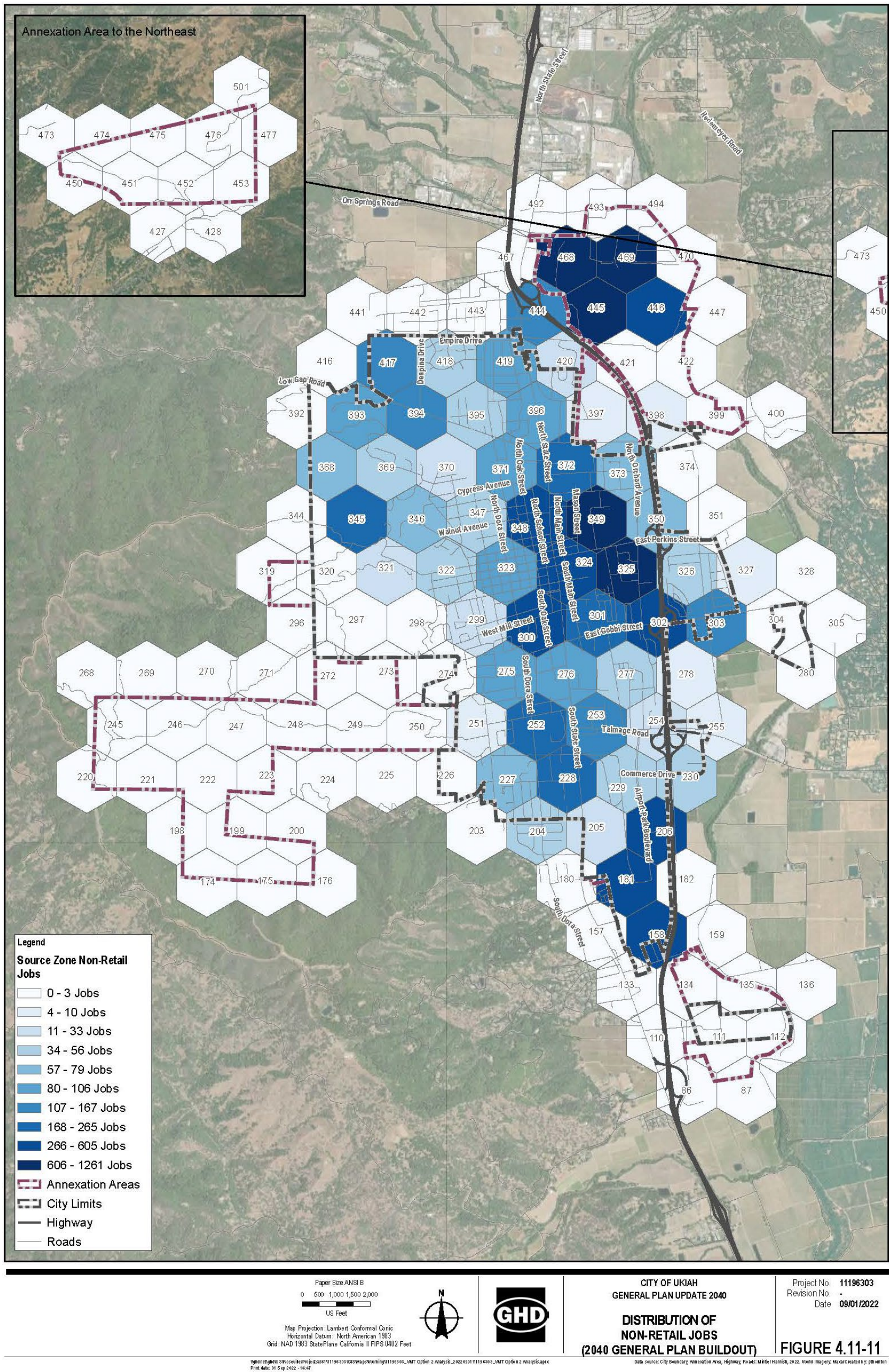




Figure 4.11-12 Ukiah 2040 Project: Distribution of Total Trips

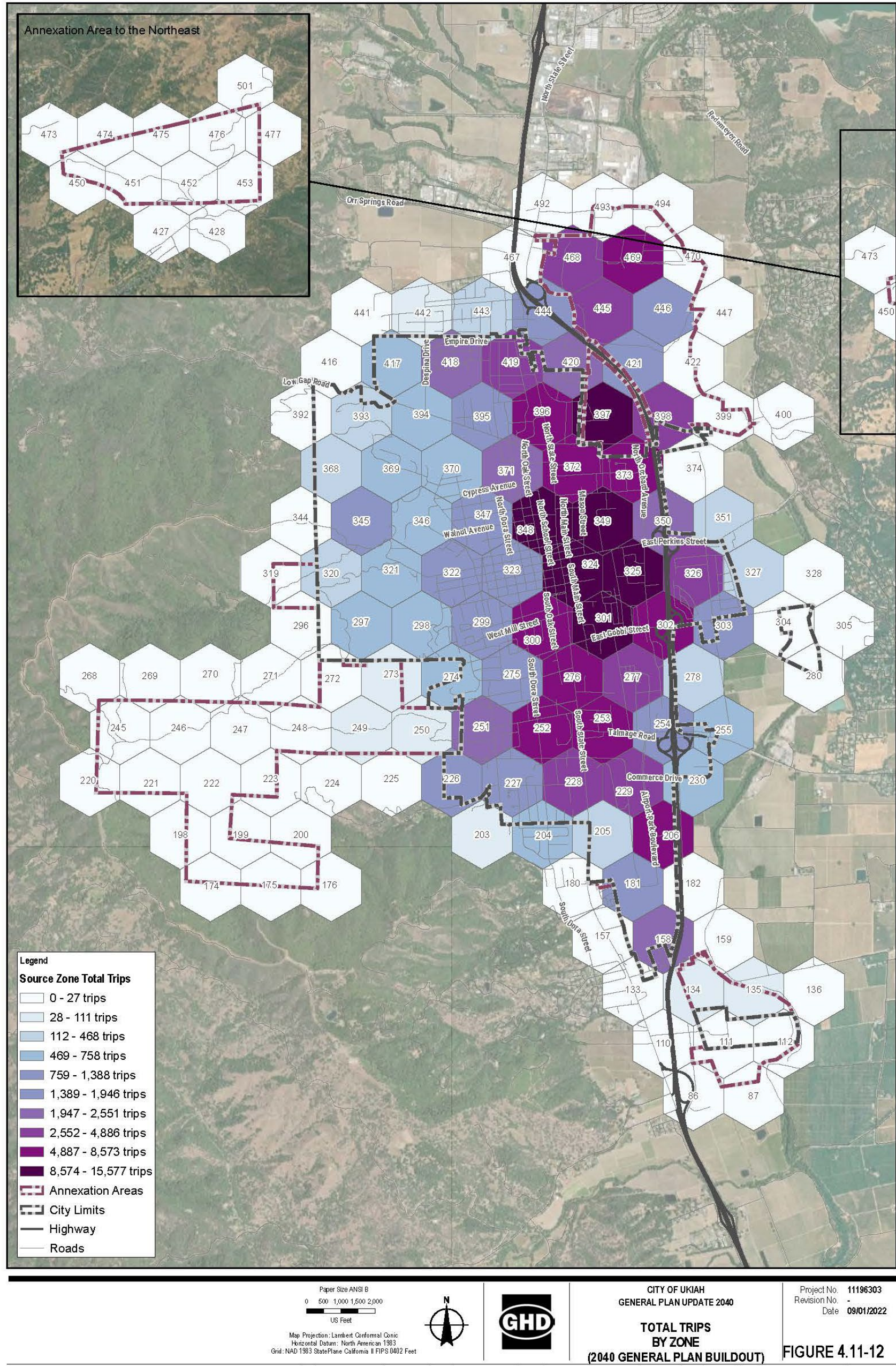




Figure 4.11-13 Ukiah 2040 Project: Jobs/Housing Diversity

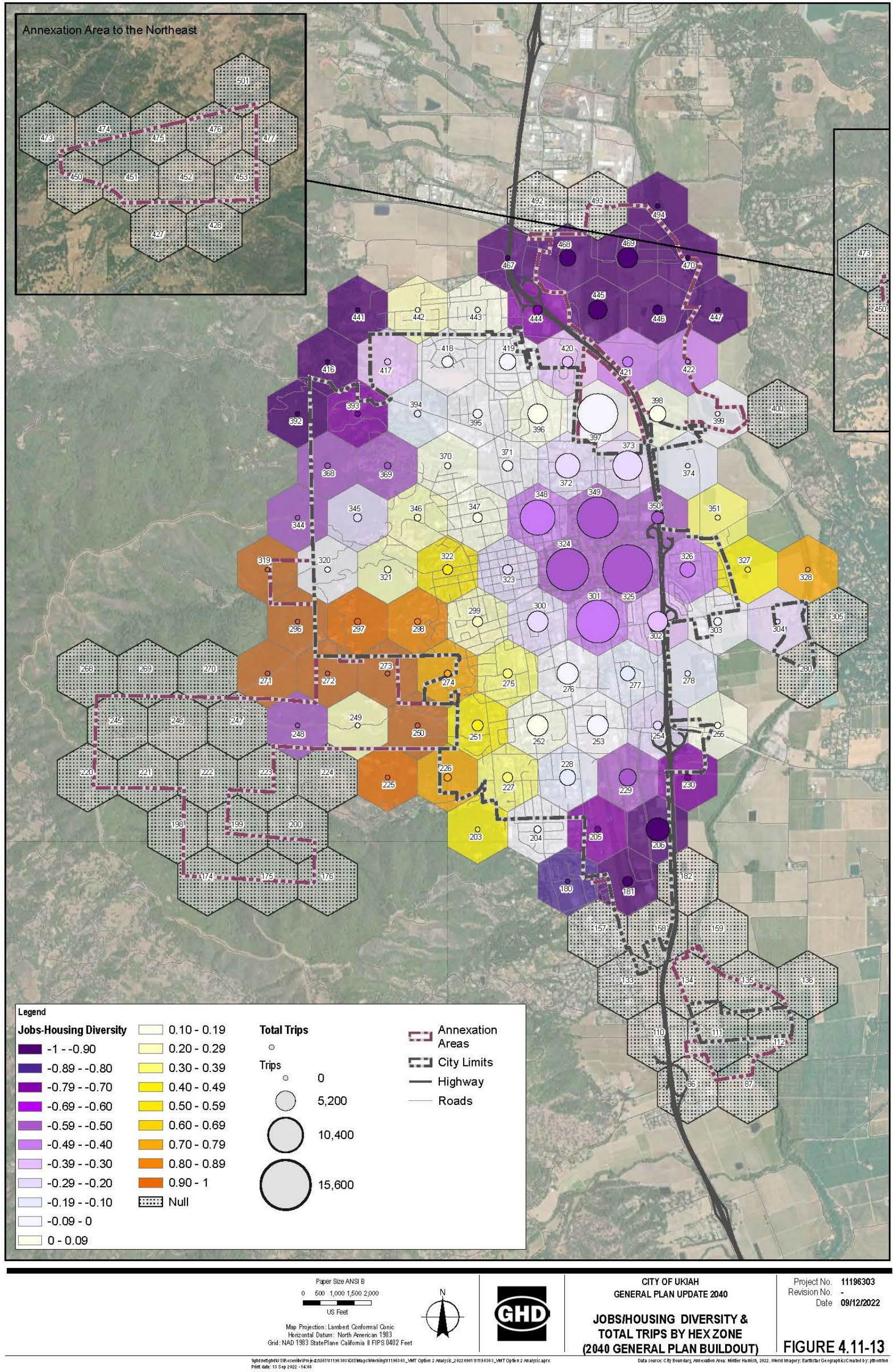




Figure 4.11-14 Ukiah 2040 Project: Retail/Housing Diversity

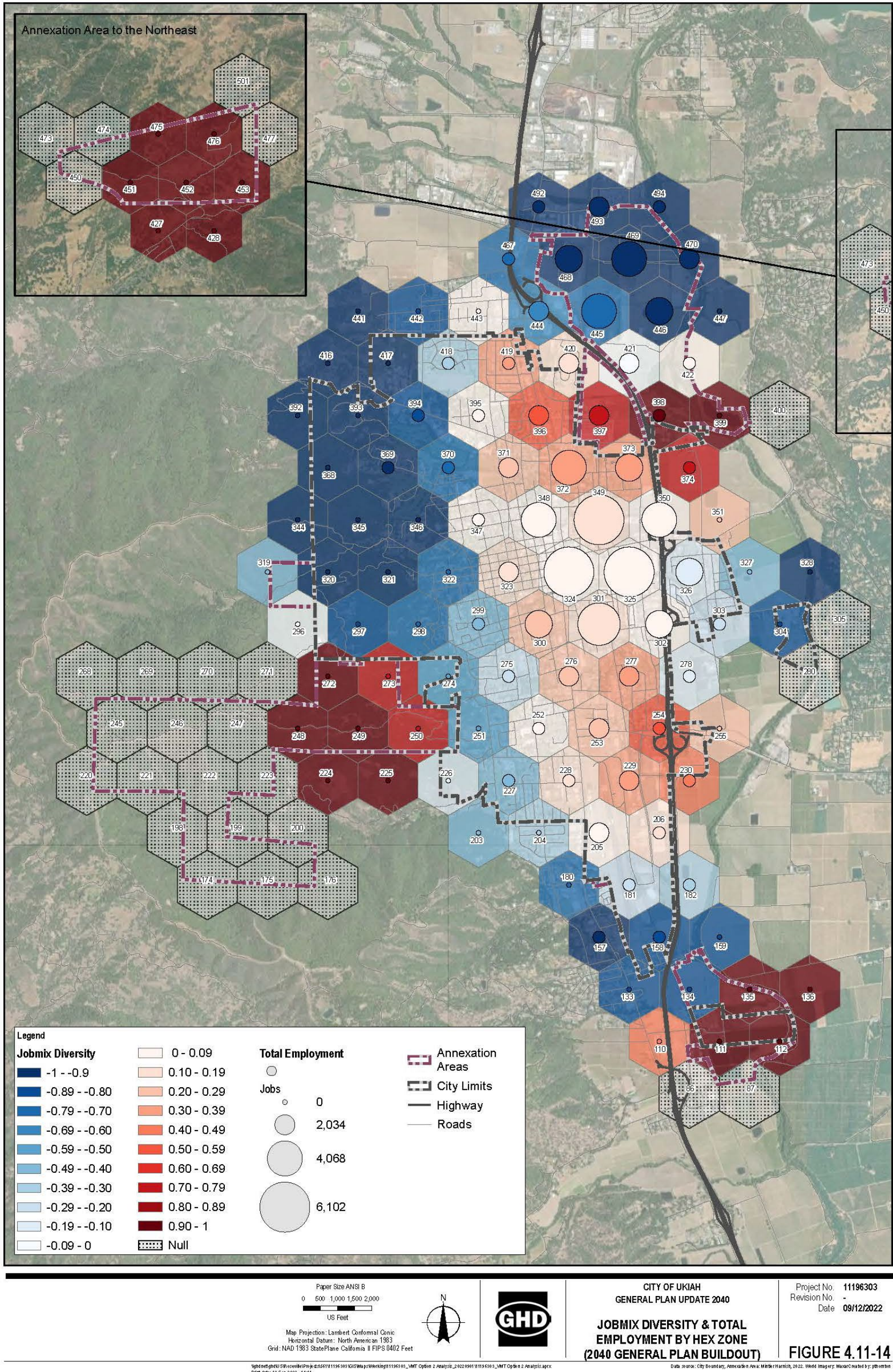




Figure 4.11-15 Ukiah 2040 Project: JobMix Diversity

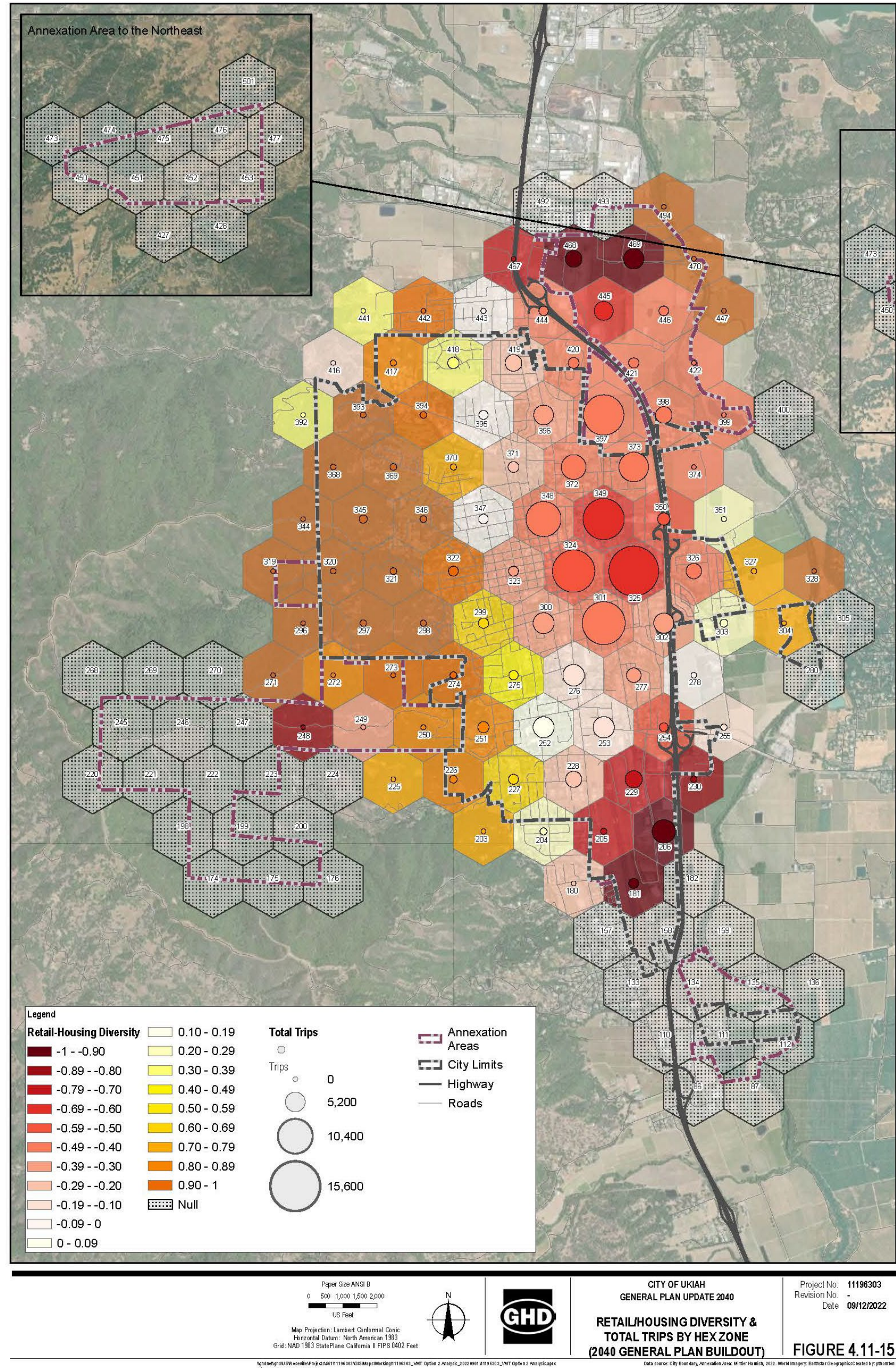
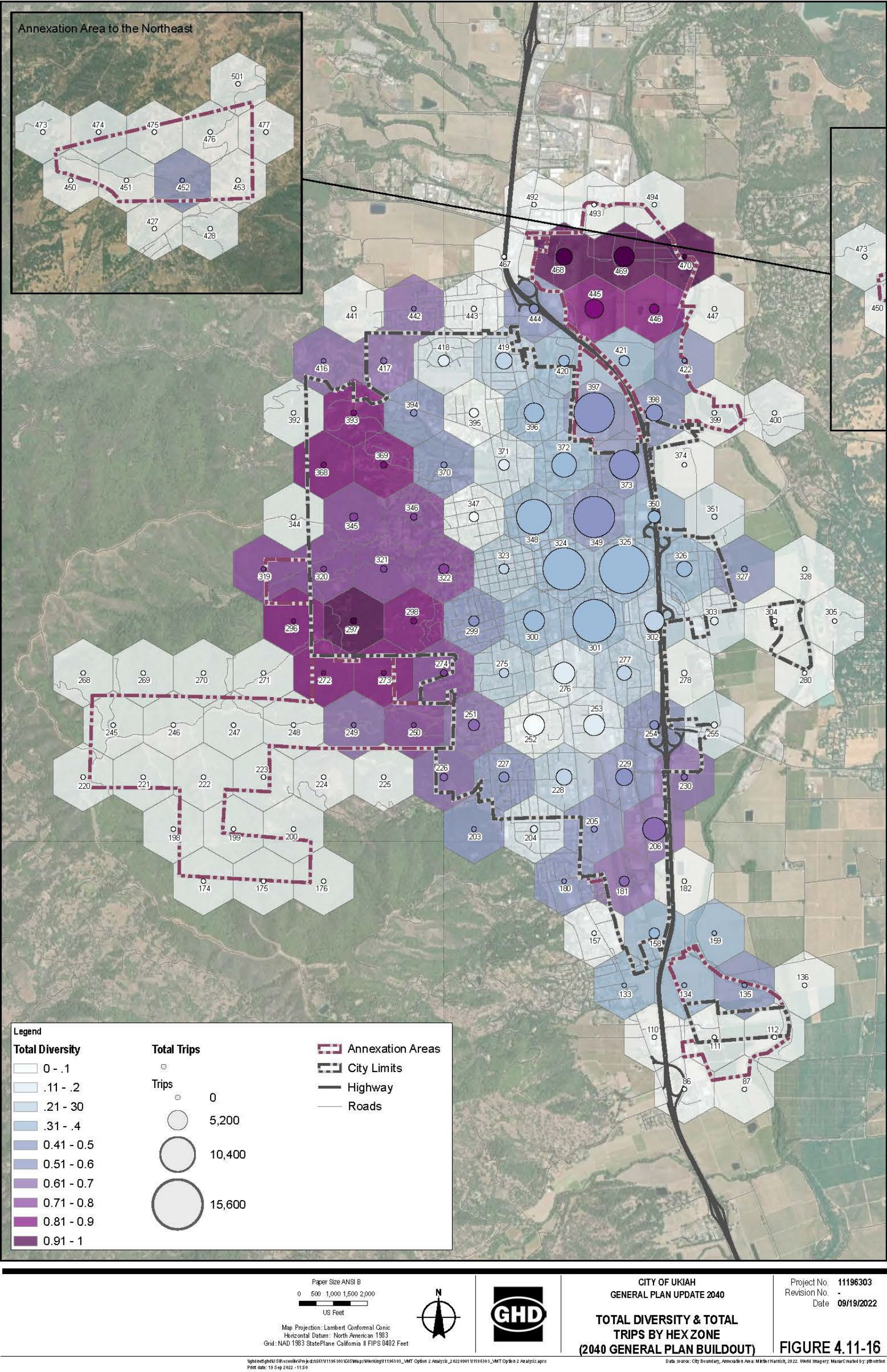




Figure 4.11-16 Ukiah 2040 Project: Total Diversity & Total Trips by Zone





**Threshold 3:** Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

**Impact TRA-3 THE PROJECT WOULD NOT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

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Ukiah 2040 is a program-level planning effort which does not directly address geometric design features. Ukiah 2040 includes proposed policies that would ensure efficient circulation and adequate access are provided in the city including Policies MOB-1.1, MOB-1.2, MOB-1.6, MOB-1.8, MOB-1.9, MOB-1.10, MOB-1.11, MOB-2.3, MOB-2.4, MOB-3.1 through MOB-3.6, MOB-3.8, MOB-4.1, and MOB-4.3 (see Impact TRA-1), which are relevant to minimizing hazards. Future development under Ukiah 2040 would also be required to comply with street design standards, Manual of Uniform Traffic Control Devices (MUTCD) requirements, fire code requirements and zoning regulations, ensuring that the adoption of Ukiah 2040 would result in less-than- significant impacts with respect to design hazards.

**Mitigation Measures**

No mitigation measures would be required.

**Significance After Mitigation**

Impacts would be less than significant without mitigation.

**Threshold 4:** Would the project result in inadequate emergency access?

**Impact TRA-4 THE PROJECT WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

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Implementation of Ukiah 2040 would result in increased development and facilitate population growth, which would increase the number of users on the City's transportation system. The existing street and highway system has sufficient capacity to ensure adequate emergency access provisions to accommodate increased population and growth. In addition, Ukiah 2040 includes a guiding principle to "Provide for a safe community through resilient infrastructure, community-wide education and preparation, and hazard planning that is responsive to potential climate-related, natural, and human-caused disasters." In addition, Ukiah 2040 includes proposed Policies MOB-3.6 and MOB-4.6 (see Impact TRA-1), relevant to ensuring adequate emergency access. Future development under Ukiah 2040 would be required to comply with existing regulations, including fire code, building code, street design standards, and zoning regulations that address site-specific provisions related to emergency access. This will further ensure that the adoption of Ukiah 2040 would result in less-than-significant impacts with respect to emergency access.

**Mitigation Measures**

No mitigation measures would be required.

**Significance After Mitigation**

Impacts would be less than significant without mitigation.

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## 4.12 Tribal Cultural Resources

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This section analyzes the potential effects on tribal cultural resources related to implementation of the project.

### 4.12.1 Setting

The project lies within an area traditionally occupied by the Northern Pomo Tribe. A full discussion of the precontact and ethnographic setting of the region is presented in Section 4.5, *Cultural Resources*.

### 4.12.2 Regulatory Setting

#### **a. Federal Regulations**

There are no federal regulations pertaining to tribal cultural resources that are applicable to this analysis.

#### **b. State Regulations**

##### **Assembly Bill 52**

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands the California Environmental Quality Act (CEQA) by defining a new resource category, “tribal cultural resources.” Assembly Bill 52 establishes that “A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and meets either of the following criteria:

- 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 section 5020.1(k), or
- 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

If a lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, AB 52 requires the implementation of mitigation measures identified in the consultation



process required under PRC Section 21080.3.2. If consultation fails to identify specific mitigation, PRC Section 21084.3(b) lists the following measures that may be considered, where feasible, to avoid or minimize the impacts:

- Avoidance and preservation of the resources in place, including, but not limited to: planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
  - Protecting the cultural character and integrity of the resource.
  - Protecting the traditional use of the resource.
  - Protecting the confidentiality of the resource.
  - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - Protecting the resource.

## **Senate Bill 18**

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill [SB] 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to deciding to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005), "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

### **c. AB 52 and SB 18 Process for Ukiah 2040**

On April 7, 2022, a letter was sent to the NAHC requesting a current SB 18 and AB52 Native American Contact List for the project vicinity. On June 9, 2022, the NAHC provided a list of 15 tribal contacts with tribal connections to the Planning Area. In accordance with AB 52 and SB 18, the City of Ukiah notified the following 15 tribes of the project and invited them to participate in consultation:

- Bear River Band of Rohnerville Rancheria
- Coyote Valley Band of Pomo Indians
- Guidiville Indian Rancheria
- Habematolel Pomo of Upper Lake
- Hopland Band of Pomo Indians
- Kashia Band of Pomo Indians of the Stewarts Point Rancheria
- Cahto Tribe
- Manchester Band of Pomo Indians of the Manchester Rancheria
- Noyo River Indian Community
- Potter Valley Tribe

- Redwood Valley or Little River Band of Pomo Indians
- Robinson Rancheria of Pomo Indians
- Round Valley Reservation/Covelo Indian Community
- Sherwood Valley Rancheria of Pomo
- Yokayo Tribe

The City prepared and mailed letters on June 21, 2022, informing all 15 tribes listed above of the General Plan update (Ukiah 2040), in accordance with SB 18 and AB 52. On June 29, 2022, the Sherwood Valley Rancheria of Pomo Indians of Northern California (Sherwood Valley) responded, requesting that Ukiah 2040 consider recorded sites and/or cultural resources that are affected during any ground disturbance work, cultural resource protection measures on permit applications, and that the Most Likely Descendent be contacted if cultural resources are found, disturbed, or threatened. The City of Ukiah responded to the Tribe's letter on July 6, 2022, and shared the policies in Ukiah 2040 that would protect cultural and tribal cultural resources. For additional information about the policies in Ukiah 2040 that would protect cultural and tribal cultural resources, please refer to Impact TCR-1 below. Sherwood Valley did not provide any further comments.

On July 13, 2022, Habematolel Pomo of Upper Lake (Habematolel Pomo) responded via email and stated that the area of Ukiah 2040 is outside of the aboriginal territories of the Habematolel Pomo and deferred correspondence to the Pinoleville Pomo Nation, Redwood Valley, and Guidiville Indian Rancheria. The City of Ukiah responded via email on July 26, 2022 notifying the Habematolel Pomo that letters had been sent to the all three tribes the Habematolel Pomo had suggested. Habematolel Pomo did not have any further comments.

A full schedule of AB 52 and SB 18 consultation between the City and consulted tribes is shown in Table 4.12-1 below.

**Table 4.12-1 Summary of AB 52/SB 18 Correspondence**

Activity Date	Activity	Materials Provided/Agenda Topics
<b>Ukiah 2040 Consultation</b>		
June 22, 2022	AB 52 and SB 18 notice	Both the AB52 and SB18 notices were mailed and e-mailed to tribes
June 29, 2022	E-mail from Sherwood Valley Rancheria to City	Response letter to AB52 and SB18 notice requesting specific measures be included within Ukiah 2040
July 6, 2022	E-mail from City to Sherwood Valley Rancheria	Response letter including proposed Ukiah 2040 policies protecting cultural and tribal cultural resources
July 13, 2022	E-mail from Habematolel Pomo Upper Lake to City	Response letter stating Ukiah 2040 area is outside of aboriginal territories and suggesting three tribes for the City to contact
July 26, 2022	E-mail from City to Habematolel Pomo Upper Lake with attachments	Notified the tribe that letters had been sent to the three tribes suggested in their letter during the initial notifications
Source: City of Ukiah 2022		

### 4.12.3 Impact Analysis

#### a. Significance Thresholds and Methodology

##### Significance Thresholds

According to Appendix G of the *CEQA Guidelines*, impacts related to tribal cultural resources from implementation of the project would be significant if it would:

1. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 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:
  - a. 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 section 5020.1(k), or
  - b. 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 section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

##### Methodology

The presence and significance of a potential tribal cultural resource is determined through consultation between lead agencies and local California Native Americans. Impacts to tribal cultural resources are highly dependent on the nature of the resource but, in general, could occur if there is destruction or alteration of the resource and its surroundings, access restrictions to the resource, or other disturbances.

#### b. Project Impacts and Mitigation Measures

**Threshold 1a:** Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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 Section 5020.1(k)?

**Threshold 1b:** Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1?

**Impact TCR-1      DEVELOPMENT FACILITATED BY THE PROJECT MAY INVOLVE EXCAVATION, WHICH HAS THE POTENTIAL TO IMPACT PREVIOUSLY UNIDENTIFIED TRIBAL CULTURAL RESOURCES. HOWEVER, WITH ADHERENCE TO EXISTING CEQA REGULATIONS AND PROPOSED UKIAH 2040 POLICIES, IMPACTS ON TRIBAL CULTURAL RESOURCES WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

Because the effects on tribal cultural resources are highly dependent on the individual project site conditions and characteristics of the proposed activity, including the level of ground disturbance, effects on tribal cultural resources can only be known once a specific project has been proposed. As

described in Section 4.12.2, *Regulatory Setting*, the City sent letters to Native American tribes provided by the NAHC, per SB 18 and AB 52 requirements and to date, no tribes have responded requesting consultation under AB 52 or SB 18, although Sherwood Valley did respond requesting Ukiah 2040 include consideration of resources that are affected during ground disturbance work, cultural protection measures on permit applications, and to have the Most Likely Descendant contacted if cultural resources are found, disturbed, or threatened.

Although the current AB 52 and SB 18 outreach did not result in the identification of any tribal cultural resources (TCRs) within the City, TCRs may be identified during implementation of future projects facilitated by Ukiah 2040. As specific projects are proposed, consultation with tribes under AB 52 would occur to determine if any TCRs may be impacted by specific projects. If TCRs are identified during AB 52 consultation, compliance with AB 52 on a project-by-project basis, as required, would ensure that development facilitated by Ukiah 2040 does not have a detrimental effect on TCRs.

In addition, the following proposed policies in Ukiah 2040 would require future projects to comply with Tribal Consultation and consult with the City if any TCRs are identified:

**Policy ENV-3.2:** Archaeological Resource Impact Mitigation. The City shall ensure appropriate and feasible mitigation for new development that has the potential to impact sites likely to contain archaeological, paleontological, cultural, or tribal resources.

**Policy ENV-3.3:** Protect Archaeological Resources. The City shall require any construction, grading, or other site altering activities cease if cultural, archaeological, paleontological, or cultural resources are discovered until a qualified professional has completed an evaluation of the site.

**Policy ENV-3.4:** Tribal Consultation. The City shall proactively engage local Native American tribes in the planning process, particularly when matters related to Native American culture, heritage, resources, or artifacts may be affected.

The proposed policies aim at protecting TCRs; however, future projects may encounter undiscovered TCRs, which could result in a potentially significant impact. Although development associated with implementation of Ukiah 2040 would likely occur within infill or previously developed sites, Mitigation Measure CR-2 in Section 4.5, *Cultural Resources*, would require archaeological resource studies for future projects within potentially sensitive areas, and implementation of further requirements to avoid or reduce impacts on those resources on a project-by-project basis. These measures, in tandem with current laws and CEQA regulations that outline measures and procedures for accidental discovery and require AB 52 consultation on a project-by-project basis, take into consideration the suggestions by Sherwood Valley. The project would not increase the likelihood for development that could affect TCRs, and all individual projects would adhere to federal, State, and local regulations. In addition, the City would implement Mitigation Measures TCR-1 and TCR-2 to avoid and properly treat TCRs with local Native American involvement.

## **Mitigation Measures**

Mitigation Measure CR-2 (see Section 4.5, *Cultural Resources*).

### *TCR-1      Avoidance of Tribal Cultural Resources*

When feasible, development facilitated by the project shall be designed to avoid known tribal cultural resources. Any tribal cultural resource within 60 feet of planned construction activities shall

be protected by establishing an Environmentally Sensitive Area (ESA) that would be fenced, or otherwise protected to ensure avoidance. The feasibility of avoidance of tribal cultural resources shall be determined by the City and applicants in consultation with local California Native American tribe(s).

*TCR-2      Unanticipated Discovery*

If previously unidentified tribal cultural resources are encountered during project implementation, altering the materials and their stratigraphic context shall be avoided and work shall halt immediately. Project personnel shall not collect, move, or disturb cultural resources. A representative from a locally-affiliated Native American Tribe shall be contacted to evaluate the resource and prepare a tribal cultural resources plan identifying methods necessary to protect the resource, in consultation with the City.

**Significance After Mitigation**

Implementation of Mitigation Measures CR-2, TCR-1, and TCR-2 would reduce potential impacts to TCRs from development facilitated by the project to less than significant levels by requiring avoidance and proper treatment of resources if found during unanticipated discovery.

## 4.13 Utilities and Service Systems

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This section summarizes the setting for utilities and service systems, including electricity, natural gas, telecommunication facilities, water, wastewater, storm drain facilities, and solid waste systems and analyzes the impacts related to utilities and service systems due to the project.

### 4.13.1 Setting

#### **a. Water Supply**

The City of Ukiah's Department of Public Works provides water (primarily sourced from wells) to much of the City. The City of Ukiah draws its water from the Russian River and four active groundwater wells that draw water from the Ukiah Valley Groundwater Basin (City of Ukiah 2020a, City of Ukiah 2020b). Groundwater wells account for approximately 55 percent of the City's potable water.

According to annual water quality testing report, the City of Ukiah's water quality is safe and reliable (City of Ukiah 2020a). The City's water service area comprises nearly 100 percent of the population residing within the City limits, with a small amount (less than 1 percent) of City residents being served by other water providers (City of Ukiah 2020b). Millview County Water District provides water to north Ukiah and an unincorporated area bordering the city to the north. Willow County Water District provides water to south Ukiah and an unincorporated area bordering the city to the south. Calpella County Water District provides water to the community of Calpella. All four agencies are expected to adequately meet existing and future demands for water, including in the event of a dry year or multiple dry years (City of Ukiah 2020b). During dry years, the City of Ukiah can purchase water from neighboring water systems: Millview County Water District and Willow County Water District.

The City's 2020 Urban Water Management Plan (UWMP) identifies the projected capacity and demand in 2040 (City of Ukiah 2020b). The City's water supply in 2040 is projected to be 21,184 acre-feet (AF) per year during normal conditions and 11,534 AF during single-dry year and multiple-dry year conditions (City of Ukiah 2020b).<sup>1</sup> In addition, the 2020 UWMP identifies that the City consumed a total of 3,030 AF of water in the year 2020 (City of Ukiah 2020b).<sup>2</sup>

#### **b. Wastewater**

Ukiah's Department of Public Works provides wastewater collection and treatment for approximately two-thirds of the City and operates its own wastewater treatment plant (WWTP). A separate agency, the Ukiah Valley Sanitation District (UVSD) serves the remaining portions of Ukiah, as well as communities in the existing SOI. Operated by the City, one WWTP serves both the City and UVSD. The City's 2020 UWMP identifies that the WWTP has a dry-weather capacity of 3.01 million gallons per day (mgd) and that in 2020, the WWTP collected a total of 2,671 acre-feet per year (AFY), which is equivalent to 2.4 mgd.

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<sup>1</sup> Tables 7.1, 7.2, and 7.6 in the City's 2020 UWMP summarize this information.

<sup>2</sup> Table 6.3 in the City's 2020 UWMP summarize this information.



### c. Stormwater Drainage

Stormwater discharges consist of surface water runoff generated from various land uses. The quality of these discharges varies and is affected by geology, land use, season, hydrology, and sequence and duration of hydrologic events. The Ukiah Department of Public Works manages the storm drainage system within the City. According to the 2012 Municipal Services Review, the capacity of the stormwater drainage system is unknown (Ukiah 2020a). Much of the city's stormwater is conveyed by surface flow along curbs and gutters. There are intermittent storm drains throughout the City; however, there is no central trunk line for all the storm drains to collect and convey stormwater to the Russian River.

### d. Electricity

Ukiah has its own Electric Utility Department that provides service to residents in the City. The City's Electric Utility Department is a municipally owned utility that maintains its own power-generating capabilities, such as the 3.5 Megawatt Lake Mendocino Hydroelectric Plant, which is one of the City's major sources of electricity (Ukiah 2020a).

### e. Natural Gas

The city is within Pacific Gas & Electric's (PG&E) natural gas service area (City of Ukiah 2020a). In 2020, PG&E customers consumed approximately 4.5 billion therms of natural gas. Nearly 45 percent of the natural gas burned in California was used for electricity generation, and much of the remainder consumed in the residential (21 percent), industrial (25 percent), and commercial (9 percent) sectors (California Energy Commission [CEC] 2022a, CEC 2022b). In Mendocino County residential users accounted for approximately 52 percent of PG&E's natural gas consumption (CEC 2022a). As shown in Table 4.13-1, Mendocino County (the smallest scale at which natural gas consumption data is readily available) consumed approximately 582 million US therms in 2022, which was approximately 13 percent of natural gas consumption by PG&E customers and 4.7 percent of statewide natural gas consumption (CEC 2022b, 2022c). In comparison, the population of Mendocino County is approximately 0.2 percent of California's population (DOF 2021).

**Table 4.13-1 2020 Natural Gas Consumption**

Energy Type	Mendocino County (millions of US therms)	PG&E (millions of US therms)	California (millions of US therms)	Proportion of PG&E Consumption <sup>1</sup>	Proportion of Statewide Consumption <sup>1</sup>
Natural Gas	582	4,508	12,332	13%	4.7%

<sup>1</sup> For reference, the population of Mendocino County (approximately 87,110 persons) is approximately 0.2 percent of California's population (39,466,855 persons) (DOF 2021).

Source: CEC 2022a, 2022b, DOF 2021

### f. Telecommunications

In California, approximately 98 percent of households have access to telecommunication infrastructure, including telephone and cable access (California Cable & Telecommunications Association 2022). Broadband and cellular services are provided to residents and businesses from a variety of private companies, including national retailers Comcast, AT&T, Verizon, and Sprint (Ukiah 2020a).

## **g. Solid Waste and Recycling**

Ukiah contracts its solid waste, recycling, and composting to the private company C&S Waste Solutions. Solid waste is transported to the Ukiah Valley Transfer Station, located at 3151 Taylor Drive in Ukiah. Unincorporated areas are served by Waste Management. According to California Department of Resources Recycling and Recovery (CalRecycle) the maximum permitted capacity for the Ukiah Transfer Station is 400 tons per day (CalRecycle 2022b). CalRecycle does not report an estimated capacity closing date for the facility. As of 2020 the facility receives an average of 120 to 130 tons per day (City of Ukiah 2020b).

### **4.13.2 Regulatory Setting**

#### **a. Federal Regulations**

##### **Clean Water Act**

The federal Clean Water Act, enacted by Congress in 1972 and amended several times since, is the primary federal law regulating water quality in the United States and forms the basis for several State and local laws throughout the country. The Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the U.S. Environmental Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the USEPA and U.S. Army Corps of Engineers. At the State and regional levels in California, the act is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCB).

Section 402 of the Clean Water Act requires that all construction sites on an acre or greater of land, as well as municipal, industrial and commercial facilities discharging wastewater or stormwater directly from a point source, such as a pipe, ditch, or channel, into a surface water of the United States must obtain permission under the National Pollutant Discharge Elimination System (NPDES) permit. All NPDES permits are written to ensure that the surface water receiving discharges will achieve specified water quality standards.

##### **Safe Drinking Water Act**

The Safe Drinking Water Act (SDWA) regulates public water systems that supply drinking water. The principal objective of the federal SDWA is to ensure that water from the tap is potable (safe and satisfactory for drinking, cooking, and hygiene). The main components of the federal SDWA are to:

1. Ensure that water from the tap is potable.
2. Prevent contamination of groundwater aquifers that are the main source of drinking water for a community.
3. Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 Code of Federal Regulations Section 144).
4. Regulate distribution systems.

## **Title 40 of the Code of Federal Regulations**

Title 40 of the Code of Federal Regulations, Part 258 (Resource Conservation and Recovery Act Subtitle D) contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design, groundwater monitoring, and closure of landfills.

## **Energy Independence and Security Act of 2007**

The Energy Independence and Security Act of 2007 set energy efficiency standards for lighting (specifically light bulbs) and appliances.

## **Energy Star Program**

Energy Star is a voluntary labeling program introduced by the USEPA to identify and promote energy-efficient products to reduce greenhouse gas emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specifications for maximum energy use established under the program are certified to display the Energy Star label. In 1996, the USEPA joined with the Energy Department to expand the program, which now also includes certifying commercial and industrial buildings as well as homes (USEPA 2022).

## **Telecommunications Act**

In 1996, the Federal Communications Commission (FCC) passed the Telecommunications Act, allowing any communications business to compete in any market against any other business. This act affects telephone service, cable programming, and other video services, including broadcast services and services provided to schools (FCC 2022).

## **b. State Regulations**

### **Water and Wastewater**

#### *Sustainable Groundwater Management Act*

In September 2014, the governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by the California Department of Water Resources.

#### *California Department of Water Resources*

The California Department of Water Resources is responsible for preparing and updating the California Water Plan, which is a policy document that guides the development and management of State water resources. The plan is updated every five years to reflect changes in resources and urban, agricultural, and environmental water demands. The California Water Plan suggests ways of managing demand and augmenting supply to balance water supply with demand.

### *Urban Water Management Planning Act*

In 1983 the California Legislature enacted the Urban Water Management Planning Act (Water Code Section 10610–10656). The Act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The Act requires that urban water suppliers adopt an UWMP at least once every five years and submit them to the California Department of Water Resources. Noncompliant urban water suppliers are ineligible to receive funding pursuant to Division 24, commencing with Section 78500, or Division 26, commencing with Section 79000, or receive drought assistance from the State until the UWMP is submitted and deemed complete pursuant to the Urban Water Management Planning Act.

### *Porter-Cologne Water Quality Control Act (California Water Code)*

The State of California is authorized to administer Federal or State laws regulating water pollution within the State. The Porter-Cologne Water Quality Control Act (Water Code Section 13000, *et seq.*) includes provisions to address requirements of the Clean Water Act. These provisions include NPDES permitting, dredge and fill programs, and civil and administrative penalties. The Porter-Cologne Act is broad in scope and addresses issues relating to the conservation, control, and utilization of the water resources of the State. Additionally, the Porter-Cologne Act states that the quality of all the waters of the State, including groundwater and surface water, must be protected for the use and enjoyment by the people of the State.

In California, the NPDES program is administered by the SWRCB through the RWQCB and requires municipalities to obtain permits that outline programs and activities to control wastewater and stormwater pollution. The federal Clean Water Act prohibits discharges of stormwater from construction projects unless the discharge is in compliance with an NPDES permit. The SWRCB is the permitting authority in California, and adopted an NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, otherwise known as the Construction General Permit (Order 2009-0009, as amended by Orders 2010-0014-DWQ and 2012-006-DWQ). The Order applies to construction sites that include one or more acre of soil disturbance. Construction activities include clearing, grading, grubbing, excavation, stockpiling, and reconstruction of existing facilities involving removal or replacement. The Construction General Permit requires that the landowner and/or contractor file permit registration documents prior to commencing construction and then pay a fee annually through the duration of construction. These documents include a notice of intent, risk assessment, site map, stormwater pollution prevention plan (SWPPP), and signed certification statement. The SWPPP must include measures to ensure that: all pollutants and their sources are controlled; non-stormwater discharges are identified and eliminated, controlled, or treated; site Best Management Practices (BMP) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges; and BMPs installed to reduce or eliminate pollutants after construction are completed and maintained. The Construction General Permit specifies minimum BMP requirements for stormwater control based on the risk level of the site. The Permit also specifies minimum qualifications for a qualified SWPPP developer and qualified SWPPP practitioner.

### *Title 22 of California Code of Regulations*

Title 22 regulates the use of reclaimed wastewater. In most cases only disinfected tertiary water may be used on food crops where the recycled water would come into contact with the edible

portion of the crop. Disinfected secondary treatment may be used for food crops where the edible portion is produced below ground and will not come into contact with the secondary effluent. Lesser levels of treatment are required for other types of crops, such as orchards, vineyards, and fiber crops.

The California Department of Public Health sets specific requirements for treated effluent reuse, or recycled water, through Title 22 of the California Code of Regulations. These requirements are primarily set to protect public health. The California Code of Regulations Title 22, Division 4, Chapter 3, Sections 60301 through 60355 are used to regulate recycled wastewater and are administered jointly by the California Department of Public Health and the RWQCBs. Title 22 contains effluent requirements for four levels of wastewater treatment, from un-disinfected secondary recycled water to disinfected tertiary recycled water. Higher levels of treatment have higher effluent standards, allowing for a greater number of uses under Title 22, including irrigation of freeway landscaping, pasture for milk animals, parks and playgrounds, and vineyards and orchards for disinfected tertiary recycled water.

## **Electricity and Natural Gas**

### *California Energy Commission*

As the State's primary energy policy and planning agency, the CEC collaborates with State and federal agencies, utilities, and other stakeholders to develop and implement State energy policies. Since 1975, the CEC has been responsible for reducing the State's electricity and natural gas demand, primarily by adopting new Building and Appliance Energy Efficiency Standards that have contributed to keeping California's per capita electricity consumption relatively low. The CEC is also responsible for the certification and compliance of thermal power plants 50 megawatts and larger, including all project-related facilities in California (CEC 2022c).

### *California Public Utilities Commission*

The CPUC regulates investor-owned electric and natural gas utilities operating in California. The energy work responsibilities of the CPUC are derived from the California State Constitution, specifically Article XII, Section 3 and other sections more generally, numerous State legislative enactments and various Federal statutory and administrative requirements. The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from PG&E and other natural gas utilities across California (CPUC 2022).

### *Senate Bill 350*

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires a doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

## **Solid Waste**

### *California Department of Resources Recycling and Recovery*

The California Department of Resources Recycling and Recovery (CalRecycle) oversees, manages, and monitors waste generated in California. CalRecycle provides limited grants and loans to help California cities, counties, businesses, and organizations meet the State waste reduction, reuse, and recycling goals. It also provides funds to clean up solid waste disposal sites and co-disposal sites,

including facilities that accept hazardous waste substances and non-hazardous waste. CalRecycle develops, manages, and enforces waste disposal and recycling regulations, including Assembly Bill (AB) 939 and SB 1016, both of which are described below.

#### *Assembly Bill 939*

AB 939 (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing and stimulate the purchase of recycled products.

#### *Senate Bill 1016*

SB 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, the Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. The Board is required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

#### *Assembly Bill 341 – Mandatory Commercial Recycling*

The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. AB 341 required all businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units to recycle by July 1, 2012. AB 341 also sets a statewide goal of 75 percent waste diversion.

### **c. Local Regulations**

#### **Municipal Stormwater Permitting Program**

RWQCBs issue stormwater discharge permits. The Phase I Municipal Separate Storm Sewer System (MS4) (Order R1-2015-0030) is applicable to the City of Ukiah in the North Coast Region RWQCB (RWQCB 2022). The MS4 programs implement and enforce BMPs to reduce the discharge of pollutants from municipal separate storm sewer systems. The MS4 requires the City to establish monitoring programs for outfalls, receiving water, and chronic toxicity.

#### **Ukiah Valley Basin Groundwater Sustainability Agency**

In 2017, the City came together with the County of Mendocino and other Ukiah Valley agencies to form the Ukiah Valley Basin Groundwater Sustainability Agency (UVBGS). The UVBGS was created by a Joint Powers Agreement to serve as the official Groundwater Sustainability Agency for the Ukiah Valley Basin required by the Sustainable Groundwater Management (SGMA) Act of 2014.



### 4.13.3 Impact Analysis

#### a. Significance Thresholds and Methodology

##### Significance Thresholds

In accordance with Appendix G of the *CEQA Guidelines*, a significant utilities impact would occur if new development facilitated by the proposed project would:

1. 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;
2. Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
3. 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;
4. Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

##### Methodology

This analysis considers the existing capacity of utilities serving the City, estimates qualitatively and quantitatively the potential additional demand on utilities, and identifies whether the existing system can serve the demand of the existing demand plus the project's estimated demand.

