INITIAL STUDY and ENVIRONMENTAL CHECKLIST

FOR

WILLOW COUNTY WATER DISTRICT WATER MAIN REPLACEMENT PROJECT

January 2025

Lead Agency:
Willow County Water District

Prepared by:
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LACO Project No. 7606.08

State Clearinghouse Number:

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I. PROJECT SUMMARY

Date: January 2025

Project Title: Willow County Water District Water Main Replacement Project

Lead Agency: Willow County Water District

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Location: The proposed project is located on Laws Avenue, Pomo Lane, and Canyon Drive, west of Highway 101 and west and south of the Ukiah Municipal Airport within the County of Mendocino rights-of-way. The Laws Avenue water main extends east/west from the east to its junction with South Dora Street, west of the Ukiah Municipal Airport. The Pomo Lane water main extends along the entirety of Pomo Lane between Bethal Lane and Townsend Lane. The Canyon Drive water main begins approximately 150 feet west of its junction with Rosemary Lane, extending west along Canyon Drive into adjacent private properties located southwest of Ukiah, in Mendocino County, California (Site). See Figure 1 for the overview of the project location.

Coastal Zone: No

Anticipated Permits and Approvals:

1) Approval of Improvement Plans for the project by the Willow County Water District Board of Directors
2) Section 401 Water Quality Certification through the North Coast Regional Water Quality Control Board (NCRWQCB)

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 Tribes 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 Willow County Water 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)).

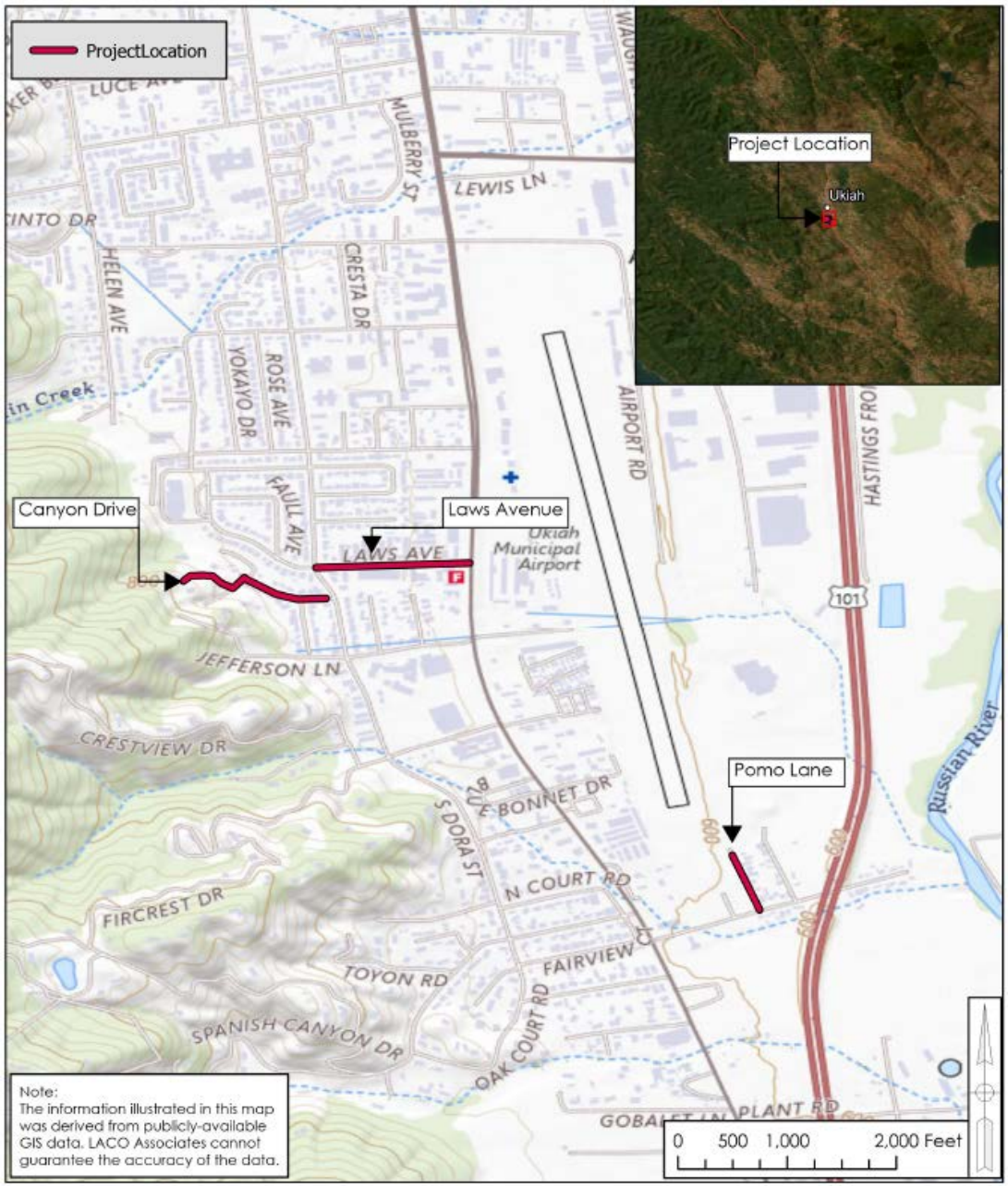
Section 15063(d) of the State CEQA Guidelines states that an IS shall contain the following information in brief form:

