



**CEQA Initial Study for:  
Great Redwood Trail – Ukiah (Phase 4)  
Mitigated Negative Declaration  
August 29, 2024**

**SCH No: XXXXXXXXXXX**

*Prepared by:*

City of Ukiah  
Community Development Department  
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## I. PROJECT INFORMATION

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<b>Project Title:</b> Great Redwood Trail – Ukiah (Phase 4)
<b>Lead Agency Address and Phone Number:</b> City of Ukiah Community Development Department 300 Seminary Avenue Ukiah, California 95482
<b>CEQA Contact Person and Phone Number:</b> Katherine Schaefers, Planning Manager City of Ukiah, Community Development Department (707) 463-6203 <a href="mailto:KSchaefers@cityofukiah.com">KSchaefers@cityofukiah.com</a>
<b>Applicant:</b> City of Ukiah
<b>Property Owner:</b> Great Redwood Trail Agency (GRTA)
<b>Project Location:</b> Approximately 1.9 miles of inactive rail corridor between Commerce Drive and Plant Road, primarily within the City of Ukiah.
<b>General Plan Designation:</b> The Great Redwood Trail - Ukiah is a designated park/recreation facility per Ukiah City Code §1965(C), and although not provided a General Plan Land Use Designation, the project area is adjacent to a mixture of commercial, public facility, residential and manufacturing uses.
<b>Zoning Designation:</b> The Great Redwood Trail - Ukiah is a designated park/recreation facility per Ukiah City Code §1965(C), and although not zoned, the project area is adjacent to a mixture of commercial, public facility, residential and manufacturing uses.

## II. INTRODUCTION

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### 1. Purpose of the Initial Study Checklist

The purpose of this Initial Study (IS) is to determine the environmental impacts associated with the proposed project and to determine if the project will have a significant adverse effect on the environment. As such, only one option—the proposed project—need be evaluated. If the IS reveals that the project will have a significant adverse effect on the environment, an Environmental Impact Report (EIR) will be required. This will necessitate the consideration of a range of reasonable alternatives that would achieve most of the basic objectives of the project but would also avoid or substantially lessen any of the significant effects of the project.

The purpose of this project is to complete the Great Redwood Trail – Ukiah within city limits, creating a safe and efficient corridor for bicycle and pedestrian traffic, and providing direct non-vehicular access to major employment centers, public services, shopping areas, residential neighborhoods, and the future Mendocino County Courthouse.

### 2. Initial Study Checklist Document

This document in its entirety is an Initial Study Checklist prepared in accordance with the California Environmental Quality Act (CEQA), including all criteria, standards, and procedures of CEQA (California Public Resource Code Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 et seq.).

Section 15063(d) of the State CEQA Guidelines states the content requirements of an Initial Study as follows:

1. A description of the project including the location of the project.
2. An identification of the environmental setting.
3. An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries.
4. A discussion of the ways to mitigate the significant effects identified, if any.
5. An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and
6. The name of the person or persons who prepared or participated in the Initial Study.

### III. PROJECT BACKGROUND

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#### 1. Project History

In 1999, the City of Ukiah began to plan a new Class I trail facility (a paved right-of-way for bicycles and pedestrians), adjacent to the Northwestern Pacific (NWP) railroad tracks in the North Coast Railroad Authority (NCRA) right-of-way corridor. The trail concept first appeared in the City's 1999 Bicycle Master Plan. The planning for the overall NWP Rail Trail Project was further advanced in the 2002 Rail Trail Feasibility Study, and the project was ranked as the highest priority in the Bicycle Master Plan in the 2006 Mendocino County Regional Bikeway Plan. In 2012, the City approved the first phase of the project, which was the first rail-with-trail project to be designed and constructed within the NCRA right-of-way in Mendocino County. Phase 1 was completed in 2015, and in that same year, the Ukiah Bicycle & Pedestrian Master Plan was adopted, furthering the City's efforts for a holistic transportation system. In 2018, the City of Ukiah approved the construction documents for Phases 2 and 3 of the Great Redwood Trail - Ukiah. Construction commenced in the winter of 2019 and it was completed by the spring of 2020. In June 2020, the Ukiah City Council officially designated the trail as a recreation/park facility and renamed it the 'The Great Redwood Trail – Ukiah'. Later that year, the City adopted the Great Redwood Trail - Ukiah Linear Park Master Plan to evaluate ancillary trail features and uses.

In May 2021 the City was awarded an Urban Greening Grant from the California Natural Resources Agency to construct Phase 4 segment of the Great Redwood Trail – Ukiah. In September 2021, the City Council awarded a professional services agreement to prepare the plans and specifications for Phase 4, which was subsequently amended in 2022. A contract was awarded by the City Council for the construction of Phase 4 in May 2024.

#### 2. Project Location

The Project "Great Redwood Trail – Ukiah (Phase 4)" is located within an inactive 1.9-mile segment of railroad corridor/right-of-way subject to the jurisdiction of the Great Redwood Trail Agency (GRTA), formerly North Coast Railroad Authority (NCRA), between Commerce Drive and Plant Road with portions within the City of Ukiah incorporated area and the County of Mendocino unincorporated area. For an overview of the GRT- Ukiah Phases 1-4, refer to Exhibit 1. Phase 1 of the GRT- Ukiah stretches from Clark Avenue to Gobbi Street. Phase 2 runs from Gobbi Street south to Commerce Drive, and Phase 3 from Clark Avenue north to Brush Street.

#### 3. Project Description

The Project involves application for an Encroachment Permit to the Great Redwood Trail Agency (GRTA) to construct a 1.9 multimodal trail segment of the GRT - Ukiah (Phase 4). The Project will provide a Class 1 paved walking and biking facility from the existing southern terminus of the GRT - Ukiah at Commerce Drive to existing municipal facilities at Plant Road that will be improved to feature a small parking area and trailhead with seating and limited recreational amenities, such as tables. In addition to safety and connectivity improvements, the trail would provide opportunities for enhanced access to the GRT – Ukiah, as the Project would cross Airport Road and Norgard Lane, and includes the proposed construction of two (2) pedestrian access points to commercial entities within the Redwood Business Park. No trail lighting is included, only lighting at the road crossings will be provided.

The proposed pathway would meander within the GRTA right-of-way and consist of a 10-foot-wide asphalt concrete paved Class I facility, with 2-foot-wide gravel shoulders on either side, for a total width of 14 feet and will parallel the existing track, which is proposed to remain (See Appendix A – Phase 4: GRT - Ukiah Plan Sheets).

The Project’s application materials are on file with the City of Ukiah Community Development Department, located at 300 Seminary Avenue, Ukiah, CA 95482 and are hereby incorporated by reference.

#### **4. Project Elements**

Key Project elements are summarized below:

##### **Trail Construction**

The meandering pathway would consist of a 10-foot-wide asphalt concrete Class 1 facility, with 2-foot-wide gravel shoulders on either side, for a total width of 14 feet. The pathway will be, at minimum, offset by 10 feet from the railroad centerline as required per GRTA Design Guidelines. A variety of equipment is proposed for use to construct the Project, including graders, bulldozers, excavators, cranes, trucks to remove dirt and deposit base and asphalt, asphalt paving machines, compacters for base, soil and asphalt, stripers, and concrete trucks and pumpers to pump concrete into forms. Staging would occur within the railroad right-of-way, at least 50 feet away from the wetlands and the top bank of waters for any associated riparian area.

Grading would need to occur along the entire trail alignment to achieve accessible slopes and suitable trail width. Similarly, fill would be placed and compacted along the alignment to establish the trail’s foundation. Grading permits would be obtained through the City and County, as needed. The civil grading design in the wetland impacted areas utilizes a more conservative interpretation of the wetland criteria. Grading activities were planned to maintain a specific area to encourage ponding and wetland generation to mitigate potential impacts engendered by construction activities.

Originally, Phase 4 of the Ukiah GRT was intended to be located on the centerline of the tracks, but the City of Ukiah elected to shift the alignment to the east side of the tracks based on concerns that railbanking would not be approved by the California Public Utilities Commission (CPUC). The result of shifting the trail to the east of the tracks introduced several additional design and environmental requirements. These issues are generally related to grading, drainage, structural integrity, tree removal and wetlands. These issues are interwoven with the environmental and resource agency permitting. The trail segment was designed pursuant to the previously adopted rail-with-trail policy of the former North Coast Railroad Authority and thus can be constructed and operated adjacent to the existing railroad tracks without necessitating the abandonment or railbanking of the subject property prior to approval.

##### **Trail Bridges**

Shifting the trail to the east of the tracks meant designing two new bridges, including efforts to coordinate the bridge foundations and related grading with existing nearby utilities. Crossings over riparian drainages identified as D1 and D2 within Appendix B (Aquatic Resource Report) will be clear spanned with pre-manufactured bridges set in place with a crane. The deck of the D1 bridge is approximately 200 square feet, while D2 is approximately 160 square feet. The deck will be concrete and 14 feet wide. Concrete footings will be cast in place 3 to 7 feet below grade and beyond the top of bank. No in-water work will be required to construct bridges.

### **Culvert Extensions**

Culvert extensions will occur at drainages D3, D4, and D5, extending approximately 15 feet, 13 feet, and 16 feet respectively. Each culvert extension will require downstream erosion control features. As proposed, existing drainage structures such as culverts would be extended to promote drainage of the trail facility and ensure the railroad would not be adversely affected by Project-related drainage.

### **Trailhead Development**

Trailhead improvements near Plant Road would include signage, bicycle parking, striping for parking, and additional trail amenities such as benches, shade structures, picnic tables, and landscaping. The design includes demolition of the existing parking lot, and new paving and parking layout to accommodate the trail to the east of the tracks

### **Tree & Vegetation Removal**

Limited tree and vegetation removal would be required for construction of the Project. If vegetation removal (e.g., clearing and grubbing) or other project-related activities must occur during the nesting season (typically March 15 to September 1), a qualified Biologist has been identified to survey for active bird nests within seven (7) days prior to the beginning of project-related activities. Additionally, mitigation and monitoring reports will be prepared and submitted annually for five years following implementation. Any replacement or newly planted trees will be monitored for 5 years. Annual reports will be submitted to the Regional Water Board by January 31 of each year following construction.

### **Pedestrian Trail Connections**

Two ADA compliant pedestrian trail connections will be constructed, consisting of an ADA compliant ramp, as well as stairs. They would be approximately 600 feet south of Commerce Drive in the Panda Express parking lot and 1,600 feet south of Commerce Drive in the Holiday Inn parking lot. The trail would be integrated into public existing at-grade crossings with bulb-outs/curb extensions, lighting, crosswalk enhancements, signage, and/or other improvements.

### **Tribal Consultation**

On August 8, 2024, a letter was sent to the Native American Heritage Commission (NAHC) requesting a current SB 18 and AB52 Native American Contact List for the project vicinity. On August 12, 2024, the NAHC provided a list of 31 tribal contacts within the greater Mendocino and Lake County vicinity surrounding Planning Area. The NAHC also indicated that a Sacred Lands File check was positive for a potential Pinoleville Pomo Nation tribal cultural resource within the greater Mendocino and Lake County vicinity. In accordance with AB 52, both the Guidiville Rancheria, who had requested to be notified of projects within the City of Ukiah's jurisdiction, and the Pinoleville Pomo Nation, were sent a formal letter and project materials on August 13, 2024. As of the drafting of this Initial Study, no request for consultation has yet been received.

### **Public and Agency Input**

During the preparation of this draft ISMND, a memorandum from Dave Anderson, PE, representing the GRTA, was received on July 23, 2024. The memorandum requests changes to the Project's Plan Sheets and Special Provisions (Appendices A and D of this draft ISMND) and raises questions on project features and design. The memorandum will be included in the draft ISMND circulation and addressed in the final Initial Study.

In addition, on August 28, 2024, a report from the Northwest Information Center (NWIC) was received indicating that previously recorded historic resources and unrecorded archaeological sites may be present within the Project area. The historical resources would likely be associated with the main stem railroad line, P-23-0003363, the Northwestern Pacific Railroad. NWIC recommends that, prior to commencement of project activities, P-23-0003363 should be assessed by a qualified professional

familiar with the architecture and history of Mendocino County. In addition, due to the lack of full and current archaeological survey coverage, archival and field studies for the entire project are recommended to be performed by a qualified archaeologist to identify any unrecorded archaeological resources.

Currently, the Great Redwood Trail Agency (GRTA) is developing a Great Redwood Trail Master Plan and associated program Environmental Impact Report (PEIR) for the Great Redwood Trail traversing Mendocino, Trinity and Humboldt counties. The PEIR process analyzes comprehensive environmental effects, including those of archaeological and cultural significance. Therefore, these NWIC results will be uploaded along with this draft ISMND and forwarded to the Great Redwood Trail Agency (GRTA) for commentary regarding the historical rail line within the Project area, and any cumulative impacts regarding archaeological or tribal cultural resources within the area.

### **Regulatory Permits**

In order to construct the project, Staff determined that permits from the California Department of Fish and Wildlife, Regional Water Quality Control Board, and United States Army Corps of Engineers may be required. The City in conjunction with its technical consultants prepared field work and studies to determine potential habitat and aquatic features, submitted necessary permit applications, and undertook subsequent coordination with the following regulatory agencies.

- U.S. Army Corps of Engineering (USACE) Clean Water Act (CWA) Section 404 permit
- North Coast Regional Water Quality Control Board (NCRWQCB) Section 401 Water Quality Certification
- California Department of Fish and Wildlife (CDFW) Streambed Alteration Agreement

### **Existing Site Conditions/Environmental Setting**

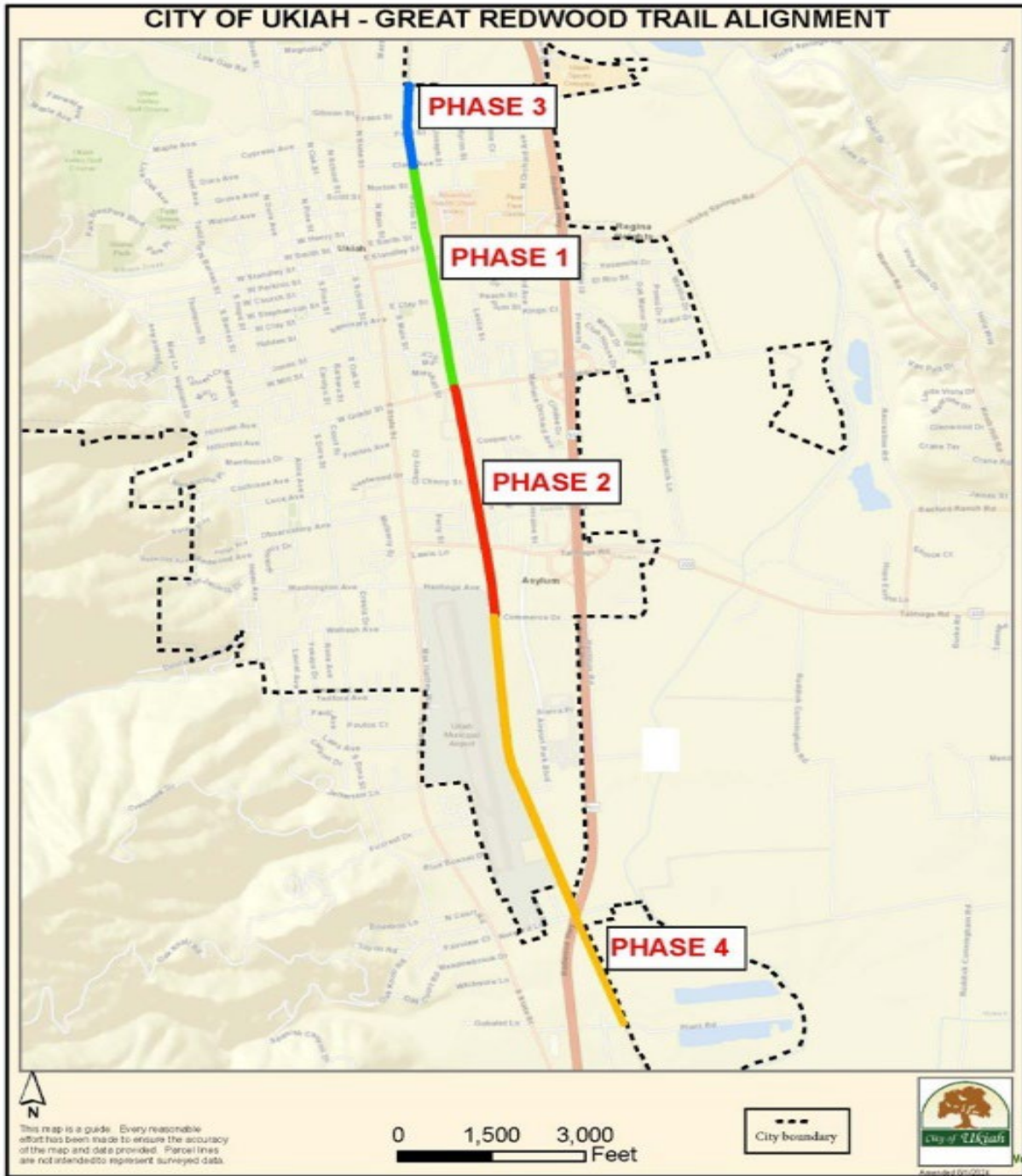
CEQA Guidelines §15125 establishes requirements for defining the environmental setting to which the environmental effects of a proposed project must be compared. The environmental setting is defined as "...the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published, or if no Notice of Preparation is published, at the time the environmental analysis is commenced..." (CEQA Guidelines §15125[a]).

The Project is located within a former railroad corridor that traverses residential, industrial, agricultural and commercial areas within and adjacent to the City of Ukiah, as well as areas within and adjacent to the County of Mendocino. The site is mostly flat with a 0 to 2 percent slope. While some naturalized areas remain along the trail, such as wetlands or valley oak woodlands, numerous segments appear highly disturbed, featuring substantial amounts of detritus and evidence of disturbance from encampments (See Appendix B Aquatic Resources Report).

