

# **INITIAL STUDY and ENVIRONMENTAL CHECKLIST**

FOR

**YULUPA INVESTMENTS, LLC PROPERTY ENTITLEMENTS FOR A  
PROPOSED COMPOSTING FACILITY**

**January 2020**

**Lead Agency:  
County of Mendocino**



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**LACO Project No. 9016.01**

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## I. PROJECT SUMMARY

**Date:** January 2020

**Project Title:** Yulupa Investments, LLC Property Entitlements for a Proposed Composting Facility

**Lead Agency:** County of Mendocino

**Contact:** Susan Summerford, Planner III  
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**Location:** The project site (Site), approximately 12 acres in size, is located south of the City of Ukiah limits in unincorporated Mendocino County, east of Highway 101 and directly east of Taylor Drive (see Figures 1 and 3).

**Coastal Zone:** No

**Affected Parcel(s):** Assessor's Parcel Number (APN): 184-140-17

**Current Ukiah Valley Area Plan Land Use Designation:** Industrial (I) (see Figure 2)

**Current County of Mendocino Zoning Designation:** Inland General Industrial (I2:FP[AZ]) (see Figure 2)

### Anticipated Permits and Approvals:

- 1) Adoption of Negative Declaration (ND) by the County of Mendocino
- 2) Approval of the Development Review Application by the County of Mendocino

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

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

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

- 1) A description of the project including the project location
- 2) Identification of the environmental setting
- 3) Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to provide evidence to support the entries
- 4) Discussion of means to mitigate significant effects identified, if any

- 5) Examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls
- 6) The name of the person or persons who prepared and/or participated in the Initial Study

**II. PROJECT DESCRIPTION:** Yulupa Investments, LLC (Owner)/Pacific Recycling Solutions dba Pacific Organics Solutions (Applicant) seeks to secure entitlements necessary for permitting a Compostable Materials Handling Facility (herein referred to as “composting facility”) on the approximately 12-acre property identified by Assessor’s Parcel Number (APN) 184-140-17, and located at 3201 Taylor Drive, Ukiah, in unincorporated Mendocino County, California (herein referred to as “project” or “proposed project”) (see Figure 1).

### **Need for Project**

With the passing of Senate Bills (SB) 1826 (2014) and 1383 (2016), new recycling infrastructure is necessary to meet 2020 and 2025 mandates to reduce the amount of organic material being disposed of in landfills. State and local goals will not be accomplished without new or expanded diversion facilities. Currently, there is only one high-volume facility in Mendocino County that processes organic waste through composting, which receives material from multiple jurisdictions in the region. Without redundancy in local facilities being able to accept and divert this waste stream, inclement weather, natural disasters, and equipment malfunctions can prevent access to this resource, threatening the likelihood of diversion from landfill disposal.

### **Proposed Composting Facility Operations**

The proposed composting operations at its maximum size will process up to 50,000 tons (125,000 cubic yards) of organic waste per year using GORE® Cover technology (see Appendix A) and will primarily occur on an area comprising approximately 4 acres. GORE® Cover technology is designed to limit potential environmental impacts from the composting process with simple construction and operational demands. Build-out of the project will occur in two (2) phases: Phase I will include six (6) windrows (long rows of mixed material placed in heaps or mounds) and up to a total annual throughput of 25,000 tons per year, while Phase II will include an additional six (6) windrows to process a total of up to 50,000 tons per year.

Compost Feedstock will include Agricultural Material, Agricultural By-Product Material, Biosolids, Digestate, Food Material, and Green Material, in accordance with and as defined in Section 17852 of Title 14 of the California Code of Regulations (CCR). The majority of the feedstock will be collected and delivered to the Site as part of the Applicant’s existing waste collection routes from the City of Clearlake, City of Lakeport, County of Lake, self-haul (customers directly bringing waste to the Site), and other commercial accounts as they become available, with the facility accepting an average of 137 tons of material per day (TPD), with a peak of 175 TPD and a maximum annual throughput of 50,000 tons. Incoming tonnage in excess of the facility’s facility peak tonnage will be rejected at the gate. It should be noted that currently, food waste from the Cities of Clearlake and Lakeport and the County of Lake, is disposed of at a landfill.

Composting processes proposed at the Site include load checking, receiving, processing (grinding, blending, etc.) composting, curing, screening, storage, testing, and transport. These activities will occur throughout the Site, as shown on the Conceptual Site Plan included in this submittal (see Figure 3).

Proposed development specific to this application includes:

- Indoor and/or outdoor receiving areas for incoming materials;
- Processing area for chipping, grinding, blending, screening, etc. on designated areas of the Site;
- Approximately 69,000-square-foot concrete composting pad for twelve (12) windrows, with a three (3)-foot concrete push wall on the east side of the pad for mounting equipment for the GORE® cover system, and control boxes for each row located behind the push wall;
- Leachate collection, storage, and reuse system; and
- Finished compost screening and storage areas located on a designated area of the Site.

The concrete composting pad will be designed to accommodate twelve (12) windrows using GORE® cover technology. The GORE® cover system for each of the twelve (12) windrows includes the semi-permeable GORE® cover, in-floor forced aeration and water traps, aeration blowers, oxygen and temperature sensors, controllers, computers, software, and the cover handling system. Two aeration trenches will be located under each windrow to aerate the compost and collect leachate.

An additional structure that may be proposed at the Site in the future would include an operation room for housing composting monitoring equipment to be located adjacent to the concrete composting pad on its own foundation. The Applicant currently is pursuing remote operations of the composting facility that would not require a standalone structure for equipment; however, the potential future structure has been included in the analysis contained in the Initial Study in order to provide a comprehensive review of all proposed development.

It should be noted that the receiving areas for incoming materials and processing area are spaces related to waste processing that were anticipated under the GPA/ZR. However, they have been included in this project proposal in order to provide a comprehensive description of the composting process. Additional Site development, conceptually proposed under the GPA/ZR and further detailed in this application includes:

- 30,000 square foot Receiving Building open on the north and south ends, to be used for receiving/sorting materials delivered to the Site;
- Processing areas for chipping, grinding, blending, screening, etc.;
- Storage areas for concrete, wood chips, finished compost, and bins; and
- Driveways and access roads.

Incoming material into the facility will be load-checked upon arrival and weighed in at the neighboring transfer station. Additionally, random load checks will be performed by facility personnel on incoming material that does not come across the scale and will be documented, with records maintained in the facility's administrative office. Each load will be characterized by material type and directed to the appropriate receiving area. Feedstock will be temporarily stored in receiving areas, designated by type of organic waste (with food material and biosolids to be received only within the Receiving Building); sorted for contaminants; and fed into a grinder located in a designated processing area. To prepare the feedstock for active composting, water (municipal potable water or reclaimed water as available) may be added to the material. The ground material will be placed in windrows (long rows of mixed material placed in heaps or mounds) on the concrete composting pad using a front-end loader or walking floor trailer. Each windrow will be approximately 26 feet wide, 164 feet long, and 10-to-12 feet high, containing approximately 1,000 to 2,000 cubic yards of composting material. Once the windrows are constructed, they will be covered tightly with GORE® covers to compost for a total of six (6) weeks. This includes four (4) weeks of active composting and two (2) weeks of curing. Throughout the six-week composting cycle, the windrows will be diligently monitored using temperature and oxygen probes inserted into the material. The GORE® cover system uses forced aeration, coupled with leachate collection, to ensure the ideal composting conditions are maintained and any potential contaminants are contained within the system. Blowers mounted to the east side of each windrow provide air to the compost via the aeration trenches located beneath each windrow, allowing for an even distribution of air through the entire volume of material and ensuring temperatures needed for sanitizing the material are reached throughout the windrow. Leachate collected in water traps under the windrows will be directed towards a leachate storage tank for holding and then will be pumped to collection tanks for reuse in the composting system. Any excess leachate that exceeds the needs of the operation will be transferred off-site to a facility authorized to receive that material. After the active composting and curing process is complete, the

GORE® cover will be removed and finished compost will then be screened for size separation and contaminants removed as necessary. When contaminants are found, they will be placed in separate containers to be recycled or disposed of depending on the nature of the material. Oversized material will be returned to pretreated feedstock and contaminants will be disposed of off-site within seven (7) days. Finished compost samples will be tested for maximum metal concentration, pathogen reduction, and physical contaminants pursuant to 14 CCR §17868.1, 14 through §17868.3.1. Compost that meets threshold testing will be sold and transported off-site.

Compostable material that has undergone pathogen reduction will not be mixed with feedstock, compost, waste or additives that have not undergone pathogen reduction. These types of material will be kept separate to prevent contamination.

### On-Site Material Storage Times

Table 1, below, details the anticipated maximum and average lengths of time different materials will be stored at the facility.

Table 1. Summary of Average and Maximum Storage Times

Material Type	Storage Location	Average Storage Time	Maximum Storage Time
Green Material, Agricultural Material, Agricultural By-Product Material	Receiving Area	1 week	8 weeks
Food Material, Biosolids, Digestate	Receiving Building	1 week	2 weeks
Prepared Feedstock	Under GORE® Cover Windrows	6 weeks	12 weeks
Overs	Outdoors, Receiving Area, or Receiving Building	1 month	6 months
Finished Compost	Outdoors	1 month	12 months

Source: Pacific Organics Solutions. Report of Composting Site Information. September 2019 (Appendix B).

### Material Handling Equipment

Table 2, below, describes the type of material handling equipment to be utilized on-site under the proposed composting facility operation.

Table 2. Material Handling Equipment

Equipment Type	Number	Use	Capacity
Mobile Grinder	1	Preprocessing prior to composting	95 tons/hour
Mobile Trommel Screen	1	Final processing prior to storage	25 tons/hour
Windrow Auto-Tarper	1	Cover windrows	N/A
Front End Loader	1	Loading material into windrows	15 cubic-yard bucket
Walking Floor Trailer	1	Loading material into windrows	142 cubic yards
Skid Steer	1	Moving feedstock and loading the grinder	1 cubic-yard bucket
Water Truck	1	Feedstock preparation and site maintenance	7,500 gallons

Source: Pacific Organics Solutions. Report of Composting Site Information. September 2019 (Appendix B).

### Required Sampling

Pursuant to required standards, a composite sample will be taken for every 5,000 cubic yards of chipped and ground material produced and analyzed for physical contaminants. The operator will receive and review the sampling results prior to removing material from the facility. Only material at or under the maximum acceptable limits as specified in 14 CCR § 17862.1 (d) will be authorized to leave the facility. If

the facility produces less than 5,000 cubic-yards of chipped and ground material in a 12-month period, one composite sample will be analyzed every 12-months.

In addition, a composite sample will be taken for every 5,000 cubic yards of compost produced and analyzed for maximum metal concentration, pathogen reduction, and physical contaminants. The operator will review the sampling results prior to removing compost from the facility. A laboratory certified by the California Department of Public Health will perform composite sample analysis. Only material at or under the maximum acceptable limits as specified in 14 CCR § 17868.2 and 14 CCR §17868.3 will be authorized to leave the facility or used on-site. If the facility produces less than 5,000 cubic-yards of compost in a 12-month period, one composite sample will be analyzed every 12-months. Compost that contains metals in excess of the maximum metal concentration defined in 14 CCR § 17868.2, Table 3, pathogens in excess of the pathogen reduction requirement defined in 14 CCR § 17868.3(b)(1), or physical contaminants in excess of the limits defined in 14 CCR § 17868.3.1 will be redirected for additional processing, disposal, or other approved use. All testing results will be documented with records maintained at the facility's administrative office, which will be available for inspection during standard operating hours. Furthermore, a minimum of 10 percent of daily incoming green material feedstock or at least one green material feedstock truck per day, whichever is greater, will be inspected to ensure that physical contaminants are no greater than 1 percent of the total weight.

