

# **DRAFT INITIAL STUDY and ENVIRONMENTAL CHECKLIST**

FOR

## **MENDOCINO-LAKE COMMUNITY COLLEGE SECONDARY ACCESS ROADWAY**

**June 2022**

**Lead Agency:**

Mendocino-Lake Community College District



**Prepared by:**

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**LACO Project No. 6816.28**

**State Clearinghouse Number:**

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## I. PROJECT SUMMARY

**Date:** June 2022

**Project Title:** Mendocino-Lake Community College Secondary Access Roadway

**Lead Agency:** Mendocino-Lake Community College District

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**Location:** The proposed project is to be located south of the Ukiah Mendocino College Campus (College) on the parcels identified by Assessor's Parcel Numbers (APN) 169-020-07, -14, and -15, 156-060-13, and -15, and 156-110-35 (Site). The College is located 4 miles north of Ukiah, west of the intersection of Highway 101 and Hensley Creek Road, at 1000 Hensley Creek Road, Ukiah, California, 95482. The northern end of the Site begins on the north side of the existing track field at the College. The southern end of the Site is located adjacent to the north of Orr Springs Road, west of Highway 101. See Figure 1 for the overview of the project location.

**Coastal Zone:** No

**Affected Parcel(s):** APNs 169-020-07, 169-020-14, 169-020-15, 156-060-13, 156-060-15, and 156-110-35

**Current County of Mendocino Land Use Designations:**

APNs 169-020-07, 169-020-14, & 169-020-15: Public Services (PS)

APNs 156-060-13, 156-060-15, & 156-110-35: Rangelands, 160-acre minimum (RL160)

**Current County of Mendocino Zoning Designation:**

APNs 169-020-07, 169-020-14, & 169-020-15: Public Facilities (PF)

APNs 156-060-13, 156-060-15, & 156-110-35: Rangeland, 160-acre minimum (RL:160)

**Anticipated Permits and Approvals:**

- 1) Approval of Improvement Plans for the project by the Mendocino-Lake Community College District Board of Trustees
- 2) Section 401 Water Quality Certification through the North Coast Regional Water Quality Control Board (NCRWQCB)
- 3) Section 1602 Lake or Streambed Alteration Agreement through the California Department of Fish and Wildlife (CDFW)
- 4) Section 404 Nationwide Permit through the U.S. Army Corps of Engineers (USACE)

**Tribal Cultural Resources:** Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a

plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

The District has no record of receiving requests for notification of proposed projects from California Native American tribes pursuant to Public Resources Code Section 21080.3.1. The District nevertheless sent notification and informal consultation letters on May 12, 2022, to five (5) Native American tribes from a list previously provided by the Native American Heritage Commission (NAHC) for similar projects in the area in order to provide the tribes with an opportunity to advise the District of any comments or concerns regarding the project. A letter dated June 9, 2022, received by the District requested formal consultation from the Pinoleville Pomo Nation. Project-related documents were sent to the Pinoleville Pomo Nation for review on June 21, 2022. The Tribe will have the opportunity to review and comment on the Initial Study during the 30-day public review period, and a link to the Initial Study will be provided to the Tribe once the document is posted online for review. See Section XVIII (Tribal Cultural Resources) for additional detail.

**CEQA Requirement:**

The proposed project is subject to the requirements of the California Environmental Quality Act (CEQA). The Lead Agency is the Mendocino-Lake Community College District. 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; and
- 6) The name of the person or persons who prepared and/or participated in the Initial Study.

## II. PROJECT DESCRIPTION

The Mendocino-Lake Community College District (District) is proposing to construct a secondary access roadway from the Ukiah Mendocino College Campus (College) located at 1000 Hensley Creek Road in Ukiah, California to Orr Springs Road located southwest of the College. The proposed secondary access roadway would be constructed on portions of the parcels identified by Assessor's Parcel Numbers (APNs) 169-020-07, -14, -15, and 156-060-13, -15, and 156-110-35 (Site), which are all owned by the District. The proposed roadway would begin on the north side of the existing track field at the College and extend south through undeveloped grasslands to an existing paved private road at the southern end of the Site, which provides access to Orr Springs Road.

### Purpose and Need

Long identified as a critical need by local, state and federal first responders and emergency planning documents, the purpose of the proposed project is to provide a secondary access roadway from the College to Orr Springs Road. The College is currently solely accessed via the two-lane roadway of Hensley Creek Road, with no alternative route available in the event of the emergency. The proposed project will facilitate construction of a secondary access roadway for emergency use, which will be gated and accessible only to employees of the District, primarily for maintenance purposes, and emergency responders. The proposed secondary access roadway is not intended to be used for regular access by the students or faculty to reach the campus. Existing residential properties in the southern portion of the Site will continue to have easement to the southern portion of the roadway to gain access to Orr Springs Road.

### Proposed Improvements

The proposed roadway will require improvements to the existing driveway approaches at the southwest corner of the College and the southern end of the Site, adjacent to Orr Springs Road, and the construction of a new roadway, with associated cut and fill slopes, cut ditches, rock rip-rap, and drainage crossing improvements. The proposed roadway would be 24 feet wide, with approximately 10 to 15 feet of shoulder gradings to either side and would be approximately 4,030 feet in length. The portion of the proposed roadway within the northern portion of the Site would be designed to follow the existing contours and maintain the existing elevations, to the extent feasible. Constructing the roadway along the existing contours would help to limit the extent of the road prism necessary to achieve the appropriate road design. It is anticipated that 12 oak trees between 6 and 12 inches in diameter at breast height (DBH) and 5 redwood trees between 10 and 30 inches DBH would require removal for expansion of the existing driveway approach near the College. Roadway construction within the southern portion of the Site, near Orr Springs Road would require replacement of an existing paved private road and upgrades to existing drainage infrastructure. Additionally, one 8-inch DBH oak tree and one 6-inch DBH manzanita would require removal for drainage improvements in the southern portion of the Site. Construction equipment for the project would include, but not be limited to, excavators, bulldozers, compactors, slip form pavers, backhoes, and survey equipment.

## III. PROJECT SETTING AND LOCATION

The College is located 4 miles north of Ukiah, west of the intersection of Highway 101 and Hensley Creek Road, at 1000 Hensley Creek Road, Ukiah, California, 95482. The northern end of the Site begins on the north side of the existing track field. The southern end of the Site is located adjacent to the north of Orr Springs Road, west of Highway 101. As noted above, the Site is comprised of APNs 169-020-07, -14, -15, and 156-060-13, -15, and 156-110-35 (Site).

The following environmental setting is generally based on the *Biological Resources Assessment* (BRA) dated October 2021 and prepared by Ms. Lucy Macmillan, M.S. and Ms. Anya Peron-Burdick, M.S. (see Appendix

B), and the site visit conducted by LACO Associates (LACO) and representatives from CDFW and NCRWQCB on April 6, 2022. Refer to the photo log (Appendix A) for photos of the Site.

The following environmental setting is generally based on the *Biological Resources Assessment (BRA)* dated October 2021 and prepared by Ms. Lucy Macmillan, M.S. and Ms. Anya Peron-Burdick, M.S. to analyze potential of sensitive biological resources to occur on the Site, and the site visit conducted by LACO Associates (LACO) and representatives from CDFW and NCRWQCB on April 6, 2022.

Aquatic resources on-site were determined by Lucy Macmillan and Anya Peron-Burdick, as described in the BRA through a combination of review of background materials and a field visit. Wetlands were delineated according to the methods outlined in the *Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West* (Corps, 2008) of the U.S. Army Corps of Engineers (Corps). The Corps identifies wetlands using a "multi-parameter approach" which requires positive wetland indicators in three distinct environmental categories: hydrology, soils, and vegetation. The Site was additionally evaluated for other waters of the United States (WUS), which may include ponds, lakes, river, streams, and all areas below the High Tide Line subject to tidal influence. On June 14, 2021, Lucy Macmillan and Anya Peron-Burdick conducted a wetland assessment along the proposed roadway, with approximately 50 feet on either side of the proposed road alignment. A wetland area was delineated in the northern portion of the Site, southwest of the College. The wetland area is dominated by wetland vegetation including Italian rye grass (*Lolium perenne*), penny royal (*Mentha pulegium*), and dense flower willowherb (*Epilobium densiflorum*). The extent of the wetland area delineated is shown on Plate 1 of the BRA. The wetlands hydrologically connect flows between the streams west of the proposed roadway with the unnamed tributary to Ackerman Creek east of the proposed roadway. The wetland-stream system provides a bed, bank, and channel for intermittent flows from the upper tributaries west of the proposed roadway to the unnamed tributary to Ackerman Creek east of the proposed roadway. Additionally, an ephemeral drainage was identified in the southern portion of the Site, which drains in a southerly direction from an existing stock pond towards Orr Springs Road and Ackerman Creek. The channel of the drainage is incised and measures on average 3 to 4 feet side.

Special-status plants and animals, legally protected under the State and Federal Endangered Species Acts or other regulations, and species that are considered rare by the scientific community, were evaluated for their potential for occurrence at the Site. Special status species include those plants and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the federal Endangered Species Act (ESA) or California Endangered Species Act (CESA); California Department of Fish and Wildlife (CDFW) Species of Special Concern; U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern; CDFW special status invertebrates; and those with California Rare Plant Rank (CRPR) 1A (Plants Presumed Extinct in California), CRPR 1B (Plants Rare, Threatened, or Endangered in California and Elsewhere), or CRPR 2 (Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere), as indicated by the California Native Plant Society (CNPS) Inventory. In addition to regulations for special status species, most birds in the United States, including non-status species, are protected by the Migratory Bird Treaty Act of 1918. Under this legislation, destroying active nests, eggs, and young is illegal.

As detailed in the BRA (2021), special-status wildlife species potentially occurring on or in the vicinity of the project area were determined based on a review of the species recorded in the California Natural Diversity Database (CNDDDB) of CDFW. A list of special-status wildlife species, their status, general habitat requirements, and an assessment of their potential to occur on or in the vicinity of the project area is provided in Table 1 of the BRA (see Appendix B). Five special-status wildlife species, foothill yellow-legged frog (*Rana boylei*), Northern American porcupine (*Erethizon dorsatum*), osprey (*Pandion haliaetus*), red-bellied newt (*Taricha*

*rivularis*), and western pond turtle (*Emys marmorata*) were identified as being documented within five miles of the Site. Based on the biological communities present on the Site and species identified in the search on the CNDDDB, it was determined that the Site provides habitat for nesting birds and raptors, foothill yellow-legged frog and western pond turtle. The remaining species documented in the area (see Table 1 of Appendix B) are not likely to occur due to absence of suitable habitat. Additionally, based on a database query of the CNDDDB and the CNPS Electronic Inventory within a five-mile radius of the project area, five special-status plant species, including Baker's meadowfoam (*Limnanthes bakeri*), Baker's navarretia (*Navarretia leucocephala ssp. bakeri*), Burke's goldfields (*Lasthenia burkei*), North Coast semaphore grass (*Pleuropogon hooverianus*), and Raiche's manzanita (*Arctostaphylos stanfordiana ssp. raichei*) may have the potential to occur in the project area. Rare plant surveys were conducted by Lucy Macmillan and Anya Peron-Burdick in May and June 2021. No rare plants were identified onsite at the time of the surveys. See Table 3 of the BRA (2021) for a list of all plant species identified on-site during the plant surveys.

The College at the northern end of the Site is developed with multiple buildings, parking lots, various sports facilities, greenhouses, and gardens. South of the College, the Site is largely open space comprised of undeveloped grasslands in hilly terrain. An existing unimproved maintenance road parallels an existing fence that generally separates the undeveloped open space lands from an area of open space utilized for a Frisbee golf course and walking trails. The northern portion of the Site contains a wetland-stream system, which provides a bed, bank, and channel for intermittent flows from the upper tributaries west of the proposed roadway to the unnamed tributary to Ackerman Creek east of the proposed roadway, as shown on Plate 1 of the BRA. The tributary appears to drain south to a large stock pond, which drains to Ackerman Creek and, eventually, the Russian River.

The southern portion of the Site contains an existing paved private road that serves approximately four (4) adjacent property owners and connects to Orr Springs Road. The southern portion of the Site contains a large stock pond that outlets to an ephemeral drainage, identified on Plate 2 of the BRA as a southern tributary to Ackerman Creek. The ephemeral drainage generally flows to the southeast to an existing approximately 113-foot long, 24-inch Reinforced Concrete pipe (RCP), which outlets to a north-south oriented roadside ditch located perpendicular to Orr Springs Road on the east side of the paved private road. Surface runoff from the paved private road appears to generally drain to the ephemeral drainage and/or roadside ditch. The roadside ditch outlets in an existing 36-inch Corrugated Metal pipe (CMP) under Orr Springs Road. Drainage from an existing roadside ditch parallel to Orr Springs Road and an unimproved driveway on the west side of the paved private road is conveyed to the west side of the existing driveway apron and under Orr Springs Road via a 12-inch CMP. The existing 36-inch and 12-inch CMPs outfall to Ackerman Creek from a height approximately 25 feet above the creek surface.

#### **IV. ENVIRONMENTAL EFFECTS**

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

## V. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

	Aesthetics		Agriculture and Forestry Resources		Air Quality
X	Biological Resources	X	Cultural Resources		Energy
X	Geology/Soils		Greenhouse Gas Emissions		Hazards & Hazardous Materials
X	Hydrology/Water Quality		Land Use/Planning		Mineral Resources
X	Noise		Population/Housing		Public Services
	Recreation		Transportation	X	Tribal Cultural Resources
	Utilities/Service Systems		Wildfire	X	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. The mitigation measures recommended for the project are included in Appendix C.

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"/>	<p>I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.</p>
<input checked="" type="checkbox"/>	<p>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.</p>
<input type="checkbox"/>	<p>I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.</p>
<input type="checkbox"/>	<p>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.</p>
<input type="checkbox"/>	<p>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.</p>

  
 \_\_\_\_\_  
 Signature

6/30/2022  
 \_\_\_\_\_  
 Date

Eileen Cichocki, VP of Administrative Services  
 \_\_\_\_\_  
 Name and Title

I. <b>AESTHETICS.</b> 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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**

As noted in Chapter 4 (Resource Management Element) of the Mendocino County General Plan (August 2009), the County of Mendocino (County) is a predominately rural county, with most of the land in forest or agricultural production, both of which are considered open spaces that add to the quality of life of the County’s residents and attract tourists. The Site, located generally southwest of the College, is largely open space comprised of undeveloped grasslands in hilly terrain. The College at the northern end of the Site is developed with multiple buildings, parking lots, various sports facilities, greenhouses, and gardens. An existing unimproved maintenance road parallels an existing fence that generally separates open space lands from an area of open space utilized for a Frisbee golf course and walking trails. Currently, the College is accessed via Hensley Creek Road, with no alternative route available in the event of an emergency. This issue has been raised as a significant vulnerability by first responders. The southern portion of the Site contains an existing paved private road that serves approximately four (4) adjacent property owners and connects to Orr Springs Road. Refer to the photo log (Appendix A) for photos of the Site.