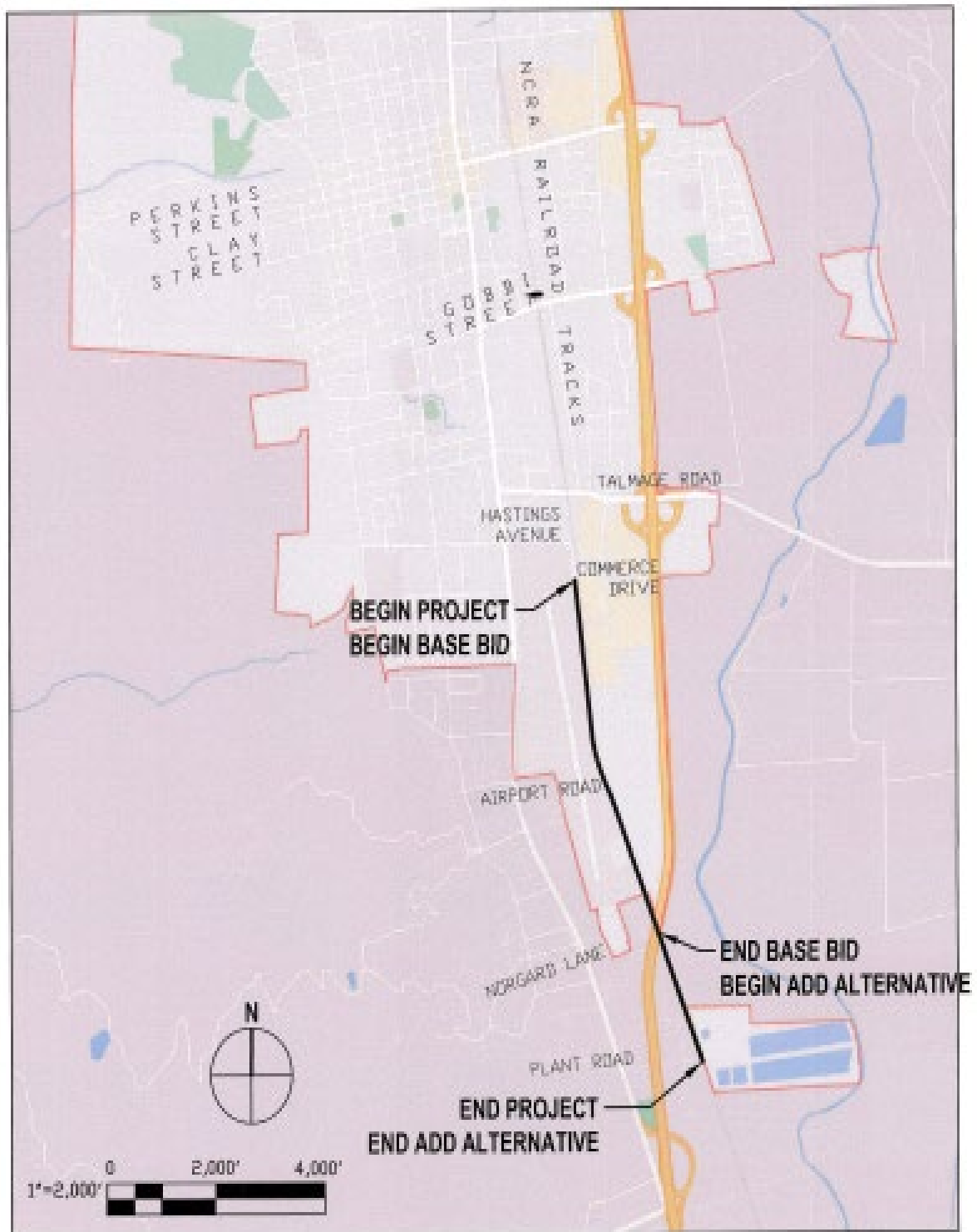
The Great Redwood Trail - Ukiah is a designated park/recreation facility per Ukiah City Code §1965(C), and although not zoned, the project area is adjacent to a mixture of commercial, public facility, residential and manufacturing uses. Nearly all the land adjacent to the Project, however, is under the ownership of the City of Ukiah, including the City of Ukiah Municipal Airport, recently annexed City-owned parcels south of Norgard Lane and north of the City's Wastewater Treatment Facility, an undeveloped parcel with frontage along Airport Park Boulevard, as well as three (3) parcels at the terminus of Airport Road.



**EXHIBIT 1: City of Ukiah – Great Redwood Trail Phases**



## EXHIBIT 2: SITE PLAN



## IV. EVALUATION OF ENVIRONMENTAL IMPACTS

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**Purpose of the Initial Environmental Study:** This Initial Study Checklist has been prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines. The Project is evaluated based on its potential effect on 20 environmental factors categorized as follows, as well as Mandatory Findings of Significance:

- |                                     |                                   |
|-------------------------------------|-----------------------------------|
| 1. Aesthetics                       | 11. Land Use and Planning         |
| 2. Agriculture & Forestry Resources | 12. Mineral Resources             |
| 3. Air Quality                      | 13. Noise                         |
| 4. Biological Resources             | 14. Population & Housing          |
| 5. Cultural Resources               | 15. Public Service                |
| 6. Energy                           | 16. Recreation                    |
| 7. Geology & Soils                  | 17. Transportation                |
| 8. Greenhouse Gas Emissions         | 18. Tribal Cultural Resources     |
| 9. Hazards & Hazardous Materials    | 19. Utilities and Service Systems |
| 10. Hydrology & Water Quality       | 20. Wildfire                      |

Each factor is analyzed by responding to a series of questions pertaining to the impact of the Project on said factor in the form of a checklist. This Initial Study Checklist provides a manner to analyze the impacts of the Project on each factor in order to determine the severity of the impact and determine if mitigation measures can be implemented to reduce the impact to less than significant without having to prepare an Environmental Impact Report.

CEQA also requires Lead Agencies to evaluate potential environmental effects based, to the extent possible, on scientific and factual data. A determination of whether or not a particular environmental impact will be significant must be based on substantial evidence, which includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

The effects of the Project are then placed in the following four categories, which are each followed by a summary to substantiate why the Project does not impact the factor with or without mitigation. If “Potentially Significant Impacts” that cannot be mitigated are found, then the Project does not qualify for a Mitigated Negative Declaration and an Environmental Impact Report must be prepared.

Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant	No Impact
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**No Impact:** No impact(s) identified or anticipated. Therefore, no mitigation is necessary.

**Less than Significant Impact:** No significant impact(s) identified or anticipated. Therefore, no mitigation is necessary and no mitigation measures are required.

**Less than Significant Impact with Mitigation Incorporated:** Potentially significant impact(s) have been identified or anticipated, but mitigation is possible to reduce impact(s) to a less than significant category. Mitigation measures must then be identified.

**Potentially Significant Impact:** Potentially significant impact(s) have been identified or anticipated that cannot be mitigated to a level of insignificance. An Environmental Impact Report must therefore be prepared.

# 1. Aesthetics

<b>AESTHETICS.</b>				
Except as provided in Public Resources Code Section 21099, would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In nonurbanized 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 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria:** Aesthetic impacts would be significant if the Project resulted in the obstruction of any scenic vista open to the public, damage to significant scenic resources within a designated State scenic highway, substantial degradation to the existing visual character or quality of the site and its surroundings from public views, or generate new sources of light or glare that would adversely affect day or nighttime views in the area, including that which would directly illuminate or reflect upon adjacent property or could be directly seen by motorists or persons residing, working or otherwise situated within sight of the Project.

**Environmental Setting:** Scenic vistas as typically described as areas of natural beauty with features such as topography, watercourses, rock outcrops, and natural vegetation that contribute to the landscape’s quality. Views of expansive hillsides, mostly within the County’s jurisdiction, surround the City. Some hillsides are densely forested with evergreen trees, while others are relatively open in comparison, dominated by mature oak trees set amid scrub and grasslands. Specific to vistas within the City limits, one of the most notable are views of the Western Hills, rising above the valley floor on the west side of Ukiah. Views within the City of Ukiah include those typical of existing residential and commercial development. In addition, some views of agricultural land uses within the City limits, or immediately outside of City limits, are available. The California Department of Transportation (Caltrans) identifies U.S. Highway 101 through the entire Ukiah Valley as a local scenic corridor but no officially designated State scenic highways occur within the City limits.

From the Project site, partial views of the Western Hills are available in the background to the west, while views of trees, riparian plants, seasonal wetlands, and commercial, industrial, and some agricultural development along the Project’s rail corridor are experienced throughout. Views within the Project Area are limited to the industrial railroad corridor, roadside vegetation, and adjacent structures

and are not considered scenic. The visual setting within the Project Area features the railroad corridor itself, and varies throughout the corridor in terms of adjacent land-uses.

**Discussion:**

**(a-d) Less than Significant.** The proposed Project would involve construction in a public scenic location within Ukiah Valley with occasional views of the Western Hills. Construction of the Project would require temporary facilities, staging areas and public safety systems such as flagging fences, barriers, lights, signs, detours, pedestrian walkways, driveway ramps and bridging as may be necessary to give adequate warning to the public that work is in progress and that dangerous conditions exist, to provide access to abutting properties and to permit the flow of pedestrian and vehicular traffic to safely and expeditiously pass the work. Construction would also require the removal of trees and other natural vegetative features to make way for the pathway on the eastern side of the tracks, which would also impact Wetlands C and D. Avoidance areas will be established to protect aquatic and biological resources within Wetlands A-D, and to allow for the re-establishment of vegetation on the site. Avoidance measures would also include the use of highly visible flagging and the temporary installation of silt fencing. The removal of trees and natural vegetation, and the presence of flagging, heavy equipment and safety materials would present a temporary visual intrusion into an otherwise scenic public place during construction.

The project is visually consistent with the railroad corridor. Any visual modifications be minimal. Apart from the required non-continuous fencing, the project does not include any tall elements that would obstruct public views.

Following construction, the Project site and adjacent wetlands would be restored, and equipment removed. Existing visual obstructions (debris and rubble) would be removed from the site and the riparian areas along, and adjacent to, the rail corridor. In addition, trees and shrubs (valley oak, common manzanita, ceanothus, and toyon) will be planted within the riparian zone along the south bank that would provide compensatory mitigation for removal of these resources during construction.

**(b,c, d) No Impact**

As noted in the project description, the Project site is in an urbanized area, surrounded by commercial and industrial development. The Project is also not located within a designated state scenic highway, and no lighting is proposed as part of the project. The proposed actions are consistent with zoning and other regulations governing scenic quality within the City of Ukiah. The project is anticipated to enhance the visual character of the area by introducing an aesthetically improved trail, facilitating pedestrian and bicycle mobility across the community, and providing opportunities for nature study and recreation. By formalizing and regulating public access within the project area, the project will reduce visual impacts caused by unauthorized use by transients and others.

**Mitigation Measures:** None

## 2. Agriculture and Forestry Resources

<b>AGRICULTURE AND FORESTRY RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Significance Criteria:** The Proposed Project would have a potentially significant impact on agricultural resources if it would convert prime farmland to a non-agricultural use, conflict with a Williamson Act contract, or disrupt a viable and locally important agricultural use. The Project would have a potentially significant impact on forestry resources if it would result in the loss, rezoning or conversion of forestland to a non-forest use.

**Environmental Setting:** Early agricultural efforts in the Ukiah Valley included the raising of livestock, and the growing of various grains, hay, alfalfa, and hops. When the Northwestern Pacific Railroad was completed in 1889; prunes, potatoes, pears, and hops could be grown and sent to San Francisco and other regional markets. Wine grapes were planted, and irrigation was practiced on a small scale. Through the 1950s, hops, pears, prunes and grapes were the most widely planted crops in the Ukiah Valley. After the railroad was completed, lumber mills sprang up in the Ukiah Valley and became the

major industry in Mendocino County as trains took redwood logs and processed boards south to the San Francisco region. Today, much of the active agricultural land is located on the Valley floor and lower elevations along the Russian River system. Only a limited percentage of the Valley's agricultural lands are currently protected under Williamson Act Agricultural Preserve contracts.

The City historically had an Agricultural Exclusive (A-E) combining district within the zoning code, but it was not applied to any lands within the city. The City's 2040 General Plan, adopted on December 7, 2022, created an Agriculture (AG) land use designation, and also includes the City's first Agricultural Element. The Project site is not designated as farmland, but is approximated by three City-owned Prime Farmland parcels, APN 184-080-37, and APN 184-090-01 roughly 150-250 ft south of Norgard lane to the east, with a General Plan designation as Public, zoned as Public Facilities (PF) with an Agricultural (A) combining district. In August 2024, the City of Ukiah introduced a Right-to-Farm Ordinance, which further strengthened awareness and protections for existing agricultural operations.

**Discussion:**

**(a-d) No Impact.** According to the California Department of Conservation Farmland Mapping & Monitoring Program, California Important Farmland Finder, the Project site is designated as "Urban Built-Up Land" and does not contain Unique Farmland, or Farmland of Statewide Importance. As such, the Project would not convert Farmland or conflict with existing zoning for agriculture or forest land. In addition, there are no parcels enrolled in Williamson Act Contracts within the Project Area. Therefore, construction and operation of the Project would have no effect on agricultural zoning or Williamson Act contracts because the Project does not involve any Williamson Act parcels.

Forest lands, timberland, or land zoned timberland production are also not present within the Project Area; therefore, no forest land or timberland would be converted to non-forest or non-timberland use. Roadside trees and vegetation currently exist within the Project's corridor that are proposed for removal. However, the Project area is not zoned forest land and the trees to be removed are not considered forest land resources. Potential biological impacts associated with tree removal are discussed in Section 4. Biological Resources. No impact would occur.

**(e) Less than Significant.** As mentioned under questions a through d, the Project would not be constructed or maintained on land designated as farmland or forest land. However, three parcels adjacent to the Project site to the east between Norgard Lane and Plant Road are designated as "Prime Farmland". Project construction activities that could indirectly affect adjacent agricultural lands include ground disturbance and vehicle use, which could result in dust emissions that could deposit dust on crops, and traffic delays associated with debris off hauling along Norgard Lane. Although indirect effects would occur, such effects would be temporary and would not result in any permanent conversion of farmland or forest lands. Indirect effects would be less than significant.

**Mitigation Measures:** None

### 3. Air Quality

<b>AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Significance Criteria:** The Proposed Project would have a significant impact to air quality if it would conflict with an air quality plan, result in a cumulatively considerable net increase of criteria pollutant which the Mendocino County Air Quality Management District (MCAQMD) has designated as non-attainment, expose sensitive receptors to substantial concentrations of air pollutants, or result in emissions that create objectionable odors or otherwise adversely affect a substantial number of people.

**Environmental Setting:** The Project is located within the North Coast Air Basin (NCAB), which includes Del Norte, Humboldt, Trinity, Mendocino, and northern Sonoma Counties. The area’s climate is considered Mediterranean, with warm, dry summers and cooler, wet winters. Summer high temperatures average in the 90s with high temperatures on very warm days exceeding 105 degrees. Summer low temperatures range between 50-60 degrees. Winter high temperatures generally range in the 50s and 60s. The average annual temperature is 58 degrees. Winter cold-air inversions are common in the Valley 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.

Air districts are responsible for attaining and maintaining the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for criteria air pollutants. The Project is located within Mendocino County (County) which is within the North Coast Air Basin (NCAB). Air quality within Mendocino County is regulated by the Mendocino County Air Quality Management District (MCAQMD). The MCAQMD is classified as attainment or unclassified for all state and federal standards except for the state respirable particulate matter (PM10) standard (CARB, 2018; CARB, 2019); therefore, the MCAQMD has prepared the Particulate Matter Attainment Plan (PM Attainment



Plan) to “prevent significant deterioration of local air quality and make reasonable efforts toward achieving attainment status for all pollutants” (MCAQMD, 2005). The Environment and Sustainability Element of Ukiah’s General Plan 2040 contains the following goal pertaining to air quality (City of Ukiah, 2022),

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.

**Discussion:**

**(a) Less than Significant with Mitigation.**

The MCAQMD Particulate Matter (PM) Attainment Plan is the applicable air quality plan for the region; it includes a description of local air quality, the sources of local PM emissions, and recommended control measures to reduce future PM levels. The PM Attainment Plan recommends control measures that would be applicable to the Project and is the permit requirement for projects with over one acre of disturbance. Since the development of the PM Attainment Plan, this control measure has been adopted as a rule by the MCAQMD and accordingly, the Project will be subject to this measure.

In addition to the PM Attainment Plan, the Project would be required to comply with any other applicable MCAQMD rules and regulations including Rule 1-400(a), Rule 1-430(a), and Rule 1-430(b). Rule 1-430 requires implementation of precautions and mitigation measures to reduce the amount of fugitive dust generated by construction and grading activities. The Project would implement **Mitigation Measure AQ-1, Fugitive Dust Reduction Measures**, consistent with the requirements of Rule 1-430. Therefore, with adherence to the requirements of all applicable MCAQMD rules and implementation of the fugitive dust control measures (listed at the end of this section), the Project would not conflict with or hinder the implementation of the applicable air quality plan and the impact would be less than significant with mitigation incorporated.

**(b) Less than Significant with Mitigation**

As discussed above, Mendocino County is considered a non-attainment area for the state PM10 standard and is designated as either attainment or unclassified for all other state and federal ambient air quality standards. As part of an effort to attain and maintain the ambient air quality standards, the MCAQMD has established thresholds of significance for emissions criteria air pollutants and their precursors, as shown in **Table AQ-1**, below. Emissions of criteria air pollutants that exceed the applicable thresholds of significance for ozone precursors (reactive organic gases [ROG] and nitrogen oxides [NOx]), PM10 exhaust, or fine particulate matter (PM2.5) exhaust would be considered significant. The MCAQMD takes a qualitative approach to evaluating impacts from fugitive dust in that projects that implement Best Management Practices during construction would be considered to have a less than significant impact with respect to fugitive dust emissions (MCAQMD, 2010).

**Table AQ-1  
MCAQMD THRESHOLDS OF SIGNIFICANCE**

	ROG (ppd)	No <sub>x</sub> (ppd)	PM <sub>10</sub> Exhaust (ppd)	PM <sub>2.5</sub> Exhaust (ppd)
Construction Emissions Threshold	54	54	82	54
Operational Emissions Threshold	180	42	82	54

NOTE: ppd = average pounds per day  
SOURCE: MCAQMD, 2010

The Project would include habitat restoration and stormwater drainage improvements, groundwater recharge and water quality enhancements, and would provide a safe an ecologically interpretive experience for park visitors. Construction emissions generated from construction of the Project would

not result in emissions of criteria air pollutants in quantities that would exceed the MCAQMD CEQA thresholds of significance. Furthermore, the Project would implement Mitigation Measure AQ-1 and **Mitigation Measure AQ-2: Best Management Practices** which would ensure that the Project implements the control measures required by Rule 1-430, as well as the Best Management Practices required by the MCAQMD. Therefore, the Project would have a less than significant impact with mitigation incorporated with respect to emissions of fugitive dust during construction.

During operation, the Project would generate minimal criteria air pollutant emissions from use of employee vehicles for routine maintenance. These operational emissions would be the same as what is currently being performed during regular maintenance of the park and would not represent a significant new source of air pollutant emissions that could exceed the MCAQMD thresholds of significance. Since both construction and operational activity associated with the Project would not generate emissions of criteria air pollutants in amounts that would exceed the applicable thresholds of significance, the Project would not result in a cumulatively considerable net increase of any criteria air pollutant for which the Project region is in non-attainment, and the impact would be less than significant.

**(c) Less than Significant.**

Sensitive land uses are those where sensitive population groups are located and include residences, schools, hospitals, convalescent homes, and other facilities where people spend significant amounts of time. Project impacts related to increased community health risk can occur by introducing a new source of toxic air contaminants (TACs) with the potential to adversely affect existing sensitive receptors in the Project vicinity. Sensitive receptors in the vicinity of the Project site include residences to the east and west off Norgard Lane. The nearest residence is located within 100 feet from the Project site boundary. The Project would generate emissions of TACs during temporary construction activity. Although operation of the Project would generate occasional employee trips associated with maintenance activity, these trips would likely be made by light-duty vehicles, which are not considered to be a source of substantial TACs or PM2.5 emissions. Vehicle trips related to the operation and maintenance of the trail would encompass activities such as annual inspections, trash and debris removal, vegetation management, repaving, and striping. The project is expected to generate minimal traffic, as motorized access will be restricted to light maintenance, police, and emergency service vehicles. Maintenance of the trail is anticipated to be conducted by City personnel.

Project construction is not expected to include intensive or prolonged construction equipment use. Due to the short duration (no one area of prolonged or intense construction activity), the Project would not result in the exposure of sensitive receptors to substantial pollutant concentrations. Therefore, the potential construction-related impact would be less than significant.

Following construction, the Project would not include any stationary sources of air emissions or new mobile source emissions that would result in substantial long-term operational emissions of criteria air pollutants. In fact, Project operation would reduce VMT resulting in reduced emissions as compared to current conditions. Vehicle trips related to the operation and maintenance of the trail would encompass activities such as annual inspections, trash and debris removal, vegetation management, repaving, and striping. The project is expected to generate minimal traffic, as motorized access will be restricted to light maintenance, police, and emergency service vehicles. Maintenance of the trail is anticipated to be conducted by City personnel. Therefore, Project operation would not expose nearby sensitive receptors to substantial levels of pollutants. The potential operation-related impact would be less than significant.