#### **Access and Site Signage**

Only self-haul vehicles, scheduled delivery drivers, and Site personnel have access to the facility during operating hours. Any other guests must check in at the administrative office to receive authorization to be on-site. Perimeter fencing will protect the Site from unauthorized human or animal access. When the facility is closed, all entrances are locked to prevent unauthorized access to the Site.

Traffic flow into, within, and out of the facility will be directed using bilingual Site signage. Entrance and exit signs will be clearly displayed. An engineered circulation design will provide adequate turning radii for vehicles and safe two-way traffic where appropriate. The signs at facility entrances will include the name of the operation, the operator's name, operating hours, materials allowed and prohibited, rates and emergency contact information.

#### **Fire Suppression**

In order to reduce the risk of fire or spontaneous combustion, feedstock will be watered prior to composting. The receiving building will also be equipped with fire sprinklers for fire suppression. If there are any high-risk piles of feedstock, temperatures will be monitored as needed by the site operator. Potential ignition sources will be kept separate from combustible materials. Ample areas adjacent to the feedstock receipt and chipping/grinding areas will be maintained for the spreading and wetting of burning materials. In addition, all Site personnel will be equipped with two-radios or mobile phones. In the event of an emergency, operators are instructed to first dial 911. For an emergency during operating hours, on-site personnel will then contact the facility's main office. For an emergency after working hours, the Operations Manager will be contacted directly via mobile phone.

#### **Litter, Odor, Dust, and Pest Minimization Processes**

Several processes will be implemented to minimize litter, odors, dust, and pests (including rodents and insects) as a result of the operation. Litter will be collected and disposed of daily to prevent safety hazards, nuisances, and off-site migration to the greatest extent possible given weather conditions. A street sweeper will also be used as needed to collect and control litter. To minimize odors, biosolids, digestate, and food material will be stored inside a receiving building and prepared feedstock will be transferred to covered



windrows within two weeks to avoid long-term storage of raw material. In addition, the facility will operate under an Odor Impact Minimization Plan (OIMP), which identifies the prevention methods and protocol to be followed by the operator to limit the impact of odors. Under the project, the operator will review the OIMP annually and after every confirmed odor complaint.

Incoming material will be wetted as necessary prior to chipping to control dust generation. Dry material will be mixed with material with a high moisture content to limit dust generation. Hoses for misting and a street sweeper will also be utilized as necessary to minimize the creation, emission, and accumulation of excessive dust and particulates. Employees working in the facility will be provided dust masks and other Personal Protective Equipment (PPE) as necessary.

Storage of the material inside the receiving building will minimize the attraction of pests (including rodents and insects). Daily cleaning and maintenance of the facility along with a regular pest control program will be implemented to limit the attraction of rodents and insects.

#### **Equipment Breakdown and Power Failure**

In the event of heavy equipment breakdown at the facility, emergency repairs will be made at the C&S Waste Solutions maintenance shop, located approximately 300 yards south of the proposed facility. If and when a power failure occurs, a generator will provide power to the on-site computer equipment, system pumps, windrow auto-tarper, and composting sensors until system power is restored.

#### **Employees and Training**

It is anticipated that during Phase I, the employees needed to operate the composting facility currently work at an existing facility of C&S Waste Solutions and would transfer to the Site upon completion of the proposed development. During Phase II, up to three (3) new employees would be hired to operate the composting facility. All personnel will receive training to successfully perform their specific job duties including proper use and maintenance of equipment. To work at this facility, personnel are trained in contaminant identification and removal, hazardous material recognition, storage and disposal, odor monitoring and management, emergency procedures, fire prevention and suppression, and worker safety. Facility supervisors will evaluate proficiency in these areas annually, and refresher training will be a part of monthly safety meetings. All trainings and instruction will be documented and records maintained at the facility's administrative office.

#### **Restoration Plans (Should Facility Operations Cease)**

The facility is not designed with a termination date. However, should the proposed composting facility cease operations, the operator will clean the facility grounds, drainage areas, equipment, and remaining structures so as to be free of compost materials, construction scraps, and other residues. All residues will be recycled, reused or disposed. Machinery will be cleaned and stored securely or removed from the property.

Additional details regarding the proposed composting facility operations are provided in the facility's Report of Composting Site Information, included in Appendix B.

**III. PROJECT SETTING AND LOCATION:** The Site is currently partially developed with a gravel pad covering the southern portion of the Site and the remaining space with a vegetative cover primarily consisting of grasses from seed spread in late 2018 to stabilize the Site post-grading. In 2018, grading activities at the Site placed 51,818 cubic yards of fill on-site to construct a finished grade pad (approximately 8 acres in size) one foot above flood elevation. The finished pad is relatively flat, sloping gently to the east. In addition, as part of the grading, vegetated swales were constructed along the eastern and southern perimeters of the Site. It should be noted that a row of mature cottonwood trees is located along the western perimeter of the Site, within the county fee-owned right-of-way and therefore not in the purview of this review of the Site.

In 2018, a general plan amendment and zone reclassification (GPA/ZR) were proposed and approved for the Site, changing the land use and zoning designations of the Site from Agricultural Lands (A-G) and Agricultural (A-G) to Industrial (I) and General Industrial (I-2), respectively, as defined in the Mendocino County Code (Code) to make industrial uses principally permitted at the Site. The specific industrial uses proposed under the GPA/ZR, and currently allowed on the Site consist of wood and green waste chipping and grinding (SWIS #23-AA-0052), concrete grinding, and construction demolition and inert debris storage. In order to centralize ongoing operations of C&S Waste Solutions, these activities have relocated to the Site from their previous location at a C&S Waste Solutions facility located north of the City of Ukiah. An Initial Study (IS) was prepared for the GPA/ZR in accordance with the California Environmental Quality Act (CEQA) and on December 18, 2018, the Board of Supervisors adopted a resolution adopting the IS and a Negative Declaration for the GPA/ZR. As such, the analysis contained in this Initial Study will focus on the current land use and zoning designations. Concurrently with the GPA/ZR, a boundary line adjustment was completed to establish the Site as an approximately 12-acre legal parcel. It should be noted that no improvements are proposed to the southwestern-most 2-acre portion of the Site that was previously identified as APN 184-170-06 (see Figure 3 for location of improvements).

The Site is located adjacent to and north of several additional parcels owned and utilized for industrial uses, specifically solid waste services. The Ukiah Transfer Station and Recycling Center is located directly north of the Site, while C&S Waste Solutions is located to the south. Surrounding uses include existing industrial uses to the north and south, existing Northwestern Pacific Railroad (NWPRR) railroad tracks and agricultural land to the east, and Taylor Drive, Highway 101, the Mendocino Solid Waste Management Authority Household Hazardous Waste Facility to the west, and the Highway 101 on- and off-ramps further to the west of the Site. A single-family residential neighborhood is located approximately 900 feet southwest of the Site. The Site is located approximately 480 feet east of Highway 101, approximately 860 feet northeast of State Route 253, and approximately 1,110 feet west of the Russian River. Further north of the Site are a lumber yard, health club, storage yard, Mendocino Transit Authority (MTA) yard, County Animal Control facility, and the City of Ukiah wastewater treatment facility. Existing drainage ditches are located just north and east of the Site, flowing west to east and northwest to southeast, respectively. The Site is not known to contain any wetland or riparian areas (USFWS, 2018).

As discussed above, since the IS prepared and Negative Declaration approved for the GPA/ZR analyzed industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage, the analysis contained in this Initial Study will focus on primarily on the proposed composting facility.

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

**V. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:** As discussed on Page 4, under “CEQA Discussion”, no environmental factors were found to be potentially affected by this project, with all factors being deemed either “**Less Than Significant**” or “**No Impact**”, as indicated by the checklists and associated discussions on the following pages.

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

An explanation for all checklist responses is included, and all answers take into account the whole action involved and the following types of impacts: off-site and on-site; cumulative and project-level; indirect and direct; and construction and operational. The explanation of each issue identifies (a) the threshold of significance, if any, used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance. As all impacts were found to be “Less Than Significant” or “No Impact”, no mitigation measures are required for the project.

In the checklist the following definitions are used:

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

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

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

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

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

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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

I. AESTHETICS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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 checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**DISCUSSION:** The Site is located in an area with other urbanized commercial and industrial uses that are visible from the highway, including, but not limited to, a solid waste transfer station, lumber yard, a health club, and storage yard. A Mendocino Transit Authority (MTA) yard, County Animal Control facility, wastewater treatment facility, a single-family residential neighborhood, and agricultural fields are also located near the Site. The Site is currently partially developed with a gravel pad covering the southern portion of the Site and the remaining space with a vegetative cover primarily consisting of grasses from seed spread in late 2018 to stabilize the Site post-grading. In 2018, grading activities at the Site placed 51,818 cubic yards of fill on-site to construct a finished grade pad (approximately 8 acres in size) one foot above flood elevation. The finished pad is relatively flat, sloping gently to the east. In addition, as part of the grading proposal, vegetated swales were constructed along the eastern and southern perimeters of the Site. The Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. Under the proposed project, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas.

I.a) The proposed project would change the visual character of the Site; however, the County General Plan and Ukiah Valley Area Plan (UVAP) do not designate the Site or surrounding area as scenic vistas. In addition, the proposed project is consistent with the development of the adjacent waste management facilities located to the north and south. As a result, the proposed project, in addition to proposed

processing activities at the Site, would not adversely affect any scenic view. A less than significant impact would occur.

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

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

Under the proposed project, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. The industrial use proposed at the Site would be similar to other uses located on and adjacent to the Site. Since the proposed project proposes development consistent with uses in the area and at the Site, a less than significant impact would occur.

I.d) Composting activities proposed at the Site would occur during the daytime, thereby substantially reducing the need for and use of lighting at the Site. As a result, the proposed project would not create a new source of substantial light or glare. Should any lighting, including nighttime safety or security lighting, be utilized at the Site, it would be required to be downcast and shielded and positioned in a manner as to not shine or allow light glare to extend beyond the boundaries of the Site. Furthermore, any development proposed at the Site would be required to use non-reflective materials. A less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

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

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

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

**DISCUSSION:** The Site is industrial in nature and does not currently contain agricultural or forestry uses. The area comprising the Site has a land use designation of Industrial (I) under the Ukiah Valley Area Plan (UVAP) and is zoned as General Industrial (I-2:FP[AZ]) under the County of Mendocino Zoning Code. The Site is currently partially developed with a gravel pad covering the southern portion of the Site and the remaining space with a vegetative cover primarily consisting of grasses from seed spread in late 2018 to stabilize the Site post-grading. The Applicant is requesting approval of an application for development review to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. The Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas.

As shown on the California Department of Conservation’s California Important Farmland Finder, the Site is primarily designated as Prime Farmland (9.9 acres), with a narrow strip of Unique Farmland along the Site’s northern and western boundaries (California Department of Conservation, 2017a). It should be noted that the most recent map was updated in 2016, prior to the GPA/ZR that amended the land use designation of the Site to Industrial (I) and General Industrial (I-2), respectively.

II.a) As discussed above, the Site is primarily designated as Prime Farmland (9.9 acres), with a narrow strip of Unique Farmland along the Site’s northern and western boundaries (California Department of Conservation, 2017a); however, the most recent California Department of Conservation map was updated in 2016, prior to the GPA/ZR that amended the land use and zoning designations of the Site to Industrial (I)



and General Industrial (I-2), respectively. As of 2016, Mendocino County had 27,044 acres of Important Farmland (Prime Farmland, Unique Farmland, Farmland of Statewide Importance, and Farmland of Local Importance) and the project proposes a composting facility that would impact 4 acres. The use of the Site for an approximately 4-acre composting facility would not cause a significant reduction in the amount of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the County, as the project would cause only a -0.01% change in the County's total amount and a less than significant impact would occur.