Under the proposed project, a secondary access roadway would be constructed, largely through the undeveloped grasslands, to connect the College with Orr Springs Road to the south of the Site. Conceptual plans for the proposed project indicate that the proposed roadway would be 24 feet wide, with approximately 10 to 15 feet of shoulder gradings to either side and would be approximately 4,030 feet in length (see Figure 2 and Appendix E). The proposed roadway would require improvements to the existing driveway approaches at the southwest corner of the College and the southern end of the Site, adjacent to Orr Springs Road, and the construction of a new roadway, with associated cut and fill slopes, cut ditches, and rock rip-rap. The central portion of the proposed roadway would be designed to follow the existing contours and maintain the existing elevations, to the extent feasible. Constructing the roadway along the existing contours would help to limit the extent of the road prism necessary to achieve the appropriate road

design. The proposed roadway construction would additionally impact a roadside ditch and culvert down-gradient of an ephemeral drainage identified in the southern portion of the Site.

It is anticipated that 12 oak trees between 6 and 12 inches DBH and 5 redwood trees between 10 and 30 inches DBH would require removal for expansion of the existing driveway approach near the College. Additionally, one 8-inch DBH oak tree and one 6-inch manzanita would require removal for the above-listed drainage improvements in the southern portion of the Site. No exterior lighting is proposed.

I.a-b) The proposed project is not located within a City- or County-mapped or designated scenic vista; within a scenic resources area, or along a state scenic highway (Caltrans, 2022). The Mendocino County General Plan (2009) does not identify specific scenic vistas in the vicinity of the Site. Furthermore, per Chapter 4 of the 2009 Mendocino County General Plan (pg. 4-31), there are no officially designated State Scenic Highways in Mendocino County, although there are two designated State Scenic Byways through forests, which include the North Central Coast Heritage Corridor on State Route 1 and the Tahoe-Pacific Heritage Corridor encompassing sections of State Route 20 and Highway 101. While not officially designated as State Scenic Highways, Highway 20 through Mendocino County is eligible for designation and Highway 128, which passes through Yolo, Napa, Sonoma, and Mendocino Counties and is 140 miles long, was recently made eligible for designation under Assembly Bill (998) signed by Governor Gavin Newsom in July 2019. However, Highways 20 and 128 are not in the vicinity of the Site. As the Site is currently undeveloped, the Site does not contain any historic buildings. The Site is not a designated scenic vista and is not located in the vicinity of a designated scenic vista or state scenic highway. No impact would occur.

I.c) As noted above, the County is predominately rural, and the Site's location is also considered rural with limited development. Surrounding uses include the College to the north, vineyards to the north, east and south, residences to the south, and undeveloped lands to the west. In addition, the Site is bordered to the south by Orr Springs Road, a two-lane minor collector road managed by the Mendocino County Department of Transportation (MCDOT). Public views of the Site would only be from the College to the north and Orr Springs Road to the south. The northern end of the Site contains an existing driveway at the College that would be slightly modified to accommodate the proposed roadway. No significant change to public views of this portion of the Site would be anticipated. As the central portion of the proposed roadway would be designed to follow the existing contours, to the extent feasible, and the undeveloped grasslands would be largely unaltered, public views of this portion of Site would not be substantially degraded. From Orr Springs Road, other than the proposed improvements to the existing driveway approach, public views of the Site would remain unchanged. The moderately steep (up to 16 percent) slope adjacent to Orr Springs Road and curve of the existing private driveway would prevent public views of the Site. The project would not be anticipated to substantially degrade the existing visual character or quality of public views of the Site and its surroundings. A less than significant impact would occur.

I.d) The proposed development would not create a new source of substantial light or glare at the Site that would adversely affect day or nighttime views in the area. As such, no 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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by 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 has a Mendocino County General Plan land use designation of Public Services (PS) and Rangelands (RL160) and is zoned as Public Facilities (PF) and Rangeland (R-L 160) under the Mendocino County Inland Zoning Code (County Zoning Code), adopted in 1987. South of the College, the Site is largely open space comprised of undeveloped grasslands in hilly terrain. The College at the northern end of the Site is developed with multiple buildings, parking lots, various sports facilities, greenhouses, and gardens. The proposed project consists of construction of a secondary access roadway to connect the College with Orr Springs Road to the south of the Site, through the undeveloped grasslands, paralleling an existing fence and unimproved maintenance road until connecting with an existing paved private road at the southern end of the Site. The existing paved private road provides access from approximately four (4) properties to Orr Springs Road. The proposed project would be permitted as an accessory use to the existing College.

Surrounding uses include the College to the north, vineyards to the north, east and south, residences to the south, and undeveloped lands to the west. The Site is designated as “Urban and Built-up Land” and “Grazing Land” under the Farmland Mapping and Monitoring Program (FMMP) of the California Department of Conservation Division of Land Resource Protection (DOC, 2016), and is not currently under a Williamson Act Agricultural Preserve contract (Mendocino County Maps - Timber Production & Williamson Act Lands, 2014).

II.a-b) The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, conflict with existing zoning for agricultural use, or a Williamson Act contract. As noted above, the Site is designated as "Urban and Built-up Land" and "Grazing Land" under the FMMP of the DOC. No impact would occur.

II.c-d) As discussed above, the Site is currently zoned Public Facilities (PF) and Rangeland (R-L 160) under the County Zoning Code and is therefore neither designated nor zoned as forest land or timberland. Although a limited number of trees may need to be removed as a result of the proposed project, tree removal would be limited to the areas surrounding the existing driveway approach near the College and drainage improvements in the southern portion of the Site. As such, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

II.e) There are no components of the proposed project that would 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. Development of the Site would be limited to the proposed project, a secondary access roadway to be used in the event of an emergency, as described above, and would not support additional development. No impact would occur.

**MITIGATION MEASURES**

No mitigation required.

**FINDINGS**

The proposed project would have **No 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. According to the 2005 Mendocino County Air Quality Management District (MCAQMD) Particulate Matter Attainment Plan (PM Attainment Plan) (pg. 5), the United States Environmental Protection Agency (EPA), California Air Resources Board (CARB), and regional clean air agencies all regulate air quality. Air districts in California are required to monitor air pollutant levels to assure that National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are met and, in the event that they are not, to develop strategies to meet these standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment." Efforts to reduce air emissions are required by the Clean Air Act (CAA) and the California Clean Air Act. The federal government, primarily through the EPA, sets federal health standards for air emissions. The EPA also oversees state and local actions and implements programs for toxic air pollutants, heavy-duty trucks, locomotives, ships, aircraft, off-road diesel equipment, and other types of industrial equipment. In California, the CARB sets state air quality standards and implements programs to improve air quality. The thresholds set by the EPA and CARB of criteria pollutants, which include ozone (O<sub>3</sub>), carbon monoxide (CO), oxides of nitrogen (NO<sub>x</sub>), lead (Lb), sulfur dioxide (SO<sub>2</sub>), particulate matter less than 10 microns in size (PM<sub>10</sub>), and particulate matter less than 2.5 microns in size (PM<sub>2.5</sub>), are shown below in Table 1. The standards set by the CARB are generally more stringent than those set by the EPA and the CARB has set 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).

Table 1 - National and California Ambient Air Quality Standards

Pollutant	Averaging Time	National a,c	State of California b,c
Ozone	1 hour	NA	0.09 ppm (180 µg/m <sup>3</sup> )
	8 hour	0.07 ppm (137 µg/m <sup>3</sup> )	0.07 ppm (137 µg/m <sup>3</sup> )
Carbon Monoxide	1 hour	35 ppm (40,000 µg/m <sup>3</sup> )	20 ppm (23,000 µg/m <sup>3</sup> )
	8 hour	9 ppm (10,000 µg/m <sup>3</sup> )	9.0 ppm (10,000 µg/m <sup>3</sup> )
Nitrogen Dioxide	1 hour	100 ppb (188 µg/m <sup>3</sup> )	0.18 ppm (339 µg/m <sup>3</sup> )
	Annual	0.053 ppm (100 µg/m <sup>3</sup> )	0.03 ppm (57 µg/m <sup>3</sup> )
Sulfur Dioxide	1 hour	75 ppb (196 µg/m <sup>3</sup> )	0.25 ppm (655 µg/m <sup>3</sup> )
	3 hour	NA	NA
	24 hour	0.14 ppm	0.04 ppm (105 µg/m <sup>3</sup> )
	Annual	0.03 ppm	NA
Particulate Matter (PM <sub>10</sub> )	24 hour	150 µg/m <sup>3</sup>	NA
	Annual	12.0 µg/m <sup>3</sup>	12 µg/m <sup>3</sup>
Sulfates	24 hour	NA	25 µg/m <sup>3</sup>
Lead	30 day	NA	1.5 µg/m <sup>3</sup>
	Calendar Quarter	1.5 µg/m <sup>3</sup>	NA
Hydrogen Sulfide	1 hour	NA	0.03 ppm (42 µg/m <sup>3</sup> )
Vinyl Chloride	24 hour	NA	0.010 ppm (26 µg/m <sup>3</sup> )
<p>a National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM<sub>10</sub>, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m<sup>3</sup> is equal to or less than one. For PM<sub>2.5</sub>, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.</p> <p>b California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded.</p> <p>c ppm = parts per million by volume; µg/m<sup>3</sup> = micrograms per cubic meter.</p> <p>NA: Not Applicable.</p>			

The Site is located within the North Coast Air Basin (NCAB) and is subject to the requirements of the MCAQMD. The MCAQMD is responsible for monitoring and enforcing the state and federal Clean Air Acts as well as local air quality protection regulations in Mendocino County. The entire NCAB is currently designated as "non-attainment," or in excess of allowable limits, for the state 24-hour allowable limits for breathable PM<sub>10</sub>, and as "attainment," or within allowable limits, with respect to the balance of the criteria pollutants. The MCAQMD has been determined to be in "attainment", or within allowable limits, for all federal and state ambient air quality standards, except for the state annual average PM<sub>10</sub> standard and the 24-hour PM<sub>10</sub> standard. 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 that the Districts make reasonable efforts toward coming into attainment, defined as a five percent reduction in emissions per year, until the standard is attained. Although not required for coming into attainment for the state standard, the MCAQMD adopted the PM Attainment Plan in 2005. The PM Attainment Plan includes a description of local air quality, the sources of local particulate matter (PM) emissions, and recommended control measures to reduce future PM<sub>10</sub> levels. 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 (MCAQMD, 2005).

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 2, below.

*Table 2. MCAQMD Significance Thresholds*

Criteria Pollutant and Precursors	Average Daily Emissions (lb/day)	Maximum Annual Emissions (tons/year)
ROG	180	40
NO <sub>x</sub>	42	40
PM <sub>10</sub>	82	15
PM <sub>2.5</sub>	54	10
Fugitive Dust (PM <sub>10</sub> /PM <sub>2.5</sub> )	same as above	
Local CO	125 tons/year	

*Source: Mendocino County Air Quality Management District (MCAQMD). Adopted Air Quality CEQA Thresholds of Significance – June 2, 2010. Available at: [http://www.co.mendocino.ca.us/aqmd/pdf\\_files/MCAQMDCEQARecomendations.pdf](http://www.co.mendocino.ca.us/aqmd/pdf_files/MCAQMDCEQARecomendations.pdf).*

As previously discussed, the Site is largely open space comprised of undeveloped grasslands in hilly terrain and is located immediately north of Orr Springs Road and south of the College. The surrounding area contains limited existing development, with existing residences to the south on the parcels identified as APN 169-160-03 and APN 156-110-36, and the College to the north on the parcels identified as APN 169-020-07, -14, and -15. Surrounding uses include the College to the north, vineyards to the north, east and south, residences to the south, and undeveloped lands to the west.

Site improvements proposed under the project involve the construction of an approximately 4,030-foot long, 24-foot-wide roadway with approximately 10 to 15 feet of shoulder gradings to either side. Associated improvements include upgrades to the existing driveway approaches at the southwest corner of the College and the southern end of the Site, adjacent to Orr Springs Road, and drainage crossing improvements, where required.

Emissions from the proposed 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 equipment utilized for Site maintenance. Indirect emissions would be produced by trucks and other vehicles, including workers, traveling to and from the Site. During construction at the Site, the equipment use is expected to include excavators, bulldozers, compactors, slip form pavers, backhoes, and survey equipment. Temporary air pollutant emissions would be associated with the use of construction equipment; however, the project would be required to comply with policies regarding the control of fugitive dust during these activities, which have been established by the MCAQMD. These policies include maintaining all construction equipment in good working condition and limiting truck idling on-site to a maximum of five minutes, pursuant to State law. Once construction is complete, operational emissions at the Site are not expected to increase, as the proposed secondary access roadway is not intended to be used for regular access by the students or faculty to reach the campus, will be gated, and will be accessible only to employees of the Applicant and emergency responders. Residential properties to the south of the roadway will also continue to have access to a portion of the proposed private roadway that provides access to Orr Springs Road.



III.a-b) The project would not conflict with or obstruct implementation of any air quality plan or result in a cumulatively considerable net increase of PM<sub>10</sub>, the only criteria pollutant for which the project region is in non-attainment (MCAQMD, 2005). MCAQMD has advised that generally an activity that individually complies with the state and local standards for air quality emissions would not result in a cumulatively considerable net increase in the countywide PM<sub>10</sub> emissions.

Potential air quality impacts associated with the proposed project were modeled using the California Emissions Estimator Model (CalEEMod) and compared to the significance thresholds shown in Table 2, above. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects. This program is the standard for Air Quality and GHG analysis within the MCAQMD jurisdiction. The model quantifies direct emissions from construction and operations (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. The model is an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California. The model can be used for a variety of situations where an air quality analysis is necessary or desirable such as preparing CEQA or National Environmental Policy Act (NEPA) documents, conducting pre-project planning, and, verifying compliance with local air quality rules and regulations, etc. Under the proposed project, the model was used to estimate emissions and evaluate its impact on air quality.

The CalEEMod results in their entirety are included in Appendix D. The CalEEMod analysis assumes that construction would begin August 2022 (during the dry season) and be constructed over an approximately 2-month period until the entire project is complete in approximately October 2022. It is assumed that the proposed project would implement basic construction- and operational-level mitigation measures, including watering exposed areas and unpaved roads and reducing vehicle speeds on unpaved roads to 10 miles per hour. The results of the CalEEMod analysis are shown in Table 3 below and represent the total amount of emissions anticipated over the construction of the project.