#### b. Project Impacts and Mitigation Measures

**Threshold 1:** Would the project 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?

**Impact U-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE DEMAND FOR WATER, WASTEWATER, ELECTRIC POWER, NATURAL GAS, TELECOMMUNICATIONS, AND STORMWATER DRAINAGE FACILITIES. HOWEVER, ADHERENCE TO UKIAH 2040 POLICIES WOULD FACILITATE EFFICIENT ENERGY USE, SUSTAINABLE AND RENEWABLE ENERGY, AND SAFE AND RESILIENT UTILITY AND INFRASTRUCTURE SYSTEMS THAT WOULD LESSEN THE NEED FOR NEW OR EXPANDED FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

Development facilitated by the project would create additional demand for water, wastewater, electricity, natural gas, telecommunication and stormwater drainage facilities.

Impact U-2 and U-3 consider the potential environmental effects related to water and wastewater infrastructure, pertaining to water supplies and WWTP capacity. In addition to water supply and WWTP capacity infrastructure, development facilitated by the project could require water and wastewater connections, such as pipes to the existing infrastructure. Similarly, development facilitated by the project could require stormwater drainage, electric power, natural gas, or

telecommunications facilities connections, such as pipes or lines the existing infrastructure. As discussed in Section 4.9, *Population and Housing*, one purpose of Ukiah 2040 is to direct future development in such a way to minimize the impacts of growth by emphasizing the intensification and reuse of already developed areas and redevelopment to infill areas. As such, by focusing growth within already built-out areas, development would occur in areas where they could connect to existing utilities, thereby minimizing potential environmental impacts.

In addition, as described in Section 2.7.7 in Chapter 2, *Project Description*, the City is proposing three separate annexation areas currently located in the County of Mendocino's jurisdictional boundaries. Once annexed, the Annexation Area A would continue to be used for agriculture, open space, or municipal uses. The potential for expansion of the WWTP in Annexation Area A is discussed in Impact U-3 below. Because Annexation Area A would continue to be used for agriculture, open space, or municipal uses, and no development is proposed, there would be no additional significant environmental effects from new or relocated utilities. Once annexed, Annexation Area B would be designated as Industrial and Agriculture, similar to existing County designations.

Annexation Area B is located adjacent to the City limits and within an area that has previously been developed and/or planned for development under the Ukiah Valley Area Plan. As such, any future utilities would connect to existing utilities, thereby minimizing potential environmental impacts. If new or expanded facilities are required in the future, additional CEQA would be performed on a project-level basis at that time.

Annexation Area C includes areas designated as Public, Low Density Residential, and Single-Family Residential - Hillside Overlay. Utilities would not be expanded or added to the areas designated as Public. Expansion of utilities to the 54-acre "Development Parcels" area designated for Single-Family Residential and Hillside Overlay District (-H) associated with the Ukiah Western Hills Open Land Acquisition and Limited Development Agreement Project were analyzed in an Initial Study and Mitigated Negative Declaration in 2021 (City of Ukiah 2021). Although not anticipated for the purpose of this analysis, if the remaining areas designated for Low Density Residential and Single-Family Residential – Hillside within Annexation Area C are proposed for development of single-family residences, utilities would need to be expanded to these areas. However, all construction in Hillside Overlay District would require discretionary review, even for development that would normally be ministerial, such as single-family homes, and project-level impacts would be analyzed at that time. Ukiah 2040 policies and mitigation measures identified throughout this EIR would apply to minimize impacts to the environment.

Regarding demands on energy utilities and as discussed in Section 4.16, *Effects Found Not to Be Significant*, proposed Ukiah 2040 policies include energy conservation and energy efficiency strategies. As described in Section 4.16, *Effects Found Not to Be Significant*, development facilitated by the project would not result in inefficient or wasteful use of energy. Furthermore, Ukiah 2040 contains the following proposed policies that would improve energy efficiency and energy sustainability, thereby reducing impacts on the environment.

**Goal PFS-6:** Improve the efficiency and quality of utility services in the city.

**Policy PFS-6.1:** New Initiatives. The City shall support innovative, sustainable, and alternative practices and technologies for delivering energy and utility services to the community.

**Policy PFS-6.2:** Undergrounding Utilities. The City shall encourage the conversion of overhead transmission and distribution lines to underground as economically feasible.

**Policy PFS-6.3: Energy Efficiency Education.** The City shall support education for residents and businesses on the importance of energy efficiency.

**Policy PFS-6.4: Energy Efficient Municipal Buildings.** The City shall require municipal and public buildings to operate at the highest energy efficiency level economically and operationally feasible.

**Policy PFS-6.5: Privately-Owned Building Retrofits.** The City shall promote retrofitting of privately-owned buildings to increase energy efficiency.

**Policy PFS-6.6: Local Power Generation.** The City shall support local power generation and production that is economically and operationally feasible.

**Goal PFS-7:** To ensure a safe and resilient utility and infrastructure system.

**Policy PFS 7.1: Resilient Electric Grid.** The City shall explore options for hardening the electric grid to continue to provide ongoing service to the community without disruption caused by natural (seismic events, flooding, wildfires, extreme wind events) or man-made hazards.

**Policy PFS 7.2: Vegetation Clearance.** The City shall require vegetation clearance and tree trimming adjacent to transmission and distribution lines and other critical electrical infrastructure.

**Policy PFS 7.3: Electric Infrastructure Upgrades.** The City shall implement electrical infrastructure upgrades as outlined in the Ukiah Wildfire Mitigation Plan to reduce the risk of wildfires.

**Goal PFS-8:** To transition to sustainable and renewable energy.

**Policy PFS 8.1: Utility Sustainability.** The City shall continue to expand alternative, sustainable electric energy use.

**Policy PFS 8.2: Sustainable Design and Energy Efficiency.** The City shall encourage the site planning and design of new buildings to maximize energy efficiency.

**Policy PFS 8.3: Solar Photovoltaic Use.** The City shall encourage solar photovoltaic systems for existing residential uses to reduce the reliance on the energy grid.

**Policy PFS 8.4: Residential Electric Appliances.** The City shall encourage the use of electric appliances and utility hook-ups in all new residential development.

**Policy PFS 8.5: LEED Certification.** The City shall encourage new construction, including municipal building construction, to achieve third-party green building certifications, such as LEED rating system, or an equivalent.

**Policy PFS 8.6: Incentivize Energy Efficiency.** The City shall consider providing incentives, such as prioritizing plan review, permit processing, and field inspection services, for energy efficient building projects.

In addition, Section 4.16.4 in Section 4.16, *Effects Found Not to Be Significant* identifies that the various regulations and proposed policies in Ukiah 2040 that would be required for future projects would ensure that drainage patterns are not substantially altered. Specifically, future projects under Ukiah 2040 would be required to implement low impact development (pursuant to proposed Policy PFS-5.1), which would minimize runoff and reduce the demand for additional stormwater infrastructure.

Overall, due to the location where future development would occur and with compliance with existing regulations and proposed Ukiah 2040 policies, impacts from water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities would be less than significant.

### Mitigation Measures

No mitigation measures would be required.

### Significance After Mitigation

Impacts would be less than significant without mitigation.

**Threshold 2:** Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

**Impact U-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE WATER DEMAND; HOWEVER, THE CITY HAS SUFFICIENT WATER SUPPLY TO SERVE THE PROJECT AND REASONABLY FORESEEABLE FUTURE DEVELOPMENT DURING NORMAL, DRY AND MULTIPLE DRY YEARS.**

Future growth and development facilitated by the project would create additional demand for water in Ukiah, as well as within the Annexation Areas. The water demand for the project was estimated using water demand rates for land use types developed by the California Emissions Estimator Model (CalEEMod). Each development type has its own associated water use factor by unit, which were used to calculate projected water demand volumes for each type of new development. In addition, the additional demand was based on the maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. As such, the projected water demand identified in Table 4.13-2 is a conservative assumption and water demand from Ukiah 2040 is expected to be lower than what is shown in that table.

**Table 4.13-2 Projected Total Water Demand by Development Type**

Development Type	Proposed Project Growth Forecast	Water Use Rate (MGY per unit) <sup>1</sup>	Projected Water Demand (MGY)	Projected Water Demand (gpd)	Projected Water Demand (AFY)
Non-residential	4,514,820 sf	0.29	1,309	3,586,301	4,017
Residential	2,350 units	0.11	259	709,589	795
<b>Total</b>			<b>1,568</b>	<b>4,295,890</b>	<b>4,812</b>

MGY = million gallons per year; gpd = gallons per day; AFY = acre-feet per year; sf = square feet

Note: Totals may not add due to rounding.

<sup>1</sup> Water use rates from CalEEMod. Indoor and outdoor water uses are combined. Rates for non-residential are based on the CalEEMod general office rate. Rates for non-residential are per 1,000 square feet.

With implementation of the project, water demand in 2040 would be the sum of the City's existing water demand and the projected water demand from the additional buildout associated with Ukiah 2040. As such, water demand in 2040, under the maximum buildout scenario, is conservatively estimated to be 7,842 AF.<sup>3</sup> As described in Section 4.13.1, the City's projected water supply would be 21,184 AF during normal years and 11,534 during a single-dry year and multiple-dry years. Therefore, sufficient water supplies would be available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts from the project would be less than significant.

In addition, Ukiah 2040 includes the following proposed goals and policies to reduce impacts on water supplies and encourage the conservation of water:

**Goal PFS-1:** To maintain a safe and adequate water system to meet the needs of existing and future development.

**Policy PFS-1.1:** Water Service Annexation Impacts. The City shall ensure newly annexed areas within the city do not negatively affect water services to existing customers.

**Policy PFS-1.2:** Russian River Water Rights. The City shall protect and confirm all Russian River tributary water rights to which the Ukiah Valley and City may be entitled.

**Policy PFS-1.3:** Consolidation of Water Districts. The City shall support the consolidation of water districts as part of future annexations to establish efficient services and ensure adequate water supply and delivery

**Policy PFS-1.4:** Water Storage. The City shall encourage the protection and expansion of existing sources and methods of water storage for future development.

**Policy PFS-1.5:** Recycled Water Project. The City shall explore the potential expansion of the Recycled Water Project to provide non-potable water to areas of large-scale urban irrigation, such as Todd Grove Park and the golf course.

**Policy PFS-1.6:** Reduce Reliance on the Russian River. The City shall continue to support the reduction on the reliance of surface water from the Russian River as a water source to serve the community.

**Policy PFS-1.7:** Groundwater Recharge. The City shall enhance groundwater supply by looking to expand its capacity to recharge by developing storm ponding and retention basins where feasible. In some areas these ponds or basins can be incorporated into a recreational area, used as wildlife habitat area, or may be required by new development to offset impacts associated with new nonpermeable surfaces.

**Goal PFS-2:** To maintain quality wastewater treatment and disposal services to meet the needs of existing and future development.

**Policy PFS-2.7:** Protect Groundwater Quality. The City shall preserve and protect groundwater quality through the implementation of best practices and innovative methods for modern wastewater disposal.

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<sup>3</sup> 7,842 AF = 3,030 AF (water demand in 2020) + 4,812 (water demand from Ukiah 2040)

These proposed goals and policies in Ukiah 2040 would assist the City in maintaining their water supply and water service for future use and development. These proposed goals and policies would help ensure a less than significant impact on the City's water supply.

### Mitigation Measures

No mitigation measures would be required.

### Significance After Mitigation

Impacts would be less than significant without mitigation.

**Threshold 3:** Would the project 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?

**Impact U-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE DEMAND FOR WASTEWATER TREATMENT. THE TIMING, INTENSITY, AND LOCATION OF AN EXPANSION OF WASTEWATER TREATMENT FACILITIES IS UNKNOWN AT THIS TIME, BUT AN EXPANSION WOULD REQUIRE ADDITIONAL CEQA REVIEW AND COMPLIANCE WITH EXISTING BUILDING AND ZONING CODES. AS SUCH, IMPACTS RELATED TO EXPANSION OF WASTEWATER TREATMENT FACILITIES AS A RESULT OF UKIAH 2040 WOULD BE LESS THAN SIGNIFICANT.**

The wastewater generation calculations for the development facilitated by the project are based on the estimated water demand described above under Impact U-2. Water demand is assumed to be 120 percent of wastewater generation, due to evaporation and system losses. As explained in Impact U-2, the water demand that was calculated for this project in this analysis is a conservative estimate based on a maximum buildout scenario. The wastewater generation calculation is based on this conservative estimate. As such, the estimated wastewater calculation is also a conservative estimate and wastewater generations from Ukiah 2040 is expected to be lower than what is described in this analysis.

The projected wastewater is conservatively estimated to be 4,010 AFY under the maximum buildout scenario.<sup>4</sup> This is equivalent to approximately 3.6 mgd.<sup>5</sup> In 2020, the City had an existing wastewater demand of approximately 2.4 mgd.<sup>6</sup> The total wastewater demand due to the project could be approximately, 6.0 mgd in 2040 in the maximum buildout scenario. The WWTP has a dry-weather capacity of 3.01 million gallons per day (Ukiah 2020b). As such, there is not currently sufficient capacity in the WWTP to accommodate the additional demand from the maximum buildout scenario in Ukiah 2040.

Nonetheless, Ukiah 2040 contains the following proposed goals and policies related to wastewater. Proposed Policy PFS-2.1 identifies that City will maintain an adequate level of service in the City's wastewater collection, treatment, and disposal system.

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<sup>4</sup> 4010 = 4812 / 1.2

<sup>5</sup> 3.6 mgd = (4,010 AFY \* 892.7 gallons per day) / 1,000,000 gallons

<sup>6</sup> 2.4 mgd = (2,671 AFY \* 892.7 gallons per day) / 1,000,000 gallons



**Goal PFS-2:** To maintain quality wastewater treatment and disposal services to meet the needs of existing and future development.

**Policy PFS-2.1:** Level of Service. The City shall maintain an adequate level of service in the City's wastewater collection, treatment, and disposal system to meet the needs of existing and projected development and all State and Federal regulations.

**Policy PFS-2.2:** Wastewater System Funding. The City shall ensure that the wastewater collection, treatment, and disposal system has adequate funds and programs for maintenance, upgrades when required, and day-to-day operations.

**Policy PFS-2.3:** Wastewater Service Coordination. The City shall coordinate with the Ukiah Valley Sanitation District to ensure ongoing wastewater treatment capacity within the wastewater treatment plant for future development.

**Policy PFS-2.4:** Ukiah Valley Sanitation District. The City should collaborate with Ukiah Valley Sanitation District to ensure adequate wastewater collection and treatment is provided to properties within City limits and their jurisdictional boundaries.

**Policy PFS-2.5:** Out of Area Service Agreements. The City shall require out of service area agreements in rural areas where the Ukiah Valley Sanitation District cannot feasibly provide wastewater services.

**Policy PFS-2.6:** Wastewater Service Capacity. The City shall ensure there is adequate wastewater service capacity prior to annexation of additional land.

The City has identified that additional wastewater treatment infrastructure is required to accommodate additional growth from Ukiah 2040 and the City plans to provide additional wastewater treatment capacity as described in Chapter 2, *Project Description*. Generally, wastewater treatment facilities would be allowed or permitted in areas containing Public land use designations. However, there are no new facilities proposed at this time. Generally, it is anticipated that construction of new facilities would result in similar physical impacts discussed throughout this EIR (i.e., impacts to biological resources, water quality and hydrology, air quality, agriculture, etc.), but impacts could also be reduced depending on location and intensity. As such, it is not possible to identify the specific nature, extent, and significance of physical impacts on the environment that could result from the construction and operation of an expanded WWTP without knowing the size and nature of the facility, or its location. Regardless, new facilities would require adherence to all applicable building and zoning codes, and additional CEQA review to analyze project and location specific impacts. The expansion of the WWTP would be subject to CEQA and CEQA review would be conducted when the WWTP expansion is advanced. As such, impacts from Ukiah 2040 related to wastewater facilities would be less than significant.

## **Mitigation Measures**

No mitigation measures would be required.

## **Significance After Mitigation**

Impacts would be less than significant without mitigation.

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| <p><b>Threshold 4:</b> Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?</p> <p><b>Threshold 5:</b> Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</p> |
|--|

**Impact U-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE VOLUME OF SOLID WASTE GENERATED IN UKIAH. HOWEVER, UKIAH 2040 CONTAINS POLICIES TO INCREASE RECYCLING AND COMPLY WITH FEDERAL, STATE, AND LOCAL MANAGEMENT REDUCTION REGULATIONS. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

Implementation of the project would generate additional solid waste. Construction of development facilitated by the project would create construction debris, such as scrap lumber and flooring materials. Operation of development facilitated by the project would create typical household wastes associated with residential, office, and commercial uses. Industrial development facilitated by the project would also generate solid waste.

As described in Section 4.13.1, *Setting*, the maximum permitted capacity for the Ukiah Transfer Station is 400 tons per day and as of 2020 the facility receives an average of 120 to 130 tons per day. Overall, the Ukiah Transfer Station has approximately between 270 and 280 tons per day of remaining capacity. Furthermore, CalRecycle estimates that the City of Ukiah generates approximately 5 pound of solid waste per day per person (CalRecycle 2022a).

This EIR identifies a maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. The maximum estimated population growth is 5,640 people (see Section 4.9, *Population and Housing*). Based on the average per capita solid waste disposal rate for the City, a total of approximately 28,200 pounds per day could be generated under the maximum buildout scenario in Ukiah 2040. This is equivalent to 14.1 tons per day. As such, there is sufficient capacity to serve the additional solid waste that would be generated in the maximum buildout scenario of Ukiah 2040.

In addition, Ukiah 2040 includes the following proposed goals and policies that focus on reducing solid waste generation and increasing recycling and composting, through the provision of adequate facilities:

**Goal PFS-3:** To ensure adequate solid waste, recycling, and composing services and maximize waste diversion from landfills.

**Policy PFS-3.1:** Solid Waste Diversion Targets. The City shall encourage increased community participation in recycling and composting programs and weekly collection of recyclables and organic waste to achieve 85 percent diversion for community waste and municipal operations by 2030.

**Policy PFS-3.2:** Waste Management Services. The City shall continue waste management service contracts to provide quality and cost-effective solid waste removal throughout the city and require all residents and businesses to comply with solid waste collection and recycling service requirements

**Policy PFS-3.3:** Construction and Demolition Waste. The City shall require all new development to comply with the current CALGreen requirements for construction and demolition waste diversion.

**Policy PFS-3.4:** Recycling Receptacles and Biodegradable/Recycled-Materials Products. The City shall require the availability of recycling and composting receptacles and use biodegradable or recycled-material products instead of single-use plastic products at all City facilities and City-sponsored events.

**Policy PFS-3.5:** Sustainable Purchasing Policy. The City shall prioritize purchasing products that are environmentally friendly; made with postconsumer recycled content; are recyclable, compostable, or reusable; are less toxic than conventional goods; are manufactured locally; and are fairly traded.

**Policy PFS-3.6:** Waste Reduction Education. The City shall collaborate and partner with local organizations to provide waste reduction education programs to residents and businesses.

**Goal ENV-9:** To become a zero-waste community through responsible procurement, waste diversion, and innovative strategies.

**Policy ENV-9.1:** Zero Waste. The City shall promote innovative activities that reduce waste and increase waste diversion, including sourcing products with reusable, recyclable, or compostable packaging; establishing food diversion programs; gasification, and promoting and educating on waste diversion and its importance.

**Policy ENV-9.2:** Household Waste Programs. The City shall provide convenient, easy-to-use bulky item and household hazardous waste programs that facilitate the reuse and recycling of materials.

These proposed goals and policies would require the reduction of solid waste generation and increase recycling efforts. Specifically, the policies under proposed Goal PFS-3 would ensure adequate solid waste services by requiring all new development to comply with the current CALGreen requirements for construction and demolition waste diversion and requiring the availability of recycling and composting receptacles and the provision of waste reduction education programs. Additionally, the policies under proposed Goal ENV-9 would encourage increased community participation in recycling and composting programs to achieve Ukiah's goal of becoming a zero-waste community. Furthermore, Ukiah 2040 does not contain any proposed policies that would encourage or allow non-compliance with any federal, state, or local management and reduction statutes and regulations related to solid waste. With adherence to these policies, impacts related to solid waste would be less than significant.

## **Mitigation Measures**

No mitigation measures would be required.

## **Significance After Mitigation**

Impacts would be less than significant without mitigation.

## 4.14 Wildfire

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This section summarizes the wildfire risks in and near the Planning Area and analyzes the impacts related to wildfire risks due to the project.

### 4.14.1 Environmental Setting

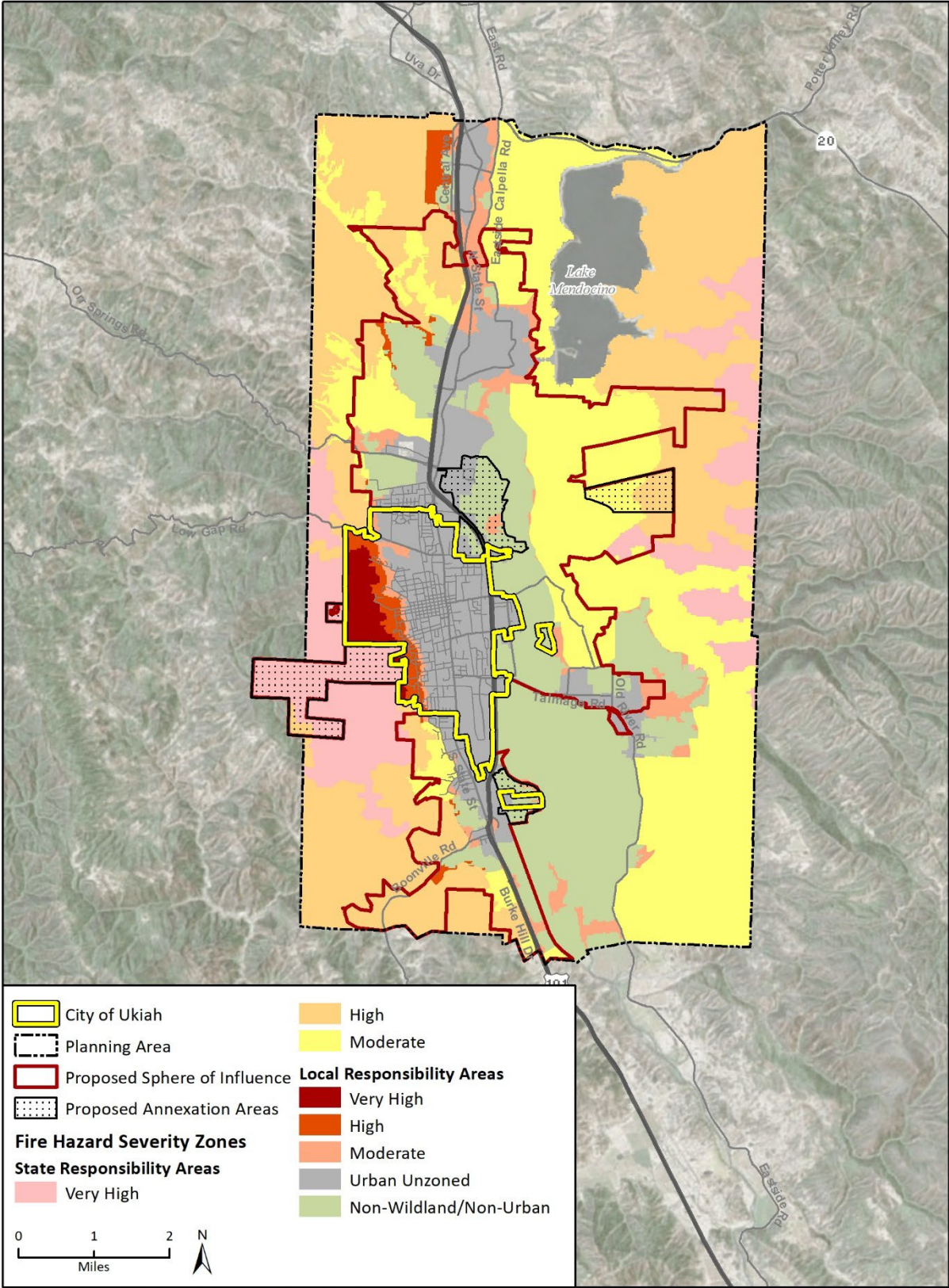
#### **a. Overview of Wildfire**

A wildfire is an uncontrolled fire in an extensive area of combustible vegetation. Wildfires differ from other fires in that they take place in areas of grassland, woodlands, brushland, scrubland, peatland, and other wooded areas that act as a source of fuel, or combustible material. Buildings may become involved if a wildfire spreads to adjacent communities. The primary factors that increase an area's susceptibility to wildfire include slope and topography, vegetation type and condition, and weather and atmospheric conditions. The Office of Planning and Research has recognized that although high-density structure-to-structure loss can occur, structures in areas with low- to intermediate-density housing were most likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access. Fire frequency also tends to be highest at low to intermediate housing density, at least in regions where humans are the primary cause of ignitions (California Natural Resources Agency 2018).

The indirect effects of wildfires can be catastrophic. In addition to stripping the land of vegetation and destroying forest resources, large, intense fires can harm the soil, waterways, and the land itself. Soil exposed to intense heat may lose its capability to absorb moisture and support life. Exposed soils erode quickly and enhance siltation of rivers and streams, thereby enhancing flood potential, harming aquatic life, and degrading water quality. Lands stripped of vegetation are also subject to increased debris flow hazards.

Previous large fires in the surrounding area have impacted Ukiah, including the 2018 Mendocino Complex Fire (Ranch Fire) which burned a total of 410,203 acres throughout Mendocino, Lake, Colusa, and Glenn Counties. The Ranch Fire started near Potter Valley, approximately 12 miles northeast of the Planning Area. Approximately 387 acres within Ukiah city limits is designated as a Very High Fire Hazard Severity Zone (FHSZ) in a Local Responsibility Area, and approximately 1,348 of Ukiah's existing Sphere of Influence (SOI) is within a Very High FHSZ in a State Responsibility Area, as established by the California Department of Forestry and Fire Protection (Cal Fire). Cal Fire has identified much of the region west of the Planning Area as moderate to high fire hazard severity zones, and areas to the north, east, and south as moderate fire hazard severity zones. The City boundary, existing and proposed sphere of influence (SOI), and Cal Fire severity zones are shown in Figure 4.14-1.

Figure 4.14-1 Fire Hazard Severity Zones in the Planning Area



Imagery and basemap data provided by Esri and its licensors © 2022.  
Additional data provided by Mendocino County and Cal Dept of Conservation, 2015; CAL FIRE, 2007.

FigX Wildfire 20220624

## **Slope and Aspect**

According to Cal Fire, sloping land increases susceptibility to wildfire because fire typically burns faster up steep slopes (Cal Fire 2000). Additionally, steep slopes may hinder firefighting efforts. Following severe wildfires, sloping land is also more susceptible to landslide or flooding from increased runoff during substantial precipitation events. Aspect is the direction that a slope faces, and it determines how much radiated heat the slope will receive from the sun. Slopes facing south to southwest will receive the most solar radiation. As a result, this slope is warmer and the vegetation drier than on slopes facing a northerly to northeasterly direction, increasing the potential for wildfire ignition and spread (Cal Fire 2000).

Generally, the urbanized area of Ukiah is located primarily to the east of Highway 101, with some urbanized area, mostly outside of city limits, to the west. Topography in Ukiah is generally flat (USGS 2015). Because Ukiah is primarily flat and not sloping, it has no distinguishable aspect. However, east and west of the city limits within the proposed SOI, there is steep sloping topography. While there are various sub-ridges and slopes in the hillside area outside of the City, the overall aspect is to the north or south.

## **Vegetation**

Vegetation is fuel to a wildfire and it changes over time with seasonal growth and die-back. The relationship between vegetation and wildfire is complex, but generally some vegetation is naturally fire resistant, while other vegetation is extremely flammable. It is worth noting that some plant types in California landscapes are fire resistant, while others are fire dependent for their seed germination cycles. Wildfire behavior depends on the type of fuels present, such as ladder fuels, surface fuels, and aerial fuels. Ladder fuels provide a path for a surface fire to climb upward into the crowns of trees; surface fuels include grasses, logs, and stumps low to the ground; and aerial fuels include limbs, foliage, and branches not in contact with the ground (Cal Fire 2022). Weather and climate conditions, including drought cycles, can lead to dry vegetation with low moisture content, increasing its flammability.

Vegetation cover within Ukiah, excluding landscaped lawns, includes a diverse range of plant species within terrestrial and aquatic habitat types, including riparian woodlands along the Russian River on the eastern edge of city limits, and oak woodlands to the west of the city. Vegetation cover in the City is described in Section 4.4, *Biological Resources*. Some of the vegetation in these habitats may present an increased risk to wildfires, including dry grasses on hillsides adjacent to the City. Dry grasslands and dead or diseased trees in the hillside area are highly susceptible to wildfire.

## **Weather and Atmospheric Conditions**

Wind, temperature, and relative humidity are the most influential weather elements in fire behavior and susceptibility (National Parks Service 2022). Fire moves faster under hot, dry, and windy conditions. Wind may also blow embers ahead of a fire, causing its spread. Drought conditions lead to extended periods of excessively dry vegetation, increasing the fuel load and ignition potential.

According to the National Oceanic and Atmospheric Administration (NOAA), most precipitation within the state is received from November through March, with an average annual rainfall of approximately 18 inches (NOAA 2022). May through September is the driest time of the year and coincides with what has traditionally been considered the fire season in California. However, increasingly persistent drought and climatic changes in California have resulted in drier winters, and fires during the autumn, winter, and spring months are becoming more common. Prevailing winds



in Ukiah vary, but generally travel north to south in the winter and west to east in the summer (WeatherSpark 2022).

## **b. Wildfire Hazards**

In California, responsibility for wildfire prevention and suppression is shared by federal, state, and local agencies. Federal agencies are responsible for federal lands in Federal Responsibility Areas. The State of California has determined that some non-federal lands in unincorporated areas with watershed value are of statewide interest and have classified those lands as State Responsibility Areas (SRA), which are managed by Cal Fire. All incorporated areas and other unincorporated lands are classified as Local Responsibility Areas (LRA).

While nearly all of California is subject to some degree of wildfire hazard, there are specific features that make certain areas more hazardous. Cal Fire is required by law to map areas of significant fire hazards based on fuels, terrain, weather and other relevant factors (Public Resources Code [PRC] 4201-4204 and California Government Code 51175-89). As described above, the primary factors that increase an area's susceptibility to fire hazards include slope, vegetation type and condition, and atmospheric conditions. Cal Fire maps fire hazards based on zones, referred to as FHSZs. Cal Fire maps three zones on SRA: 1) Moderate FHSZs; 2) High FHSZs; and 3) Very High FHSZs. Only the Very High FHSZs are mapped for LRA. Each of the zones influence how people construct buildings and protect property to reduce risk associated with wildland fires. Under state regulations, areas within Very High FHSZ must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life within these areas.

The City of Ukiah contains approximately 387 acres of Very High FHSZs in an LRA along the western city limits, and is bounded by a Very High FHSZ in an SRA to the west. The proposed SOI as part of Ukiah 2040 would contain Very High FHSZ in an SRA, as shown in Figure 4.14-1.

In 2003, Cal Fire constructed a shaded fuel break (north to south) along the base of the western hills along the entire length of the city to reduce fuel loads and protect the community from wildfire risk (Mendocino County Fire Safe Council 2022). A shaded fuel break is a forest management strategy used for mitigating the threat of wildfire leading to a dangerous buildup of combustible vegetation. The goal of a shaded fuel break is to thin the surface vegetation, conduct selective thinning, remove dead and down woody material, and remove ladder fuels to prevent a catastrophic fire and prevent the loss of structures. Maintenance was performed on the 100-foot wide, 2.6-mile fuel break in late 2018 and early 2019, with ongoing annual maintenance performed by the property owners and the City.

### **4.14.2 Regulatory Setting**

#### **a. Federal Regulations**

##### **The Disaster Mitigation Act of 2000**

The Disaster Mitigation Act of 2000 requires a state-level mitigation plan as a condition of disaster assistance. There are two different levels of state disaster plans: "Standard" and "Enhanced." States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act also established new requirements for local mitigation plans.

## **National Fire Plan**

The National Fire Plan was developed in August 2000, following a historic wildfire season. Its intent is to establish plans for active response to severe wildfires and their impacts to communities while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

### **b. State Regulations**

#### **California Board of Forestry**

The Board of Forestry maintains fire safe road regulations as part of Title 14 of the California Code of Regulations (CCR). This includes requirements for road width, surface treatments, grade, radius, turnarounds, turnouts, structures, driveways, and gate entrances with SRAs. These regulations are intended to ensure safe access for emergency wildland fire equipment and civilian evacuation.

#### **California Fire and Building Codes (2019)**

The California Fire Code is Chapter 9 of CCR Title 24. It establishes the minimum requirements consistent with nationally-recognized good practices to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structure, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of substances that may pose a threat to public health and safety. The California Fire Code regulates the use, handling and storage requirements for hazardous materials at fixed facilities. The California Fire Code and the California Building Code (CBC) use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines and specialized equipment. To ensure that these safety measures are met, the California Fire Code employs a permit system based on hazard classification. The provisions of this Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or appurtenances connected or attached to such building structures throughout California.

More specifically, the Fire Code is included in Title 24 of the CCR. Title 24, part 9, Chapter 7 addresses fire-resistances-rated construction; CBC (Part 2), Chapter 7A addresses materials and construction methods for exterior wildfire exposure; Fire Code Chapter 8 addresses fire related Interior finishes; Fire Code Chapter 9 addresses fire protection systems; and Fire Code Chapter 10 addresses fire related means of egress, including fire apparatus access road width requirements. Fire Code Section 4906 also contains existing regulations for vegetation and fuel management to maintain clearances around structures. These requirements establish minimum standards to protect buildings located in FHSZs within SRAs and Wildland-Urban Interface (WUI) Fire Areas. This code includes provisions for ignition-resistant construction standards for new buildings.

#### **Wildland-Urban Interface Building Standards**

On September 20, 2007, the Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending the CCR Title 24, Part 2, known as the 2007 CBC. These codes include provisions for ignition-resistant construction standards in the WUI.

Interface zones are areas with dense housing adjacent to vegetation that can burn and meeting the following criteria:

1. Housing density class 2 (one house per 20 acres to one house per 5 acres), 3 (more than one house per 5 acres to one house per acre), or 4 (more than one house per acre)
2. In Moderate, High, or Very High Fire Hazard Severity Zone
3. Not dominated by wildland vegetation (i.e., lifeform not herbaceous, hardwood, conifer, or shrub)
4. Spatially contiguous groups of 30-meter cells<sup>1</sup> that are 10 acres and larger

Intermix zones are housing development interspersed in an area dominated by wildland vegetation and must meet the following criteria:

1. Not interface
2. Housing density class 2
3. Housing density class 3 or 4, dominated by wildland vegetation
4. In moderate, high, or very high fire hazard severity zone
5. Improved parcels only
6. Spatially contiguous groups of 30-meter cells 25 acres and larger

Influence zones have wildfire-susceptible vegetation up to 1.5 miles from an interface zone or intermix zone.

## **The California Fire Plan**

The Strategic Fire Plan for California is the State's road map for reducing the risk of wildfire. The most recent version of the Plan was adopted in January 2019 and directs each Cal Fire Unit to revise and update its locally-specific Fire Management Plan (Cal Fire 2018). These plans assess the fire situation within each of the 21 Cal Fire units and six contract counties. These plans address wildfire protection areas, initial attack success, assets and infrastructure at risk, pre-fire management strategies, and accountability within their geographical boundaries.

## **California Office of Emergency Services**

The California Office of Emergency Services (CalOES) prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Disaster Mitigation Act of 2000 for the State to receive Federal funding. The Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance.

## **State Emergency Plan**

The foundation of California's emergency planning and response is a statewide mutual aid system which is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555–8561) requires signatories to the agreement to prepare operational plans to

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<sup>1</sup> Note that "30-meter cells" refers to raster data, and indicates data is presented as 30-meter by 30-meter squares.

use within their jurisdiction, and outside their area. These plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all State agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

Section 8568 of the California Government Code, the “California Emergency Services Act,” states that “the State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof.” The Act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager. The provisions of the act are further reflected and expanded on by appropriate local emergency ordinances. The Act further describes the function and operations of government at all levels during extraordinary emergencies, including war.

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California’s Standardized Emergency Management System (SEMS), which is the system required by Government Code 8607(a) for managing emergencies involving multiple jurisdictions and agencies (CalOES 2022). The SEMS incorporates the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination. Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs. The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and state. CalOES divides the state into several mutual aid regions. The Planning Area is located in Mutual Aid Region II, which includes Del Norte, Humboldt, Mendocino, Sonoma, Lake, Napa, Marin, Solano, Contra Costa, San Francisco, San Mateo, Alameda, Santa Clara, Santa Cruz, San Benito, and Monterey Counties (CalOES 2019).

### **Government Code Sections 65302 and 65302.5, Senate Bill 1241 (Kehoe) of 2012**

Senate Bill (SB) 1241 requires cities and counties to address fire risk in SRAs and Very High FHSZs in the safety element of their general plans. The bill also directed amendments to the CEQA Guidelines Appendix G environmental checklist to include questions related to fire hazard impacts for projects located in or near lands classified as SRAs and Very High FHSZs.

### **California Public Utilities Commission General Order 166**

General Order 166 Standard 1.E requires that investor-owned utilities develop a Fire Prevention Plan which describes measures that the electric utility will implement to mitigate the threat of power-line fires generally. Additionally, this standard requires that investor-owned utilities outline a plan to mitigate power line fires when wind conditions exceed the structural design standards of the line during a Red Flag Warning in a high fire threat area. Fire Prevention Plans created by investor-owned utilities are required to identify specific parts of the utility’s service territory where the conditions described above may occur simultaneously. Standard 11 requires that utilities report annually to the California Public Utilities Commission (CPUC) regarding compliance with General Order 166 (CPUC 2017). In compliance with Standard 1.E of this General Order, Pacific Gas and Electric Company adopted a Fire Prevention Plan dated October 31, 2018.

## **c. Regional and Local Regulations**

### **Mendocino County Multi-Jurisdictional Hazard Mitigation Plan**

The Mendocino County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), adopted by the City of Ukiah in 2021, identifies effective and feasible actions to reduce the risks posed by potential hazards in Mendocino County and the jurisdictions within the county, including the City of Ukiah. The City of Ukiah Jurisdictional Annex within the MJHMP assesses various risks from hazards such as climate change, drought, flooding, earthquakes and geologic hazards, extreme weather, pandemic diseases, and wildfire; lists mitigation actions; and describes the process of implementing, monitoring, and evaluating the plan. Wildfire is considered a high-priority, countywide threat (County of Mendocino 2021).

### **City of Ukiah Emergency Operation Plan**

The City of Ukiah Emergency Operation Plan, adopted in May 2021, is designed to ensure continuity of essential services operations during an emergency or disaster. The plan specifies the policies, roles, resources, and actions necessary to managing a local emergency, including those related to wildfire events. The plan is consistent with federal and state laws governing emergency response planning and adopts the National Incident Management System (City of Ukiah 2021).

### **Ukiah City Code**

Ukiah City Code Section 3000 adopts the 2019 California Building Standards Code, Title 24, Part 9, California Fire Code. The California Fire Code contains regulations consistent with nationally-recognized and accepted practices for safeguarding life and property from hazards of fire and explosion; dangerous conditions arising from the storage, handling, and use of hazardous materials; and hazardous conditions in the use or occupancy of buildings. Additionally, although properties within the City limits are not located within an SRA, the City of Ukiah (Ukiah City Code Section 5200) has adopted the SRA regulations for lands within the City limits located in High or Very High FHSZs. This includes development standards contained within Public Resources Code Sections 4290 and 4291, which are designed to provide defensible space and fire protection for new construction and ensure adequate emergency access: increased property line setbacks for all applicable construction; on-site water storage for fire protection, driveway/roadway types and specifications based on designated usage; all weather driveway/roadway surfaces being engineered for 75,000 pound vehicles; maximum slope of 16 percent; turnout requirements; gate requirements and setbacks, parking standards, fuels reduction regulations, etc.

Additionally, the Hillside Overlay District (which also generally overlaps with Very High FHSZs) includes strict development standards for residential development relating to fire hazards, including increased setbacks, the restriction of using combustible roof materials, water and fire hydrant requirements, slope requirements, etc. All construction in this district also requires discretionary review, even for development that would normally be ministerial, such as single-family homes.

### 4.14.3 Impact Analysis

#### a. Thresholds and Methodology

The following thresholds of significance are based on Appendix G to the CEQA Guidelines. For purposes of this EIR, since the Planning Area is within two miles of an SRA, implementation of the project may have a significant adverse impact if it would do any of the following:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan;
2. 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;
3. 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;
4. 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 changes; or
5. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

The assessment of impacts related to wildfire hazards and risks were evaluated using FHSZ mapping, aerial imagery, and topographic mapping. Weather patterns related to prevailing winds and precipitation trends were evaluated as they relate to the spread and magnitude of wildfire. CEQA does not generally require an agency to consider the effects of existing environmental conditions on a project's future users or residents. Consequently, impacts under the thresholds identified below would only be considered significant if the project risks exacerbating those existing environmental conditions.

#### b. Project Impacts and Mitigation Measures

**Threshold 1:** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

**Impact WFR-1 BUILDOUT OF THE PROJECT COULD RESULT IN NEW DEVELOPMENT IN VERY HIGH FHSZs. HOWEVER, EXISTING LOCAL AND STATE REGULATIONS, AND UKIAH 2040 PROPOSED POLICIES ADDRESS EMERGENCY PLANNING, MANAGEMENT, ACCESS, AND EDUCATION; AS WELL AS ENFORCE MAINTAINING AN EMERGENCY MANAGEMENT PLAN. THESE REGULATIONS AND PROPOSED POLICIES WOULD ADDRESS ISSUES RELATED TO ACCESS AND EMERGENCY RESPONSE AND THE PROJECT WOULD NOT IMPAIR AN EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

Development facilitated by the project could introduce new residents or employees who would require emergency response evacuation in the case of a wildfire. The Safety Element of Ukiah 2040 includes proposed goals and policies to ensure safe and efficient evacuation and emergency response. Applicable goals and policies are as follows:

**Goal SAF-4:** To maintain adequate and effective fire protection services for Ukiah.



**Policy SAF-4.1:** Fire Service Rating. The City shall optimize the [Insurance Services Officer] ISO ratings of the Ukiah Valley Fire Authority to Class 1 by prioritizing agency needs and balancing cost/quality trade-offs.

**Goal SAF-5:** To minimize wildland fire risk to project life and property.

**Policy SAF-5.3:** Evacuation Routes. The City shall identify and maintain adequate evacuation routes in the city to safeguard human life in the case of fire.

**Policy SAF-5.4:** Roadway Vegetation Clearance. The City shall maintain an adequate vegetation clearance on public and private roads to mitigate wildfire hazards.

**Policy SAF-5.10:** Fire Safety Education Programs. The City shall coordinate with the Ukiah Valley Fire Authority to inform property owners and residents of the most recent best practices in building and land management and fire safety measures to protect people and property from fire hazards.

**Goal SAF-6:** To ensure that the City is adequately prepared for emergencies of any variety through effective planning measures.

**Policy SAF-6.1:** Evacuation Routes. The City shall coordinate with the Ukiah Valley Fire Authority to review, update, and periodically exercise emergency access, protocols, and evacuation routes to assess their effectiveness.

**Policy SAF-6.2:** Hazard Mitigation Plan. The City shall continue to participate in and implement the Mendocino County Hazard Mitigation Plan to ensure maximum preparedness for hazard events.

**Policy SAF-6.3:** Locally Focused Plans. The City shall maintain and implement locally focused plans, including an Emergency Operations Plan, to maintain consistency with State and Federal requirements.

Policies listed above direct the City to ensure effective and coordinated response to disasters, which would include events warranting evacuation. Ukiah 2040 also includes proposed policies that support improved preparation and response through public education and ensuring adequate access in reference to wildfires through Policies SAF-4.1 and SAF-5.10. These proposed goals and related policies in the Safety Element of Ukiah 2040 would ensure adequate emergency response and evacuation.

The City of Ukiah Jurisdictional Annex of the MJHMP includes several mitigation actions related to maintaining emergency response and evacuation plans. Mitigation Action DF-MCOE-256 encourages development of a disaster warning system to disseminate warnings and information across Mendocino County. Further, Mitigation Action EQ-MCOE-254 encourages the Mendocino County Office of Education to draft and adopt an emergency operations plan to identify alternative transportation routes in case of a natural disaster. These mitigation actions would ensure that residents are prepared to react to a wildfire emergency and would have advance notice to evacuate. The project would be consistent with these actions by supporting them with Ukiah 2040 goals and policies.

The City of Ukiah Emergency Operation Plan outlines emergency response priorities for a variety of emergency situations, including wildfire. In the event of a wildland/urban interface fire, the plan guides the City in determining the nature and extent of the fire, assessing and activating evacuation

orders, and establishing communication with impacted areas. The project would be consistent with this plan by supporting it with the Ukiah 2040 goals and policies listed above.

In addition, the Ukiah Valley Fire Authority reviews and approves development projects to ensure that emergency access standards are met, and therefore development facilitated by the project would be reviewed to ensure that it does not hinder emergency access or evacuation.

Specific to residential construction within Very High FHSZs, future residential construction within the proposed Hillside Overlay District would require discretionary review. Specifically, residential units would not be developed until an applicant submits a project-specific site plan with a Use Permit application and receives Planning Commission approval for development of their residence, in accordance with the Hillside Overlay District regulations. The Hillside Overlay District includes strict development standards relating to fire hazards including increased setbacks, the restriction of using combustible roof materials, water and fire hydrant requirements, slope requirements, etc. The Use Permit process for construction within the Hillside Overlay District would provide another layer of review for safety standards related to wildfire that would otherwise not be required for by-right housing within the western hills.

Lastly, implementation of Ukiah 2040 policies and actions associated with emergency planning and response, in addition to adherence to MJHMP Mitigation Actions and fire department review, would ensure that potential impacts from implementation of the project on emergency response and evacuation would be less than significant.

### **Mitigation Measures**

No mitigation measures would be required.

### **Significance After Mitigation**

Impacts would be less than significant without mitigation.

- |                     |   |
|---------------------|---|
| <b>Threshold 2:</b> | If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?   |
| <b>Threshold 3:</b> | If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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? |
| <b>Threshold 4:</b> | If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?   |
| <b>Threshold 5:</b> | Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?  |

**Impact WFR-2 THE PROJECT ENVISIONS POTENTIAL FUTURE DEVELOPMENT ON SITES THAT ARE IN OR NEAR MODERATE, HIGH, AND VERY HIGH FHSZs. DEVELOPMENT FACILITATED BY THE PROJECT WOULD EXPOSE PROJECT OCCUPANTS AND STRUCTURES TO WILDFIRE RISKS FOR SITES LOCATED IN OR NEAR SRAS OR VERY HIGH FHSZs. WILDFIRE RISK WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

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There are approximately 387 acres of Very High FHSZ within the city limits of Ukiah, and approximately 2,670 acres of Very High FHSZ within the city's existing SOI. The proposed SOI and annexation areas would add approximately 880 acres of Very High FHSZ to city limits and its SOI. As shown in Figure 4.14-1, the Very High FHSZ would be primarily located in the hills west of the city, west of the existing Very High FHSZ within city limits.

Development facilitated by Ukiah 2040 would include increased residential densities and building intensities for certain land use designations, compared to existing density and intensity. This EIR identifies a maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. The following estimate of growth is a conservative estimate based on the maximum buildout scenario. Development of the project in the maximum buildout scenario is estimated to result in approximately 2,350 housing units and an additional 4,514,820 square feet of commercial areas.

As noted in Impact WFR-1 above, new development within or near High or Very High FHSZs would be limited to the areas in the western hills of the City where the Hillside Residential and Low Density Residential land use designation would be applied. The Hillside Overlay district (-H) is applied to these lands within the western hills and there would be density restrictions in these areas to address fire concerns. As such, any future development would be limited to a low density (generally 1 dwelling unit per acre). In addition, any future development would be required to adhere to the Ukiah City Code, which has adopted the SRA regulations for lands within the City limits located in High or Very High FHSZs, as described in the *Ukiah City Code* subsection in Section 4.14.2, *Regulatory Setting*.

The proposed annexation areas would add additional Very High FHSZ areas to the city. As described in Section 2, *Project Description*, the project proposes to include Annexation Areas A, B and C. Most

of Annexation Area A and all of Annexation Area C would be located in a High or Very High FHSZ; however, most of these Annexations Areas are associated with a Public land use designation and no buildout is expected in these areas. A portion of Annexation Area C is designated as Hillside Residential and could potentially result in development of residences at a low density and would be required to adhere to the same regulations described above. Annexation Area B is not within a FHSZ.

Growth facilitated by the project would occur primarily as infill and redevelopment within the urbanized areas of Ukiah. Therefore, most roads and utility infrastructure required for growth facilitated by the project would be existing or would occur in currently developed areas. However, a small amount of low density development facilitated by the project could occur in FHSZs, and the installation or maintenance of roads and utility lines may exacerbate existing fire risks in the city or its SOI.

The Safety Element of Ukiah 2040 includes proposed goals and policies to related to prevention, minimization, and mitigation of wildfire risks. Applicable goals and policies include the following as well as Policies SAF-5.3, SAF-5.4, and SAF-5.5 identified in Impact WFR-1:

**Goal SAF-5:** To minimize wildland fire risk to project life and property.

**Policy SAF-5.1:** Public Facilities Hazard Mitigation. The City shall reduce hazard potential for public facilities located in the Very High Fire Hazard Severity Zone by requiring the incorporation of hazard mitigation measures during planned improvements.

**Policy SAF-5.2:** Vegetation and Fuel Management. The City shall require that structures located in the Very High Fire Hazard Severity zone maintain the required hazardous vegetation and fuel management specified within the California Fire Code.

**Policy SAF-5.5:** Fuel Breaks. The City shall prioritize increasing funding for and the maintenance of appropriate fuel breaks, reductions, and pest management in high fire hazard areas to prevent the spread of fire and limit potential damages.