II.b) The proposed project would not conflict with existing zoning for, or cause rezoning of agricultural lands, and the Site is not currently under a Williamson Act contract. As the Site is currently designated and zoned as I:FP[AZ] and I-2:FP[AZ], respectively, and will continue to expand on industrial uses. No impact would occur.

II.c-d) The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production, or result in the loss of forest land. The Site is currently designated and zoned as I:FP[AZ] and I-2:FP[AZ], respectively, and will continue to expand on industrial uses. No impact would occur.

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

**MITIGATION MEASURES:** No mitigation required.

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

III. AIR QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>

**Thresholds of Significance:** The project would have a significant effect on air quality if it would conflict with or obstruct implementation of applicable air quality plans; 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; expose sensitive receptors to substantial pollutant concentrations; or result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

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

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

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

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

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

Emissions from the project would be comprised of direct and indirect emissions. On-site emission sources at the Site include stationary, mobile and fugitive sources. Direct emissions from on-site activities, including exhaust and fugitive dust, would result from operation of the composting processing equipment (see Table 2) and moving the compostable material through the various stages of the composting process with a front-end loader. Indirect emissions would be produced by hauling trucks and other vehicles, including

employees and persons bringing compostable material to the Site, traveling to and from the Site. The majority of feedstock for processing would be collected as part of the Applicant’s normal waste collection routes; however, customers would also be able to bring feedstock to the Site for processing. Since vehicles are known to be a major pollution contributor, producing significant amounts of NO<sub>x</sub>, CO, O<sub>3</sub>, and particulate matter, they must be considered when evaluating potential air quality impacts of a proposed project.

The project and its emission sources are subject to the rules and regulations contained in the most recent version of the *Rules and Regulations* of the MCAQMD. The MCAQMD has also identified significance thresholds for use in evaluating project impacts under CEQA, provided in Table 3, below. [Please note: the MCAQMD does not specify thresholds for SO<sub>2</sub>. As a result, the Best Available Control Technology (BACT) emission rates for stationary sources, utilized by the North Coast Unified Air Quality Management District (NCUAQMD) specific to SO<sub>2</sub> are used for this analysis.]

Table 3. MCAQMD Significance Thresholds

Criteria Pollutant and Precursors	Construction Related		Operational Related	
	Average Daily Emissions (lb/day)	Maximum Annual Emissions (tons/year) <sup>1</sup>	Indirect Source Average Daily Emissions (lb/day)	Project/Stationary Source Maximum Annual Emissions (tons/year)
ROG	54	10	180	40
NO <sub>x</sub>	54	10	42	40
PM <sub>10</sub>	82	15	82	15
PM <sub>2.5</sub>	54	10	54	10
Fugitive Dust (PM <sub>10</sub> /PM <sub>2.5</sub> )	Best Management Practices	--	same as above	
Local CO	--	--	125 tons/year	
SO <sub>2</sub> *	--	--	80	40

Notes:  
<sup>1</sup> = Specific maximum allowable annual emissions related to construction was not provided by MCAQMD and was calculated based on the maximum average daily emissions thresholds.  
\* = Since MCAQMD does not specify thresholds for SO<sub>2</sub>, the threshold for SO<sub>2</sub> utilized by NCUAQMD is used for this analysis.

Source: MCAQMD, 2010, and North Coast Unified Air Quality Management District (NCUAQMD) Rules and Regulations. Regulation 1, Rule 110. Best Available Control Technology (BACT). July 9, 2015. Available at: <http://www.ncuaqmd.org/files/rules/reg%201/Rule%20110.pdf>.

Air quality impacts anticipated under development of the proposed project were modeled using the California Emissions Estimator Model (CalEEMod) to quantify potential criteria pollution and greenhouse gas (GHG) emissions associated with Site preparation and operation of the proposed composting facility. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Further, the model identifies mitigation measures to reduce criteria pollutants and GHG emissions along with calculating the benefits achieved from measures chosen by the user (CalEEMOD, 2017). Air quality impacts anticipated under the proposed project would not be expected to significantly differ from the anticipated emissions quantified under the GPA/ZR and relocation of solid waste processing activities, recently approved by the County Board of Supervisors in December 2018. As previously discussed, composting processes proposed at the Project Site include receiving, processing, composting, curing, screening, storage, and transport. Equipment utilized on-site will utilize the same machinery used at the Applicant’s solid waste processing facility relocated to the Site (including

wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage), in addition to equipment associated with the GORE® cover system (which specifically includes equipment to pull the covers on/off the windrows and to run a blower to aerate the piles) (see Table 2).

The CalEEMOD results in their entirety are included in Appendix C and represents the maximum emissions anticipated under construction and operation of the project. The CalEEMod model assumes default assumptions for general heavy industrial use. For the purposes of this IS, analysis assumes site preparation and construction of the approximately 69,000-square foot concrete composting pad for the windrows and potential future operation room (anticipated to be a modular structure less than 120 square feet in size ) would begin in July 2019 and be completed over an approximately two-month period (assuming 5 work days per week). Trenching would also be required to install the leachate collection system. No demolition is proposed to occur under the project. The proposed composting facility is anticipated to require the use of a truck, loader, crusher, and possibly a walking floor trailer. Additionally, the CalEEMod analysis includes basic construction- and operational-level mitigation measures, including watering exposed areas and reducing vehicle speeds on unpaved roads. The results of the CalEEMod analysis are shown in Table 4 below, which represents the total amount of emissions anticipated over the potential two-month construction period (accounting for any possible construction associated with the placement of an on-site building for use as the operation room) and under operation of the project.

Table 4. CalEEMod Results for Construction and Operation of the Proposed C&S Waste Composting Facility

Pollutant	Construction Emissions (tons/year)			Operational Emissions (tons/year)		
	Modeled Unmitigated Construction Emissions	Modeled Mitigated Construction Emissions (including % reduction)	Annual Thresholds	Modeled Unmitigated Operational Emissions	Modeled Mitigated Operational Emissions (including % reduction)	Annual Thresholds
Carbon monoxide (CO)	0.4963	0.4963 (no change)	--	1.3873	1.3873 (no change)	125
Nitrogen oxides (NO <sub>x</sub> )	0.6504	0.6504 (no change)	10	1.7772	1.7772 (no change)	40
Particulate matter (PM <sub>10</sub> ) (fugitive)	0.2958	0.1737 (-41.28%)	--	0	0	15
Particulate matter (PM <sub>10</sub> ) (exhaust)	0.0381	0.0381 (no change)	15	0.0909	0.0909 (no change)	15
Particulate matter (PM <sub>2.5</sub> ) (fugitive)	0.0500	0.0266 (-46.83%)	--	0	0	10
Particulate matter (PM <sub>2.5</sub> ) (exhaust)	0.0356	0.0356 (no change)	10	0.0866	0.0866 (no change)	10
Reactive organic gases (ROG)	0.0706	0.0706 (no change)	10	0.2022	0.2022 (no change)	40
Sulfur dioxide (SO <sub>2</sub> )	0.0008	0.0008 (no change)	--	0.0030	0.0030 (no change)	40

Source: CalEEMod Model Results, May 28, 2019, Appendix C.

As shown in Table 4, above, the anticipated emissions associated with site preparation on-site would be well-below MCAQMD's annual thresholds of significance for the six listed criteria pollutants, including carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>, both fugitive and exhaust), reactive organic gases (ROG), and sulfur dioxide (SO<sub>2</sub>) without any mitigation; however, with

compliance with standard regulations of the MCAQMD during site preparation, PM<sub>10</sub> and PM<sub>2.5</sub> (fugitive) emissions would be further reduced. Additionally, CalEEMod results show that both unmitigated and mitigated operational emissions would also be well-below the MCAQMD's annual thresholds of significance. The proposed project would be required to comply with MCAQMD emissions standards to reduce exhaust emissions and control fugitive dust during construction and operation of the project. Furthermore, pursuant to MCAQMD's *Rules and Regulations*, all construction and processing equipment utilized on-site would be required to be kept in good working condition in order to further minimize potential air quality impacts associated with the project. In addition, the project, by design, would minimize the potential for off-site odor impacts. The Applicant would be required to obtain all necessary permits for equipment through the MCAQMD. In addition, as part of the compost facility's Full Solid Waste Facility Permit (SWFP) through CalRecycle and administered by the Local Enforcement Agency (LEA), the Site would be required to comply with a site-specific Odor Impact Minimization Plan (OIMP).

III.a-b) As noted above, the County is in "non-attainment" for PM<sub>10</sub>. Therefore, any use or activity that generates unnecessary airborne particulate matter may be of concern to the MCAQMD and has the potential to create significant project-specific and cumulative effects to air quality. Under the proposed project, the Applicant is proposing to establish a composting facility at the Site. The project would generate both temporary and operational emissions. As shown in Table 4, above, the anticipated emissions associated with site preparation/construction and operational activities would be well-below MCAQMD's annual thresholds of significance for the six listed criteria pollutants, including carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>, both fugitive and exhaust), reactive organic gases (ROG), and sulfur dioxide (SO<sub>2</sub>) without any mitigation. However, the proposed project would be required to comply with MCAQMD emissions standards to reduce exhaust emissions and control fugitive dust during construction and operation of the project. Additionally, all construction and processing equipment utilized on-site would be required to be kept in good working condition in order to further minimize potential air quality impacts associated with the project.

Based on the aforementioned analysis, the proposed project would not conflict with or obstruct implementation of federal, State, or MCAQMD standards, or MCAQMD's Attainment Plan; violate any air quality standard; or result in a cumulatively considerable net increase in the PM<sub>10</sub> non-attainment levels in Mendocino County. As such, a less than significant impact would occur.

III.c-d) Sensitive receptors are defined as people that have an increased sensitivity to air pollution or environmental contaminants, and include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s). The nearest sensitive receptors to the Site include single-family residences within a neighborhood located approximately 900 feet southwest of the Site, across Highway 101.

The proposed project would be anticipated to create exhaust and fugitive dust. Emissions expected from construction equipment during the project's construction phase would be minimal, but, for short periods of time, may slightly impact residents living near the Site. Operation of the proposed project would also be anticipated to result in exhaust and fugitive dust, due to operation of the processing equipment, use of heavy equipment (loader and truck; see Table 2), and from employees and customers traveling to and from the Site. However, given the distance to the nearest sensitive receptors and with suppression of fugitive dust during construction and operation, pursuant to Rule-1-430 (Fugitive Dust Emissions) of Chapter IV (Prohibitions) of Regulation 1 (Air Pollution Control Rules) of the MCAQMD's *Rules and Regulations*, and maintaining all equipment in good working, fugitive dust and exhaust emissions would be minimized. Incoming material will be wetted as necessary prior to chipping to control dust generation. Dry material will

be mixed with material with a high moisture content to limit dust generation. Hoses for misting and a street sweeper will also be utilized as necessary to minimize the creation, emission, and accumulation of excessive dust and particulates. Employees working in the facility will be provided dust masks and other Personal Protective Equipment (PPE) as necessary.

The project, by design, will minimize the potential for off-site odor impacts. Biosolids, digestate, and food material will be stored inside a receiving building and prepared feedstock will be transferred to covered windrows within two weeks to avoid long-term storage of raw material. The Applicant shall obtain all necessary permits for equipment through and comply with the *Rules and Regulations* of the Mendocino County Air Quality Management District (MCAQMD) and comply with the Odor Impact Minimization Plan (OIMP) required as part of the Notification to the Local Enforcement Agency (LEA), which in Mendocino County is the Division of Environmental Health. The operator will review the OIMP annually and after every confirmed odor complaint. Objectionable odors from composting generally occur when anaerobic conditions arise. The proposed composting process would occur under aerobic conditions strictly monitored and maintained by the GORE® cover system, through the aeration process. The pressurized aeration system provides for proper management of the oxygen supply and temperature needed to optimize the composting process (see Appendix A). A less than significant impact would occur.