Table 3 – CalEEMod analysis of project construction emissions of criteria air pollutants

Pollutant	Construction Emissions (tons/year)			
	Modeled Unmitigated Construction Emissions	Modeled Mitigated Construction Emissions	Federal Annual Thresholds	MCAQMD Average Daily Significance Threshold
Carbon monoxide (CO)	1.518	1.518	--	125 tons/year
Nitrogen oxides (NOx)	1.287	1.287	10	42
Particulate matter (PM <sub>10</sub> ) (fugitive)	12.939	6.485	20	82
Particulate matter (PM <sub>10</sub> ) (exhaust)	0.055	0.055	20	82
Particulate matter (PM <sub>2.5</sub> ) (fugitive)	1.298	0.652	12	54
Particulate matter (PM <sub>2.5</sub> ) (exhaust)	0.052	0.052	12	54
Reactive organic gases (ROG)	0.205	0.205	--	180
Sulfur dioxide (SO <sub>2</sub> )	2.8500 e-003	2.8500 e-003	--	--

As shown in Table 3 above, emissions from construction would be well-below annual and daily thresholds for the listed pollutants even if the specific mitigation measures provided by the CalEEMod model are not implemented. Compliance with standard regulations of the MCAQMD during project construction would further reduce PM<sub>10</sub> and PM<sub>2.5</sub> emissions. While the anticipated construction at the Site would generate temporary emissions, the proposed project would not include any source of visible emissions, including intentional fire/burning or manufacturing and would control exhaust emissions from construction equipment by minimizing idling. In addition, the contractor would suppress 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 (February 2011) and would maintain all construction equipment in good working order such that exhaust and fugitive dust emissions are minimized. As the proposed project entails the construction of a secondary access roadway not intended to be used for regular access by the students or faculty to reach the campus and that will be gated and accessible only to employees of the District and emergency responders, operational emissions are not anticipated. The proposed project would be subject to current and future regulations adopted by MCAQMD, including the PM Attainment Plan (2005), and compliance with these regulations would ensure the proposed project would not result in a substantial increase of PM<sub>10</sub> within the vicinity of the Site. 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) Sensitive receptors are generally 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). As discussed above, the nearest sensitive receptor to the Site is the College to the north, which includes a day care center, and existing residences to the south.

As provided in Table 2, above, emissions associated with construction and operation of the proposed project would not be anticipated to exceed the annual thresholds of significance of the MCAQMD for the six listed pollutants. Although temporary exhaust from construction equipment may be anticipated over the course of the construction period (August 2022 – October 2022), potential impacts to sensitive receptors near the Site would be minimized due to 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* (February 2011), and the requirement to maintain all equipment in good working condition. A less than significant impact would occur.

III.d) The proposed project would not create substantial emissions (such as odors or dust) adversely affecting a substantial number of people. Temporary odors and dust, typical of construction sites and equipment use, may be generated during the construction phase. However, 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* (February 2011), and maintaining all equipment in good working condition, fugitive dust and exhaust emissions would be minimized. A less than significant impact would occur.

#### **MITIGATION MEASURES**

No mitigation required.

**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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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 following environmental setting is generally based on the BRA dated October 2021 and prepared by Ms. Lucy Macmillan, M.S. and Ms. Anya Peron-Burdick, M.S. to analyze potential of sensitive biological resources to occur on the Site, and the site visit conducted by LACO and representatives from CDFW and NCRWQCB on April 6, 2022.

Aquatic resources on-site were determined by Lucy Macmillan and Anya Peron-Burdick, as described in the BRA through a combination of review of background materials and a field visit. Wetlands were delineated according to the methods outlined in the *Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West* (Corps, 2008). The Corps identifies wetlands using a "multi-parameter approach" which requires positive wetland indicators in three distinct environmental categories: hydrology, soils, and vegetation. The Site was additionally evaluated for other WUS, which may include ponds, lakes, river, streams, and all areas below the High Tide Line subject to tidal influence. On June 14, 2021, Lucy Macmillan and Anya Peron-Burdick conducted a wetland assessment along the proposed roadway, with approximately 50 feet on either side of the proposed road alignment. A wetland area was delineated in the northern portion of the Site, southwest of the College. The wetland area is dominated by wetland vegetation including Italian rye grass (*Lolium perenne*), penny royal (*Mentha pulegium*), and dense flower willowherb (*Epilobium densiflorum*). The extent of the wetland area delineated is shown on Plate 1 of the BRA. The wetlands hydrologically connect flows between the streams west of the proposed roadway with the unnamed tributary to Ackerman Creek east of the proposed roadway. The wetland-stream system provides a bed, bank, and channel for intermittent flows from the upper tributaries west of the proposed roadway to the unnamed tributary to Ackerman Creek east of the proposed roadway. Additionally, an ephemeral drainage was identified in the southern portion of the Site, which drains in a southerly direction from an existing stock pond towards Orr Springs Road and Ackerman Creek. The channel of the drainage is incised and measures on average 3 to 4 feet side.

Special-status plants and animals, legally protected under the State and Federal Endangered Species Acts or other regulations, and species that are considered rare by the scientific community, were evaluated for their potential for occurrence at the Site. Special status species include those plants and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the ESA or CESA; CDFW Species of Special Concern; USFWS Birds of Conservation Concern; CDFW special status invertebrates; and those with CRPR 1A (Plants Presumed Extinct in California), CRPR 1B (Plants Rare, Threatened, or Endangered in California and Elsewhere), or CRPR 2 (Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere), as indicated by the CNPS Inventory. In addition to regulations for special status species, most birds in the United States, including non-status species, are protected by the Migratory Bird Treaty Act (MBTA) of 1918. Under this legislation, destroying active nests, eggs, and young is illegal. The MBTA generally prohibits the take of migratory birds and their nests and roosting bats are protected under CDFW regulations.

As detailed in the BRA (2021), special-status wildlife species potentially occurring on or in the vicinity of the project area were determined based on a review of the species recorded in the CNDDDB. A list of special-status wildlife species, their status, general habitat requirements, and an assessment of their potential to occur on or in the vicinity of the project area is provided in Table 1 of the BRA (see Appendix B). Five special-status wildlife species, foothill yellow-legged frog (*Rana boylei*), Northern American porcupine (*Erethizon dorsatum*), osprey (*Pandion haliaetus*), red-bellied newt (*Taricha rivularis*), and western pond turtle (*Emys marmorata*) were identified as being documented within five miles of the Site. Based on the biological communities present on the Site and species identified in the search on the CNDDDB, it was determined that the Site provides habitat for nesting birds and raptors, foothill yellow-legged frog and western pond turtle. The remaining species documented in the area (see Table 1 of Appendix B) are not likely to occur due to absence of suitable habitat. Additionally, based on a database query of the CNDDDB and the CNPS Electronic Inventory within a five-mile radius of the project area, five special-status plant species, including Baker's meadowfoam (*Limnanthes bakeri*), Baker's navarretia (*Navarretia leucocephala ssp. bakeri*), Burke's goldfields (*Lasthenia burkei*), North Coast semaphore grass (*Pleuropogon hooverianus*), and Raiche's manzanita (*Arctostaphylos stanfordiana ssp. raichei*) may have the potential to occur in the project area.

Rare plant surveys were conducted by Lucy Macmillan and Anya Peron-Burdick in May and June 2021. No rare plants were identified onsite at the time of the surveys. See Table 3 of the BRA (2021) for a list of all plant species identified on-site during the plant surveys.

The College at the northern end of the Site is developed with multiple buildings, parking lots, various sports facilities, greenhouses, and gardens. South of the College, the Site is largely comprised of undeveloped grasslands in hilly terrain that is currently open space. An existing unimproved maintenance road parallels an existing fence that generally separates open space lands from an area of open space utilized for a Frisbee golf course and walking trails. The northern portion of the Site contains a wetland-stream system, which provides for intermittent flows from the streams west of the proposed roadway to the unnamed tributary to Ackerman Creek east of the proposed roadway, as shown on Plate 1 of the BRA. The tributary appears to drain south to a large stock pond, which drains to Ackerman Creek and, eventually, the Russian River.

The southern portion of the Site contains an existing paved private road that serves approximately four (4) adjacent property owners and connects to Orr Springs Road. The southern portion of the Site contains a large stock pond that outlets to an ephemeral drainage, identified on Plate 2 of the BRA as a southern tributary to Ackerman Creek. The ephemeral drainage generally flows to the southeast to an existing approximately 113-foot long, 24-inch RCP, which outlets to a north-south oriented roadside ditch located perpendicular to Orr Springs Road on the east side of the paved private road. Surface runoff from the paved private road appears to generally drain to the ephemeral drainage and/or roadside ditch. The roadside ditch outlets in an existing 36-inch CMP under Orr Springs Road. Drainage from an existing roadside ditch parallel to Orr Springs Road and an unimproved driveway on the west side of the paved private road is conveyed to the west side of the existing driveway apron and under Orr Springs Road via a 12-inch CMP. The existing 36-inch and 12-inch CMPs outfall to Ackerman Creek from a height approximately 25 feet above the creek surface.

The proposed roadway would begin on the north side of the existing track field at the College then extend south through undeveloped grasslands, until connecting with an existing paved private road at the southern end of the Site, which provides access to Orr Springs Road. As currently designed, the proposed roadway would traverse a portion of the wetland-swale system, requiring drainage improvements, in the central portion of the Site. Within the southern portion of the Site, the approximately 0.02-acre (780-square-foot) roadside ditch would be filled in order to widen the encroachment to Orr Springs Road. Additionally, it is anticipated that 12 oak trees between 6 and 12 inches in diameter at breast height (DBH) and 5 redwood trees between 10 and 30 inches DBH would require removal for expansion of the existing driveway approach near the College. One 8-inch DBH oak tree and one 6-inch DBH manzanita would require removal for the drainage improvements in the southern portion of the Site.

IV.a) As noted above, nesting birds and raptors and two (2) special-status wildlife species, foothill yellow-legged frog (*Rana boylei*) and western pond turtle (*Emys marmorata*), were identified as having the potential to occur onsite and may be affected either directly or indirectly by the proposed project. Additionally, while five (5) special-status plant species were identified as having the potential to occur within the vicinity of the Site, no rare plants were identified onsite at the time of the plant surveys and no impacts are anticipated.

Due to the presence of trees that could provide suitable habitat for nesting bird species adjacent to the proposed project in the northern and southern portions of the Site, there is potential for impacts to nesting birds and raptors. To reduce the potential for take of the nesting birds and raptors, it is recommended that noise and ground disturbance associated with construction within 500 feet of potential nesting habitat occur between September 1 and January 31, outside the nesting season for nesting birds and raptors. If the

seasonal work restrictions are infeasible, pre-construction surveys shall be conducted in accordance with Mitigation Measure BIO-1. Additionally, as noted above, there is the potential for foothill yellow-legged frog and western pond turtle to be present within the project area during construction. To reduce potential impacts to these species, measures such as training for the construction crew, daily site review, and construction scheduling measures such as prohibiting construction during rain events and any time 30 minutes before sunrise or sunset, shall be implemented in accordance with Mitigation Measure BIO-2.

With the incorporation of Mitigation Measures BIO-1 and BIO-2, the project would not 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 CDFW or USFWS based on location of the Site and the surrounding uses. With mitigation incorporated, a less than significant impact would occur.

IV.b) As discussed above, aquatic resources are present on-site, including a wetland-stream system in the northern portion of the Site and an ephemeral drainage in the southern portion of the Site. Construction of the proposed roadway is anticipated to require modifications to the existing wetland-stream system, including the streams and/or the wetland areas. As shown on the Road Improvement Plan exhibits (see Appendix E), culverted crossings of the wetland-stream system would be installed to facilitate the continuation of hydrologic connectivity between the streams west of the proposed roadway and the unnamed tributary to Ackerman Creek to the east of the proposed roadway. Fill within the areas of the crossing would be minimized to the extent feasible; however, impacts within the streams and/or wetlands are anticipated. In the southern portion of the Site, the existing culvert that drains the ephemeral drainage would be replaced and the roadside ditch would be filled to accommodate the widened encroachment to Orr Springs Road. Due to the presence of a wetland-stream system in the northern portion of the Site and the ephemeral drainage in the southern portion of the Site, the proposed modifications may additionally potentially impact existing riparian habitat.

In order to minimize and mitigate for any potential impacts to the wetland-stream system and the ephemeral drainage, the District shall obtain a Lake or Streambed Alteration Agreement (LSAA) through CDFW, a Section 401 Water Quality Certification (WQC) through the North Coast Regional Water Quality Control Board (NCRWQCB), and a Section 404 permit through the U.S. Army Corps of Engineers (USACE), prior to construction of the proposed improvements, if needed, in accordance with Mitigation Measure BIO-3, below. Compliance with the necessary permits will ensure that the project will not result in a loss of waters of the United States or wetlands, by providing mitigation through impact avoidance, impact minimization, and/or compensatory mitigation for the impact, as determined by the resource agencies.

During construction, erosion would be minimized, and runoff would be managed through the implementation of site-specific BMPs detailed in the Erosion and Sediment Control Plan (ESCP) prepared for the proposed project, which includes physical barriers, and controls such as fiber rolls, silt fencing structures, drop inlet protection, sediment barriers, and stabilized construction entrances, and preventative actions such as scheduling construction for the non-rainy season, if possible, soil compaction, and seeding/mulching disturbed areas. Furthermore, as the proposed project will disturb more than one acre of land, it is subject to the requirements of the NPDES General Construction Activity Stormwater Permit (Construction General Permit Order 2009-0009-DWQ, also known as the CGP) of the SWRCB, which requires operators of such construction sites to implement stormwater controls and develop a Stormwater Pollution Prevention Plan (SWPPP) identifying specific BMPs to be implemented during construction to reduce the amount of sediment and other pollutants associated with construction sites from being discharged in stormwater runoff. With mitigation incorporated, a less than significant impact would occur.

IV.c) As discussed above, the project area contains streams, wetland areas, and an ephemeral drainage. According to the BRA, work that would result in a discharge of fill material, including the installation of road culverts, into the streams, wetlands, and/or drainage would require authorization from CDFW, the NCRWQCB and the USACE. Due to the proposed impacts to potentially jurisdictional waters, a Section 404 CWA permit through the USACE, a Section 401 Water Quality Certification from the NCRWQCB, and a Section 1602 Streambed Alteration Agreement from the CDFW shall be obtained from the respective agencies, as required by Mitigation Measure BIO-3 below. With mitigation incorporated, a less than significant impact would occur.

IV.d) The project would not be anticipated to substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Although, according to the BRA, trees on and adjacent to the Site provide potential nesting habitat for a variety of nesting birds and raptors, Mitigation Measure BIO-1, which requires that a qualified biologist conduct a pre-construction survey if construction occurs within the breeding season (February 1 to August 31), would reduce the potential impact to nesting birds and raptors to a less than significant level. With mitigation incorporated, a less than significant impact would occur.

IV.e) During construction of the project, BMPs will be implemented to protect waterbodies from stormwater pollutants due to project construction. Furthermore, the District shall design the project such that it will not result in a loss of water of the United States or wetlands, by providing mitigation through impact avoidance, impact minimization, and/or compensatory mitigation for the impact, as determined by the resource agencies. The project would not conflict with any local policies or ordinances related to the protection of biological resources. A less than significant impact would occur.