**(d) Less than Significant.**

During construction, use of diesel-powered vehicles and construction equipment could temporarily generate localized odors, which would cease upon Project completion and would not result in significant odorous impacts.

Typical land uses with the potential to generate considerable odorous impacts and odor complaints during operation including wastewater treatment plants, solid waste landfills, and composting facilities. The Project includes habitat restoration as well as groundwater improvements at a designated park/recreation facility that does not include land uses identified as common odor sources. Therefore, operation of the Project would not generate substantial odorous emissions and would not result in significant odor impacts.

### **Mitigation Measures**

#### **AQ-1: Fugitive Dust Reduction Measures.**

The Project would implement the precautions and mitigation measures required by Rule 1-430 including (MCAQMD, 2011):

- Reasonable precautions shall be taken to prevent particulate matter from becoming airborne, including, but not limited to, the following provisions:
  - Covering open bodied trucks when used for transporting materials likely to give rise to airborne dust.
  - Installation and use of hoods, fans, and fabric filters, to enclose and vent the handling of dusty materials.
  - The screening of all open-outdoor sandblasting and similar operations;
  - The use of water or chemicals for the control of dust during the demolition of existing buildings or structures.
- The following airborne dust control measures shall be required during all construction operations, the grading of roads, or the clearing of land:
  - All visibly dry disturbed soil and road surfaces shall be watered to minimize fugitive dust emissions.
  - All unpaved areas shall have a posted speed limit of 10 mph.
  - Earth or other material tracked onto neighboring paved roads shall be removed promptly.
  - Approved chemical soil stabilizers shall be applied to exposed earth surfaces in active construction areas and exposed stock piles (i.e. sand, gravel, dirt).
  - Dust generating activities shall be limited during periods of high winds (over 15 mph).
  - Access of unauthorized vehicles onto the construction site during non-working hours shall be prevented.
  - A daily log shall be kept of fugitive dust control activities.

#### **AQ-2: Best Management Practices.**

The Project shall implement the Bay Area Air Quality Management District Best Management Practices as recommended by the MCAQMD's Adopted Air Quality CEQA Thresholds of Significance and District Interim CEQA Criteria and GHG Pollutant Thresholds (MCAQMD, 2010; MCAQMD, 2013). The District Interim CEQA Criteria and GHG Pollutant Thresholds indicates that the agencies should use the Bay Area CEQA thresholds for projects in Mendocino County. Therefore, the Project shall implement the following Best Management Practices (BAAQMD, 2017):

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per 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 5 minutes (as required by the California airborne toxic control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturers specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. The person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

## 4. Biological Resources

<b>BIOLOGICAL RESOURCES</b>				
Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria:** Project impacts upon biological resources would be significant if any of the following resulted: substantial direct or indirect effect on any species identified as a candidate, sensitive, or special status species in local/regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) or any species protected under provisions of the Migratory Bird treaty Act (e.g. burrowing owls); substantial effect upon riparian habitat or other sensitive natural communities identified in local/regional plans, policies, or regulations or by the agencies listed above; substantial effect (e.g., fill, removal, hydrologic interruption) upon state or federally protected wetlands; substantially interfere with movement of native resident or migratory wildlife species or with established native resident or migratory wildlife corridors;

conflict with any local policies/ordinances that protect biological resources or conflict with a habitat conservation plan.

### **Environmental Setting:**

Databases queried for the presence of biological resources included the California Department of Fish and Wildlife California Natural Diversity Database (CNDDDB), the U.S Fish and Wildlife Service's (USFWS) Critical Habitat Mapper. In addition, on March 10, 2023, the Project received a North Coast California Department of Fish and Wildlife (CDFW) Lake and Streambed Alteration Agreement (Agreement) that identified potentially impacted biological species (See Appendix F). From these resources, existing fish or wildlife resources the project could substantially adversely affect include Chinook Salmon (*Oncorhynchus tshawytscha*), Steelhead Trout (*Oncorhynchus mykiss*), Pacific Lamprey (*Entosphenus tridentata*), Coastal Giant Salamander (*Dicamptodon tenebrosus*), California Newt (*Taricha torosa*), Red-bellied Newt (*Taricha rivularis*), Foothill Yellow-legged Frog (*Rana boylei*), Northwestern Pond Turtle (*Actinemys marmorata*), along with other amphibians, reptiles, aquatic invertebrates, mammals, birds, and other aquatic and riparian species.

On March 3, 2022, an Aquatic Resources Report/Delineation of Water of the United States, Including Wetlands, was performed for the Project by Jane Valerius Environmental Consulting. Four seasonal wetland areas (Wetlands A-D) and five drainages (D1-D5) were mapped for the Project area (See Appendix B Aquatic Resources Report).

- Starting in the south of the Project site, Wetland Area A is approximately 9,351 sf and is located south of Plant Road and is drier in the southern portion and then becomes more wetland as it goes north with saturated soils, algal matting and wetland plants defining this area.
- Drainage D1 occurs approximately 5,433 sf within the Project site at Plant Road, is approximately 20-foot wide at the high-water mark, is rock lined with little to no soil development, and is proposed for integration with trailhead seating and recreational amenities.
- Drainage D2 lies approximately 639 sf within the Project site and has been previously disturbed by both the railroad and Highway 101.
- Wetland Area B is a small 109 sf seasonal wetland within the Project site dominated by Himalayan blackberry and ryegrass.
- Wetland Area C is approximately 2,489 sf within the Project area and is fed by the culverts under the railroad tracks and is also dominated by Himalayan blackberry and ryegrass.
- Wetland Area D is approximately 6,502 sf with the Project area, contains wetland vegetation, some willow trees (*Salix* spp.) and has been disturbed by homeless encampments including human refuse.
- Drainage D3 includes 99 sf within the Project area and is associated with a culvert under the railroad tracks.
- Drainage D4 is approximately 284 sf within the Project area and is also associated with a culvert under the railroad tracks.
- Drainage D5 is approximately 3,580 sf within the Project area, and includes an area proposed for a park.

Plant species observed ranged from facultative (FAC) plants such as Dallis grass (*Paspalum dilitatum*), ryegrass (*Festuca perennis*), and Himalayan blackberry (*Rubus armeniacus*), to facultative wetland (FACW) plants such as tall flat sedge (*Cyperus eragrostis*), to obligate (OBL) plants such as iris-leaved rush (*Juncus xiphioides*) and pennyroyal (*Mentha pulegium*). Wetland Area A is dominated by FAC species at the south end and then becomes dominated by OBL plants from the central to the north end of the mapped area. Wetland Areas B and C are also dominated by FAC species are disturbed, marginal wetlands. Wetland Area D is dominated by iris-leaved rush, which is an OBL plant

species. This area is also highly disturbed from homeless people camping and leaving trash in the area, but it appears there may be groundwater supporting this wetland area as soils were saturated but not ponded.

The study also identified non-native annual grassland with annual grasses such as wild oats (*Avena barbata/sativa*), bromes (*Bromus diandrus*, *B. hordaceus*), hare barley (*Hordeum murinum* ssp. *leporinum*), medusa-head grass (*Elymus caput-medusae*), tall fescue (*Festuca arundinacea*), Harding grass (*Phalaris aquatica*), and weedy annual forbs such as wild radish (*Raphanus sativus*), fennel (*Foeniculum vulgare*), prickly lettuce (*Lactuca serriola*), vetch (*Vicia sativa*), and moth mullein (*Verbascum blattaria*), outside of the wetland areas.

Valley oak (*Quercus lobata*) woodland was observed along drainage D1 and D5 and valley oak trees along with many saplings occur within the study area. Other tree and shrub species noted include maple (*Acer* sp.), coyote brush (*Baccharis pilularis*), and poison oak (*Toxicodendron diversilobum*). Some willows (*Salix* spp.) occur at Wetland Area D. See Appendix B Aquatic Resources Report for images and locations.

The Project will construct five encroachments, located at drainages D1-D5, adjacent to the Mendocino Railroad stream crossing infrastructure on the east side of the railroad grade.

Two encroachments are for the replacement of pedestrian bridges (D1 and D2). The encroachments at D1 and D2 will include:

- Excavating the banks
- Removing the existing footings and abutments
- Concrete footing and abutment from construction, pouring, and curing
- Backfilling and compaction of fill, and
- Installing the bridge superstructure
- Enhancement and restoration activities (D1)

The encroachments at D3, D4, and D5 are culvert extensions that extend the existing railroad grade stream crossings and will include:

- Removing trees and vegetation
- Grading
- Placing culvert beddings
- Installing culvert extensions
- Backfilling and compaction of fill
- Installing rock slope protection below the culvert outlets and headwalls, and
- Installing a manhole between the existing culvert and the extension (D3)
- Dewatering (D4)
- Enhancement and restoration activities (D5)
- Constructing the pedestrian trail per design plans per Appendix A Phase 4: GRT – Ukiah Plan Sheets

As listed above, the Project proposes to perform enhancement and restoration activities to improve the functionality and quality of drainages (D1 and D5). A wetland area outside of the Project footprint on the west side of the railroad tracks, south of Drainage D3 and north of Wetland D, will be enhanced and restored as mitigation for the partial loss of Wetland D habitat with Project activities. This wetland feature is currently scattered with significant debris and garbage. Enhancement activities would

include removal of trash and other man-made debris and will establish an additional 4,400 square feet of wetland.

## **Discussion:**

**(a) Less than Significant with Mitigation** The activities described above may directly affect fish, wildlife and their habitat via loss or decline of riparian habitat, loss of benthic organisms, impediment of up or downstream migration, water quality degradation and damage to aquatic habitat and function. During construction, sensitive species may be killed, injured, or forced to abandon habitat by vegetation removal, human and vehicle traffic, excavation, and other disturbance.

As part of the Project design, avoidance and minimization measures have been incorporated to address these impacts and include:

### 1. ESA Flagging or Fencing of Wetlands

Prior to construction activities, adjacent wetlands will be flagged or fenced to clearly delineate wetlands to be protected during construction. All crews will have a set of environmental drawings showing the locations of the known wetlands. The plans will also define the fencing installation procedure. The Project's special provisions package will provide clear language regarding acceptable fencing material and prohibited construction-related activities, vehicle operation, material and equipment storage, and other surface-disturbing activities within wetland areas.

### 2. Prevent Impacts to Nesting Birds

To the extent feasible, tree and vegetation removal activities shall occur during the non-nesting season (September 1 to March 1st).

If construction activities begin during the nesting season (February 15 to August 31), a qualified biologist shall conduct a preconstruction nest survey of all trees and other potential nesting habitat within and adjacent to the work area no more than seven (7) days prior to the initiation of work. In addition to surveying the work area, the biologist shall survey within 50 feet of the work area for passerine nests and scan all trees within 250 of the work area for raptor nests.

If the survey indicates the presence of nesting birds, the biologist shall determine an appropriately sized buffer around the nest in which no work would be allowed until the young have successfully fledged (or the nest has been abandoned). The size of the nest buffer shall be determined by the biologist and shall be based on the nesting species and its sensitivity to disturbance. In general, buffer sizes of up to 250 feet for raptors and 50 feet for other birds should suffice to prevent disturbance of active nests, but these buffers may be increased or decreased, as appropriate, depending on the bird species and the level of disturbance anticipated near the nest.

In addition to these avoidance measures, mitigation, as proposed by the California Department of Fish and Wildlife (See Appendix F) would reduce these affects to less than significant with **Mitigation Measure BIO-1**. This measure would include extending the avoidance window of nesting birds to March 15, mitigating impacts to aquatic life during stream/wetland dewatering, and a prohibition on monofilament netting (see Mitigation Measures below for full text).

The mature trees and utility poles within the Project site provide perches for raptors, including white-tailed kite and osprey, seeking prey in the annual grasslands below. Mature trees offering crevices



and cavities may provide habitat for bat roosting. Preservation of existing mature trees, and the planting of new native trees could support raptors and other birds as well as common and special status bats, including pallid bat. The enhancement of dense groundcover would support the presence of several common ground-nesting bird species for roosting, nesting, and protection from predators, such as California quail. During construction, vegetation removal could kill or injure nesting birds or roosting bats or result in nest or roost abandonment. These impacts would be significant. However, **Mitigation Measures BIO-1** would be implemented to reduce impacts on nesting birds and roosting bats to a less than significant level.

**(b) Less than Significant with Mitigation** Vegetation trimming and removal will be necessary for movement of equipment, installation of the trail and restoration features. In addition, ground disturbance may result in erosional flow towards the wetlands, potentially damaging riparian vegetation and contributing to sediment transport. These potential impacts to riparian habitat during construction would be significant.

As part of the Project design, avoidance and minimization measures have been incorporated to address these impacts and include:

1. Implementation of Storm Water Pollution and Prevention Plan (SWPPP)

A stormwater pollution pretention plan (SWPPP) will be developed and implemented, which will prescribe Best Management Practices such as silt fencing or other sediment control infrastructure. To prevent impacts from spills, construction equipment should be staged away from wetlands or sensitive habitat, and a spill prevention plan shall be in place to prevent runoff and contamination into the surrounding wetlands and drainage ditches. Excavated materials will be stockpiled away from sensitive habitat, in areas that are relatively level, and runoff control measures as described above will be used to prevent delivery of sediment to wetlands and watercourses. If wattles are used, they will consist of certified sterile, weed-free materials.

2. Spill Prevention Plan

To prevent impacts from inadvertent spills a spill prevention plan shall be in place to prevent runoff and contamination into adjacent waters and wetland drainage ditches. The Plan shall address the following:

- Construction equipment will be staged at least 50 feet away from the wetlands and the top of bank of waters.
- Construction equipment shall be cleaned and inspected prior to use. Mechanized construction equipment that will be used on the banks and in the channel will be cleaned and inspected daily prior to use. Servicing and refueling of vehicles and equipment shall be conducted a minimum of 50 feet from wetlands and waters at designated staging areas to avoid contamination through accidental drips and spills.
- Equipment shall be inspected daily by the operator for leaks or spills. If leaks or spills are encountered, they shall be cleaned up, and the cleaning materials shall be collected and shall be properly disposed. The source of the leak shall be identified prior to operating the equipment with resolution of the leak documented by the foreman. Spills shall be cleaned up immediately using spill response equipment.

- Hazardous materials shall not be stored within 200 feet of wetlands or waters.

**Mitigation Measure BIO-2** will require the submittal of the SWPPP and issuance of the North Coast Regional Water Quality Control Board's Construction General Permit. Along with adherence to **Mitigation Measure BIO-1** and **BIO-3** (see discussion below), the potential adverse effects on riparian habitat would be mitigated to less than significant.

**(c) Less than Significant with Mitigation** The Project may have the beneficial effect of expanding the trail's riparian corridor's diverse array for habitat of vegetation and wildlife. Enhancement of native wetland surrounding the off-site mitigation area west of Wetland D, including removal of contaminated soils would improve water quality. Additionally, the Project enhancement would increase habitat complexity by promoting improved primary and secondary food web production. Wetlands and waters along, and adjacent to, the rail corridor have been degraded over time by a variety of debris and trash. Connecting and enhancing the riparian areas where there are large gaps in riparian vegetation along some of the waters could better support dispersal opportunities of species such as western pond turtle and foothill yellow legged frog while increasing flood capacity.

Similarly, native vegetation enhancement of the seasonal wetlands would support a more complex wetland habitat and accommodate more extreme flood events through grading, stabilization, and planting of native species. Soil re-nourishment, control of weeds, and improvement of native plant recruitment would encourage native plant populations throughout the Project site.

Ground disturbances during construction could result in erosional flow into wetland areas, causing damage to the vegetation or soils. This potential indirect impact to seasonal wetlands during construction could be significant. Solid fill impacts from the construction of the trail will be mitigated by the enhancement of wetlands and enhancement and restoration of waters within the vicinity of, and hydrologically connected to, the Project (See **Table BIO-1** below for a summary of impacts and mitigation).

**Table BIO-1**  
**WATERS AND WETLANDS IMPACTS AND ENHANCEMENT RESTORATION**

Feature	Action	Square Feet	Acre
Waters D5	Enhancement (debris removal, plantings)	16,125	0.37
Waters D1	Enhancement (plantings)	2,000	0.05
<b>TOTAL Waters Mitigation</b>		<b>18,125</b>	<b>0.42</b>
<b>TOTAL Waters Fill Impact</b>		<b>351</b>	<b>0.009</b>
Existing Wetland West of Rail	Enhancement and Restoration	1,015	0.02
New Wetland West of Rail		4,400	0.10
<b>TOTAL Wetlands Mitigation</b>		<b>5,415</b>	<b>0.12</b>
<b>TOTAL Wetlands Fill Impact</b>		<b>4,976</b>	<b>0.11</b>

As part of the Project design, the following actions and success criteria have been developed to minimize impacts to waters and wetlands.

1. Enhancement and Restoration of Existing Wetland West of Rail

This wetland area is located outside the project footprint, on the west side of the rail, south of Waters D3 and north of Wetland D, (trail improvements occur on the east side rail at this location). This wetland feature is scattered with significant debris and garbage. Enhancement activities include removal of trash and other man-made debris and will occur within 625 square feet (48 linear feet) of this wetland feature. In addition, a rug placed at the northern end of the wetland has cut water flow to additional wetland area to the north. When the carpet is removed, it is anticipated that approximately 390 square feet of wetland will be restored in this area.

Success criteria will be measured by the complete removal of the man-made debris and garbage. Vegetation is anticipated to naturally grow back in patches that have been blocked by sun or cut off from water. Monitoring is proposed for year one to verify vegetation accretes naturally to the extent there is little difference as compared to adjacent existing wetland vegetation (based on pre-construction photos). If it is determined after one year, that the vegetation is not accreting at a satisfactory rate, as determined by a wetland ecologist/botanist, a wetland seed mix (See Appendix G Avoidance and Minimization Measures) will be spread in bare patches. If reseeding is required, then monitoring will occur for an additional year with pre and post conditions photo documented.

## 2. Enhancement and Restoration of Water D5 and Enhancement of Waters D1

To accommodate the trail, the existing two culverts at D5 will be extended 10 feet east from the existing outlet. Downstream of D5, substantial trash, debris, and concrete rubble has been dumped within the channel. Although removing the concrete rubble could be considered restoration, for the purposes of simplifying calculations, the entire length from the D5 culvert to Airport Boulevard Road is calculated as one number. Enhancement and restoration activities include removal of all trash and concrete rubble from top of bank to top of bank within the channel. In addition, approximately 31 trees and shrubs (valley oak, common manzanita, ceanothus, and toyon) will be planted within the riparian zone along the south bank to enhance water quality and habitat. The enhancement and restoration area within the D5 channel is approximately 11,125 square feet (445 linear feet) and the enhancement area within the riparian is approximately 5,000 square feet.

Success criteria will be measured by the complete removal of the trash and concrete rubble within the channel. No monitoring is required for trash and concrete removal. Tree and shrub plantings will be monitored for health and survival for five years. Success criteria will be measured by an 85% survival rate after five years. Photo documentation from a consistent vantage point and written documentation as to the quantity and health of the trees and shrubs will be compiled in a memo each year. If the survival rate falls below 85%, new plantings will occur following the recommendation of the qualified arborist or plant ecologist monitoring the site.