**Policy SAF-5.6:** Water Supply Infrastructure. The City shall regularly assess the integrity of existing water supply infrastructure and prioritize required system.

**Policy SAF-5.7:** Fire Code Compliance. The City shall require that all new or significantly renovated structures and facilities within Ukiah comply with local, State, and Federal regulatory standards including the California Building and Fire Codes as well as other applicable fire safety standards.

**Policy SAF-5.8:** Site Design Standards for Fire Hazard Reduction. The City shall prioritize the maintenance and update of stringent site design standards to reduce potential fire hazard risk.

**Policy SAF-5.9:** Adequate Water Supply Infrastructure. The City shall prioritize new development in areas with adequate water supply infrastructure.

Proposed goals and policies of the Safety Element would reduce the risk of loss of life, injury, and property loss from wildfires. New construction would also be subject to the California Fire Code, which includes safety measures to minimize the threat of fire, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system and sealing any gaps around doors, windows, eaves, and vents to prevent intrusion by flame or embers. Fire sprinklers would be required in residential developments (with some exceptions) pursuant to Ukiah City Code. Construction would also be required to meet

CBC requirements, including CCR Title 24, Part 2, which includes specific requirements related to exterior wildfire exposure. The Board of Forestry, via CCR Title 14, sets forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent loss of structures or life by reducing wildfire hazards. The codes and regulations would reduce the risk of loss, injury, or death from wildfire for new residential developments facilitated by the project, but not entirely.

Existing codes and regulations and Ukiah 2040 proposed goals and policies cannot fully prevent wildfires from damaging structures or occupants. The project would increase the exposure of new residential development to risk of loss or damage from wildfire, which would be a significant impact. Therefore, Mitigation Measure WFR-1 would be required to reduce the risk of wildfire during project construction for development facilitated by the project. Mitigation Measure WFR-2, which includes development siting considerations, would apply to development facilitated by the project.

## **Mitigation Measures**

### *WFR-1 Construction Wildfire Risk Reduction*

The City shall require the following measures during project construction:

1. Construction activities with potential to ignite wildfires shall be prohibited during red-flag warnings issued by the National Weather Service for the site. Example activities include welding and grinding outside of enclosed buildings.
2. Fire extinguishers shall be available onsite during project construction. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher.
3. Construction equipment powered by internal combustion engines shall be equipped with spark arresters. The spark arresters shall be maintained pursuant to manufacturer recommendations to ensure adequate performance.

At the City's discretion, additional wildfire risk reduction requirements may be required during construction. The City shall review and approve the project-specific methods to be employed prior to building permit approval.

### *WFR-2 Project Design Wildfire Risk Reduction*

Prior to finalizing site plans, proposed structure locations shall, to the extent feasible given site constraints, be located outside of known landslide-susceptible areas and located at least 50 feet from sloped hillsides. Project landscape plans shall be encouraged to include fire-resistant vegetation native to Mendocino County and/or the local microclimate of the site and prohibit the use of fire-prone species especially non-native, invasive species. Should the project meet the above criteria, no additional measures are necessary. Should the location be within a known landslide area or within 50 feet of a sloped hillside, structural engineering features shall be incorporated into the design of the structure to reduce the risk of damage to the structure from post-fire slope instability resulting in landslides or flooding. These features shall be recommended by a qualified engineer and approved by the City prior to the building permit approval.

## **Significance After Mitigation**

The development that could be facilitated by Ukiah 2040 and located within High or Very High FHSZs would be limited to low density residential. In addition, any of this future development would be required to adhere to the Ukiah City Code, which has adopted the SRA regulations for lands within the City limits located in High or Very High FHSZs, as described in the *Ukiah City Code* subsection in Section 4.14.2, *Regulatory Setting*. Furthermore, with implementation of mitigation measures WFR-1 and WFR-2, the risk of loss of structures and the risk of injury or death due to wildfires would be reduced. These measures would make structures more fire resistant and less vulnerable to loss in the event of a wildfire. These measures would also reduce the potential for construction to inadvertently ignite a wildfire. Considering that future development within high or Very High FHSZs would be limited to low density residential; that the City has adopted the SRA regulations; that future projects in these areas would require discretionary review; and that Mitigation Measures WFR-1 and WFR-2 would be implemented, it is expected that impacts related to wildfire would be less than significant with mitigation.



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## 4.15 Paleontological Resources

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This section summarizes the potential to encounter paleontological resources in the City and Annexation Areas and analyzes the impacts on paleontological resources due to the project.

### 4.15.1 Setting

#### **a. Regional Setting**

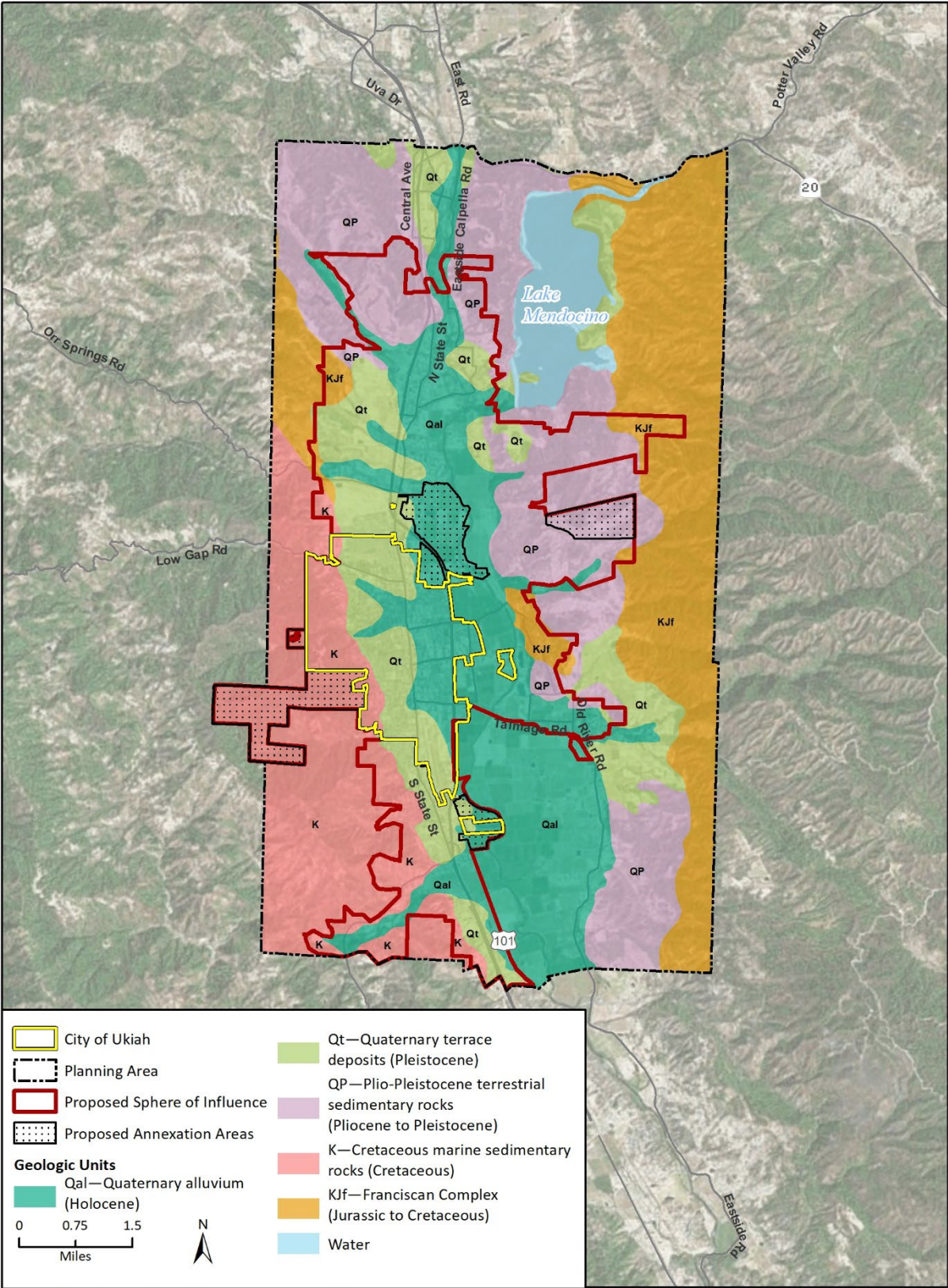
Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and their traces (e.g., trackways, imprints, burrows, etc.). Paleontological resources are not found in “soil” but are contained within the geologic deposits or bedrock that underlies the soil layer. Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they are discovered during construction of a development project.

The City of Ukiah is in the Coast Ranges geomorphic province, one of the eleven geomorphic provinces of California (California Geological Survey 2002). The Coast Ranges extend along the majority of California’s coast from the California-Oregon border to Point Arguello in Santa Barbara County in the south and consist of northwest-trending mountain ranges and valleys. The Coast Ranges are composed of Mesozoic and Cenozoic sedimentary, igneous, and metamorphic strata. The eastern side is characterized by strike-ridges and valleys in the Upper Mesozoic strata. The Coast Ranges province runs parallel to and overlaps the San Andreas Fault in some areas of California Geological Survey 2002).

#### **b. Local Setting**

Locally, the City of Ukiah lies within the Ukiah Valley, along the Russian River in Mendocino County. The regional geology was mapped at a scale of 1:250,000 by Jennings and Strand (1960), who identified five geologic units underlying the City, Annexation Area, and proposed sphere of influence (SOI): Quaternary alluvium, Quaternary terrace deposits, Plio-Pleistocene sedimentary rocks, Cretaceous marine sedimentary rocks, and the Franciscan Complex (Figure 4.15-1). Part of area was mapped at a scale of 1:24,000 by Delattre and Rubin (2020), who provided names and subdivisions of some of the geologic units mapped by Jennings and Strand (1960). The interpretations of Delattre and Rubin (2020) are used to aid the assessment of the paleontological sensitivity when applicable.

Figure 4.15-1 Geologic Map of the Planning Area



Imagery and basemap data provided by Esri and its licensors © 2022.  
Additional data provided by City of Ukiah, 2022 and Jennings and Strand, 1960.

Fig X Geologic Map

## **Quaternary Alluvium**

Quaternary alluvium underlies the majority of the Planning Area, including the City and proposed SOI, in the low-lying areas along the Russian River and its tributary creeks (Figure 4.15-1). Per Delattre and Rubin (2020), Quaternary alluvium includes various Holocene-aged deposits including floodplain deposits, active stream channel deposits, alluvial fan deposits, and artificial fill. These various sediment types generally consist of loose to moderately consolidated, gravel, sand, and silt (Jennings and Strand 1960; Delattre and Rubin 2020). Due to its Holocene age, Quaternary alluvium is generally considered too young (i.e., less than 5,000 years old) to preserve paleontological resources (SVP 2010). Therefore, Quaternary alluvium has low paleontological sensitivity.

## **Quaternary Terrace Deposits**

Quaternary terrace deposits underlie portions of the Planning Area, including the City and the proposed SOI (Figure 4.15-1). Areas mapped as Quaternary terrace deposits by Jennings and Strand (1960), are divided by Delattre and Rubin (2020) into older alluvial fan deposits, older alluvial deposits, and very old alluvial terrace deposits. Older alluvial fan deposits consist of grayish brown, consolidated, poorly sorted, gravel, sand, and silt, and are early Holocene to late Pleistocene in age. Older alluvial deposits consist of slightly consolidated gravelly sand and silt representing stream and floodplain deposits that are early Holocene to late Pleistocene in age. Very old alluvial terrace deposits consist of moderately to well-cemented, poorly sorted, silty or clayey sand and gravel that are Pleistocene in age. All these sediment types represent early Holocene to Pleistocene alluvial deposits, so their paleontological potential can be assessed together. No significant fossil localities are known from Pleistocene alluvial deposits in Mendocino County, but similar sediments in nearby Lake and Sonoma Counties have produced fossils such as mastodon (*Mammut*), ground sloth (*Nothrotheriops*, *Paramylodon*), horse (*Equus*), bison (*Bison*), camel, deer, and plants (Jefferson 2010; Paleobiology Database [PBDB] 2022; University of California Museum of Paleontology [UCMP] 2022). Given the fossil-producing history of similar sediments in this region of California, Quaternary terrace deposits have high paleontological sensitivity.

## **Plio-Pleistocene Sedimentary Rocks**

Plio-Pleistocene rocks underlie portions of the Planning Area, including the proposed SOI (Figure 4.15-1). Areas mapped as Quaternary terrace deposits by Jennings and Strand (1960), are divided by Delattre and Rubin (2020) into older alluvial fan deposits, very old alluvial terrace deposits, and the Ukiah Formation. Older alluvial fan deposits consist of grayish brown, consolidated, poorly sorted, gravel, sand, and silt, and are early Holocene to late Pleistocene in age. Very old alluvial terrace deposits consist of moderately to well-cemented, poorly sorted, silty or clayey sand and gravel that are Pleistocene in age. No significant fossil localities are known from Pleistocene alluvial deposits in Mendocino County, but similar sediments in nearby Lake and Sonoma Counties have produced fossils such as mastodon (*Mammut*), ground sloth (*Nothrotheriops*, *Paramylodon*), horse (*Equus*), bison (*Bison*), camel, deer, and plants (Jefferson 2010; PBDB 2022; UCMP 2022). The Ukiah Formation consists of bluish gray (when fresh) or yellowish brown (when oxidized), well-consolidated, moderately bedded, pebble to cobble conglomerate composed of subrounded to rounded clasts with interbedded sandstone and siltstone that is early Pleistocene to Pliocene in age. No fossil localities have been reported from the Ukiah Formation (PBDB 2022; UCMP 2022), and the coarse-grained nature of the Ukiah Formation is likely not conducive to fossil preservation. However, given that the areas mapped as Plio-Pleistocene

sedimentary rocks include geologic units with a history of producing significant paleontological resources, Plio-Pleistocene sedimentary rocks are assigned high paleontological sensitivity.

### **Cretaceous Marine Sedimentary Rocks and Franciscan Complex**

Cretaceous marine sedimentary rocks underlie the western area of Planning Area, including the western areas of the City and proposed SOI. The Franciscan Complex underlies the eastern edge of the Planning Area, including the proposed SOI (Figure 4.15-1). Per Delattre and Rubin (2020), both of these geologic units represent rocks of the Franciscan Complex. The Franciscan Complex is a Jurassic to Cretaceous-aged assemblage primarily comprised of marine sedimentary, metamorphic, and volcanic rocks (Delattre and Rubin 2020; Jennings and Strand 1960). Within the proposed SOI, Franciscan Complex rocks mostly consist of sandstone, conglomerate, chert, and mélangé. Invertebrate fossils (mollusks and echinoderms) are known from the sedimentary rocks of the Franciscan Complex, but vertebrate fossils are rare (Camp 1942; PBDB 2022; UCMP 2022). Due to the rarity of scientifically significant fossils in the Franciscan Complex, Cretaceous marine sedimentary rocks and the Franciscan Complex have low paleontological sensitivity.

### **c. Geologic Units in the City and Annexation Areas**

The City and Annexation Areas contain four geologic units per Jennings and Strand (1960) (Figure 4.15-1). Two of these geologic units, Quaternary terrace deposits and Plio-Pleistocene sedimentary rocks have high paleontological sensitivity (see Table 4.15-1).

**Table 4.15-1 Geologic Units in the City and Annexation Areas and Paleontological Sensitivity**

<b>Geologic Unit (per Jennings and Strand 1960)</b>	<b>Age</b>	<b>Paleontological Sensitivity</b>
Quaternary alluvium (Qal)	Holocene	Low
Quaternary terrace deposits (Qt)	Pleistocene	High
Plio-Pleistocene sedimentary rocks (QP)	Pliocene to Pleistocene	High
Cretaceous marine sedimentary rocks (K)	Cretaceous	Low

## **4.15.2 Regulatory Setting**

### **a. Federal Regulations**

#### **National Environmental Policy Act of 1969**

The National Environmental Policy Act (NEPA), as amended, directs federal agencies to “Preserve important historic, cultural, and natural aspects of our national heritage” (Section 101(b) (4)). The current interpretation of this language has included scientifically important paleontological resources among those resources that may require preservation.

#### **National Historic Preservation Act of 1966 (16 USC 470)**

The National Historic Preservation Act (NHPA) applies to paleontological resources that are found in culturally-related contexts; such related materials qualify as cultural resources. Consequently, recovery and treatment protocols included in the Project-specific Cultural Resources Management Plan should be followed for discoveries of paleontological resources in culturally-related contexts.

## **Paleontological Resources Preservation Act of 2009 (PRPA)**

The Paleontological Resources Preservation Act (PRPA) is part of the Omnibus Public Land Management Act of 2009 (PL 111-011 Subtitle D). This act directs the Secretary of the Interior or the Secretary of Agriculture to manage and protect paleontological resources on federal land and to develop plans for inventorying, monitoring, and deriving the scientific and educational use of such resources. It prohibits the removal of paleontological resources from federal land without a permit issued under this act, establishes penalties for violation of this act, and creates a program to increase public awareness about these resources. A paleontological resource use permit is required to collect paleontological resources of scientific interest. The act requires that paleontological resources collected under a permit remain United States property, preserved for the public in an approved repository, and available for scientific research and public education. The act also requires that the nature and location of paleontological resources on public lands remain confidential as a means of protecting the resources from theft and vandalism. Section 6301 of the PRPA and Departmental Proposed Rule at 43 CFR Part 49 define a paleontological resource as:

Any fossilized remains, traces, or imprints of organisms, preserved in or on the earth's crust, that are of paleontological interest and that provide information about the history of life on earth, except that the term does not include— (A) any materials associated with an archaeological resource... (B) any cultural item... (3) Resources determined in writing by the authorized officer to lack paleontological interest or not provide information about the history of life on earth, based on scientific and other management considerations.

Consistent with the definition of a paleontological resource under the PRPA, those paleontological resources that lack scientific interest (e.g., resources that are ubiquitous or do not provide information about the history of life on earth) are considered scientifically non-significant fossils.

### **b. State Regulations**

#### **California Public Resources Code**

Section 5097.5 of the Public Resources Code states the following:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

The term “public lands” means those owned by, or under the jurisdiction of, the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with Public Resources Code Section 5097.5 for their own activities, including construction and maintenance, and for permit actions (e.g., encroachment permits) undertaken by others.



### 4.15.3 Impact Analysis

#### a. Significance Thresholds and Methodology

According to Appendix G of the *CEQA Guidelines*, impacts related to paleontological resources from implementation of the project would be significant if it would:

1. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The paleontological sensitivity of the geologic units that underlie the City and Annexation Areas were evaluated to assess Ukiah 2040's potential for significant impacts to scientifically important paleontological resources. The analysis was based on the review of existing information in the scientific literature regarding known fossils within geologic units mapped in the City and Annexation Areas. According to the SVP (2010) classification system, geologic units can be assigned a high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources. Following the literature review, a paleontological sensitivity classification was assigned to each geologic unit mapped within the City and Annexation Areas. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units.

#### b. Project Impacts and Mitigation Measures

**Threshold 1:** Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

##### **IMPACT PAL-1      DEVELOPMENT FACILITATED BY THE PROJECT HAS THE POTENTIAL TO IMPACT PALEONTOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

As shown in Table 4.15-1, the City and Annexation areas are underlain by four geologic units: Quaternary alluvium (low sensitivity); Quaternary terrace deposits (high sensitivity); Plio-Pleistocene sedimentary rocks (high sensitivity); and Cretaceous marine sedimentary rocks (low sensitivity).

Ground disturbance in previously undisturbed portions of the City and Annexation areas underlain by geologic units with high paleontological sensitivity may result in potentially significant impacts to paleontological resources. Ukiah 2040 contains the following proposed goal and policies related to reducing impacts to paleontological resources.

##### **Goals ENV-3: To preserve and protect historic and archaeological resources in Ukiah.**

**Policy ENV-3.2:** Archaeological Resource Impact Mitigation. The City shall ensure appropriate and feasible mitigation for new development that has the potential to impact sites likely to contain archaeological, paleontological, cultural, or tribal resources.

**Policy ENV-3.3:** Protect Archaeological Resources. The City shall require any construction, grading, or other site altering activities cease if cultural, archaeological, paleontological, or cultural resources are discovered until a qualified professional has completed an evaluation of the site.

Although these proposed goal and policies would reduce impacts, potentially significant impacts to paleontological resources can only be determined once a specific project has been proposed. The potential effects of a project on paleontological resources are highly dependent on both the individual project site conditions (e.g., presence and depth of disturbed sediments or artificial fill) and the characteristics of the proposed ground-disturbing activity (i.e., depth of ground disturbance and construction activity). Therefore, ground disturbing construction activities in disturbed or developed areas may impact paleontological resources if previously undisturbed, high-sensitivity sediments are encountered below the surface.

Ground disturbing activities associated with construction facilitated by Ukiah 2040 have the potential to damage or destroy paleontological resources that may be present on or below the ground surface in areas of high paleontological sensitivity. Consequently, damage to or destruction of fossils could occur due to development from Ukiah 2040. Impacts would be potentially significant. Mitigation Measure PAL-1 would require the City to implement a new policy in Ukiah 2040, requiring that future projects be assessed for its potential to significantly impact paleontological resources.

### **Mitigation Measures**

#### *PAL-1      Retention of Qualified Professional Paleontologist*

The City shall implement the following policy into Ukiah 2040:

Prior to initial ground disturbance in areas underlain by high sensitivity geologic units (i.e., Quaternary terrace deposits and Plio-Pleistocene sedimentary rocks), the City shall require the project applicant retain a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP) (2010), to determine the project's potential to significantly impact paleontological resources according to SVP (2010) standards. If necessary, the Qualified Professional Paleontologist shall recommend mitigation measures to reduce potential impacts to paleontological resources to a less than significant level.

### **Significance After Mitigation**

Implementation of Mitigation Measure PAL-1 would reduce adverse effects to paleontological resources and impacts would be less than significant with mitigation.

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## 4.16 Effects Found Not to be Significant

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During evaluation of the project, certain impact areas included in the California Environmental Quality Act (CEQA) Appendix G checklist were found to have a less than significant impact or no impact. As allowed under CEQA Guidelines Section 15128, this section discusses why impacts to these environmental topics were determined to have a less than significant impact or no impact and therefore are not discussed in detail in the Draft Environmental Impact Report (EIR) as individual sections.

### 4.16.1 Energy

Would the project:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Construction and demolition activities associated with the project would require energy resources in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Energy use during construction would be temporary in nature and construction equipment would be like equipment used for construction projects in the region. Development facilitated by Ukiah 2040 would utilize construction contractors that would be required to comply with applicable California Air Resource Board (CARB) regulations such as accelerated retrofitting, repowering, or replacement of heavy-duty diesel on-road and off-road equipment. Construction contractors are required to comply with the provisions of CCR Title 13, sections 2449 and 2485, and CARB regulations prohibiting diesel-fueled commercial and off-road vehicles from idling for more than five minutes, minimizing unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would minimize inefficient fuel consumption. These construction equipment standards (i.e., Tier 4 efficiency requirements) are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068. Electrical power would be consumed during construction activities, and the demand, to the extent required, would be supplied from existing electrical infrastructure in the region. Overall, construction activities would not have a substantial adverse impact on available electricity supplies or infrastructure. Operational energy demand from future development would include fuel consumed by passenger vehicles and electricity consumed by residential and non-residential buildings including, but not limited to lighting, water conveyance, and air conditioning. Ukiah 2040 includes the following proposed goals and policies that would ensure that wasteful, inefficient, or unnecessary consumption of energy resources would not occur from future development facilitated by Ukiah 2040:

**Goal ENV-7:** To improve air quality to the benefit of public health, welfare, and reduce air quality impacts with adverse effects on residents' health and wellbeing.

**Policy ENV-7.7:** City Vehicle and Equipment Fleet. The City shall continue to purchase low-emission vehicles and use clean alternative fuels as part of their fleet. When possible, the City will replace gas and hybrid vehicles with electric vehicles.

**Policy ENV-7.8:** Residential EV Charging Stations. The City shall encourage new development to install EV charging stations in homes to increase the potential for the public to use zero-emission vehicles, lessening the impacts to air quality through pollution.

**Policy ENV-7.9:** Public EV Charging Stations. The City shall install public charging stations in its commercial areas to provide additional charging options for city visitors.

**Goal ENV-8:** To achieve carbon neutrality by or before the year 2045.

**Policy ENV-8.1:** Carbon Neutrality Resolution. The City shall adopt a Carbon Neutrality Resolution that provides a foundation for all subsequent climate actions.

**Policy ENV-8.2:** Micro-grid and Small Battery Storage. The City shall encourage the development of small-scale battery storage and micro grid capacity for storing renewable power for nighttime energy use.

**Policy ENV-8.3:** Municipal Building Electrification Plan. The City shall adopt an electrification plan for all municipal buildings to convert them to all electric using energy from carbon-free and renewable sources by 2035.

**Policy ENV-8.4:** Municipal Preference of Emissions-Reduced Equipment. The City shall contract only with providers who use electric-powered equipment where available and feasible for City construction projects or contract services.

**Policy ENV-8.5:** Energy Conservation and Renewable Energy. The City shall promote energy conservation in municipal facilities by seeking opportunities to install energy efficient fixtures and appliances, solar panels, solar battery storage, and other retrofits to new and existing structures.

**Goal MOB-2:** To reduce vehicle miles traveled (VMT) to and from residences, jobs, and commercial uses in Ukiah.

**Policy MOB-2.1:** Vehicle Miles Traveled (VMT) Reduction. The City shall support development and transportation improvements that help reduce VMT below regional averages on a “residential per capita” and “per employee” basis.

**Policy MOB-2.2:** Transportation Demand Management. The City shall support programs to reduce vehicle trips, including measures such as reduced parking requirements that aim to increase transit use, car-pooling, bicycling and walking.

Implementation of proposed Goals ENV-7, ENV-8, MOB-2, and their associated policies would lower reliance on petroleum for transportation, reduce vehicle transportation overall, and reduce energy impacts related to the operation of residences, businesses, and municipal buildings. Goal ENV-8, which would aim to achieve carbon neutrality by 2045 would reduce consumption of non-renewable energy sources and would ensure that development facilitated by Ukiah 2040 would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, impacts would be less than significant.

While the City of Ukiah has not adopted a local plan for renewable energy or energy efficiency, there are several state plans that include energy conservation and energy efficiency strategies intended to enable the State and the City to achieve greenhouse gas (GHG) reduction and energy conservation goals. A full discussion of the project’s consistency with GHG reduction plans is included in Section 4.6, *Greenhouse Gas Emissions*. As shown in Table 4.16-1, the project would be consistent with State renewable energy regulations and energy efficiency plans.

**Table 4.16-1 Consistency with State Renewable Energy and Energy Efficiency Plans**

Renewable Energy or Energy Efficiency Plan	Project Consistency
<p><b>California Energy Plan.</b> The plan identifies several strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs, as well as encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.</p>	<p><b>Consistent.</b> As described above, Ukiah 2040 includes proposed Goal ENV-7, ENV-8, MOB-2, and their associated policies. Policy ENV-7.7 states that the City shall continue to purchase low-emission vehicles and use clean alternative fuels in their municipal fleet, and Policies ENV-8.3 and ENV-8.4 state that the City shall adopt an electrification plan for all municipal buildings and contract with providers who use electric-powered equipment where available. Furthermore, Ukiah 2040 includes proposed Policies MOB-2.1 and MOB-2.2, which state that the City shall support development and programs that help reduce vehicle miles traveled (VMT) and vehicle trips. Therefore, the project would be consistent with the California Energy Plan.</p>
<p><b>Assembly Bill 2076: Reducing Dependence on Petroleum.</b> Pursuant to AB 2076, the CEC and CARB prepared and adopted a joint-agency report, <i>Reducing California's Petroleum Dependence</i>, in 2003. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT. One of the performance-based goals of AB 2076 is to reduce petroleum demand to 15 percent below 2003 demand.</p>	<p><b>Consistent.</b> Ukiah 2040 includes proposed Policy ENV-7.7, which states that the City shall continue to purchase low-emission vehicles and use clean alternative fuels in their municipal fleet. Ukiah 2040 also includes proposed Policies ENV-8.3 and ENV-8.4, which state that the City shall adopt an electrification plan for all municipal buildings and contract with providers who use electric-powered equipment where available. Furthermore, Ukiah 2040 includes proposed Policies MOB-2.1 and MOB-2.2, which state that the City shall support development and programs that help reduce VMT and vehicle trips. Therefore, the project would be consistent with Assembly Bill 2076.</p>
<p><b>2018 Integrated Energy Policy Report.</b> Volume I highlights the implementation of California's innovative policies and the role they have played in establishing a clean energy economy. Volume II provides more detail on several key energy policies, including decarbonizing buildings, increasing energy efficiency savings, and integrating more renewable energy into the electricity system.</p>	<p><b>Consistent.</b> The project would include several components that promote the use of renewable energy and energy efficiency in new buildings. Proposed Goal ENV-8 of Ukiah 2040 establishes a goal of carbon neutrality by 2045, and proposed Policy ENV-8.1 states that the City shall adopt a resolution to support subsequent climate actions. Ukiah 2040 also includes proposed Policies ENV-8.3 and ENV-8.4, which state that the City shall adopt an electrification plan for all municipal buildings and contract with providers who use electric-powered equipment where available. Therefore, Ukiah 2040 would be consistent with the 2018 Integrated Energy Policy Report.</p>
<p><b>California Renewable Portfolio Standard.</b> California's Renewable Portfolio Standard obligates investor-owned utilities, energy service providers, and community choice aggregators to procure 33 percent total retail sales of electricity from renewable energy sources by 2020, 60 percent by 2030, and 100 percent by 2045.</p>	<p><b>Consistent.</b> Electricity in the City of Ukiah is maintained and provided by the City's Electric Department and procured through the Northern California Power Agency (NCPA). NCPA is required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. NCPA's energy generation portfolio is currently approximately 55 percent emission-free (NCPA 2022). NCPA reached California's goal of 50 percent Renewables Portfolio Standard by 2020 and is on track to meet the new 60 percent Renewables Portfolio Standard by 2030. Because NCPA would provide electricity service to the City and its Annexation Areas, development facilitated by the project would not conflict with or</p>



Renewable Energy or Energy Efficiency Plan	Project Consistency
<p><b>AB 1493: Reduction of Greenhouse Gas Emissions.</b> AB 1493 requires CARB to develop and adopt regulations that achieve maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.</p>	<p>obstruct implementation of the California Renewable Portfolio Standard.</p> <p><b>Consistent.</b> Vehicles used by future residents, employees, visitors, and patrons facilitated by the project would be subject to the regulations adopted by CARB pursuant to AB 1493. Therefore, the project would not conflict with or obstruct implementation of AB 1493.</p>
<p><b>Energy Action Plan (EAP).</b> In October 2005, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the EAP in February 2008 that supplements the earlier EAPs and examines the state’s ongoing actions in the context of global climate change. The nine major action areas in the EAP include energy efficiency, demand response, renewable energy, electricity adequacy/reliability/infrastructure, electricity market structure, natural gas supply/demand/infrastructure, transportation fuels supply/demand/infrastructure, research/development/demonstration, and climate change.</p>	<p><b>Consistent.</b> Ukiah 2040 includes several proposed policies and goals that promote the use of renewable energy and energy efficiency in new buildings. Ukiah 2040 includes proposed Policies ENV-8.3 and ENV-8.4, which state that the City shall adopt an electrification plan for all municipal buildings and contract with providers who use electric-powered equipment where available. Furthermore, proposed Goal ENV-8 establishes a goal of carbon neutrality by 2045 and proposed Policy ENV-8.1 states that the City shall adopt a resolution to support subsequent climate actions. In addition, development facilitated by the project would be required to comply with Ukiah City Code Section 3000, which mandates the implementation of Title 24 of the California Building Code. Compliance would include rooftop solar on all residential building types that are three stories or less in height. Electricity would be provided by NCPA, which sources approximately 55 percent of their power from renewable sources (NCPA 2022). With adherence to these regulations and construction of these features, the project would facilitate implementation of the nine major action areas in the Energy Action Plan. Therefore, the project would not conflict with or obstruct implementation of the Energy Action Plan.</p>
<p><b>AB 1007: State Alternative Fuels Plans.</b> The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California’s goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.</p>	<p><b>Consistent.</b> Ukiah 2040 includes proposed Goal ENV-8, which establishes a goal of carbon neutrality by 2045 and proposed Policy ENV-8.1, which states that the City shall adopt a resolution to support subsequent climate actions. The project also includes proposed Policies ENV-7.8 and ENV-7.9, which state that the City shall install public EV charging stations and encourage new development to install EV charging stations. Therefore, the vehicle charging stations would facilitate the use of alternative fuels and the project would not conflict with or obstruct implementation of AB 1007.</p>

Renewable Energy or Energy Efficiency Plan	Project Consistency
<p><b>Title 24, California Code of Regulations – Part 6 (Building Energy Efficiency Standards) and Part 11 (CALGreen).</b></p> <p>The 2019 Building Energy Efficiency Standards move toward cutting energy use in new homes by more than 50 percent and will require installation of solar photovoltaic systems for single-family homes and multi-family buildings of three stories and less.</p> <p>The CALGreen Standards establish green building criteria for residential and nonresidential projects. Updates to the 2016 Standards include the following: increasing the number of parking spaces that must be prewired for electric vehicle chargers in residential development; requiring all residential development to adhere to the Model Water Efficient Landscape Ordinance; and requiring more appropriate sizing of heating, ventilation, and air conditioning (HVAC) ducts.</p>	<p><b>Consistent.</b> Development facilitated by the project would be required to comply with Ukiah City Code Section 3000, which mandates the implementation of Title 24 of the California Building Code. Therefore, the project would not conflict with or obstruct implementation of the Title 24 standards.</p>

As demonstrated above in Table 4.16-1, Ukiah 2040 would be consistent with state energy conservation and efficiency plans and strategies. Furthermore, construction and operation of future projects would be required to comply with relevant provisions of CALGreen and Title 24 of the California Energy Code. Therefore, impacts would be less than significant.

## 4.16.2 Geology and Soils

Would the project:

- 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? Refer to Division of Mines and Geology Special Publication 42.
  - Strong seismic ground shaking?
  - Seismic-related ground failure, including liquefaction?
  - 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?
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The City of Ukiah is bordered by the Maacama Fault, which runs generally north to south alongside the Russian River in the foothills east of Watson Road, Vichy Springs Road, and Redemeyer Road (DOC 2018). The Maacama Fault does not lie within city limits; however, the Maacama Fault is located within a portion of the current and proposed SOI. Ukiah 2040 would not facilitate development on the Maacama Fault. Due to the proximity of the Maacama Fault to the City, future development could be subject to strong seismic ground shaking. The Planning Area is not highly susceptible to liquefaction (when soils collapse as seismic waves pass through them); however, there may be moderate risk of liquefaction along creeks and rivers (City of Ukiah 2020). Accordingly, future development near creeks and rivers could be subject to seismic related ground failure. Additionally, landslides have occurred in the Ukiah Valley over the years, and geologic studies have revealed evidence of large, ancient landslides in the valley (City of Ukiah 2020). Furthermore, the DOC has identified landslide deposits in the western hills of Ukiah (DOC 2019).

Development within the City's Hillside District, which typically contains steep slopes, requires discretionary and environmental review for new construction and grading activities in order to analyze impacts related to geology and soils. Specifically, any parcel of land or subdivision having an average ground gradient across any portion of the property in excess of fifteen percent requires a Use Permit issuable by the Planning Commission with a right of appeal to the City Council. To ensure development is being properly designed, development in this district also requires submittal of Geotechnical Reports, Grading Plans, Hydrology Reports, etc. These reports and plans will include a set of site/project specific recommended Best Management Practices and mitigation measures (if needed) to avoid impacts to geology and soils.

Additionally, all future development would be subject to the California Building Code (CBC) engineering design and construction measures. Development designed in accordance with the CBC would be able to: 1) resist minor earthquakes without damage; 2) resist moderate earthquakes without structural damage, but with some non-structural damage; and 3) resist major earthquakes without collapse, but with some structural, as well as non-structural, damage. Compliance with the CBC would minimize potential structural damage and the exposure of people to the risk of injury or death from structural failure. Foundations and other structures for features would be designed to resist and absorb damaging forces from strong ground shaking and liquefaction, in accordance with CBC requirements. Specifically, Section 1613 of the CBC requires every structure and portion thereof (including nonstructural components that are permanently attached to structures and their supports and attachments) to be designed and constructed to resist the effects of earthquake motions. Additionally, Ukiah 2040 would facilitate development on infill sites, which would in many cases replace older buildings with newer structures built to current seismic standards that could better withstand the adverse effects of strong ground shaking. Furthermore, Ukiah 2040 includes the following proposed goals and policies related to minimizing the risks associated with seismic and geologic hazards to protect public health and safety, property, and the environment:

**Goal SAF-1:** Minimize risk to people and property resulting from geologic and seismic hazards through effective development regulation.

**Policy SAF-1.1:** Building Code Requirements. The City shall mitigate the potential impact for harm associated with geologic hazards by adopting and implementing the requirements outlined within the California Building Code and State seismic design guidelines.

**Policy SAF-1.2:** Geotechnical Report. Where projects are proposed within designated risk zones, require professionally prepared geotechnical evaluations prior to site development. If a discretionary permit is required, the geotechnical report shall be submitted with the permit application.

**Policy SAF-1.3:** Resilient Infrastructure – Gathering Places. Encourage privately owned critical facilities (e.g., churches, hotels, other gathering facilities) to evaluate the ability of the buildings to withstand earthquakes and to address any deficiencies identified.

**Policy SAF-1.4:** Resilient Infrastructure – Unreinforced Masonry. Continue an outreach and education program for owners and tenants in downtown unreinforced masonry buildings to understand earthquake risks and precautions and, for owners, to understand retrofitting options and available funding mechanisms.

Adherence to the proposed policies above would reduce impacts related to seismic and geologic hazards. Policies SAF-1.1 and SAF-1.2 would ensure that future projects would be reviewed for seismic and geologic hazards prior to development. Geotechnical reports and subsequent recommendations would also identify and minimize site-specific seismic and geologic hazards to the extent feasible. Implementation of Ukiah 2040 proposed goals and policies, in addition to compliance with the CBC and relevant Ukiah City Code sections, would reduce impacts related to rupture of a known earthquake fault, seismic ground shaking, seismic ground failure or liquefaction, or landslides to less than significant levels.

Future development would involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. Construction activities that disturb one or more acres of land surface are subject to the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board (SWRCB). Compliance with the permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit conditions require development of a storm water pollution prevention plan (SWPPP), which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-storm water management controls. Inspection of construction sites before and after storms is also required to identify storm water discharge from the construction activity and to identify and implement erosion controls where necessary. Ukiah City Code (Division 9, Chapter 7) details the City's Erosion and Sediment Control Ordinance which regulates grading on public and private property to control erosion and sedimentation. Section 9703 details required design standards, including soil stabilization measures and materials management. Section 9704 states that all construction projects must comply with erosion and sediment control measures within an issued grading permit. Compliance with the requirements of the Ukiah City Code and NPDES requirements would reduce the potential for construction and soil disturbance to cause erosion or the loss of topsoil, by ensuring proper management of loose and disturbed soil. Impacts related to erosion and loss of topsoil would be less than significant.

Future development may result in the construction of structures on expansive or unstable soils.<sup>1</sup> Structures located on expansive or unstable soils could experience structural damage due to fluctuations or settlement of the soil. Implementation of proposed Policy SAF-1.1, in addition to Ukiah City Code Section 3000, would ensure that development facilitated by the project would comply with the CBC and other applicable building regulations. Implementation of proposed Policy SAF-1.2 and preparation of geotechnical reports would identify site-specific expansive or unstable soils and provide recommendations to minimize associated risks. Furthermore, Ukiah City Code

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<sup>1</sup> Expansive soils are soils that experience a shrink-swell effect depending on its moisture content

Section 8141 requires that if a preliminary soil report indicates the presence of critically expansive soils that would lead the structural defects, the City Building Inspector shall require a soil investigation that shall recommend corrective action to prevent structural damage. Implementation of Ukiah 2040 proposed policies and compliance with the CBC and Ukiah City Code would ensure that impacts related to expansive or unstable soils would be less than significant.

Development facilitated by the project would occur within developed areas containing existing sanitary sewer systems, and it is not anticipated that development would require the installation of septic tanks or alternative sewer systems. Impacts would be less than significant.

CEQA Guidelines Appendix G includes the following question under Geology and Soils: directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? This question is discussed in Section 4.5, *Cultural Resources*.

### 4.16.3 Hazards and Hazardous Materials

Would the project:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- 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 it create a significant hazard to the public or the environment?
- 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?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction of future development would require the temporary transport, storage, use, or disposal of potentially hazardous materials including but not limited to fuels, lubricating fluids, cleaners, and/or solvents. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of hazardous materials is subject to various federal, state, and local regulations designed to reduce risks associated with hazardous materials, including potential risks associated with upset or accident conditions. Hazardous materials would be required to be transported under U.S. Department of Transportation (DOT) regulations (U.S. DOT Hazardous Materials Transport Act, 49 Code of Federal Regulations), which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In addition, the use, storage, and disposal of hazardous materials are regulated through the Resources Conservation and Recovery Act (RCRA). The California Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program, as well as California's hazardous waste laws. DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California. DTSC does this primarily under the authority of RCRA and in accordance with the

California Hazardous Waste Control Law (California H&SC Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (Title 22, California Code of Regulations, Divisions 4 and 4.5). DTSC also oversees permitting, inspection, compliance, and corrective action programs to ensure that hazardous waste managers follow federal and state requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Compliance with existing regulations would reduce the risk of potential release of hazardous materials from spills and transport during construction. Implementation of Ukiah 2040 would encourage additional residential and non-residential (i.e., commercial and mixed-use) uses. Residences do not typically store or use large quantities of hazardous materials. Non-residential uses may involve the transport, use, storage, or disposal of hazardous materials and would be subject to applicable hazardous materials regulations and manufacturer guidelines. Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, disposal, or release of hazardous materials, and impacts would be less than significant.

Residential and office uses typically do not emit hazardous materials or substances. Since the project does not include specific development projects, the quantity of hazardous materials proposed for use by future commercial and industrial developments within the City is currently unknown. However, the commercial or industrial development facilitated by the project could include uses that generate and emit hazardous materials or substances, such as gas stations, dry cleaners, and auto-body shops. Accidental release or combustion of hazardous materials at new commercial and industrial developments within 0.25 mile of a school could endanger residents or students in the surrounding community. As discussed above, construction could involve the handling, use, transport, and storage of hazardous materials, which would be governed by federal, state, and local regulations described above, and would follow applicable project-specific requirements. Furthermore, development facilitated by the project would be reviewed by the City to ensure land use compatibility, which would reduce the risk of hazardous materials emissions near schools. Impacts would be less than significant.

Existing sites in the Planning Area that use or have historically used hazardous materials, or that may contain contaminants in soils or groundwater include uses such as gas stations and industrial uses. The Planning Area contains nine historically hazardous materials sites included on a list of sites prepared by Government Code Section 65962.5, only one of which is active (California Department of Toxic Substances Control 2022). Furthermore, there are no Superfund or other State Responsibility sites in the Planning Area. Nonetheless, development facilitated by Ukiah 2040 could expose construction workers and future occupants to hazardous materials. These properties can be released for reuse, with restrictions to prevent inappropriate land uses. Development of identified hazard sites would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board (RWQCB), Mendocino County Environmental Health, or DTSC before construction activities could begin as currently required by federal, State, and local regulations. The agency responsible for oversight would determine the types of remediation and cleanup required and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants. Compliance with federal, State, and local regulations would apply to development. Because the project would not increase the likelihood for development of identified hazard sites, impacts would be less than significant.



Ukiah 2040 would introduce new residents or employees that would require emergency response evacuation. The Safety Element of Ukiah 2040 includes proposed goals and policies to ensure safe and efficient evacuation and emergency response. Applicable goals and policies are as follows:

**Goal SAF-6:** To ensure that the City is adequately prepared for emergencies of any variety through effective planning measures.

**Policy SAF-6.1:** Evacuation Routes. The City shall coordinate with the Ukiah Valley Fire Authority to review, update, and periodically exercise emergency access, protocols, and evacuation routes to assess their effectiveness.

**Policy SAF-6.2:** Hazard Mitigation Plan. The City shall continue to participate in and implement the Mendocino County Hazard Mitigation Plan to ensure maximum preparedness for hazard events.

**Policy SAF-6.3:** Locally Focused Plans. The City shall maintain and implement locally focused plans, including an Emergency Operations Plan, to maintain consistency with State and Federal requirements.

Policies listed above direct the City to ensure effective and coordinated response to disasters, which would include events warranting evacuation. These proposed goals and related policies in the Safety Element of Ukiah 2040 would ensure adequate emergency response and evacuation. Furthermore, future development would not block or reconfigure major roadways that are critical to emergency response or evacuation routes. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

CEQA Guidelines Appendix G includes the following question under Hazards and Hazardous Materials: would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? This question is discussed in Section 4.14, *Wildfire*.

#### 4.16.4 Hydrology and Water Quality

Would the project:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater 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 offsite;
  - 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 flood flows?

- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Construction activities associated with future development could result in soil erosion during earth-moving activities, including excavation, grading, soil compaction and moving, and soil stockpiling. Future development project would be required to comply with State and local water quality regulations designed to control erosion and protect water quality during construction. This includes compliance with the requirements of the SWRCB's NPDES Construction General Permit, which requires preparation and implementation of a SWPPP for projects that disturb one acre or more of land. The SWPPP must include erosion and sediment control BMPs that would meet or exceed measures required by the NPDES Construction General Permit. BMPs may include measures such as the installation of silt fences to trap sediments, slope stabilization, and regular sweeping of construction sites to control dust. This would also ensure that future projects comply with stormwater control measures outlined in Ukiah City Code (Division 9, Chapter 7), which requires BMPs that reduce the discharge of sediment and other particulate matter into the City's groundwater system. Post-construction stormwater performance standards established by the North Coast RWQCB are also required to specifically address water quality and channel protection events. Implementation of the required SWPPP during construction activities would reduce the potential for eroded soil and any contaminants attached to that soil to contaminate a waterbody following a storm event. Therefore, construction of specific developments facilitated by the project would not violate any water quality standards or otherwise substantially degrade water quality, and water quality impacts from construction would be less than significant.

In addition, the City of Ukiah is a permittee for the Municipal Separate Storm Sewer System (MS4) issued by the North Coast RWQCB (Order No. R1-2015-0030), which also serves as a NPDES permit under the Federal Clean Water Act (NPDES No. CA0025054). Future projects would be required to adhere to all requirements under this permit, which include but are not limited to implementation of stormwater treatment measures that minimize the discharge of pollutants in stormwater runoff, non-stormwater discharge, and increases in runoff flows during the life of the project. Low impact design principles would also be required under this permit, which limit the amount of impermeable surface and include integrated management practices that help infiltrate, store, or evaporate stormwater during and immediately after storm events. Furthermore, the following Ukiah 2040 proposed goals and policies would apply to stormwater management:

**Goal PFS-5:** To maintain an adequate stormwater management system to accommodate runoff and improve environmental quality.

**Policy PFS-5.1:** Low Impact Development. The City shall require new developments to install green infrastructure consistent with the sustainable objectives of the State and the North Coast Regional Water Quality Control Board, including but not limited to pervious pavement, infiltration basins, raingardens, green roofs, rainwater harvesting systems, and other types of low impact development (LID).

**Policy PFS-5.2:** Pollutants Discharge Reduction. The City shall provide non-point source pollution control programs to reduce and control the discharge of pollutants into the storm drain system and Russian River.

Compliance with federal, State, and local regulations; permit requirements and Ukiah 2040 proposed goals and policies would minimize impacts related to water quality and ensure that

operation of future development would not cause or contribute to the degradation of water quality in receiving waters. Therefore, operation of specific developments facilitated by the project would not violate any water quality standards or otherwise substantially degrade water quality, and water quality impacts would be less than significant.

Although Ukiah 2040 would facilitate infill development and reuse of underutilized sites, Ukiah 2040 has the potential to increase the total area of impervious surface, which could interfere with groundwater recharge. However, as individual future projects are proposed, those disturbing more than one acre would be required to comply with the NPDES program by obtaining project-specific coverage under the State's Construction General Permit. This would require development and implementation of a project-specific SWPPP, which would include BMPs for appropriate dewatering practices, as applicable. Operational uses of water, including those that would be accessed from groundwater sources, is addressed in Section 4.13, *Utilities and Service Systems*. In addition, Ukiah 2040 contains several proposed goals and policies that would encourage groundwater infiltration and water conservation, as follows:

**Goal PFS-1:** To maintain a safe and adequate water system to meet the needs of existing and future development.

**Policy PFS-1.1:** Water Service Annexation Impacts. The City shall ensure newly annexed areas within the city do not negatively affect water services to existing customers.

**Policy PFS-1.2:** Russian River Water Rights. The City shall protect and confirm all Russian River tributary water rights to which the Ukiah Valley and City may be entitled.

**Policy PFS-1.3:** Consolidation of Water Districts. The City shall support the consolidation of water districts as part of future annexations to establish efficient services and ensure adequate water supply and delivery.

**Policy PFS-1.4:** Water Storage. The City shall encourage the protection and expansion of existing sources and methods of water storage for future development.

**Policy PFS-1.5:** Recycled Water Project. The City shall explore the potential expansion of the Recycled Water Project to provide non-potable water to areas of large-scale urban irrigation, such as Todd Grove Park and the golf course.

**Policy PFS-1.6:** Reduce Reliance on the Russian River. The City shall continue to support the reduction on the reliance of surface water from the Russian River as a water source to serve the community.

**Policy PFS-1.7:** Groundwater Recharge. The City shall enhance groundwater supply by looking to expand its capacity to recharge by developing storm ponding and retention basins where feasible. In some areas these ponds or basins can be incorporated into a recreational area, used as wildlife habitat area, or may be required by new development to offset impacts associated with new nonpermeable surfaces.

The implementation of these goals and policies would require implementation of low impact design and BMPs, which would increase groundwater infiltration through permeable surfaces and would contribute beneficially to groundwater recharge. With adherence to Ukiah 2040 proposed goals and policies and conformance with the requirements of the NPDES that address dewatering and groundwater discharge, future development would not substantially decrease groundwater supply or interfere with groundwater recharge and Ukiah 2040 would not impede sustainable groundwater management of the basin. Impacts would be less than significant.