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

**MITIGATION MEASURES**

**BIO-1:** If construction activities begin during the nesting season (February 1 to August 31), a qualified biologist shall conduct a preconstruction survey for active nests in suitable nesting habitat within 500 feet of the construction area for nesting raptors and migratory birds. Areas adjacent to the project area that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. The survey shall be conducted by a qualified biologist no more than seven days prior to the initiation of construction. If no active nests are identified during the pre-construction survey, no further mitigation is necessary. If at any time during the nesting season construction stops for a period of seven days or longer, pre-construction surveys shall be conducted prior to construction resuming.

If active nests are found during the survey, the biologist shall establish an appropriate exclusion zone around the nest until the breeding season has ended, or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. This exclusion zone may be modified depending upon the species, nest location, and existing visual buffers. If the nest is too close to the proposed work area, work may be delayed until the young have fledged.

If construction activity is required within the buffer, the nest(s) shall be monitored by a qualified biologist during all construction activities. If the biologist determines that the activity would impact the nest, the biologist shall have the authority to stop work. If the activity is determined to not be disturbing nesting activity,



it may continue under supervision of the biologist. Completion of nesting and fledging activities shall be determined by the qualified biologist.

**BIO-2:** The following measures shall be implemented during prior to and during the active period of construction:

- Prior to construction, all workers on the crew should be trained by a qualified biologist as to the sensitivity of the foothill yellow-legged frog and western pond turtle. If new construction personnel are added to the project, they must receive the mandatory training before starting work.
- No construction activities shall occur during rain events, defined as ¼ inch of rain falling within a 24-hour period. Construction activities may resume 24 hours after the end of the rain event.
- Construction activities shall not be conducted 30 minutes before sunrise or sunset.
- Daily, prior to the start of work, the contractor will check the work area to ensure that no special-status species are within the proposed work zone.

**BIO-3:** Due to the proposed impacts to potentially jurisdictional waters, a Section 404 CWA permit through the U.S. Army Corps of Engineers (USACE), a Section 401 Water Quality Certification from the North Coast Regional Water Quality Control Board (NCRWQCB), and a Section 1602 Streambed Alteration Agreement from the California Department of Fish and Wildlife (CDFW) must be obtained, if required. These permits shall be obtained prior to project construction. The District shall design the project such that it will not result in a loss of water of the United States or wetlands, by providing mitigation through impact avoidance, impact minimization, and/or compensatory mitigation for the impact, as determined by the resource agencies. If it is determined, through obtaining an Approved Jurisdictional Determination, that the aquatic resource features on the Site are not jurisdictional under the federal Clean Water Act, the Section 404 CWA permit shall not be required. Prior to submitting the relevant resource agency permits, the Applicant shall determine the extent of the impact on jurisdictional waters and propose mitigation as follows, to be approved by the relevant resource agencies.

If compensatory mitigation is required, it may consist of: (1) obtaining credits from a mitigation bank; (2) making a payment to an in-lieu fee program that will conduct wetland, stream, or other aquatic resource restoration, creation, enhancement, or preservation activities; and/or (3) providing compensatory mitigation through an aquatic resource restoration, establishment, enhancement, and/or preservation activity. This final type of compensatory mitigation may be provided at or adjacent to the impact site (i.e., on-site mitigation) or at another location, usually within the same watershed as the permitted impact (i.e., off-site mitigation). The project proponent retains responsibility for the implementation and success of the mitigation project.

## **FINDINGS**

The proposed project would have a **Less Than Significant Impact with Mitigation Incorporated** 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 pursuant to §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

Per Chapter 3 (Development Element) of the Mendocino County General Plan (2009), ten (10) Native American tribes historically had territory in what is now Mendocino County. Native American tribes known to inhabit Mendocino County concentrated mainly along the coast and along major rivers and streams, while mountainous areas and redwood groves were occupied seasonally by some tribes. The first permanent non-native settlers came to Mendocino County in the middle of the 16<sup>th</sup> century, exploring and establishing small outposts. It was almost 300 years before the first permanent non-Spanish settlements in Mendocino County were established in April of 1852 on the coast north of Big River. As European-American settlement expanded in Mendocino County, most of the tribes known to inhabit the land were restricted to reservations and rancherias. During the 19<sup>th</sup> century, other tribes from the interior of California were forced to settle on the Round Valley Reservation in the northeastern portion of Mendocino County.

Various County policies exist related to the protection and preservation of cultural and historical resources, in particular Native American sites. These include but are not limited to an archaeological ordinance, adopted as Chapter 22.12 *Archaeological Resources* of the Mendocino County Code (Code, 1987), and Chapter 3 (Development Element) of the Mendocino County General Plan (2009). The archaeological ordinance establishes a County Archaeological Commission that evaluates the potential impacts of proposed projects on archaeological resources and recommends measures to reduce or eliminate impacts on these resources. The ordinance additionally includes the "Discovery Clause," which establishes procedures to follow in the event that archaeological or cultural resources or human remains are unearthed during project construction. These procedures are outlined in Code Sections 22.12.090 and 22.12.100. Both Policy DE-115 of Chapter 3 of the Mendocino County General Plan (2009) and Code Sections 22.12.050 through 22.12.100 (1987) include provisions for archaeological sensitivity review, field evaluations, impact mitigations, archaeological discovery, and human remain discovery protocols.

An Archaeological Survey Report was prepared for the project on April 22, 2022, by Alta Archeological Consulting (ALTA) in order to identify archaeological, historical, and/or cultural resources within the project area. Due to the sensitive and confidential nature of this report, a copy is not included in this Initial Study.

On March 30, 2022, ALTA contacted the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and the contact information for the representatives of the Native American tribes associated with the area. As of the date of this Initial Study, no response has been received from the NAHC.

Using a recent NAHC contact list from a previous project in the general area, a letter requesting information regarding the project area was sent to each contact on March 30, 2022. The District has no record of receiving requests for notification of proposed projects from California Native American tribes pursuant to Public Resources Code Section 21080.3.1. On May 12, 2022, the District nevertheless sent notification and informal consultation letters to five (5) Native American tribes from a list previously provided by the NAHC for similar projects in the area in order to provide the tribes with an opportunity to advise the District of any comments or concerns regarding the project. A letter dated June 9, 2022, received by the District requested formal consultation from the Pinoleville Pomo Nation. Project-related documents were sent to the Pinoleville Pomo Nation for review on June 21, 2022. The Tribe will have the opportunity to review and comment on the Initial Study during the 30-day public review period, and a link to the Initial Study will be provided to the Tribe once the document is posted online for review. As of the date of this Initial Study, no other requests for consultation or any other responses have been received from any of the remaining Tribes that were contacted by ALTA and the District.

Although no requests for further study were received from the NAHC or Native American tribes contacted, ALTA conducted a records search, literature review, and archeological field study. ALTA conducted a records search at the Northwest Information Center (NWIC) located on the Sonoma State University campus on April 5, 2022 (File Number 21-1650). The records search included a review of all study reports on file within a quarter mile radius of the project area. Sources consulted include archaeological site and survey base maps, survey reports, site records, and historic General Land Office (GLO) maps. Review of the historic registers and inventories indicated that no historical landmarks or points of interest are located within the project area. Additionally, no National Register-listed or eligible properties are located within a half mile of the project area. Seven prior cultural resources studies have been performed within a half mile radius of the Site, although no studies have previously occurred within the project area. One prehistoric cultural resource, one historic-era resource, and one informal multicomponent resource have been documented within a half mile of the Site (ALTA, 2022). No cultural resources were identified within the Project Area as a result of the records search or literature review.

On April 6, 2022, ALTA conducted fieldwork, which entailed a cultural resources inventory of the project area and surrounding lands, covering an area of approximately 4.14 acres. Ground surface visibility was generally poor due to low grasses, thistle, and gravelly soils. A total of 15 shovel pits were conducted. Exposed mineral soils were inspected for evidence of cultural materials. One historic-era cultural resource, a collapsed water tower, was identified within the vicinity of the project area as a result of archaeological field survey. One historic-era cultural resource, a collapsed water tower, was identified during the archaeological field survey. If the project can avoid impacting this site, it will not cause a substantial adverse change in the significance of a historical resource, and the project as presently designed is not expected to have an adverse effect on cultural resources.

V.a) The project is not anticipated to have an adverse effect on historical resources. One historic-era cultural resource, a collapsed water tower, was identified during the archaeological field survey. The project is not expected to have an adverse effect on the collapsed water tower as presently designed, and no other historical resources are identified at the Site. However, Mitigation Measure CUL-1, which requires a buffer of ground disturbing activities around sensitive areas, is recommended to ensure the identified cultural resource is not impacted during project construction. With mitigation incorporated, a less than significant impact would occur.

V.b-c) The project is not anticipated to cause a substantial adverse change in the significance of an archaeological resource or disturb any human remains. Although ALTA did not receive responses from the

Native American tribes contacted and further study has not been requested, there is a possibility that an archaeological resource or human remains could be inadvertently discovered due to the ground-disturbing activities required during project construction. The incorporation of Mitigation Measure CUL-2, which requires that the contractor implement standard protocol similar to the County's "Discovery Clause" during project construction, and Mitigation Measure CUL-3, which stops work in the event that human remains are encountered, would ensure that archaeological resources and human remains are not adversely impacted by the proposed project. With mitigation incorporated, a less than significant impact would occur.

#### **MITIGATION MEASURES**

**CUL-1:** Cultural resources present within the project area shall be avoided. Project proponents should ensure that cultural resources are not adversely affected by ground disturbing activities within the sensitive area and buffer (25 feet). If the site cannot be avoided, due to project re-design or otherwise, and ground disturbance is necessary within the recorded site limits and buffer, the site should first be formally evaluated by a qualified architectural historian to determine if it meets the criteria for eligibility, which includes an assessment of the site's integrity, for listing in the CRHR as an historical resource or constitutes a unique archaeological resource (PRC Section 5024.1(c)). If the site is determined to lack integrity or data potential to be considered an historical resource or unique archaeological resource, the project actions can proceed without consideration of the site as a cultural resource. However, if it is determined that the site is an historical resource or unique archaeological resource, and cannot be avoided, then the adverse effects to the resource shall be mitigated through an archaeological data recovery program (ADRP).

**CUL-2:** In the event archaeological resources or cultural resources are inadvertently unearthed or discovered during construction, the contractor shall immediately halt all grading/land-clearing activities and contact the Mendocino-Lake Community College District (District) who will contact a qualified professional archaeologist and a Native American representative. 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. All activity in the vicinity of the resource shall cease until it can be evaluated by a qualified archaeologist and a Native American representative. If the archaeologist and Native American representative determine that the resources may be significant, they shall notify the District and develop an appropriate treatment plan for the resources. The archaeologist shall consult with Native American representatives in determining appropriate treatment for prehistoric or Native American cultural resources. In considering any suggested mitigation proposed by the archaeologist and Native American representative, the District will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) will be instituted, as directed by the archaeologist and Native American representative. Work may proceed in other parts of the project area while mitigation for cultural resources is being carried out.

**CUL-3:** Although unlikely, if human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and the Mendocino 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 can be provided. Work may proceed in other parts of the project area while appropriate treatment of the remains is carried out.

## **FINDINGS**

The proposed project would have a **Less Than Significant Impact with Mitigation Incorporated** 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.

## 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 (CEC) 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).

The proposed project involves the construction of a 24-foot-wide roadway with approximately 10 to 15 feet of shoulder gradings to either side and will be approximately 4,030 feet in length. Associated improvements include upgrades to the existing driveway approaches at the southwest corner of the College and the southern end of the Site, adjacent to Orr Springs Road, and drainage crossing improvements, where required.

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 District is proposing the construction of a secondary access roadway for emergency use to connect the College with Orr Springs Road to the south, not intended to be used for regular access by the students or faculty to reach the campus and that will be gated and accessible only to employees of the Applicant and emergency responders.

The consumption of energy would occur during construction through the use of fossil fuels and electricity in construction equipment and vehicles. Construction would occur during normal business hours, typically 7:00 am to 6:00 pm, Monday through Friday, and would be temporary in nature. The contractor would keep all construction equipment in good working order and would limit idling of vehicles and equipment during construction, in accordance with California Code of Regulations, Title 13, Section 2485: *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling* (adopted 2005), which limits idling from both on-road and off-road diesel-powered equipment and is enforced by the California Air Resources Board (ARB). Therefore, it is anticipated that the construction phase of the project would not result in wasteful, inefficient, and unnecessary consumption of energy.

Operation of the project would not result in an increase energy usage, as the proposed roadway will only be used by employees of the Applicant and emergency responders that currently access the Site via Hensley Creek Road. 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

## DISCUSSION

A *Geotechnical Exploration* was prepared by LACO on September 3, 2021 (see Appendix F), in order to explore the surface and subsurface conditions and develop recommendations related to site preparation and grading, retaining wall foundations, retaining walls, slab-on-grade construction, asphalt pavement, seismic hazards, and construction considerations.



The Site is comprised of developed areas, in the north and south and undeveloped grasslands in the center. The College at the northern end of the Site is developed with multiple buildings, parking lots, various sports facilities, greenhouses, and gardens. South of the College, the Site is largely open space comprised of undeveloped grasslands in hilly terrain. An existing unimproved maintenance road parallels an existing fence that generally separates the open space lands from an area of open space utilized for a Frisbee golf course and walking trails. The southern portion of the Site contains an existing paved private road that serves approximately four (4) adjacent property owners and connects to Orr Springs Road.

As noted in the *Geotechnical Exploration*, on July 23, 26, and 27, 2021, LACO explored subsurface conditions through the advancement of thirteen (13) test pits (TP1 through TP13) to depths ranging from 3.5 to 11.5 feet below ground surface (bgs) and borings (B1 through B16) to depths ranging from 3.5 to 11.5 feet bgs. Exploratory borings B1 through B6 were advanced along the paved access near the College campus in an area that is generally flat to gently sloping (identified as End of Hensley Creek Road at Mendocino College to Station 3+25). Exploratory boring B7 and test pits TP1 through TP13 were advanced in moderately sloping undeveloped terrain located between the track field near the College and the paved driveway located at the southern end of the Site (identified as Station 3+25 to Station 31+00). Exploratory boring B8 through B16 were advanced along a moderately sloping asphalt paved communal driveway accessed from Orr Springs Road (identified as Station 31+00 to Station 41+00). No groundwater was encountered during any of the explorations. Laboratory tests were performed on select soil samples by LACO's materials testing laboratory to evaluate and characterize the soils.

The Site is located in the California Coast Ranges Geomorphic Province, a seismically active and geologically complex province due to historic and ongoing tectonic deformation that is characterized by northwest-trending faults and topographic and geologic features. Potential geologic hazards assessed for the proposed project include the following: slope instability, seismicity, lurching, liquefaction, flooding, and soil swelling or shrinkage potential. The seismicity of the area is dominated by the presence of the San Andreas Fault system, with the nearest potentially active fault being the northern section of the Maacama fault zone, located approximately 1.75 miles east of the Site. However, the Site is not mapped as a special studies zone per the Alquist-Priolo Earthquake Fault Zoning Act and thus the likelihood of surface rupture from a potentially active fault is considered low (LACO, 2021).