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

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

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

**DISCUSSION:** The 12-acre Site is currently partially developed with a gravel pad covering the southern portion of the Site and the remaining space with a vegetative cover primarily consisting of grasses from seed spread in late 2018 to stabilize the Site post-grading. In 2018, grading activities at the Site placed 51,818 cubic yards of fill on-site to construct a finished grade pad (approximately 8 acres in size) one foot above flood elevation. The finished pad is relatively flat, sloping gently to the east. In addition, as part of the grading activities, vegetated swales were constructed along the eastern and southern perimeters of the Site. Additional drainage ditches are located just north and east of the Site, flowing west to east and northwest to southeast, respectively. The Site is located approximately 1,110 feet west of the Russian River.

The Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage, which have relocated to the Site from another property located north of Ukiah. Under the proposed project, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, processing areas for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas.

The Site is not known to contain any wetland or riparian areas (USFWS, 2018). However, as provided by the U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation (IPaC) System, 8 bird, amphibian, and flowering plant species, listed as threatened or endangered under the Endangered Species Act (ESA) have the potential to occur at the Site. Additionally, per the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDDB), there are 16 special status species with the potential to occur within the Elledge Peak Quad, which includes the Site. Furthermore, the California Native Plant Society's (CNPS) *Inventory of Rare and Endangered Plants* lists 6 rare or endangered plants with the potential to occur within the Elledge Peak Quad. The candidate, sensitive, or special status species with the potential to occur at the Site are listed in Table 5, below. Because the Site was recently graded for industrial uses, was previously utilized for agricultural use, and is located adjacent to existing industrial uses there is limited potential for any special status plant or wildlife species to be present at the Site.

*Table 5. Species with the Potential to Occur at the Site*

Common Name	Scientific Name
<b>Birds</b>	
Marbled murrelet	<i>Brachyramphus marmoratus</i>
Northern spotted owl	<i>Strix occidentalis caurina</i>
Western snowy plover	<i>Charadrius alexandrinus nivosus</i>
Yellow-billed cuckoo	<i>Coccyzus americanus</i>
Oak titmouse	<i>Baeolophus inornatus</i>
Lewis' woodpecker	<i>Melanerpes lewis</i>
<b>Mammals</b>	
North American porcupine	<i>Erethizon dorsatum</i>
<b>Amphibians</b>	
California red-legged frog	<i>Rana draytonii</i>
Foothill yellow-legged frog	<i>Rana boylei</i>
Red-bellied newt	<i>Taricha rivularis</i>
<b>Reptiles</b>	
Western pond turtle	<i>Emys marmorata</i>
<b>Fish</b>	
Russian River tule perch	<i>Hysterocarpus traski pomo</i>
Steelhead – central California coast DPS	<i>Oncorhynchus mykiss irideus pop. 8</i>
Chinook salmon – California coastal ESU	<i>Oncorhynchus tshawytscha pop. 17</i>
<b>Plants</b>	
Burke's goldfields	<i>Lasthenia burkei</i>
Contra Costa goldfields	<i>Lasthenia conjugens</i>
Showy Indian clover	<i>Trifolium amoenum</i>
Raiche's manzanita	<i>Arctostaphylos stanfordiana ssp. raichei</i>
California lady's-slipper	<i>Cypripedium californicum</i>
Mountain lady's-slipper	<i>Cypripedium montanum</i>
Toren's grimmia	<i>Grimmia torenii</i>
Mendocino bush-mallow	<i>Malacothamnus mendocinensis</i>
North Coast semaphore grass	<i>Pleuropogon hooverianus</i>
Bristly leptosiphon	<i>Leptosiphon acicularis</i>
Source: USFWS, 2018, CDFW, 2018, and CNPS, 2018.	

IV.a) As described above, the Site is currently partially developed with a gravel pad covering the southern portion of the Site and the remaining space with a vegetative cover primarily consisting of grasses from seed spread in late 2018 to stabilize the Site post-grading. In 2018, grading activities at the Site placed 51,818 cubic yards of fill on-site to construct a finished grade pad (approximately 8 acres in size) one foot above flood elevation.

The Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. Under the proposed project, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. As shown in Table 5 above, there are 24 special status plant and wildlife species with the potential to occur on or within the vicinity of the Site. Based on the recent grading of the Site and surrounding industrial uses, there is limited potential for any special status plant or wildlife species to be present at the Site. A less than significant impact would occur.

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



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

- An approximately 1.61 acre riverine wetland, classified as intermittent and streambed seasonally flooded (R4SBC), located approximately 400 feet (0.08 miles) northeast of the Site;
- An approximately 35.14 acre lake wetland, classified as lacustrine, limnetic, unconsolidated bottom, and artificially flooded (L1UBK), located approximately 430 feet (0.08 miles) northeast of the Site;
- An approximately 5.68 acre freshwater forested/shrub wetland, classified as palustrine, forested, and seasonally flooded (PFOC), located approximately 1,215 feet (0.23 miles) east of the Site;
- An approximately 95.67 riverine wetland, classified as riverine, lower perennial, unconsolidated bottom, and permanently flooded (R2UBH), located approximately 1,230 feet (0.23 miles) east of the Site;
- An approximately 0.39 acre riverine wetland, classified as riverine, lower perennial, unconsolidated shore, and seasonally flooded (R2USC), located approximately 1,315 feet (0.25 miles) east of the Site;
- An approximately 0.61 acre freshwater forested/shrub wetland, classified as palustrine, forested, and seasonally flooded (PFOC), located approximately 1,320 feet (0.25 miles) southeast of the Site;
- An approximately 0.34 acre riverine wetland, classified as riverine, lower perennial, unconsolidated shore, and seasonally flooded (R2USC), located approximately 1,900 feet (0.36 miles) southeast of the Site;
- An approximately 1.57 acre riverine wetland, classified as riverine, intermittent, streambed, and seasonally flooded (R4SBC), located approximately 2,030 feet (0.38 miles) west of the Site;
- An approximately 1.68 acre freshwater emergent wetland, classified as palustrine, emergent, persistent, and seasonally flooded (PEM1C), located approximately 2,170 feet (0.41 miles) east of the Site;
- An approximately 1.02 acre riverine wetland, classified as riverine, lower perennial, unconsolidated shore, and seasonally flooded (R2USC), located approximately 2,175 feet (0.41 miles) southeast of the Site;
- An approximately 0.60 acre freshwater forested/shrub wetland, classified as palustrine, forested, and seasonally flooded (PFOC), located approximately 2,220 feet (0.42 miles) southeast of the Site;
- An approximately 1.96 acre freshwater forested/shrub wetland, classified as palustrine, forested, and temporary flooded (PFOA), located approximately 2,275 feet (0.43 miles) northwest of the Site; and
- An approximately 0.31 acre riverine wetland, classified as riverine, intermittent, streambed, and seasonally flooded (R4SBC), located approximately 2,415 feet (0.46 miles) northeast of the Site.

As previously discussed, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. Under the proposed project, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas.

In order to ensure protection of wetland areas within the vicinity of the Site, any development proposed at the Site would be required to comply with all relevant regulations, including the Mendocino County Stormwater Runoff Pollution Prevention Procedure Ordinance (Chapter 16.30 of the County Code). This would include implementation of standard Best Management Practices (BMPs) such as straw bales, fiber rolls, and/or silt fencing structures to assure the minimization of erosion resulting from construction and to avoid runoff into sensitive habitat areas, limit ground disturbance to the minimum necessary, and stabilize disturbed soil areas as soon as feasible after construction is completed. A less than significant impact would occur.

IV.d) The project would not be anticipated to substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The Site does not contain any streams, creeks, or wetland areas. A less than significant impact would occur.

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

As described above, the Site is currently partially developed, following grading activities that took place at the Site in 2018. All development proposed in this Initial Study will be required to comply with all relevant local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur.

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

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

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

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

**DISCUSSION:** As discussed above, a general plan amendment and zone reclassification (GPA/ZR) were recently approved for the Site, changing the land use and zoning designations of the Site from Agricultural Lands (A-G) and Agricultural (A-G) to Industrial (I) and General Industrial (I-2), respectively, as defined in the Mendocino County Code (Code). An Initial Study (IS) was prepared for the GPA/ZR in accordance with the California Environmental Quality Act (CEQA) and on December 18, 2018, the Board of Supervisors adopted a resolution adopting the IS and a Negative Declaration for the GPA/ZR. An *Archaeological Survey Report* (prepared by Alta Archaeological Consulting on October 31, 2018) and tribal consultation were completed as part of the IS prepared for the GPA/ZR. As the cultural resources research and evaluation included a review of the entire Site, the findings from the GPA/ZR are relevant to the proposed project and included herein.

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

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

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

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

Since there is a moderate potential of identifying Native American archaeological resources in the project area, NWIC recommended that a qualified archaeologist conduct further archival and field study to identify cultural resources and provides specific recommendations in case any archaeological resources are encountered during construction at the Site. Additionally, in the event that future development is proposed on-site in the future, NWIC recommends that a qualified archaeologist conduct further archival and field study to identify cultural resources, and notes in the letter dated July 3, 2018, that field study may include, but is not limited to, hand auger sampling, shovel test units, or geoarchaeological analyses as well as other common methods used to identify the presence of archaeological resources, and if any cultural resources are identified, that they be recorded on DPR 523 historic resource recordation forms. In order to prepare for future development at the Site, the Applicant contracted an additional survey which was completed on October 18, 2018. The field survey document revealed no cultural resources in the project area, and further states that no cultural resources were identified within the project area as a result of a records search, literature review or Native American consultation. The recommendation was that the project could proceed without adversely affecting cultural resources.<sup>1</sup>

**Tribal Consultation:** On August 8, 2018, a formal tribal consultation was initiated by the County of Mendocino, in accordance with Assembly Bill 52, to request consultation and input regarding any specific areas within the Area of Potential Effect (APE) which may be likely to harbor culturally valuable resources and may therefore merit additional protection or require a cultural monitor to be on-site during the project or future Site development. A letter dated September 10, 2018 indicated a previous study (Study #46352)<sup>2</sup> found no cultural resources on the portion of the Site surveyed and recommended no further cultural resources need be sought. However, the Site location indicates a moderate potential for archeological or historical building resources. Therefore, additional surveying of the remaining portions of the Site and the adjacent existing former agricultural buildings were completed at the request of the Applicant. No responses from Tribal consultants were received.

**Archaeological Survey Report:** On October 31, 2018 ALTA Archaeological Consulting, LLC (ALTA) prepared an Archaeological Survey Report (Report) for the Site to satisfy the requirements of the California Environmental Quality Act of 1970, and the responsibility codified in Public Resource Code sections 5097, implementing guidelines 21082 and 21083.2. According to the Report, no cultural resources were identified within the project area as a result of the records search, literature review, Native American consultation or archaeological field survey. ALTA made the following recommendations to ensure that potential cultural resources are not adversely affected by the proposed project:

### Unanticipated Discovery of Cultural Resources

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<sup>1</sup> Archeological Survey Report, Alta Archeological Consulting (ALTA2018-79), Prepared 10/31/18

<sup>2</sup> Green, 2013, Northwest Information Center Letter dated 9/10/18

If previously unidentified cultural resources are encountered during project implementation, avoid altering the materials and their stratigraphic context. A qualified professional archaeologist should be contacted to evaluate the situation. Project personnel should not collect cultural resources. Prehistoric resources include, but are not limited to, chert or obsidian flakes, projectile points, mortars, pestles, and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources include stone or abode foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies.

#### **Encountering Native American Remains**

Although unlikely, if human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and the County Coroner and a qualified archaeologist must be notified immediately so that an evaluation can be performed. If the remains are deemed to be Native American and prehistoric, the Native American Heritage Commission must be contacted by the Coroner so that a "Most Likely Descendant" can be designated and further recommendations regarding treatment of the remains is provided.