Implementation of Ukiah 2040 could alter the existing drainage patterns on individual project sites due to grading and changes in topography. Project designs would be reviewed by the City to ensure that grading plans and development configurations would not impinge upon protected creeks, in accordance with Ukiah 2040 proposed Policy ENV-6.5 (shown below). Furthermore, future development would be subject to provisions that reduce flooding hazards, require effective stormwater management, and address streambed alterations as part of the permitting process for that specific project. Implementation of proposed Goal PFS-5 and Policy PFS-5.1 (shown above) and proposed Goal ENV-6 and Policy ENV-6.6 (shown below), during design of future project, would ensure proper stormwater system management, maintain appropriate development setbacks from creeks, and minimize the potential for erosion and siltation:

**Goal ENV-6:** To preserve and restore creeks, streams, riparian areas, and wetlands.

**Policy ENV-6.5:** Creek Protection. The City shall require new development located adjacent to stream corridors to include appropriate measures for creek bank stabilization, erosion and sedimentation prevention, and natural creek channel and riparian vegetation preservation.

**Policy ENV-6.6:** Erosion Control Plan. The City shall require new development that requires significant grading near creeks, streams, wetlands, and riparian areas to prepare erosion control plans that address grading practices that prevent soil erosion, loss of topsoil, and drainageway scour, consistent with biological and aesthetic values.

The Ukiah 2040 proposed goals and policies listed throughout this section would reduce potential impacts to drainage patterns by ensuring that protection from flood hazards and preservation of creeks and streams are a priority when approving future development projects. Furthermore, Ukiah City Code provides regulations that ensure specific projects conform to the requirements of the NPDES and SWPPP BMPs. Therefore, Ukiah 2040 would not substantially alter the existing drainage patterns or contribute runoff water in a manner which would result in substantial erosion, siltation, or flooding, nor would it exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

According to flood hazard maps prepared by the Federal Emergency Management Agency (FEMA), several areas throughout the Planning Area would be located within a regulatory floodway, a 1 percent Annual Chance Flood Hazard Zone, or a 0.2 percent Annual Chance Flood Hazard Zone (FEMA 2011). Areas within flood hazard zones are located along the Russian River and its tributaries throughout the city. Development facilitated by Ukiah 2040, located within a flood hazard zone, would be subject to requirements of the CBC, which establishes design requirements for development located in floodplains. Furthermore, future development would also be required to comply with all regulations and requirements set forth by FEMA that prohibit or restrict development in flood hazard zones as part of the flood zone management plan implemented by the City. The following Ukiah 2040 proposed goals and policies would apply to the reduction of the potential for projects to be inundated by flood hazards:

**Goal SAF-3:** Minimize adverse impacts related to flooding through flood mitigation components and ongoing flood management practices.

**Policy SAF-3.1:** Flood Control Regulation. The City shall coordinate with FEMA to ensure that the City's regulations related to flood control are in compliance with Federal, State, and local guidelines.

**Policy SAF-3.2:** Flood Plain Management Ordinance. The City shall maintain an updated Flood Plain Management Ordinance specifying proper construction methods in identified flood hazard areas.

**Policy SAF-3.3:** National Flood Insurance Program. The City shall maintain compliance with the provisions of FEMA's National Flood Insurance Program (NFIP).

Implementation of these policies would ensure that future development would comply with applicable City regulations and FEMA provisions, which would reduce the risk of release of hazardous materials due to inundation. Finally, the City of Ukiah is not located near an ocean that could experience a tsunami and is not located near a large body of water that could experience a seiche. Therefore, the risk of pollutant release due to project inundation is less than significant.

The City of Ukiah is underlain by the Ukiah Valley Groundwater Basin, which is managed by the Ukiah Valley Basin Groundwater Sustainability Agency (UVBGSA). The UVBGSA was created to serve as the state-mandated Groundwater Sustainability Agency as required by the Sustainable Groundwater Management Act of 2014. In December 2021, the UVBGSA adopted its Groundwater Sustainability Plan which establishes goals for maintaining groundwater elevations above their historically measured range, maintaining groundwater quality, and preventing adverse effects such as land subsidence or streamflow depletions due to groundwater pumping (UVBGSA 2021). As discussed above, Ukiah 2040 would include proposed Goal PFS-1 and Policies PFS-1.1 through PFS-1.7, which would increase groundwater infiltration through permeable surfaces and would contribute beneficially to groundwater recharge. These proposed goals and policies would be consistent with the goals of the UVBGSA Groundwater Sustainability Plan. Implementation of Ukiah 2040 goals and policies would assist the City in ensuring that development facilitated by Ukiah 2040 would be consistent with Ukiah Valley Basin Groundwater Sustainability Plan. Impacts would be less than significant.

## 4.16.5 Mineral Resources

Would the project:

- 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?
- 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?

There are no mineral resources, existing mines, major mineral deposits, or critical minerals within the Planning Area (USGS 2020). The City's existing 1995 General Plan identifies that the Russian River, which crosses the Planning Area north to south, can yield gravel and aggregate resources when its drainages become accessible due to historic course changes following major floods (City of Ukiah 1995). However, there are no active mineral extraction operations in the Planning Area, and according to the DOC, Mendocino County is not known to contain significant mineral resources (DOC 2020). Therefore, no impacts to mineral resources would occur.

## 5 Alternatives

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As required by *CEQA Guidelines* Section 15126.6, this chapter examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives and avoid or substantially lessen significant adverse impacts. As discussed in Section 2, *Project Description*, the guiding principles of Ukiah 2040, which are considered the basic project objectives, are as follows:

- Guide land uses and development that meet the needs of the community, are environmentally conscious, and maintain Ukiah as a diverse, family-oriented, and friendly community, where people from all racial, ethnic, and cultural backgrounds thrive socially, economically, academically, and physically.
- Ensure development in all neighborhoods is compatible with the unique characteristics and land use patterns and fosters a sense of place.
- Promote resilient and sustainable facilities and infrastructure to ensure delivery of high-quality services.
- Promote a diverse, local, business-friendly economy that fosters new job growth and is adaptable to changes in consumer habits and market trends.
- Maintain and advance a well interconnected circulation network that accommodates and encourages alternative modes of transportation that reduce congestion and encourage walkable and bikeable neighborhoods.
- Preserve existing open space resources while enhancing accessibility to parks and recreational amenities; and manage, conserve, and preserve the existing natural environment to ensure sustainable longevity for present and future generations.
- Provide for a safe community through resilient infrastructure, community-wide education and preparation, and hazard planning that is responsive to potential climate-related, natural, and human-caused disasters.
- Preserve Ukiah Regional Airport as a vital economic driver and transportation system and maintain consistency with the criteria and policies of the Ukiah Municipal Airport Master Plan.
- Foster an inclusive community through conditions that allow for and stimulate a diversity of housing options for community members of all ages, incomes, and ethnicities.

This analysis presents two alternatives, including the CEQA-required “no project” alternative, that involve changes to the project that may reduce the project-related environmental impacts identified in this EIR. These Alternatives have been developed to provide a reasonable range of options that would help decision-makers and the public understand the general implications of revising or eliminating certain components of the proposed project. The following alternatives are evaluated in this EIR:

1. Alternative 1: No Project
2. Alternative 2: Decreased Residential Density

Table 5-1 provides a summary comparison of the proposed project and each of the alternatives considered. Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 5.1 and 5.2.



**Table 5-1 Comparison of Project Alternatives' Buildout Characteristics**

	Proposed Project	Alternative 1: No Project	Alternative 2: Decreased Residential Density
Total Allowable Dwelling Units Under <sup>1</sup> Alternative	2,350	1,692	1,868
Change in Total Maximum Dwelling Units Compared to Proposed Project	N/A	-658 du	-482 du
Total Additional Residents Under Alternative <sup>1</sup>	5,640 persons	4,061 persons	4,483 persons
Change in Population Potential Compared to Proposed Project (Number of Residents)	N/A	- 1,579 persons	-1,157 persons
Total Additional Non-Residential Square Footage Under Alternative <sup>1</sup>	4,514,820 sf	3,831,300 sf	3,831,300 sf <sup>2</sup>
Change in Total Additional Non-Residential Square Footage Compared to Proposed Project	N/A	-683,520 sf	-683,520 sf

du = dwelling units, sf = square feet

<sup>1</sup> The estimates for additional dwelling units, residences, and non-residential square footage are a conservative estimate based on the maximum buildout scenario. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. These numbers are not meant to be a predictor of future growth.

<sup>2</sup> Non-residential square footage in Alternative 2 was assumed to be the same as the existing General Plan and only residential densities were changed.

## 5.1 Alternative 1: No Project Alternative

The *CEQA Guidelines* (Section 15126.6[e][2]) require that the alternatives discussion include an analysis of a No Project Alternative. Pursuant to CEQA, the No Project Alternative refers to the analysis of existing conditions and what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. The No Project Alternative typically will proceed along one of two lines: (1) when a project is a revision of an existing regulatory plan or policy, the No Project Alternative will be continuation of the existing plan or policy; or (2) if a project is a development project on identifiable property, the No Project Alternative is the circumstance under which the project does not proceed. In this case, the No Project Alternative represents the continuation of existing zoning and General Plan designations within the City's Sphere of Influence and full buildout under those existing designations is assumed to occur under this alternative. Typical development assumptions are included in the analysis of this alternative below, including compliance with applicable regulations or typical City-required measures.

### 5.1.1 Description

The No Project Alternative assumes there is no change in zoning or General Plan land use designations and analyzes the existing General Plan land use designations and densities for vacant land within the City. The No Project Alternative includes identified sites for annexation, as well as housing sites identified as part of the 2019-2027 Housing Element. As the No Project Alternative focuses on existing designations, Annexation Areas would have existing land use designations, in contrast to the proposed project, which apply City land use designations to these areas. Buildout under the No Project Alternative, assuming a maximum buildout scenario, would allow for 1,692 housing units and approximately 3,831,300 square feet of additional non-residential land uses. However, the No Project Alternative would not accomplish project objectives to the extent that the proposed project would, as the No Project Alternative would provide reduced housing options and

exclude multiple policies from Ukiah 2040 pertaining to community development, preservation of natural resources, sustainability, and improvement of Ukiah's circulation network.

## 5.1.2 Impact Analysis

### a. Aesthetics

Development under the No Project Alternative would continue the land use pattern that currently exists in Ukiah. Impacts to scenic vistas and light and glare under this alternative would be reduced when compared to the proposed project, as this alternative would involve less development. Nonetheless, development under the No Project Alternative could affect aesthetics and would be required to comply with the same Ukiah City Code regulations as the proposed project. Both the No Project Alternative and the proposed project would have less than significant impacts on aesthetics; however, the severity of the impact for the No Project Alternative would be slightly less than for the proposed project. This is because the No Project Alternative would have less development than the proposed project.

### b. Agriculture and Forestry Resources

Development under the No Project Alternative would continue the agricultural land use pattern currently in Ukiah. Impacts to Farmland, land under Williamson Act contract, or regarding the conversion of agricultural land to non-agricultural use would be the same as the proposed project because the proposed project does not include the conversion of such lands. However, the No Project Alternative would not include Ukiah 2040 policies designed to encourage the continued operation of agricultural lands in Ukiah. There are no zoned Timber Production Zones or forest lands within City limits or proposed annexation areas. Thus, the No Project Alternative would have no impact to forest land and would not result in the conversion of forest land to non-forest use, like the proposed project.

### c. Air Quality

Like the proposed project, buildout under the No Project Alternative would not preclude planned transit or bike pathways and would not disrupt regional planning efforts to reduce vehicle miles traveled (VMT) and meet federal and State air quality standards. The No Project Alternative would be consistent with applicable 2017 Clean Air Plan control measures, although not to the extent as the proposed project, as the No Project Alternative would not include Ukiah 2040 policies designed to reduce criteria pollutant emissions. Impacts regarding conflict with applicable air quality plans would be less than significant, albeit greater than the proposed project.

Buildout under the existing General Plan land use and zoning designations would accommodate approximately 658 fewer housing units than under the proposed project. Short-term construction emissions that would occur from construction of the 658 housing units would be avoided under the No Project Alternative. Similarly, non-residential development would be reduced under this alternative, resulting in reduced construction-related emissions as compared to the proposed project. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to comply with the Bay Area Air Quality Management District's (BAAQMD) and the Mendocino County Air Quality Management District's (MCAQMD) current recommended basic control measures. The No Project Alternative would have fewer overall construction-related impacts to air quality due to the reduced buildout.

As stated in Section 4.3, *Air Quality*, the greatest source of criteria pollutants in Ukiah is from transportation sources, specifically mobile emissions from roadway traffic. Considering 658 fewer residential units would be constructed in Ukiah under the No Project Alternative, the long-term on-site emissions from vehicle use would be reduced when compared to the proposed project. An overall reduction in total VMT would result in less operational emissions associated with mobile sources. However, the No Project Alternative would not include proposed Ukiah 2040 policies that support VMT reduction or electric vehicle adoption. These policies would ultimately reduce VMT per capita. Overall, operational air quality impacts for the No Project Alternative would also be significant and unavoidable. However, impacts from the No Project Alternative would be less than impacts from the proposed project, due to the reduction in overall VMT from reduced buildout.

Overall, the No Project Alternative would result in less infill development, leading to lower density development near stationary sources, freeways, and high-volume roadways. Therefore, the No Project Alternative would result in lower toxic air contaminants (TAC) near sensitive receptors when compared to the proposed project. However, as described in Section 4.3, *Air Quality*, the proposed project includes Ukiah 2040 goals and policies designed to promote clean air quality, protect public health and safety, and mitigate adverse air quality impacts. The No Project Alternative would not implement these policies. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to prepare a construction health risk assessment. The No Project Alternative would have fewer overall construction-related TAC impacts to air quality due to the reduced buildout.

Like the proposed project, construction activities under the No Project Alternative would generate odors, which would be temporary and limited to the constructed period. Similar to the proposed project, the No Project Alternative would have a less than significant impact regarding creation of objectionable odors.

Overall, the significance conclusions for the No Project Alternative would be the same as the proposed project; however, the severity of the impact would be less for the No Project Alternative due to the reduced buildout.

#### **d. Biological Resources**

As described in Section 4.4, *Biological Resources*, potential habitat suitable for special-status species occurs in streams, grasslands, riparian woodland, and forests within the Planning Area. The No Project Alternative would result in overall reduced development when compared to the proposed project; however, development under the No Project Alternative may potentially impact special-status species or their habitat, including riparian habitat and wildlife corridors. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to prepare a biological resources assessment, conduct pre-construction bird-surveys, roosting bird surveys, and apply bird-safe design. Impacts from the No Project Alternative would be slightly less, compared to the proposed project due to the reduction in buildout.

#### **e. Cultural Resources**

The No Project Alternative would have the potential to impact historic and archaeological resources in Ukiah through development of individual projects. Under the No Project Alternative, residential and nonresidential buildout would be less than for the proposed project; therefore, the No Project Alternative would have reduced, but still potentially significant impacts to historic and archaeological resources. Furthermore, in contrast to the proposed project, the No Project Alternative would not include updated General Plan goals and policies designed to preserve and

protect historic and archaeological resources in Ukiah. However, similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to require a historic and archaeological resources study. Nevertheless, as development under the No Project Alternative may result in the permanent loss or damage to historic structures, impacts under this alternative would be significant and unavoidable, like the proposed project.

#### **f. Greenhouse Gas Emissions**

Under the No Project Alternative, less development would occur, consistent with allowed existing zoning. Temporary construction-related greenhouse gas (GHG) emissions that result from grading and construction of new housing and non-residential development, as well as long-term impacts resulting from building operation (such as energy use, maintenance, and traffic) would be reduced when compared to the proposed project, as the No Project Alternative would involve decreased residential and non-residential buildout. However, the No Project Alternative would not include policies ENV-7.3 (Implement Clean Air Plan) and ENV-7.5 (Construction and Operations) within the Ukiah 2040 Environment and Sustainability Element, which are designed to reduce the impact of GHG emissions generated with construction activities.

Under existing conditions, Ukiah's General Plan does not outline how the City would meet State-mandated goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045. Therefore, the No Project Alternative would not be consistent with the California Executive Order B-55-18 goal of carbon neutrality by 2045 and would not include a qualified GHG reduction plan to guide progress towards State goals. Consequently, impacts related to generation of GHG emissions and consistency with State GHG reduction plans under the No Project Alternative would be potentially significant. Under the No Project Alternative, the CEQA GHG emissions threshold of significance and updated Climate Action Plan would not be implemented. As such, while the No Project Alternative would have less GHG emissions than the proposed project (due to the reduced buildout), the No Project Alternative would actually result in greater impacts on GHG emissions compared to the proposed project, because CEQA GHG emissions threshold of significance and an updated Climate Action Plan would not be implemented.

#### **g. Land Use and Planning**

Under the No Project Alternative, vacant/underutilized sites and annexation sites would retain their existing zoning, allowing future buildout in accordance with that zoning. The No Project Alternative would not alter connectivity with adjacent areas or divide established communities. Like the proposed project, future development under existing zoning would be required to comply with regulatory goals and policies, including the Ukiah Municipal Airport Land Use Compatibility Plan, the Ukiah Valley Area Plan, and Mendocino County Regional Transportation Plan, as discussed in Impact LU-2 in Section 4.7, *Land Use and Planning*. The No Project Alternative would result in less intensive future development, as it does not include new land use designations that would change the development density/intensity of residential and non-residential buildings. Consequently, the No Project Alternative would provide 658 fewer housing units than the proposed project and would not meet the project objectives to the extent that the proposed project would. Impacts regarding land use and planning would be less than significant, like the proposed project.

#### **h. Noise**

Buildout under the No Project Alternative would result in reduced development compared to the proposed project. Therefore, less construction and associated construction noise and vibration

would occur under the No Project Alternative as compared to the proposed project. Like the proposed project, construction noise under the No Project Alternative could temporarily increase noise levels, potentially affecting nearby noise-sensitive land uses and leading to a significant and unavoidable impact. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to implement construction noise reduction measures. However, construction noise could still exceed the significance threshold of 80 dBA  $L_{eq}$  during the daytime at residential uses. Furthermore, due to construction projects that could occur simultaneously in the same area and the potential duration of construction activities, construction impacts would remain significant and unavoidable, like the proposed project.

Noise generated by on-site stationary equipment for new development would be subject to the City's noise limits, like the proposed project. Adherence to Ukiah Municipal Code noise limits for heating, ventilation, and air conditioning (HVAC) units and other stationary noise sources associated with future development would ensure that operational stationary noise under the No Project Alternative is less than significant. However, the No Project Alternative would not include Ukiah 2040 policies designed to reduce operational noise impacts, and consequently, the No Project Alternative would have a greater impact to operational noise than the proposed project.

Implementation of the No Project Alternative could result in buildout, which would generate new vehicle trips that could incrementally increase the exposure of land uses along roadways to traffic noise. Although the No Project Alternative would result in reduced overall VMT, there would still be an increase in VMT compared to existing conditions and it is anticipated that a significant and unavoidable traffic noise impact would occur.

Development facilitated under the No Project Alternative could temporarily generate groundborne vibration during construction, potentially affecting nearby land uses. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to prepare a construction vibration control plan. Operation of future development under the No Project Alternative would not involve substantial vibration or groundborne noise. Thus, impacts involving groundborne vibration and noise would be similar to the impacts of the proposed project.

Residents and businesses facilitated by the No Project Alternative would not be served by the Ukiah Municipal Airport, except for emergency medical and fire services. Thus, development facilitated under this alternative would not result in significantly increased airport or airstrip activity. Continued regulation of airport noise consistent with State and federal regulations would minimize disturbance to people residing or working within proximity of the Ukiah Municipal Airport. Impacts would be less than significant, like the proposed project. However, since the No Project Alternative does not include Ukiah 2040 policies designed to reduce noise from the Ukiah Municipal Airport through disclosure, attenuation, and studies, impacts would be greater under this alternative than for the proposed project.

## **i. Population and Housing**

Under the No Project Alternative, existing land use designations and zoning would continue to define the type of development that occurs throughout Ukiah. Assuming a maximum buildout scenario, implementation of the No Project Alternative would accommodate approximately 1,579 fewer residents and 658 fewer housing units than would be accommodated by implementation of the proposed project (refer to Table 5-1). Thus, compared to the proposed project, the No Project Alternative would result in less population growth, and would not induce substantial unplanned population growth. The current General Plan provides for orderly development and growth. The displacement of people or housing units under the No Project Alternative would be minimal, as

development in Ukiah would continue in accordance with the existing General Plan. Impacts would be less than significant. When compared to the proposed project, the No Project Alternative would have reduced impacts to population and housing.

#### **j. Public Services and Recreation**

Development allowed by existing land use and zoning regulations would occur under the No Project Alternative, which would result in an increase to emergency calls in the area, as well as an increase in additional demand for schools, parks, libraries, recreational facilities, or other public services. Assuming a maximum buildout scenario, the No Project Alternative would add approximately 4,061 new residents to Ukiah, which is 1,579 fewer residents than the proposed project's 5,640 new residents. Thus, the increase in demand for public services under the No Project Alternative would be smaller than the proposed project's increase in demand. Impacts to public services and recreation would be less than the proposed project. Nonetheless, both would result in a less than significant impact.

#### **k. Transportation**

The No Project Alternative would result in development that follows the existing land use and zoning regulations. Goals and policies within the existing General Plan would apply under this alternative. Given the compliance with existing General Plan goals and policies that pertain to provision of "complete streets," increased connectivity, adequate emergency access, and safety design, the No Project Alternative would have a less than significant impact regarding conflict with circulation programs, plans, ordinances, or policies. The No Project Alternative would also have a less than significant impact regarding substantially increased transportation hazards and inadequate emergency access.

Development under the No Project Alternative would follow existing General Plan land use designations. However, the No Project Alternative would not include proposed Ukiah 2040 policies that support VMT reduction, which would ultimately reduce VMT per capita. The No Project Alternative could result in an increase to non-residential area (3,831,300 square feet) and residential units (1,692 units), relative to existing conditions. This buildout would add jobs and dwelling units to the City; however, compared to the proposed project, the ratio of jobs per dwelling units for the No Project Alternative would be greater than the proposed project. As such, the No Project Alternative would have a reduced land use diversity index compared to the proposed project. Overall, the No Project Alternative would result in greater VMT per capita impacts than the proposed project.

#### **l. Tribal Cultural Resources**

As discussed in Section 4.12, *Tribal Cultural Resources*, tribal cultural resource (TCR) impacts are highly dependent on the individual project site conditions and the characteristics of the proposed activity, including level of ground disturbance. Under the No Project Alternative, existing land use designations and zoning would continue to define the type of development that occurs throughout Ukiah. Like the proposed project, development facilitated under the No Project Alternative may involve excavation, which could potentially impact previously unidentified TCRs. The No Project Alternative would not include updated General Plan policies designed to preserve and protect TCRs; however, similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to avoid TCRs and follow protocols in the case of an unanticipated discovery.



Overall because the No Project Alternative would result in less development, the severity of impacts would be slightly less than the proposed project.

### **m. Utilities and Service Systems**

Development facilitated under the No Project Alternative would create additional demand for water, wastewater, electricity, natural gas, telecommunication, and stormwater drainage facilities. Any utility expansion within City limits or the Annexation Areas would be subject to existing Mendocino County Local Agency Formation Commission (LAFCo) and General Plan policies, which are intended to reduce potential impacts of utility expansion. In addition, similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to minimize impacts on the physical environment due to the installation of utilities. Although the No Project Alternative would not include Ukiah 2040 policies that require implementation of low impact development, energy conservation, and energy efficiency strategies, there are existing regulations that would require similar measures. Impacts involving utility expansion under the No Project Alternative would be less than significant, but slightly less than the proposed project because the No Project Alternative would have less development and, therefore, fewer utility connections.

As discussed in Section 4.13, *Utilities and Service Systems*, the City's Public Works Department would have adequate water supply to service the City's anticipated growth under the proposed project. Considering that development under the No Project Alternative would result in 1,579 fewer residents (assuming a maximum buildout scenario) than the proposed project, growth under the No Project Alternative would also be accommodated by the City's existing water system. Although development under the No Project Alternative would increase water demand, the City would continue to have sufficient water supply during normal, dry, and multiple dry years, and impacts to water supply would be less than significant.

Development facilitated under the No Project Alternative would increase demand for wastewater treatment. Like the proposed project, the timing, intensity, and location of an expansion of wastewater treatment facilities is unknown at this time. Like the proposed project, wastewater expansion for the No Project Alternative would require additional CEQA review, would be advanced when the wastewater expansion is advanced, and impacts would be less than significant. Considering the No Project Alternative would add 1,579 fewer residents to Ukiah (assuming a maximum buildout scenario), demand for wastewater and overall wastewater impacts would be less under the No Project Alternative than for the proposed project.

Implementation of the No Project Alternative would generate solid waste from construction and operation of development (including typical residential, commercial, and office solid waste). As discussed in Section 4.13, *Utilities and Service Systems*, the Ukiah Transfer Station would have adequate capacity to serve the population growth under the proposed project. Considering the No Project Alternative would result in 1,579 fewer people than the proposed project (assuming a maximum buildout scenario), the Ukiah Transfer Station would also accommodate population growth under this alternative. However, the No Project Alternative would not include Ukiah 2040 policies that focus on reducing solid waste generation and increasing recycling and composting. Like the proposed project, impacts involving solid waste under the No Project Alternative would be less than significant.

### **n. Wildfire**

Under the No Project Alternative, development under existing general plan and zoning regulations would be allowed on sites that are mapped within or near State Responsibility Areas and fire hazard

severity zones (FHSZ). There are approximately 387 acres of Very High FHSZ within the city limits of Ukiah, and approximately 2,670 acres of Very High FHSZ within the city's existing Sphere of Influence, as discussed in Section 4.14, *Wildfire*. Under the No Project Alternative, development could still occur within a FHSZ and the No Project Alternative would be subject to the same regulations as described for the proposed project, including the Ukiah City Code, which adopted State Responsibility Area (SRA) regulations for land within the City limits located in High or Very High FHSZs. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to reduce construction and design wildfire risk. Overall, the No Project Alternative would have a similar impact on wildfire than the proposed project.

### **o. Paleontological Resources**

As discussed in Section 4.15, *Paleontological Resources*, a portion of the City overlays the Quaternary terrace geologic unit, which has high paleontological sensitivity. Under the No Project Alternative, ground disturbance associated with buildout of existing General Plan land use designations, as well as development in Annexation Areas, may result in potentially significant impacts to paleontological resources. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to minimize impacts on paleontological resources. However, the No Project Alternative would involve less overall development than the proposed project, and thus would be less likely to impact paleontological resources.

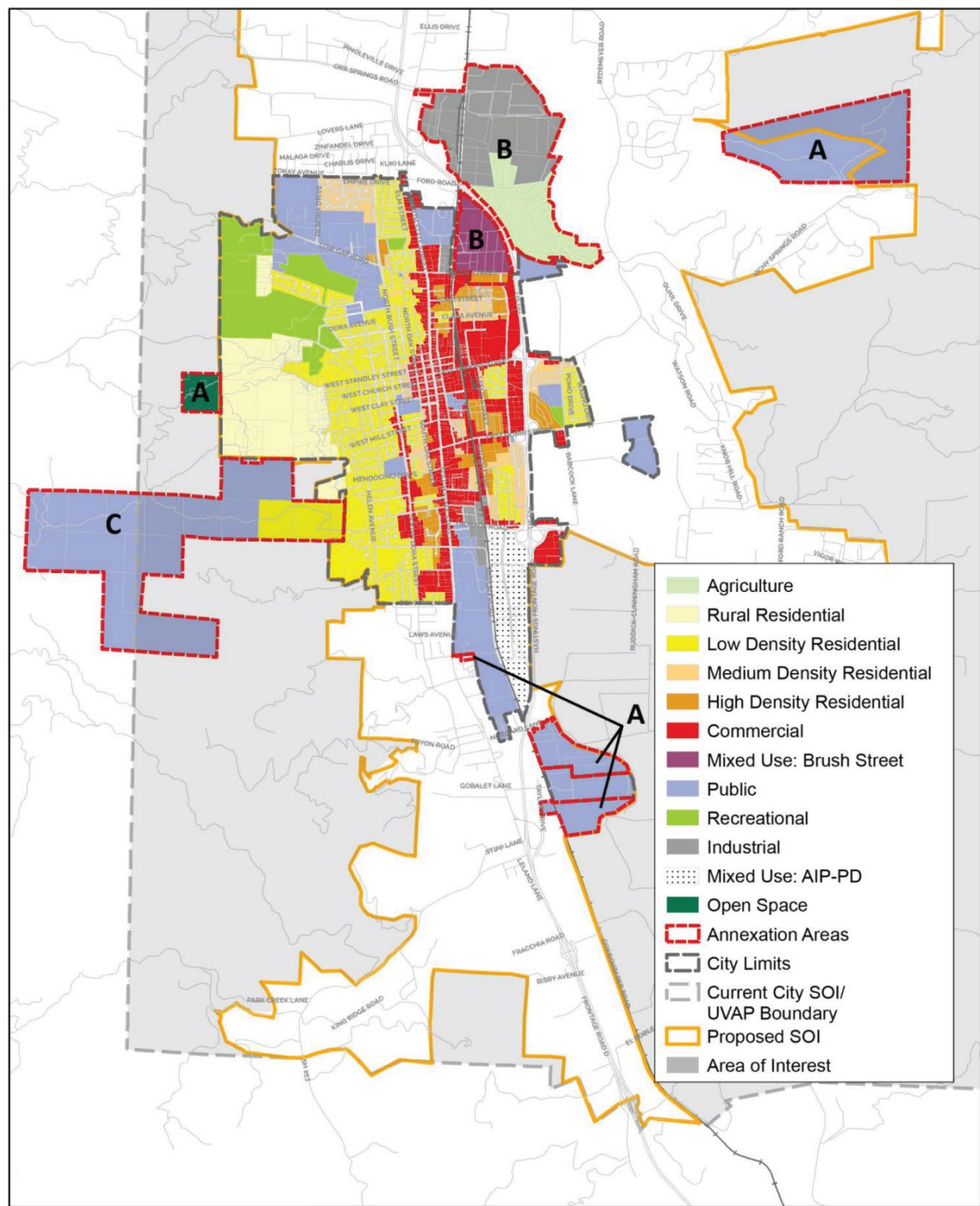
## **5.2 Alternative 2: Decreased Residential Density**

### **5.2.1 Description**

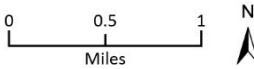
The Decreased Residential Density Alternative (Alternative 2) assumes increased residential densities (1,868 units total) allowed by each land use designation compared to the existing General Plan or No Project Alternative (1,692 units total) but decreased residential densities when compared to the proposed project (2,350 total units). For example, the existing General Plan allows High Density Residential development of up to 28 dwelling units per acre (du/ac) and the proposed project (as well as Alternative 2) would allow a density of up to 40 du/ac. Both the proposed project and Alternative 2 would apply new and/or existing General Plan land use designations to lands within the city limits and Annexation Areas. However, Alternative 2 would not add new land use designations intended to increase commercial land uses and would rely on existing General Plan land use designations (and densities). Because Alternative 2 would maintain the same designations as the General Plans for non-residential spaces, the buildout of non-residential space would be the same as the No Project Alternative. In addition, Alternative 2 would not add some of the new land use designations identified for the proposed project, which explains why Alternative 2 would have less residential units than the proposed project. Figure 5-1 shows the land use designations for Alternative 2.

Assuming a maximum buildout scenario, buildout under Alternative 2 would allow for 1,868 housing units and approximately 3,831,300 square feet of additional non-residential land uses (refer to Table 5-1). Non-residential development would be the same as the No Project Alternative but would be less than the proposed project. Resulting residential density would be less than the proposed project and more than the No Project Alternative. However, Alternative 2 would not accomplish project objectives to the extent that the proposed project would, as Alternative 2 would provide reduced housing options.

Figure 5-1 Alternative 2 Land Use Designations



Source: City of Ukiah, 2/2/2022; City of Ukiah, 2021; Mendocino County, 2011; Mendocino County, 2019.



## 5.2.2 Impact Analysis

### a. Aesthetics

Development under Alternative 2 would introduce a new land use pattern that would encourage increased residential density relative to the existing General Plan but less than the proposed project. Annexation areas would be given City land use designations and would potentially change the visual character of both the annexation areas as well as the overall City of Ukiah. However, impacts to visual character would be reduced when compared to the proposed project, as Alternative 2 would entail less overall residential and non-residential development. Similarly, impacts to scenic vistas and light and glare would be reduced under Alternative 2 when compared to the proposed project, as this alternative would involve less dense infill development. Nonetheless, development under Alternative 2 could affect aesthetics and would be required to comply with the same Ukiah City Code regulations as the proposed project. Both Alternative 2 and the proposed project would have less than significant impacts on aesthetics; however, the severity of the impact for Alternative 2 would be slightly less than for the proposed project. This is because the Alternative 2 would have less development than the proposed project.

### b. Agriculture and Forestry Resources

Development under Alternative 2 would continue the agricultural land use pattern currently in Ukiah, as no new agricultural land use designations would be introduced. Impacts to Farmland, land under Williamson Act contract, or regarding the conversion of agricultural land to non-agricultural use would be the same as the proposed project. There are no zoned Timber Production Zones or forest lands within City limits or proposed annexation areas. Thus, Alternative 2 would have no impact to forest land and would not result in the conversion of forest land to non-forest use, like the proposed project.

### c. Air Quality

Like the proposed project, buildout under Alternative 2 would not preclude planned transit or bike pathways and would not disrupt regional planning efforts to reduce VMT and meet federal and State air quality standards. Alternative 2 would be consistent with applicable 2017 Clean Air Plan control measures. Impacts regarding conflict with applicable air quality plans would be less than significant, the same as the proposed project.

Buildout from Alternative 2 would accommodate approximately 482 fewer housing units than under the proposed project. Short-term emissions that would occur from construction of the 482 housing units would be avoided under Alternative 2. Similarly, non-residential development would be reduced under this alternative, resulting in reduced construction-related emissions as compared to the proposed project. Additionally, Alternative 2 would implement Mitigation Measure AQ-1, (Implement BAAQMD and MCAQMD Basic Construction Mitigation Measures), which would further reduce construction impacts to air quality. Alternative 2 would have fewer overall construction-related impacts to air quality. Like the proposed project, air quality impacts from construction of Alternative 2 would be less than significant with mitigation; however, Alternative 2 would have fewer overall construction-related impacts to air quality due to the reduced buildout.

As stated in Section 4.3, *Air Quality*, the greatest source of criteria pollutants in Ukiah is from transportation sources, specifically mobile emissions from roadway traffic. Considering 482 fewer residential units would be constructed in Ukiah under this alternative, the long-term on-site

emissions from vehicle use would be reduced when compared to the proposed project. An overall reduction in VMT would result in less operational emissions associated with mobile sources. Like the proposed project, Alternative 2 would implement Mitigation Measure AQ-2, (Implement Measures to Reduce Operational Emissions), which would reduce operational impacts to air quality. Nonetheless, operational air quality impacts for Alternative 2 would also be significant and unavoidable.

Overall, Alternative 2 would result in less infill development than the proposed project, leading to lower density development near stationary sources, freeways, and high-volume roadways. Therefore, Alternative 2 would result in lower TAC near sensitive receptors when compared to the proposed project. However, as described in Section 4.3, *Air Quality*, the proposed project includes Ukiah 2040 goals and policies designed to promote clean air quality, protect public health and safety, and mitigate adverse air quality impacts. Alternative 2 would implement these policies and would also require Mitigation Measure AQ-2 (Conduct Construction Health Risk Assessment) to reduce impacts to a less than significant level.

Like the proposed project, construction activities under Alternative 2 would generate odors, which would be temporary and limited to the constructed period. Similar to the proposed project, Alternative 2 would have a less than significant impact regarding creation of objectionable odors.

Overall, the significance conclusions for Alternative 2 would be the same as the proposed project.

#### **d. Biological Resources**

As described in Section 4.4, *Biological Resources*, potential habitat suitable for special-status species occurs in streams, grasslands, riparian woodland, and forests within the Planning Area. Alternative 2 would result in overall reduced development when compared to the proposed project; however, development under Alternative 2 may potentially impact special-status species or their habitat, including riparian habitat and wildlife corridors. Mitigation Measures BIO-1 (Biological Resource Assessment), BIO-2 (Pre-Construction Bird Surveys, Avoidance, and Notification), BIO-3 (Roosting Bat Surveys and Avoidance Prior to Removal) and BIO-4 (Bird Safe Design) would be implemented for Alternative 2 and would help reduce associated biological resource impacts, similar to the proposed project. Overall, impacts to biological resources under Alternative 2 would be less than significant with mitigation incorporated, like the proposed project. Impacts from Alternative 2 would be slightly less, compared to the proposed project due to the reduction in buildout.

#### **e. Cultural Resources**

Under Alternative 2, less residential and nonresidential development than under the proposed project would occur; however, individual projects would have the potential to impact historic and archaeological resources. Alternative 2 would have reduced, but still potentially significant impacts to historic and archaeological resources. Like the proposed project, Alternative 2 would include Mitigation Measures CUL-1 (Historic Resources Study Program) and CUL-2 (Archaeological Resources Study Program), which require project applicants to investigate the potential to disturb historic or archaeological resources. Like the proposed project, Alternative 2 would include updated General Plan goals and policies designed to preserve and protect historic and archaeological resources in Ukiah. Development under Alternative 2 may result in the permanent loss or damage to historic structures, impacts under this alternative would be significant and unavoidable, like the proposed project.

## **f. Greenhouse Gas Emissions**

Less development would occur under Alternative 2 and temporary construction-related GHG emissions that result from grading and construction of new housing and non-residential development, as well as long-term impacts resulting from building operation (such as energy use, maintenance, and traffic) would be reduced when compared to the proposed project. Alternative 2 would include Policies ENV-7.3 (Implement Clean Air Plan) and ENV-7.5 (Construction and Operations) within the Ukiah 2040 Environment and Sustainability Element, which are designed to reduce the impact of GHG emissions generated with construction activities.

Under existing conditions, Ukiah's General Plan does not outline how the City would meet State-mandated goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045. Therefore, Alternative 2 would not be consistent with the California Executive Order B-55-18 goal of carbon neutrality by 2045 and would not include a qualified GHG reduction plan to guide progress towards State goals. Consequently, impacts related to generation of GHG emissions and consistency with State GHG reduction plans under Alternative 2 would be potentially significant. Like the proposed project, Alternative 2 would implement Mitigation Measure GHG-1, through which the City would add a new General Plan policy to prepare, adopt, and implement a CEQA GHG emissions threshold of significance; and Mitigation Measure GHG-2, which would require the City to update Ukiah's Climate Action Plan to meet State goals of 40 percent below 1990 emissions levels and 2045 goal of carbon neutrality. Implementation of these mitigation measures would ensure development under Alternative 2 would be consistent with State emissions goals; however, individual projects that occur prior to adoption of the Climate Action Plan under MM GHG-2 may not be consistent. While overall GHG emissions impacts under Alternative 2 would be reduced when compared to the proposed project, such impacts would remain significant and unavoidable.

## **g. Land Use and Planning**

While Alternative 2 would increase the intensity of development for residential land uses compared to the No Project Alternative (but decrease residential land uses when compared to the proposed project), such uses would be consistent with updated residential land use designations and would not conflict with Ukiah's General Plan or Zoning Ordinance. Overall, Alternative 2 would result in less intensive future development, as it does not include new land use designations that would change the development intensity of non-residential buildings and would provide 482 fewer housing units than the proposed project. Alternative 2 would not alter connectivity with adjacent areas or divide established communities. Like the proposed project, future development under existing zoning would be required to comply with regulatory goals and policies, including the Ukiah Municipal Airport Land Use Compatibility, the Ukiah Valley Area Plan, and Mendocino County Regional Transportation Plan, as discussed in Impact LU-2 within Section 4.7, *Land Use and Planning*. Impacts regarding land use and planning would be less than significant, like the proposed project.

## **h. Noise**

Buildout under Alternative 2 would result in reduced development compared to the proposed project. Therefore, less construction and associated construction noise and vibration would occur under Alternative 2 as compared to the proposed project. Like the proposed project, construction noise under Alternative 2 could temporarily increase noise levels, potentially affecting nearby noise-sensitive land uses and leading to a significant and unavoidable impact. Alternative 2 would implement Mitigation Measure NOI-1 (Construction Noise Reduction Measures), which would help reduce construction noise. However, implementation of Mitigation Measure NOI-1 would not



ensure that construction noise impacts would be reduced to below the significance threshold of 80 dBA Leq during the daytime at residential uses. Furthermore, due to construction projects that could occur simultaneously in the same area and the potential duration of construction activities, construction impacts would remain significant and unavoidable under Alternative 2, like the proposed project.

Noise generated by on-site stationary equipment for new development would be subject to the City's noise limits, like the proposed project. Adherence to Ukiah Municipal Code noise limits for HVAC units and other stationary noise sources associated with future development would ensure that operational stationary noise under Alternative 2 is less than significant.

Implementation of Alternative 2 could result in buildout, which would generate new vehicle trips that could incrementally increase the exposure of land uses along roadways to traffic noise. Although Alternative 2 would result in reduced overall VMT, there would still be an increase in VMT compared to existing conditions and a significant and unavoidable traffic noise impact would occur.

Development facilitated under Alternative 2 could temporarily generate groundborne vibration during construction, potentially affecting nearby land uses. Mitigation Measure NOI-2 (Construction Vibration Control Plan) would require implementation of measures to reduce vibration impacts during construction. Operation of future development under Alternative 2 would not involve substantial vibration or groundborne noise. Thus, impacts involving groundborne vibration and noise would be less than significant with mitigation incorporated, like the proposed project.

The redesignation of three parcels in the far northwestern corner of the community, which are currently designated Rural Residential, would not result in significant noise impacts, as these parcels would have a Recreational designation and are currently developed with recreation uses.

Residents and businesses facilitated by Alternative 2 would not be served by the Ukiah Municipal Airport, except for emergency medical and fire services. Thus, development facilitated under this alternative would not result in significantly increased airport or airstrip activity. Continued regulation of airport noise consistent with State and federal regulations would minimize disturbance to people residing or working within proximity of the Ukiah Municipal Airport. Impacts would be less than significant, like the proposed project. In addition, Alternative 2 would include Ukiah 2040 policies designed to reduce noise from the Ukiah Municipal Airport through disclosure, attenuation, and studies; therefore, impacts would be the same under this alternative than the proposed project.

## **i. Population and Housing**

Under Alternative 2, land use designations within Ukiah would allow for increased residential density when compared to the No Project Alternative; however, the existing General Plan land use designations would continue to define Ukiah's development pattern. Assuming a maximum buildout scenario, implementation of Alternative 2 would accommodate approximately 1,157 fewer residents and 482 fewer housing units than would be accommodated by implementation of the proposed project (refer to Table 5-1). Thus, compared to the proposed project, Alternative 2 would result in less population growth, and would not induce substantial unplanned population growth.

The current General Plan provides for orderly development and growth. The displacement of people or housing units under Alternative 2 would be minimal, as development in Ukiah would continue in accordance with the General Plan. Impacts would be less than significant. When compared to the proposed project, Alternative 2 would have reduced impacts to population and housing.

## **j. Public Services and Recreation**

When compared to the No Project Alternative, increased buildout from Alternative 2 would result in an increase to emergency calls in the area, as well as an increase in additional demand for schools, parks, libraries, recreational facilities, or other public services. Assuming a maximum buildout scenario, Alternative 2 would add approximately 4,483 new residents to Ukiah when compared to the No Project Alternative; however, this is 1,157 fewer residents than the proposed project's 5,640 new residents. Thus, the increase in demand for public services under Alternative 2 would be smaller than the proposed project's increase in demand. Impacts to public services and recreation would be less than the proposed project. Nonetheless, both would result in a less than significant impact.

## **k. Transportation**

For the same reasons as the proposed project, Alternative 2 would have a less than significant impact regarding conflict with circulation programs, plans, ordinances, or policies; substantially increased transportation hazards and inadequate emergency access. Development under Alternative 2 would primarily follow existing General Plan land use designations, along with increased residential density. Alternative 2 could result in an increase to non-residential area (3,831,300 square feet) and residential units (1,868 units), relative to existing conditions. This buildout would add jobs and dwelling units to the City; however, compared to the proposed project, the ratio of jobs per dwelling units for Alternative 2 would be greater than the proposed project. As such, Alternative 2 would have a reduced land use diversity index compared to the proposed project. Overall, Alternative 2 would result in greater VMT per capita impacts than the proposed project.

## **l. Tribal Cultural Resources**

Like the No Project Alternative and proposed project, development facilitated under Alternative 2 may involve excavation, which could potentially impact previously unidentified TCRs. Alternative 2 would include Mitigation Measures TCR-1 (Avoidance of Tribal Cultural Resources) and TCR-2 (Unanticipated Discovery). Implementation of these mitigation measures would reduce potential impacts to TCRs from development facilitated by this alternative to less than significant levels by requiring avoidance and monitoring in areas identified as sensitive for TCRs. As Alternative 2 would include the same mitigation as the proposed project, impacts to TCRs would be less than significant with mitigation incorporated. Overall because Alternative 2 would result in less development than the proposed project, the severity of impacts would be slightly less than the proposed project.

## **m. Utilities and Service Systems**

Development facilitated under Alternative 2 would create additional demand for water, wastewater, electricity, natural gas, telecommunication, and stormwater drainage facilities compared to the No Project Alternative. Any utility expansion within City limits or the Annexation Areas would be subject to proposed Ukiah 2040 policies and mitigation measures identified throughout the Alternative 2 analysis, which would reduce potential impacts of utility expansion. Thus, impacts involving utility expansion under Alternative 2 would be less than significant, same as the proposed project and No Project Alternative.

As discussed in Section 4.13, *Utilities and Service Systems*, the City's Public Works Department would have adequate water supply to service the City's anticipated growth under the proposed

project. Alternative 2 would add approximately 4,483 new residents to Ukiah when compared to the No Project Alternative; however, this is 1,157 fewer residents than the proposed project's 5,640 new residents. As such, growth under Alternative 2 would also be accommodated by the City's existing water system. Although development under Alternative 2 would increase water demand, the City would continue to have sufficient water supply during normal, dry, and multiple dry years, and impacts to water supply would be less than significant.

Development facilitated under Alternative 2 would increase demand for wastewater treatment. Like the proposed project and No Project Alternative, the timing, intensity, and location of an expansion of wastewater treatment facilities is unknown at this time. Like the proposed project and No Project Alternative, wastewater expansion for Alternative 2 would require additional CEQA review, would be advanced when the wastewater expansion is advanced, and impacts would be less than significant. However, considering Alternative 2 would add approximately 4,483 new residents to Ukiah when compared to the No Project Alternative but 1,157 fewer residents to Ukiah when compared to the proposed project, demand for wastewater and overall wastewater impacts would be less under Alternative 2 than for the proposed project.

Implementation of Alternative 2 would generate solid waste from construction and operation of development (including typical residential, commercial, and office solid waste). As discussed in Section 4.13, *Utilities and Service Systems*, the Ukiah Transfer Station would have adequate capacity to serve the population growth under the proposed project. Considering Alternative 2 would add approximately 4,483 new residents to Ukiah when compared to the No Project Alternative but 1,157 fewer people than the proposed project, the Ukiah Transfer Station would also accommodate population growth under this alternative. Impacts involving solid waste would be less than significant, like the proposed project and No Project Alternative.

#### **n. Wildfire**

Development facilitated under Alternative 2 would occur primarily as infill and redevelopment within the urbanized areas of Ukiah. However, Alternative 2 would increase residential land use densities when compared to the No Project Alternative, and consequently may result in increased residential exposure to wildfire or risks involving wildfires, especially in the western area of the City, where residential development overlaps with High and Very High FHSZ. However, like the proposed project, Alternative 2 would implement Mitigation Measure WFR-1, which would require wildfire risk reduction during project construction, as well as Mitigation Measure WFR-2, which outlines project design wildfire risk reduction criteria. In addition, any new development within or near a High or Very High FHSZ would be required to the SRA regulations pursuant to the Ukiah City Code, as described in Section 4.14, *Wildfire*. As such, like the proposed project, impacts would be less than significant with mitigation.

#### **o. Paleontological Resources**

As discussed in Section 4.15, *Paleontological Resources*, the City overlay the Quaternary terrace geologic unit, which has high paleontological sensitivity. Like the No Project Alternative and the proposed project, ground disturbance associated with Alternative 2 may result in potentially significant impacts to paleontological resources. However, Alternative 2 would involve less overall development than the proposed project and thus would be less likely to impact paleontological resources. Like the proposed project, implementation of Mitigation Measure PAL-1 (Retention of Qualified Professional Paleontologist) would reduce adverse impacts associated with construction activities. Like the proposed project, Alternative 2 would include Ukiah 2040 policies designed to

protect archaeological resources, including paleontological resources. Impacts to paleontological resources under Alternative 2 would be less than significant with mitigation incorporated, and less than the proposed project.

### 5.3 Alternatives Considered but Rejected

The following summarizes those alternatives considered, but ultimately rejected for inclusion in the analysis as they would not meet most of the project objectives, would not substantially reduce impacts compared to the proposed project, or were determined to be infeasible.

The City considered an alternative that would require an update to the zoning code to include requiring noise barriers to reduce construction noise for development on project sites. Noise barriers would reduce on-site noise by about 10 to 20 dBA depending on construction materials and barrier height, since noise barriers are traditionally constructed of material with a minimum weight of 2 pounds per square foot with no gaps or perforations. Noise barriers may be constructed of, but are not limited to, 5/8-inch plywood, 5/8-inch oriented strand board, or hay bales. This alternative, which would require noise barriers that would reduce construction noise, could reduce the significant construction noise impact, but would not reduce the significant and unavoidable operational noise impact. Additionally, construction of noise barriers could result in increased impacts associated with ground disturbance (such as those related to biological resources, geology and soils, air quality, etc.) and visual impacts. Lastly, this alternative would meet project objectives to provide housing, but fewer housing units would likely be built, because development on certain sites would be infeasible due to construction cost constraints.

### 5.4 Environmentally Superior Alternative

CEQA requires identification of the environmentally superior alternative among the alternatives to the proposed project. The environmentally superior alternative must be an alternative that reduces some of the project's environmental impacts, regardless of the financial costs associated. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as the environmentally superior alternative may not be that which best meets the goals or needs of the proposed project. Table 5-2 indicates whether each alternative's environmental impact is greater than, less than, or equal to the proposed project for each of the issue areas studied.