Based on the exploration program, the *Geotechnical Exploration* (LACO, 2021) concludes that, from a geotechnical standpoint, the proposed project is feasible. The primary geotechnical concerns at the Site documented for each of the project area sections are as follows:

- End of Hensley Creek Road at Mendocino College to Station 3+25
  - The presence of undocumented fill material; and
  - Weak and porous topsoil extending up to 3 feet bgs.
- Station 3+25 to Station 31+00
  - The presence of undocumented fill material and weak and porous topsoil extending to 2.5 feet below ground surface on sloping terrain;
  - The potential for seasonal high groundwater conditions;
  - The presence of clay soils that exhibit a medium to high potential for expansion; and
  - Areas where hard digging may be encountered.
- Station 31+00 to Station 41+00
  - The presence of weak and porous near-surface soils and undocumented fill extending to a depth of 7.5 feet bgs on sloping terrain;
  - The potential for seasonal high groundwater conditions;
  - Retaining walls may be needed to retain cut and fill slopes; and

- o Areas of hard digging will be encountered.

VII.a.i) The Site is situated within a seismically active area where large earthquakes may be expected to occur during the economic lifespan (50 years) of the project due to the proximity of the proposed project to active seismic sources (the Maacama Fault Zone and San Andreas Fault). However, as the Site is not located within a "Fault Rupture Hazard Zone" or within an area currently designated as a "Seismic Hazard Zone" by the State and based on the distance between the Site and the closest active fault, the Maacama fault zone, the potential for surface rupture at the Site is considered low. A less than significant impact would occur.

VII.a.ii) As noted above, there are no mapped faults or Alquist-Priolo special studies zones traversing the Site. However, since the project area is situated within a seismically active region and given the proximity of significant active faults to the Site, the Site will likely experience strong ground shaking during the economic life span of any development on the Site. The proposed project would be subject to the recommendations contained in the *Geotechnical Exploration* (LACO, 2021) and the latest version of the California Building Code (CBC), to reduce any potential geological risks. Furthermore, the *Geotechnical Exploration* (LACO, 2021) provides several recommendations pertaining to Site development, including Site grading and preparation, retaining wall foundations, retaining walls, slab-on-grade construction, asphalt pavement, and seismic design parameters. These recommendations are included as Mitigation Measure GEO-1, below, in order to reduce potential seismic risks. Mitigation Measure GEO-1 requires compliance with the design recommendations provided in the *Geotechnical Exploration* (LACO, 2021), and with adherence to the requirements of the latest version of the CBC, the proposed project, would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. With mitigation incorporated, a less than significant impact would occur.

VII.a.iii) As noted in the *Geotechnical Exploration* (LACO, 2021), based on soils observed at the Site and geologic maps, the Site has low liquefaction susceptibility. However, as the Site is situated within a seismically active region, the potential exists for seismic-related ground failure at the Site. Provided the recommendations pertaining to Site development, including site preparation and grading, retaining wall foundations, retaining walls, slab-on-grade construction, asphalt pavement, and seismic design parameters provided in the *Geotechnical Exploration* (LACO, 2021) and included as Mitigation Measure GEO-1, below, are adhered to, the potential for substantial adverse effects involving seismic-related ground failure is low. With mitigation incorporated, a less than significant impact would occur.

VII.a.iv) Landslides generally occur on relatively steep slopes and/or on slopes underlain by weak sediments. As noted in the *Geotechnical Exploration* (LACO, 2021), the Site consists of generally flat to gently sloping partially developed terrain from the end of Hensley Creek Road at the College to Station 3+25, moderately sloping undeveloped terrain from Station 3+25 to Station 31+00, and moderately sloping asphalt pavement from Station 31+00 to Station 41+00. The potential for landslides from the end of Hensley Creek Road at Mendocino College to Station 3+25 would be low due to the gentle slopes of the area. The *Geotechnical Evaluation* (LACO, 2021) identifies the presence of undocumented fill material and weak and porous topsoil on sloping terrain from Station 3+25 to Station 31+00 and Station 31+00 to Station 41+00. Given the moderate slopes and soil characteristics identified in these areas, the potential for landslides exists. Provided the recommendations related to site preparation and grading provided in the *Geotechnical Exploration* (LACO, 2021) and included as Mitigation Measure GEO-1, below, the potential for substantial adverse effects involving landslides is limited. With mitigation incorporated, a less than significant impact would occur.

VII.b) Construction projects that would disturb more than one acre of land, such as the proposed project, would be subject to the requirements of the SWRCB CGP (see Section X. Hydrology and Water Quality), which

requires operators of such construction sites to implement stormwater controls and develop a SWPPP identifying specific BMPs to be implemented during construction to reduce the amount of sediment and other pollutants associated with construction sites from being discharged in stormwater runoff. Such BMPs may include, for example, straw bales, fiber rolls, and/or silt fencing structures to assure the reduction in erosion resulting from construction and to avoid runoff into sensitive habitat areas (including the unnamed tributary and downstream watercourses), limit ground disturbance, and stabilize disturbed soil areas as soon as feasible after construction is completed. Compliance with the CGP would facilitate the implementation of water quality control efforts and limit the potential for soil erosion or the loss of topsoil due to the proposed project. A less than significant impact would occur.

VII.c) As discussed previously, although the Site is not located within a mapped Alquist-Priolo special study zone, the Site is located within a seismically active region and would likely experience ground shaking during the economic lifespan of the proposed project. Additionally, the Site consists of moderately sloping undeveloped terrain consisting partially of undocumented fill material and weak and porous topsoil from Station 3+25 to Station 31+00 and Station 31+00 to Station 41+00. Given that these areas contain moderate slopes and the aforementioned soil characteristics and that the Site is in a seismically active area, the potential exists for landslides, lateral spreading, liquefaction, or collapse. Several recommendations were provided in the *Geotechnical Evaluation* (LACO, 2021) in order to minimize and reduce the potential for such risks. Implementation of these recommendations, pursuant to Mitigation Measure GEO-1 would reduce the potential impact to a less than significant level. With mitigation incorporated, a less than significant impact would occur.

VII.d) Expansive soils generally consist of cohesive fine-grained clay soils and represent a significant structural hazard to structures and roads founded on them as they have a tendency to undergo volume changes (shrink or swell) with changes in moisture content. Based on soil classification and laboratory testing, the *Geotechnical Exploration* (LACO, 2021) found that near-surface soils in the areas of TP3 through TP5 and Station 16+00 to Station 34+00 have a medium to possibly high potential to shrink and swell during seasonal moisture variation events. However, with the implementation of Mitigation Measure GEO-1, which requires following the recommendations for site preparation and grading provided in the *Geotechnical Evaluation* (LACO, 2021), the potential for expansive soils creating substantial direct or indirect risks to life or property is limited. With mitigation incorporated, a less than significant impact would occur.

VII.e) The proposed project involves the construction of a secondary access roadway to connect the College to Orr Springs Road. Since the proposed project would not require the use of septic tanks or alternative wastewater disposal systems, no impact would occur.

VII.f) Based on a query of the University of California Museum of Paleontology (UCMP), the majority of paleontological resources found in Mendocino County were located in proximity to the coast. As such, the probability of a unique paleontological resource or site or unique geologic feature at the Site is low. However, as the central portion of the Site is undeveloped grasslands, there is the possibility that unique paleontological resources or sites or unique geologic features could exist on the Site. Mitigation Measure GEO-2, which includes halting construction until the resource can be evaluated and mitigated if needed, has been included to prevent significant impacts on fossils or fossil-bearing deposits in the event they are encountered during project construction. With mitigation incorporated, a less than significant impact would occur.

## **MITIGATION MEASURES**

**GEO-1:** The project shall comply with the recommendations pertaining to site preparation and grading, retaining wall foundations, retaining walls, slab-on-grade construction, asphalt pavement, seismic hazards,

and construction considerations provided in the *Geotechnical Exploration* prepared by LACO Associates and dated September 3, 2021. Prior to construction of the project, the Mendocino-Lake Community College District shall review and approve of the site development plans, which must demonstrate project compliance with the recommendations of the *Geotechnical Exploration* (LACO, 2021), in addition to any seismic requirements of the latest adopted edition of the CBC. In addition, all soil engineering recommendations and structural foundations shall be designed by a licensed Professional Engineer. All on-site geotechnical engineering activities shall be conducted under the supervision of a licensed Geotechnical Engineer or Certified Engineering Geologist.

**GEO-2:** In the event that fossils or fossil-bearing deposits are discovered during project construction, the contractor shall notify a qualified paleontologist to examine the discovery and excavations within 50 feet of the find shall be temporarily halted or diverted. The area of discovery shall be protected to ensure that fossils are not removed, handled, altered, or damaged until the Site is properly evaluated, and further action is determined. The paleontologist shall document the discovery as needed, in accordance with Society of Vertebrate Paleontology standards (Society of Vertebrate Paleontology 1995), evaluate the potential resource, and assess the significance of the finding under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important. The plan shall be submitted to the Northwest Information Center (NWIC) for review and approval prior to implementation.

**FINDINGS**

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

VIII. GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions (GHG), either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input 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 Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, is a State law that establishes a comprehensive program to reduce 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 the AB 32 Scoping Plan (last reviewed in 2018), the California Air Resources Board (CARB) 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>). The 2020 GHG emissions statewide limit set by AB 32, equal to the 1990 level, is 431 million metric tonnes of carbon dioxide equivalent (MMTCO<sub>2e</sub>). In addition, in 2016, Senate Bill (SB) 32 was signed into law to codify the reduction target to reduce GHG emissions to 40 percent below the 1990 levels by 2030 (CARB, 2018).

CARB, in its *California Greenhouse Gas Emissions for 2000 to 2017* (California GHG Emission Inventory), 2019 edition, states that GHG emissions within the State of California have followed a declining trend since 2007. In 2017, statewide GHG emissions were 424 million metric tons of CO<sub>2</sub> equivalent (MMTCO<sub>2e</sub>), 5 MMTCO<sub>2e</sub> lower than 2016 levels and lower than the 2020 statewide GHG limit of 431 MMTCO<sub>2e</sub>. The transportation section remains the largest source of GHG emissions in the State, accounting for 41 percent of the State’s GHG emissions in 2017 (CARB, 2019).

The Site is located within the NCAB and is subject to the requirements of the MCAQMD. The MCAQMD is responsible for monitoring and enforcing federal, state, and local air quality standards in the Mendocino County. As noted in Chapter 4 (Resource Element) of the Mendocino County General Plan (2009), due to the rural nature of Mendocino County, the amount of GHG generated by human activities (primarily the burning of fossil fuels for vehicles, heating, and other uses) is small as compared to other, more urban counties and miniscule in statewide or global terms. However, GHG emissions in Mendocino County are higher per capita due to the distances involved in traveling around the county.

CalEEMod was utilized to quantify potential criteria pollution and GHG emissions associated with construction of the proposed project. The model quantifies direct emissions from construction 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. The results of the CalEEMod analysis in their entirety are included in Appendix D.

According to the CalEEMod results for the proposed project, unmitigated construction activities would result in approximately 251.8106 metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e), and mitigated construction activities would result in approximately 251.8104 metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e). This amount is very small in comparison to the 424 million metric tons of CO<sub>2</sub>e (MMTCO<sub>2</sub>e) emitted statewide in 2017. The generation of direct onsite and offsite GHG emissions would be intermittent and would terminate following completion of construction activities. Furthermore, operational GHG emissions are not expected to increase, as the proposed roadway will only be used by employees of the Applicant and emergency responders that currently access the Site via Hensley Creek Road.

VIII.a) The proposed project would have a less than significant impact on greenhouse gas (GHG) emissions as neither construction nor operation of the project would generate significant amounts of GHGs. As noted above, unmitigated construction activities would result in approximately 251.8106 metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e), and mitigated construction activities would result in approximately 251.8104 metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e), which would account for significantly less than one percent of the State's total 2020 GHG emissions. As discussed under Section III, Air Quality, above, the proposed project would not increase operational emissions of the College. In addition, compliance with MCAQMD standards and regulations, including obtaining all necessary permits for equipment through the MCAQMD, and California Code of Regulations, Title 13, Section 2485: *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling* (adopted 2005), which limits idling of both on-road and off-road diesel-powered equipment and is enforced by the CARB, would limit the potential for GHG emissions during construction. Compliance would require that the contractor keep all construction equipment in good working order and limit idling of vehicles and equipment during construction. Therefore, 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. Action Item RM-50.2 in Chapter 4 of the Mendocino County General Plan (2009) requires the County to "create a greenhouse gas reduction plan for the unincorporated areas of the county that sets specific reduction strategies and targets to meet." 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. 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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, Title 22, Article 3: Characteristics of Hazardous Waste (effective July 1, 1991). A "hazardous waste" includes any hazardous material that is discarded, abandoned, or will be recycled. The criteria that render a material hazardous also

cause a waste to be classified as hazardous, per California Health and Safety Code, Chapter 6.5, Section 25117 (effective January 1, 1997).

The County has adopted numerous plans related to hazard management and mitigation including, but not limited to: Community Wildfire Protection Plan (2015), Multi-Jurisdictional Hazard Mitigation Plan (2021), Hazardous Waste Management Plan (through the California Environmental Reporting System (CERS), 2020), and Operational Area Emergency Plan (2016). On September 13, 2016, the County adopted the *Mendocino County Operational Area Emergency Operations Plan* (County EOP), under Resolution Number 16-119. As noted on the Plans and Publications webpage of the Mendocino County Office of Emergency Services (MCOES), the County EOP, which complies with local ordinances, state law, and state and federal emergency planning guidance, serves as the primary guide for coordinating and responding to all emergencies and disasters within Mendocino County. The purpose of the County EOP is to “facilitate multi-agency and multi-jurisdictional coordination during emergency operations, particularly between the County, local and tribal governments, special districts as well as state and Federal agencies” (MCOES – Plans and Publications, 2019).

The Site does not include any known hazardous waste sites, as mapped by the State Water Resources Control Board (SWRCB) or the California Department of Toxic Substances Control (DTSC) on the GeoTracker (2022) and EnviroStor (2022) databases, respectively, nor are there any listed sites within the vicinity of the Site. The surrounding area contains limited existing development, which includes the College to the north and a few residences to the south of the Site. The Site is located within the State Responsibility Area (SRA), just outside of the service boundaries of the Ukiah Fire Protection District (UFPD) and is served by the California Department of Forestry and Fire Protection (CalFire) (Mendocino County Maps – Ukiah Valley – Fire Responsibility Areas, 2019). The Site is mapped as located within a “Moderate” fire hazard severity zone (CalFire – Fire Hazard Severity Zones Maps Viewer, 2007). The Site is designated as having a “Moderate” exposure to Wildfire per Table 5.5 of the 2020 Mendocino County Multi-Jurisdictional Hazard Mitigation Plan – Volume 2 and is in a rural area within the County’s jurisdiction.