## 3. Establish Wetland West of Rail

At the suggestion of North Coast Regional Board staff during a site visit in June of 2024, three areas on the west side of the rail, in the vicinity of Wetland C and D, will receive minor depression grading at the culvert inlets to extend out the existing wetland (see Sheet C-111, C-112, and C-113 of Appendix A). These areas will be in the vicinity of the existing wetland to be enhanced and restored. The graded areas will be reseeded with an appropriate wetland seed mix (See Appendix G Avoidance and Minimization Measures for details).

Monitoring will be performed by a qualified wetland biologist/ecologist and is proposed to occur for up to three years or until the graded areas match the vegetation density of the existing wetland and are dominated by wetland plants. The existing wetland will be used as a benchmark for

determining density. If it is determined after year one of monitoring that the vegetation is not progressing at a satisfactory rate to support a functional wetland, the area will be considered for reseeded or plugs.

Impacts to wetlands would be mitigated to a less-than-significant level through implementation of **Mitigation Measures BIO-3**. This measure would include adherence to the Project's Avoidance and Minimization measures as outlined above, review of mitigation success by the North Coast Regional Water Quality Control Board (NCRWQCB), and mitigation monitoring and project tracking (see Mitigation Measures below for full text).

#### **(d) Less than Significant**

All five drainages on the site flow east towards the Russian River, which can be a seasonal movement corridor for fish and wildlife species, including the Chinook Salmon (*Oncorhynchus tshawytscha*), Steelhead Trout (*Oncorhynchus mykiss*), Pacific Lamprey (*Entosphenus tridentata*) identified by the CDFW (Appendix F). Work within or affecting this community during construction may temporarily inhibit the use of this area as a wildlife corridor or nursery site. However, following construction, the wetlands and drainages will be maintained and expanded, providing for continued use as a movement corridor and potential nursery site. In addition, **Mitigation Measure BIO-1** would reduce this impact to less than significant by adhering to all avoidance and minimization measures as written in the CDFW Lake and Streambed Alteration Agreement for the Project, including requiring sufficient water flow through all cofferdams or other artificial obstructions, and instating protocols on stranded aquatic life.

**(e) Less than Significant with Mitigation.** The City of Ukiah 2040 General Plan, and specifically the Environment and Sustainability Element, (adopted December 7, 2022) contains goals and policies related to preservation and protection of environmental resources, such as trees, sensitive species and habitat, water quality, the Russian River and its tributaries, and wetlands. Additionally, the Public Facilities, Services and Infrastructure Element contains policies specificity to maintenance of parks and recreation facilities (City of Ukiah, 2022).

The City of Ukiah Tree Management Guidelines (City of Ukiah, 2023) provides policy guidelines for the preservation, maintenance, and enhancement of the urban forest in parks and other areas maintained by the staff and contractors of the City of Ukiah. As part of the Project design, the following actions have been developed to minimize impacts to trees by the City Engineer and contractors.

1. The locations of trees planned for removal are shown on the Plans. The Engineer shall be contacted a minimum of 48-hours prior to any tree removal to perform an on-site inspection and clearance. Trees shall be removed in a manner satisfactory to the Engineer. Tree roots that are identified on the Plans to be removed that are in conflict with new facilities shall be removed in their entirety or to provide the minimum clearances to new facilities as indicated below, regardless of root diameter. Where tree roots that are not identified on the Plans to be removed interfere with the construction or reconstruction of curb, gutter, sidewalk, pavement, utilities, other facilities, the Contractor shall excavate and expose the roots for inspection by the Engineer. Upon approval from the Engineer, the Contractor shall remove tree roots which are four (4) inches or less in diameter to provide a minimum clearance of six inches to any new facility.

In addition, **Mitigation Measure BIO-4** will require a Tree Protection and Replacement Plan to ensure compliance with the City of Ukiah Tree Management Guidelines.

**(f) No Impact.** No adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan is applicable to the Project site. Thus, there would be no impact.

**Mitigation Measures:**

**BIO-1: Adherence to CDFW LSAA**

All Project work shall adhere to the measures to protect fish and wildlife as written in the California Department of Fish and Wildlife (CDFW) Lake or Streambed Alteration Agreement Notification (LSAA) No. EPIMS-MEN-32359-R1C including the following measures:

1. Avoidance of Nesting Birds. Vegetation maintenance or removal (e.g., clearing and grubbing) shall occur between September 1 and March 15 unless Nesting Bird Surveys are completed and submitted to CDFW. Removal areas should be managed once cleared to reduce nesting potential during the breeding season.
2. Nesting Bird Surveys. If vegetation maintenance or removal (e.g., clearing and grubbing) or other project-related activities must occur during the nesting season, typically March 15 to September 1 (and depending on species and habitat quality from mid-January to mid-September) a qualified Biologist shall survey for active bird nests within seven (7) days prior to the beginning of project-related activities. Surveys shall begin prior to sunrise and continue until vegetation, nesting behavior, and nests have been sufficiently observed. A report of the surveys shall be submitted to CDFW by email within three (3) business days of survey completion. The report shall include a description of the area surveyed, time and date of surveys, ambient conditions, species observed, active nests observed, evidence of breeding behaviors (e.g., courtship, carrying nesting material or food, etc.), and a description of any outstanding conditions that may have impacted survey results (e.g., weather conditions, excess noise, predators present, etc.). If an active nest is found, Permittee shall implement avoidance measures in consultation with CDFW. IF a lapse in project-related work of seven (7) days or longer occurs, the qualified Biologist shall repeat surveys before project work can resume.
3. Maintain Aquatic Life. When any cofferdam or other artificial obstruction is being constructed, maintained, or placed in operation, Permittee shall allow sufficient water at all times to pass downstream to maintain aquatic life below the obstruction pursuant to Fish and Game Code §5937.
4. Stranded Aquatic Life. The Permittee shall check daily for stranded aquatic life as the water level in the dewatering area drops. All reasonable efforts shall be made to capture and move all stranded aquatic life observed in the dewatered areas. Capture methods may include hand nets, dip nets, buckets, and/or by hand. Captured aquatic life shall be released immediately in the closest suitable aquatic habitat adjacent to the work site. Permittee shall submit detailed information regarding species that were stranded and relocated to the CDFW as described in the LSAA agreement.

**BIO-2: Development of a SWPPP and compliance with the NCRWQCB Construction General Permit**

The Construction Site Operator shall develop a Stormwater Pollution and Prevention Plan (SWPPP) and comply with the permit issued by the North Coast Regional Water Quality Control Board (NCRWQCB) for the National Pollutant Discharge Elimination System (NPDES) Department of Water Quality Construction General Permit, Permit No. 2009-0009. prior to commencement of construction activities.

**BIO-3: Adherence to NCRWQCB Water Quality Certification**

All Project work shall adhere to the Avoidance and Minimization Measures as approved by the North Coast Regional Water Quality Control Board Water Quality Certification ECM PIN CW-882169; WDID 1B22090WNME including the following project-specific measures:

1. Compensatory mitigation shall be implemented in accordance with the *Attachment 2 The Great Redwood Trail Phase 4 Project – Avoidance and Minimization Measures* submitted by the Applicant on January 13, 2023, and any subsequent revisions approved by the Executive Officer. Project mitigation includes a plan to remove trash and debris, extend wetlands with depressional grading, and plant in riparian areas as described by the plan. The Applicant proposes to monitor the revegetation to ensure 85% planting success criteria are met after 5 years which may be supplemented by appropriate volunteer riparian species. The applicant shall restore all temporary impact areas to pre-project condition.
2. Mitigation success shall be subject to the review and acceptance by Regional Water Board staff and shall not be considered successful until a minimum of five years of monitoring has occurred. Plants shall not be considered successful until irrigation has been terminated and plants are self-sustaining for a minimum of two years.
3. Mitigation and monitoring reports shall be submitted annually for five years following mitigation implementation (Reports). Reports shall be submitted to the Regional Water Board by January 31 and detail the monitoring results from the prior calendar year. The reports shall be submitted to the following email address: [NorthCoast@waterboards.ca.gov](mailto:NorthCoast@waterboards.ca.gov)  
Reports shall include:
  - Year 1 report will include as-built plans for all plants;
  - Maintenance activities performed
  - Monitoring methods
  - Monitoring data summarized
  - Time-series photographs
  - Annual performance and whether success criteria are met
  - Recommendations for adaptive measures
4. Within 30 days of issuance of this Order, the Applicant shall upload Project information to EcoAtlas using the “Project Tracker” form found at the following website: <http://ptrack.ecoatlas.org/> Required information includes a Project map that may either be uploaded to EcoAtlas or created within EcoAtlas by using the “draw polygon” tool. Required mitigation monitoring reports shall be uploaded to EcoAtlas by March 1 following the certification January 31 monitoring report due date.

#### **BIO-4 Approval of a Tree Protection and Replacement Plan**

1. A Tree Protection and Replacement Plan, consistent with City of Ukiah General Plan and the City of Ukiah Tree Management Guidelines, shall be submitted for review and approval from the Public Works Department prior to Project construction. All requirements and restrictions within those documents would be complied with, including the incorporation of replacement trees for each tree removed. Guidance on tree protection, removal, and replacement provided in Sections 7.1 and 7.2 of the City of Ukiah’s Tree Management Guidelines (City of Ukiah, 2023) shall be followed.

## 5. Cultural Resources

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

**Significance Criteria:** The proposed Project would significantly impact cultural resources if the significance of a historical or archaeological resource were substantially changed, or if human remains were disturbed. Historical resources under CEQA include historic-era architectural resources within the built environment such as buildings, structures, and other objects. Archaeological and unique archeological resources can also be considered historical resources, according to CEQA Section 15064.5 and Section 21083.2(g).

Section 15064.5 states the term “historical resources” includes the following:

- 1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.);
- 2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant;
- 3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. 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 (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:
  - a. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
  - b. Is associated with the lives of persons important in our past;

- c. 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 d. Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California 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 section 5020.1(j) or 5024.1.

- a. "Historical resource" includes, but is not limited to, any object, building, structure, site, area, place record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

Section 15064.5 also states that a project with an effect 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. "Substantial adverse change in the significance of a historical resource" means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

The significance of a historical resource is materially impaired when a project:

- a. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- b. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- c. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Section 21083.2(g) identifies a unique archeological resource as an archaeological 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.
- 2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- 3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.



The California Office of Historic Preservation (OHP) houses the Built Environment Resource Directory (BERD). BERD files provide information regarding non-archaeological resources in OHP's inventory. Each resource listed in BERD is assigned a status code, which indicates whether resources have been evaluated as eligible under certain criteria. This tool provides information to assist in identifying potentially historic resources throughout the County.

**Environmental Setting:** 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 City of Ukiah was first settled in 1856 by Samuel Lowry. Initially incorporated into Sonoma County, an independent Mendocino County government was established in 1859 with Ukiah as the chosen county seat. Logging, cattle, and agricultural ventures contributed to the early settlement and growth of Ukiah throughout the remainder of the 19th century and early 20th century. 1889 is the date recorded for the first arrival of the train to Ukiah, quickly resulting in increased settlement of the City and its environs.

The late 19th century saw slow growth in the community, with a slight decline after the turn of the century. The town grew steadily, though it remained a relatively remote outpost in the hinterlands of Northern California for several more decades. The area around the intersection of the current Perkins and Main streets was one of the earliest settlement locations for the town. Absalom Tidwell Perkins built a house for his family near the southwest corner of the current Perkins and Main streets, and built a feed stable on the Project site around 1857. By 1860, Ukiah had approximately 25 dwellings and a budding commercial district. Ukiah's sparse population and relative remoteness delayed the arrival of the railroad. In 1886 the Cloverdale and Ukiah Railroad was formed to extend north to Ukiah; and the line was completed in 1889, 20 years after it began in Petaluma in 1869. The improved transportation network did open up Mendocino County to greater commercial and industrial growth, though the population did not expand rapidly.

For 92 years the Northwestern Pacific Railroad (NWP) ran trains through the City, and the broader Mendocino County. Lumber mills and other customers provided significant traffic along the railway. Passenger service was discontinued in 1958. In 1989, the North Coast Railroad Authority (NCRA) was formed by the State Legislature to ensure continuation of railroad service. In 1998, the entire line was closed due to flood damage, and no trains have operated on the railway since that time. The Great Redwood Trail Agency (GRTA), formed in 2021 from the NCRA currently manages the GRT in Mendocino County. An amended 2020 license agreement between the City of Ukiah and the GRTA authorizes the City to construct, install, maintain, reconstruct, remove, repair and manage a multi-modal public path for bicyclists, pedestrians, wheelchairs, joggers, and other non-motorized uses pursuant to the NCRA's Rails-with-Trails Policy and Procedure Manual (See Appendix C NCRA License Agreement).

**Discussion: (a-c) Less than Significant.** The Project area has historically been used for municipal (public) purposes and is previously disturbed. Ukiah's Historic and Architectural Inventory Table shows no historic structures within the Project area. The California Built Environment Resources Directory (BERD) does show that the Northwestern Pacific Railroad Depot at 305 E. Perkins Street north of the Project site as designated historic.

On August 13, 2024, the Northwest Information Center (NWIC) was queried for potential sensitive archaeological and historical resources. The results, received on August 28, 2024, indicate that previously recorded historic resources may be present within the Project area. These resources would likely be associated with the main stem railroad line, P-23-0003363, the Northwestern Pacific Railroad. NWIC recommends that, prior to commencement of project activities, P-23-0003363 should be assessed by a qualified professional familiar with the architecture and history of Mendocino County. These NWIC results will be uploaded along with this draft ISMND and forwarded to the Great Redwood Trail Agency (GRTA) for commentary regarding the historical rail line within the Project area. Along with the comments received from the GRTA project engineer on July 23, 2024, any additional information provided for the historical components of P-23-0003363 will be incorporated into the assessment of the final ISMND.

In regard to archaeological resources and human remains, on August 8, 2024, a letter was sent to the Native American Heritage Commission (NAHC) requesting a current SB 18 and AB52 Native American Contact List for the project vicinity. On August 12, 2024, the NAHC provided a list of 31 tribal contacts within the greater Mendocino and Lake County vicinity surrounding Planning Area. The NAHC also indicated that a Sacred Lands File check was positive for a potential Pinoleville Pomo Nation tribal cultural resource within the greater Mendocino and Lake County vicinity. In accordance with AB 52, both the Guidiville Rancheria, who had requested to be notified of projects within the City of Ukiah's jurisdiction, and the Pinoleville Pomo Nation, were sent a formal letter and project materials on August 13, 2024. As of the drafting of this Initial Study, no request for consultation has yet been received.

As discussed under 3. Biological Resources, the proposed off-site wetland mitigation area west of Wetland D, south of Waters D3 and north of Wetland D, on the west side of the rail would also require shallow excavation for new wetland habitat. While these areas are both previously disturbed, the potential for inadvertent discovery of cultural material or human remains is still present. As part of the project design (See Appendix D), mitigation has been incorporated to address these potentials and reduce impacts to less than significant, including the following:

1. If archaeological resources are discovered at the job site, including chipped or ground stone, historic debris, building foundations, and human bone, do not disturb the resources. Immediately stop all work within 100 feet of the discovery, protect the discovery area, and notify the Engineer.
2. If human remains of Native American origin are discovered during project construction, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) (Public Resources Code 5097). If any human remains are discovered or recognized in any location other than a dedicated cemetery, there will be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
  - The County Coroner has been informed and has determined that no investigation of the cause of death is required; and
  - If the remains are of Native American origin, the descendants of the deceased Native Americans have made a recommendation to the landowner of the person responsible for the excavation work for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code 5097.98
3. If human remains are discovered during any demolition/construction activities, all ground-disturbing activities within a 330 foot radius of the remains shall be halted immediately, and

the Mendocino County coroner shall be notified immediately, according to Section 5097.98 of the state Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the County coroner to be Native American, the NAHC shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The City shall consult with the Most Likely Descendant, if any, identified by the NAHC regarding the treatment and disposition of the remains.

4. Should paleontological resources be identified at any project construction site, the Contractor shall cease operation within a 330-foot radius of the discovery and immediately notify the City. The City will provide a qualified paleontologist to provide an evaluation of the find and to prescribe mitigation measures to reduce impacts to a less-than-significant level. In considering any suggested mitigation proposed by the paleontologist, the City shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the discovery, project design, costs, land use assumptions, and other considerations. If avoidance is unnecessary or infeasible, other appropriate measures shall be instituted. Work may proceed on other parts of the project site while mitigation for paleontological resources is carried out.

**Mitigation Measures:** None

## 6. Energy

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

**Significance Criteria:** The Proposed Project would significantly impact energy if construction or operation of the Project would result in wasteful, inefficient or unnecessary consumption of energy resources or if the Project would conflict with a state or local plan for renewable energy or energy efficiency.

**Environmental Setting:** The Environment and Sustainability Element and the Mobility Element of the City's 2040 General Plan contains goals, policies, and implementing programs to promote energy use efficiency and conservation. Among the goals are the following local goals pertaining to energy conservation: Goal ENV-1.3 Open Space and Renewable Energy Production; MOB-2.1 Vehicle Miles Traveled Reduction (City of Ukiah, 2022).

### Discussion:

**(a) Less than significant.** The Project's construction would consume energy in the form of diesel and gasoline fuels to power equipment and transport materials to the Project site. Operation and maintenance of the Project is not anticipated to increase consumption of diesel or gasoline fuel, compared to existing conditions. There would be a temporary increase in local truck trips during construction, primarily associated with export of debris from the Project site. However, this energy use would be limited to fuel required to transport materials, haul off debris, and power equipment for restoration of the Project site. No electrical infrastructure or lighting is proposed or required as part of the Project. Therefore, the Project would not increase energy use during operation and maintenance. Following construction, the park would be maintained in a manner consistent with existing conditions. Thus, energy use would not be wasteful, inefficient, or unnecessary for construction or operation of the Project. Impacts associated with temporary fuel use during construction of the Project would be less than significant.

**(b) No Impact.** Although the Project's construction would include the use of fuels to transport vehicles, materials, and equipment to the Great Redwood Trail, the Project would not interfere with or obstruct the implementation of City energy efficiency goals or policies as outlined in the City's general plan. The Project would utilize energy efficient vehicles, as feasible, for construction. No state plans regarding renewable energy would be applicable to the Project. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Under this criterion, there would be no impact.

**Mitigation Measures:** None

## 7. Geology and Soils

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

**Significance Criteria:** The Proposed Project would result in a significant impact to geological or soil resources if the Project exposed people or buildings to seismic risk; ruptured a known fault; produced strong seismic ground shaking, ground failure, liquefaction, landslides or substantial soil erosion; is located on expansive soil or unstable ground or create unstable ground; or destroyed a unique paleontological resource or geologic feature.

**Environmental Setting:** The Ukiah Valley is part of an active seismic region that contains the Mayacama Fault, which traverses the Valley in a generally northwest-southeast direction, approximately 0.8-mi east of the City limits at its closets point. The Ukiah Valley is located within the North Coast Range geologic province, comprised of a geologic feature unique to California, the Franciscan Formation. The Franciscan Formation is comprised of serpentinite, sandstone, and other sedimentary rocks. Based on California Geological Survey maps and the Background Report for the County of Mendocino General Plan Update (prepared by P.M.C., 2003), the City of Ukiah is outside of known areas of historic faults, Holocene Fault, Late Quaternary Fault and the Alquist-Priolo Earthquake Fault Zone. Because most of the lands within the City are generally flat, slope instability hazards are not a concern, with the exception of lands within the Western Hills.