Overall, none of the alternatives identified in this analysis changed the impact conclusions that were identified for the proposed project. However, some of the alternatives did reduce the severity of the impact; thus, this analysis considers the severity of the impact to identify the environmentally superior alternative. Based on the analysis of alternatives in this section, the No Project Alternative is the environmentally superior alternative as it lessens the severity of most impacts of the proposed project. Because the No Project Alternative would reduce overall development (residential and non-residential) compared to the proposed project, the overall impacts from construction would also be reduced since there would be less construction. For example, potential impacts on air quality construction emissions, biological resources, cultural resources, temporary noise, tribal cultural resources, and paleontological resources would be reduced due to less area being affected (i.e., excavated, graded, etc.) and due to less use of construction equipment. In addition, operationally there would be reduced aesthetic impacts because there would be fewer buildings; less air quality emissions because there would be less overall VMT; less operational noise

because there would be less traffic and fewer HVAC units; and less demand for public services, recreation, and utilities. The No Project Alternative, however, would introduce less diversity of land uses than the proposed project and would result in greater transportation impacts than the proposed project. Furthermore, the No Project Alternative would have greater GHG impacts because CEQA GHG emissions threshold of significance and an updated Climate Action Plan would not be implemented for the No Project Alternative. In addition, this alternative would not meet the project objectives, as it would have reduced housing options and exclude all policies from Ukiah 2040.

If the No Project Alternative is determined to avoid or reduce more impacts than any other alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e]). Of the other alternatives evaluated in this EIR, the Decreased Residential Density Alternative (Alternative 2) would be the environmentally superior alternative. Like the No Project Alternative, Alternative 2 would result in less construction impacts (air quality construction emissions, biological resources, cultural resources, greenhouse gas emissions, temporary noise, tribal cultural resources, and paleontological resources) than the proposed project because of a reduction in buildout. In addition, Alternative 2 would result in less operational impacts (aesthetics, air quality, greenhouse gas emissions, noise, public services, recreation, and utilities) due to the reduced buildout. Nonetheless, compared to the proposed project, Alternative 2 would not fulfill the project objectives as well. This is because the proposed project would offer more housing opportunities and a diversity of land uses for future Ukiah residents.

Pursuant to CEQA requirements, Alternative 2 would be considered the environmentally superior alternative; however, the proposed project would offer benefits that would not be achieved by Alternative 2, primarily housing opportunities and a diversity of land uses.

**Table 5-2 Impact Comparison of Alternatives**

<b>Issue</b>	<b>Proposed Project Impact Classification</b>	<b>Alternative 1: No Project</b>	<b>Alternative 2: Decreased Residential Density</b>
Aesthetics	Less than Significant	+	+
Agriculture and Forestry Resources	Less than Significant	=	=
Air Quality	Significant and Unavoidable	+	+
Biological Resources	Less than Significant with Mitigation Incorporated	+	+
Cultural Resources	Significant and Unavoidable	+	+
Greenhouse Gas Emissions	Significant and Unavoidable	-	+
Land Use and Planning	Less than Significant	=	=
Noise	Significant and Unavoidable	+	+
Population and Housing	Less than Significant	+	+
Public Services and Recreation	Less than Significant	+	+
Transportation	Less than Significant	-	-
Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	+	+
Utilities and Service Systems	Less than Significant	+	+

Issue	Proposed Project Impact Classification	Alternative 1: No Project	Alternative 2: Decreased Residential Density
Wildfire	Less than Significant with Mitigation Incorporated	=	=
Paleontological Resources	Less than Significant with Mitigation Incorporated	+	+
+ Superior to the proposed project (reduced level of impact) - Inferior to the proposed project (increased level of impact) = Similar level of impact to the proposed project			



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## 6 Other CEQA Required Discussions

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This section discusses other issues for which the California Environmental Quality Act (CEQA) requires analysis in addition to the specific issue areas discussed in Section 4, *Environmental Impact Analysis*. These additional issues include the project's potential to induce growth and create significant and irreversible impacts on the environment.

### 6.1 Growth Inducement

*CEQA Guidelines* Section 15126.2(d) requires a discussion of a project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. A project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

#### 6.1.1 Population and Economic Growth

This Environmental Impact Report (EIR) identifies a maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. The following estimate of population growth is a conservative estimate based on the maximum buildout scenario. As discussed in EIR Section 2, *Project Description*, buildout of the project in the maximum buildout could accommodate an estimated 2,350 additional housing units and 5,640 additional residents in the City. The land use plan and policies in Ukiah 2040 prioritize infill development, reuse of underutilized parcels, contiguous development, high-density and mixed-use design, compactness, and consistency with existing uses within City boundaries to support growth in areas already well-served by existing public facilities and services.

Under the maximum buildout scenario, Ukiah 2040 could result in an increase of approximately 4,514,80 square feet of nonresidential development that would generate permanent employment opportunities in the City for residents. Additionally, Ukiah 2040 would generate temporary employment opportunities during construction of future residential and nonresidential projects. As construction workers would be expected to be drawn from the existing regional work force, construction of future development projects would not be considered growth-inducing.

As discussed in Section 2, *Project Description*, the City contains approximately 120 acres of vacant parcels, with the rest of the City occupied by development or open space. Due to the availability of developable areas, any economic expansion induced by the project is not anticipated to result in direct physical environmental effects beyond those described throughout Section 4, *Environmental Impact Analysis*. Specifically, buildout is projected to occur within the existing City limits and Annexation Areas. Future development within the remaining sphere of influence (SOI) and Planning Area will be analyzed under CEQA on a project-level basis.

### 6.1.2 Removal of Obstacles to Growth

The land use plan and policies in Ukiah 2040 prioritize infill development, reuse of underutilized parcels, contiguous development, high-density and mixed-use design, compactness, and consistency with existing uses within City boundaries to support growth in areas already well-served by existing public facilities and services. New development would occur primarily where existing roads, water, and sewer and other utilities are in place and in a manner that minimizes the impact of development on existing infrastructure and services. Despite the anticipated change in land use designations, the project would generally preserve the existing pattern of land uses in the City.

As described in Section 2.7.6, *Proposed Annexation Areas*, the City of Ukiah is pursuing approximately 1,617 acres of County-owned land for annexation. The annexation areas are split into three distinct categories. The first, Annexation Area A, consists of 16 City-owned properties that currently host City operations, such as landfill, airport, and wastewater treatment uses. Once annexed, Annexation Area A would continue to be utilized as agriculture, open space, or municipal uses and the lands would be designated as Public and Open Space. Annexation Area B consists of 63 properties containing commercial, industrial, and manufacturing uses (both existing and decommissioned), as well as areas containing vacant and agricultural lands. Once annexed, most of Annexation Area B would be designated by the City as a new land use category proposed under Ukiah 2040, Mixed-Use: Brush Street Triangle, which is consistent with its existing designation under the UVAP. Other portions of Annexation Area B would be designated as Industrial, while the lands currently vacant or developed with agriculture uses would be designated as Agriculture. Annexation Area C is being pursued as part of the Open Land Acquisition and Limited Development Agreement Project, most of which is pre-zoned as Public Facilities and would be preserved for open space conservation. The remaining portions of Annexation Area C are pre-zoned as Rural Residential with a Single-Family Residential-Hillside Overlay designation. However, development on these parcels would be restricted to a maximum number of 14 units total (seven-single family homes and seven accessory dwelling units) due to the existing Development Agreement with the current property owner.

By maintaining the current land uses associated with Annexation Areas A and B, limiting residential development on Annexation Area C, and focusing most of the development in the City within already urbanized areas, implementation of Ukiah 2040 would reduce the growth pressure in undeveloped areas along the periphery of the City. This constrained growth pressure would reduce the potential for impacts as compared to development on lands beyond urban limits. Furthermore, Ukiah 2040 does not include development within the proposed SOI or the larger Planning Area. Any future uses developed within the proposed SOI would be subject to annexation to the City of Ukiah in compliance with procedures identified by the Mendocino County Local Agency Formation Commission. Future land use designations within the SOI or Planning Area are not specifically defined or included within the buildout assumptions of Ukiah 2040. Because Ukiah 2040 does not include any future development, utilities, or transportation improvements in the proposed SOI or Planning Area, the project would not result in the removal of an obstacle to growth.

## 6.2 Irreversible Environmental Effects

When an EIR evaluates a project that would amend public plans, ordinances, or policies, the *CEQA Guidelines* require a discussion of significant irreversible environmental changes. CEQA also requires decision-makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. This section addresses

nonrenewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the development that would be facilitated by implementation of Ukiah 2040.

Construction activities associated with future development that would be accommodated under Ukiah 2040 would require the use of building materials and energy, some of which are nonrenewable resources. Consumption of these resources would occur with any development in the region and are not unique to Ukiah or Ukiah 2040.

Growth facilitated by Ukiah 2040 would require an irreversible commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. As discussed in Sections 4.10, *Public Services and Recreation*, and 4.13, *Utilities and Service Systems*, potential impacts to public services and utilities would be less than significant following implementation of policies included in Ukiah 2040, as well as future environmental review that would be required for any future facilities needed to accommodate Ukiah 2040.

The anticipated increase in vehicle trips associated with buildout of Ukiah 2040 would incrementally contribute to local traffic, air quality emissions, greenhouse gas emissions, and noise. As described in Section 4.11, *Transportation*, impacts on transportation were found to be less than significant through adherence to the proposed goals and policies in Ukiah 2040 and because the City's diversity score with Ukiah 2040 would remain below the existing countywide average. Impacts related to air quality were determined to be less than significant with mitigation, except for the impacts related to criteria air pollutants due to operational emissions from traffic. As discussed in Section 4.3, *Air Quality* of this EIR, overall VMT would increase, and operational emission impacts would be significant and unavoidable even after the application of mitigation to reduce air quality emissions during the operation phase of future projects. Impacts related to greenhouse gas emissions were found to be significant and unavoidable. As discussed in Section 4.6, *Greenhouse Gas Emissions* of this EIR, although Ukiah 2040 proposed goals and policies would assist in reducing emissions and although mitigation measures would require that the City implement CEQA greenhouse gas emissions thresholds and update the Ukiah Climate Action Plan to establish a Citywide greenhouse gas reduction target, the project's impacts related to greenhouse gas emissions would remain significant and unavoidable until the CEQA greenhouse gas thresholds are adopted and the Climate Action Plan is updated. Impacts related to construction and operational traffic noise were found to be significant and unavoidable. As discussed in Section 4.8, *Noise* of this EIR, although mitigation and policies would be implemented to minimize construction noise, it cannot be ensured that construction noise would be reduced below noise thresholds and impacts would conservatively remain significant and unavoidable. In addition, as discussed in Section 4.8, *Noise* of this EIR, noise along Brush Street due to increases in traffic was found to be significant and unavoidable.

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## 7.2 List of Preparers

This EIR was prepared by the City of Ukiah, with the assistance of Rincon Consultants, Inc. Consultants, and GHD. Consultant staff involved in the preparation of the EIR are listed below.

### **RINCON CONSULTANTS, INC.**

Darcy Kremin, Director-in-Charge  
 Leo Mena, Senior Environmental Planner, Project Manager  
 Gianna Meschi, Environmental Planner, Assistant Project Manager  
 Josh Carman, Director  
 Christian Knowlton, Biologist  
 Kristin Asmus, Senior Biologist and Senior Project Manager  
 Theadora Fuerstenberg, Senior Project Manager  
 Rachel Perzel, Senior Architectural Historian  
 Andrew Rodriguez, Assistant Architectural Historian  
 Nicholas Carter, Environmental Planner  
 Taylor Freeman, Environmental Planner  
 Rachel Irvine, Environmental Planner  
 Kayleigh Limbach, Environmental Planner  
 Jesse Voremberg, Environmental Planner  
 Max Antono, GIS Analyst  
 Kat Castanon, GIS Analyst  
 Gina Gerlich, GIS Analyst  
 Chris Jackson-Jordan, GIS Analyst  
 Isabelle Radis, GIS Analyst  
 Allysen Valencia, GIS Analyst

### **GHD**

Colin Burgett, Senior Project Manager  
 Donald Hubbard, Technical Director  
 Todd Tregenza, Senior Transportation Project Manager

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# Appendix A

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Notice of Preparation and Scoping Comments Received



## **NOTICE OF PREPARATION**

### **City of Ukiah General Plan Update**

**Date:** May 31, 2022

**To:** Reviewing Agencies, Interested Parties, and Organizations

**Subject:** Notice of Preparation of a Draft Environmental Impact Report for the City of Ukiah General Plan Update

The City of Ukiah (City) is preparing an update to the City's General Plan. The City has determined that an Environmental Impact Report (EIR) will be necessary to evaluate environmental impacts of the General Plan Update pursuant to the California Environmental Quality Act (CEQA). In compliance with CEQA, the City will be the Lead Agency and will prepare the EIR. The City is requesting comments and guidance on the scope and content of the EIR from responsible and trustee agencies, interested public agencies, organizations, and the general public (CEQA Guidelines Section 15082).

This Notice of Preparation (NOP) provides a summary of the General Plan Update; includes the City's preliminary identification of the potential environmental issues to be analyzed in the EIR; and provides information on how to comment on the scope of the EIR.

**Notice of Preparation Public Review Period:** May 31 to June 30, 2022

The City requests your careful review and consideration of this notice, and it invites any and all input and comments from interested agencies, persons, and organizations regarding the preparation of the EIR. Comments and responses to this notice must be in writing and submitted to the Lead Agency Contact through June 30, 2022 at 5:00 p.m. If applicable, please indicate a contact person for your agency or organization. If your agency is a responsible agency as defined by CEQA Guidelines Section 15381, your agency may use the environmental documents prepared by the City when considering permits or approvals for action regarding the project.

**Lead Agency Contact:**

Craig Schlatter, Director of Community Development  
City of Ukiah Community Development Department  
300 Seminary Avenue  
Ukiah, California 95482  
[cschlatter@cityofukiah.com](mailto:cschlatter@cityofukiah.com)

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**Written Comments:** Please submit written comments within 30 days of the date of this notice to any of the below by 5:00 p.m. on June 30, 2022:

- Email: [cschlatter@cityofukiah.com](mailto:cschlatter@cityofukiah.com)
- Regular Mail: Craig Schlatter, Community Development Department, City of Ukiah, 300 Seminary Avenue, Ukiah, California 95482

**Public Scoping Meeting:** The City will hold a virtual scoping meeting to provide an opportunity for agency staff and interested members of the public to submit written and oral comments on the scope of the environmental issues to be addressed in the EIR. The scoping meeting will be held on **Wednesday, June 15, 2022, at 6:15 p.m.** or as soon thereafter as can be heard.

The scoping meeting will be held in a hybrid format, with the option of attending in person at the Civic Center Council Chamber, 300 Seminary Avenue, Ukiah, CA 95482 or via teleconference. Agenda details, including the teleconference link and call-in information will be included on the agenda posted to the City website, <http://www.cityofukiah.com/meetings/> and at the Civic Center Agenda Board no less than 72 hours prior to the meeting.

To view the meeting without participating or to watch a recorded version of the scoping presentation once it is available to view after June 16, 2022, visit <http://www.cityofukiah.com/meetings/>.

**Project Background:** The City must update its General Plan to ensure it is internally consistent and maintains a balance of land uses; maintains and supports quality-of-life, community satisfaction, and safety for all residents; and meets new State requirements. A Regional Location map is included as Figure 1.

**Project Location:** The General Plan Update will encompass the City of Ukiah city limits and its Sphere of Influence (Figure 2).

**Proposed Project:** The Ukiah General Plan update will serve as a long-term framework for future growth and development. The General Plan represents the community's view of its future and contains the goals and policies upon which the City Council, Planning Commission, staff, and the entire community will base land use and resource decisions. To provide a contemporary plan that will guide the community through the year 2040, the General Plan update will reflect recent development decisions and changes in State law. Major components of the Ukiah General Plan Update will include the following elements:

- **Land Use Element.** This element will consider current and proposed land use amendments as depicted in Figure 3.
- **Economic Development Element.** This element will focus on goals and policies to promote and further economic development, job retention, and fiscal sustainability within Ukiah.
- **Agricultural Element.** This element will focus on goals and policies to conserve agricultural resources within Ukiah.
- **Mobility Element.** This element will address existing and planned vehicle, pedestrian, and bicycle infrastructure across the City.
- **Public Facilities, Services, and Infrastructure Element.** This element will focus on goals and policies related to public services, including but not limited to police, fire, airport, recreation, water/wastewater, and emergency services.

- **Environment and Sustainability Element.** This element will address the wide variety of parks, trails, and open spaces serving the diverse recreation needs of Ukiah residents, particularly youth, and emphasize the unique features of the City's natural environment. This element will also consider the effects of existing and planned development on natural resources located on public lands.
- **Hazards and Safety Element.** This element will cover seismic activity, other geologic hazards, fire hazards, hazardous materials, flooding, and other potential hazards, consistent with Government Code Section 65302(g). It will also address resiliency and risks from natural hazards in Ukiah, pursuant to SB 379. This element will also cover noise element requirements, consistent with Government Code Section 65302(f), including new existing noise contours as well as projected noise contours based on future traffic volumes projected to arise from improvements planned for in the Mobility Element.

**Project Alternatives:** The EIR will evaluate a reasonable range of project alternatives that, consistent with CEQA, meet most of the project objectives and reduce or avoid potential environmental effects, including a required No Project Alternative.

**Potential Environmental Effect Areas:** The EIR will describe the reasonably foreseeable and potentially significant adverse effects of the proposed project (both direct and indirect). The EIR also will evaluate the cumulative impacts of the project when considered in conjunction with other related past, present, and reasonably foreseeable future projects. The City preliminarily anticipates that the proposed project could result in potentially significant environmental impacts in the following topic areas, which will be further evaluated in the EIR.

- |                                      |                                       |
|--------------------------------------|---------------------------------------|
| ▪ Aesthetics                         | ▪ Population and Housing              |
| ▪ Agriculture and Forestry Resources | ▪ Public Services and Recreation      |
| ▪ Air Quality                        | ▪ Transportation                      |
| ▪ Biological Resources               | ▪ Tribal Cultural Resources           |
| ▪ Cultural Resources                 | ▪ Utilities and Service Systems       |
| ▪ Greenhouse Gas Emissions           | ▪ Wildfire                            |
| ▪ Land Use and Planning              | ▪ Cumulative Effects                  |
| ▪ Noise                              | ▪ Effects Found Not to be Significant |

When the Draft EIR is completed, it will be available for review at the City's offices located at 300 Seminary Ave, Ukiah, California 95482 and online at: <https://ukiah2040.com/documents.html>. The City will issue a Notice of Availability of a Draft EIR at that time to inform the public and interested agencies, groups, and individuals of how to access the Draft EIR and provide comments.

If you have questions regarding this NOP or the scoping meeting, please contact Craig Schlatter at (707) 463-6219 or via email at [cschlatter@cityofukiah.com](mailto:cschlatter@cityofukiah.com)



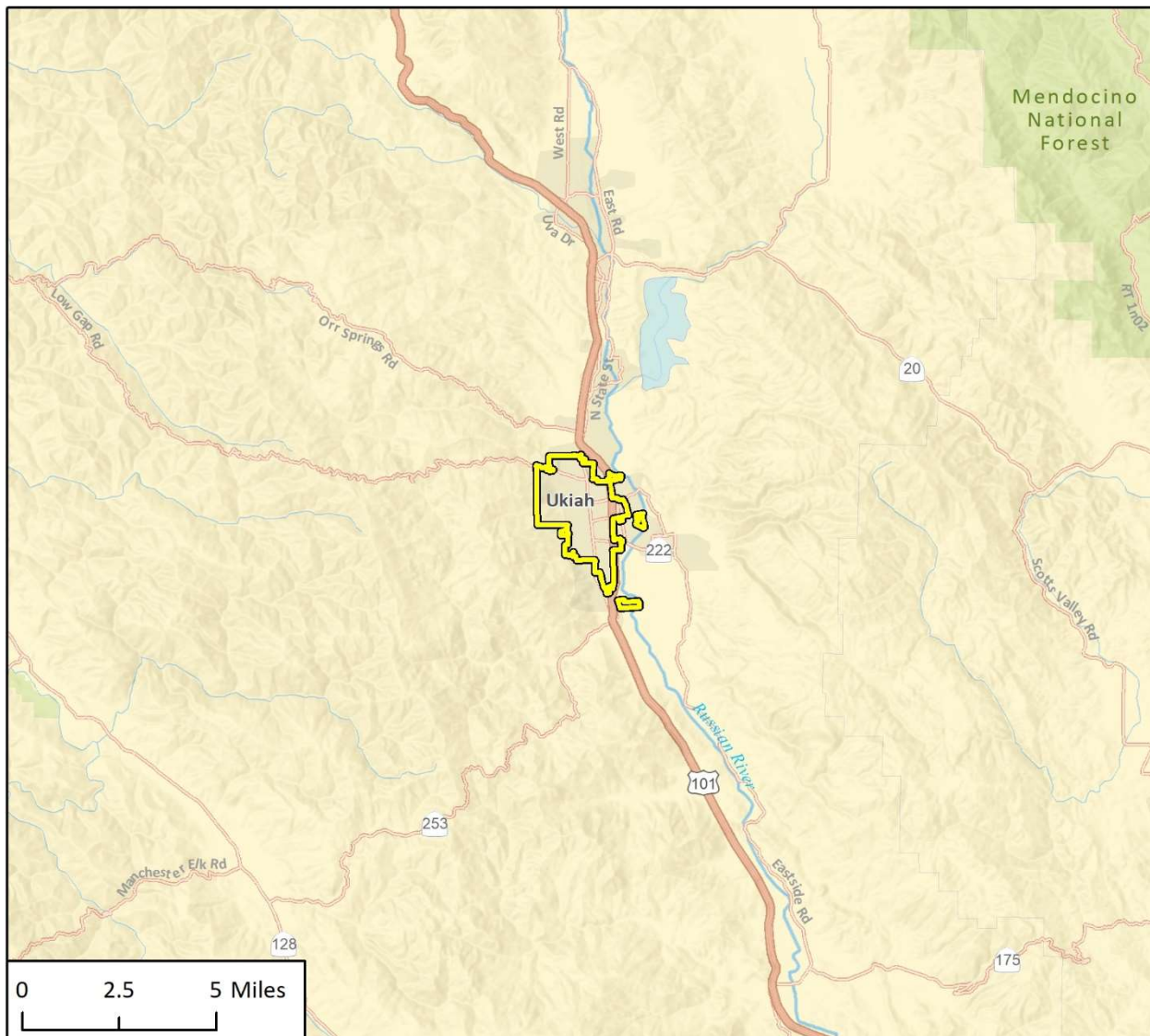
Craig Schlatter, Director of Community Development

05/31/2022


Date



**Figure 1 Regional Location**



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 City of Ukiah

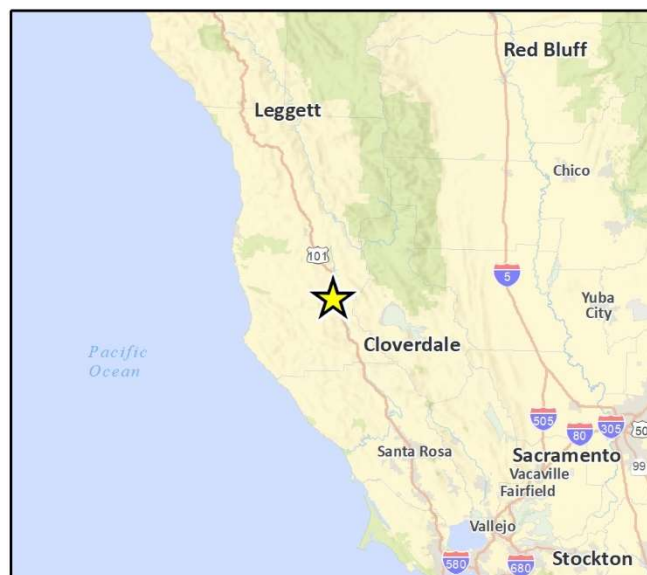
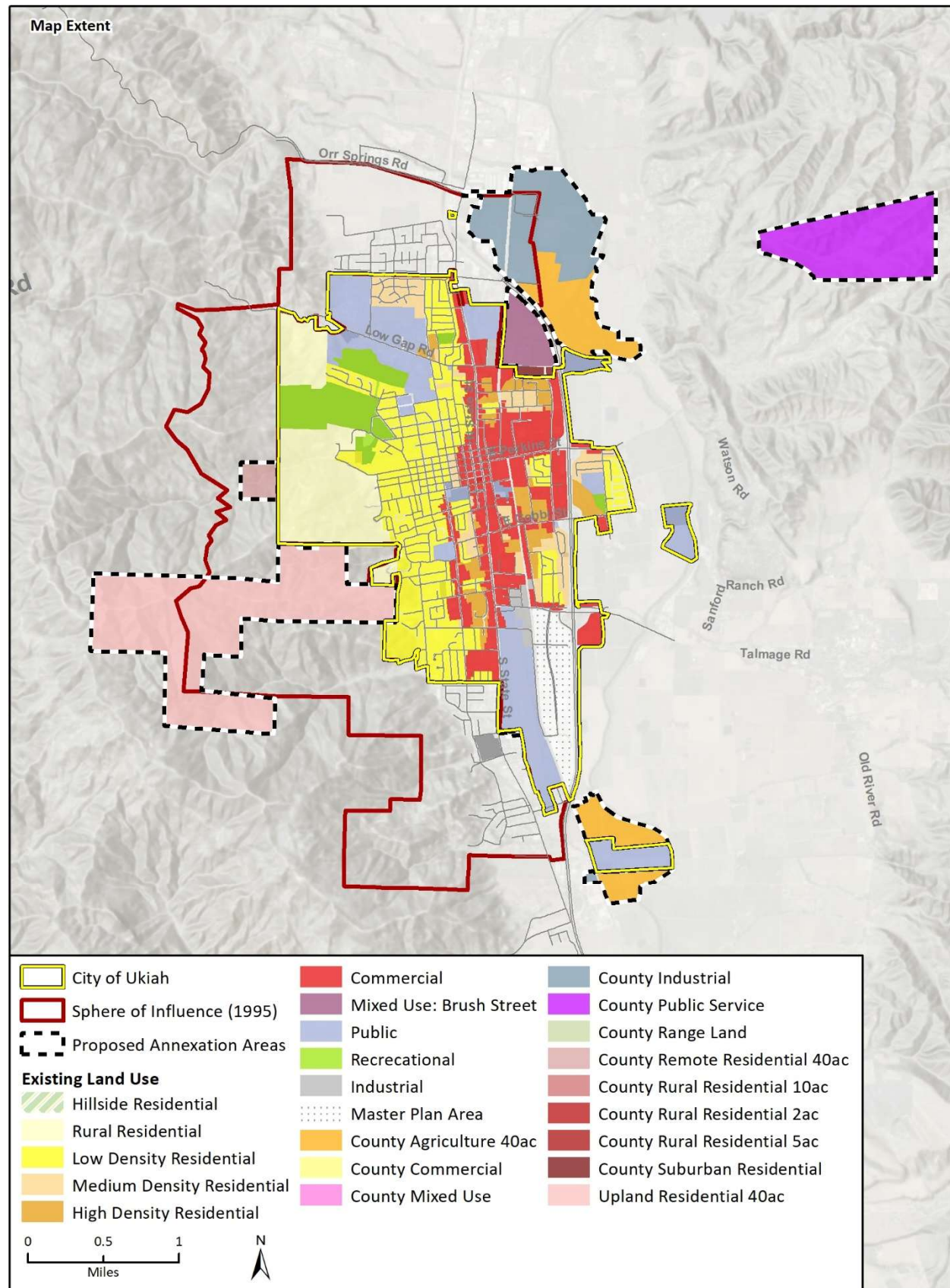


Fig 1 Regional Location

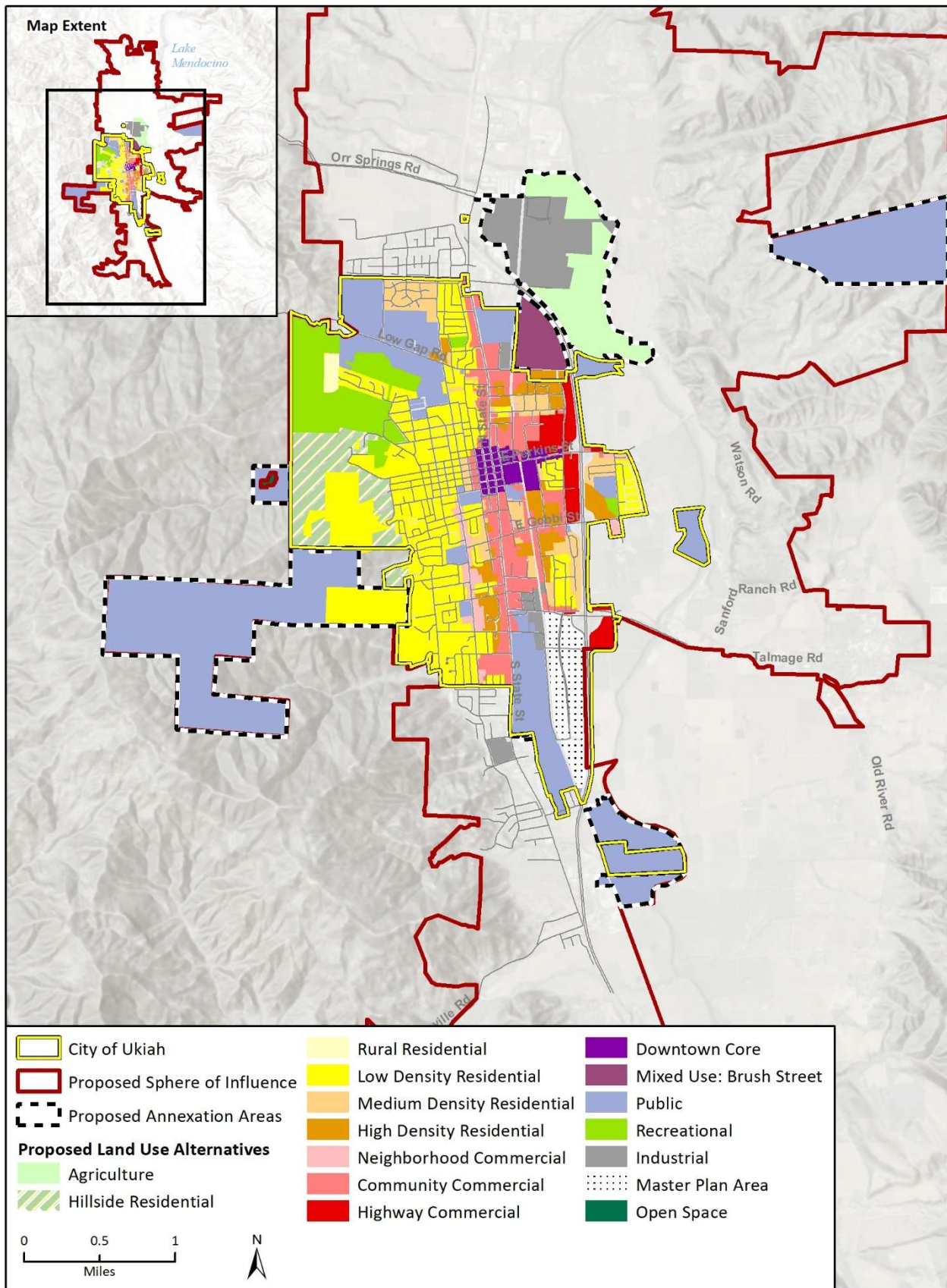
**Figure 2 Project Location and Current Land Use Designations**



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Additional data provided by City of Ukiah, 2022.



**Figure 3 Proposed Land Use Element Amendments**



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Additional data provided by City of Ukiah, 2022.

Fig X Proposed LU Alternatives

## California Department of Transportation

DISTRICT 1  
P.O. BOX 3700 | EUREKA, CA 95502-3700  
(707) 445-6600 | FAX (707) 441-6314 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



June 23, 2022

Ukiah Citywide  
General Plan Update 2040  
SCH# 2022050556

Ms. Michelle Irace  
Department of Community Development  
City of Ukiah  
300 Seminary Avenue  
Ukiah, CA 95482

Dear Ms. Irace:

Thank you for giving Caltrans the opportunity to review and comment on the Notice of Preparation for the Ukiah General Plan Update Environmental Impact Report. The planning horizon is approximately twenty years, during which time City decision makers will rely on the General Plan as the basis for making decisions on matters such as land use, transportation, open space and conservation, provision of public services, and environmental quality and safety. The following comments suggest strategies and policy considerations that are both consistent with goals and objectives of the State and designed to create a more livable and sustainable city for Ukiah residents:

### **Vehicle Miles Traveled (VMT) Reduction**

The Caltrans Strategic Plan for 2020-2024 calls for the Department to enhance and connect the multimodal transportation network and to lead in Climate Action. Caltrans has a responsibility to help meet the State's climate goals. One of the ways in which Caltrans can help California reduce and achieve a carbon-neutral future by the year 2045 is through finding ways to reduce the amount of Vehicle Miles Traveled (VMT) on California streets and highways. To meet the State's targets to reduce greenhouse gas (GHG) emissions and energy consumption, we must work with our local partners to plan for a more sustainable transportation system.

Emissions from the transportation sector make up the largest contribution of GHG emissions in the State. According to California Air Pollution Control Officers Association (CAPCOA), five of the ten most effective and efficient greenhouse gas reduction strategies have to do with the transportation system and are within the control of local governments. The following strategies are recommended as initial points of focus for future local government General Plan policies and Climate Action Plan development and include:

- 1) Promotion of smart growth, jobs/housing balance, transit-oriented development, and infill development through land use designations, zoning, and public-private partnerships.

- 2) Support for and funding of transit, bicycle, and pedestrian connections through transit and trail planning and regional cooperation.
- 4) Promotion of green procurement and alternative fuel vehicle use through municipal mandates and voluntary bid incentives.
- 5) Support for alternative fuel facilities and infrastructure through land use designations, zoning, and public-private partnerships.
- 10) Regional cooperation to find cross-regional efficiencies in GHG reduction investments and to plan for regional transit, energy generation, and waste recovery facilities.

Neighborhoods with compact housing have been shown to result in lower VMT per household when compared to areas with less dense housing. Similarly, affordable housing produces less VMT when compared to market-rate housing. To the extent that future projects contribute to the local supply of affordable and/or compact housing, new residential developments could contribute towards VMT reduction goals and standards and avoid costly mitigation measures in comparison to business-as-usual housing. Once a land use has been established or built, its ability to be adapted to address climate goals becomes far more limited.

#### Factors Influencing VMT:

- Density of housing relative to typical or existing
- Affordability of new housing
- The level of contribution committed by project mitigation
- Location of the housing project

#### Ways to measure VMT Reduction:

CAPCOA's "Quantifying Greenhouse Gas Mitigation Measures" publication has analyzed the effects of various mitigation measures on GHG emissions. While CAPCOA notes that the measures quantified are project-level in nature, many of the measures are good examples of the kinds of policies, guidelines, and actions that could be promoted in a General Plan or a Climate Action Plan.

For housing projects that result in higher densities, CAPCOA estimates a -0.22 reduction in household VMT for every percentage increase in density. To qualify as a VMT reducer, density must be higher than typical densities. CAPCOA sets the starting point at 9.1 dwelling units per acre. New developments with a density less than 9.1 dwelling units per acre would not be able to claim a reduction in VMT. CAPCOA gives an upper limit on density for VMT reduction benefits, which is 21.5 units/acre. At the upper limit for residential density, the VMT reduction benefits would begin to taper off at a 30 percent reduction in household VMT.

For the purposes of reducing transportation-related GHG emissions and reducing VMT that result from less-efficient land uses, we recommend establishing a Citywide residential density in the range of 9.1 to 21.5 dwelling units per acre.

### **Mixed Use/Employment Densities**

To maximize the potential benefits of higher density residential developments for VMT reduction goals, trip lengths can also be shortened by establishing a greater mix of land uses. Locating higher density housing in close proximity to commercial uses where goods, services and employment are abundant can help to further reduce trip length and the amount of energy consumed for transportation. CAPCOA sets 145 jobs/acre as a floor for realizing VMT benefits, which can amount to a maximum VMT reduction of 30 percent. This method must be applied to typical commute VMT for the development, a number determined through the regional travel demand model or other sources of local travel data. If typical commute VMT is not available, it could be calculated by referring to the Institute of Transportation Engineers' (ITE) Trip Generation Manual and multiply the trips by trip lengths from a big-data tool.

### **Travel Demand Management (TDM)**

Travel demand management can complement transportation infrastructure by influencing the travel mode that people choose when traveling to work, school, the grocery store, etc. Travel modes that help to reduce VMT include transit, ridesharing, walking, biking, and telework. TDM programs can help make the most of our transportation and physical infrastructure so that options to driving are naturally encouraged and our systems are better balanced. TDM measures that may help to reduce VMT include transit and micro-mobility (i.e., bike share and electric scooters) pass discounts, carpool matching services and incentives, parking pricing, bike facilities at workplaces, vanpools, guaranteed-ride-home service for employees that do not drive, education, and information on travel options other than the single-occupancy-vehicle (SOV). "Modernizing Mitigation" (2018) from the State Smart Transportation Initiative, describes VMT-focused TDM in more detail: <<https://ssti.us/modernizing-mitigation/>>.

#### Factors to consider:

Senate Bill (SB) 743-relevant TDM measures should be designed to replace car trips with other modes or by increasing vehicle occupancy in existing motor vehicle trips (e.g., carpooling). TDM should be considered supplemental to employment and residential densities that reduce distances traveled.

We encourage the City to coordinate with the Mendocino Council of Governments (MCOG), the Regional Transportation Planning Agency for Mendocino County, to plan, program, and implement TDM measures that are suitable for the Ukiah and Ukiah Valley context. Other collaborators could include local governments, employers, college and school campuses, transit systems (e.g. with free or discounted transit passes), and residential landlords (e.g. with priced parking).

### **Public Transportation/Mass Transit**

The transportation element will benefit from a clear definition of sustainability in the context of local transit service and conditions. The Federal Transit Administration (FTA) defines sustainable transit as enhancing the quality of life, meeting ambient air quality standards, reducing the need for more road construction, lower contribution to stormwater run-off, reducing fuel use and providing critical services for all members of society. Ultimately, sustainable transportation means designing public transit services that are attractive to the people who want to use them.

Useful links: <<https://www.transit.dot.gov/regulations-and-programs/environmental-programs/transit-and-sustainability>>,  
<<https://www.kittelson.com/ideas/3-ways-to-improve-public-transportation-sustainability/>>,  
<<https://www.transportation.gov/mission/health/Expand-Public-Transportation-Systems-and-Offer-Incentives>>,  
<<https://www.nytimes.com/2015/05/07/upshot/transportation-emerges-as-crucial-to-escaping-poverty.html>>.

To promote and prioritize high quality transit that aligns with the City of Ukiah's land use, housing, and economic development policies, we suggest that the City General Plan Update include the following:

- Consider zoning changes to increase density around existing transit corridors.
- Establish an inventory of transit supportive infrastructure/assets on the State Highway System.
  - Coordinate transit stops, transit centers and routes with bicycle and pedestrian infrastructure to create first and last mile connections.
  - Locations may include conventional highways and freeway interchange transit stops, connections to intermodal transit stations, mobility hubs, park and ride lots, regional and interregional transfer points,
- Assemble a toolbox of best practices, common standards, and types of infrastructure to consider on projects for the State Highway System. Consider a Complete Streets Elements Toolbox.
  - Potentially to include transit accessibility improvements, bus boarding islands with bikeways, highway crossing needs at transit stops, queue jump lanes, transit signal prioritization, bus shelters and other bus stop infrastructure improvements.
- A prioritization methodology for transit supportive infrastructure improvements at specific locations with potential funding opportunities.
- Integration with Statewide and Regional documents and plans, including the California Intercity Bus Study, Caltrans Race and Equity Action Plan...
  - Involve transit providers early in General Plan processes to ensure their alignment with community priorities.
  - Incorporate California planning priorities such as VMT reduction, GHG reduction, active transportation, equity and complete streets goals in City transportation and



transit planning. This is accomplished by offering residents viable non-automobile travel choices (bike, ped and transit).

- Recommendations for transit performance objectives for City, regional, and interregional service.
- Aim to increase transit ridership by involving developer/residential and employer programs through general plan visions and goals that incentivize and reward public transit usage. This could be in the form of reduced rent, subsidies, reimbursements, or pre-tax payroll reductions.

#### Ways to measure impacts:

Determining the VMT effect from increased transit service can be done with two calculations:

- Ridership. Where service was established through applications for New Starts, Small Starts or state capital funding, the original ridership estimates may already be available in the form of passenger-miles-traveled. If none of these applications are available, the transit provider would need to help make an estimate.
- VMT. Converting transit ridership into VMT is thoroughly discussed in "An Update on Public Transportation's Impacts on Greenhouse Gas Emissions" (TCRP, 2021): <https://nap.nationalacademies.org/catalog/26103/an-update-on-public-transportations-impacts-on-greenhouse-gas-emissions>.

High quality public transportation can make communities more equitable by increasing access to critical destinations such as employment, healthcare, and vital social services for low-income individuals and communities.

#### **Local road networks/connectivity**

Though highways were originally conceived as intercity or rural-serving facilities, today, in most places, they facilitate mostly local and intraregional travel. The large volume of short-distance traffic is both a problem – it undercuts highways' original purpose, for example by delaying intercity or farm-to-market freight in traffic – and an opportunity. In many cases local travelers use the State Highway System (SHS) for short trips because local networks are incomplete or disconnected. Creating better-connected, multimodal networks off the SHS offers options for travelers to make more direct trips, sometimes by non-auto modes, reducing not only VMT but pressures to add expensive highway capacity. The planning literature cites "intersection density" as a measure of connectivity, and one that contributes to lower VMT. An assessment of and focus on local road networks could improve local, multi-modal circulation and reduce the need for new, high-cost highway capacity improvements and mitigation.

#### Factors to consider:

- Origins and destinations of travelers in a corridor or on a facility.
- Gaps and other identified needs in the local modal networks.

#### Ways to measure impacts:

- Local circulation needs and gaps can be demonstrated through the use of big data, to examine origins and destinations of travelers, and circuitry of routing. Where travelers are diverting significantly from direct routes, or where they are nearly all driving despite origins and destination that are close by, improvements in the auto and active transportation networks are worth considering.
- Accessibility tools can measure gaps in the multimodal systems as well, comparing existing accessibility to ideal accessibility where origins and destinations are linked directly.
- Local network improvements could help to reduce the need for capacity increasing improvements on the SHS and are more likely to be screened out of an analysis for induced VMT.

### **Traffic Operations and Transportation Safety**

Caltrans has a vision to eliminate fatalities and serious injuries on California's roadways by 2050 and provide safer outcomes for all communities. We encourage the City to help realize this vision by committing to the following:

- Adopt a safety-first mindset that prioritizes road safety.
- Prioritize the elimination of fatal and serious injury crashes through existing safety improvement programs along with development and implementation of new programs to enhance the safe use of our roadways.
- Eliminating race-, age-, ability- and mode-based disparities in road safety outcomes.

We recommend that the City include a discussion about traffic safety and traffic safety goals in the Transportation and Circulation Element of the General Plan/Project. If the City is not already actively engaged in monitoring progress toward zero deaths, we recommend including an examination of Actual Collision Rates to Average Collision Rates where data is available to help establish priorities for addressing safety.

We encourage the City to include a section in the Transportation and Circulation Element that identifies any future planned, programmed, or potential projects that may benefit traffic safety or related traffic operation improvements.

We request to view the projected increase in population over the time frame of the plan update, and we request to review the City's traffic volume projections at buildout.

We suggest including a section in the Transportation and Circulation Element that examines signal warrants for any locations expected to be impacted with a significant increase in travel demand. The need for any capital projects, including new intersection traffic control measures, are likely of interest to the Region and the State especially when discretionary funding will be pursued.

### **Parking Management**

Parking management is considered to have a significant influence on Vehicle Miles Traveled. Parking management may be most effective when integrated with multifamily

residential or employment land uses, in the form of parking permits, fees or capacity limitations. When coupled with higher density housing or employment, it may be possible to achieve VMT benefits from parking management outside of specific land uses, though trying to quantify the benefits or results can get complicated.

Factors to consider:

- Standard parking-demand rates (assuming unlimited free parking).
- Type and degree of parking management (extent of capacity limitation, amount of fees).

Ways to measure impacts:

- CAPCOA promotes the use of the "ITE Parking Generation Manual" to reduce VMT by as much as 13.7 percent for limiting free parking for residential land uses if abundant free parking is not otherwise available in the vicinity.
- The use of parking fees or charges at residential land uses can help to reduce VMT by as much as 15.7 percent.

CAPCOA's "Quantifying Greenhouse Gas Mitigation Measures" and "Model Policies for Greenhouse Gases in General Plans" can be found online:  
<<http://www.capcoa.org/documents/>>.

State Route 222

We note that the proposed sphere of influence has been reduced from the boundaries considered during the Ukiah Valley Area Plan (UVAP) planning process. The City's sphere of influence continues to include Talmage Road/State Route 222. Should the City consider annexing lands adjacent to SR 222, we would welcome and facilitate relinquishing the entire Route, or portions of it, to the City. Feel free to contact me, should the City wish to pursue relinquishment of SR 222.

We welcome the opportunity to partner with Ukiah to plan and to build a safe, efficient, and sustainable transportation system for city residents. Please contact me with questions or for further assistance at: (707) 684-6879 or by email at: <[jesse.robertson@dot.ca.gov](mailto:jesse.robertson@dot.ca.gov)>.

Sincerely,

*Jesse G. Robertson*

Jesse Robertson  
Transportation Planning  
Caltrans District 1

c: State Clearinghouse  
Nephele Barrett, Director, Mendocino Council of Governments  
Jacob King, Executive Director, Mendocino Transit Authority



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D., Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

June 30, 2022

Mr. Craig Schlatter  
Director of Community Development  
City of Ukiah Community Development Department  
300 Seminary Avenue  
Ukiah, California 95482  
[CSchlatter@cityofukiah.com](mailto:CSchlatter@cityofukiah.com)

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
THE CITY OF UKIAH GENERAL PLAN UPDATE – DATED MAY 2022  
(STATE CLEARINGHOUSE NUMBER: 2022050556)

Dear Mr. Schlatter:

The Department of Toxic Substances Control (DTSC) received a Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the City of Ukiah General Plan Update (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, work in close proximity to mining or suspected mining or former mining activities, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

DTSC recommends that the Hazards and Hazardous Materials section of the DEIR address actions to be taken for any sites impacted by hazardous waste or hazardous materials within the Project area, not just those found on the Cortese List. Not all sites impacted by hazardous waste or hazardous materials will be found on the Cortese List. DTSC recommends consulting with other agencies that may provide oversight to hazardous waste facilities and sites in order to determine a comprehensive listing of all sites impacted by hazardous waste or hazardous materials within the Project area. DTSC hazardous waste facilities and sites with known or suspected contamination issues can be found on DTSC's [EnviroStor](#) data management system. The [EnviroStor Map](#) feature can be used to locate hazardous waste facilities and sites for a county, city,

or a specific address. A search within EnviroStor indicates that numerous hazardous waste facilities and sites are present within the Project's region.

DTSC recommends that the following issues be evaluated in the Hazards and Hazardous Materials section of the DEIR:

1. The DEIR should acknowledge the potential for historic or future activities on or near the Project site to result in the release of hazardous wastes/substances on the Project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The DEIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.
2. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerally deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil, DTSC recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the Project described in the DEIR.
3. If any sites within the Project area or sites located within the vicinity of the Project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the DEIR. DTSC recommends that any Project sites with current and/or former mining operations onsite or in the Project site area should be evaluated for mine waste according to DTSC's 1998 [Abandoned Mine Land Mines Preliminary Assessment Handbook](#).
4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006

[Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers.](#)

5. If any projects initiated as part of the proposed Project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to [DTSC's 2001 Information Advisory Clean Imported Fill Material.](#)
6. If any sites included as part of the proposed Project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the DEIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 [Interim Guidance for Sampling Agricultural Properties \(Third Revision\).](#)

DTSC appreciates the opportunity to comment on the DEIR. Should you need any assistance with an environmental investigation, please visit DTSC's [Site Mitigation and Restoration Program](#) page to apply for lead agency oversight. Additional information regarding voluntary agreements with DTSC can be found at [DTSC's Brownfield website.](#)

If you have any questions, please contact me at (916) 255-3582 or via email at [Brian.McAloon@dtsc.ca.gov](mailto:Brian.McAloon@dtsc.ca.gov).

Sincerely,



Brian McAloon  
Project Manager  
Site Evaluation and Remediation Unit  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning  
and Research  
State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Mr. Dave Kereazis  
Office of Planning & Environmental Analysis  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)



# MENDOCINO

## Local Agency Formation Commission

Ukiah Valley Conference Center | 200 South School Street | Ukiah, California 95482  
Telephone: (707) 463-4470 | E-mail: [eo@mendolafco.org](mailto:eo@mendolafco.org) | Web: [www.mendolafco.org](http://www.mendolafco.org)

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June 28, 2022

VIA EMAIL

Craig Schlatter, Director of Community Development  
City of Ukiah Community Development Department  
300 Seminary Avenue  
Ukiah, California 95482  
[cschlatter@cityofukiah.com](mailto:cschlatter@cityofukiah.com)

RE: LAFCo Comments – Notice of Preparation of a Draft Environmental Impact Report for the City of Ukiah  
2040 General Plan Update

Dear Mr. Schlatter,

Mendocino LAFCo appreciates the opportunity to comment on a Notice of Preparation (NOP) dated May 31, 2022, for the Draft Environmental Impact Report (EIR) for the City of Ukiah 2040 General Plan Update. Mendocino LAFCo will use both final documents in fulfilling its regulatory and planning responsibilities under the authority of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (CKH). These duties include, but are not limited to, adopting spheres of influence, regulating governmental boundary changes through annexations or detachments, and forming, consolidating, or dissolving special districts. Under the California Environmental Quality Act (CEQA), LAFCo is a Responsible Agency for this project and it is in this role that Mendocino LAFCo is commenting on this NOP.