IX.a-b) It is anticipated that the proposed project would not transport, use, emit, or dispose of significant hazardous materials common to medical facilities, such as cleaning supplies, as well as the construction process, or 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. As previously discussed, the proposed project consists of constructing a secondary access roadway from the northwesterly portion of the College to a connection point with Orr Springs Road to the south. During the construction phase, small quantities of hazardous materials common to equipment maintenance and operation, such as gasoline, diesel fuel, hydraulic fluids, oils, and lubricants may be required. However, the types and quantities of 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. Post-construction, the project would require limited maintenance and would not request the use of hazardous materials. A less than significant impact would occur.

IX.c) The College is located at the northern end of the Site, as the proposed project entails the construction of a secondary access roadway intended to serve the College in the event of an emergency. The Site is located within the Ukiah Unified School District (Mendocino County Maps – School Districts, 2014), with the nearest school, Ukiah High School, located approximately 2.5 miles southeast of the Site. It is not anticipated that hazardous materials to be utilized on-site during the construction process would be used or stored at the Site in any quantity or application that could pose a significant risk to the public and/or environment, including existing schools. A less than significant impact would occur.



IX.d) Review of the SWRCB's GeoTracker (2022) and DTSC's EnviroStor (2022) databases indicates that the Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As discussed above, any hazardous materials to be used on-site during the construction process would be minimal and would be utilized, stored, transported, and disposed of in accordance with federal, state, and local regulations. A less than significant impact would occur.

IX.e) The Site is not located within an airport land use plan or within two miles of a public or public use airport. The nearest airport, Ukiah Municipal Airport, is located approximately 5.6 miles southeast of the Site in Ukiah. Therefore, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the proposed project area and no impact would occur.

VIII.f) The proposed development would be compatible with existing surrounding development and would be designed to current standards with suitable road widths and turn radii to accommodate emergency vehicles as the secondary access roadway from the northwesterly portion of the College to a connection point with Orr Springs Road. The proposed roadway is not intended to be used for regular access by the students or faculty to reach the campus and would be gated and accessible only to employees of the College and emergency responders. Existing residential properties in the southern portion of the Site would also continue to have access to the southern roadway to gain access to Orr Springs Road. Construction of the project would benefit emergency response to and evacuations from the College, as it would provide a secondary access route for emergency vehicles. No impact would occur.

VIII.g) As discussed above, the purpose of the proposed project is to provide a secondary access route from the College that could be utilized in the event of an emergency. The College is currently only accessed via Hensley Creek Road, with no alternative route available in the event of an emergency. 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 nearest fire station to the Site is the Cal Fire Ukiah Station located approximately 1.1 miles east of the Site. The proposed secondary access roadway would be constructed in accordance with state and local standards, including safety and emergency access requirements, and would serve as an alternative route for the employees of the Applicant and emergency responders in the event of an emergency. By meeting current standards and design requirements and with sufficient fire protection services available to serve the 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 Hazards or Hazardous Materials.

X. HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input 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 NPDES permit program of the EPA addresses water pollution by regulating point sources that discharge pollutants to waters of the United States. Created in 1972 by the Clean Water Act, the NPDES permit program grants authority to state governments to perform many permitting, administrative, and enforcement aspects of the program. Within California, the NPDES permit program is administered by the SWRCB and the Regional Water Quality Control Boards. In Mendocino County, this is the NCRWQCB.

Construction projects that would disturb more than one acre of land are subject to the requirements of the SWRCB CGP, which requires operators of such construction sites to implement stormwater controls and develop a SWPPP identifying specific BMPs to be implemented during construction to reduce the amount of sediment and other pollutants associated with construction sites from being discharged in stormwater runoff. Such BMPs may include, for example, fiber rolls, silt fencing structures, inlet protection, stabilized construction entrance, and/or concrete waste management to facilitate the reduction in erosion resulting from construction and to avoid runoff into sensitive habitat areas, limit ground disturbance, and stabilize disturbed soil areas as soon as feasible after construction is completed.

Within cities and certain urban areas, discharges of stormwater and non-stormwater from Municipal Separate Storm Sewer Systems (MS4s) are subject to the waste discharge requirements of Phase I or Phase II NPDES Permits, as defined by the SWRCB. The Site is located outside the boundaries of the MS4 areas of the City of Ukiah and the County of Mendocino and is therefore not subject to the requirements of either MS4 area. Projects located outside an MS4 area are subject to the runoff reduction requirements of the CGP. This includes the requirement that the proposed project, through the use of non-structural and structural measures as described in Appendix 2 of the CGP, replicate the pre-project water balance (defined as the volume of rainfall that ends up as runoff) for the smallest storms up to the 85th percentile storm event (or the smallest storm event that generates runoff, whichever is larger). The CGP additionally requires the implementation of post-construction BMPs to reduce pollutants in stormwater discharges that are reasonably foreseeable after all construction phases have been completed.

The Site is located in Zone "X" – area of minimal flood hazard – as shown on Federal Emergency Management Agency's (FEMA) National Flood Hazard Layer FIRMette map numbers 06045C1503F and 06045C1511F, effective June 2, 2011. The Site is located within the Russian River Hydrologic Unit, Upper Russian River Hydrologic Area, Ukiah Hydrologic Subarea and the nearest body of water is Ackerman Creek, which drains to the Russian River. The Russian River is on the SWRCB 303(d) list of impaired waterbodies for water temperature and sedimentation/siltation. The Russian River provides habitat for Chinook salmon and steelhead trout, which are listed as threatened species under the federal Endangered Species Act (City of Ukiah, 2019).

The College at the northern end of the Site is developed with multiple buildings, parking lots, various sports facilities, greenhouses, and gardens. South of the College, the Site is largely open space comprised of undeveloped grasslands in hilly terrain. An existing unimproved maintenance road parallels an existing fence that generally separates the open space lands from an area of open space utilized for a Frisbee golf course and walking trails. On June 14, 2021, Lucy Macmillan and Anya Peron-Burdick conducted a wetland assessment along the proposed roadway, with approximately 50 feet on either side of the proposed road alignment. A wetland area was delineated in the northern portion of the Site, southwest of the College. The extent of the wetland area delineated is shown on Plate 1 of the BRA. The wetlands hydrologically connect flows between the streams west of the proposed roadway with the unnamed tributary to Ackerman Creek east of the proposed roadway. The wetland-stream system provides a bed, bank, and channel for intermittent flows from the upper tributaries west of the proposed roadway to the unnamed tributary to Ackerman Creek east of the proposed roadway.

The southern portion of the Site contains an existing paved private road that serves approximately four (4) adjacent property owners and connects to Orr Springs Road. A pond is located upgradient off the paved private road to the west. The southern portion of the Site contains an ephemeral drainage, which drains in a southerly direction from an existing stock pond towards Orr Springs Road and Ackerman Creek. The channel of the drainage is incised and measures on average 3 to 4 feet side. The ephemeral drainage is identified on

Plate 2 of the BRA as a southern tributary to Ackerman Creek. The ephemeral drainage generally flows to the southeast to an existing approximately 113-foot long, 24-inch reinforced concrete pipe (RCP), which outlets to a north-south oriented roadside ditch located perpendicular to Orr Springs Road on the east side of the paved private road. Surface runoff from the paved private road appears to drain to the ephemeral drainage and/or open-cut ditch. The roadside ditch drains to an existing 36-inch corrugated metal pipe (CMP) that spans Orr Springs Road. Drainage from an existing roadside ditch along Orr Springs Road and an unimproved driveway on the west side of the paved private road is conveyed to the west side of the existing driveway apron and under Orr Springs Road via a 12-inch CMP. The existing 36-inch and 12-inch CMPs outfall to Ackerman Creek from a height approximately 25 feet above the creek surface.

As discussed previously, the proposed project consists of the construction of a 24-foot-wide secondary access roadway from the College to Orr Springs Road. As the proposed roadway would be 4,030 feet in length, construction of the proposed project would disturb an area greater than one acre and as the roadway would be constructed with an asphalt surface, the impervious surface area of the roadway would be approximately 96,720 square feet (or 2.2 acres). The central portion of the proposed roadway would seek to minimize impacts by following the existing contours, and maintaining the existing elevations, to the extent feasible. Constructing the proposed roadway along the existing contours would help to limit the extent of the road prism necessary to achieve the appropriate road design.

Roadway construction would impact a portion of the swales and/or wetland that are hydrologically connected to a northern tributary of Ackerman Creek. The proposed roadway construction would additionally impact a roadside ditch and culvert down-gradient of an ephemeral drainage identified in the southern portion of the Site. Work within this area would include the replacement of the existing 113-foot long 24-inch RCP and an approximately 30-foot-long roadside ditch with a 165-foot long 24-inch RCP that extends to a new circular junction box at the inlet of the existing 36-inch CMP. The approximately 780 square-foot roadside ditch would be filled with approximately 75 cubic yards of road construction materials, including the new 24-inch RCP.

Additional drainage improvements within the southern portion of the Site would direct all stormwater runoff to the proposed circular junction box and existing 36-inch CMP. These improvements include the installation of a new 12-inch RCP under the driveway apron to direct flows from the Orr Springs Road roadside ditch west of the driveway apron to the proposed circular junction box; abandonment of the existing 12-inch CMP under Orr Springs Road; and installation of a new 12-inch HDPE pipe to direct flows from the unimproved driveway west of the paved private road to the proposed circular junction box. No modifications are proposed to the existing 36-inch and 12-inch CMPs under Orr Springs Road.

X.a) The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. As discussed above, construction activities would be subject to the standards of the CGP, which include environmental protection and BMPs designed to prevent, at a minimum, erosion resulting from construction activities and minimize the discharge of sediment and other pollutants associated with construction sites. The *Geotechnical Exploration* (LACO, 2021) notes that no groundwater was encountered during field exploration activities and if construction is performed during the dry months of summer or early fall, groundwater may not be a concern. However, seasonal groundwater levels fluctuate and may rise above the depths explored. Should groundwater be encountered during foundation excavation and/or pier drilling activities, construction shall be performed in accordance with Mitigation Measure HYDRO-1, below, in order to reduce potential impacts to groundwater quality. Additionally, adherence to the post-construction requirements of the CGP would ensure that the

proposed project would comply with applicable water quality standards post-construction. With mitigation incorporated, a less than significant impact would occur.

X.b) The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. As noted above, the proposed project consists of the construction of a 24-foot-wide secondary access road, approximately 4,030 feet in length. The Site is located within the boundaries of the Ukiah Valley groundwater basin (Basin), which encompasses a surface area of 37,500 acres (59 square miles) (Larry Walker Associates, Inc., 2019). The proposed project would not require the use of groundwater supplies and while the project proposes an increase in the impervious surfaces at the Site, the total surface area of the proposed roadway would be approximately 2.2 acres, including portions of the Site that are already comprised of impervious surfaces. Additionally, groundwater recharge would continue to occur in the undeveloped grasslands surrounding the proposed secondary access road. A less than significant impact would occur.

X.c.i-ii) The proposed project would not alter the existing drainage pattern of the Site in a manner that would result in substantial erosion or siltation on- or off-site or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site since any potential runoff from the Site would be controlled in accordance with the parameters of existing regulations. During construction, erosion would be minimized, and runoff would be managed through the implementation of site-specific BMPs detailed in the ESCP prepared for the proposed project, which includes physical barriers, and controls such as fiber rolls, silt fencing structures, drop inlet protection, sediment barriers, and stabilized construction entrances, and preventative actions such as scheduling construction for the non-rainy season, if possible, soil compaction, and seeding/mulching disturbed areas. In addition, post-construction runoff and stormwater flows would be managed through stormwater facilities designed in accordance with the post-construction requirements of the CGP. A less than significant impact would occur.

X.c.iii) As previously discussed, the proposed project would be designed and implemented in accordance with the construction and post-construction requirements of the CGP. While the proposed project would create and replace approximately 2.2 acres of impervious surfaces, the majority of the central portion of the Site would remain as undeveloped grasslands, which would continue to allow for infiltration. In accordance with the requirements of the CGP, the proposed roadway would be designed to replicate the pre-project water balance for the smallest storms up to the 85th percentile storm event (or the smallest storm event that generates runoff, whichever is larger) and to implement post-construction BMPs to reduce pollutants in stormwater discharges that are reasonably foreseeable after all construction phases have been completed.

Additionally, the only existing stormwater drainage system impacted by the proposed project would be the drainage facilities adjacent to Orr Springs Road, which are owned and maintained by the Mendocino County Department of Transportation (DOT). As discussed above, the proposed project's drainage facilities would connect to the existing 36-CMP and would be designed to not exceed the existing capacity. An encroachment permit required to be obtained from DOT would ensure the proposed drainage facilities were appropriately designed. The proposed project would not be anticipated to create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. A less than significant impact would occur.

X.c.iv) As discussed above, the Site is located in Zone "X" – area of minimal flood hazard – as shown on FEMA National Flood Hazard Layer FIRMette map numbers 06045C1503F and 06045C1511F, effective June 2, 2011. On the basis of the FEMA designation, and as provided in the *Geotechnical Evaluation* (LACO, 2021), the risk of flooding occurring at the Site is low (LACO, 2020). No impact would occur.

X.d) The Site is located in central Mendocino County within the City of Ukiah, approximately 28 miles east of the Pacific Ocean, and is therefore not located in a tsunami zone. As noted above, the Site is located in an area of minimal flood hazard (FEMA, 2011). The Site is not located in close proximity to a body of water that is at risk of a seiche. No impact would occur.

X.e) As discussed above, the proposed project would be subject to the construction and post-construction requirements of the CGP. Compliance with the CGP would facilitate the implementation of water quality control efforts in accordance with applicable State requirements. As discussed above, the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge or impede sustainable groundwater management. The proposed project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. A less than significant impact would occur.

#### **MITIGATION MEASURES**

**HYDRO-1:** In the event groundwater is encountered during foundation excavation and/or pier drilling activities, the contractor shall dewater the excavation and/or drilling area prior to placing concrete. Extracted groundwater shall be discharged in a manner that does not cause erosion at the discharge point. Any dewatering activities on-site shall be conducted under the supervision of a Qualified Stormwater Practitioner (QSP).

#### **FINDINGS**

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

XI. LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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**

The Site, identified by APNs 169-020-07, -14, -15, and 156-060-13, -15, and 156-110-35, consists of the College to the north, open space comprised of undeveloped grasslands in hilly terrain south of the College, and an existing paved private road that provides access to Orr Springs Road to the south. The Site is located in Mendocino County but is entirely owned and managed by the District. Pursuant to the Mendocino County General Plan (2009), the parcels identified by APNs 169-020-07 and 169-020-14 have a land use designation of Public Services (PS), while the parcels identified by APNs 156-060-13 and 156-060-15 have a land use designation of Rangelands, 160-acre minimum (RL160). Pursuant to the Mendocino County Zoning Map (2022), the parcels identified by APNs 169-020-07, -14, and -15 have a zoning designation of Public Facilities (PF), while the parcels identified by APNs 156-060-13, -15, and 156-110-35 have a zoning designation of Rangeland, 160-acre minimum (RL:160). No changes to the Site's current land use or zoning designations are proposed. The Site is located within the Ukiah Valley Planning Area and is subject to the Ukiah Valley Area Plan (UVAP, 2011), which has legal land use authority over the unincorporated lands in the Planning Area.