The NAHC and NWIC response letters are included in Appendix D of this Initial Study. Due to the confidential nature of the Archaeological Survey Report, a copy of the report is not included.

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

V.b-c) As described above, the Site is currently partially developed with a gravel pad covering the southern portion of the Site and the remaining space with a vegetative cover primarily consisting of grasses from seed spread in late 2018 to stabilize the Site post-grading. In 2018, grading activities at the Site placed 51,818 cubic yards of fill on-site to construct a finished grade pad (approximately 8 acres in size) one foot above flood elevation.

Under the proposed project, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. The following Standard Condition advises the Applicant of the "Discovery Clause" of Mendocino County, which establishes procedures to follow in the event that archaeological or cultural materials are unearthed during future ground disturbing or construction activities.

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

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

**MITIGATION MEASURES:** No mitigation required.

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

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

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

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

Under the proposed project, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. Any development which may occur at the Site in the future would be subject to Part 6 (California Energy Code) of Title 24 of the California Code of Regulations, which contains energy conservation standards applicable to residential and non-residential buildings throughout California.

XIX.a-b) The proposed project would not be anticipated to result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy or wasteful use of energy resources, nor would the proposed project conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As discussed above, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage.

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

**MITIGATION MEASURES:** No mitigation required.

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

VII. GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VII. GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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

Any structure built in Mendocino County would likely be subjected to seismic activity during its expected lifespan. As discussed above, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. All proposed development would be subject to the latest version of the California Building Code (CBC), to reduce any potential geological risks.

Soils underlying the Site are classified as:



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

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

VII.a.i-ii) The Site is located within a seismically active region and, as a result, it is expected that the project area would experience ground shaking of some magnitude during the economic life span of any Site development. However, the Site is not located within an Earthquake Fault Zone and the nearest active fault to the Site is the Maacama Fault Zone, located approximately 2 miles east of the Site (PBS – Earthquake, n.d.). Since all development proposed on-site would be subject to the latest version of the CBC to reduce any potential geological risks, a less than significant impact would occur.

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

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

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

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

VII.d) Expansive soils generally comprise cohesive, fine-grained clay soils and represent a significant structural hazard to buildings founded on them, especially where seasonal fluctuations in soil moisture occur at the foundation-bearing depth and can drastically expand and shrink in volume with moisture changes. The subsurface soils at the Site are loam and clay loam, which may be subject to expansion and

contraction. However, all development proposed at the Site would be designed to ensure foundation(s) would adequately support any proposed structure(s) and, as a result, a less than significant impact would occur.

VII.e) The project would not require installation and use of a septic tank or alternative wastewater disposal system as part of the proposed project. Future development includes the installation of a leachate collection/treatment system for reuse in the composting process. As such, no impact would occur.

VII.f) As described above, the Site is currently partially developed with a gravel pad covering the southern portion of the Site and the remaining space with a vegetative cover primarily consisting of grasses from seed spread in late 2018 to stabilize the Site post-grading. In 2018, grading activities at the Site placed 51,818 cubic yards of fill on-site to construct a finished grade pad (approximately 8 acres in size) one foot above flood elevation.

There is the possibility that unique paleontological resources or sites or unique geologic features could be encountered during future ground disturbing activities or development of the Site. In the event that any paleontological resources or sites or unique geologic features are discovered during site preparation, grading or construction activities, notification would be required, pursuant to County Code Chapter 22.12 – Archeological Resources. As such, a less than significant impact would occur.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Geology and Soils.

VIII. GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions (GHG), either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input 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"/>

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

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

The Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, is a State law that establishes a comprehensive program to reduce greenhouse gas (GHG) emissions from all sources throughout the State. AB 32 requires the State to reduce its total GHG emissions to 1990 levels by 2020, a reduction of approximately 15 percent below emissions expected under a “business as usual” scenario. Pursuant to AB 32, the California Air Resources Board (ARB) must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. The following major GHGs and groups of GHGs being emitted into the atmosphere are included under AB 32: carbon dioxide (CO<sub>2</sub>), methane

(CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>) (ARB, 2014). Assembly Bill (AB) 1803, which became law in 2006, made ARB responsible to prepare, adopt, and update California’s GHG inventory. The 2020 GHG emissions limit statewide, equal to the 1990 level, is 431 million metric tonnes of carbon dioxide equivalent (MMTCO<sub>2</sub>e) (ARB, 2017). Pursuant to Executive Order S-3-05, California has a reduction target to reduce GHG emissions to 80 percent below 1990 levels (ARB, 2014).

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

The California Emissions Estimator Model (CalEEMod) was utilized to quantify potential criteria pollution and GHG emissions associated with both construction and operation of the proposed project. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Further, the model identifies mitigation measures to reduce criteria pollutants and GHG emissions along with calculating the benefits achieved from measures chosen by the user (CalEEMOD). The results of the CalEEMod analysis in their entirety are included in Appendix C.

The addition of the composting facility would be anticipated to increase emissions (specifically, CO<sub>2</sub>) in the vicinity of the Site, due to the equipment operation and vehicles traveling to and from the Site. However, the project would help in According to the CalEEMod results for the proposed project and as shown in Table 6, below, construction activities (both unmitigated and mitigated) would result in approximately 70.10 MTCO<sub>2</sub>e over the potential two-month construction period (assuming 5 work days per week), and the project’s operational emissions (both unmitigated and mitigated) of CO<sub>2</sub> equivalent gasses would be approximately 270.53 MMTCO<sub>2</sub>e per year. It is anticipated that off-road emissions would account for 100 percent of the proposed project’s total anticipated operational emissions. Compared to the emission amounts provided in the California GHG Emission Inventory, construction and operation of the proposed project would account for approximately 0.000002 and 0.00006 percent of the State’s total GHG emissions recorded in 2015, respectively.

*Table 6: Construction, Operational, and Mobile Greenhouse Gas Emissions of the Proposed Project*

<b>Emission Category</b>	<b>CO<sub>2</sub>e Emissions (Metric tons/year)</b>
Construction <sup>1</sup>	<b>70.10<sup>2</sup></b>
Operational	<b>270.53</b>
Excluding Off-Road Sources	0
Off-Road	270.53

Notes:

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

<sup>1</sup>= Analysis assumes a maximum two-month construction period, beginning on July 1<sup>st</sup> and ending on September 20, 2019. Once construction activities are completed, construction emissions would cease at the Site and only operational emissions would

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be anticipated at the Site.

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

Source: CalEEMod Model Results, May 28, 2019, Appendix C.

It is important to note that the anaerobic decomposition of organic materials in landfills has been found to emit greenhouse gases (specifically methane (CH<sub>4</sub>)) that contribute to global climate change. Reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch are part of the Scoping Plan of the California Global Warming Solutions Act of 2006 [Assembly Bill (AB) 32] (CalRecycle, 2018). In addition, Senate Bill (SB) 1383, signed into law by Governor Brown in September 2016, establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. Organic materials--including waste that can be readily prevented, recycled, or composted--account for a significant portion of California's overall waste stream. Food waste alone accounts for approximately 17-18 percent of total landfill disposal (CalRecycle, 2019).

Currently, food waste from Lake County and the Cities of Clearlake and Lakeport goes to landfill. Under the project, the amount of compostable materials being sent to the landfill would be reduced. While the composting process itself could generate small amounts of methane, the forced aeration process proposed to be utilized under the project would significantly reduce and limit potential methane emissions.

VIII.a) A significant amount of GHG emissions is not anticipated under the proposed project. As noted above, construction and operation of the composting equipment at the Site would result in approximately 70.10 and 270.53 MTCO<sub>2</sub>e per year, respectively, which would account for less than one percent of the State's total GHG emissions recorded in 2015. As discussed under Section III, Air Quality, above, the proposed project increase emissions within the vicinity of the Site. However, as previously discussed, compliance with MCAQMD standards and regulations and maintaining all construction equipment in good working condition is required in order to reduce potential air quality impacts associated with the project. In addition, the project, by design, would minimize the potential for off-site odor impacts. The Applicant would be required to obtain all necessary permits for equipment through the MCAQMD. In addition, as part of the compost facility's Full Solid Waste Facility Permit (SWFP) through CalRecycle and administered by the Local Enforcement Agency (LEA), the Site would be required to comply with a site-specific Odor Impact Minimization Plan (OIMP). A less than significant impact would occur.

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

Although the County has not yet prepared and adopted this Plan, a significant amount of GHG emissions is not anticipated under the project, as described above. In addition, the proposed project would not conflict with local, MCAQMD, State, or federal regulations pertaining to GHG emissions, since the proposed project would reduce the amount of organic materials being sent to landfills and would increase the production of compost and mulch, both of which would aid in meeting the goals and policies of the AB 32 Scoping Plan and SB 1383. A less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

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

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

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

**DISCUSSION:** A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or has characteristics defined as hazardous by a federal, state, or local

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

The 12-acre Site is currently partially developed with a gravel pad covering the southern portion of the Site and the remaining space with a vegetative cover primarily consisting of grasses from seed spread in late 2018 to stabilize the Site post-grading. In 2018, grading activities at the Site placed 51,818 cubic yards of fill on-site to construct a finished grade pad (approximately 8 acres in size) one foot above flood elevation. The finished pad is relatively flat, sloping gently to the east. In addition, as part of the grading proposal, vegetated swales were constructed along the eastern and southern perimeters of the Site. Additional drainage ditches are located just north and east of the Site, flowing west to east and northwest to southeast, respectively. The Site is located approximately 1,110 feet west of the Russian River.

The Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. Under the proposed project, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. The proposed industrial use would require the routine transport, use, and disposal of hazardous materials including, but not limited to, fuel, cleaning solvents, and lubricants associated with the use and maintenance of the processing equipment and heavy equipment (trucks, loaders, etc.) associated with loading and moving the material.

The Site does not include any known hazardous waste sites, as mapped by the State Water Resources Quality Control Board (SWRQCB) or the California Department of Toxic Substances Control (DTSC). As provided on the SWRQCB’s GeoTracker and DTSC’s EnviroStor database, 3 listed sites are located within one half mile of the Site, including the following, as provided in Table 7 below.

Table 7: GeoTracker- and EnviroStor-Listed Hazardous Materials Sites within Close Proximity to Site

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

IX.a-b) The proposed project would require the routine transport, use, or disposal of hazardous materials associated with the use and maintenance of heavy equipment associated with the proposed composting activities on-site, such as gasoline, diesel fuel, hydraulic fluids, oils, lubricants, and cleaning solvents. However, the types and quantities of hazardous materials to be used are not expected to pose a significant risk to the public and/or environment and would be managed in accordance with federal, state, and local regulations. Since the transport, use, and storage of any hazardous materials at the Site would be required to be conducted in accordance with all federal, state, and local regulations, a less than significant impact would occur.

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

IX.d) The Site has been checked against the lists of hazardous materials sites maintained by the State of California. Although two known hazardous materials sites are known to be located within the vicinity of the Site, as shown in Table 7, above, approximately 600 feet northwest and 840 feet north, respectively, the Site is not included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5. No impact would occur.

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

As discussed above, proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. The Site is already located within a high noise area along the Highway 101 corridor and is surrounded by existing industrial uses, similar to the use proposed under the project. Since the proposed project would be consistent with the Zone's allowable uses, would comply with the development and density requirements, and no people would reside on-site, a less than significant impact would occur.