Three soil types were mapped within the delineation study area based on the Natural Resources Conservation Service (NRCS) Web Soil Survey (2022). These are Cole loam, drained, 0 to 2 percent slopes; Russian loam, 0 to 2 percent slopes; and urban land. Cole loam, drained, 0 to 2 percent slopes is typically a very deep, somewhat poorly drained soil that occurs on alluvial plains and fans. It formed in recent alluvium derived primarily from sedimentary rock (USDA 1991). Russian loam, 0 to 2 percent slopes, is a very deep, well drained soils that occurs on flood plains and low stream terraces. It formed in alluvium derived primarily from sedimentary rock (USDA 1991). Urban land soils occur on terraces and alluvial plains in Ukiah. In the project area the urban land soils unit occurs in areas that have been altered by cutting and filling or grading, specifically for the construction of the railroad. Soils in the project area ranged from very gravelly loam to clay loam and are primarily urban land soils.

The City of Ukiah contains five geologic units: Quaternary alluvium, Quaternary terrace deposits, Plio-Pleistocene sedimentary rocks, Cretaceous marine sedimentary rocks, and the Franciscan Complex. Quaternary alluvium underlies the majority of the Planning Area and 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, and due to its Holocene age (e.g. within the past 11,700 years) is generally too young to preserve paleontological resources as fossils and therefore has a low paleontological sensitivity. However, Quaternary terrace deposits underlie portions of the Planning Area, which contain deposits of Pleistocene age (e.g. from around 2.58 million to 11,700 years ago) consisting of moderately to well-cemented, poorly sorted, silty or clayey sand and gravel. No significant fossil localities are known from Pleistocene alluvial deposits in either the City of Ukiah or the broader 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. Given the fossil-producing history of similar sediments in this region of California, Quaternary terrace deposits have high paleontological sensitivity.

## **Discussion:**

**(a-e) No Impact.** The Project site sits at approximately 597 feet in elevation and is relatively flat. According to the U.S. Department of Agriculture, Natural Resources Conservation Service’s Web Soil Survey, and the Aquatic Resources Report (Appendix B), the soils within the Project site are characterized as “210 Urban Land”, which is described as soils in highly populated areas containing largely built-out environments. In addition, according to the U.S. Geological Survey (USGS), the site is not susceptible to landslides, nor strong seismic ground shaking. There are no unique geologic features, and no unique paleontological features occur in the Project area. All development and construction for the Project will adhere to California Building Code requirements pertaining to erosion, soil stability and seismic regulations. (See Appendix D). For the above reasons, the Project would have no impact to geology and soils.

**(f) Less than Significant.** Ground disturbance in the areas demarcated for wetland grading and improvements underlain by Quaternary terrace deposits 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 this proposed goal and policies would reduce impacts, ground disturbing construction activities may impact paleontological resources if previously undisturbed, high-sensitivity Quaternary terrace elements are encountered below the surface. Consequently, damage to or destruction of fossils could occur due to wetland grading. As part of the project design (See Appendix D), mitigation has been incorporated to address this potential and reduce impacts to less than significant, including the following:

1. Should paleontological resources be identified at any project construction site, the Contractor shall cease operation within a 330-foot radius of the discovery and immediately notify the City. The City will provide a qualified paleontologist to provide an evaluation of the find and to prescribe mitigation measures to reduce impacts to a less-than-significant level. In considering any suggested mitigation proposed by the paleontologist, the City shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the discovery, project design, costs, land use assumptions, and other considerations. If avoidance is unnecessary or infeasible, other appropriate measures shall be instituted. Work may proceed on other parts of the project site while mitigation for paleontological resources is carried out.

**Mitigation Measures:** None

## 8. Greenhouse Gas Emissions

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

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

**Environmental Setting:** Climate change is caused by greenhouse gases (GHGs) emitted into the atmosphere around the world from a variety of sources, including the combustion of fuel for energy and transportation, cement manufacturing, and refrigerant emissions. GHGs are those gases that have the ability to trap heat in the atmosphere, a process that is analogous to the way a greenhouse traps heat. GHGs may be emitted as a result of human activities, as well as through natural processes. Increasing GHG concentrations in the atmosphere are leading to global climate change.

The state of California has adopted various administrative initiatives and legislation relating to climate change, much of which set aggressive goals for GHG emissions reductions statewide. Although lead agencies must evaluate climate change and GHG emissions of projects subject to CEQA, the CEQA Guidelines do not require or suggest specific methodologies for performing an assessment or specific thresholds of significance and do not specify GHG reduction mitigation measures. No state agency has developed binding regulations for analyzing GHG emissions, determining their significance, or mitigating significant effects in CEQA documents. Thus, lead agencies exercise their discretion in determining how to analyze GHGs. Because there are no adopted GHG thresholds applicable to the Project, and because the Project is considered “small scale,” meaning that it does not include new large buildings or components requiring significant construction that would result in increased GHGs, the below qualitative analysis is appropriate.

The Mendocino County Air Quality Management District (MCAQMD), under whose air quality jurisdiction the City of Ukiah lies, defers to the Bay Area Air Quality Management District (BAAQMD) guidelines for CEQA review of projects in Mendocino County. The BAAQMD adopted the *2017 Clean Air Plan* on April 19, 2017. 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), particulate matter (PM), and toxic air contaminants (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).



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.

#### **Discussion:**

##### **(a) Less than Significant.**

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. 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.

As described in 3. Air Quality, demolition activities requiring the use of heavy equipment, tools (mechanical ram, dump truck, excavator, pickup truck, backhoe, front end loader, bobcat & stinger for concrete demolition) and vehicle trips (construction workers, equipment transportation, and dump truck haul trips) could result in direct GHG emissions. Demolition activities including the use of diesel engine equipment would be subject MCAQMD/BAAQMD regulations intended to address air quality impacts and GHG emissions. With the temporary nature of demolition activities and adherence to the aforementioned regulations, impacts related to GHGs would be less than significant.

In addition, during operation the Project would help to achieve Ukiah 2040's Environment and Sustainability Element Goal, ENV-8 *To achieve carbon neutrality by or before the year 2045* and match up with the BAAQMD's 2017 Clean Air Plan, by promoting more sustainable means of transportation across the community reducing per capita vehicle miles traveled. In particular, the Clean Air Plan's Control Measure TR9 encourages planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities. The Project supports an efficient and safe bicycle and pedestrian system that would improve the connectivity and accessibility in the southern section of the City, and would fulfill a number of Ukiah 2040 General Plan Policies, namely:

- Policy ENV-7.2 which prioritizes pedestrian and bicycle access, infrastructure, and education to increase active transportation use.
- Goal LU-2 encouraging 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 calling for pedestrian access to commercial uses from residential areas.
- Goals MOB-1, MOB-2, and MOB-5, along with associated policies, which aim to create a more bikeable and walkable city. Specifically, 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.

**(b) Less than Significant.**

Pursuant to AB 32, CARB adopted the *Climate Change Scoping Plan* in January 2009 (reapproved by CARB on August 24, 2011) outlining measures to meet the GHG reduction goal to reduce emissions to 1990 levels by 2020 (CARB, 2009). The Scoping Plan is required by AB 32 to be updated at least every 5 years. On December 14, 2017, CARB approved the current Climate Change Scoping Plan, *California’s, 2017 Climate Change Scoping Plan* (2017 Scoping Plan Update). The 2017 Scoping Plan Update outlines the proposed framework of action for achieving the 2030 GHG target of 40 percent reduction in GHG emissions relative to 1990 levels. The 2017 Scoping Plan Update identifies key sectors of the implementation strategy, which includes improvements in low carbon energy, industry, transportation sustainability, natural and working lands, waste management, and water. CARB determined that the target statewide 2030 emissions limit is 260 million metric tons of CO<sub>2</sub>e (MMTCO<sub>2</sub>e) and that further commitments will be needed to achieve an additional reduction of 50 MMTCO<sub>2</sub>e beyond current policies and programs (CARB, 2017).

The 2017 Scoping Plan Update establishes the framework for achieving the 2030 statewide GHG reduction target of 40 percent below 1990 levels, established by SB 32. The plan update details local actions that land-use development projects and municipalities can implement to support the statewide goal. For project-level CEQA analyses, the 2017 Scoping Plan Update states that projects should implement feasible mitigation, preferably measures that can be implemented onsite.

CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of GHGs and describes the required contents of such a plan. As described below, the Project would be consistent with CARB’s 2017 Scoping Plan Update.

The 2017 Scoping Plan Update incorporates a broad array of regulations, policies, and state plans designed to reduce GHG emissions. Those that are applicable to the construction and operation of the proposed Project are listed in Table GHG-1. As shown below, the Project would be consistent with goals described in the Scoping Plan Update to reduce energy use and transportation emissions, consistent with statewide strategies and regulations. As a result, the proposed Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions; and the impact would be less than significant.

**Table GHG-1  
CONSISTENCY WITH APPLICABLE GREENHOUSE GAS REDUCTION ACTIONS IN 2017  
SCOPING PLAN UPDATE**

Strategy	Description	Consistency Analysis
AB 1493 (Pavley Regulations)	Reduces GHG emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model years, 2017–2025 (Phase II). Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020.	<b>Consistent.</b> The standards would apply to all vehicles used by construction workers and maintenance workers associated with the Project. The Project would be consistent with this regulation and would not conflict with implementation of the vehicle emissions standards.
Low Carbon Fuel Standard (Executive Order S-01-07)	Establishes protocols for measuring lifecycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	Consistent. The standards would apply to all vehicles used by construction workers and maintenance workers associated with the Project. The Project would be consistent with this regulation and would not conflict with

		implementation of the transportation fuel standards.
Advanced Clean Cars Program	In 2012, CARB adopted the Advanced Clean Cars (ACC) program to reduce criteria pollutants and GHG emissions for model year vehicles 2015 through 2025. ACC includes the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the ZeroEmission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.	<b>Consistent.</b> The standards would apply to all vehicles used by construction workers and maintenance workers associated with the Project. Therefore, the proposed project would be consistent with this regulation and would not conflict with implementation of the ACC program.

As discussed above, the Project would be consistent with the applicable strategies and policies included in the 2017 Scoping Plan Update. Therefore, the Project would not conflict with applicable plan, policies or regulations adopted for the purpose of reducing the emissions of greenhouse gases and the impact would be less than significant.

**Mitigation Measures:** None.

## 9. Hazards and Hazardous Materials

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

**Significance Criteria:** The Project would result in significant hazards or hazardous materials impacts if it exposed people to hazardous materials or placed them into hazardous situations; if it released hazardous materials or emissions into the environment or within 0.25 miles of a school; if it is located on a listed hazardous materials site; if it would create a hazard due to its proximity to a public airport or private airstrip; if it would create excessive noise for people in the area; if it would interfere with an emergency response or evacuation plan; or if it would expose people or structures to significant risks due to wildland fire.

**Environmental Setting:** The Safety Element of the City of Ukiah 2040 General Plan addresses a wide variety of approaches pertaining to hazard management and mitigation (City of Ukiah, 2022). Other regional hazards and hazardous materials guidance documents include, but are not limited to,

the Community Wildfire Protection Plan, Hazardous Waste Management Plan, Operational Area Emergency Plan, and the Mendocino County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), which was adopted by the County in December 2020 (Mendocino County, 2020). The MJHMP discusses prevalent hazards within the County; identifies risks to vulnerable assets, people, and property; and provides a strategy to achieve the greatest risk reduction based upon available resources. The four cities within Mendocino County, including the City of Ukiah, contributed to the MJHMP to individually assess hazards, explore hazard vulnerability, develop mitigation strategies, and create their own plan for each respective city. The Jurisdictional Annex to the MJHMP, was adopted by the City of Ukiah in 2020. Hazards identified for the City of Ukiah include earthquakes, wildfire, dam failure, flood, and pandemic (Mendocino County, 2020).

The City of Ukiah Emergency Operation Plan (May 2021) is designed to ensure continuity of operations and essential services, such as police, fire, utilities, and other day-to-day operations during and after an emergency or disaster. This plan was developed in consultation with the Ukiah Disaster Council it complies with all local ordinances, state law, and aligns with contemporary emergency planning guidance. This plan serves as the primary guide for reducing emergency and disaster risk within the City of Ukiah and establishes roles and procedures for deployment of the City's Emergency Operations Center. A current map of evacuation zones and routes is also maintained on the City of Ukiah's Office of Emergency Management webpage.

Mendocino Council of Governments (MCOG) prepared the Mendocino Evacuation Plan (July, 2020) that identifies evacuation routes within the County. This Plan describes existing conditions, access concerns, and strategies for managing evacuations which exceed the day-to-day capabilities of the various public safety agencies in Mendocino County. The City of Ukiah is identified as being located within "Planning Area 2" and "Zone 2f" of the Evacuation Plan. As noted in the plan, Highways 101 and 20 are identified as primary evacuation routes for the Ukiah area. The selection of specific (additional) evacuation routes (in effect during an emergency) will be done in the field at the Incident Command Post, according to the plan (MCOG, 2020).

The Ukiah Municipal Airport is located within the City of Ukiah jurisdictional limits. The Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP) was adopted by the Mendocino County Airport Land Use Commission on May 20, 2021 and adopted by the Ukiah City Council on June 16, 2021. The UKIALUCP identifies areas (known as "compatibility zones") with potential hazards and impacts to persons using or working within the vicinity of the airport.

Under Government Code Section 65962.5, both the State Water Resources Control Board (SWRCB) and the California Department of Toxic Substances Control (DTSC) are required to maintain databases of sites known to have hazardous substances present in the environment.

All lands within the City of Ukiah are within the jurisdiction of the Ukiah Valley Fire Authority. None of the lands within the City of Ukiah are located within a California Department of Forestry (CalFire) State Responsibility Area (SRA). However, some parcels within the western boundary of the City limits, are designated as "Very High" fire severity within the Local Responsibility Area (LRA). The Project site is not located within a High or Very High fire severity zone.

#### **Discussion:**

##### **(a-b) Less than Significant.**

Potentially hazardous substances may be used during construction of the project, including fuel, lubricant, and solvents for equipment. However, construction would be subject to implementation of appropriate BMPs to address the use and transport of hazardous materials and the potential discharge of contaminants. The Project's Special Provisions (Appendix D) incorporates by reference the

CalTrans Standard Specifications, in particular section 14-10 Solid Waste Disposal and Recycling (CalTrans, 2018 p. 230), which requires appropriate Best Management Practices (BMPs). Based on the implementation of these BMPs, impacts resulting from hazardous materials during construction are expected to be less than significant.

**(c) No Impact.**

The Project site is not within 0.25 mile of an existing or proposed school. The closest school is Ukiah Junior Academy, approximately 0.38 miles southwest of the Project site. The Project would not emit or handle hazardous materials, substances, or waste within 0.25 mile of a school. The City and its contractors would be required to comply with existing and future hazardous materials laws and regulations covering the transport, use, and disposal of hazardous materials, and because of the nature and quantity of the hazardous materials to be potentially used by the Project, the impact related to the use of hazardous materials during construction would have no impact.

**(d) Less than Significant with Mitigation.**

The Project is located along an industrial railroad corridor, which is known to include past use of heavy metals, creosote wood products, and other constituents associated with historical railroad activity and construction. Groundwater dewatering is generally not expected but may be required. Groundwater encountered during construction would be from shallow groundwater and not associated with a deeper aquifer. Outside of the Project Area but within the 1/8 mile buffer, there is at least one site classified with a hazard ranking

From the EnviroStor Database of the Department of Toxic Substances (DTSC), The Coast Wood Preserving Federal Super Fund site is located on approximately 8 acres on the southwest corner of Taylor Drive and Plant Road, adjacent to the southern terminus of the Project's railway corridor. In 1983 the US Environmental Protection Agency placed Coast Wood Preserving on the Superfund List. However, the DTSC has been the lead regulatory agency for the investigation and cleanup. The effects of an adjacent site's leaking of chromium into the soil and groundwater has the potential to cause a hazard during project grading and restoration activities.

The remedy for soil and groundwater contamination selected in DTSC's September 1989 Remedial Action Plan (RAP) and the United States Environmental Protection Agency's (US EPA) 1989 Record of Decision (ROD) included paving the site with an asphalt or concrete cap to prevent run-off and leaching of wood treatment solutions to the subsurface; installation of a down gradient slurry wall; groundwater extraction, treatment and reinjection; and soil excavation and off-site disposal after plant closure. Institutional controls were also implemented at the site through a Land Use Covenant between DTSC and CWP, which imposes a limitation on the site for non-residential use only.

In July 1999, DTSC approved with US EPA concurrence, an amendment to the 1989 RAP which changed the remedial action for groundwater from extraction and treatment to in situ reduction and fixation of hexavalent chromium via direct injection and infiltration of calcium polysulfide reductant. The RAP Amendment also included a provision for using the in-situ reduction and fixation for treating hexavalent chromium in soil. Remedial actions have continued by direct injection into the groundwater and infiltration of reductant with the use of infiltration trenches up gradient of the slurry wall. Infiltration of reductant occurred January of 2015 and February 2016. Hexavalent chromium and total chromium contamination in groundwater currently remain above their respective clean up levels in a few isolated areas, and have fluctuated in concentration during this review period, possibly associated with seasonal variation in groundwater levels. In December 2017, DTSC, US EPA, Coast Wood Preserving and Environmental Liability Transfer, Inc. (ELT) signed a Consent Decree for the transfer of cleanup responsibility to ELT. On June 8, 2018, Environmental Liability Transfer, Inc. (ELT) became the new owners of Coast Wood Preserving. In 2018, Coast Wood Preserving closed their operations and in

accordance of the Consent Decree, ELT began the process of completing the RAP implementation. Future work, as required by the RAP, includes soil investigation and soil removal. Groundwater monitoring will continue. (EnviroStor, 2019).

In order not to exacerbate existing contamination that may be present within the Project area, and mitigate risks to on-site personnel and the environment, **Mitigation Measures HAZ-1** would be implemented. This measure would reduce the impact of potential exposure from hazardous materials to construction workers, nearby receptors, and the environment to a less-than-significant level by conducting site investigatory soil pre-characterization for specific contaminants of concern (COCs), and requiring the proper handling and disposal of hazardous wastes per applicable local, state and federal regulations and/or guidelines. A Sampling Analysis Plan (SAP) shall be prepared to determine if specific COCs are present above regulatory thresholds. Once pre-characterization is complete and depending on the results of pre-characterization, a project-specific Soil and Groundwater Management Plan (SGMP) and/or a Soil Excavation, Stockpiling and Transportation Plan (SESTP) will be prepared. The purpose of the SGMP is to document, in accordance with best risk management practices, the general procedures for worker safety protocols, and for managing excavated soil and/or groundwater removed during construction.

**(e) Less than Significant.**

The Project is located within Airport Compatibility Zones 2 (Inner Approach/Departure Zone), 3 (Inner Turning Zone) and 5 (Sideline Zone) within the Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP). While overflights may be intrusive to some outdoor activities, these zones do not contain any regulations regarding intensity of use or other standards specific to airport safety concerns that would be applicable to the Project. According to Table 3A of the UKIALUCP, local parks are considered conditionally compatible in Zones 2 and 3 provided there are no permanent facilities where people congregate, and that residential intensity criteria is met. As the Project proposes no permanent structures, either residential or commercial, the Project's use in these areas is compatible. Those areas of the Project in Zone 5 are considered normally compatible. The Project would not result in a safety hazard or excessive noise related to airport operations for people working in the Project area. Impacts would be less than significant.