The District is proposing the construction of a secondary access roadway from the College to Orr Springs Road located southwest of the College. The proposed secondary access roadway would be utilized in the event of an emergency requiring secondary access to the College and occasionally for facility maintenance. The College at the northern end of the Site is developed with multiple buildings, parking lots, various sports facilities, greenhouses, and gardens. South of the College, the Site is largely open space comprised of undeveloped grasslands in hilly terrain. An existing unimproved maintenance road parallels an existing fence that generally separates the open space lands from an area of open space utilized for a Frisbee golf course and walking trails. The southern portion of the Site contains an existing paved private road that serves approximately four (4) adjacent property owners and connects to Orr Springs Road.

XI.a) The proposed secondary access roadway would be constructed on property owned by the District and utilized for the College campus (to the north), an unimproved maintenance road (the Site), and an existing driveway (to the south). As the proposed project would be constructed on District-owned property that is not developed with an established community, no impact would occur.

XI.b) The proposed project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect as the project is consistent with all applicable land use plans, policies, and regulations, including the Mendocino County General Plan (2009), the UVAP (2011), and the Mendocino County Zoning Code. The PF and RL:160 zoning designations allow for the construction of essential services, such as the proposed secondary access road, necessary to support principal development. The proposed project would provide the College with an essential secondary access route

that could be utilized by employees of the District, primarily for maintenance purposes, and emergency responders, in the event of an emergency, and no additional development is proposed. In addition, residential properties to the south of the roadway will also have access to a portion of the proposed private roadway to gain access to Orr Springs Road. 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**

The proposed project is not located in an area of known rock, aggregate, sand, or other mineral resource deposits of local, regional, or state residents. There are no known mineral resources of significance on the Site that would be made unavailable by the proposed project. Furthermore, the project Site is not utilized for Surface Mining and Reclamation Act (SMARA) activities.

XII.a-b) The proposed project area does not contain mineral resources that are of value locally, to the region, or to residents of the City, County, or State. According to the Mineral Land Classification Studies Index of the California Department of Conservation (DOC, 2015), the proposed project is not located in an area with known mineral resources. The proposed 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 standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>

**THRESHOLDS OF SIGNIFICANCE:** The project would have a significant effect on noise if it would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of 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

Noise is typically defined as unwanted sound. In any one location, the noise level will vary over time, from the lowest background or ambient noise level to temporary increases caused by traffic or other sources. Acceptable levels of noise vary depending on the land use. Generally speaking, land uses considered noise-sensitive are those in which noise can adversely affect the people performing general activities on the land. For example, a residential land use where people live, sleep, and study is generally considered sensitive to noise because noise can disrupt these activities. Churches, schools, and certain kinds of outdoor recreation are also usually considered noise-sensitive. State and federal standards have been established as guidelines for determining the compatibility of a particular use with its noise environment. The County of Mendocino (County) relies principally on standards in Chapter 3 (Development Element) of the Mendocino County General Plan (2009), the Mendocino County Municipal Code (last updated 2022), the Mendocino County Airport Comprehensive Land Use Plan (ACLUP) (last updated 1996), and the Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP) (last updated 2021) to evaluate noise-related impacts of development.

As provided in Chapter 3 (Development Element) of the Mendocino County General Plan (2009), major noise sources in Mendocino County consist of highway and local traffic, railroad operations, airports, commercial and industrial uses, and recreation and community facilities. Highways with traffic that generates significant noise include Highway 101 and State Routes 1, 20, 128, 162, 253, and 175, which are not in close proximity to the Site.

Policies contained in Chapter 3 of the Mendocino County General Plan (2009) denote the County's standards for maximum exterior noise levels for residential land uses and noise compatibility guidelines for residential, commercial, and industrial land use types. Per Policy DE-100, exterior noise levels for single family homes should not exceed 60 decibels (dBA) during the hours of 7:00 a.m. and 10:00 p.m. and 50 dBA during the hours of 10:00 p.m. and 7:00 a.m. for more than 30 minutes in any hour. Pursuant to Policy DE-102, the

proposed use and the Site's land use designation are not listed in Table 3-K: *Noise Compatibility Guidelines (Expressed as a 24-hour day-night average or Ldn)*. Therefore, the proposed project is not subject to the County's exterior noise compatibility standards.

The Site, currently vacant and undeveloped, is located immediately north of Orr Springs Road and southwest of Hensley Creek Road. Surrounding uses include the College to the north, vineyards to the north, east and south, residences to the south, and undeveloped lands to the west. The proposed project entails the construction of a secondary access roadway from the College to Orr Springs Road.

The noise environment surrounding the Site is influenced by traffic on Orr Springs Road, local traffic associated with surrounding vineyards and residences. Ambient noise levels are relatively low due to the distance between the Site and Highway 101, which is approximately 1 mile east of the Site and buffered by hilly terrain, and surrounding roads (i.e., Orr Springs Road and Hensley Creek Road). Sensitive receptors that could be affected by noise from the Site include the College located immediately to the north and single-family residences located adjacent to the southern portion of the Site.

Construction of the proposed project would generate short-term noise corresponding to the phase of construction and the noise generating equipment used during that phase. Construction activities could involve excavation, grading, trenching, compaction, paving, earth movement, and vehicle travel to and from the Site. Operation of the proposed project would generate minimal noise in nature due to its infrequent use as a secondary access roadway to be primarily utilized in the event of an emergency.

XIII.a) The proposed project would result in a temporary increase in noise levels surrounding the Site during construction but would not be expected to generate operational noise in excess of what currently exists within the general vicinity of the Site. The Site is located in a rural area with limited development. However, three sensitive receptors are located near the Site (within 1,000 feet), including two residences located to the south of the roadway, and the College located immediately to the north. The District has engaged in continual open dialogue with these neighbors during the planning phases of this project and will continue this engagement in pre-construction and construction phases.

Construction of the secondary access roadway, and use of construction equipment would cause temporary increases in noise; however, these impacts would only be associated with construction and would be temporary in nature. Noise would be anticipated as a result of utilizing standard heavy equipment, which may include, but is not limited to the following: excavator, bulldozer, compactor, slip form paver, and backhoe. Given the small size of the project, it is anticipated that the effects of construction noise levels and vibration would be less than significant through the implementation of limiting construction hours within 500 feet of residential uses to the hours of 7:00 a.m. and 7:00 p.m. on weekdays, utilize quiet models of air compressors and other stationary noise sources where technology exists, utilize mufflers on all internal combustion engine-driven equipment, and locate staging areas as far away as possible from noise-sensitive land use areas. These recommendations are included as Mitigation Measure NOISE-1 below, in order to reduce the potential for a substantial temporary increase in ambient noise levels within the vicinity of the proposed project.

Upon build-out, the proposed secondary access roadway, would provide an alternative route to the College in the event of an emergency. As such, operational noise is not anticipated to have an impact on nearby uses due to its infrequent use. With mitigation incorporated, a less than significant impact would occur.

XIII.b) With the exception of minor nearby vibrations created from standard heavy equipment, there are no elements of the proposed project that would create either temporary or permanent ground borne vibrations or noise levels. A less than significant impact would occur.

XIII.c) As previously discussed, the Site is not located within an airport land use plan or within two (2) miles of a public or public use airport. The nearest airport, Ukiah Municipal Airport, is located approximately 5.6 miles southeast of the Site in Ukiah. Therefore, no impact would occur.

#### **MITIGATION MEASURES**

**NOISE-1:** The project shall implement limiting construction hours within 500 feet of residential uses to the hours of 7:00 a.m. and 7:00 p.m. on weekdays, utilize quiet models of air compressors and other stationary noise sources where technology exists, utilize mufflers on all internal combustion engine-driven equipment, and locate staging areas as far away as possible from noise-sensitive land use areas.

#### **FINDINGS**

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

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

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

**DISCUSSION**

Based on the U.S. Census Bureau Quick Facts, Mendocino County had a population of approximately 91,305 persons as of July 1, 2021, a decrease of approximately 0.3 percent, as compared to April 1, 2020. There were an estimated 41,027 housing units as of July 1, 2019, with 2.48 persons per household.

The proposed project entails the construction of a secondary access roadway from the College to Orr Springs Road. The proposed roadway would be primarily utilized as an alternative route for emergency vehicles traveling to/from the College in the event of an emergency. The proposed roadway is not intended to be used for regular access by the students or faculty to reach the College and would be gated and accessible only to employees of the District, primarily for maintenance purposes, and emergency responders.

XIV.a) The proposed roadway would serve as a secondary route to be utilized to access the College in the event of an emergency and would not change the existing or proposed use of the Site or surrounding area. As previously discussed, under Section III (Air Quality), above, for the purposes of this Initial Study, it is assumed that the proposed project would be constructed over an approximately 2-month period from August 2022 to October 2022. Because construction of the project would be temporary in nature, it is anticipated that most, if not all, of the construction workers would be local. As a result, it is not anticipated that the proposed project would increase the population within the area, and no significant infrastructure improvements would be required to serve the project. As such, no impact would occur.

XIV.b). The proposed project would not displace any residents or housing, as the Site is currently vacant, and no residential units are located on-site. As previously discussed, the proposed access route is not intended to be used for regular access by the students or faculty to reach the College and would be gated and accessible only to employees of the College and emergency responders. Existing residential properties in the southern portion of the Site would continue to have access to the southern portion of the roadway to gain access to Orr Springs Road. No impact would occur.

**MITIGATION MEASURES**

No mitigation required.

**FINDINGS**

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

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

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

**DISCUSSION**

There are no elements of the proposed project that would impact the ability of the County or other local services providers to provide public services to the Site or local community. As previously discussed, the proposed project entails the construction of a secondary access roadway from the College to Orr Springs Road, as a secondary route available in the event of an emergency. The proposed secondary access roadway is not intended to be used for regular access by the students or faculty to reach the College and would be gated and accessible only to employees of the District and emergency responders. Existing residential properties in the southern portion of the Site will continue to have access to the southern portion of the roadway to gain access to Orr Springs Road. The proposed roadway and improvements to the existing driveway approaches would be designed to current standards with suitable road widths and turn radii to accommodate emergency vehicles. Since an increase in population within the area is not expected as a result of the proposed project, significant impacts on public services are also not anticipated.

XV.a) As previously discussed, the Site is located within the SRA, just outside of the service boundaries of the Ukiah Valley Fire District (UVFD) and is served by the CalFire (Mendocino County Maps – Fire Responsibility Areas – Ukiah, 2019). The Site is mapped as located within a “High” fire hazard severity zone (Mendocino County Maps – Fire Hazard Severity Map, 2007). The nearest fire station to the Site is the Cal Fire Ukiah Station located approximately 1.1 miles east of the Site, east of Highway 101, at 2690 N State Street.

As previously indicated, the proposed roadway and improvements to the existing driveway approaches would be designed to current standards with suitable road widths and turn radii to accommodate emergency vehicles. The proposed project entails the construction of a secondary access roadway to serve an existing use (the College) and would therefore not necessitate an increase in service needs at the Site. A less than significant impact would occur.

XV.b) Police protection services within the unincorporated area of Mendocino County, including the Site, is provided by the Mendocino County Sheriff's Office (Sheriff's Office). The nearest Sheriff's Office is the Ukiah office, which is located approximately 3.5 miles south of the Site, at 951 Low Gap Road in Ukiah. As the Site is already served by Sheriff's Office and the project entails the construction of a secondary access roadway to serve an existing use (the College), no impact would occur.

XV.c) The Site is located within the Ukiah Unified School District (Mendocino County Maps – School Districts, 2014), with the nearest school, Ukiah High School, located approximately 2.5 miles southeast of the Site. As the proposed project entails the construction of a secondary access roadway to serve an existing use (the College) and the proposed project does not involve the development of any residential units, there would be no increase in the need for school services within the area. No impact would occur.

XV.d-e) As detailed in Section XVI (Recreation), below, four (4) parks and recreational facilities are located within 5 miles of the Site, including Kennwood Drive Park, which is located approximately 2.2 miles northeast of the Site, and Vineyard Park, located approximately 2.8 miles southeast of the Site. As the proposed project entails the construction of a secondary access roadway to serve an existing use (the College) and the proposed project does not involve the development of any residential units, the use of existing park and recreational facilities would not be expected to increase as a result of the proposed project and there would not be a need for a new or physically altered park facility. 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 Site is located within the vicinity of the following neighborhood parks and recreational facilities:

- Kennwood Drive Park, located approximately 2.2 miles northeast of the Site;
- Vinewood Park, located approximately 2.8 miles southeast of the Site;
- Low Gap Park and Low Gap Park – Fit Trail, located approximately 3.6 miles south of the Site; and
- Ukiah Sports Complex, located approximately 4.6 miles southeast of the Site.

XVI.a-b) As discussed above, the purpose of the proposed project is to construct a secondary access roadway from the College to Orr Springs Road, as the College is currently only accessed via Hensley Creek Road, with no alternative route available in the event of an emergency. The proposed roadway is not intended to be used for regular access by the students or faculty to reach the College and would be gated and accessible only to employees of the District and emergency responders. Existing residential properties in the southern portion of the Site will continue to have access to the southern portion of the roadway to gain access to Orr Springs Road. No residential units would be constructed, nor is the population expected to increase, as a result of the proposed project. As a result, the use of existing park and recreational facilities would not be expected to increase as a result of the proposed project. Therefore, there would not be a need for a new or physically altered park or recreational facility. 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**

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law, initiating an update to the CEQA Guidelines to change how lead agencies evaluate transportation impacts under CEQA, with the goal to better measure the actual transportation-related environmental impacts of a given project. Traditionally, transportation impacts had been evaluated by using Level of Service (LOS) analysis. Starting July 1, 2020, lead agencies are required to analyze the transportation impacts of new projects using vehicle miles traveled (VMT), instead of LOS. According to the *SB 743 Frequently Asked Questions* provided by the Governor’s Office of Planning and Research (OPR), VMT measures how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto the roads, the project may cause a significant transportation impact. VMT analysis is intended to promote the state’s goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations (OPR, 2020). On May 20, 2020, Fehr & Peers, on behalf of the Mendocino Council of Governments (MCOG), prepared a *Senate Bill 743 Vehicle Miles Traveled Regional Baseline Study* (SB 743 Baseline Study) to provide an overview of SB 743, summarize VMT data available for Mendocino County, discuss alternatives for and recommend VMT measurement methods and thresholds for lead agencies in Mendocino County, and recommend transportation demand management (TDM) strategies for reducing VMT on projects in Mendocino County.

As previously discussed, the Site is currently accessed via Hensley Creek Road, a two-lane minor arterial road. Currently, this is the only access route to the Site, with no alternate route available in the event of an emergency. One bus stop is located at the College on Hensley Creek Road. As the Site is located in a rural area surrounded by vineyards, undeveloped land, and dispersed rural residences, no dedicated bicycle or pedestrian facilities, including sidewalks, currently exist in the project area. The proposed project includes construction of a secondary access roadway from the College to Orr Springs Road. The proposed roadway is not intended to be used for regular access by the students or faculty to reach the campus and that will be gated and accessible only to employees of the District and emergency responders. Existing residential properties in the southern portion of the Site will continue to have access to the southern portion of the

roadway to gain access to Orr Springs Road. As the proposed roadway will only be used by employees of the District and emergency responders that already access the Site via Hensley Creek Road, VMT are not expected to increase.