### **Sphere of Influence**

Typically, an update of a city's sphere of influence (SOI) is processed following or concurrent with its general plan update, either through LAFCo initiation or by city application. An SOI is defined as "a plan for the probable physical boundaries and service area of a local agency, as determined by the Commission" (Government Code (GC) Section 56076). More detailed requirements for what to include in a SOI review or update are contained in GC Section 56425(e), which essentially includes: identification of existing and planned land uses including agricultural land, the need for public facilities and services in the area and an evaluation of the present capacity and adequacy of these services (such as sewer and water supply), the existence of any social or economic communities of interest (which could include existing service providers or special needs communities), and the presence of any disadvantaged unincorporated communities within the sphere.

In order for annexations to be considered by the Commission the area must be within an agency's SOI. Additionally, any need for extensions of service outside an agency's boundary absent an annexation must also be within an agency's SOI to be considered by the Commission (GC 56133), the exception being a documented health and safety condition (GC 56133(e)).

The City of Ukiah's SOI has not been updated since the initial sphere establishment that was part of a County-wide adoption of spheres for all agencies as recommended in LAFCo's 1984 Zion Study. A municipal service review (MSR) for the City was prepared and adopted by the Commission in 2012; however, a subsequent application by the City to update the SOI was not completed.

The City is currently assisting LAFCo with a comprehensive update of the 2012 MSR and a concurrent update to the SOI. The updates are tracking with the City's General Plan Update and it is strongly recommended that the proposed SOI be analyzed in the Draft EIR for comprehensive planning and analysis, and for efficiency of costs, effort and time.

Please note that the NOP includes two figures identifying differing proposed SOI boundaries (Figures 2 and 3). Figure 2 of the NOP identifies an SOI that was proposed by the City in 1995; however, it was never processed through LAFCo or adopted by the Commission and is therefore not a valid SOI. It is assumed that Figure 3 portrays the SOI boundary as currently proposed by the City; however, this map differs from the proposed SOI map provided to LAFCo for the MSR/SOI Update.

- 1. LAFCo is currently coordinating with the City to prepare an MSR and an update of its SOI. Sphere of Influence updates are subject to CEQA and should be included in the General Plan update process and evaluated in the Draft EIR.**
- 2. The Figure 2 legend label should be clarified: "Proposed Sphere of Influence (1995)."**
- 3. Clarify which SOI is being proposed and analyzed in the Draft EIR (i.e., Figure 2 or 3).**
- 4. The EIR Study Area should include all areas proposed for inclusion in the SOI for purposes of analysis, identification of potential impacts and mitigation measures.**

#### **City-County Consultation**

A procedural step in the processing of an SOI update by LAFCo is compliance with Government Code Section 56425(b). In summary, the GC requires that prior to a city submitting an application to LAFCo to update their SOI, representatives from the city shall meet with the county to discuss the new sphere boundaries, and methods to reach agreement on development standards within the sphere that reflect the concerns of the affected city and that promotes logical and orderly development. If an agreement is reached, LAFCo "...shall give great weight to the agreement to the extent that it is consistent with the commission policies in its final determination of the city sphere."

In this case the SOI update is being prepared as a LAFCo-initiated process concurrent with the General Plan update and with the intent that the SOI update be included in the Draft EIR project description and analysis. However, LAFCo strongly recommends coordination with the County regarding the proposed sphere, particularly as County staff have expressed their intent to implement the Ukiah Valley Area Plan (UVAP), which applies to the area around the City and within the proposed SOI.

In addition to the County, a number of single-service special districts exist and provide services immediately surrounding and overlapping portions of the City of Ukiah. The SOI indicates the future growth boundary of the City and as the City grows it will encroach on territories of the surrounding special districts. Additionally, in reviewing applications for annexations, LAFCo must consider the financial and operational impacts on adjacent service providers and whether the change of organization will impact those agencies' ability to adequately provide services to their remaining customers.

Ultimately, it is LAFCo's role to decide the best provider of services to an area through its consideration of agency SOIs and associated applications for annexation, detachment, activation of powers, etc. It is preferable that planning for the future provision of services be made amongst the service providers themselves and efforts between City and special district staff are focusing on development of agreements regarding the growth of the City, which will ultimately be highly beneficial to all the agencies and affected customers.

5. **Identify and describe the other service providers within the proposed SOI area, including special districts and private water companies (i.e., Mendocino County, Ukiah Valley Sanitation District, Millview County Water District, Willow County Water District, Calpella County Water District, Rogina Water Company, etc.).**
6. **To support the City's annexation plans and SOI update, LAFCo encourages agreements among jurisdictions that outline conditions for expanding boundaries (i.e., Mendocino County, Ukiah Valley Sanitation District, Millview County Water District, Willow County Water District, Calpella County Water District, etc.). Agreements can be recognized by LAFCo.**

### **Agricultural and Open Space Lands**

The NOP identifies agriculture and forestry resources as a topic area for evaluation of potentially significant environmental impacts and indicates the General Plan will include an Agriculture Element.

Preserving prime agricultural land is a key statutory mandate of LAFCo and inclusion of an Agriculture Element is encouraging. Measuring and understanding the importance of California's remaining prime agricultural land can be a challenge because federal, state, and local agencies, including LAFCos, all operate under different laws and requirements, each setting out different definitions of prime farmland.

The definition of agricultural lands and prime agricultural lands differ somewhat from the Department of Conservation definitions that are typically relied upon for CEQA analysis. Land that would not qualify as Prime under USDA or FMMP definitions of Prime, may qualify as Prime under the LAFCo definition; for example, Unique Farmland, and Farmland of Statewide Importance, and grazing land can still meet the LAFCo definition of prime agricultural land.

CALAFCO's White Paper [State of the Art on Agricultural Preservation](#) includes discussion of the differences in definitions of prime agricultural land and potential mitigation measures for agricultural preservation as it relates to LAFCo's guiding principles and goals specified in the CKH.

Preserving prime agricultural lands and open space is a key statutory mandate of LAFCos and the CKH Act provides direction to LAFCos on certain policies, priorities, and information that LAFCos should, and/or must consider when analyzing boundary change proposals that could potentially impact agricultural lands. The CKH Act includes policies specific to agricultural preservation, including:

- Development or use of land for other than open-space uses shall be guided away from existing prime agricultural lands in open-space use toward areas containing non-prime agricultural lands, unless the action would not promote the planned, orderly, efficient development of an area. (Gov. Code §56377(a).)
- Development of existing vacant or nonprime agricultural lands for urban uses within the existing jurisdiction of a local agency or within the sphere of influence of a local agency should be encouraged before any proposal is approved which would allow for or lead to the development of existing open-space lands for non-open-space uses which are outside of the existing jurisdiction of the local agency or outside of the existing sphere of influence of the local agency. (Gov. Code §56377(b).)
- Factors to be considered [by the Commission] in the review of a proposal shall include the effect of the proposal on maintaining the physical and economic integrity of agricultural lands, as defined by Section 56016. (Gov. Code § 56668(e).)

Further, to equip individual LAFCos with the ability to respond to local conditions and circumstances, the CKH Act calls for a LAFCo to establish written policies and procedures and exercise its powers to "encourage and provide planned, well-ordered, efficient urban development patterns with appropriate consideration of

preserving open-space and agricultural lands within those patterns” (Gov. Code §56300(a)). [Mendocino LAFCo Policy 9.13](#) contains the local policies applied by the Commission.

Large areas within the proposed SOI (Figure 3) are currently designated and used for agricultural purposes. Government Code Section 56425(e)(1), requires identification of agricultural and open space lands. Further, Government Code Section 56426.69 encourages the exclusion of lands under Williamson Act from a SOI and specifies the conditions upon which Williamson Act lands may be included.

Additionally, in reviewing and approving or disapproving proposals which could reasonably be expected to induce, facilitate, or lead to the conversion of existing open-space lands to uses other than open-space uses, the commission shall consider all of the policies and priorities identified in GC 56377, which should also be applied to the SOI.

7. Include discussion and analysis of impacts to agricultural lands as defined in GC 56016 and 56064.
8. Identify, map, analyze, and describe all agricultural and open space lands within or adjacent to lands proposed for inclusion in the SOI, including analysis of any multiple land-based values such as agricultural, biodiversity, recreation, groundwater, and carbon sequestration, to identify areas of high natural resource value where development is best avoided.
9. Identify and analyze impacts to Williamson Act lands proposed for inclusion in the SOI.
10. Analyze the impact on the physical and economic integrity of impacted and surrounding agricultural lands.
11. Consider removal of excessive amounts of agricultural and open-space land from the SOI (i.e., where SOI is much larger than what is needed over a long-range development horizon).
12. Develop policies that avoid, minimize and/or mitigate impacts to agricultural lands. See the CALAFCO White Paper [State of the Art on Agricultural Preservation](#) and the Mendocino County [Sustainable Agricultural Lands Conservation Program](#) for information on policies and programs for example avoidance, minimization and mitigation methods.
13. Include long-term growth management strategies that provide for more efficient development so as to avoid the premature conversion of agricultural lands and to limit development pressure on agricultural lands.
14. The City is encouraged to include plans and policies for agricultural preservation in its Agriculture Element.
15. Identify mitigation measures to protect agricultural lands adjoining areas proposed for annexation and/or development, both to prevent premature conversion to non-agricultural uses and to minimize potential conflicts between proposed urban development and adjacent agricultural uses. Examples of feasible mitigation measures include: right-to-farm deed restrictions, setbacks and buffers, and conservation easements on a 1:1, 2:1 or 3:1 ratio.
16. Includes analysis of alternatives that do not result in conversion of agricultural lands as defined in the CKH. Examples of potential project alternatives to reduce impacts to agricultural lands include, among others: reduced footprint, clustered density, setbacks and buffers.
17. The Draft EIR should demonstrate that infill or more efficient use of land is not possible prior to considering development, SOI expansion and/or annexation into agricultural lands.

#### **Public Facilities, Services, and Infrastructure**

LAFCo is concerned with the potential impact of planned growth on public services and infrastructure, including the topic areas of hydrology and water quality, public services, parks and recreation, utilities and service systems. Typically, master plans are prepared for sewer, water and stormwater utilities, and the EIR should evaluate the need for increased police, fire, parks and recreation staff, and services resulting from the growth contemplated in the General Plan.

- 18. The Draft EIR should evaluate the need for increased police, fire, parks and recreation staff, and services resulting from the growth contemplated in the General Plan.**

**Disadvantaged Unincorporated Communities**

For an update of a SOI of a city that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities (DUCs) within the SOI (GC 56425(e)(5)). DUCs are defined in GC 56033.5.

- 19. Identify, locate and describe all disadvantaged unincorporated communities (DUCs) within and contiguous to the proposed SOI (GC 56430(a)(2 and 3)).**

**Prezoning within Proposed SOI**

In reviewing proposals for annexation, the CKH requires the commission to include a condition that a city prezone the territory to be annexed or present evidence satisfactory to the commission that the existing development entitlements on the territory are vested or are already at build-out, and are consistent with the city's general plan (GC 56375(a)(4)(A)(7)). Areas proposed for annexation must be located within an agency's SOI.

- 20. The City should consider prezoning the area within the proposed SOI to streamline future annexations submitted for commission consideration. In doing so at the General Plan stage, the prezoning may be analyzed in the Draft EIR.**

**General CEQA Considerations**

LAFCo is in the process of updating the City's Sphere of Influence (SOI), which is a project subject to CEQA. Including the SOI Update analysis in the City's General Plan Draft EIR will be essential so as to avoid piecemealing as well as additional expense associated with a preparation of a separate CEQA document. With the SOI Update included in the General Plan Draft EIR, LAFCo will be a Responsible Agency for purposes of CEQA.

- 21. Clarify that LAFCO is a Responsible Agency as it relates to the General Plan EIR and indicate the types of LAFCo approvals that the City anticipates seeking. We also suggest that a section be included in the Draft EIR briefly identifying all Responsible Agencies for the Program EIR and providing brief information on the types of approvals or permits that the City anticipates seeking from the identified agencies.**
- 22. Clarify whether the City anticipates tiering from the Program EIR for potential projects that require LAFCo approval.**
- 23. CKH, California Government Code, Section 56377: In reviewing and approving or disapproving proposals which could reasonably be expected to induce, facilitate, or lead to the conversion of existing open-space lands to uses other than open-space uses, the commission shall consider...(a) Development or use of land for other than open-space uses shall be guided away from existing prime agricultural lands in open-space use toward areas containing nonprime agricultural lands, unless that action would not promote the planned, orderly, efficient development of an area.**
- 24. CEQA Guidelines, Title 14, California Code Regulations, Section 15041: The responsible agency may require changes in a project to lessen or avoid only the effects, either direct or indirect, of that part of the project which the agency will be called on to carry out or approve.**
- 25. CEQA Guidelines, Title 14, California Code Regulations, Section 15096(g)(2): When an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would**

June 28, 2022

**substantially lessen or avoid any significant effect the project would have on the environment. With respect to a project which includes housing development, the Responsible Agency shall not reduce the proposed number of housing units as a mitigation measure if it determines that there is another feasible specific mitigation measure available that will provide a comparable level of mitigation.**

Lastly, please notify us when the City's Draft General Plan and associated Draft EIR become available for public review. We look forward to reviewing both documents and providing comments, as necessary. If you have any questions regarding these comments, please contact Uma Hinman at (916) 813-0818 or [eo@mendolafco.org](mailto:eo@mendolafco.org).

Thank you again for providing us with the opportunity to comment on this important project.

Sincerely,



Uma Hinman  
Executive Officer

Cc: Commissioners



## NATIVE AMERICAN HERITAGE COMMISSION

RECEIVED

May 27, 2022

JUN 02 2022

CHAIRPERSON  
**Laura Miranda**  
Luiseño

Craig Schlatter  
City of Ukiah  
300 Seminary Ave  
Ukiah, CA 95482

CITY OF UKIAH  
COMMUNITY DEVELOPMENT

Re: 2022050556, City of Ukiah General Plan Update Project, Mendocino County

VICE CHAIRPERSON  
**Reginald Pagaling**  
Chumash

Dear Mr. Schlatter:

PARLIAMENTARIAN  
**Russell Attebery**  
Karuk

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

SECRETARY  
**Sara Dutschke**  
Miwok

COMMISSIONER  
**William Mungary**  
Paiute/White Mountain  
Apache

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

COMMISSIONER  
**Isaac Bojorquez**  
Ohlone-Costanoan

COMMISSIONER  
**Buffy McQuillen**  
Yokayo Pomo, Yuki,  
Nomlaki

COMMISSIONER  
**Wayne Nelson**  
Luiseño

COMMISSIONER  
**Stanley Rodriguez**  
Kumeyaay

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

EXECUTIVE SECRETARY  
**Raymond C. Hitchcock**  
Miwok/Nisenan

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

NAHC HEADQUARTERS  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

AB 52



AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

**1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:**

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

**2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:**

A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

**3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

**4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

**5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

**6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- Avoidance and preservation of the resources in place, including, but not limited to:
    - Planning and construction to avoid the resources and protect the cultural and natural context.
    - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - Protecting the cultural character and integrity of the resource.
    - Protecting the traditional use of the resource.
    - Protecting the confidentiality of the resource.
  - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([https://ohp.parks.ca.gov/?page\\_id=30331](https://ohp.parks.ca.gov/?page_id=30331)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

**3. Contact the NAHC for:**

- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
- b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

**4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.**

- a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:

[Cameron.Vela@nahc.ca.gov](mailto:Cameron.Vela@nahc.ca.gov).

Sincerely,

*Cameron Vela*

Cameron Vela  
Cultural Resources Analyst

cc: State Clearinghouse



June 29, 2022

Mayor Brown, Council Members and Staff,

NorCal 4 Health is most appreciative to be part of the EIR Scoping process. We would like to offer a few areas of opportunity to consider during the EIR phase that may potentially help elevate the health and economic success of Ukiah residents and businesses, which we know will contribute to the guiding principles of Ukiah 2040 GP, (specifically, that it maintains and supports quality of life, community satisfaction, and safety for all residents).

Tobacco and emerging nicotine products create numerous health challenges and economic burdens for communities, particularly for smaller, under-resourced communities. How and where these products are procured and disposed of, the impacts on health, addiction (especially for youth), and the cost of treating tobacco-related illnesses can be overwhelming.

Further, used cigarette butts are known to leach toxic amounts of nicotine, pesticides, polycyclic aromatic hydrocarbons, arsenic, and heavy metals such as lead and cadmium, potentially for years after use. Even unsmoked cigarette butts are toxic to animals, plants, and aquatic life. Recent research also shows that smoked butts create localized air pollution long after use.<sup>1</sup>

Then there is the impact of the emerging electronic nicotine delivery system (ENDS) products (commonly known as vapes) to consider. In 2019, the FDA proposed adding an additional 19 chemicals or chemical compounds (to the already 93 harmful and potentially harmful constituents (HPHC) in tobacco products) due to the introduction of these products. Most are carcinogenic and about 1/3 are respiratory toxicants.<sup>2</sup> Both federal and California laws list nicotine as hazardous waste under a commercial chemical waste listing.<sup>3</sup> These products can also contain electronic ignition and burning systems that include batteries. There may be added dangers if vape batteries catch fire or explode, as is known to happen, near flammable gases or liquids, such as oxygen, propane, or gasoline.

Additionally, NorCal 4 Health wholly supports mixed-use development, as it can provide housing for all and better access to daily needs. We are concerned, though, that this may create an increase of access to dangerous and unhealthy items like tobacco and other nicotine products, alcohol, and sugary drinks, as more retail opportunities in neighborhoods open up.

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<sup>1</sup> <https://www.publichealthlawcenter.org/sites/default/files/resources/Tobacco-Product-Waste-CA-FAQ.pdf>

<sup>2</sup> <https://www.fda.gov/news-events/fda-brief/fda-brief-fda-seeks-comment-proposed-additions-list-harmful-and-potentially-harmful-constituents>

<sup>3</sup> <https://www.publichealthlawcenter.org/sites/default/files/resources/Tobacco-Product-Waste-CA-FAQ.pdf>

In light of these circumstances, we offer the following for consideration for study in the EIR:

- The availability of healthy housing or green housing, including housing that prioritizes healthy indoor air quality (e.g., free of radon, toxins, secondhand, and thirdhand smoke, etc.)
- The density of retailers that sell tobacco and other nicotine products and their proximity to homes; youth-sensitive areas, like schools, parks, and community centers; and hazardous materials, such as flammable gases or liquids like oxygen, propane, or gasoline.
- The availability of healthy food vs. unhealthy food options in neighborhoods (e.g., are more retailers that sell healthy food available than retailers who primarily sell convenience food, tobacco products, and alcohol?) and identification of any healthy food deserts that need to be addressed.
- The impact of waste on community spaces, watersheds, and land, including tobacco and nicotine product waste.
- Evaluate outdoor public spaces, including outdoor worksites, dining areas, sidewalks, parks and recreation spaces, parking lots, etc., for healthy policies to support our community, including availability of healthy smoke-free spaces.

Our project can help provide resources for some of the data and further relevant information if the Council and/or staff desire.

Thank you, again, for this opportunity to participate in this valuable community process. We hope it helps our community become all it envisions.

Respectfully submitted,

JoAnn Saccato, MA  
Community Engagement Coordinator  
Lake & Mendocino  
NorCal 4 Health project  
California Health Collaborative

Phone: 707 530-5171  
[www. NorCal4Health.org](http://www.NorCal4Health.org)



CALIFORNIA HEALTH  
COLLABORATIVE





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**From:** Pinky Kushner <[pinkkushner@gmail.com](mailto:pinkkushner@gmail.com)>  
**Sent:** Wednesday, June 22, 2022 1:34 PM  
**To:** [rick@mintierharnish.com](mailto:rick@mintierharnish.com)  
**Subject:** Scoping comments for Ukiah's 2040 General Plan

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Thank you for the opportunity to submit scoping comments. The General Plan 2040 is an opportunity to help keep Ukiah beautiful, livable, and fun. I understand that the deadline for these comments is June 30, 2022.

Scoping comments:

**LIGHTS:** the City of Ukiah has historically been committed to the principles of dark skies. Along with a renewed statement of this commitment, include an analysis of current light pollution and the projected light pollution when the 20/25 year program is built out. [For further information, see: <https://www.darksky.org/light-pollution/measuring-light-pollution/>]

**NOISE:** Noise is a serious environmental concern. Provide analyses of current noise levels and projected noise levels at build-out.

**AIR QUALITY:** Provide an analysis of current air quality with a projection at build out.

**ECONOMIC BLIGHT, Parts I and 2:** While seemingly unnecessary, the economic blight analysis is critical.

**Part 1: MITIGATIONS TO AVOID A CENTER COLLAPSE.** As urban centers build out from the center, the urban center itself often collapses. Discuss how center urban decay will be avoided and the center remain vibrant should Ukiah build outwards. Include in this analysis a thorough presentation of the County vs City conflict in revenue sharing, with mitigations.

**Part 2: RESPECT FOR HISTORY AND TRADITION.** Many urban problems come about from a lack of respect for history and tradition. Ukiah is blessed with a solid housing, ranging from very historic to moderately historic. Examples of 'very historic' are in the 'downtown' core and within its immediate historic blocks, e.g., the Wagensellers Neighborhood, but also scattered widely in individual dwellings and other buildings. 'Moderately historic' is exemplified by the Garden section of housing, a collection of modest houses built on the flat-roofed style of the 50's and early 60's, reminiscent of Frank Lloyd Wright's Usonian House (The State of California considers a structure older than 50 years as possibly historic.) The EIR should go into some detail describing Ukiah's existing housing stock and how it contributes to the continuity economic vitality of the community.

Sincerely,

Pinky Kushner  
504 N. Oak St. #4  
Ukiah, CA 95482



510 459-8289 mobile

PS This includes comments I made at the General Plan 2040 on line. pk

# Appendix B

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Supporting Biological Resources Information

**Table 1 Special-Status Wildlife Species with the Potential to Occur in the Ukiah Park Vicinity**

Common Name	Scientific Name	Agency Status (Federal/State/ Other)	Habitat Requirements
<b>Reptiles</b>			
Western pond turtle	<i>Emys marmorata</i>	–/–/SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.
<b>Amphibians</b>			
California giant salamander	<i>Dicamptodon ensatus</i>	–/–/SSC	Known from wet coastal forests near streams and seeps from Mendocino County south to Monterey County, and east to Napa County. Aquatic larvae found in cold, clear streams, occasionally in lakes and ponds. Adults known from wet forests under rocks and logs near streams and lakes.
foothill yellow-legged frog	<i>Rana boylei</i>	–/SE/SSC	Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Needs at least some cobble-sized substrate for egg-laying. Needs at least 15 weeks to attain metamorphosis.
red-bellied newt	<i>Taricha rivularis</i>	–/–/SSC	Coastal drainages from Humboldt County south to Sonoma County, inland to Lake County. Isolated population of uncertain origin in Santa Clara County. Lives in terrestrial habitats, juveniles generally underground, adults active at surface in moist environments. Will migrate over 1 km to breed, typically in streams with moderate flow and clean, rocky substrate.
<b>Invertebrates</b>			
obscure bumble bee	<i>Bombus caliginosus</i>	–/–/–	Coastal areas from Santa Barbara County to north to Washington state. Food plant genera include Baccharis, Cirsium, Lupinus, Lotus, Grindelia and Phacelia.
western bumble bee	<i>Bombus occidentalis</i>	–/–/–	Once common and widespread, species has declined precipitously from central CA to southern B.C., perhaps from disease. .
<b>Fish</b>			
Clear Lake tule perch	<i>Hysterocarpus traskii lagunae</i>	–/–/SSC	This subspecies is confined to Clear Lake and to Upper and Lower Blue lakes
Steelhead-central California coast	<i>Oncorhynchus mykiss irideus</i>	FT/–/–	Inhabits fresh water, fast flowing, highly oxygenated, clear, cool stream where riffles tend to predominate pools; small streams with high elevation headwaters close to the ocean that have no impassible barriers; spawning: high elevation headwaters.

Common Name	Scientific Name	Agency Status (Federal/State/ Other)	Habitat Requirements
<b>Birds</b>			
northern goshawk	<i>Accipiter gentilis</i>	–/–/SSC	Within, and in vicinity of, coniferous forest. Uses old nests, and maintains alternate sites. Usually nests on north slopes, near water. Red fir, lodgepole pine, Jeffrey pine, and aspens are typical nest trees.
Tricolored blackbird	<i>Agelaius tricolor</i>	–/ST/SSC	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few km of the colony.
Grasshopper sparrow	<i>Ammodramus savannarum</i>	–/–/SSC	Dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs and scattered shrubs. Loosely colonial when nesting.
Western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	FT/SE/SSC	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems.
bald eagle	<i>Haliaeetus leucocephalus</i>	FD/SE/FP	Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.
northern spotted owl	<i>Strix occidentalis caurina</i>	FT/ST/SSC	Old-growth forests or mixed stands of old-growth and mature trees. Occasionally in younger forests with patches of big trees.
<b>Mammals</b>			
pallid bat	<i>Antrozous pallidus</i>	–/–/SSC	Found in a variety of habitats including deserts, grasslands, shrublands, woodlands, and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts in crevices of rock outcrops, caves, mine tunnels, buildings, bridges, and hollows of live and dead trees which must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.
Sonoma tree vole	<i>Arborimus pomo</i>	–/–/SSC	Occurs in the North coast fog belt from Oregon border to Sonoma County. Habitats include Douglas-fir, redwood and montane hardwood-conifer forests. Feeds almost exclusively on Douglas-fir needles. Will occasionally take needles of grand fir, hemlock, or spruce. Nests in trees and may use old nests of birds, squirrels, or woodrats.

Common Name	Scientific Name	Agency Status (Federal/State/ Other)	Habitat Requirements
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	–/–/SSC	Occurs throughout California in a wide variety of habitats. Most common in mesic sites, typically coniferous or deciduous forests. Roosts in the open, hanging from walls & ceilings in caves, lava tubes, bridges, and buildings. This species is extremely sensitive to human disturbance.
Fisher	<i>Pekania pennanti</i>	–/–/SSC	Intermediate to large-tree stages of coniferous forests and deciduous-riparian areas with high percent canopy closure. Uses cavities, snags, logs and rocky areas for cover and denning. Needs large areas of mature, dense forest.

FE=Federally Endangered

SE=State Endangered

FP = CDFW fully protected

FT=Federally Threatened

ST=State Threatened

SSC = CDFW species of special concern

FC=Federal Candidate

CFP=California Fully Protected

Rare = Rare species, State ranking as rare

DL=Federal Delisted

CSC=California Species of Concern

MMPA=Marine Mammal Protection Act

Source: California Natural Diversity Database (CNDDB) (USGS 7.5-minute Novato and eight surrounding quadrangles), April 2018

**Table 2 Special-Status Plants with the Potential to Occur in the Ukiah Vicinity**

Common Name	Scientific Name	Agency Status (Federal/State/ CRPR/Other)	Habitat Requirements
Raiche's manzanita	<i>Arctostaphylos stanfordiana ssp. raichei</i>	–/–/1B.1	Perennial evergreen shrub. Chaparral, lower montane coniferous forest. Rocky, serpentinite (often). Elevations: 1475-3395ft. (450-1035m.) Blooms Feb-Apr.
Sonoma sunshine	<i>Blennosperma bakeri</i>	FE/SE/1B.1	Annual herb. Valley and foothill grassland, vernal pools. Vernal pools and swales. Elevations: 35-360ft. (10-110m.) Blooms Mar-May.
Watershield	<i>Brasenia schreberi</i>	–/–/2B.3	Perennial rhizomatous herb (aquatic). Marshes and swamps. Aquatic known from water bodies both natural and artificial in California. 1-. Elevations: 0-7220ft. (0-2200m.) Blooms Jun-Sep.
bristly sedge	<i>Carex comosa</i>	–/–/2B.1	Perennial rhizomatous herb. Coastal prairie, marshes and swamps, valley and foothill grassland. Lake margins, wet places; site below sea level is on a Delta island. Elevations: 0-2050ft. (0-625m.) Blooms May-Sep.
Rincon Ridge ceanothus	<i>Ceanothus confusus</i>	–/–/1B.1	Perennial evergreen shrub. Chaparral, cismontane woodland, closed-cone coniferous forest. Serpentinite (sometimes), volcanic (sometimes). Elevations: 245-3495ft. (75-1065m.) Blooms Feb-Jun.

Common Name	Scientific Name	Agency Status (Federal/State/ CRPR/Other)	Habitat Requirements
serpentine cryptantha	<i>Cryptantha dissita</i>	–/–/1B.2	Annual herb. Chaparral. Serpentine outcrops. Elevations: 1295-1905ft. (395-580m.) Blooms Apr-Jun.
Koch’s cord moss	<i>Entosthodon kochii</i>	–/–/1B.3	Moss. Cismontane woodland. Moss growing on soil on river banks. Elevations: 590-3280ft. (180-1000m.)
Roderick’s fritillary	<i>Fritillaria roderickii</i>	–/SE/1B.1	Perennial bulbiferous herb. Coastal bluff scrub, coastal prairie, valley and foothill grassland. Grassy slopes, mesas. Elevations: 50-1310ft. (15-400m.) Blooms Mar-May.
Boggs Lake hedge- hyssop	<i>Gratiola heterosepala</i>	–/SE/1B.2	Annual herb. Marshes and swamps, vernal pools. Clay soils; usually in vernal pools, sometimes on lake margins. Elevations: 35-7790ft. (10-2375m.) Blooms Apr-Aug.
Toren’s grimmia	<i>Grimmia torenii</i>	–/–/1B.3	Moss. Chaparral, cismontane woodland, lower montane coniferous forest. Openings, rocky, boulder and rock walls, serpentine, volcanic. Elevations: 1065-3805ft. (325-1160m.)
Guggolz’s harmonia	<i>Harmonia guggolziorum</i>	–/–/1B.1	Annual herb. Chaparral. Open areas on serpentine. Elevations: 525-640ft. (160-195m.) Blooms Apr-May.
glandular western flax	<i>Hesperolinon adenophyllum</i>	–/–/1B.1	Annual herb. Chaparral, cismontane woodland, valley and foothill grassland. Serpentine soils; generally found in serpentine chaparral. Elevations: 490-4315ft. (150-1315m.) Blooms May-Aug.
Bolander’s horkelia	<i>Horkelia bolanderi</i>	–/–/1B.2	Perennial herb. Chaparral, lower montane coniferous forest, meadows and seeps, valley and foothill grassland. Grassy margins of vernal pools and meadows. Elevations: 1475-3610ft. (450-1100m.) Blooms (May)Jun-Aug.
small groundcone	<i>Kopsiopsis hookeri</i>	–/–/2B.3	Perennial rhizomatous herb (parasitic). North coast coniferous forest. Open woods, shrubby places, generally on Gaultheria shallon. Elevations: 295-2905ft. (90-885m.) Blooms Apr-Aug.
Burke’s goldfields	<i>Pleuropogon Lasthenia burkei</i>	FE/SE/1B.1	Annual herb. Meadows and seeps, vernal pools. Most often in vernal pools and swales. Elevations: 50-1970ft. (15-600m.) Blooms Apr-Jun.
Contra Costa goldfields	<i>Lasthenia conjugens</i>	FE/–/1B.1	Annual herb. Cismontane woodland, playas, valley and foothill grassland, vernal pools. Vernal pools, swales, low depressions, in open grassy areas. Elevations: 0-1540ft. (0-470m.) Blooms Mar-Jun.

Common Name	Scientific Name	Agency Status (Federal/State/ CRPR/Other)	Habitat Requirements
Colusa layia	<i>Layia septentrionalis</i>	–/–/1B.1	Annual herb. Chaparral, cismontane woodland, valley and foothill grassland. Scattered colonies in fields and grassy slopes in sandy or serpentine soil. Elevations: 330-3595ft. (100-1095m.) Blooms Apr-May.
Baker's meadowfoam	<i>Limnanthes bakeri</i>	–/SR/1B.1	Annual herb. Marshes and swamps, meadows and seeps, valley and foothill grassland, vernal pools. Seasonally moist or saturated sites within grassland; also in swales, roadside ditches and margins of freshwater marshy areas. Elevations: 575-2985ft. (175-910m.) Blooms Apr-May.
Baker's navarretia	<i>Navarretia leucocephala</i> <i>ssp. bakeri</i>	–/–/1B.1	Annual herb. Cismontane woodland, lower montane coniferous forest, meadows and seeps, valley and foothill grassland, vernal pools. Vernal pools and swales; adobe or alkaline soils. Elevations: 15-5710ft. (5-1740m.) Blooms Apr-Jul.
white-flowered rein orchid	<i>Piperia candida</i>	–/–/1B.2	Perennial herb. Broadleafed upland forest, lower montane coniferous forest, north coast coniferous forest. Sometimes on serpentine. Forest duff, mossy banks, rock outcrops, and muskeg. Elevations: 100-4300ft. (30-1310m.) Blooms (Mar)May-Sep.
North Coast semaphore grass	<i>Pleuropogon</i> <i>hooverianus</i>	–/ST/1B.1	Perennial rhizomatous herb. Broadleafed upland forest, meadows and seeps, north coast coniferous forest. Wet grassy, usually shady areas, sometimes freshwater marsh; associated with forest environments. Elevations: 35-2200ft. (10-671m.) Blooms Apr-Jun.
angel's hair lichen"	<i>Ramalina thrausta</i>	–/–/2B.1	Fruticose lichen (epiphytic). North coast coniferous forest. On dead twigs and other lichens. Elevations: 245-1410ft. (75-430m.)
Bolander's catchfly	<i>Silene bolanderi</i>	–/–/1B.1	Perennial herb. Chaparral, Cismontane woodland, Lower montane coniferous forest, Meadows and seeps, North Coast coniferous forest. Openings (usually), Roadsides (sometimes), Rocky (sometimes), Serpentine (sometimes). Elevations: 420-1150m (1380-775ft). Blooms May-Jun.
Hoffman's bristly jewelflower	<i>Streptanthus glandulosus</i> ssp. <i>hoffmanii</i>	–/–/1B.3	Annual herb. Chaparral, cismontane woodland, valley and foothill grassland. Moist, steep rocky banks, in serpentine and non-serpentine soil. Elevations: 395-1560ft. (120-475m.) Blooms Mar-Jul.



Common Name	Scientific Name	Agency Status (Federal/State/ CRPR/Other)	Habitat Requirements
beaked tracyina	<i>Tracyina rostrata</i>	–/–/1B.2	Annual herb. Chaparral, cismontane woodland, valley and foothill grassland. Open grassy meadows usually within oak woodland and grassland habitats. Elevations: 295-4165ft. (90-1270m.) Blooms May-Jun.
Santa Cruz clover	<i>Trifolium buckwestiorum</i>	–/–/1B.1	Annual herb. Broadleafed upland forest, cismontane woodland, coastal prairie. Moist grassland. Gravelly margins. Elevations: 345-2000ft. (105-610m.) Blooms Apr-Oct.
oval-leaved viburnum	<i>Viburnum ellipticum</i>	–/–/2B.3	Perennial deciduous shrub. Chaparral, cismontane woodland, lower montane coniferous forest. Elevations: 705-4595ft. (215-1400m.) Blooms May-Jun.

FE = Federally Endangered  
 FT = Federal Threatened  
 SE = California State Endangered  
 ST = California State Threatened

**California Native Plant Society (CNPS)**  
 1A: Plants presumed extinct in California  
 1B: Plants rare, threatened, or endangered in California and elsewhere  
 2: Plants rare, threatened, or endangered in California, but more common elsewhere.  
 3: Plants about which we need more information.  
 4: Plants of limited distribution, a watch list.

**California Rare Plant Rank (CRPR)**  
 0.1 – Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)  
 0.2 – Fairly endangered in California (20-80% occurrences threatened)  
 0.3 – Not very endangered in California (<20% of occurrences threatened or no current threats known)

Sources: California Native Plant Society (CNPS) (USGS 7.5-minute Novato and eight surrounding quadrangles), October 2016 California Natural Diversity Database (CNDDB) (USGS 7.5-minute Novato and eight surrounding quadrangles), November 2016

# Appendix C

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Supporting Noise Information

Traffic Noise Calculator: FHWA 77-108

Project Title: 19-07409 Ukiah General Plan Upd

Output Existing Traffic										Inputs Existing Traffic										Auto Inputs										Vehicles per Hour										Calculation Area										Totals: Daytime										Totals: Evening										Totals: Night										Time of Day Averages	
ID	Lane	Speed	CNTL	0	70 dBA	65 dBA	60 dBA	Roadway	AOT	Posted Speed Limit	Grade	% Autos	% Med Trucks	% Heavy Trucks	% Daytime	% Evening	% Night	Number of Lanes	Site Condition	Distance to Receiver	Ground Absorption	Lane Distance	Daytime Autos	Daytime Med Truck	Daytime Heavy Truck	Evening Autos	Evening Med Truck	Evening Heavy Truck	Night Autos	Night Med Truck	Night Heavy Truck	Reference Level	Autos	Med Trucks	Heavy Trucks	Equivalent Noise	Distance Ref	Distance Propag	Flow: Daytime	Autos	Med Truck	Heavy Truck	Flow: Evening	Autos	Med Truck	Heavy Truck	Flow: Night	Autos	Med Truck	Heavy Truck	Day Leq	Evening Leq	Night Leq																												
7120	32.9	36.6	37.0	0	1	1	1	ORCHARD AVE EXTENS	14	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	0.13	0.2	0.0	0.4	11.3	0.1	0.2	5.7	0.1	0.1	65.1	74.8	80.0	99.5	-4.6	4.5	0	-30.8	-50.7	-47.6	-33.5	-53.4	-50.4	-36.5	-56.4	-53.4	31.7	22.8	31.7	28.9	18.7	25.9	28.9	24.6	28.9	28.9																							
7131	48.2	51.9	52.3	3	7	15	1	ORCHARD AVE EXTENS	351	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	21.3	0.2	0.4	11.3	0.1	0.2	5.7	0.1	0.1	65.1	74.8	80.0	99.5	-4.6	4.5	0	-17.5	-37.3	-34.3	-20.1	-40.1	-37.1	-23.2	-43.1	-40.1	47.4	45.6	44.8	34.7	42.9	41.8	31.7	39.9	50.0	47.2	44.2																							
7133	54.0	57.7	58.1	3	7	17	37	ORCHARD AVE EXTENS	1330	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	80.6	0.8	1.7	43.0	0.4	0.9	21.5	0.2	0.4	65.1	74.8	80.0	99.5	-4.6	4.5	0	-11.7	-31.5	-28.5	-14.4	-34.3	-31.3	-17.4	-37.3	-34.3	53.4	43.2	51.4	50.6	40.5	48.7	47.6	37.5	45.7	55.8	53.0	50.0																						
7274	64.9	68.6	69.0	43	92	199	146	TALMAGE ROAD	16358	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	991.7	10.2	20.0	528.9	5.5	10.9	264.5	2.7	5.5	65.1	74.8	80.0	99.5	-4.6	4.5	0	-0.8	-20.7	-17.6	-3.5	-23.4	-20.4	-6.5	-26.4	-23.4	64.3	54.1	62.3	61.5	51.4	59.6	58.5	48.4	56.6	66.7	63.9	60.0																						
7128	35.6	39.3	39.7	0	1	1	1	FORD ROAD	37	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	2.2	0.0	0.0	1.2	0.0	0.0	1.2	0.0	0.0	59.4	71.1	77.2	99.5	-4.6	4.5	0	-25.8	-45.6	-42.6	-28.5	-48.4	-45.4	-31.5	-51.4	-48.4	33.6	25.4	34.5	30.9	22.6	31.8	27.9	19.6	28.8	37.4	34.7	31.6																						
7130	43.1	46.8	47.2	1	1	1	1	MASON STREET	53	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	2.0	0.1	0.1	1.1	0.1	0.1	1.1	0.1	0.1	59.4	71.1	77.2	99.5	-4.6	4.5	0	-24.1	-43.9	-40.9	-26.8	-46.6	-43.6	-29.9	-49.7	-46.7	31.7	23.6	32.7	29.1	21.1	30.2	26.5	18.4	27.6	36.2	33.4																							
7109	42.7	46.4	46.8	1	3	7	85	OAK KNOLL ROAD	190	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	11.5	0.1	0.2	6.1	0.1	0.1	3.1	0.0	0.1	59.4	71.1	77.2	99.5	-4.6	4.5	0	-18.7	-38.5	-35.5	-21.4	-41.3	-38.3	-24.4	-44.3	-41.3	40.7	32.5	41.6	38.0	29.7	38.9	35.0	26.7	35.9	44.5	41.8	38.7																						
7108	59.4	63.1	63.4	18	39	85	85	SOUTH DORA STREET	4562	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	276.6	2.9	5.7	147.5	1.5	3.0	73.8	0.8	1.5	65.1	74.8	80.0	99.5	-4.6	4.5	0	-6.3	-26.2	-23.2	-9.1	-28.9	-25.9	-12.1	-31.9	-28.9	58.7	48.6	56.8	56.0	45.8	54.1	53.0	42.8	51.0	64.1	58.4	55.4																						
7107	55.3	59.0	59.4	10	21	46	21	MAIN STREET	2469	30	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	149.7	1.5	3.1	79.8	0.8	1.6	39.9	0.4	0.8	62.5	73.1	78.8	99.5	-4.6	4.5	0	-8.3	-28.2	-25.2	-11.1	-30.9	-27.9	-14.1	-33.9	-30.9	54.1	44.8	53.5	51.4	42.1	50.8	48.4	39.1	47.8	57.1	54.4	51.4																						
7106	46.1	49.8	50.2	1	1	1	1	PERKINS STREET	170	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	6.1	0.1	0.2	3.1	0.1	0.1	1.1	0.0	0.1	59.4	71.1	77.2	99.5	-4.6	4.5	0	-18.7	-38.5	-35.5	-21.4	-41.3	-38.3	-24.4	-44.3	-41.3	40.7	32.5	41.6	38.0	29.7	38.9	35.0	26.7	35.9	44.5	41.8	38.7																						
7089	57.2	60.9	61.3	13	28	61	61	LOWERS LANE	3813	30	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	231.2	2.4	4.8	123.3	1.3	2.5	61.6	0.6	1.3	62.5	73.1	78.8	99.5	-4.6	4.5	0	-6.4	-26.3	-23.3	-9.2	-29.0	-26.0	-12.2	-32.0	-29.0	56.0	46.7	55.4	53.3	44.0	52.7	50.3	41.0	49.7	59.0	56.3	53.2																						
7090	59.2	62.9	63.3	18	39	83	83	MAIN STREET	4422	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	268.1	2.8	5.5	143.0	1.5	2.9	71.5	0.7	1.5	65.1	74.8	80.0	99.5	-4.6	4.5	0	-6.5	-26.3	-23.3	-9.2	-29.1	-26.1	-12.2	-32.1	-29.1	58.6	48.4	56.7	55.8	45.7	53.9	52.8	42.7	50.9	61.0	58.2	55.2																						
6995	62.3	66.0	66.4	29	62	134	134	AIRPORT PARK BOULEV	9074	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	550.1	5.7	11.3	293.4	3.0	6.0	146.7	1.5	3.0	65.1	74.8	80.0	99.5	-4.6	4.5	0	-3.3	-23.2	-20.2	-6.1	-25.9	-22.9	-9.1	-29.0	-25.9	61.7	51.5	59.8	59.0	48.8	57.0	56.0	45.8	54.0	64.1	61.4	58.4																						
6994	63.1	66.8	67.2	32	70	151	151	TALMAGE ROAD	10790	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	635.5	6.7	13.5	348.6	3.6	7.2	174.3	1.8	3.6	65.1	74.8	80.0	99.5	-4.6	4.5	0	-2.6	-22.5	-19.5	-5.3	-25.2	-22.2	-8.3	-28.2	-25.2	62.4	52.3	60.5	59.7	49.6	57.8	56.7	46.6	54.8	64.8	62.1	59.1																						
6993	61.2	64.9	65.3	24	52	113	113	AIRPORT PARK BOULEV	5575	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	457.7	4.8	9.7	250.0	2.5	5.0	120.1	1.5	3.0	65.1	74.8	80.0	99.5	-4.6	4.5	0	-2.7	-22.6	-19.6	-5.4	-25.3	-22.3	-8.4	-28.3	-25.3	61.7	51.6	59.9	59.0	48.7	56.9	55.8	45.7	53.9	64.0	61.3	58.3																						
6991	61.2	64.9	65.3	24	52	113	113	SH 222	7020	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	457.7	4.8	9.7	250.0	2.5	5.0	120.1	1.5	3.0	65.1	74.8	80.0	99.5	-4.6	4.5	0	-2.7	-22.6	-19.6	-5.4	-25.3	-22.3	-8.4	-28.3	-25.3	61.7	51.6	59.9	59.0	48.7	56.9	55.8	45.7	53.9	64.0	61.3	58.3																						
6990	39.3	42.9	43.4	1	2	4	4	HASTINGS FRONTAGE R	57	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	3.5	0.0	0.1	1.8	0.0	0.0	1.9	0.0	0.0	59.4	71.1	77.2	99.5	-4.6	4.5	0	-25.4	-45.2	-42.2	-28.1	-48.0	-44.9	-31.0	-51.0	-48.0	39.7	29.5	37.8	36.9	26.8	35.0	33.9	23.8	32.0	42.1	39.3	36.2																						
6989	39.2	42.9	43.4	1	2	4	4	LUCE AVENUE	84	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	3.5	0.1	0.1	1.7	0.0	0.0	1.4	0.0	0.0	59.4	71.1	77.2	99.5	-4.6	4.5	0	-22.2	-42.1	-39.1	-24.1	-44.8	-41.8	-28.0	-47.8	-44.8	37.2	28.9	38.1	36.4	26.7	35.4	34.1	23.2	32.4	40.9	38.2	35.2																						
6988	41.2	44.9	45.3	1	1	1	1	LUCE AVENUE	84	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	3.5	0.1	0.1	1.7	0.0	0.0	1.4	0.0	0.0	59.4	71.1	77.2	99.5	-4.6	4.5	0	-22.2	-42.1	-39.1	-24.1	-44.8	-41.8	-28.0	-47.8	-44.8	37.2	28.9	38.1	36.4	26.7	35.4	34.1	23.2	32.4	40.9	38.2	35.2																						
6987	45.7	49.4	49.8	48	104	224	224	TALMAGE ROAD	19622	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	1189.6	12.3	24.5	634.4	6.5	13.1	317.2	3.3	6.5	65.1	74.8	80.0	99.5	-4.6	4.5	0	-0.0	-19.9	-16.8	-7.2	-22.6	-19.6	-5.7	-25.6	-22.6	65.0	54.9	63.1	62.3	52.2	60.4	59.3	49.2	57.4	67.4	64.7	61.7																						
6986	42.9	46.6	47.0	1	3	7	7	BARBOCK LANE	197	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	11.9	0.1	0.2	6.4	0.1	0.1	3.2	0.0	0.1	59.4	71.1	77.2	99.5	-4.6	4.5	0	-18.5	-38.4	-35.4	-21.2	-41.1	-38.1	-24.3	-44.1	-41.1	40.9	32.6	41.8	38.1	29.9	39.1	35.1	26.9	36.1	44.6	41.9	38.9																						
6984	41.8	45.5	45.8	1	3	6	6	BARBOCK LANE	152	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	9.2	0.1	0.2	4.9	0.1	0.1	2.5	0.0	0.1	59.4	71.1	77.2	99.5	-4.6	4.5	0	-19.6	-39.5	-36.5	-22.4	-42.2	-39.2	-25.4	-45.2	-42.2	39.7	31.5	40.7	37.0	28.8	37.9	34.0	25.8	34.9	43.5	40.8	37.8																						
6982	43.4	47.2	47.5	2	3	6	6	BARBOCK LANE	224	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	13.6	0.1	0.3	7.2	0.1	0.1	3.8	0.0	0.1	59.4	71.1	77.2	99.5	-4.6	4.5	0	-18.0	-37.8	-34.8	-20.7	-40.6	-37.5	-23.7	-43.6	-40.6	41.4	33.2	42.4	38.7	30.5	39.6	35.7	27.5	36.6	45.2	42.5	39.5																						
6981	41.8	45.5	45.8	1	3	6	6	PERKINS STREET	1160	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	16.0	0.1	0.3	8.0	0.1	0.1	4.0																																																				