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

IX.g) The proposed project would not expose people or structures, either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires. The Site's fire hazard severity is not classified (CalFire, 2012), all proposed development would be subject to the latest version of the California Building Code (CBC) to reduce the flammability of proposed structures, the Site is primarily surrounded by industrial and agricultural uses, and the Site is not forested or located adjacent to forestland. Additionally, as previously discussed, in order to reduce the risk of fire or spontaneous combustion, feedstock will be

watered prior to composting. The receiving building will also be equipped with fire sprinklers for fire suppression. If there are any high-risk piles of feedstock, temperatures will be monitored as needed by the site operator. Potential ignition sources will be kept separate from combustible materials. Ample areas adjacent to the feedstock receipt and chipping/grinding areas will be maintained for the spreading and wetting of burning materials. In addition, all Site personnel will be equipped with two-radios or mobile phones. In the event of an emergency, operators are instructed to first dial 911. For an emergency during operating hours, on-site personnel will then contact the facility's main office. For an emergency after working hours, the Operations Manager will be contacted directly via mobile phone. A less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

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

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

**Thresholds of Significance:** The project would have a significant effect on hydrology and water quality if it would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality; substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin; substantially alter the existing drainage pattern of the site or area, including



through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flows; in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

**DISCUSSION:** The topography of the 12-acre Site is relatively flat, sloping gently to the east. The Site is currently partially developed with a gravel pad covering the southern portion of the Site and the remaining space with a vegetative cover primarily consisting of grasses from seed spread in late 2018 to stabilize the Site post-grading. As shown on Federal Emergency Management Agency's (FEMA) map number 06045C1677F, effective June 2, 2011, the Site is partially located within a 100-year FEMA flood zone. However, as described above, 2018 grading activities placed 51,818 cubic yards of fill on-site to construct a finished grade pad (approximately 8 acres in size) one foot above flood elevation. In addition, as part of the grading proposal, vegetated swales were constructed along the eastern and southern perimeters of the Site. Additional drainage ditches are located just north and east of the Site, flowing west to east and northwest to southeast, respectively.

The Site is located within the boundaries of the Ukiah Stormwater Zone (PBS – MS4, 2014) and, as such, is subject to storm water permitting and conformance with Section E.12 of the Phase II Small Municipal Separate Storm Sewer System (MS4) General Permit issued by the State Water Resources Control Board (SWRCB) (SWRCB Water Quality Order No. 2013-0001-DWQ, General Permit No. CAS000004; amended in 2015 under SWRCB Order WQ 2015-0133-EXEC (SWRCB - Order, 2015)). The Phase II Small MS4 General Permit (Phase II MS4 Permit) requires local governing agencies, such as the County of Mendocino, to regulate storm water runoff from new developments or significant redevelopment projects in urban areas (County - Low, 2018). The Site is under the jurisdiction of the North Coast Regional Water Quality Control Board (NCRWQCB), which exercises rulemaking and regulatory activities in Del Norte, Glenn, Humboldt, Lake, Marin, Mendocino, Modoc, Siskiyou, Sonoma, and Trinity counties. The NCRWQCB is responsible for enforcing the Phase II Small MS4 General Permit in the urban areas of Mendocino County. To comply with the requirements of the MS4 Permit, the County has prepared a *Low Impact Development Standards Manual* (LID Standards Manual), which provides guidance for the implementation of storm water quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from storm water and non-storm water discharges (County - Low, 2018).

Under the proposed project, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. According to the LID Standards Manual, projects other than single-family homes that create or replace 5,000 square feet or more of impervious surface, such as the proposed project, are considered Regulated Projects and must incorporate the standards for Regulated Projects described in the LID Standards Manual.

X.a) As discussed above, as the Site is located within the boundaries of the Ukiah Stormwater Zone (PBS – MS4, 2014) and is subject to storm water permitting and conformance with Section E.12 of the Phase II Small MS4 General Permit, post-construction stormwater flows will be designed and managed in accordance with the standards contained in the LID Standards Manual. Construction activities would be subject to the Mendocino County Stormwater Pollution Prevention Procedure (Chapter 16.30 of the County Code) and the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (CGP) administered through the SWRCB. In accordance with this guidelines, erosion would be minimized, and runoff managed through the implementation of site-specific best management practices (BMPs), including the use of physical barriers such as silt fences, straw matting, and fiber rolls, and preventative actions such as soil compaction, seeding/mulching, as needed, and directing stormwater flows to existing drainage swales located along the perimeters of the Site.

No water quality impacts from the composting process itself are anticipated due to the design of the GORE® cover system and concrete composting pad on which the composting windrows will be placed. The concrete composting pad will be designed to withstand heavy equipment and will be graded towards the east such that leachate from the windrows will be collected in the leachate collection trenches located beneath each windrow and directed to the water trap behind each windrow for transfer to the leachate collection, storage, and reuse system. Separation of stormwater from the composting process is achieved by physically covering material with the GORE® cover which is sealed tightly around each windrow. Stormwater that runs off the top of the windrows will be managed as described above.

The Site is located within the service districts of the Ukiah Valley Sanitation District (UVSD) and the Willow County Water District (WCWD). A connection to the WCWD would be established from the adjacent C&S Waste Solutions facility to adjust moisture when preparing feedstock and reclaimed water may also be used, as available. No development is proposed on-site that would require a connection to the UVSD. Employees would utilize existing facilities at the adjacent C&S Waste Systems facility owned and operated by the Applicant. Future development includes the installation of a leachate collection and treatment system for reuse in the Composting process. The existing WCWD connection and the future leachate collection/treatment system would be required to operate in compliance with all water quality standards and waste discharge requirements.

Through proper implementation of appropriate BMPs and compliance with the Phase II MS4 Permit, the proposed project would not violate any water quality standards or waste discharge requirements, and a less than significant impact would occur.

X.b) The proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, as the proposed composting facility would seek to secure its water supply from the reclaimed water supply in the Ukiah area and although the proposed project would increase the amount of impervious surface at the Site, the Site would be designed in accordance with the guidelines in the LID Manual and would not be anticipated to significantly impact groundwater recharge. While the proposed project does not have an existing water supply connection, due to the area's slow growth and development rate, it is anticipated that adequate capacity remains available in the WCWD to serve development at the Site. A less than significant impact would occur.

X.c.i-ii) The proposed project would not result in substantial erosion or siltation on- or off-site or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, since any potential runoff from the Site would be controlled within the guidance of existing regulations. During construction, erosion would be minimized, and runoff would be managed through the

implementation of site-specific best management practices (BMPs), including the use of physical barriers such as silt fences, straw matting, and fiber rolls, and preventative actions such as soil compaction, seeding/mulching, as needed, and directing stormwater flows to existing drainage swales located along the perimeters of the Site. In addition, the Site would be designed in accordance with the LID Manual so as to control potential runoff post-construction and limit the potential for flooding on- or off-site. A less than significant impact would occur.

X.c.iii) The County has prepared the Low Impact Development Standards Manual (LID Standards Manual), which provides guidance for the implementation of storm water quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from storm water and non-storm water discharges (County - Low, 2018) as regulated by Section E.12 of the Phase II Small MS4 General Permit (SWRCB – Order, 2015). As the Site is located within the boundaries of the Mendocino County Phase II MS4 area and an impervious surface greater than 5,000 square feet is proposed, post-construction stormwater flows will be designed and managed in accordance with the guidelines contained in the LID Manual. Due to the size of the proposed composting pad, it is understood that a Storm Water Control Plan must be prepared and submitted as part of the project approval process (County – Low, 2018).

Compliance with the Site design measures detailed in the LID Manual would ensure polluted runoff is minimized and that the Site would not result in runoff that would exceed the capacity of existing or planned stormwater drainage systems. A less than significant impact would occur.

X.c.iv) Although the Site is currently partially mapped as being within a 100-year FEMA flood zone, grading at the Site that occurred in 2018 resulted in the placement of 51,818 acres of fill on-site to create a finished grade pad one foot above flood elevations. Additionally, the existing drainages along the Site’s northern and eastern boundaries will continue to be utilized for drainage, in addition to the new vegetative V-ditch within the western portion of the Site and vegetated drainage swales within the eastern and southern portions of the Site. As a result, the Site would not impede or redirect flood flows and a less than significant impact would occur.

X.d) Due to the Site’s location, the Site is not located within a tsunami hazard or seiche zone. While the Site is currently partially mapped as being within a 100-year FEMA flood zone, grading completed at the Site in 2018 resulted in the placement of 51,818 acres of fill on-site to create a finished grade pad one foot above flood elevations. As a result, no impact would occur.

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

**MITIGATION MEASURES:** No mitigation required.

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

<b>XI. LAND USE AND PLANNING.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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"/>

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

**DISCUSSION:** Though the Site is located within unincorporated Mendocino County, the Site is under the jurisdiction of the Ukiah Valley Area Plan (UVAP), which focuses on issues and elements of importance to the future growth and development of the Ukiah Valley. If a policy or implementing action is in conflict with the County General Plan, the policy or implementing action from the UVAP shall take precedence over the County General Plan.

The Site has a current land use designation of Industrial (I:FP[AZ]) under the UVAP and is zoned as General Industrial (I-2:FP[AZ]) under the County of Mendocino Zoning Code (see Figure 2). A general plan amendment and zone reclassification (GPA/ZR) were recently approved for the Site, changing the land use and zoning designations of the Site from Agricultural Lands (A-G) and Agricultural (A-G) it's current land use and zoning designations. The specific industrial uses proposed under the GPA/ZR, and currently allowed on the Site, consist of wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. In order to centralize ongoing C&S Waste operations, these activities have been relocated to the Site from their previous location on a property to the north of the City of Ukiah. An Initial Study (IS) was prepared for the GPA/ZR in accordance with the California Environmental Quality Act (CEQA) and on December 18, 2018, the Board of Supervisors adopted a resolution adopting the IS and a Negative Declaration for the GPA/ZR.

XI.a-b) The proposed project would not physically divide an established community or cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The project involves the establishment of a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing, and is consistent with the surrounding uses. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. Since the proposed project would be consistent and compatible with existing uses at the Site and the Site's existing land use and zoning designations, no impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have **No Impact** on Land Use and Planning.

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

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

**DISCUSSION:** As noted in Section 9 (Open Space and Conservation) of the UVAP, natural occurring minerals in the UVAP planning area have or could have economic value to the local economy and the owners of the mineral rights. The most frequently mined products are sand, gravel, and stone, which are used in construction. There are several vesting mining rights to multiple sand bars held in the Ukiah Reach of the Russian River (UVAP, 2011). The Site is located approximately 1,110 feet west of the Russian River and is not known to contain any mineral resources. One existing mining operation is located approximately 1.5 miles northwest of the Site, with an additional mining operation proposed approximately 4.5 miles north of the Site (UVAP, 2011).

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

**MITIGATION MEASURES:** No mitigation required.

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

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

c) For a project located within the vicinity of 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"/>
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**Thresholds of Significance:** The project would have a significant effect on noise if it would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; or generation of excessive groundborne vibration or groundborne noise levels; or expose people residing or working in the project area to excessive noise levels (for a project located within the vicinity of a private airstrip or an airport or an airport land use plan, or where such as plan has not been adopted, within two miles of a public airport or public use airport).

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

As previously discussed, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. The proposed processing activities associated with the Composting facility would result in limited increase in noise at the Site; and, due to exiting industrial uses permitted at the Site and the Site’s location near Highway 101, the Composting facility is proposed to be located within a high-noise area. In addition, the proposed project, would be required to comply with all rules and regulations related to noise.

XIII.a) As described above, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed activities associated with the composting facility that are anticipated to generate noise would include chipping/grinding/blending, screening of raw material, use of equipment to move material throughout the Site (see Table 2), and truck trips hauling material to the facility. These processing activities would result in a limited increase in noise at the Site, as wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage are uses currently approved at the Site, as described above, and noise levels associated with the composting facility itself are anticipated to be much lower. Specific activities associated with the composting facility would be limited in accordance with the following schedule;

- Public hours: 7:00 a.m. to 4:00 p.m. Monday through Saturday and closed on Sundays;
- Commercial hauler hours: 5:00 a.m. to 10:00 p.m. Monday through Saturday and closed on Sundays;

- Facility operation/processing hours: 24 hours per day, 7 days a week.