**(f) Less than Significant.**

The primary routes for evacuation from the City of Ukiah are identified as Highways 101 and 20, as these routes are well maintained and have adequate carrying capacity for evacuation purposes (MCOG, 2020). Although there are no specific evacuation routes discussed in either the Mendocino County Emergency Operations Plan, Mendocino County Multi-Hazard Mitigation Plan, nor the City of Ukiah's jurisdictional annex to the Multi-Hazard Mitigation Plan (Mendocino County, 2016; 2020), Highway 101 is identified as a primary route in the (recently completed) Mendocino County Evacuation Plan (MCOG, 2020). The proposed Project trail alignment would be adjacent to existing streets, not considered major roadways in the City of Ukiah. Emergency access to the Project Area already exists from these streets and would continue to exist under the proposed Project during both construction and operation. Operation and maintenance of the Project would not result in substantial additional daily traffic from maintenance activities or truck trips along local roadways, and would, therefore, not affect emergency services or response times in the area. Additionally, no roadway closures are proposed during construction, nor during normal operation of the Project. A less than significant effect on emergency access would result.

**(g) Less than Significant.**

Based on mapping by the California Department of Forestry and Fire Protection (CAL FIRE) Forest Resource Assessment Program (FRAP) the Project site is not within a Very High Fire Hazard Severity Zone (CAL FIRE, 2007). The use of construction equipment and the possible temporary on-site

storage of fuels and/or other flammable construction chemicals could pose an increased fire risk resulting in injury to workers or the public during construction. However, contractors would be required to comply with hazardous materials storage and fire protection regulations, which would minimize potential for fire creation, and ensure that the risk of wildland fires during construction would be less than significant.

## **Mitigation Measures:**

### **HAZ-1: Sampling Analysis Plan**

Mitigation Measure HAZ-1 would reduce the impact of potential exposure from potential hazardous materials to construction workers, nearby receptors, and the environment to a less-than-significant level by conducting site investigatory soil pre-characterization for specific contaminants of concern (COCs) and requiring the proper handling and disposal of hazardous wastes per applicable local, state and federal regulations and/or guidelines. A Sampling Analysis Plan (SAP) shall be prepared to determine if specific COCs are present above regulatory thresholds in disturbed areas near the proposed terminus of the trail at Plant Road. Once pre-characterization is complete and depending on the results of pre-characterization, a project-specific Soil and Groundwater Management Plan (SGMP) and/or a Soil Excavation, Stockpiling and Transportation Plan (SESTP) will be prepared, if determined necessary. The purpose of the SGMP is to document, in accordance with best risk management practices, the general procedures for worker safety protocols, and for managing excavated soil and/or groundwater removed during construction. The SGMP and/or SESTP shall address specific training requirements for soil and groundwater management, materials handling, dewatering, soil stockpiling, transportation, and disposal procedures.

1. A Sampling Analysis Plan (SAP) shall be prepared by the City or its contractor to define sample locations, boring depths based upon design, estimated soil volumes, and number of borings to adequately pre-characterization project alignment soils and/or groundwater. The SAP shall include precharacterization of soil and groundwater for potential constituents of concern (COCs) and shall include an assessment of CAM-17 metals and petroleum hydrocarbons prior to initiating construction activities. The SAP shall further include specifications for surficial samples that will be collected to the proposed depth of excavation in the areas where ground disturbing activities are proposed.
2. Prior to construction of the Project, limited pre-characterization shall be conducted at SAP identified locations in proximity to the Coast Wood Preserving Federal Super Fund Site where ground disturbance is expected to occur adjacent to Plant Road in conjunction with the project.
3. If pre-characterization analysis results determine COCs above regulatory background thresholds for human and environmental health exposure, then a site-specific Soil and Groundwater Management (SGMP) shall be prepared to address proper handling of potentially impacted soil and groundwater prior to waste stream characterization, proper disposal, and handling requirements for worker protection. The SGMP shall proactively plan for and manage potentially encountered hazardous materials affected soils, and to provide special soil and groundwater handling and stockpiling details throughout the Project Area construction areas for worker protection, final waste disposal purposes and to mitigate potential project construction delays. Key elements of the SGMP will include management options for excavated soils, waste characterization options for excavated soils, areas of impact soil and or groundwater, sampling strategy for stockpiled soils, special handling requirements, record keeping, and HAZWOPER training. The SGMP shall indicate the specific level of protection required for construction workers and include preparation of a site-specific health and safety plan in accordance with federal OSHA regulations (29 CFR 1910.120) and Cal-OSHA



regulations (8 CCR Title 8, Section 5192) to address worker health and safety issues during construction.

4. Where Project construction design proposes to include demolition or deconstruction of existing structures (bridges), subsequent pre-demolition hazard materials sampling shall occur for asbestos and lead at locations where structural demolition would occur.
5. If required, a Soil Excavation, Stockpiling and Transportation Plan (SESTP) shall be prepared once the areas of Project ground disturbance are confirmed and prior to construction. The SESTP will specify measures to appropriately manage soil spills during Project construction for waste characterization, worker protection, fugitive emissions control and disposal. Alternatively, soil spoils can be initially field screened (visual, olfactory, photo-ionization detector, etc.) and stockpiled, then subsequently characterized for appropriate disposal methods according to applicable waste facility requirements.
6. If construction activities include dewatering, and if laboratory analysis of pre-construction soil borings indicate elevated total and Soluble Threshold Limit Concentration (STLC) concentrations of 1,000 ppm and 5 mg/L, respectively, then dewatered groundwater will be stored in tanks, and characterized for waste disposal or permitted for treatment and discharge to sanitary sewer, storm drain, or land. - All potentially contaminated materials encountered during Project construction activities shall be evaluated in the context of applicable local, state and federal regulations and/or guidelines governing hazardous waste. All materials deemed to be hazardous shall be remediated and/or disposed of following applicable regulatory agency regulations and/or guidelines. Disposal sites for both remediated and non-remediated soils shall be identified prior to beginning construction. Management of these sites shall be documented in a Material Management Plan acceptable to applicable agencies. All evaluation, remediation, treatment, and/or disposal of hazardous waste shall be supervised and documented by qualified hazardous waste personnel.

With the incorporation of Mitigation Measure HAZ-1, the potential impact to construction workers, nearby receptors, or the environment would be less than significant.

## 10. Hydrology and Water Quality

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

**Significance Criteria:** The Project would significantly impact hydrology and water quality if it violated water quality standards or waste discharge requirements or substantially degraded surface or groundwater quality; substantially decreased groundwater supplies or impeded sustainable groundwater management; altered drainage patterns in a manner that would cause substantial on- or off-site erosion, polluted runoff or excessive runoff that caused flooding; impeded or redirected flood flows; risked a release of pollutants due to inundation if in a flood hazard, tsunami or seiche zone; or conflicted with a water quality plan or sustainable groundwater management plan.

**Environmental Setting:** Average rainfall in Ukiah is slightly less than 35 inches. Most of the precipitation falls during the winter. Rainfall is often from brief, intense storms, which move in from the northwest. Virtually no rainfall occurs during the summer months. Surface water supplies for the Ukiah

Valley include the Eel River, from which water is diverted into the Russian River watershed through the Potter Valley Project, Lake Mendocino, and the Russian River. Groundwater is drawn from the Ukiah Valley groundwater basin. The Ukiah Valley groundwater basin is the northernmost basin in the Russian River water system and underlies an area of approximately 60 square miles. Water enters the groundwater system via percolation of surface waters and through the soil. The creeks and streams in the Ukiah Valley provide drainage channels for groundwater recharge, as well as domestic and agricultural water supply.

As discussed under 3. Biological Resources, there are four mapped wetlands in the Project area. Full descriptions of these features may be found within Appendix B Aquatic Resource Report. Wetland Area A is approximately 9,351 sf and is located south of Plant Road. This is a seasonal wetland that is drier in the southern portion and then becomes more wetland as it goes north with saturated soils, algal matting and obligate wetland plants defining this area. The wetland ends at a change in elevation from a long, linear ditch feature to an upland “berm”. Drainage D1 is rock lined with little to no soil development. Drainage D2 contains a total area of 639 sf within the Aquatic Resources Report (Appendix B) study area. The drainage has been altered and disturbed by both the railroad and Highway 101. Wetland Area B is a small 109 sf seasonal wetland dominated by FAC species such as Himalayan blackberry and ryegrass. Refer to photo 6 for this feature. Wetland Area C is also a seasonal wetland, extending approximately 2,489 sf within the Aquatic Resources Report study area. Water for this area comes from culverts under the railroad tracks. This site is dominated by Himalayan blackberry and Harding grass.

Wetland Area D is approximately 6,502 sf within the study area and is dominated by iris-leaved rush, which is an obligate wetland plant. There were also some willows in the area. This area has been disturbed by homeless encampments and includes a lot of human trash.

In addition, on March 10, 2023, the Project received a North Coast Regional Water Quality Control Board (NCRWQCB) water quality certification (Certification) that identified total permanent impacts to approximately 0.15 acres/49 Linear Feet of waters of the state, including 0.127 acres of wetlands (Wetland C and Wetland D), 0.017 stream channels (D3, D4, D5) and 0.023 acres of riparian areas. (See Appendix E NCRWQCB Water Quality Certification). This report requires mitigation for these impacts that are outlined at the end of Appendix E and entitled “Attachment 2 Avoidance and Minimization Measures.” Updated avoidance and minimization measures are provided in Appendix G, as allowed under Project-Specific Condition 1. Of the NCRWQCB Water Quality Certification. These measures have been integrated as mitigation under BIO-2.

## **Discussion:**

### **(a) Less than Significant with Mitigation**

The Project would include soil disturbing activities such as grading and site contouring, which have the potential to mobilize sediment, silt, and other contaminants through runoff. As construction of the Project would disturb more than 1 acre of soil, compliance with the General Permit for Stormwater Discharges Associated with Construction Activity, Order No. 2009-0009-DWQ (commonly referred to as the Construction General Permit) is required (See Appendix E). Construction activity subject to this permit includes clearing, grading, and ground disturbances such as stockpiling or excavation. The Construction General Permit requires the development of a Stormwater Pollution Prevention Plan (SWPPP) including specific measures to control erosion and limit contamination of ground and surface waters.

The Project’s ground disturbance in the absence of measures to protect riparian vegetation may result in erosional flow towards the Russian River and adjacent wetlands, potentially contributing to sediment into the river. To reduce potential effects **Mitigation Measure BIO-2**, would be implemented to ensure

that regulatory requirements consistent with the terms of the Construction General Permit, SWPPP, general wetland avoidance measures, and stormwater BMPs would control and limit runoff from the Project site, consistent with water quality standards. To ensure that ground disturbance does not result in conditions of runoff on or off site and that habitats are protected, **Mitigation Measure BIO-1** (described in Section 4, Biological Resources) would also be implemented. These measures would limit disturbance of existing wetlands and riparian woodlands and prevent the Project from contributing to the siltation of the Russian River and adjacent wetlands.

As discussed in Section 9, Hazards and Hazardous Materials, there are existing hazards in proximity to the site which could contaminate ground or surface water quality during construction ground disturbing activities, such as excavation and movement of soils. **Mitigation Measure HAZ-1** would be implemented to reduce potential impacts. This measure would require soil, groundwater, and asbestos investigations and the proper handling and disposal of hazardous wastes per applicable local, state and federal regulations and/or guidelines. Impacts associated with the Project's construction would be less than significant with mitigation implemented. (Refer to Section 9 for the text of Mitigation Measure HAZ-1).

Following construction, the City of Ukiah would be responsible for maintaining the revegetation and managing the Great Redwood Trail in a manner that would provide for ongoing protection of water quality. Water quality impacts during operation and maintenance of the Project would be less than significant.

**(b, e) No Impact.**

The Project would not utilize groundwater resources during construction or operation but will instead utilize water provided by connections to the Willow County Water District. In excavating waste piles of concrete and other debris, and restoring associated wetlands, the Project improves conditions for groundwater recharge in the project area.

**(c.i) Less than Significant with Mitigation.**

The Project includes extensive alteration of drainage patterns for the purpose of recontouring the site and restoring wetland habitat areas within and adjacent to the rail corridor. The proposed design for the Project does not include the extensive addition of impervious surface areas. Construction would require implementation of a SWPPP which would include measures to minimize erosion and control runoff on and off-site. Resource avoidance measures, as described in Appendix G, include flagging or fencing of wetlands to prevent contamination of wetlands during construction. To ensure that appropriate measures to limit runoff are taken prior to and during construction including preparation of a SWPPP and an erosion and sediment control plan, **Mitigation Measure BIO-2**, would be implemented.

With adherence to stormwater and associated water quality regulatory requirements and implementation of Mitigation Measure BIO-1 outlining basic requirements of the SWPPP and erosion control plan to be prepared for the Project, erosion and sedimentation/siltation would be controlled during construction. Impacts would, therefore, be less than significant with mitigation.

**(c.ii) Less than Significant.**

The project may increase the rate or amount of surface runoff due to additional impervious surface area from the paved concrete walkway. BMPs implemented during construction (See Appendix D) would serve to minimize stormwater runoff impacts, and the construction of the culvert extensions would minimize post-construction stormwater runoff impacts. In addition, the Project addresses existing drainage issues through removal of concrete rubble and relic debris to allow for the enhancement of seasonal (existing and constructed) wetlands.

**(c.iii) Less than Significant with Mitigation.**

The Project design would allow for appropriate drainage to facilitate wetland restoration as discussed in the Project's Plans and Special Provisions (Appendices A and D). Although extensive grading and recontouring of the site would be implemented, such work would be subject to the City of Ukiah's design standards and erosion and sediment control requirements. Consistent with these standards, measures will be taken to minimize or otherwise limit runoff during construction, subject to City engineering review and approval. Site soils would be stabilized and revegetated following disturbance. With implementation of **Mitigation Measure BIO-2** ensuring development of a SWPPP required for the construction general permit, impacts would be reduced to less-than-significant levels.

**(c.iv) Less than Significant.**

The Project meanders in and out of FEMA mapped areas with a 0.2% and 1% annual chance of a flood hazard, and areas with reduced risk of flooding due to levees (FEMA, 2024). BMPs implemented during construction (See Appendix D) and the construction of the culvert extensions would ensure that flood flows are not impeded or redirected into the surrounding site. Through the removal of relic debris from the Project site and restoration of the wetland areas within the Project site, the proposed Project, as implemented, would result in improved conditions for the functionality of flood flows.

**d) Less than Significant with Mitigation.**

The Project site is not located in the coastal zone or in a tsunami inundation zone. The wetlands and drainages adjacent to the site are not large enough or deep enough to produce a seiche. Therefore, there is no risk for release of pollutants associated with these hazards for the site and surroundings.

The Project is within FEMA mapped areas subject to periodic inundation. Under existing conditions there is potential for release of contaminants during inundation. Proposed soil excavation and movement could increase the risk of contamination. Therefore, measures to reduce this risk would be needed during construction of the Project.

Implementation of **Mitigation Measure BIO-2** would ensure compliance with water quality requirements including preparation of a SWPPP. **Mitigation Measure HAZ-1** would be implemented to ensure that potential hazards are identified and safely removed from the site, thereby limiting contamination of surface and groundwaters. Impacts would be less than significant with mitigation measures implemented.

**Mitigation Measures:**

**BIO-1, BIO-2, BIO-3, HAZ-1**

## 11. Land Use and Planning

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

**Significance Criteria:** The Project would significantly impact land use if it physically divided an established community or conflicted with a land use plan, policy or regulation intended to avoid or mitigate an environmental impact, such as the general plan or zoning code.

**Environmental Setting:** The City of Ukiah includes contiguous lands at the city center, as well as lands owned and managed by the city for a total of approximately 4.72 square miles of incorporated area. Ukiah serves as the County Seat of Mendocino County, as well as the county’s main commercial hub. Zoning and land uses are governed by the City’s Zoning Ordinance, as outlined in Division 9, Chapter 2 of the Ukiah City Code. Predominant land uses in the City include single family residential, multi-family residential, and commercial uses ranging from local commercial to heavy commercial, as well as manufacturing, industrial, agricultural, and public facilities. The City’s 2040 General Plan was adopted by City Council on December 7, 2022, and contains the following goals and policies that are applicable to the Project (City of Ukiah, 2022).

### **Public Facilities, Services, and Infrastructure Element**

**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.*

### **Environment and Sustainability Element**

**Goal ENV-5: To ensure the health and viability of the Russian River and its 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-5.3: 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-6.2: 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. (Source: New Policy)*

*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. (Source: New Policy)*

*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. (Source: New Policy)*

*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. (Source: Existing Programs OC-7.5(a), OC-9.2d, OC-9.2e, modified)*

*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. (Source: New Policy).*

*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*

**Land Use Element**

*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.*

**Discussion:**

**(a-b) No impact.** The Project would consist of restoration and enhancement of a designated public park/recreational facility, with no change of use or other alteration that would physically divide an established community; therefore, there would be no impact under this criterion. The proposed Project would be located within the existing railroad right of way and is not zoned. The Project does not conflict

with the City’s General Plan and is specifically supported in and is consistent with the elements noted above. Since the rail corridor already exists and has historically acted as a divider in the community, converting a portion of the corridor into a bike path would not introduce a new division. Instead, it could enhance connectivity within the city by providing a safe, alternative route for pedestrians and cyclists, potentially bridging gaps between neighborhoods and other community areas where trail segments already exist. Therefore, the project is unlikely to further divide an established community. In fact, it may help to integrate different parts of the city by creating new, accessible connection.

**Mitigation Measures:** None

## 12. Mineral Resources

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

**Significance Criteria:** Impacts to mineral resources would be considered significant if the proposed Project were to result in the loss of a known mineral resource that has value to the region and state or is otherwise locally important as designated on a local land use plan.

**Environmental Setting:** The Surface Mining and Reclamation Act of 1975 (SMARA) requires Geologists of the State to classify lands into Mineral Resource Zone (MRZ) categories based on the known or inferred mineral resource potential of that land. The mineral resource land classification supports the protection and wise development of California’s mineral resources (California Department of Conservation, 2019).

Aggregate resource minerals, primarily sand and gravel, found along many rivers and streams in Mendocino County is considered the most prominent mineral resource found in the county, including along the Great Redwood Trail.

### Discussion:

**(a-b) No impact.** According to the California Geological Survey, the land within the Project Site is not assigned as an MRZ indicating a low potential for the presence of valuable mineral resources based on the site geography (California Department of Conservation, 2020.) The United States Geological Survey (USGS) Mineral Resources Data System also indicates no mineral resources within the Project site (USGS, 2020). The City’s 2040 General Plan does not indicate the presence of mineral resources, nor an important mineral resource recovery site within the Project site (City of Ukiah, 2022). Therefore, the Project would not result in the loss of mineral resources or a mineral resource recovery site. Under these criteria, there would be no impact.



**Mitigation Measures:** None

### 13. Noise

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

**Significance Criteria:** The Project would have a significant impact if it temporarily or permanently exceeded local noise standards in the vicinity of the Project, generated excessive ground borne noise or vibration; or would expose people residing or working in the area to excessive noise levels from public airports or private airstrips.

**Environmental Setting:** The Ukiah City Code’s Noise Ordinance (Division 7, Chapter 1, Article 6) establishes ambient base noise level standards, ranging from 40 to 70 decibels, that apply to specific zoning districts within the City of Ukiah. “Ambient noise” is the all-encompassing noise associated with a given environment, being usually a composite of sounds from many sources near and far. These are specific to operation (not construction). For the purpose of the Noise Ordinance, ambient noise level is the level obtained when the noise level is averaged over a period of fifteen (15) minutes without inclusion of noise from isolated identifiable sources, at the location and time of day near that at which a comparison is to be made. Land uses exceeding these standards for long periods of time are considered to be significant.