Traffic Noise Calculator: FHWA 77-108

update

Outage Existing Traffic

Distance to CNEL Contour

Inputs Existing Traffic

Auto Inputs

Vehicles per Hour

Reference Level

Distance Adjustments

Flow: Daytime

Flow: Evening

Flow: Night

Totals: Daytime

Totals: Evening

Totals: Night

Time of Day Averages

ID

Lat

Long

CNEL

70 dBA

65 dBA

60 dBA

Roadway

ADT

Post Speed Limit

Grade

% Autos

% Med Trucks

% Heavy Trucks

% Daytime

% Evening

% Night

Number of Lanes

Site Condition

Distance to Receiver

Ground Absorption

Lane Distance

Daytime Autos

Daytime Med Truck

Daytime Heavy Truck

Evening Autos

Evening Med Truck

Evening Heavy Truck

Night Autos

Night Med Truck

Night Heavy Truck

Autos

Med Trucks

Heavy Trucks

EQUIVALENT Lane

Distance Ref

Distance Propag

Heavy Truck Grade

Autos

Med Truck

Heavy Truck

Autos

Med Truck

Heavy Truck

Autos

Med Truck

Heavy Truck

Autos

Med Truck

Heavy Truck

Autos

Med Truck

Heavy Truck

Day Leq

Evening Leq

Night Leq

6453

36.7

40.4

40.8

1

3

3

PINE STREET

47

25

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

2

Soft

50

0.5

20

2.8

0.0

0.1

0.2

1.5

0.0

0.0

0.8

0.0

0.0

0.0

59.4

71.1

77.2

99.5

-4.6

4.5

0

-24.7

-44.6

-41.6

-27.5

-47.3

-44.3

-30.5

-50.3

-47.3

34.6

26.4

35.6

31.9

23.7

32.8

28.9

20.7

29.8

38.4

35.7

32.7

6452

41.9

45.7

46.0

1

3

3

CHURCH STREET

160

25

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

1

Soft

50

0.5

6

9.7

0.1

0.2

5.2

0.1

0.1

2.6

0.0

0.1

2.6

0.0

0.1

59.4

71.1

77.2

100.0

-4.6

4.5

0

-19.4

-39.3

-36.3

-22.1

-42.0

-39.0

-25.2

-45.0

-42.0

39.9

31.7

40.9

37.2

29.0

38.1

34.2

26.0

35.1

43.7

41.0

38.0

6451

54.7

58.4

58.8

9

19

41

PERKINS STREET

2138

30

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

1

Soft

50

0.5

6

129.6

1.3

2.7

69.1

0.7

1.4

34.6

0.4

0.7

62.5

73.1

78.8

100.0

-4.6

4.5

0

0.0

-28.8

-25.8

-11.7

-31.5

-28.5

-14.7

-34.6

-31.5

53.5

44.2

52.9

50.7

41.5

50.1

47.7

38.5

47.1

56.4

53.7

50.1

6450

37.1

40.8

41.2

1

1

3

BUSH STREET

22

25

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

2

Soft

50

0.5

20

3.2

0.0

0.1

1.7

0.0

0.0

0.8

0.0

0.0

0.0

59.4

71.1

77.2

99.5

-4.6

4.5

0

-24.3

-44.2

-41.2

-27.0

-46.9

-43.9

-30.0

-49.9

-46.9

35.1

26.8

36.0

32.3

24.1

33.3

29.3

21.1

30.3

38.9

36.1

33.1

6449

58.0

61.7

62.1

9

731

78.0

PERKINS STREET

2233

30

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

2

Soft

50

0.5

6

54.0

0.4

0.8

2.8

7.2

0.0

0.1

59.4

71.1

77.2

99.5

-4.6

4.5

0

-24.3

-44.2

-41.2

-27.0

-46.9

-43.9

-30.0

-49.9

-46.9

35.1

26.8

36.0

32.3

24.1

33.3

29.3

21.1

30.3

38.9

36.1

33.1

6448

38.7

42.5

42.8

1

2

4

PINE STREET

76

25

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

2

Soft

50

0.5

20

4.6

0.0

0.1

2.5

0.0

0.1

1.2

0.0

0.0

59.4

71.1

77.2

99.5

-4.6

4.5

0

-22.7

-42.5

-39.5

-25.4

-45.2

-42.2

-28.4

-48.3

-45.2

36.7

28.5

37.0

34.0

25.8

34.9

31.0

22.8

31.9

40.5

37.8

34.8

6447

54.9

58.6

59.0

9

20

43

PERKINS STREET

2255

30

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

1

Soft

50

0.5

6

136.7

1.4

2.8

72.9

0.8

1.5

36.5

0.4

0.8

62.5

73.1

78.8

100.0

-4.6

4.5

0

-8.7

-28.6

-25.6

-11.4

-31.3

-28.3

-14.5

-34.3

-31.3

53.7

44.4

53.1

51.0

41.7

50.4

48.0

38.7

47.3

56.7

53.9

50.9

6446

43.5

47.3

47.6

2

3

7

CHURCH STREET

231

25

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

1

Soft

50

0.5

6

140.2

1.3

2.3

73.5

0.1

0.3

7.5

0.1

0.2

3.7

0.0

0.1

59.4

71.1

77.2

99.5

-4.6

4.5

0

-17.8

-37.7

-34.7

-20.6

-40.4

-37.4

-23.6

-43.4

-40.4

53.5

44.5

53.3

51.5

43.3

52.2

50.8

40.2

39.7

35.8

27.6

36.7

45.3

42.6

39.6

6445

55.7

59.4

59.8

10

23

49

PERKINS STREET

1983

35

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

1

Soft

50

0.5

6

110.2

1.2

2.4

64.1

0.7

1.2

31.3

0.1

0.3

0.7

65.1

74.8

80.0

99.5

-4.6

4.5

0

-19.9

-39.8

-36.8

-22.7

-42.5

-39.5

-25.5

-45.5

-42.5

40.9

32.2

42.8

38.4

30.2

39.4

35.2

24.4

33.4

41.7

38.6

47.1

54.8

51.8

6444

56.3

60.1

60.4

12

25

53

SCHOOL STREET

2281

35

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

2

Soft

50

0.5

20

138.3

1.4

2.9

73.8

0.8

1.5

36.9

0.4

0.8

65.1

74.8

80.0

99.5

-4.6

4.5

0

-9.3

-29.2

-26.2

-12.1

-31.9

-28.9

-15.1

-34.9

-31.9

55.7

45.5

53.8

52.0

42.8

51.0

50.0

39.8

48.0

58.1

55.4

52.4

6443

56.1

59.8

60.2

11

24

52

PERKINS STREET

2989

30

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

1

Soft

50

0.5

6

62.5

1.9

3.7

96.6

1.0

2.0

48.3

0.5

1.0

62.5

73.1

78.8

100.0

-4.6

4.5

0

-7.5

-27.4

-24.4

-10.2

-30.1

-27.1

-13.2

-33.1

-30.1

54.9

45.6

54.3

52.2

42.9

51.6

49.2

39.9

48.6

57.9

55.2

52.2

6440

64.5

68.3

68.6

41

87

188

STATE STREET

14653

35

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

4

Soft

50

0.5

44

888.3

9.2

18.3

479.8

4.9

9.8

236.9

2.4

4.9

65.1

74.8

80.0

97.5

-4.5

4.5

0

-1.3

-21.1

-18.1

-4.0

-23.9

-20.8

-7.0

-26.9

-23.9

63.9

53.8

62.0

61.2

51.0

59.9

58.2

48.0

56.2

66.3

63.6

60.6

6439

64.0

67.8

68.1

37

80

178

PERKINS STREET

12801

35

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

2

Soft

50

0.5

20

1280.1

12.8

25.6

640.1

6.4

12.8

320.0

3.2

6.4

65.1

74.8

80.0

97.5

-4.5

4.5

0

-1.3

-21.1

-18.1

-4.0

-23.9

-20.8

-7.0

-26.9

-23.9

63.9

53.8

62.0

61.2

51.0

59.9

58.2

48.0

56.2

66.3

63.6

60.6

6438

56.9

60.6

61.0

13

27

58

MAIN STREET

2609

35

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

2

Soft

50

0.5

20

158.2

1.6

3.3

78.4

0.9

1.7

42.2

0.4

0.9

65.1

74.8

80.0

99.5

-4.6

4.5

0

-8.8

-28.6

-25.6

-11.5

-31.4

-28.3

-14.5

-34.4

-31.4

56.3

46.1

54.4

53.6

43.4

51.6

50.5

40.4

48.6

58.7

56.0

52.9

6424

65.1

68.8

69.2

44

95

205

STATE STREET

16655

35

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

4

Soft

50

0.5

44

1009.7

10.4

20.8

538.5

5.6

11.1

269.3

2.8

5.6

65.1

74.8

80.0

97.5

-4.5

4.5

0

-0.7

-20.6

-17.6

-3.4

-23.3

-20.3

-6.4

-26.3

-23.3

64.5

54.3

62.5

61.7

51.6

59.8

58.7

48.6

56.8

66.9

64.1

61.1

6423

54.6

58.3

58.7

9

19

41

SCHOOL STREET

1524

35

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

2

Soft

50

0.5

20

92.4

1.0

1.9

49.3

0.5

1.0

24.6

0.3

0.5

65.1

74.8

80.0

99.5

-4.6

4.5

0

-11.1

-31.0

-27.9

-13.8

-33.7

-30.7

-16.8

-36.7

-33.7

53.9

43.8

52.0

51.2

41.1

49.3

48.2

38.1

46.3

56.4

53.6

50.6

6422

53.7

57.4

57.8

8

17

36

DAK STREET

1250

35

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

2

Soft

50

0.5

20

75.8

0.8

1.6

40.4

0.4

0.8

20.2

0.2

0.4

65.1

74.8

80.0

99.5

-4.6

4.5

0

-12.0

-31.8

-28.8

-14.7

-34.5

-31.5

-17.7

-37.6

-34.6

55.4

45.9

54.2

53.4

43.2

51.4

50.4

40.4

48.6

58.7

55.9

52.9

6408

37.4

41.1

41.4

1

1

3

BUSH STREET

74

25

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

2

Soft

50

0.5

20

4.6

0.0

0.1

2.4

0.0

0.1

1.2

0.0

0.0

59.4

71.1

77.2

99.5

-4.6

4.5

0

-22.0

-41.8

-38.8

-24.7

-44.6

-41.6

-22.8

-42.6

-39.6

35.4

27.9

36.3

33.4

24.4

33.6

31.6

21.6

30.6

40.6

37.6

34.6

6404

36.6

40.3

40.7

1

1

3

SMITH STREET

47

25

0.0%

97.0%

1.0%

2.0%

75.0%

10.0%

15.0%

1

Soft

50

0.5

6

2.8

0.0

0.1

1.5

0.0

0.0

0.8

0.0

0.0

59.4

71.1

77.2

100.0

-4.6

4.5

0

-24.7

-44.6

-41.6

-27.5

-47.3

-44.3

-30.5

-50.3

-47.3

34.6

26.4

35.5

31.9

23.6

32.8

28.9

20.6

29.8

38.4

35.7

32.6

6381

39.4

43.1

43.5

 1 | 2 | 4 | BUSH STREET | 88 | 25 | 0.0% | 97.0% | 1.0% | 2.0% | 75.0% | 10.0% | 15.0% | 2 | Soft | 50 | 0.5 | 20 | 5.3 | 0.1 | 0.1 | 1.5 | 0.0 | 0.1 | 1.4 | 0.0 | 0.0 | 59.4 | 71.1 | 77.2 | 99.5 | -4.6 | 4.5 | 0 | -22.0 | -41.9 | -38.9 | -24.7 | -44.6 | -41.6 | -27.8 | -47.6 | -44.6 | 37.4 | 29.1 | 38.3 | 34.6 | 26.4 | 35.6 | 31.6 | 23.4 | 32.6 | 41.1 | 38.4 | 35.4 |



Traffic Noise Calculator: FHWA 70-108										Project Title: 19-07409 Ukiah General Plan Update																			
Output Existing Traffic										Inputs Existing Traffic										Auto Inputs									
at 50 feet										Distance to CNEL Contour										Auto Inputs									
ID	L <sub>eq</sub> 24hr	CNEL	70 dBA	65 dBA	60 dBA	Roadway	ADT	Posted Speed Limit	Grade	% Autos	% Med Trucks	% Heavy Trucks	% Daytime	% Evening	% Night	Number of Lanes	Site Condition	Distance to Receiver	Ground Absorption	Lane Distance	Daytime Autos	Daytime Med Truck	Daytime Heavy	Evening Autos	Evening Med Truck	Evening Heavy	Night Autos	Night Med Truck	Night Heavy













Output Existing Traffic										Inputs Existing Traffic															Calculation Area																																										
dBA at 50 feet										Auto Inputs															Calculation Area																																										
Distance to CNEL Contour										Vehicles per Hour															Flow: Daytime															Flow: Evening					Flow: Night					Totals: Daytime					Totals: Evening					Totals: Night					Time of Day Averages		
ID	L <sub>eq,24hr</sub>	L <sub>dn</sub>	CNEL	70 dBA	65 dBA	60 dBA	Roadway	ADT	Posted Speed Limit	Grade	% Autos	% Med Trucks	% Heavy Trucks	% Daytime	% Evening	% Night	Number of Lanes	Site Condition	Distance to Receiver	Ground Absorption	Lane Distance	Daytime Autos	Daytime Med Truck	Daytime Heavy	Evening Autos	Evening Med Truck	Evening Heavy	Night Autos	Night Med Truck	Night Heavy	Autos	Med Trucks	Heavy Trucks	Equivalent Lane	Distance Ref	Distance Adj	Distance Propag	Heavy Truck Grade	Autos	Med Truck	Heavy Truck	Autos	Med Truck	Heavy Truck	Autos	Med Truck	Heavy Truck	Autos	Med Truck	Heavy Truck	Autos	Med Truck	Heavy Truck	Day Leq	Evening Leq	Night Leq											
1328	41.1	44.8	45.2	1	2	5	BEACON LANE	131	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	7.9	0.1	0.2	4.2	0.0	0.1	2.1	0.0	0.0	59.4	71.1	77.2	99.5	-4.6	4.5	0	-20.3	-40.2	-37.1	-23.0	-42.9	-39.9	-26.0	-45.9	-42.9	39.1	30.9	40.0	36.4	28.1	37.3	33.3	25.1	34.3	42.9	40.1	37.1									
1325	19.9	23.6	24.0	0	0	0	CRESTA DRIVE	1	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	59.4	71.1	77.2	99.5	-4.6	4.5	0	-41.5	-61.3	-58.3	-44.2	-64.1	-61.0	-47.2	-67.1	-64.1	17.9	9.7	18.9	15.2	7.0	16.1	12.2	3.9	13.1	21.7	19.0	16.0									
1324	59.8	63.5	63.9	20	42	91	WASHINGTON AVENUE	5056	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	306.5	3.2	6.3	163.5	1.7	3.4	81.7	0.8	1.7	65.1	74.8	80.0	99.5	-4.6	4.5	0	-5.9	-25.7	-22.7	-8.6	-28.5	-25.5	-11.6	-31.5	-28.5	59.2	49.0	57.2	56.4	46.3	54.5	53.4	43.3	51.5	61.6	58.8	55.8									
1320	45.1	48.8	49.2	2	4	10	LAWS AVENUE	328	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	19.9	0.2	0.4	10.6	0.1	0.2	5.3	0.1	0.1	59.4	71.1	77.2	99.5	-4.6	4.5	0	-16.3	-36.2	-33.2	-19.0	-38.9	-35.9	-22.0	-41.9	-38.9	43.1	34.8	44.0	40.3	32.1	41.3	37.3	29.1	38.3	46.9	44.1	41.1									
1319	51.3	55.0	55.4	5	11	25	SOUTH DORA STREET	969	30	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	58.7	0.6	1.2	31.3	0.3	0.6	15.7	0.2	0.3	62.5	73.1	78.8	99.5	-4.6	4.5	0	-12.4	-32.3	-29.2	-15.1	-35.0	-32.0	-18.1	-36.0	-35.0	50.1	40.8	49.4	47.3	38.1	46.7	44.3	35.0	43.7	53.0	50.3	47.3									
1307	67.8	71.5	71.9	67	145	311	US 101	11515	55	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	698.1	7.2	14.4	372.3	3.8	7.7	186.2	1.9	3.8	72.7	79.9	83.8	99.5	-4.6	4.5	0	-4.3	-24.1	-21.1	-7.0	-26.9	-23.9	-10.0	-29.9	-26.9	68.4	55.6	62.6	65.7	52.9	59.9	62.6	49.9	56.9	69.6	66.9	63.8									
1306	69.1	72.8	73.2	81	176	378	US 101	15416	55	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	934.6	9.6	19.3	498.5	5.1	10.3	249.2	2.6	5.1	72.7	79.9	83.8	99.5	-4.6	4.5	0	-3.0	-22.9	-19.9	-5.7	-25.6	-22.6	-8.7	-28.6	-25.6	69.7	56.9	63.9	66.9	54.2	61.2	63.9	51.2	58.1	70.9	68.1	65.1									
410	59.4	63.1	63.5	18	40	85	GOBBI STREET	4601	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	278.9	2.9	5.8	148.8	1.5	3.1	74.4	0.8	1.5	65.1	74.8	80.0	99.5	-4.6	4.5	0	-6.3	-26.2	-23.1	-9.0	-28.9	-25.9	-12.0	-31.9	-28.9	58.7	48.6	56.8	56.0	45.9	54.1	53.0	42.9	51.1	61.1	58.4	55.4									
408	54.8	58.5	58.8	9	19	42	DORA STREET	2160	30	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	131.0	1.4	2.7	69.8	0.7	1.4	34.9	0.4	0.7	62.5	73.1	78.8	99.5	-4.6	4.5	0	-8.9	-28.8	-25.8	-11.6	-31.5	-28.5	-14.6	-34.5	-31.5	53.5	44.3	52.9	50.8	41.5	50.2	47.8	38.5	47.2	56.5	53.8	50.8									
407	48.2	51.9	52.3	3	7	15	MILL STREET	673	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	40.8	0.4	0.8	21.8	0.2	0.4	10.9	0.1	0.2	59.4	71.1	77.2	99.5	-4.6	4.5	0	-13.2	-33.0	-30.0	-15.9	-35.8	-32.8	-18.9	-38.8	-35.8	46.2	38.0	47.1	43.5	35.2	44.4	40.4	32.2	41.4	50.0	47.2	44.2									
405	56.2	59.9	60.3	11	24	52	DORA STREET	3015	30	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	182.8	1.9	3.8	97.5	1.0	2.0	48.7	0.5	1.0	62.5	73.1	78.8	99.5	-4.6	4.5	0	-7.5	-27.3	-24.3	-10.2	-30.1	-27.0	-13.2	-33.1	-30.1	55.0	45.7	54.4	52.3	43.0	51.6	49.2	40.0	48.6	58.0	55.2	52.2									
404	54.4	58.1	58.5	9	18	40	DORA STREET	1989	30	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	120.6	1.2	2.5	64.3	0.7	1.3	32.2	0.3	0.7	62.5	73.1	78.8	99.5	-4.6	4.5	0	-9.3	-29.1	-26.1	-12.0	-31.9	-28.9	-15.0	-34.9	-31.9	53.2	43.9	52.6	50.4	41.2	49.8	47.4	38.2	46.8	56.2	53.4	50.4									
403	48.2	51.9	52.3	3	7	15	MILL STREET	673	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	40.8	0.4	0.8	21.8	0.2	0.4	10.9	0.1	0.2	59.4	71.1	77.2	99.5	-4.6	4.5	0	-13.2	-33.0	-30.0	-15.9	-35.8	-32.8	-18.9	-38.8	-35.8	46.2	38.0	47.1	43.5	35.2	44.4	40.4	32.2	41.4	50.0	47.2	44.2									
402	57.4	61.1	61.5	14	29	63	OAK STREET	2928	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	177.5	1.8	3.7	94.7	1.0	2.0	47.3	0.5	1.0	65.1	74.8	80.0	99.5	-4.6	4.5	0	-8.3	-28.1	-25.1	-11.0	-30.9	-27.8	-14.0	-31.9	-30.9	56.8	46.6	54.9	54.1	43.9	52.1	51.0	40.9	49.1	59.2	56.5	53.4									
400	59.5	63.2	63.6	19	40	87	GOBBI STREET	4697	35	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	284.8	2.9	5.9	151.9	1.6	3.1	75.9	0.8	1.6	65.1	74.8	80.0	99.5	-4.6	4.5	0	-6.2	-26.1	-23.1	-8.9	-28.8	-25.8	-11.9	-31.8	-28.8	58.8	48.7	56.9	56.1	46.0	54.2	53.1	42.9	51.2	61.2	58.5	55.5									
399	53.8	57.5	57.9	8	17	36	DORA STREET	1733	30	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	105.1	1.1	2.2	56.0	0.6	1.2	28.0	0.3	0.6	62.5	73.1	78.8	99.5	-4.6	4.5	0	-9.9	-29.7	-26.7	-12.6	-32.5	-29.4	-15.6	-35.5	-32.5	52.6	43.3	52.0	49.8	40.6	49.2	46.8	37.6	46.2	55.6	52.8	49.8									
398	35.0	38.7	39.1	0	1	2	HORTENSE STREET	32	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	1.9	0.0	0.0	1.0	0.0	0.0	0.5	0.0	0.0	59.4	71.1	77.2	99.5	-4.6	4.5	0	-26.4	-46.3	-43.3	-29.1	-49.0	-46.0	-32.1	-52.0	-49.0	33.0	24.7	33.9	30.2	22.0	31.2	27.2	19.0	28.2	36.8	34.0	31.0									
397	45.5	49.2	49.6	2	5	10	STEPHENSON STREET	361	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	21.9	0.2	0.5	11.7	0.1	0.2	5.8	0.1	0.1	59.4	71.1	77.2	99.5	-4.6	4.5	0	-15.9	-35.8	-32.7	-18.6	-38.5	-35.5	-21.6	-41.5	-38.5	43.5	35.3	44.4	40.8	32.5	41.7	37.7	29.5	38.7	47.3	44.5	41.5									
396	44.6	48.3	48.7	2	4	9	CHURCH STREET	290	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	17.6	0.2	0.4	9.4	0.1	0.2	4.7	0.0	0.0	0.1	59.4	71.1	77.2	99.5	-4.6	4.5	0	-26.8	-46.7	-43.7	-29.6	-49.6	-46.6	-32.7	-52.6	-49.6	32.4	24.2	33.3	29.7	21.4	30.9	26.6	18.4	27.6	36.2	33.4	30.4								
395	34.4	38.1	38.5	0	1	2	HORTENSE STREET	28	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	59.4	71.1	77.2	99.5	-4.6	4.5	0	-11.4	-31.3	-28.3	-14.2	-34.0	-31.0	-17.2	-37.0	-34.0	47.9	39.7	48.9	45.2	37.0	46.3	42.2	34.0	43.1	51.5	48.0	46.0									
394	50.0	53.7	54.0	4	9	20	PERKINS STREET	1004	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	59.6	0.9	1.8	32.5	0.3	0.7	16.2	0.2	0.3	59.4	71.1	77.2	99.5	-4.6	4.5	0	-10.4	-30.3	-27.3	-13.2	-33.0	-30.0	-16.2	-36.1	-33.0	52.0	42.7	51.4	49.3	40.0	48.7	46.3	37.0	45.6	55.0	52.2	49.2									
393	53.2	56.9	57.3	7	15	33	DORA STREET	1514	30	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	91.8	0.9	1.9	49.0	0.5	1.0	24.5	0.3	0.5	62.5	73.1	78.8	99.5	-4.6	4.5	0	-10.6	-30.5	-27.4	-13.3	-33.2	-30.2	-16.3	-36.2	-33.2	48.8	40.6	49.7	46.0	37.8	47.0	43.0	34.8	44.0	52.6	49.8	46.8									
392	50.8	54.5	54.9	5	11	23	CLAY STREET	1222	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	74.1	0.8	1.5	39.5	0.4	0.8	19.8	0.2	0.4	59.4	71.1	77.2	99.5	-4.6	4.5	0	-24.2	-44.1	-41.1	-26.9	-46.8	-43.8	-30.0	-49.8	-46.8	35.2	26.9	36.1	32.4	24.2	33.4	29.4	21.2	30.4	38.9	36.2	33.2									
391	37.2	40.9	41.3	1	1	3	SPRING STREET	53	25	0.0%	97.0%	1.0%	2.0%	75.0%	10.0%	15.0%	2	Soft	50	0.5	20	3.2	0.0	0.1	1.7	0.0	0.0	0.0	0.0	0.0	59.4	71.1	77.2	99.5																																	







Date		Time		Location		Weather		Temperature		Humidity		Wind		Pressure		Visibility		Clouds		Precipitation		Sun		Moon		Tide		Notes																			
Day	Month	Year	Hour	Minute	City	State	Country	Temp (F)	Temp (C)	Humid (%)	Wind (MPH)	Wind (KPH)	Press (in)	Press (hPa)	Vis (mi)	Cloud (%)	Precip (in)	Sunrise	Sunset	Moonrise	Moonset	Tide	Notes	Day	Month	Year	Hour	Minute	City	State	Country	Temp (F)	Temp (C)	Humid (%)	Wind (MPH)	Wind (KPH)	Press (in)	Press (hPa)	Vis (mi)	Cloud (%)	Precip (in)	Sunrise	Sunset	Moonrise	Moonset	Tide	Notes
1	1	2025	12	01	New York	NY	USA	32	0	65	10	16	30.0	1013	10	100	0.0	7:08	16:52	18:45	6:05	Low	Clear	1	1	2025	12	01	New York	NY	USA	32	0	65	10	16	30.0	1013	10	100	0.0	7:08	16:52	18:45	6:05	Low	Clear
2	1	2025	12	02	New York	NY	USA	30	-1	60	12	19	29.9	1012	12	100	0.0	7:19	16:41	18:56	5:54	Low	Clear	2	1	2025	12	02	New York	NY	USA	30	-1	60	12	19	29.9	1012	12	100	0.0	7:19	16:41	18:56	5:54	Low	Clear
3	1	2025	12	03	New York	NY	USA	28	-2	55	14	28	29.8	1011	14	100	0.0	7:30	16:30	19:07	5:43	Low	Clear	3	1	2025	12	03	New York	NY	USA	28	-2	55	14	28	29.8	1011	14	100	0.0	7:30	16:30	19:07	5:43	Low	Clear
4	1	2025	12	04	New York	NY	USA	26	-3	50	16	37	29.7	1010	16	100	0.0	7:41	16:19	19:18	5:32	Low	Clear	4	1	2025	12	04	New York	NY	USA	26	-3	50	16	37	29.7	1010	16	100	0.0	7:41	16:19	19:18	5:32	Low	Clear
5	1	2025	12	05	New York	NY	USA	24	-4	45	18	46	29.6	1009	18	100	0.0	7:52	16:08	19:29	5:21	Low	Clear	5	1	2025	12	05	New York	NY	USA	24	-4	45	18	46	29.6	1009	18	100	0.0	7:52	16:08	19:29	5:21	Low	Clear
6	1	2025	12	06	New York	NY	USA	22	-5	40	20	55	29.5	1008	20	100	0.0	8:03	15:57	19:40	5:10	Low	Clear	6	1	2025	12	06	New York	NY	USA	22	-5	40	20	55	29.5	1008	20	100	0.0	8:03	15:57	19:40	5:10	Low	Clear
7	1	2025	12	07	New York	NY	USA	20	-6	35	22	64	29.4	1007	22	100	0.0	8:14	15:46	19:51	4:59	Low	Clear	7	1	2025	12	07	New York	NY	USA	20	-6	35	22	64	29.4	1007	22	100	0.0	8:14	15:46	19:51	4:59	Low	Clear
8	1	2025	12	08	New York	NY	USA	18	-7	30	24	73	29.3	1006	24	100	0.0	8:25	15:35	20:02	4:48	Low	Clear	8	1	2025	12	08	New York	NY	USA	18	-7	30	24	73	29.3	1006	24	100	0.0	8:25	15:35	20:02	4:48	Low	Clear
9	1	2025	12	09	New York	NY	USA	16	-8	25	26	82	29.2	1005	26	100	0.0	8:36	15:24	20:13	4:37	Low	Clear	9	1	2025	12	09	New York	NY	USA	16	-8	25	26	82	29.2	1005	26	100	0.0	8:36	15:24	20:13	4:37	Low	Clear
10	1	2025	12	10	New York	NY	USA	14	-8	20	28	91	29.1	1004	28	100	0.0	8:47	15:13	20:24	4:26	Low	Clear	10	1	2025	12	10	New York	NY	USA	14	-8	20	28	91	29.1	1004	28	100	0.0	8:47	15:13	20:24	4:26	Low	Clear
11	1	2025	12	11	New York	NY	USA	12	-9	15	30	100	29.0	1003	30	100	0.0	8:58	15:02	20:35	4:15	Low	Clear	11	1	2025	12	11	New York	NY	USA	12	-9	15	30	100	29.0	1003	30	100	0.0	8:58	15:02	20:35	4:15	Low	Clear
12	1	2025	12	12	New York	NY	USA	10	-11	10	32	110	28.9	1002	32	100	0.0	9:09	14:51	20:46	4:04	Low	Clear	12	1	2025	12	12	New York	NY	USA	10	-11	10	32	110	28.9	1002	32	100	0.0	9:09	14:51	20:46	4:04	Low	Clear
13	1	2025	12	13	New York	NY	USA	8	-12	5	34	120	28.8	1001	34	100	0.0	9:20	14:40	20:57	3:53	Low	Clear	13	1	2025	12	13	New York	NY	USA	8	-12	5	34	120	28.8	1001	34	100	0.0	9:20	14:40	20:57	3:53	Low	Clear
14	1	2025	12	14	New York	NY	USA	6	-13	0	36	130	28.7	1000	36	100	0.0	9:31	14:29	21:08	3:42	Low	Clear	14	1	2025	12	14	New York	NY	USA	6	-13	0	36	130	28.7	1000	36	100	0.0	9:31	14:29	21:08	3:42	Low	Clear
15	1	2025	12	15	New York	NY	USA	4	-15	-5	38	140	28.6	999	38	100	0.0	9:42	14:18	21:19	3:31	Low	Clear	15	1	2025	12	15	New York	NY	USA	4	-15	-5	38	140	28.6	999	38	100	0.0	9:42	14:18	21:19	3:31	Low	Clear
16	1	2025	12	16	New York	NY	USA	2	-16	-10	40	150	28.5	998	40	100	0.0	9:53	14:07	21:30	3:20	Low	Clear	16	1	2025	12	16	New York	NY	USA	2	-16	-10	40	150	28.5	998	40	100	0.0	9:53	14:07	21:30	3:20	Low	Clear
17	1	2025	12	17	New York	NY	USA	0	-17	-15	42	160	28.4	997	42	100	0.0	10:04	13:56	21:41	3:09	Low	Clear	17	1	2025	12	17	New York	NY	USA	0	-17	-15	42	160	28.4	997	42	100	0.0	10:04	13:56	21:41	3:09	Low	Clear
18	1	2025	12	18	New York	NY	USA	-2	-18	-20	44	170	28.3	996	44	100	0.0	10:15	13:45	21:52	2:58	Low	Clear	18	1	2025	12	18	New York	NY	USA	-2	-18	-20	44	170	28.3	996	44	100	0.0	10:15	13:45	21:52	2:58	Low	Clear
19	1	2025	12	19	New York	NY	USA	-4	-19	-25	46	180	28.2	995	46	100	0.0	10:26	13:34	22:03	2:47	Low	Clear	19	1	2025	12	19	New York	NY	USA	-4	-19	-25	46	180	28.2	995	46	100	0.0	10:26	13:34	22:03	2:47	Low	Clear
20	1	2025	12	20	New York	NY	USA	-6	-19	-30	48	190	28.1	994	48	100	0.0	10:37	13:23	22:14	2:36	Low	Clear	20	1	2025	12	20	New York	NY	USA	-6	-19	-30	48	190	28.1	994	48	100	0.0	10:37	13:23	22:14	2:36	Low	Clear
21	1	2025	12	21	New York	NY	USA	-8	-20	-35	50	200	28.0	993	50	100	0.0	10:48	13:12	22:25	2:25	Low	Clear	21	1	2025	12	21	New York	NY	USA	-8	-20	-35	50	200	28.0	993	50	100	0.0	10:48	13:12	22:25	2:25	Low	Clear
22	1	2025	12	22	New York	NY	USA	-10	-22	-40	52	210	27.9	992	52	100	0.0	10:59	13:01	22:36	2:14	Low	Clear	22	1	2025	12	22	New York	NY	USA	-10	-22	-40	52	210	27.9	992	52	100	0.0	10:59	13:01	22:36	2:14	Low	Clear
23	1	2025	12	23	New York	NY	USA	-12	-22	-45	54	220	27.8	991	54	100	0.0	11:10	12:50	22:47	2:03	Low	Clear	23	1	2025	12	23	New York	NY	USA	-12	-22	-45	54	220	27.8	991	54	100	0.0	11:10	12:50	22:47	2:03	Low	Clear
24	1	2025	12	24	New York	NY	USA	-14	-22	-50	56	230	27.7	990	56	100	0.0	11:21	12:39	22:58	1:52	Low	Clear	24	1	2025	12	24	New York	NY	USA	-14	-22	-50	56	230	27.7	990	56	100	0.0	11:21	12:39	22:58	1:52	Low	Clear
25	1	2025	12	25	New York	NY	USA	-16	-23	-55	58	240	27.6	989	58	100	0.0	11:32	12:28	23:09	1:41	Low	Clear	25	1	2025	12	25	New York	NY	USA	-16	-23	-55	58	240	27.6	989	58	100	0.0	11:32	12:28	23:09	1:41	Low	Clear
26	1	2025	12	26	New York	NY	USA	-18	-23	-60	60	250	27.5	988	60	100	0.0	11:43	12:17	23:20	1:30	Low	Clear	26	1	2025	12	26	New York	NY	USA	-18	-23	-60	60	250	27.5	988	60	100	0.0	11:43	12:17	23:20	1:30	Low	Clear
27	1	2025	12	27	New York	NY	USA	-20	-23	-65	62	260	27.4	987	62	100	0.0	11:54	12:06	23:31	1:19	Low	Clear	27	1	2025	12	27	New York	NY	USA	-20	-23	-65	62	260	27.4	987	62	100	0.0	11:54	12:06	23:31	1:19	Low	Clear
28	1	2025	12	28	New York	NY	USA	-22	-24	-70	64	270	27.3	986	64	100	0.0	12:05	11:55	23:42	1:08	Low	Clear	28	1	2025	12	28	New York	NY	USA	-22	-24	-70	64	270	27.3	986	64	100	0.0	12:05	11:55	23:42	1:08	Low	Clear
29	1	2025	12	29	New York	NY	USA	-24	-24	-75	66	280	27.2	985	66	100	0.0	12:16	11:44	23:53	0:57	Low	Clear	29	1	2025	12	29	New York	NY	USA	-24	-24	-75	66	280	27.2	985	66	100	0.0	12:16	11:44	23:53	0:57	Low	Clear
30	1	2025	12	30	New York	NY	USA	-26	-24	-80	68	290	27.1	984	68	100	0.0	12:27	11:33	24:04	0:46	Low	Clear	30	1	2025	12	30	New York	NY	USA	-26	-24	-80	68	290	27.1	984	68	100	0.0	12:27	11:33	24:04	0:46	Low	Clear
31	1	2025	12	31	New York	NY	USA	-28	-24	-85	70	300	27.0	983	70	100	0.0	12:38	11:22	24:15	0:35	Low	Clear	31	1	2025	12	31	New York	NY	USA	-28	-24	-85	70	300	27.0	983	70	100	0.0	12:38	11:22	24:15	0:35	Low	Clear
32	2	2026	1	01	New York	NY	USA	-30	-25	-90	72	310	26.9	982	72	100	0.0	12:49	11:11	24:26	0:24	Low	Clear	32	2	2026	1	01	New York	NY	USA	-30	-25	-90	72	310	26.9	982	72	100	0.0	12:49	11:11	24:26	0:24	Low	Clear
33	2	2026	1	02	New York	NY	USA	-32	-25	-95	74	320	26.8	981	74	100	0.0	13:00	11:00	24:37	0:13	Low	Clear	33	2	2026	1	02	New York	NY	USA	-32	-25	-95	74	320											

Level





# Appendix D

Supporting Transportation Information

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# Technical Memorandum

September 15, 2022

<b>To</b>	Craig Schlatter, City of Ukiah	<b>Contact No.</b>	(707) 463-6219
<b>Copy to</b>	Jim Harnish, Mintier Harnish	<b>Email</b>	cschlatter@cityofukiah.com
<b>From</b>	Don Hubbard, TE, AICP	<b>Project No.</b>	11196303
<b>Project Name</b>	City of Ukiah General Plan Update		
<b>Subject</b>	SB-743 Methodology		

## 1. Introduction

This memorandum describes the proposed methodology for assessing transportation impacts in Ukiah consistent with SB-743 and current CEQA Guidelines. SB-743 addresses a range of topics and aims to better promote statewide policies that (a) combat climate change by reducing greenhouse gas emissions and particulates; (b) encourage infill development and a diversity of uses instead of sprawl; and (c) promote multi-modal transportation networks, providing clean, efficient access to destinations and improving public health through active transportation. As part of implementing SB 743, revisions to CEQA Section 15064.3 that describes specific considerations for evaluating a project's transportation impacts went into effect statewide on July 1, 2020.

CEQA gives lead agencies broad discretion over analytical methodologies. CEQA Guidelines §15064.3(b)(4), which is new with SB-743, reads:

*"Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section."*

No particular methodology or metric is mandated; the choice is left to the lead agency. In making this choice, an agency should bear in mind what sort of criteria the legislature had in mind for determining the significance of transportation impacts goals of SB-743. These were expressed in PRC §21099(b)(1), *"Those criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses."*

The methodology described in this memo is based on the one developed for the Sacramento Blueprint Project, the groundbreaking study of how smart growth policies could lead to reductions in vehicle-miles traveled (VMT). The Blueprint Project represented a sea change in how transportation impacts were analyzed, because it demonstrated that conventional travel demand models have inherent blind spots that make them insensitive to the effects of residential and employment density, neighborhood design, and a diversity of land uses in close proximity to one another (the 3 D's). It went a step further and developed procedures external to a traffic model to forecast the effects of the 3 Ds on travel behavior. This work won a host of awards including US-EPA's National Award for Smart Growth Achievement, FHWA's Transportation Planning Excellence Award, the American Institute of Architects' Presidential Citation, and AMPO's National Award for Outstanding Achievement in Metropolitan Transportation Planning.

## 2. Description of the Methodology

The methodology consists of determining the land use characteristics of each neighborhood and then assessing the potential for interacting with complementary land uses through non-auto trips. Data shows that when housing is in close proximity to retail and services uses people will walk or bike to those uses at least some of the time, and even if they drive the trips will be short (i.e. low VMT trips). Similarly, the likelihood of people walking or biking to work, rather than driving, depends on the distance between their homes and workplaces. So measures of proximity are also measures of the potential for VMT reduction.

The steps in the methodology are shown in Figure 1. These are:

### ***Inputting Land Use Data***

- 1) The study area, the city of Ukiah and its vicinity, were divided into hexagons. The size of the hexagons was based on survey data of typical distances for walking trips by Americans. The idea being that land uses in a given hexagon would be within comfortable walking distance of complementary land uses in the six adjacent hexagons.
- 2) The existing land uses in each hexagon were then grouped into three categories as follows:
  - Residential, measured in households
  - Retail, measured in jobs. This category includes services such as banking and beauty salons that typically attract more trips by customers than commute trips by employees
  - Non-retail, also measured in jobs. This includes office, industrial, and agricultural jobs where the majority of trips are made by employees rather than customers.

Figure 2, Figure 3, and Figure 4 show the existing distribution of households, retail jobs, and non-retail jobs in Ukiah, respectively.

### ***Computing Diversity Indicators***

- 3) The land uses in each hexagon are then combined with the land uses in the six adjacent hexes to represent the diversity of land uses available within walking distance to people in the hexagon.
- 4) The potential for interaction with complementary land uses was then estimated using three diversity indices, each representing a different type of transaction:
  - Jobs/Housing Diversity, which represents a person's ability to walk to their place of employment. In traffic forecasting this type of trip is termed a home-based work (HBW) trip.
  - Retail/Housing Diversity, which represents a person's ability to walk for shopping trips. In traffic forecasting this type of trip is termed a home-based other (HBO) trip.
  - Job/Mix Diversity, which represents the interaction between retail and non-retail uses. For example, office workers walking to nearby restaurants or coffee shops. In traffic forecasting this type of trip is termed a non-home-based work (NHB) trip.

The formulas for these indices are as follows:

$$\text{Jobs/Housing Diversity} = 1 - [(b \cdot \text{HHs} - \text{EMP}) / (b \cdot \text{HHs} + \text{EMP})]$$

$$\text{Jobmix Diversity} = 1 - [(c \cdot \text{REMP} - \text{NEMP}) / (c \cdot \text{REMP} + \text{NEMP})]$$

$$\text{Retail/Housing Diversity} = 1 - [(b \cdot \text{HHs} - \text{REMP}) / (b \cdot \text{HHs} + \text{REMP})]$$

Where:

HH = Number of households

REMP = Number of Retail and Service Jobs

NEMP = Number of Non-Retail Jobs

EMP = Total number of jobs (i.e. REMP + NEMP)

b = total regional employment / total regional households

c = total regional non-retail jobs / total regional retail jobs

d = total regional retail/service employment / total regional households

These formulas produce scores for individual hexagons that range from -1 to 1, with a score of 0 indicating an ideal mix of land uses and scores of -1 and 1 indicating that only one of the land uses is present.

The ideal mix of land uses, found in the formulas as “a”, “b”, and “c”, was determined from the county-wide mix of the three land uses types. The rationale for this is the fact that land uses tend to balance when viewed over a large area. For example, government jobs may be concentrated in one area and industrial jobs in another, while residences and shops are distributed among various other communities, but when taken as a whole the housing, retail, and non-retail uses in a region tend to occur in the correct proportions for that particular type of region.

- 5) The scores for the three types of diversity were then mapped out. These maps can be used by City staff to identify which parts of the city have a good balance of land uses and which might benefit from zoning that would promote a better mixing of land uses.

### **Computing City-Wide Score**

- 6) For some purposes, such as evaluating general plan alternatives, it is useful to be able to compute a combined diversity score for the study area as a whole. The first step in doing this is to convert the diversity scores from the -1 to 1 range used in the scores for individual hexagons into their absolute values, with 0 again indicating a perfect mix of uses and 1 indicating no mix at all (i.e. a single land use type). If this were not done, then the scores of, say, over-retailed and under-retailed neighborhoods in different parts of the city would cancel each other out, when in fact both have a poor land use balance.
- 7) The three types of diversity are not equally important for every hexagon because the number of HBW, HBO, and NHB trips depends on the land uses in the hex. The table below shows the number of trips of each type generated by each of the three land use categories:

Trip Purpose	Trip Generation Rate		
	Household	Retail Job	Non-Retail Job
Home-Based Work	2.2	1.2	1.7
Non-Home-Based	1.0	8.1	1.9
Home-Based Other	5.9	8.2	0.8
Total	9.0	17.5	4.4

- 8) The land uses for each hex are then multiplied by the trip generation rates and used to compute the percentage of total trips in each trip category. Figure 5 shows the total trips generated by hex zone.
- 9) The three individual scores for each hexagon are then combined into an individual score for each hexagon using the trip types as weighting.
- 10) The scores for the individual hexagons are then combined using the number of trips generated by the hex to weight their contribution to the city-wide score. Note that this means that the inclusion of vacant hexagons outside of the city will have no effect on the outcome; they generate no trips and so their scores will be weighted at zero.

### 3. Results

Figure 6, Figure 7, and Figure 8 show the three diversity scores for existing land uses. Figure 9 shows the total diversity by zone for existing land uses. These figures show several things:

- Much of the city core scores quite well, between -0.30 and 0.30, on jobs/housing diversity (see Figure 6). This indicates the success that Ukiah has achieved in enabling people to live and work in close proximity.
- The edges of the city do not score as well on jobs/housing diversity (see Figure 6). However, this does not hurt the city's overall score as much as Figure 6 might imply, because there are relatively few jobs and residences in those areas. This is indicated by the small size of the circles in the hexagons in Figure 6.
- The city as a whole is over-retailed in relation to its population, due to the fact that it serves as the main retail destination for a large surrounding area (see Figure 7). This has implications both for sales tax revenues (good) and VMT (bad).
- Figure 8 shows that, with the exception of the city core (the light-colored hexagons), retail and non-retail jobs tend to be concentrated in different parts of the city (the red and blue hexagons in the figure). This limits their potential for interaction that does not involve driving.

### 4. Advantages of the Methodology

This methodology offers a number of practical advantages:

- a) **Ease of Use:** It does not require expensive software and special training to use, as is the case with most traffic models. City staff can evaluate projects using the Excel program already found on their computers.
- b) **Nuanced, Informative Results:** Unlike other methodologies, whose output is a just a number saying the VMT is high or low, this methodology provides a clear indication of the underlying causes of high or low auto use. For example, it might show the analyst that a proposed housing project is in a location that lacks local shopping opportunities and might be improved with the addition of locally-serving retail.
- c) **Appropriate Scale:** While this methodology cannot substitute for a convention traffic model for forecasting over large geographic areas (entire counties), it is likely to provide a more accurate representation of travel behavior in a small town than is possible with a conventional model. This is because traffic models incorporate certain necessary simplifications, such as centroid connectors and frictionless intersections, that are inconsequential when forecasting long trips but are highly distorting when forecasting trip-making over small areas. With a total area of less than 5 square miles, Ukiah is the sort of compact, walkable city better suited to a proximity-based model than a trip-based model.

### 5. Thresholds

CEQA analyses performed under SB-743 require the use of thresholds, as was the case for the LOS-based analyses they replaced. We recommend that the City establish three types of thresholds, namely:

- 1) **Thresholds for Screening by Size:** CEQA offers categorical exemptions for very small projects from having to do EIRs, both because of the negligible impact they are likely to have and because the expense of performing an EIR might make small projects unviable. We recommend that the City use the Class 1, for small expansions of existing uses, and Class 3, for new small projects, exactly as they are written in CEQA Guidelines §15301 and §15303. Some jurisdictions are experimenting with converting the thresholds in the CEQA guidelines, which as measure in square

feet, into some sort of equivalent in vehicle trips per day. We do not recommend this, because it involves a series of assumptions that may prove difficult to defend and in any case offers no significant advantages for Ukiah over the sections as written.

- 2) **Thresholds for Land Development Projects:** The methodology described in this memo is intended for use in analyzing land use projects. As with other aspects of SB-743, there is a lot of uncertainty regarding how the thresholds should be set. OPR's Technical Advisory suggested using a threshold requiring a 15% reduction in VMT over existing conditions. The 15% number originated in CARB's *California's 2017 Climate Change Scoping Plan*, where it was computed as the average reduction needed to achieve the State's GHG reduction goals. However, this state-wide average may not be appropriate for all jurisdictions, and CARB has more recently set higher targets in some MPO areas and lower targets in others. For example, CARB's latest plan calls for a 19% reduction in VMT for the four largest MPOs<sup>1</sup> down to less than 10% for some of the smaller MPOs. Since Ukiah is not in an MPO region, we suggest using the targets for Shasta RTA, since it is both the geographically closest MPO and demographically most similar MPO to Ukiah. CARB set the target for Shasta RTA at a 4% reduction in average per-capita VMT.
- 3) **Thresholds for Transportation Projects:** As stated earlier, it is the intent of SB-743 that lead agencies use, criteria that "... shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (PRC §21099(b)(1)). We recommend setting a threshold that explicitly focuses on balancing transportation modes within the city. An example would be:

*"A project's impacts shall be deemed significant if it results in a percentage increase in road capacity higher than the percentage increase in bicycle or multi-use capacity."*

Note that this threshold would make all active transportation projects presumptively less-than-significant. It would not preclude the City from undertaking road expansion projects, but it would mean that such projects would need to include expansion of the bicycle facility system as well. As written, it would require a 1%-to-1% expansion of the two systems, but it could easily be tweaked to require a 1%-to-2% or 3% expansion of bike facilities to help that system catch up with the facilities offered to cars.

## 6. Using the Methodology for Individual Projects

To use this methodology for an individual land use project is similar to that used for evaluating the General Plan, except that instead of computing a score for the entire city, you would only compute the score for the hex where the proposed project will be constructed. This score will reflect the proposed project's interactions with all the other land uses<sup>2</sup> within typical walking distances. The idea is to see whether or not the project moves the neighborhood it is in towards the "Goldilocks" spot where the three main types of land uses are in perfect balance.

The Goldilocks framing is best illustrated with a hypothetical example of a developer proposing to build a residential project in a hexagon that, with its neighboring six hexagons, currently has 500 dwelling units, 500 retail jobs, and 500 non-retail jobs. The developer would like to build 2,000 additional dwelling units, but their EIR will include a reduced-impact alternative with only 500 additional dwelling units.

City staff would note the diversity indices for existing conditions, then add 2,000 households and note the results. They would repeat the procedure for 500 households. When they tabulate the results, they would get a table like the one shown below.

---

<sup>1</sup> SCAG, MTC, SANDAG, and SACOG

<sup>2</sup> This should include both existing and already-approved land uses



Project Alternative	Jobs/ Housing Diversity	Jobmix Diversity	Retail/ Housing Diversity	Total Diversity Score	% Improvement in Diversity
Existing City Average	0.27	0.24	0.35	0.30	
Existing Project Hexagon	-0.32	0.33	-0.49	0.40	
+500 DUs	0.02	0.33	-0.18	0.20	51%
+2,000 DUs	0.44	0.33	0.27	0.32	22%

The right-most column in the table shows that this project would improve the land use balance in the neighborhood, and that the reduced-impact alternative would be superior to the developer's preference in terms of land use diversity. The analyst could stop there, and conclude that under either alternative the project would have less-than-significant impacts on the area. However, if they took the analysis one step further and input a range of project sizes into the spreadsheet, they could get a more nuanced feel of the interactions at work in this location.

Figure 10 shows the Jobs/Housing diversity for different numbers of households, given that 500 retail and 500 non-retail jobs are within walking distance. The black dot shows existing conditions. With 500 households, this area has fewer DUs than would be optimal for this amount of employment. However, the reduced-impact alternative (blue dot) would result in a nearly ideal mix of jobs and households. The developer's preferred alternative of adding 2,000 DUs (red dot) would over-shoot the ideal; the area would go from having too few DUs to having too many for the number of jobs nearby.