The Site is located adjacent to and north of several additional parcels owned and utilized by the Applicant for industrial uses, specifically solid waste services. The Ukiah Transfer Station and Recycling Center is located directly north of the Site and C&S Waste Solutions is located directly to the south. Surrounding uses include existing industrial uses to the north and south, existing Northwestern Pacific Railroad (NWPRR) railroad tracks, City of Ukiah wastewater treatment ponds and agricultural land to the east, the Mendocino Solid Waste Management Authority Household Hazardous Waste Facility, Taylor Drive, Highway 101, and the Highway 101 on- and off-ramps to the west of the Site. A single-family residential neighborhood is located approximately 900 feet southwest of the Site. The Site is located approximately 480 feet east of Highway 101, approximately 860 feet northeast of State Route 253, and approximately 1,110 feet west of the Russian River. Further north of the Site are a lumber yard, health club, storage yard, Mendocino Transit Authority (MTA) yard, Mendocino County Animal Control facility, and the City of Ukiah wastewater treatment facility.

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

XIII.b) As previously discussed above, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. Any excavation required for the proposed development would be temporary and would not result in the generation of excessive groundborne vibration or groundborne noise levels. A less than significant impact would occur.

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

As discussed above, proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. The Site is already located within a high noise area along the Highway 101 corridor and is surrounded by existing industrial uses, similar to the use proposed under the project. Since the proposed project would be consistent with

the Zone’s allowable uses, would comply with the development and density requirements, and no people would reside on-site, a less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

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

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

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

**DISCUSSION:** The proposed project involves the establishment of a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. It is anticipated that during Phase I, the employees needed to operate the composting facility currently work at an existing facility of C&S Waste Solutions and would transfer to the Site upon completion of the proposed development. During Phase II, up to three (3) new employees would be hired to operate the composting facility. Furthermore, no residential units are proposed under the project.

XIV.a-b) The proposed project would not induce substantial unplanned population growth nor displace substantial numbers of existing people or housing. As previously discussed, the Site is currently partially developed with a gravel pad covering the southern portion of the Site and the remaining space with a vegetative cover primarily consisting of grasses from seed spread in late 2018 to stabilize the Site post-grading. In 2018, grading activities at the Site placed 51,818 cubic yards of fill on-site to construct a finished grade pad (approximately 8 acres in size) one foot above flood elevation. No existing housing units would be removed, nor is any housing proposed under the project. A composting facility is proposed to be developed at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. It is anticipated that during Phase I, the employees needed to operate the composting facility currently work at an existing facility of C&S Waste Solutions and would transfer to the Site upon completion of the proposed development. During Phase II, up to three (3)



new employees would be hired to operate the composting facility. As such, there would be a minimal increase in employees and population as a result of the project and a less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

**FINDINGS:** The proposed project would have a **Less Than Significant Impact** on Population and Housing.

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

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

**DISCUSSION:** As previously discussed, the proposed project involves the establishment of a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. It is anticipated that during Phase I, the employees needed to operate the composting facility currently work at an existing facility of C&S Waste Solutions and would transfer to the Site upon completion of the proposed development. During Phase II, up to three (3) new employees would be hired to operate the composting facility. There would be a minimal increase in employees and population as a result of the project.

XV.a) The Site is currently and would continue to be served by the City of Ukiah Fire Department and the Ukiah Valley Fire District (UVFD) (PBS – Fire, n.d.). As noted on the City’s website, the City of Ukiah Fire Department is working with the UVFD as the Ukiah Valley Fire Authority (UVFA) in an effort to consolidate overhead for the two organizations while maintaining comprehensive coverage for both the City and

surrounding valley (City, 2012-2018). The nearest fire station to the Site is located approximately 1.3 miles northwest, at 1500 South State Street, which contains UVFD's headquarters and South Station.

As discussed above, a general plan amendment and zone reclassification (GPA/ZR) were recently approved for the Site, changing the land use and zoning designations of the Site from Agricultural Lands (A-G) and Agricultural (A-G) to Industrial (I) and General Industrial (I-2), respectively, as defined in the Mendocino County Zoning Code (Code). An Initial Study (IS) was prepared for the GPA/ZR in accordance with the California Environmental Quality Act (CEQA) and on December 18, 2018, the Board of Supervisors adopted a resolution adopting the IS and a Negative Declaration for the GPA/ZR. Since the composting facility is proposed at the Site where specific industrial uses are allowed, pursuant to the approved GPA/ZR, and it is anticipated that during Phase I, the employees needed to operate the composting facility currently work at an existing facility of C&S Waste Solutions and would transfer to the Site upon completion of the proposed development. During Phase II, up to three (3) new employees would be hired to operate the composting facility. A minimal change in fire protection services is anticipated and a less than significant impact would occur.

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

As discussed above, since the composting facility is proposed at the Site where specific industrial uses are allowed, pursuant to the approved GPA/ZR and it is anticipated that during Phase I, the employees needed to operate the composting facility currently work at an existing facility of C&S Waste Solutions and would transfer to the Site upon completion of the proposed development. During Phase II, up to three (3) new employees would be hired to operate the composting facility. A minimal change in police protection services is anticipated and less than significant impact would occur.

XV.c) The Site is located within the Ukiah Unified School District (UUSD), which comprises six neighborhood elementary schools, two middle schools, a comprehensive high school, in addition to an early education preschool, independent learning opportunities for elementary and high school students, an alternative education high school, and an adult learning center, and serves approximately 6,000 students (UUSD, n.d.). The nearest school to the Site is the Ukiah Junior Academy, located approximately 1,675 feet west of the Site, across Highway 101. No residential units are proposed for construction under the project. Additionally, since it is anticipated that during Phase I, the employees needed to operate the composting facility currently work at an existing facility of C&S Waste Solutions and would transfer to the Site upon completion of the proposed development. During Phase II, up to three (3) new employees would be hired to operate the composting facility. Therefore, the population would not be expected to significantly increase as a result of the project. A less than significant impact would occur.

XV.d) As noted in the County General Plan, the County's park system consists of seven parks and two public access areas managed by the County. Federal lands and state parks and recreational areas are also located throughout the County (General Plan, 2009). The nearest park to the Site is Observatory Park, located approximately 2.2 miles northwest of the Site. No residential units would be constructed under the

proposed project. Additionally, since it is anticipated that during Phase I, the employees needed to operate the composting facility currently work at an existing facility of C&S Waste Solutions and would transfer to the Site upon completion of the proposed development. During Phase II, up to three (3) new employees would be hired to operate the composting facility. Therefore, the population would not be expected to significantly increase as a result of the project. A less than significant impact would occur.

XV.e) There are no elements of the proposed project that would impact public services. Since it is anticipated that during Phase I, the employees needed to operate the composting facility currently work at an existing facility of C&S Waste Solutions and would transfer to the Site upon completion of the proposed development. During Phase II, up to three (3) new employees would be hired to operate the composting facility. Therefore, the population would not be expected to significantly increase as a result of the project. As such, the proposed project would not create a need for other new or physically-altered public facilities (such as a library or hospital). No impact would occur.

**MITIGATION MEASURES:** No mitigation required.

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

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

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

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

- Alex Rorabaugh Center, located approximately 1.1 miles northwest of the Site;
- Observatory Park, located approximately 2.2 miles northwest of the Site;
- Riverside Park, located approximately 2.2 miles northeast of the Site;
- McGarvey Park, located approximately 2.8 miles northwest of the Site;
- Oak Manor Park, located approximately 2.5 miles north of the Site;
- Anton Stadium, located approximately 3.2 miles northwest of the Site;
- Ukiah Municipal Swimming Pool and Todd Grove Park, located approximately 3.2 miles northwest of the Site;
- Ukiah Valley Golf Course, located approximately 3.3 miles northwest of the Site;

- Ukiah Sports Complex, located approximately 3.4 miles north of the Site;
- Pomolita Field, located approximately 3.5 miles northwest of the Site;
- Vinewood Park, located approximately 3.7 miles northwest of the Site; and
- Low Gap Park and Low Gap Dog Park, located approximately 3.9 miles northwest of the Site.

XVI.a-b) No residential units would be constructed, nor is the population expected to increase, as a result of the proposed project. It is anticipated that during Phase I, the employees needed to operate the composting facility currently work at an existing facility of C&S Waste Solutions and would transfer to the Site upon completion of the proposed development. During Phase II, up to three (3) new employees would be hired to operate the composting facility. Therefore, the population would not be expected to significantly increase as a result of the project. A less than significant impact would occur. As such, there would be a minimal increase in employees and population as a result of the project and the proposed project would not increase the usage of or demand for neighborhood and regional parks or other recreational facilities. Therefore, the proposed project would not result in the physical deterioration of parks or facilities, nor would it require the construction of new park or recreational facilities. No impact would occur.

**MITIGATION MEASURES:** No mitigation required.

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

XVII. TRANSPORTATION. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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 section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>

**Thresholds of Significance:** The project would have a significant effect on transportation if it would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b); substantially increase hazards due to a geometric design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or result in inadequate emergency access.

**DISCUSSION:** The Site is located east of Highway 101 and directly east of Taylor Drive (CR #143), a dead-end road that ends at C&S Waste Solutions. Taylor Drive is accessed from South State Street via Plant Road. Currently, the Site is accessed via a gated entrance off of Taylor Drive in the northwestern corner of the Site. The proposed composting facility will be accessed via three (3) Site entrances. Improvements to each of these entrances, as well as paved and rocked access roads to direct the flow of traffic are not included in this proposed project, as they are primarily site features related to the general waste processing activities included in the general plan amendment/zone reclassification (GPA/ZR) approved for the Site in 2018. Members of the public will access the Site from the transfer station to the north, deposit their waste in the area designated for their specific load, and leave the Site via the entrance that connects to Taylor Drive (CR# 143) in the northwestern corner of the property. The existing grading permit approved by the County in 2018 was amended in May 2019 to include proposed improvements to the northern entrance, while it is understood that an encroachment permit from the Mendocino County Department of Transportation (DOT) will be required prior to construction of any improvements to Taylor Drive entrance. The existing rocked driveway from the existing facility to the south will be the primary access road for operators of the C&S Waste Solutions facilities and material collection vehicles.

The proposed project involves the establishment of a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage.

XVII.a) The proposed project would not conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths. As previously discussed, the

proposed project involves the establishment of a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. As a result, it is expected that traffic would slightly increase in the vicinity of the Site, as workers arrive to and leave the Site at the beginning and end of the workday, respectively. However, it is anticipated that during Phase I, the employees needed to operate the composting facility currently work at an existing facility of C&S Waste Solutions and would transfer to the Site upon completion of the proposed development. During Phase II, up to three (3) new employees would be hired to operate the composting facility. Additionally, since the proposed project would no longer require materials to be transferred off-site for processing or diverted to a landfill, this would be anticipated to minimize truck trips transporting materials. A less than significant impact would occur.

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

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

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

Since the proposed project is located approximately 480 feet east of Highway 101 and is not considered a transportation project, a less than significant impact would occur.

XVII.c) As discussed above, the Site is accessed via a gated entrance off Taylor Drive in the northwestern corner of the Site and a rockered entrance from C&S Waste Solutions to the South. In addition, the existing grading permit approved by the County in 2018 was amended in May 2019 to include proposed improvements to the northern entrance. An encroachment permit from the Mendocino County Department of Transportation (DOT) will be required prior to construction of any improvements to Taylor Drive entrance. The existing rockered driveway from C&S Waste Solutions to the south will be the primary access road for operators of the C&S Waste Solutions facilities and material collection vehicles.

The proposed project and the anticipated connections to existing C&S Waste Solutions access roads would not be anticipated to substantially increase hazards due to design features or incompatible uses. As demonstrated by the proposed design improvements shown on the Conceptual Site Plan included with this submittal for development review (see Figure 3), the Site has been designed to provide ample access, roadway width, and turning radii. As such, the project would not create a significant impact and a less than significant impact would occur.