Project construction can also generate varying degrees of noise and ground borne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates noise and vibration that spreads through the atmosphere and ground and diminishes in amplitude with distance from the source. While the Ukiah City Code (UCC) does not contain thresholds for analyzing noise impacts from construction-related noise, UCC §6054 *Construction of Buildings and Projects* states that it shall be unlawful for any person within a residential zone, or within a radius of five hundred feet (500’) therefrom, to operate equipment or perform any outside construction or repair work on buildings, buildings or projects or to operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist or any other construction type device (between

the hours of 7:00 p.m. of one day and 7:00 a.m. of the next day) in such a manner that a reasonable person of normal sensitiveness residing in the area is caused discomfort or annoyance unless beforehand a permit therefor has been duly obtained from the Director of Public works.

In addition, guidance documents from the Federal Highway Administration and the Federal Highway Administration provide information on maximum noise and vibration levels associated with construction equipment and thresholds of significance for analyzing such impacts.

**Discussion:**

**(a) Less than Significant.**

From the Project's Special Provisions for Great Redwood Trail Phase 4 Specification No. 21-02 (Appendix D), construction activities would generally occur between the hours of 7:00 a.m. and 7:00 p.m. as prescribed by UCC §6054. Project design incorporates policies that will minimize the results of constructions noise, operations not exceeding 86dB at a distance of 50 feet from the noise source. In addition, the Project will locate all stationary noise generating construction equipment such as air compressors and generators as far as practical from the nearby residences. Unnecessary idling of internal combustion engines will also be prohibited. Once operational, the Project would not include any stationary noise sources. Maintenance would consist of regular checks on the erosion control devices and irrigation systems, mowing upland areas, tree trimming, trash removal, weed control, plant viability monitoring, and overall site good housekeeping measures. The Project would not generate a substantial permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the Ukiah City Code's Noise Ordinance. This impact would be less than significant.

**(b) Less than Significant.**

Construction activity can result in varying degrees of ground-borne vibration, depending on the type of soil, equipment, and methods employed. Operation of construction equipment can cause ground vibrations that spread through the ground and diminish in strength with distance. Buildings on the soil near the construction site respond to these vibrations with varying results, ranging from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibrations at moderate levels, and slight damage at the highest levels. While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration.

Construction activities may generate perceptible vibration while impact equipment or heavy earth moving equipment are in use. Equipment expected to be used for Project construction, as shown in Table NOI-1, do not include any high vibration generating equipment such as pile drivers, drill rigs or vibratory compactors. The Federal Transit Administration's *Transit Noise and Vibration Impact Assessment Manual* identifies 0.2 inches per second peak particle velocity (in/sec PPV) as the level at which potential damage could result to non-engineered timber and masonry buildings. Additionally, Caltrans identifies 0.24 in/sec PPV as the level at which vibration is distinctly perceivable to humans. Based on ground-borne vibration levels for standard types of construction equipment provided by the FTA, of the equipment proposed to be used for Project construction, the use of the stinger jack hammer would be expected to generate the highest vibration levels (typically 0.035 in/sec PPV at a distance of 25 feet). Since the operation of equipment would produce vibration levels below the aforementioned thresholds, the Project would not result in significant ground borne vibration, and impacts would be less than significant.

**Table NOI-1  
TYPICAL NOISE LEVELS FROM CONSTRUCTION EQUIPMENT**

<b>Type of Equipment</b>	<b>L<sub>max</sub> at 50 feet, dBA</b>	<b>Acoustical Usage factor (%)</b>
Backhoe	54	40
Dozer	180	40
Dump Truck	76	40
Excavator	81	40
Front End Loader	79	40
Grader	85	40
Pickup Truck	75	40
Roller	80	20

SOURCE: FHWA, 2017

Once operational, the Project would not include any new sources of vibration. Therefore, the Project would have no operational impacts with regard to ground-borne vibration.

**(c) Less than Significant.** A portion of the Project is in proximity to the Ukiah Municipal Airport, and the Project is located within Airport Compatibility Zones 2 (Inner Approach/Departure Zone), 3 (Inner Turning Zone) and 5 (Sideline Zone) within the Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUC). The airport serves as a CalFire Air Attack Base. Throughout fire season, CalFire uses the airport to assist in battling wild and forest fires in the region. The airport is also used for flight training in the area, which is most active during the summer months. This UKIALUCP takes into account potential long-term growth in airport activity as well as the noise impacts associated with busy fire attack aircraft activity. Noises in associated compatibility zones are typically above 55dB, with areas of the Project in Zone 2 consistently above 60dB. Outdoor Non-Group Recreation is considered a Normally Compatible or Conditionally Compatible Land Use, and the trail itself could also be considered a 'Transportation Route' which is similarly considered as a Normally Compatible or Conditionally Compatible Land Use.

**Mitigation Measures:** None

## 14. Population and Housing

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

**Significance Criteria:** The proposed Project would result in significant impacts to the local population or housing stock if it directly or indirectly induced substantial unplanned population growth or displaced a substantial number of people or housing such that the construction of replacement housing would be required.

**Environmental Setting:** The City of Ukiah is approximately 4.72 square miles in size and located within Mendocino County. Overall, the City of Ukiah's population has increased moderately over the past nearly 30 years, with a more accelerated increase in the last five years. Projections from the California State University Chico Center for Economic Development - Mendocino County Economic/Demographic Profile show this trend continuing. As described in the City's Housing Element (2019) of the General Plan, the City's annual growth rate between 1990 and 2018 averaged approximately 0.3%. Between 2000 and 2010, the City added 545 residents, or 3.7%, to its population. According to the California Department of Finance, the population in the County of Mendocino was 59,985 in 2018 and 16,226 in the City of Ukiah. The 2020 Census data identifies the City of Ukiah population as 16,607.

### Discussion:

**(a) No Impact.** In general, a project would be considered growth-inducing if its implementation would result in substantial population increases and/or new development that would not otherwise occur in the absence of that project. The Project does not include inhabitable structures, such as housing or businesses. Nor would the Project result in permanent employment opportunities that could indirectly induce population growth. The Project's construction and associated restoration efforts would be likely to require a small, temporary workforce, which is expected to be drawn from the local labor pool or from neighboring counties. Although the Project may enhance the public enjoyment or use of the trail the Project would not lead to substantial increased population. There would be no impact associated with population growth.

**(b) No impact.** The Project would not displace any existing housing or remove residents. Therefore, no replacement housing would be required to be constructed elsewhere and no impact would occur under this criterion.

**Mitigation Measures:** None

## 15. Public Services

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

**Significance Criteria:** The Project would result in a significant impact to public services if it resulted in a requirement for increased or expanded public service facilities or staffing, including fire or police protection, schools and parks.

**Environmental Setting:** Police protection services for the entire City limits is provided by the Ukiah Police Department, while the Mendocino County Sheriff's Department provides police services for areas outside of the City limits. Fire protection services in the City are provided by the Ukiah Valley Fire Authority. Educational facilities in the City are provided by the Ukiah Unified School District (UUSD) and County Office of Education. Additionally, there are several private and charter schools serving residents within the City of Ukiah. As mentioned below in Section 16, *Recreation*, of this Initial Study, there are 13 City parks, a municipal golf course, and a skate park managed by the City of Ukiah, as well as other recreational facilities in the area.

### Discussion:

#### (a.i) No Impact.

The City of Ukiah Fire Department and Ukiah Valley Fire District are two departments that work as one, referred to as Ukiah Valley Fire Authority, maintaining comprehensive coverage for the City and the surrounding Ukiah Valley (City of Ukiah, 2020). The Ukiah Valley Fire District is located within 1 mile of the Project site. The Project would not result in an increase in population or the construction of facilities that would increase demand for fire protection services or impact service ratios, such that new fire protection facilities would be required to be constructed. The Project's construction and operation would not result in a substantial increase in demand for fire protection services that could not be met by existing local service systems. Therefore, no impact would occur under this criterion.

**(a.ii) No Impact.**

The City of Ukiah’s Police Department provides law enforcement services to the City of Ukiah. The department’s communications center handles all 9-1-1 calls and non-emergency calls for both the City of Ukiah and City of Fort Bragg police departments. Ukiah’s Police Department is located at 300 Seminary Avenue, approximately 1.6 miles northwest of the Project site. Construction and maintenance of the Project would not result in an increase in demand for police protection or impact service ratios that could not be met by existing local public service providers. As a non-motorized transportation facility, the Project would not necessitate any related new or altered public service facilities. The Project would solely be used for recreational purposes. The Project would facilitate an increase in bicycle, foot, and other non-motorized travel. The Project is not expected to substantially increase the need for patrols by local law enforcement or emergency services. The Project may ultimately have the beneficial effect of reducing the need for patrol by encouraging more formalized and regulated public use and discouraging existing transient activity in the area. Therefore, no impact would occur under this criterion. The trail would be included as a public area monitored by Ukiah Police Department within the City limits and by Mendocino County Sheriff’s Office deputies on unincorporated portions of the trail.

**(a.iii) No Impact.**

The Ukiah Unified School District serves the City of Ukiah. There are 14 schools servicing grades preschool through High School within the District. As described in Section 2.2.14, Population and Housing, the Project would not result in an increase in housing or population. Therefore, the Project would not generate an increase in demand for local school facilities. No impact would occur under this criterion.

**(a.iv) Less Than Significant**

As described in 14, *Population and Housing*, the Project is not expected to result in a temporary or permanent increase of local population. Thus, existing parks or other public facilities would not be impacted and a need for additional parks or public facilities would not be necessary. Although improvements of the trail may attract a slight increase in visitors following construction, that potential increase would be considered a less than significant impact. Operationally, maintenance of the trail is within the City’s existing capacity and already undertaken across existing segments.

**(a.v) No Impact**

The Project would not include any residential development or otherwise increase the local population such that the provision of additional public facilities would be needed. Therefore, there would be no impact pertaining to the construction of such facilities associated with the proposed Project.

**Mitigation Measures:** None

## 16. Recreation

RECREATION				
	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Significance Criteria:** Impacts to recreation would be significant if the Project resulted in increased use of existing parks or recreational facilities to the extent that substantial deterioration was accelerated or if the Project involved the development or expansion of recreational facilities that would have an adverse effect on the physical environment.

**Environmental Setting:** The City maintains a wide variety of park and building facilities to meet the needs of the community. Most parks are open daily to the public between the hours of 6:00 a.m. and 10:00 p.m. Many facilities may also be reserved for a low rental fee. Rental operations include picnic and barbecue facilities, conference and meeting rooms, banquets and wedding facilities, a board room and auditorium, sports stadium and complex, swimming pool, amphitheaters, covered gazebo, and a pavilion. The Project is a park/recreation facility as defined under UCC §1965 and includes all that real property designated in the license agreement between the City of Ukiah and the now named Great Redwood Trail Authority (formerly the North Coast Rail Authority), which includes the entire rail corridor within the City limits. The license agreement also allows the City to develop the railway corridor until the south end of Taylor Drive, bordering properties within the County of Mendocino jurisdiction, and terminating at Plant Road. Former completed phases of the Great Redwood Trail running through the City of Ukiah are currently used by pedestrians, joggers and cyclists for exercise and recreation, and by office professionals on a lunchtime stroll.

**Discussion:**

**(a) No impact.** The Project proposes a new recreational amenity within the City of Ukiah and an unincorporated area of Mendocino County. As stated in 14, *Population and Housing*, the Project would not introduce a new population or induce growth such that substantial deterioration would occur to existing recreational facilities in Ukiah. However, The Project would enhance the recreational experience for residents of the surrounding communities and contribute to the use of an existing recreational facility. The Project would include enhancement of the Great Redwood Trail - Ukiah and support environmental education through native riparian plantings and placement of interpretive signage. Therefore, following construction, the Project would benefit existing neighborhoods and deter potential overuse of other existing and nearby parks. The proposed trail is a recreational facility that could encourage the construction of other facilities, predominantly other connecting trails or related amenities. Such future projects would be subject to CEQA review and other environmental approvals, as applicable, once proposed. There would be no adverse impact under this criterion.

**(b) Less than Significant.**

As discussed above, the Project would qualitatively enhance the existing Great Redwood Trail – Ukiah recreational facility. Following construction, operation of the Project would improve recreational resources along with improved site drainage, water quality, wetland habitat, riparian and native vegetation and would not generate long-term adverse physical effects to the environment. Therefore, the impact associated with construction would be temporary and less than significant.

**Mitigation Measures:** None



## 17. Transportation

TRANSPORTATION				
Would the project:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b), Criteria for Analyzing Traffic Impacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Significance Criteria:** Impacts to transportation and traffic would be significant if the Project conflicted with a local plan, ordinance or policy addressing transit, roadway, bicycle and pedestrian facilities; conflicted with CEQA Guidelines Sec. 15064.3(b), which contains criteria for analyzing transportation impacts; substantially increased hazards due to geometric design features; or resulted in inadequate emergency access.

The City of Ukiah's 2040 General Plan contains a number of goals, policies, and implementation programs pertaining to the circulation and transportation system. Specifically, 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. The 2040 General Plan increases the 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 (City of Ukiah, 2022).

Additionally, the following local plans have historically addressed transportation issues within the City of Ukiah: 2017 Ukiah Bicycle and Pedestrian Master Plan, City of Ukiah Safe Routes to School Plan (2014), Mendocino County Rail Trail Plan (2012), the Ukiah Downtown Streetscape Improvement Plan (2009), MCOG's Regional Transportation Plan (RTP) and Active Transportation Plan (ATP) (adopted in 2022) and Section 5, Circulation and Transportation, of the Ukiah Valley Area Plan (2011) addresses transportation within the larger Ukiah Valley.

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.

Per CEQA Guidelines Section 15064.3, vehicle miles traveled (VMT) for land use projects exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. In addition, projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

On April 17, 2024, the Ukiah City Council adopted a resolution on measuring potential impacts for VMT which aligns with Ukiah 2040's General Plan Mobility Element Goal MOB-2 *To reduce vehicle miles traveled (VMT) to and from residences, jobs and commercial uses in Ukiah*; General Plan Policy MOB-2.1-*Reduce vehicle miles traveled (VMT) to and from residences, jobs and commercial uses in Ukiah*; and Environment and Sustainability Element, General Plan Goal ENV-8-*To achieve carbon neutrality by or before the year 2045*. The VMT threshold screening criteria described in the resolution exempts the Project from a quantitative VMT analysis, as it falls within the category of a *Transportation Project* defined as "Roadway, transit, bicycle, and pedestrian projects that do not lead to a measurable increase in vehicle travel."

Even so, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. Such qualitative analysis of construction traffic utilizing guidance from the Office of Planning and Research (OPR) will be applied below to Project impacts.

In 2018, the OPR published a Technical Advisory on Evaluating Transportation Impacts in CEQA (2018) which is intended to provide advice and recommendations for evaluating VMT, which agencies and other entities may use at their discretion. As discussed further below, the Technical Advisory offers that screening thresholds may be used to identify when land use projects, such as small-scale projects, should be expected to cause a less-than-significant impact without conducting a detailed traffic study.

**Environmental Setting:** The City of Ukiah generally lies west of U.S. 101 between the U.S. 101/North State Street interchange, and the U.S. 101 / South State Street interchange. Three major interchanges along U.S. 101, Talmage Road, Gobbi Street, and Perkins Street (from south to north), provide access to southern and central Ukiah. The City of Ukiah is developed in a typical grid pattern with streets generally oriented north to south and east to west. Bicycle lanes are located throughout the City and public transit is provided by the Mendocino Transit Authority (MTA).

The Project would be located between the intersection of Commerce Drive and Airport Road in the north, and the eastern terminal end of Plant Road to the south. Crossings would occur at Airport Road, Norgard Lane and Plant Road which will require Encroachment Permits from the City of Ukiah Public Works Department, and with the Mendocino County Department of Transportation. The Standard Specifications and the Standard Plans of the California State Department of Transportation 2018 will be applied to the Project.

## **Discussion:**

### **(a) Less than Significant.**

Construction would result in vehicle trips by construction workers and haul-truck trips for material off-haul and deliveries via Highway 101. Construction-related traffic would be temporary, would vary daily, and would be distributed over the course of a workday and work week. The number of construction-related vehicles traveling to and from the Project Area would vary daily. Construction hours would generally be limited to 7:00 a.m. to 7:00 p.m. on weekdays. Nighttime construction is not anticipated, however, the possibility for occasional nighttime work periods cannot be entirely discounted. Due to

the infrequency of truck traffic and the temporary nature of construction, Project construction is not anticipated to conflict with plans, policies or programs related to the effectiveness of the circulation system.

Once complete, the proposed Project is not expected to increase vehicle traffic on local streets, as it would not increase the area's population or redirect on-road traffic patterns. The Project would support increased non-motorized travel to and from the area by trail users. Maintenance of the trail is anticipated to be performed by City staff. It is anticipated that Project operation and maintenance would generate minimal traffic trips, as motorized access would be limited to light maintenance, police, and emergency service vehicles.

**(b) No Impact.**

Transportation Impacts in CEQA (OPR 2018) which contains guidance on methodology and recommendations for establishing screening criteria and thresholds for VMT evaluation, which is used to evaluate impacts in this Initial Study. OPR's Technical Advisory specifies that transportation impact analysis be based on either a project's VMT per capita (or other efficiency metric like VMT per household, per employee) or total VMT change (before and after project). As noted in OPR's Technical Advisory, projects that would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis, include additions of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel (OPR 2018). The Project would construct a Class I Trail (pedestrian and bicycle trail). The Project does not include new or expanded parking facilities. The Project would not add additional motor vehicle capacity to the roadway network and would not lead to additional vehicle travel.

The proposed Project does not include any component that could be characterized as resulting in a potential increase to VMT. To the contrary, the Project would promote multi-modal transportation. By its nature, the Project is VMT-reducing. By promoting multi-modal transportation, the Project will reduce VMT throughout the Project Area and would thus not result in an environmental impact under CEQA. Instead, the Project would result in an environmental benefit by reducing the existing VMT in the City.

PRC 21099 (b) (1), upon which the CEQA VMT guidance is based, specifically states the purpose of the VMT criteria is to promote, "the development of multimodal transportation networks," consistent with the fundamental goals and objectives of the Project. Similarly, the OPR Technical Advisory notes the overall purpose of updating CEQA to include VMT analysis is to help achieve California's long-term criteria pollution and greenhouse gas emission goals, based on four strategies that include, "plan and build communities to reduce vehicular greenhouse gas emissions and provide more transportation options (OPR 2018)," which is also directly supported by the Project's goals and objectives related to multi-modal transportation.

Thus, the Project is consistent with the expectations of the OPR guidance for evaluating transportation impacts in CEQA. Lastly, the OPR guidance clarifies that when evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new transit users as an adverse impact. Therefore, any success the Project ultimately achieves to increasing multi-modal transit (e.g., additional pedestrians and bicyclists using the trail) would not be considered an environmental impact under CEQA. No impact would result.

**(c) Less than Significant.**

Crossing upgrades would require an encroachment permit from the City of Ukiah Public Works Department and with the Mendocino County Department of Transportation. The Project's Technical Specifications (Specification No. 21-02, Appendix D), informed by the California State Department of

Transportation's Standard Specification and Standard Plans (2018), would be implemented during construction in accordance with City requirements, which would include the use of traffic controls, signs, and flaggers, message boards, pedestrian and bicycle control measures, and other measures. Through required compliance with City of Ukiah traffic control requirements and implementation of Specification No. 21-02, construction activities would not result in substantial adverse effects or conflicts with the local roadway system. The impact would be less than significant.