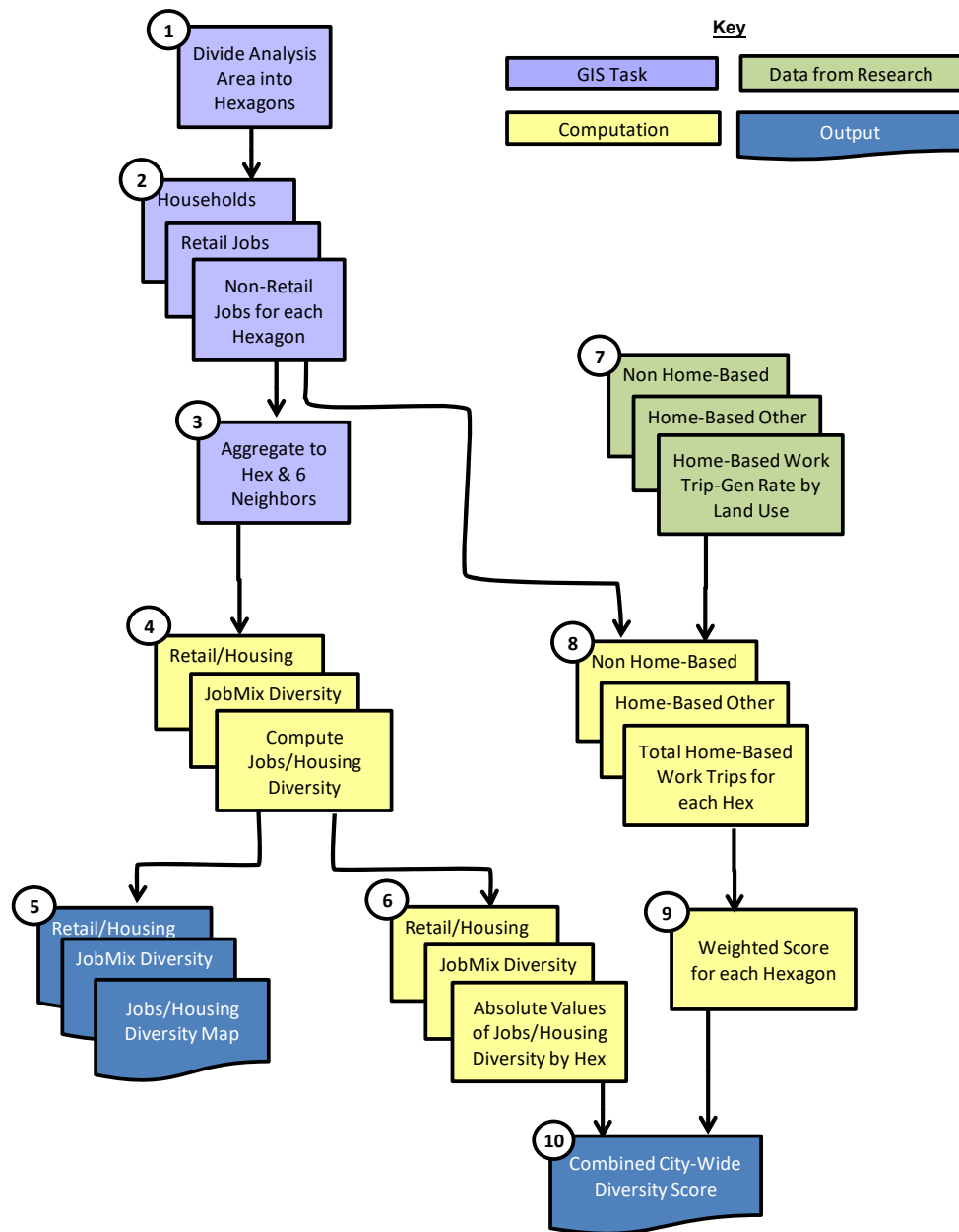
Figure 11 repeats the range analysis, but this time for Retail/Housing Diversity. The black dot shows that the area is over-retailed in proportion to the number of nearby homes. The blue dot shows that the reduced impact alternative pushes the balance in the right direction, but the area would remain over-retailed. The red dot shows that the area would go from having too little retail for the area it serves to having too little. Nevertheless, it would be closer to the ideal mix than existing conditions.

Figure 12 completes the analysis by showing the combined score for a range of project sizes. The shape changes because the combined score uses absolute values, with zero indicating a perfect mix. The most interesting thing about this figure is that it shows that the Goldilocks project size would be about 900 additional DUs (so 1,400 DUs in total if you include the existing 500). This would result in the optimal amount of residential development for an area with 500 retail and 500 non-retail jobs.

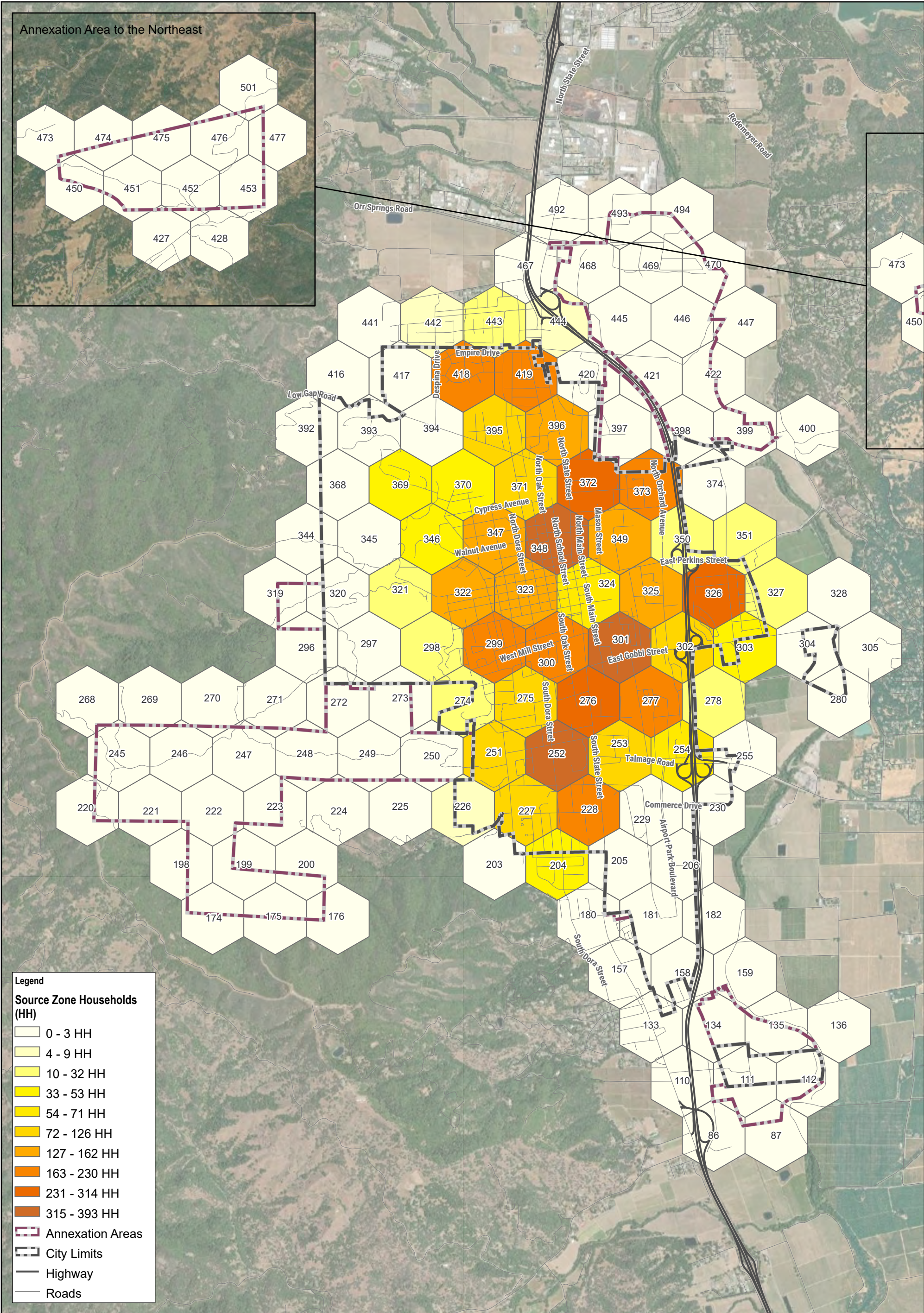
Someone may wonder why the score in Figure 12 does not go down to zero for the optimal residential amount. The reason is that the interaction between the retail and non-retail jobs, the JobMix Diversity, is not affected by the number of households nearby. Since the proportions of retail and non-retail jobs is in this case not ideal, an ideal score cannot be achieved in this location; at least not without tinkering with the amount of employment.

This example illustrates the key advantages of this methodology. In just an hour or two, using just a spreadsheet, a City staff person could evaluate a proposed project's effects on land use balance and opportunities for non-auto trips, and thus its effects on VMT. The analysis would not only reveal how the project would alter the land use balance but also points towards ways to optimize the project.

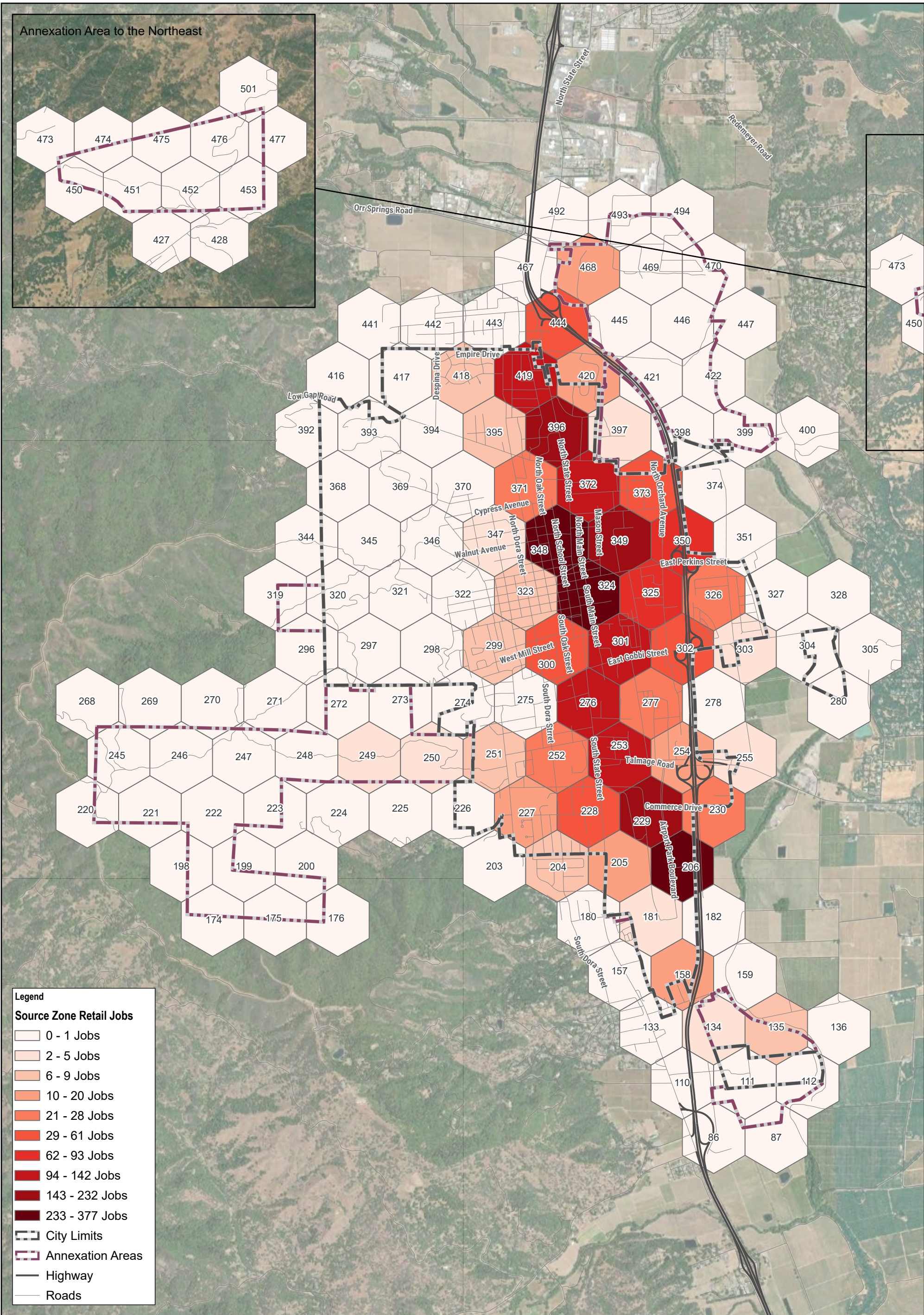
**Figure 1: Methodology Flowchart**



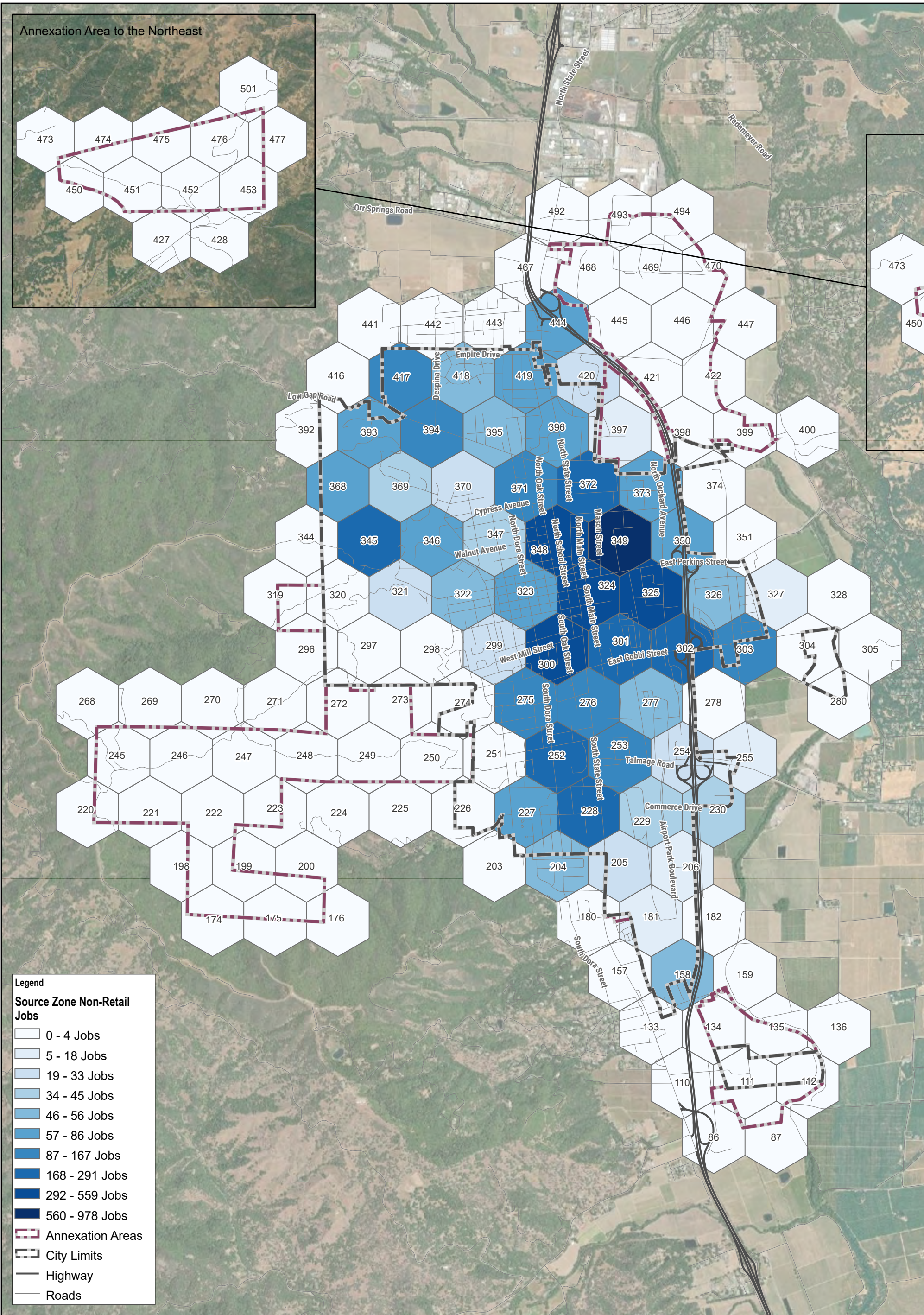












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US Feet

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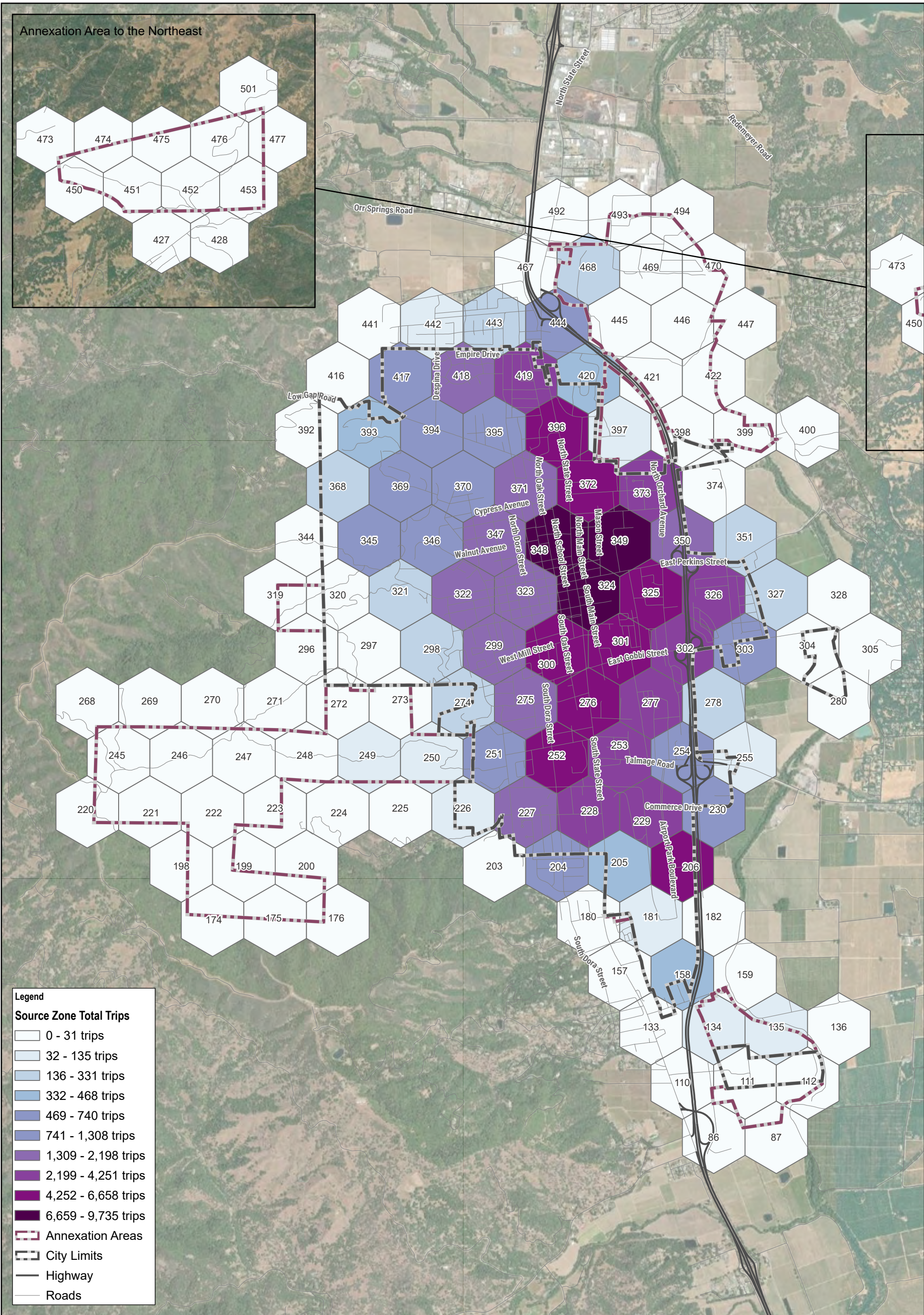
CITY OF UKIAH  
GENERAL PLAN UPDATE 2040

**NON-RETAIL JOBS  
(EXISTING)**

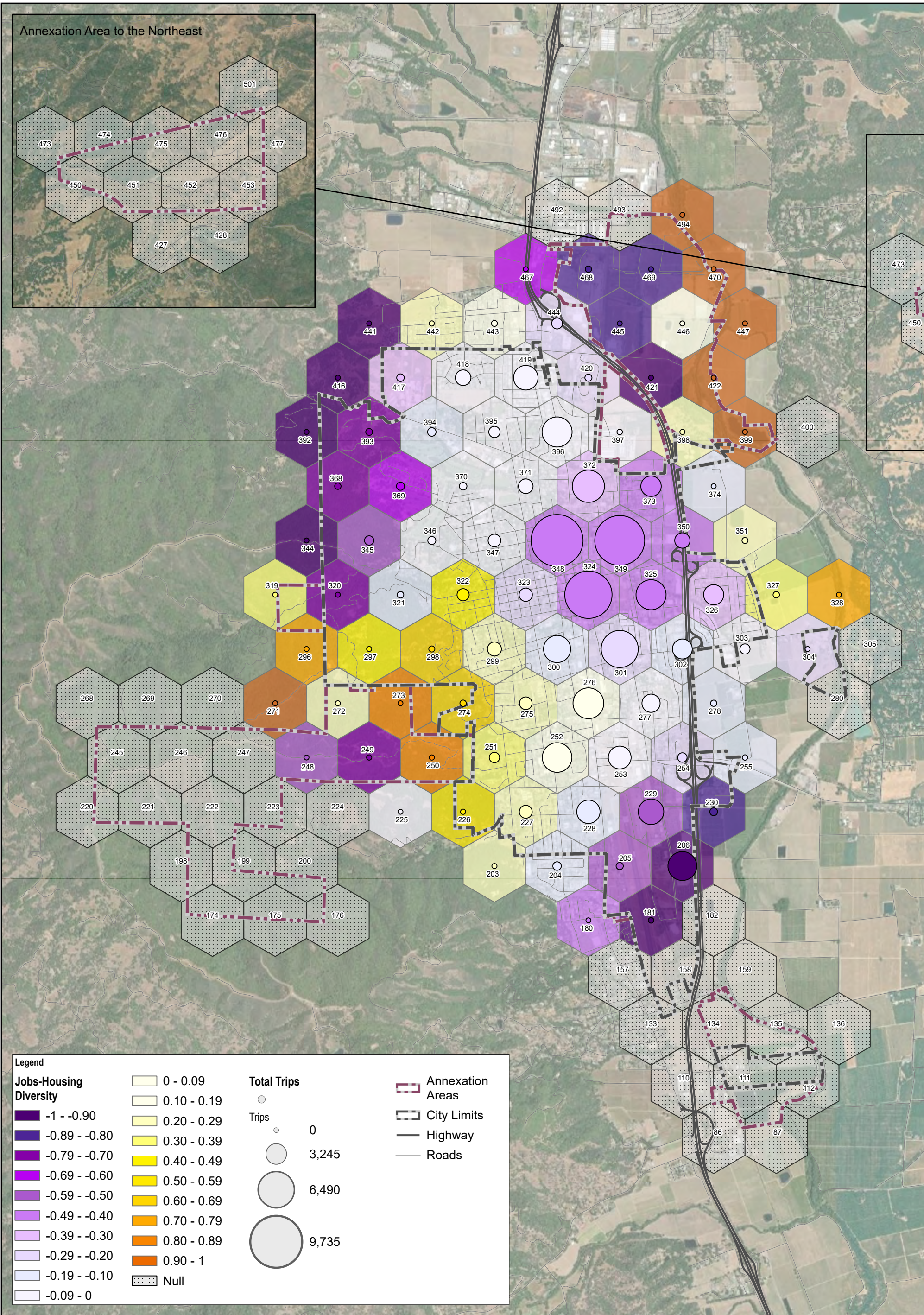
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Revision No. -  
Date 09/01/2022

**FIGURE 4**

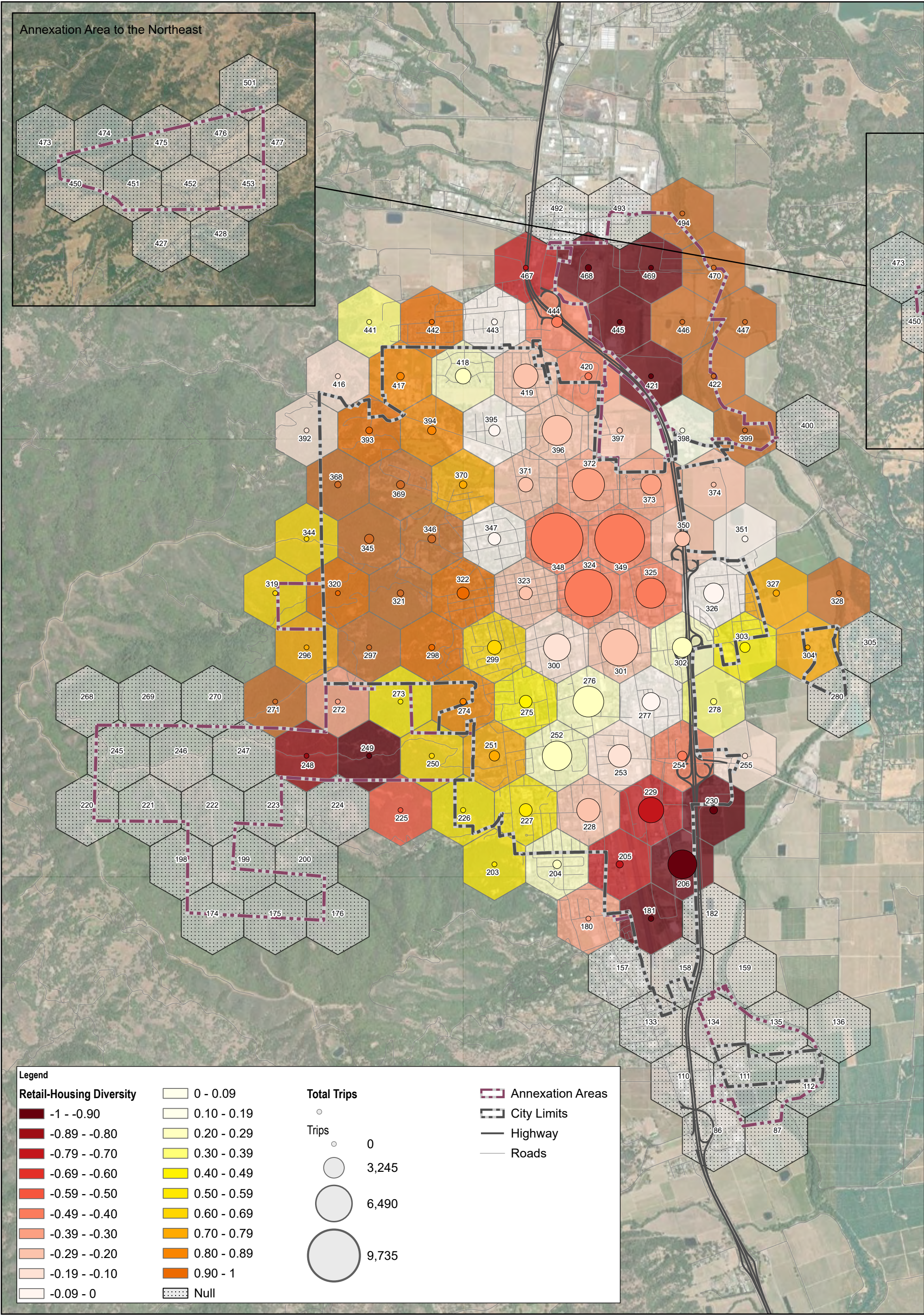












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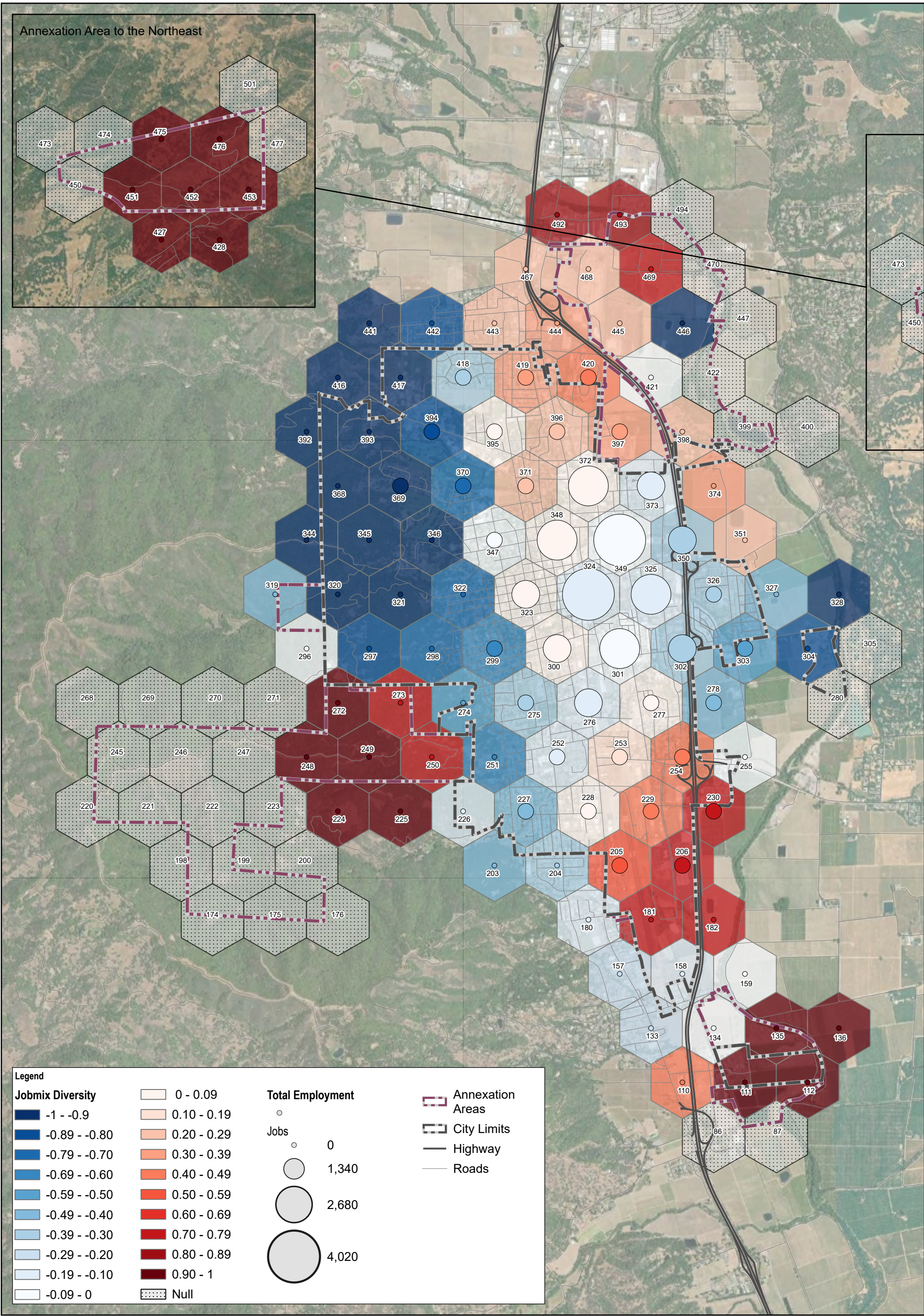


CITY OF UKIAH  
GENERAL PLAN UPDATE 2040  
RETAIL/HOUSING DIVERSITY &  
TOTAL TRIPS BY HEX ZONE  
(EXISTING)

Project No. 11196303  
Revision No. -  
Date 09/12/2022

FIGURE 7





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US Feet

Map Projection: Lambert Conformal Conic  
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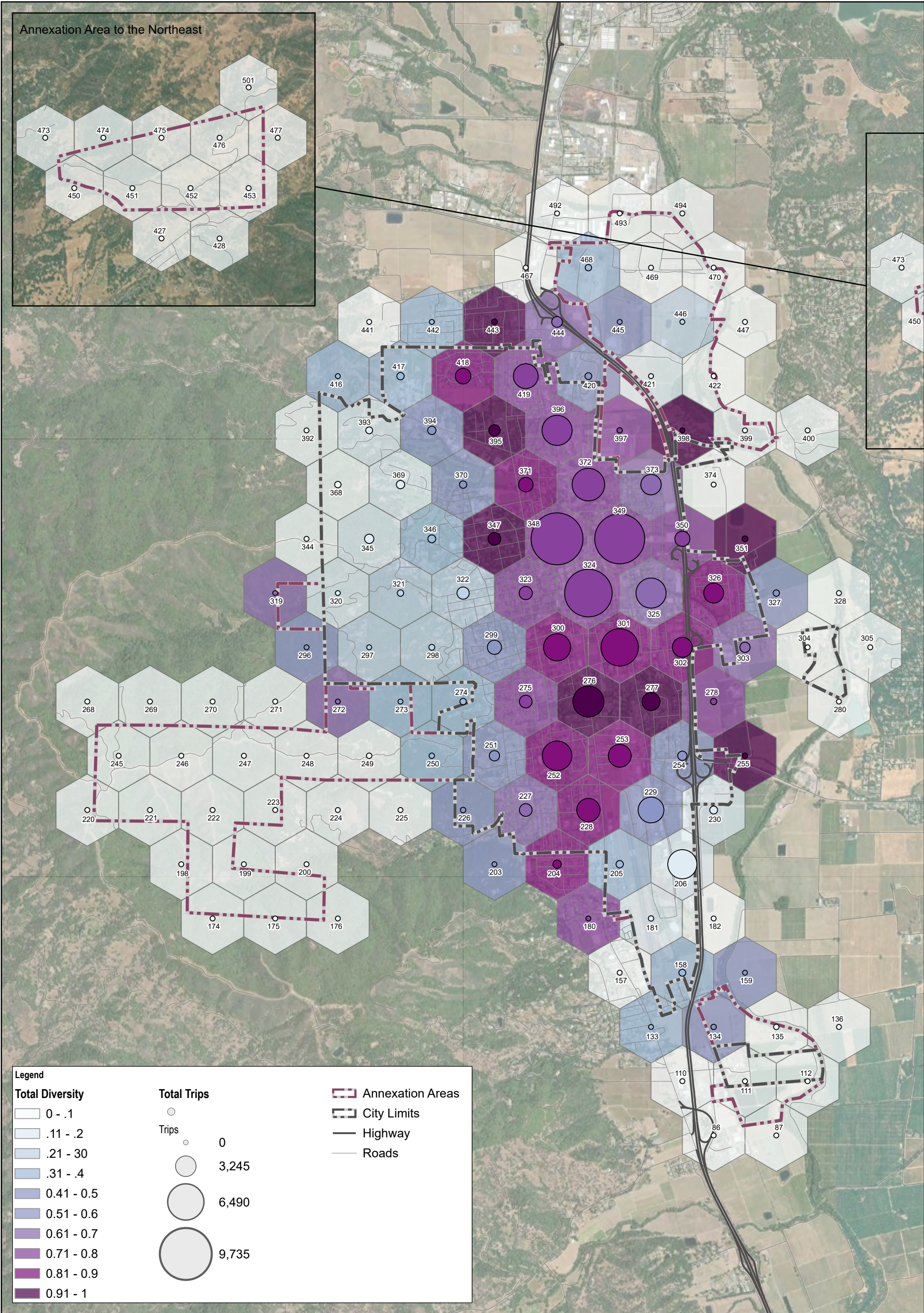
CITY OF UKIAH  
GENERAL PLAN UPDATE 2040

**JOBMIX DIVERSITY &  
TOTAL EMPLOYMENT  
BY HEX ZONE (EXISTING)**

Project No. 11196303  
Revision No. -  
Date 09/12/2022

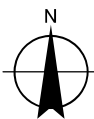
**FIGURE 8**





Paper Size ANSI B  
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Map Projection: Lambert Conformal Conic  
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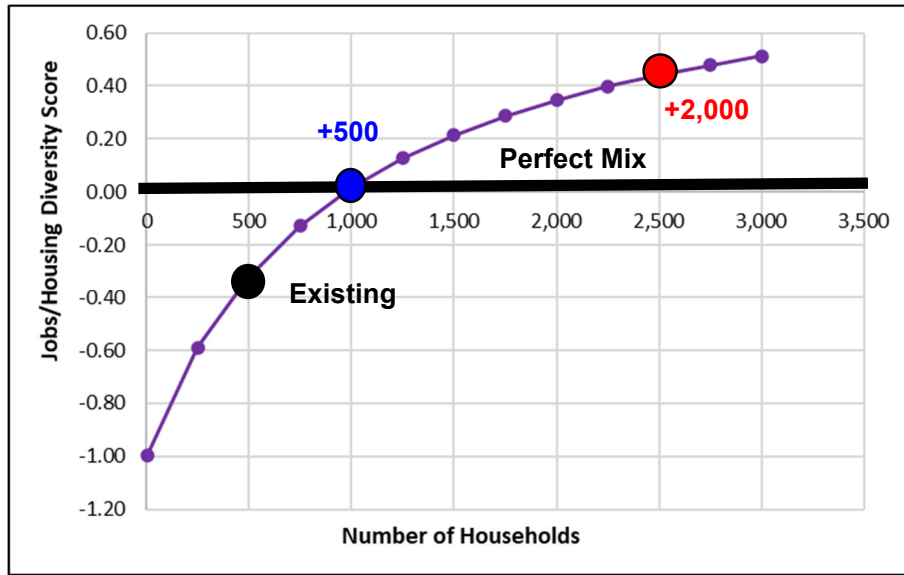
**CITY OF UKIAH**  
**GENERAL PLAN UPDATE 2040**  
**TOTAL DIVERSITY & TOTAL**  
**TRIPS BY HEX ZONE**  
**(EXISTING)**

Project No. 11196303  
Revision No. -  
Date 09/12/2022

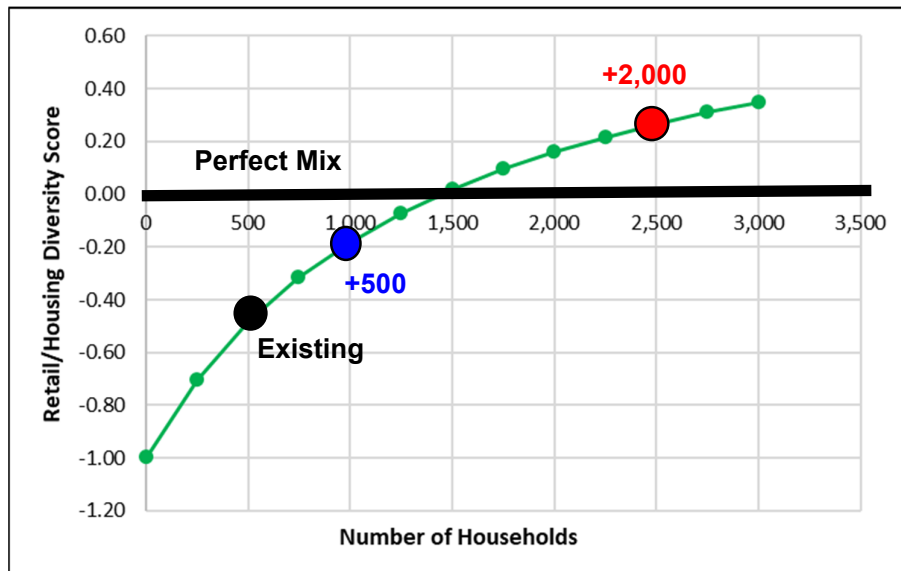
**FIGURE 9**



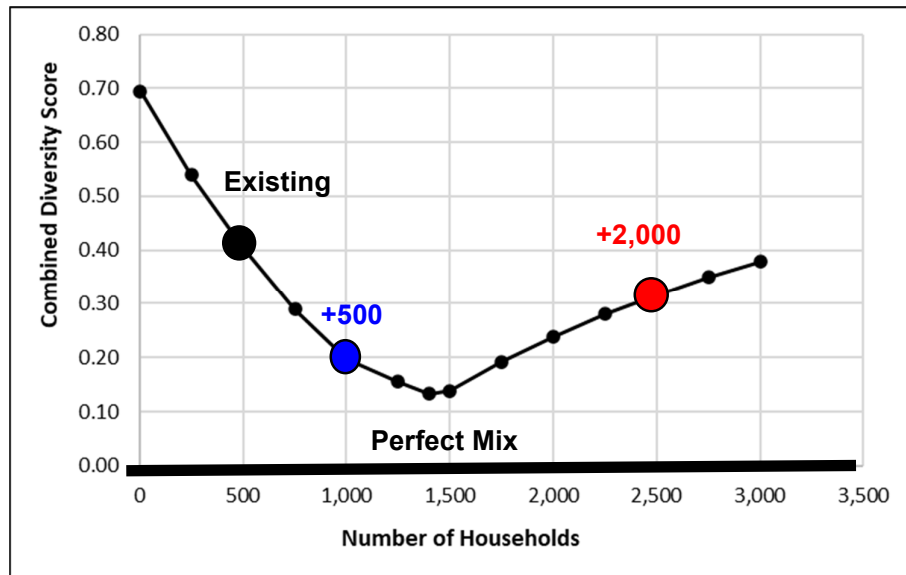
**Figure 10: Jobs/Housing Diversity for Hypothetical Project**



**Figure 11: Retail/Housing Diversity for Hypothetical Project**



**Figure 12 : Jobs/Retail Diversity for Hypothetical Project**



# Technical Memorandum

October 3, 2022

<b>To</b>	Craig Schlatter, City of Ukiah	<b>Contact No.</b>	(707) 463-6219
<b>Copy to</b>	Jim Harnish, Mintier Harnish	<b>Email</b>	cschlatter@cityofukiah.com
<b>From</b>	Colin Burgett	<b>Project No.</b>	11196303
<b>Project Name</b>	City of Ukiah General Plan Update		
<b>Subject</b>	SB-743 Methodology		

This memorandum augments the prior memorandum provided by GHD (dated September 15, 2022) concerning the proposed SB-743 methodology with the following additional information relevant to upcoming discussions concerning the proposed SB-743 methodology:

- Comparison of the citywide land use diversity score with the regional rate for Mendocino County;
- Screening threshold recommendations by type of project; and
- Example application of the proposed diversity index methodology to hypothetical projects on the edges of Ukiah.

## 1. Comparison with Countywide Land Use Diversity

Table 1 provides a comparison of the existing citywide and countywide land use diversity scores, based on the distribution and proximity of households, retail and non-retails. The diversity score ranges from 0.00 to 1.00, with lower scores (close to 0.00) representing diverse conditions, and higher scores (closer to 1.00) representing less diverse conditions.

As shown, under existing conditions, the Countywide diversity index is 0.50, while the City of Ukiah score is 0.30, indicating that the diversity of land uses in Ukiah that is superior to the Countywide average. This reflects the fact that a large portion of Ukiah residents live relatively close to work and/or local services, generating lower rates of vehicle miles traveled (VMT).

**Table 1: Land Use Diversity Score (City & County)**

Area	Existing Total Land Use Diversity Score
City of Ukiah	0.30
Mendocino County	0.50

Note: The diversity score ranges from 0.00 to 1.00, with lower scores (close to 0.00) representing diverse conditions, and higher scores (closer to 1.00) representing less diverse conditions.

## 2. Screening Recommendations

Local agencies may identify screening thresholds to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. The screening thresholds may be based on characteristics including project size, location, transit availability or provision of affordable housing, consistent with guidance provided by the Governor's Office of Planning and Research (OPR).

Table 2 summarizes recommended screening thresholds by project type. Taking into account the unique travel characteristics of Ukiah, all residential projects in Ukiah could be screened from further analysis as recommended below, because (1) residences located in Ukiah generate low rates of home-based VMT per Capita compared to the rest of Mendocino County (roughly half the Countywide average based on the Mendocino COG travel demand model) given greater proximity to jobs and services; and (2) Ukiah has a jobs/housing imbalance, with an excess of jobs relative to the number of households, that results in most Ukiah jobs being filled by non-resident commuters; therefore the provision of housing projects in Ukiah would increase the likelihood that that a larger portion of workers employed in Ukiah may also reside in Ukiah, thus reducing VMT given shorter commute lengths.

**Table 2: Screening Recommendations**

Type of Project	Recommended Screening Thresholds for City of Ukiah
Small Projects	Projects that meet the existing CEQA categorical exemptions: Class 1 exemption, for small expansions of existing uses, and Class 3, for new small projects, as specified in CEQA Guidelines §15301 and §15303
Residential Uses	Residential <sup>1</sup> projects.
Employment Uses <sup>2</sup> in Areas with a Diverse Mix of Land Uses	Proposed employment uses in zones with a total diversity score at least 4% better than the Countywide average.
Local-serving Retail	Neighborhood shopping centers <sup>3</sup> with a total gross leasable area of up to 125,000 square feet, with multiple tenants typically anchored by a supermarket or drugstore; and single tenant local-serving retail projects of 50,000 sq. ft. or less.
Projects in Proximity to Major Transit Stops	Projects within one-half (0.5) mile of a transit stop with 15 minute or less headways, unless the project has a Floor Area Ratio (FAR) of less than 0.75, reduces the supply of affordable housing, or includes more parking than required under the zoning code.
Transportation Projects	Roadway, transit, bicycle, and pedestrian projects that do not lead to a measurable increase in vehicle travel.

<sup>1</sup> All residential projects in Ukiah may be expected to result in less than significant transportation impacts relevant to VMT and SB-743, because (1) residences located in Ukiah generate low rates of home-based VMT per Capita compared to the rest of Mendocino County (roughly half the Countywide average based on the Mendocino COG travel demand model) given greater proximity to jobs and services; and (2) Ukiah has a jobs/housing imbalance, with an excess of jobs relative to the number of households that results in most Ukiah jobs being filled by non-resident commuters; therefore the provision of housing in Ukiah would increase the likelihood that that a larger portion of workers employed in Ukiah may also reside in Ukiah, thus reducing VMT given shorter commute lengths.

<sup>2</sup> The screening threshold for employment uses would be applicable to proposed commercial land uses in which most daily trips would be generated by employees (not customers), such as proposed office projects.

<sup>3</sup> Neighborhood shopping centers of up to 125,000 square feet as defined by the International Council of Shopping Centers (ICSC) U.S. Shopping Center Classification and Characteristics, provide 30,000 to 125,000 square feet of gross leasable area, typically anchored by a supermarket and/or large drugstore with a trade area of 3 miles or less.



### 3. Hypothetical Projects at Edge Locations

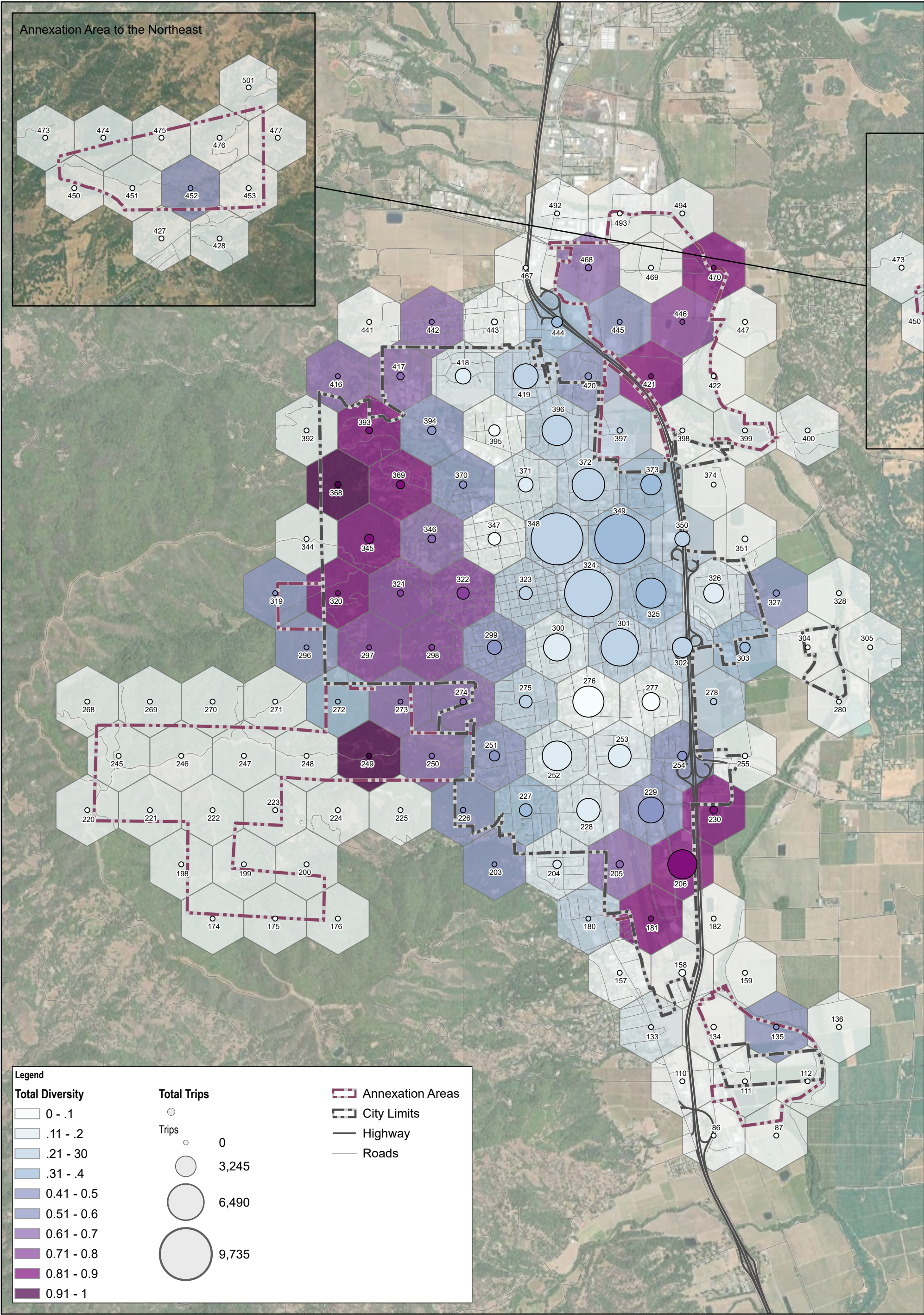
In response to questions about the likely impacts for potential projects at “edge locations” near the City limits, in areas that are currently undeveloped, several hypothetical projects were considered as examples for upcoming discussion. Table 3 summarizes the potential impact findings, based on the comparing the diversity score for the Project area (Hex Zone) with the Countywide average. The diversity score for individual Hex zones takes into account the land use diversity of adjacent Hex zones. The methodology for assessing interconnectivity between adjacent Hex zones may also be refined for Ukiah to further incorporate multi-modal characteristics and travel amenities. Figure 1 shows the Hex Zone locations.

**Table 3: Hypothetical Projects at Edge Locations**

No	Hypothetical Project	Location (Hex Zone)	Total Diversity Score for Project Zone		Potential Impact Finding based on Comparison with Countywide average <sup>4</sup>
			Existing	Existing plus Project	
1	Industrial near North edge of Ukiah	492	N/A (undeveloped)	0.23	Less than significant
2	Retail >150,000 sq ft near South edge of Ukiah	181	0.87	0.93	Significant requiring mitigation(s). For projects requiring mitigations: mitigation options specific to the City of Ukiah could be identified as this analysis methodology is refined further. Potential mitigations could include provision of multi-modal improvements (such as potential connections to a planned bicycle/pedestrian path along Airport Road that will connect the South edge of Ukiah with downtown).

<sup>4</sup> Project impacts would be considered less than significant if the total diversity score for the project zone under Existing plus Project conditions would be at least 4% lower than the Countywide average of 0.50





Paper Size ANSI B  
0 500 1,000 1,500 2,000  
US Feet

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



CITY OF UKIAH  
GENERAL PLAN UPDATE 2040  
HEX ZONE LOCATIONS

Project No. 11196303  
Revision No. -  
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FIGURE 1