XVII.d) The proposed project would not result in inadequate emergency access on the existing road system. As previously discussed, the Applicant is proposing to establish a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage. The Conceptual Site Plan included with this application for development review (see Figure 3) proposes a general site layout with ample space surrounding all proposed development to provide adequate emergency access. Included in the design is a marking for "NO PARKING FIRE LANE" surrounding the composting pad. A less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

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

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

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

in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1.

**DISCUSSION:** As discussed under Section V, Cultural Resources, above, a general plan amendment and zone reclassification (GPA/ZR) were recently approved for the Site, changing the land use and zoning designations of the Site from Agricultural Lands (A-G) and Agricultural (A-G) to Industrial (I) and General Industrial (I-2), respectively, as defined in the Mendocino County Zoning Code (Code). An Initial Study (IS) was prepared for the GPA/ZR in accordance with the California Environmental Quality Act (CEQA) and on December 18, 2018, the Board of Supervisors adopted a resolution adopting the IS and a Negative Declaration for the GPA/ZR. Cultural resources research was completed as part of the IS prepared for the GPA/ZR. As the cultural resources research included a review of the entire Site, the findings from the GPA/ZR are relevant to the proposed project and included herein. On June 13, 2018, LACO Associates (LACO), on behalf of the Applicant, prepared and delivered a Records Search Summary Request to the Northwest Information Center (NWIC), pursuant to the Memorandum of Understanding (MOU) between the County of Mendocino and the NWIC, to evaluate the potential to encounter archaeological or historic resources at the Site. Additionally, on June 13, 2018, LACO submitted a Native American tribal consultation request list and a Sacred Lands File (SLF) search request to the Native American Heritage Commission (NAHC), in order to confirm the local tribal contacts and whether any known cultural resources are located on-site.

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

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

Based on an evaluation of the environmental setting and features associated within known sites, Native American resources in this part of Mendocino County have been found in areas populated by oak and buckeye, as well as near a variety of plant and animal resources. Sites are also found near watercourses



and bodies of water. The Site is located in flat area approximately ¼-mile from the Russian River. The project area is also in proximity to hilly, wooded area and several other watercourses. Given the similarity of one or more of these environmental factors, there is a moderate potential for unrecorded Native American resources at the Site.

Since there is a moderate potential of identifying Native American archaeological resources in the project area, NWIC recommended that a qualified archaeologist conduct further archival and field study to identify cultural resources and provides specific recommendations in case any archaeological resources are encountered during construction at the Site.

**Tribal Consultation:** On August 8, 2018, formal tribal consultation was initiated by the County of Mendocino, in accordance with Assembly Bill 52, to request consultation and input regarding any specific areas within the Area of Potential Effect (APE) which may be likely to harbor culturally valuable resources and may therefore merit additional protection or require a cultural monitor to be on-site during the project or future Site development. Other than the NWIC letter recommending no further cultural resources need be researched and the declaration of a moderate potential for archeological or historical building resources, no further communication or comments were received from Tribal authorities. The Applicant contracted an additional survey which was completed on October 18, 2018. The field survey document revealed no cultural resources in the project area, and further states that no cultural resources were identified within the project area as a result of a records search, literature review or Native American consultation. The recommendation was that the project could proceed without adversely affecting cultural resources.<sup>3</sup>

**Archaeological Survey Report:** On October 31, 2018 ALTA Archaeological Consulting, LLC (ALTA) prepared an Archaeological Survey Report (Report) for the Site to satisfy the requirements of the California Environmental Quality Act of 1970, and the responsibility codified in Public Resource Code sections 5097, implementing guidelines 21082 and 21083.2. According to the Report, no cultural resources were identified within the project area as a result of the records search, literature review, Native American consultation or archaeological field survey. ALTA made the following recommendations to ensure that potential cultural resources are not adversely affected by the proposed project:

#### **Unanticipated Discovery of Cultural Resources**

If previously unidentified cultural resources are encountered during project implementation, avoid altering the materials and their stratigraphic context. A qualified professional archaeologist should be contacted to evaluate the situation. Project personnel should not collect cultural resources. Prehistoric resources include, but are not limited to, chert or obsidian flakes, projectile points, mortars, pestles, and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources include stone or abode foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies.

#### **Encountering Native American Remains**

Although unlikely, if human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and the County Coroner and a qualified archaeologist must be notified immediately so that an evaluation can be performed. If the remains are deemed to be Native American and prehistoric, the Native American Heritage Commission must be contacted by the Coroner so that a "Most Likely Descendant" can be designated and further recommendations regarding treatment of the remains is provided.

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<sup>3</sup> Archeological Survey Report, Alta Archeological Consulting (ALTA2018-79), Prepared 10/31/18

The NAHC and NWIC response letters are included in Appendix D of this Initial Study. Due to the confidential nature of the Archaeological Survey Report, a copy of the report is not included.

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

XVIII.a.ii) As described above, the Site is currently partially developed with a gravel pad covering the southern portion of the Site and the remaining space with a vegetative cover primarily consisting of grasses from seed spread in late 2018 to stabilize the Site post-grading. In 2018, grading activities at the Site placed 51,818 cubic yards of fill on-site to construct a finished grade pad (approximately 8 acres in size) one foot above flood elevation.

The proposed project involves the establishment of a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending, screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage.

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

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

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

As demonstrated through the completed surveys on the Site, the project is found to be consistent with Mendocino County policies for protection of archaeological, cultural, and tribal cultural resources. A less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

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

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

**Thresholds of Significance:** The project would have a significant effect on utilities and service systems if it would require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years; result in a determination by the wastewater treatment provider, which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or not comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

**DISCUSSION:** The Site is located within the service boundaries of the Ukiah Valley Sanitation District (UVSD) and the Willow County Water District (WCWD); however, the Site has no existing connections to either district. A connection to the WCWD via the adjacent C&S Waste Solutions facility and/or a connection to the reclaimed water "purple pipe" supply as it becomes readily available would be established to adjust moisture when preparing feedstock. No development is proposed on-site at this time that would require a connection to the UVSD. Employees would utilize existing facilities at the adjacent C&S Waste Systems facility owned and operated by the Applicant. Future development includes the installation of a leachate collection and treatment system for reuse in the composting process. The existing WCWD connection and the future leachate collection/treatment system would be required to operate in compliance with all water quality standards and waste discharge requirements.

Electrical service will be needed on-site to provide power to run the aeration blowers, control equipment, computers, software, and the cover handling system. Electricity to the Site will be provided by PG&E, potentially via one (1) of the three (3) existing utility poles located along the southern perimeter of the Site. At this time, natural gas and telecommunications services are not anticipated to be needed at the Site. AT&T, Comcast, or other available provider would provide telephone, cable television, and internet service to the Site, if needed.

XVIX.a) As noted above, the Site is within the service boundaries of UVSD and WCWD. The Applicant anticipates that a connection to the WCWD via the adjacent C&S Waste Solutions facility and/or a connection to the reclaimed water "purple pipe" supply as it becomes readily available would be established to adjust moisture when preparing feedstock. No development is proposed on-site at this time that would require a connection to the UVSD. Electrical service will be needed on-site to provide power to run the aeration blowers, control equipment, computers, software, and the cover handling system. Electricity to the Site will be provided by PG&E, potentially via one (1) of the three (3) existing utility poles located along the southern perimeter of the Site.

In addition, as part of this proposal for development review, the applicable utility agencies would receive project referral(s) from the County, thereby allowing for the proposed project to be reviewed and conditioned to ensure potential impacts are reduced. A less than significant impact would occur.

XVIX.b) As noted in the *Ukiah Valley Special Districts Municipal Service Review (MSR)*, adopted May 6, 2013, by Mendocino County Local Agency Formation Commission (LAFCo), the WCWD provides water service to approximately 990 residential and 60 commercial connections covering approximately 2,760 acres located immediately south of Ukiah, and provides both domestic and irrigation water. WCWD supplies water through a number of sources, including wells, surface water, and Lake Mendocino water. WCWD has surface water rights for 1,440 acre-feet per year (AFY) from November to June and 726 AFY year-round through diversion of underflow of the Russian River. Additionally, WCWD contracts with the Russian River Flood Control and Water Conservation Improvement District (RRFC) for 515 AFY. Although not currently connected, the Applicant anticipates that a connection to the WCWD via the adjacent C&S Waste Solutions facility and/or a connection to the reclaimed water "purple pipe" supply as it becomes readily available would be established to adjust moisture when preparing feedstock. It is noted in the MSR that WCWD has sufficient water rights and purchase agreements to meet future demands (LAFCo, 2013). No impact would occur.

XVIX.c) Per UVSD's website, there are three agencies that provide wastewater treatment services within the Ukiah Valley, including: (1) City of Ukiah (City); (2) UVSD; and (3) Calpella County Water District. The City owns the collection system within a portion of its jurisdictional boundaries and a Waste Water Treatment Plant (WWTP). UVSD owns the collection system within its jurisdictional boundaries, a part of which is within the City's boundaries, (known as the overlap area). UVSD contracts via a Participation Agreement to the City of Ukiah for use of the City-owned WWTP and for maintenance of its collection system. Calpella CWD owns its collection system and WWTP (UVSD, 2018).

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

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

**MITIGATION MEASURES:** No mitigation required.

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

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

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

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

XX.a-d) The Site is not located in or near State responsibility areas or lands classified as very high hazard severity zones (although currently “unzoned”). The Site is located in an area surrounded by existing industrial development (to the north and south of the Site) and agricultural lands to the east and is located within the service boundary of UVFD. As such, there is low threat of wildfire at the Site. The County has not

adopted an emergency response plan or emergency evacuation plan. Furthermore, the project would not require the installation or maintenance of infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, and would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage challenges. No impact would occur.

**MITIGATION MEASURES:** No mitigation required.

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

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

**Thresholds of Significance:** The project would have a significant effect on mandatory findings of significance if it would have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory; have impacts that are individually limited, but cumulatively considerable (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.); or have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

**DISCUSSION:** The project involves development review to determine the compatibility of the establishment of a composting facility at the Site with existing and surrounding uses. As previously discussed, the proposed project involves the establishment of a composting facility at the Site in order to increase the organic waste diversion capacity of the region and eliminate the need to transfer materials off-site for processing. Proposed development plans associated with the composting facility include a concrete composting pad for twelve (12) windrows, a receiving area for materials, a processing area for chipping, grinding, blending,

screening, etc., an operation room for monitoring equipment, a leachate collection, storage, and reuse system, and finished compost screening and storage areas. In addition, the Site has been approved for specific industrial uses, including wood and green waste chipping and grinding, concrete grinding, and construction demolition and inert debris storage.

XXI.a) The Site is not known to contain any wetland or riparian areas (USFWS, 2018). There is the potential for special status plant or wildlife species to occur at the Site (as provided in Table 5). However, because the Site has been previously utilized for agricultural use, is located adjacent to existing industrial uses, was graded in 2018, and is currently utilized for industrial uses, there is limited potential for any special status plant or wildlife species to be present at the Site. Additionally, the Site does not contain any historical structures. A less than significant impact would occur.

XXI.b) The project would not generate any potential direct or indirect environmental effect that would have a substantial adverse impact on human beings including, but not limited to, exposure to geologic hazards, air quality, water quality, traffic hazards, noise, and fire hazards. A less than significant impact would occur.

**MITIGATION MEASURES:** No mitigation required.

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



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## FIGURES:

**Figure 1 Site Vicinity Map**

**Figure 2 Land Use and Zoning Designations**

**Figure 3 Conceptual Site Plan**

## APPENDIX A

### **SG Gore Cover Clean Compost Technology Handout**

## APPENDIX B

### Report of Composting Site Information

## APPENDIX C

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

## APPENDIX D

### **Cultural Resources Correspondence**