XVII.a) The proposed project would not conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. It is expected that construction of the proposed project will result in a slight temporary increase in traffic to and from the Site, as construction workers arrive and leave the Site at the beginning and end of the day, in addition to minor interruption of traffic on adjacent streets when heavy equipment necessary for project construction is brought to and from the Site. However, once construction is complete, the construction workers and equipment would no longer be required at the Site. After completion of construction, the proposed project is not expected to increase traffic, as the proposed roadway will only be used by employees of the District and emergency responders that already access the Site via Hensley Creek Road. As noted above, the Site is located in a rural area with no dedicated bicycle or pedestrian facilities, is not located near existing pedestrian-generating land uses where pedestrians would be anticipated, and would not be expected to attract pedestrians to the Site. The project is not anticipated to substantially impact transit operations or facilities. 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.*

*(2) 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.”*

All project-generated trips would be temporary in nature, ceasing upon completion of construction. As the proposed roadway will only be used by employees of the District and emergency responders that already access the Site via Hensley Creek Road, the proposed roadway is not expected to increase VMT after completion of construction. In addition, as of the date of this Initial Study, the County and the City of Ukiah have not established a threshold with regards to VMT impact significance consistent with CEQA Guidelines Section 15064.3, subdivision (b). As a result, a less than significant impact would occur.

XVII.c) The proposed project is not anticipated to substantially increase hazards due to geometric design features or incompatible uses. As discussed above, the Site is currently accessed via Hensley Creek Road with no alternate route available in the event of an emergency. As demonstrated by the proposed design improvements shown on the attached Site Plan (see Figure 2), the proposed roadway does not include sharp turns or dangerous intersections, and will not be used for incompatible uses. A less than significant impact would occur.

XVII.d) The proposed project will not result in inadequate emergency access, as the project has been designed to increase emergency access to the 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 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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

According to Chapter 3 (Development Element) of the Mendocino County General Plan (2009), ten (10) Native American tribes historically had territory in what is now Mendocino County. Native American tribes known to inhabit Mendocino County concentrated mainly along the coast and along major rivers and streams, while mountainous areas and redwood groves were occupied seasonally by some tribes. The first permanent non-native settlers came to Mendocino County in the middle of the 16<sup>th</sup> century, exploring and establishing small outposts. It was almost 300 years before the first permanent non-Spanish settlements in Mendocino County were established in April of 1852 on the coast north of Big River. As European-American settlement expanded in Mendocino County, most of the tribes known to inhabit the land were restricted to reservations and rancherias. During the 19<sup>th</sup> century, other tribes from the interior of California were forced to settle on the Round Valley Reservation in the northeastern portion of Mendocino County.

The District has no record of receiving requests for notification of proposed projects from California Native American tribes pursuant to Public Resources Code Section 21080.3.1. The District nevertheless sent notification and informal consultation letters on May 12, 2022, to five (5) Native American tribes from a list previously provided by the Native American Heritage Commission (NAHC) for similar projects in the area in

order to provide the tribes with an opportunity to advise the District of any comments or concerns regarding the project. A letter dated June 9, 2022, received by the District requested formal consultation from the Pinoleville Pomo Nation. Project-related documents were sent to the Pinoleville Pomo Nation for review on June 21, 2022. The Tribe will have the opportunity to review and comment on the Initial Study during the 30-day public review period, and a link to the Initial Study will be provided to the Tribe once the document is posted online for review.

In addition to the informal consultation letters sent by the District, efforts to identify tribal cultural resources that could be affected by the project were conducted by Alta Archaeological Consulting, Inc. (ALTA) as part of the preparation of the Archaeological Survey Report (ASR) dated April 22, 2022. These efforts included a search of records at the Northwest Information Center (NWIC), literature review, consultation with the NAHC, notification letters sent to appropriate local Native American tribes, and a pedestrian archaeological survey of the Site.

On March 30, 2022, ALTA contacted the NAHC to request a Sacred Lands File (SLF) search and the contact information for the representatives of the Native American tribes associated with the project area. To date, no response has been received from the NAHC. Using a recent NAHC contact list from a previous project in the area, on March 30, 2022, ALTA sent a letter requesting information regarding the general project to each contact. No responses have been received by ALTA to date.

a.i-ii) As discussed in Section V (Cultural Resources), above, one historic-era cultural resource, a collapsed water tower, was identified during the archaeological field survey. The project is not expected to have an adverse effect on the collapsed water tower as presently designed, and no other historical resources are identified at the Site. However, there are no known tribal cultural resources in the project area. No impact would occur.

#### **MITIGATION MEASURES**

No mitigation required.

#### **FINDINGS**

The proposed project would have **No 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 type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**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 proposed project includes the construction of a secondary access roadway from the College to Orr Springs Road on a currently undeveloped Site, located 4 miles north of Ukiah within an unincorporated area of Mendocino County. According to Chapter 3 (Development Element) of the Mendocino County General Plan (2009):

- PG&E maintains transmission lines throughout the County;
- Various telecommunication companies provide telecommunications to the County; and
- Solid waste from the County is exported to the Potrero Hills Landfill in Solano County because there are no remaining operating landfills in the County.

Although the Site is undeveloped, the College is developed and already serviced for telecommunications, electric power, solid waste, water, and wastewater treatment. Electricity is provided to the Site by Pacific Gas and Electric (PG&E), solid waste management is provided by the County, and water is provided by the Millview County Water District. Wastewater generated on-site is collected by the Ukiah Valley Sanitation

District (UVSD) and treated at the Ukiah Wastewater Treatment Plant (UWWTP), which is owned and operated by the City of Ukiah.

As discussed previously, the proposed project consists of the construction of a 24-foot-wide secondary access roadway from the College to Orr Springs Road. As the proposed roadway would be 4,030 feet in length, construction of the proposed project would disturb an area greater than one acre and as the roadway would be constructed with an asphalt surface, the impervious surface area of the roadway would be approximately 96,720 square feet (or 2.2 acres). However, the proposed project would be designed and implemented in accordance with the construction and post-construction requirements of the CGP. While the proposed project would create and replace approximately 2.2 acres of impervious surfaces, the majority of the central portion of the Site would remain as undeveloped grasslands, which would continue to allow for infiltration. Additionally, the only existing stormwater drainage system impacted by the proposed project would be the drainage facilities adjacent to Orr Springs Road, which are owned and maintained by the Mendocino County Department of Transportation (DOT). Surface runoff from the existing paved private road currently is conveyed via a 24-inch (RCP) running under the paved private road and sheet flow, respectively, to a north-south oriented open-cut ditch on the east side of the paved private road, then under Orr Springs Road via an existing 36-inch (CMP). Drainage from an existing roadside ditch along Orr Springs Road and the unimproved driveway on the west side of the paved private road is conveyed to the west side of the existing driveway apron and under Orr Springs Road via a 12-inch CMP. The existing 36-inch CMP and 12-inch CMP outfall to Ackerman Creek from a height approximately 25 feet above the creek surface.

In accordance with the requirements of the CGP, during construction, BMPs would be implemented to prevent the discharge of construction waste, debris, or contaminants from construction materials, tools, and equipment from leaving the Site. Additionally, the proposed roadway would be designed to replicate the pre-project water balance for the smallest storms up to the 85th percentile storm event (or the smallest storm event that generates runoff, whichever is larger) and to implement post-construction BMPs to reduce pollutants in stormwater discharges that are reasonably foreseeable after all construction phases have been completed.

XVIX.a) As discussed above, the infrastructure necessary for drainage would be installed as part of the proposed project; however, in order to ensure significant environmental effects would not occur, the respective installers would implement applicable BMP) to reduce the potential for impacts to occur, including but not limited to erosion during construction. Although the Site is undeveloped, the College is developed and already serviced for telecommunications, electric power, solid waste, water, and wastewater treatment, and therefore does not require relocation or construction of new utility facilities. A less than significant impact would occur.

XVIX.b) As discussed above, the proposed project involves the construction of a secondary access roadway, and therefore, is not anticipated to need water. No impact would occur.

XVIX.c) As discussed above, the proposed project involves the construction of a secondary access roadway, and therefore, is not anticipated to generate wastewater. No impact would occur.

XVIX.d-e) A significant amount of solid waste is not anticipated under the proposed project and all solid waste generated, as anticipated during construction, would be disposed of in accordance with all federal, state, and local statutes and regulations related to solid waste, including state and local waste diversion requirements. A less than significant 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 checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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**

On September 13, 2016, the County adopted a *Mendocino County Operational Area Emergency Operations Plan* (County EOP), under Resolution Number 16-119. As noted on the Plans and Publications webpage of the MCOES, the County EOP, which complies with local ordinances, state law, and state and federal emergency planning guidance, serves as the primary guide for coordinating and responding to all emergencies and disasters within the County. The purpose of the County EOP is to “*facilitate multi-agency and multi-jurisdictional coordination during emergency operations, particularly between Mendocino County, local and tribal governments, special districts as well as state and Federal agencies*” (MCOES – Plans and Publications, 2019).

The Site is located within the SRA, just outside of the service boundaries of the UVFD and is served by the CalFire (Mendocino County Maps – Fire Responsibility Areas – Ukiah, 2019). The Site is mapped as located within a “High” fire hazard severity zone (Mendocino County Maps – Fire Hazard Severity Map, 2007). The nearest fire station to the Site is the Cal Fire Ukiah Station located approximately 1.1 miles east of the Site, east of Highway 101, at 2690 N State Street. As the Site is located within the SRA, the project is required to comply with the Fire Safe Regulations adopted by the State Board of Forestry in Title 14 of the California Administrative Code. These include standards for roads, defensible space, and an emergency water supply. As previously discussed, the proposed project entails the construction of a secondary access roadway intended to serve the College in the event of an emergency, such as a wildfire.

XX.a) As discussed under Section IX (Hazards and Hazardous Materials), above, there are no components of the proposed project that would impair an adopted emergency response plan or emergency evaluation plan, including the adopted County EOP. The Site is located with the SRA and is designated as having a "Moderate" exposure to Wildfire per Table 5.5 of the 2020 Mendocino County Multi-Jurisdictional Hazard Mitigation Plan – Volume 2. The proposed secondary emergency access roadway would be constructed in accordance with state and local standards, including safety and emergency access requirements. As such, there are no components of the project that would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. A less than significant impact would occur.

XX.b) Under the proposed project, it is not anticipated that wildfire risks would be exacerbated due to slope, prevailing winds, and other factors. The Site consists of developed areas in the north and south and undeveloped grassland in hilly terrain in the center, with elevations at the Site ranging between approximately 690 feet and 830 feet above mean sea level. In addition, the Site is located in a rural area with limited development where there is a moderate threat of wildfire. As noted above, the proposed project entails constructing a secondary access roadway with restricted use. The proposed roadway would be gated and accessible only to employees of the District, primarily for maintenance purposes, and emergency responders in the event of an emergency, such as a wildfire. The roadway itself would not exacerbate wildfire risk due to the nature of the project and would facilitate a reduction of potential wildfire risk to occupants of the College by providing a secondary roadway that could be utilized in the event of an emergency. In addition, this roadway will act as a defensible fire break in the open space rangeland. A less than significant impact would occur.

XX.c) The Site is currently vacant and undeveloped, and the proposed project entails the construction of a secondary access roadway from the College to Orr Springs Road for emergency use. No additional infrastructure or connections would be warranted on-site. As such, the proposed 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. No impact would occur.

XX.d) The proposed project 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, as the Site is located in a rural area with limited development and would be constructed in accordance with the construction and post-construction standards of the SWRCB CGP. As discussed in Section X (Hydrology and Water Quality), compliance with the CGP would ensure stormwater runoff from the proposed roadway is properly managed to prevent downstream flooding or drainage challenges. A less than significant impact would occur.

#### **MITIGATION MEASURES**

No mitigation required.

#### **FINDINGS**

The proposed project would have a **Less than Significant 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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**

Certain mandatory findings of significance must be made to comply with CEQA Guidelines §15065. The proposed project has been analyzed and it has been determined that it would not:

- Substantially degrade environmental quality;
- Substantially reduce fish or wildlife habitat;
- Cause a fish or wildlife population to fall below self-sustaining levels;
- Threaten to eliminate a plant or animal community;
- Reduce the numbers or range of a rare, threatened, or endangered species;
- Eliminate important examples of the major periods of California history or pre-history;
- Achieve short term goals to the disadvantage of long term goals;
- Have environmental effects that will directly or indirectly cause substantial adverse effects on human beings; or
- Have possible environmental effects that are individually limited but cumulatively considerable when viewed in connection with past, current, and reasonably anticipated future projects.

Potential environmental impacts from the construction of the proposed secondary access roadway have been analyzed in this document and mitigation measures have been included in the document to ensure impacts would be held to a less than significant level.

XXI.a) The project does not 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. The historical resource found on-site will be avoided by design. While the Site contains a wetland-stream system and an ephemeral drainage that drains to tributaries to Ackerman Creek and contains potential habitat for listed wildlife species, the Site was not found to contain any special status plant species. Mitigation has been applied to reduce any potential environmental impacts to biological resources and water quality to levels that are less than significant.

XXI.b) No cumulative impacts have been identified as a result of the proposed project. The project is intended to serve an existing use provide the Ukiah Mendocino College campus with a secondary access roadway for emergency use. Individual impacts from construction of the project would be mitigated, as needed, and would not significantly contribute to cumulative impacts in the area. A less than significant impact would occur.

XXI.c) The project will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly. Concerns related to the suitability of soils on-site for this type of construction would be mitigated by Mitigation Measures GEO-1 and GEO-2, which reduce the threat of failure of the proposed roadway structure to a level that is less than significant and concerns related to the impact of construction noise on nearby sensitive receptors are mitigated by Mitigation Measure NOISE-1. A less than significant impact would occur.

#### **MITIGATION MEASURES**

Refer to Mitigation Measures BIO-1 through BIO-3 in Section IV (Biological Resources), CUL-1 through CUL-3 in Section V (Cultural Resources), GEO-1 and GEO-2 in Section VII (Geology and Soils), HYDRO-1 in Section X (Hydrology and Water Quality), and NOISE-1 in Section XIII (Noise), above.

#### **FINDINGS**

The proposed project would have a **Less Than Significant Impact with Mitigation Incorporated** on Mandatory Findings of Significance.

## VI. REFERENCES

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## FIGURES

**Figure 1**

**Location Map**

**Figure 2**

**Site Plan**

# APPENDIX A

## **Photo Log**

## APPENDIX B

### **Biological Resources Assessment**

## APPENDIX C

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

## APPENDIX D

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

## APPENDIX E

### **Road Improvement Plans**

# APPENDIX F

## **Geotechnical Exploration**