Railroad crossings within city street crossings would remain unaltered, except when providing connections to existing pedestrian facilities (including curb, gutter and sidewalk) located adjacent to the trail. Consistent with applicable design standards, crossings would include detectable warning surfaces. The proposed trail may have potential conflicts between users who are stationary (such as birdwatchers) and bicyclists due to the difference in these activities. However, since the proposed trail would have striping, signage, and unpaved shoulders on both sides which could be used by birdwatchers and other uses who want to get out of the main travel lanes, substantial safety related conflicts between trail users and stationary individuals would be avoided. Based on the information above, the proposed Project would not substantially increase hazards due to a design feature; therefore, the impact is less than significant.

**(d) Less than Significant.**

The proposed Project trail alignment would be adjacent to existing streets. Emergency access to the Project Area already exists from these streets and would continue to exist under the proposed Project during both construction and operation.

Since the trail alignment corridor is already served by emergency and law enforcement personnel, the proposed trail would not slow or hinder emergency response, would not require additional emergency services, and would maintain emergency access to all trail segments. Some alignment scenarios would involve limited work on residential streets to paint markings and install signage, which would generally be brief. Ground disturbance on residential streets would not occur. Painting markings, striping, and installing signage on residential streets would be brief in nature and would not impede emergency access or evacuation routes. The potential impact to emergency access would remain less than significant.

Following construction, all properties along the Project alignment would continue to have emergency access. Operation and maintenance of the Project would not result in substantial additional daily traffic from maintenance activities or truck trips along local roadways, and would, therefore, not affect emergency services or response times in the area. Additionally, no roadway closures are proposed during construction, nor during normal operation of the Project. No operational impact on emergency access would result.

**Mitigation Measures:** None

## 18. Tribal Cultural Resources

TRIBAL CULTURAL RESOURCES					
Would the project 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:	Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact	
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

**Significance Criteria:** An impact to tribal cultural resources would be significant if the Project were to substantially reduce the significance of a tribal cultural resource, a listed or eligible historic resource, or a resource considered significant by a California Native American tribe. Tribal cultural resources include “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe” that are eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources. Lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the Proposed Project.” The consultation process must be completed before a CEQA document can be certified.

**Environmental Setting:** As discussed in Section 5. *Cultural Resources*, areas that are most typically culturally sensitive include those adjacent to streams, springs, and mid-slope benches above watercourses because Native Americans and settlers favored easy access to potable water.

Tribes known to be present within the Ukiah area include (but are not limited to) the following:

- Coyote Valley Band of Pomo Indians
- Guidiville Indian Rancheria of Pomo Indians
- Hopland Band of Pomo Indians
- Pinoleville Pomo Nation
- Potter Valley Rancheria
- Redwood Valley Little River Band of Pomo Indians
- Sherwood Valley Rancheria of Pomo Indians
- Noyo River Indian Community
- Scotts Valley Band of Pomo Indians
- Yokayo Tribe, not federally recognized

**Discussion:**

**(a-b) Less than Significant.** As discussed under III. Project Background, the City of Ukiah received a report from the Northwest Information Center (NWIC) indicating that unrecorded archaeological sites may be present within the Project area. As part of the draft ISMND circulation, the NWIC results will be forwarded the Great Redwood Trail Agency for assessment of any cumulative impacts regarding archaeological or tribal cultural resources within the Project area. The City also sent an AB 52 notification to the Guidiville Rancheria including Project information and a location map by email and certified mail on August 13, 2024. Commentary or potential mitigation that results from the above communications will be published under the project's Final Initial Study.

If any previously unrecorded archaeological resources or human remains are identified during ground-disturbing construction activities and are found to qualify as a tribal cultural resource pursuant to PRC Section 21074(a)(1) (determined to be eligible for listing in the California Register or in a local register of historical resources), any impacts to the resource resulting from the Project could be potentially significant.

As discussed under 2. Cultural Resources, as part of the project design (See Appendix D), the following mitigation has been incorporated to address these potentials and reduce impacts to less than significant, including the following:

1. If archaeological resources are discovered at the job site, including chipped or ground stone, historic debris, building foundations, and human bone, do not disturb the resources. Immediately stop all work within 100 feet of the discovery, protect the discovery area, and notify the Engineer.
2. If human remains of Native American origin are discovered during project construction, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) (Public Resources Code 5097). If any human remains are discovered or recognized in any location other than a dedicated cemetery, there will be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
  - The County Coroner has been informed and has determined that no investigation of the cause of death is required; and
  - If the remains are of Native American origin, the descendants of the deceased Native Americans have made a recommendation to the landowner of the person responsible for the excavation work for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code 5097.98

If human remains are discovered during any demolition/construction activities, all ground-disturbing activities within a 330 foot radius of the remains shall be halted immediately, and the Mendocino County coroner shall be notified immediately, according to Section 5097.98 of the state Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the County coroner to be Native American, the NAHC shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The City shall consult with the Most Likely Descendant, if any, identified by the NAHC regarding the treatment and disposition of the remains.

**Mitigation Measures:** None

## 19. Utilities and Service Systems

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

**Significance Criteria:** Impacts to utility and service systems would be significant if the Project resulted in the construction or expansion of utilities that could cause significant environmental effects; have insufficient water supplies available to the Project during normal to extremely dry years; resulted in inadequate capacity of the wastewater treatment plant; generated solid waste exceeding the capacity of local infrastructure or impairing the achievement of solid waste reduction goals; or failed to comply with any management and reduction statutes or regulations related to solid waste.

**Environmental Setting:** The majority of City properties are served by City water, sewer, electricity and trash collection as summarized below.

*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 powergenerating capabilities, such as the 3.5 Megawatt Lake Mendocino Hydroelectric Plant, which is one of the City's major sources of electricity (City of Ukiah, 2022).

*Water.* The primary source for water in Ukiah is surface waters of the Russian River, which are diverted from the Eel River and stored in Lake Mendocino. There are five major providers of community water

services in the Ukiah Valley. The City's water service area comprises nearly 100 percent of the population residing within City limits. 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 (City of Ukiah, 2022). All water suppliers are regulated by the California Department of Health Services. The City of Ukiah adopted the 2020 Urban Water Management Plan (UWMP) in 2021. The UWMP considers multiple growth scenarios and determined there is adequate capacity to serve projected hookups through the 2045 planning horizon.

*Sewer and Wastewater.* The City of Ukiah 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. 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 (City of Ukiah, 2022).

*Solid Waste.* The Ukiah landfill, outside City limits on Vichy Springs Road, stopped receiving municipal solid waste in 2001 and the City is working on capping the landfill. 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. Solid waste generated in Ukiah (not capable of recycling or reuse) is exported from the transfer station for disposal to the Potrero Hills Landfill in Solano County. According to California Department of Resources Recycling and Recovery (CalRecycle) the maximum permitted capacity for the Ukiah Transfer Station is 400 tons per day, with no reported estimated capacity closing date (CalRecycle 2024). As of 2020 the facility receives an average of 120 to 130 tons per day (City of Ukiah, 2022).

#### **Discussion:**

**(a) No Impact.** The Project would not require or result in the relocation or construction of any new wastewater treatment, electric power, natural gas, telecommunication facilities, or other utilities. No change to the City's facilities maintenance is anticipated. Following construction, the park would continue to be maintained by the City, as under existing conditions. There would be no impact.

**(b) Less than Significant.** Construction of the Project would require water for dust control, which would be provided from municipal sources onsite and/or trucked to the site. A slight increase in water use would also be expected in order to successfully establish native riparian plantings and site landscaping, proposed as part of the Project. Other than temporary irrigation, the Project does not include or require the extension of any water infrastructure. Thus, the Project would not induce growth or increase demand during operation and maintenance. Therefore, the Project would not result in water supply impacts. Under this criterion, there would be a less than significant impact primarily associated with construction.

**(c) Less than Significant.** Temporary portable toilets may be utilized during construction. Temporary facilities would be provided by the contractor selected to construct the Project and serviced by an approved sanitation facility. Under this scenario, the Project would not incur the need for increased wastewater treatment capacity. The Project would not result in any service change during construction, nor during operation and maintenance. Restrooms are not included in the Project. Therefore, there would be a less than significant impact.

**(d) Less than Significant.** Solid waste proposed for removal includes concrete sidewalk, curb ramp, meridians, shoulder and curb and gutter, pipe, fences, headers, planters culverts, rubble, walls, walks, steps and similar facilities where necessary for new construction or installation as indicated on the



project plans (See Appendix A). In addition to these items, existing railroad equipment, including foundation and associated electrical cabinetry is proposed for removal and salvaged to NWP Co. Existing conduits would be capped and abandoned. The existing concrete foundation for this equipment will be demolished and brought to local facilities, including the Ukiah Transfer Station & Recycling Center, where metal materials would be recycled and non-recyclable materials would be disposed of in accordance with all applicable local, state and federal regulations. The Project would include waste receptacles, spaces for recycling bins, and pet waste stations. Solid waste collected as a part of the Project would be disposed of by the City of Ukiah during regular maintenance activities. Impacts related to solid waste would be less than significant.

**(e) Less than Significant.** The Project would be required to follow all construction and demolition waste diversion requirements from the 2010 California Green Code. No other federal, state, or local regulations would apply to the Project. As a result, the Project would comply with all federal, state, and local management reduction statutes and regulations related to solid waste

**Mitigation Measures:** None

## 20. Wildfire

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

**Significance Criteria:** Impacts to wildfire would be significant if the Project were located in or near a State Responsibility Area (SRA) or lands classified as very high fire hazard severity zones and substantially impaired an emergency response plan; exposed Project occupants to wildfire pollutants or uncontrolled spread of wildfire due to site conditions such as slope and prevailing winds; require the installation or maintenance of infrastructure that could exacerbate fire risk; or expose people or structures to significant risks as a result of post-fire runoff, slope instability or drainage changes.

**Environmental Setting:** All lands within the City of Ukiah are within the jurisdiction of the Ukiah Valley Fire Authority. None of the lands within the City of Ukiah are located within a California Department of Forestry (CalFire) State Responsibility Area (SRA). However, some parcels within the western boundary of the City limits are designated as “Very High” fire severity within the Local Responsibility Area (LRA). The Project site is not located in an area identified as having a High or Very High fire severity risk.

As discussed in Section V.9, *Hazards and Hazardous Materials*, the County’s EOP plan and MJHMP address emergency operations, natural disasters (including wildfire), as well as mitigation strategies to reduce potential risks. The City of Ukiah adopted its “jurisdictional annex” chapter of the MJHMP on November 18, 2020. Hazards identified for the City of Ukiah include earthquakes, wildfire, dam failure, flood and pandemic. Table 1-13 of the City’s jurisdictional annex lists each hazard and mitigation action for City of Ukiah.

### Discussion:

**(a) Less than Significant.** The Project site is accessed via existing driveways and roads, and there are no components of the Project that would conflict with or impair the adopted MJHMP, EOP, or other

adopted emergency response plan or emergency evaluation plan. As described in Section 9, *Hazards and Hazardous Materials*, the Project site is not located within a High or Very High fire severity zone and is being maintained by the City to reduce fire risk. In addition, although there are no specific evacuation routes discussed in either the Mendocino County Emergency Operations Plan or the Mendocino County Multi-Hazard Mitigation Plan (Mendocino County, 2016; 2020), Highway 101 is described in the Mendocino County Evacuation Plan as a primary evacuation route. The Project site is within 400 feet of a Highway 101 on-ramp from Commerce Drive via Airport Park Boulevard and Talmage Road. The CAL FIRE Mendocino Unit Strategic Fire Plan contains goals and policies that relate to identifying and reducing wildland fire hazards in the region, promoting land use planning processes that reduce wildland fire hazards, and developing the resources necessary to implement fire prevention strategies. The Project would not conflict with the implementation of any of these goals or objectives.

**(b) Less than Significant.** In general, The trail would be located in the railroad corridor within a fairly flat topographical area. During Project construction, heavy equipment such as excavators, dozers, and dump trucks would be used. The presence and use of heavy equipment and vehicles would introduce a slight risk of ignition, as a spark from a piece of equipment or a vehicle could ignite surrounding vegetation and result in a fire. However, due to the existing site conditions, and proximity to water which could be used in an emergency situation, the risk of a construction ignition resulting in a fire would be very low. Considering the limited duration of the construction period and the small size of the construction crew and equipment required, the increase in fire risk introduced by construction of the Project would be minimal and temporary. The Project involves a park and floodplain restoration with no inhabitable structures proposed as part of the Project. With respect to fire risk, operation of the site and surroundings would continue as under existing conditions. Although the Project is located near lands susceptible to the spread of wildland fire, the physical characteristics of the Project site and proximity to water would decrease that risk. Thus, under operations, the Project would have no impact with regard to increased risk for the spread of wildland fire. Most trail users would be within the Project Area for a short period of time given the purpose is for passive recreational and non-motorized transportation use. Due to the expected intermittent use of the site by pedestrians, that the Project does not provide any structures to be used for human occupancy, and the fact that the Project is located within an area of “moderate” fire risk, it is not anticipated to exacerbate wildfire risks and thereby expose users to pollutants. Overall impacts associated with construction would be less than significant.

**(c) Less than Significant.** The Project includes the removal of existing debris, grading and recontouring, berm construction, installation of a concrete path, and wetland and vegetation restoration. These components of the Project would not increase fire risk. The Project would not require additional roads, fuel breaks, emergency water sources, power lines or other utilities. Electrical connections for street lights would occur in select locations but would not increase fire risk. Operation and maintenance activities currently occur under existing conditions and, following construction, the Project would not result in the need for substantial additional operation and maintenance activities. The Project would not require the installation or maintenance of infrastructure which could exacerbate fire risk or result in ongoing impacts to the environment. Impacts, primarily related to construction (as discussed in question b), would be limited in duration and less than significant.

**(d) Less than Significant.** The Project site is relatively level and there are no residences located immediately downslope or downstream of the Project site. The closest residence is located just under 50 feet from of the Project site at Norgard Lane. However, the Project would be designed, constructed, and maintained such that slope instability would not occur. Stormwater from the trail will have a chance to infiltrate into previous material and soil prior to reaching the jurisdiction areas downslope of the proposed trail. However, post-construction hydrology will remain essentially the same, as existing

flows will not be redirected, and volume will not increase. Therefore, there would be a less than significant impact.

**Mitigation Measures:** None.

## 21. Mandatory Findings of Significance

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

### Discussion:

**(a) Less than Significant with Mitigation.** Once constructed, the proposed Project has the potential to improve the quality of the environment as the project would remove potentially hazardous debris and enhance wetlands within Great Redwood Trail. However, the analysis presented in this Initial Study has identified potentially significant impacts to Air Quality, Biological Resources, Hazards and Hazardous Materials, and Hydrology and Water Quality, attributable to the Project's construction. To reduce impacts associated with these resource areas, mitigation measures have been proposed. As required by CEQA, these mitigation measures are required to be implemented as directed herein. With implementation of the prescribed mitigation measures, the Project does not have the potential to degrade the quality of the environment, including fish and wildlife species and their habitat, plant or animal communities, or otherwise eliminate examples of major periods of California history or prehistory. With implementation of mitigation, the impacts identified in this Initial Study would be reduced to less than significant levels.

### **(b) Less than Significant with Mitigation.**

A consideration of past, present, and recently foreseeable future projects in Ukiah indicates that the proposed Project would have a less than significant cumulative impact. Given the type, size, and location of the proposed Project relative to other projects proposed in Ukiah, this analysis of potential

cumulative impacts is focused on the southern portion of the City and adjacent unincorporated communities in Southern Mendocino County.

The City is undertaking municipal development such as current and future housing, municipal infrastructure projects, roadway improvements, and other construction, which has the potential to overlap with construction of the Project.

As described in the various resource sections of this document, the Project would either have no impacts or temporary and less than significant impacts (not requiring mitigation measures) for the following resource categories: Aesthetics, Agriculture, Cultural Resources, Energy, Geology/Soils, Greenhouse Gas Emissions, Land Use/Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Wildfire. The Project would not contribute cumulatively considerable impacts for these resources.

The Project could have potentially significant impacts with respect to Air Quality, Biological Resources, Hazards and Hazardous Materials, and Hydrology and Water Quality. However, such impacts would be generally limited to the immediate vicinity of the site and, where necessary, mitigated such that impacts would not substantially combine with other off-site impacts of other projects. Moreover, other projects would also be required to comply with regulatory requirements to reduce effects from these projects. With implementation of mitigation measures and the associated compliance with applicable regulations, the effects from other projects would be reduced and would not be cumulatively considerable when combined with the effects of the Project (also subject to these regulations). Therefore, the impacts would not be cumulatively significant.

**(c) Less than Significant with Mitigation.** Potentially significant impacts on human beings (that could occur either directly or indirectly) are identified in this IS/MND. These are primarily associated with construction of the proposed Project generating potentially significant impacts to Air Quality, Hazards and Hazardous Materials, and Transportation. In each of these sections of the MND mitigation is provided to reduce impacts to less-than-significant levels. Implementation of the mitigation measures identified in this document, along with the necessary compliance with federal, state, and local agency statutes and regulations, potential impacts to human beings would be reduced to less than significant levels.

## IV. DETERMINATION

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### Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Aesthetics                         | <input type="checkbox"/> Agriculture & Forestry   | <input checked="" type="checkbox"/> Air Quality                   |
| <input checked="" type="checkbox"/> Biological Resources    | <input type="checkbox"/> Cultural Resources       | <input type="checkbox"/> Energy                                   |
| <input type="checkbox"/> Geology / Soils                    | <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use / Planning      | <input type="checkbox"/> Mineral Resources                        |
| <input type="checkbox"/> Noise                              | <input type="checkbox"/> Population / Housing     | <input type="checkbox"/> Public Services                          |
| <input type="checkbox"/> Recreation                         | <input type="checkbox"/> Transportation           | <input type="checkbox"/> Tribal Cultural Resources                |
| <input type="checkbox"/> Utilities/Service Systems          | <input type="checkbox"/> Wildfire                 | <input type="checkbox"/> Mandatory Findings of Significance       |

**Summary of Findings:** The Great Redwood Trail Phase 4 Project proposes to extend a 1.9-mile portion of the trail through the City of Ukiah and to provide a pedestrian area and bike path connection while simultaneously restoring wetland area and natural vegetation. The trail alignment follows the existing decommissioned Northwestern Pacific Railroad.

The Project comprises preparation of the site, removal of debris, grading/site recontouring, enhancement of wetlands, a new 10-foot-wide asphalt/concrete walkway with 2-foot gravel shoulders, ecologically appropriate landscaping, and signage improvements. Once constructed the proposed Project would improve the quality of the environment as potentially hazardous debris would be removed from the site and wetlands within the rail corridor would be enhanced.

The analysis presented in the Initial Study has identified potentially significant impacts to Air Quality, Biological Resources, Hazards and Hazardous Materials, and Hydrology and Water Quality, attributable to the Project’s construction. However, with implementation of the mitigation measures described throughout the Initial Study, all impacts would be reduced to less than significant levels.

On the basis of the initial evaluation that follows:

- The proposed Project COULD NOT have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- Although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because mitigation measures and project revisions have been identified that would reduce all impacts to a less than significant level. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- The proposed Project MAY have a significant effect on the environment. An **ENVIRONMENTAL IMPACT REPORT** is required.
- The proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- Although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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## **VII. APPENDICES**

### **Appendix A**

Phase 4: GRT - Ukiah Plan Sheets

### **Appendix B**

Aquatic Resource Report

### **Appendix C**

NCRA License Agreement

### **Appendix D**

Special Provisions for Great Redwood Trail Phase 4 Spec. no 21-02

### **Appendix E**

NCRWQCB Water Quality Certification

### **Appendix F**

CDFW Lake and Streambed Alteration Agreement

### **Appendix G**

Avoidance and Minimization Measures