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 Willow County Water District (District) is proposing to replace three sections of water main located at Laws Avenue (1,000 linear feet), Pomo Lane (550 linear feet), and Canyon Drive (1,000 linear feet) (Project) located south and west of the City of Ukiah in Mendocino County, California. These proposed improvements would occur within existing road rights-of-way. See Figure 1 *Location Map* below for the mapped locations of the proposed water main replacements.

Figure 1: Location Map



The Project consists of the following improvements:

- Laws Avenue – Approximately 1,000 linear feet of 8-inch steel water main would be abandoned and replaced with new 8-inch steel water main (See Figure 2 *Laws Avenue Water Main* Below).

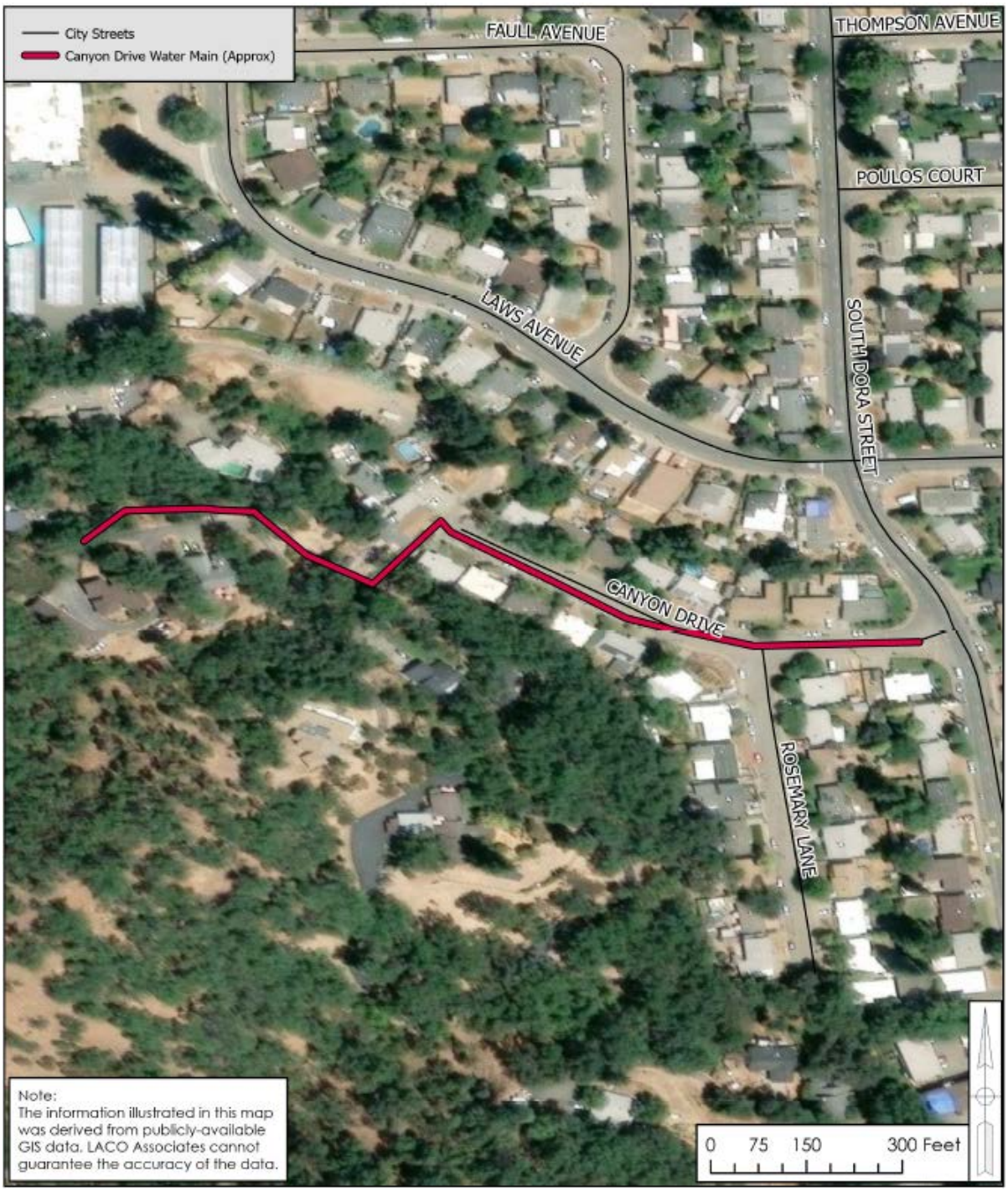
Figure 2: Laws Avenue Water Main

- Pomo Lane – Approximately 550 linear feet of 4-inch steel water main would be abandoned and replaced with new 4-inch steel water main (See Figure 3 *Pomo Lane Water Main* Below).

Figure 3: Pomo Lane Water Main

- Canyon Drive – Approximately 1,000 linear feet of 4-inch steel water main would be abandoned and replaced with new-inch steel water main (See Figure 4 below).

Figure 4: Canyon Drive Water Main



Construction

The Project is anticipated to start construction in early 2025 and take approximately three (3) months to complete. The water mains will be constructed using open trench excavation. Construction includes the following phases: trenching, installation of piping, backfill, and pavement restoration. Open trench excavation consists of digging down to and exposing the existing pipe (trenching), disconnecting the existing pipe and installing new pipe alongside the old pipe and connecting it to the rest of the system (installation of piping), and then filling the trench back up with the material removed in the first step (backfill).

The work includes the following steps:

- Sawcut pavement and dig trench to install new sewer main
- Install new mainline sewer pipes
- Cover open trenches with steel plates at the end of each day as needed while work is in progress
- Backfill trenches with sand or gravel and apply temporary asphalt patches
- Conduct quality control inspections

The project is estimated to disturb a total of 7,650 square feet of land including:

- Laws Avenue: 3,000 square feet (1,000 linear feet by 3 feet wide)
- Pomo Lane: 1,650 square feet (550 linear feet by 3 feet wide)
- Canyon Drive: 3,000 square feet (1,000 linear feet by 3 feet wide)

The expected construction equipment type and numbers of days in use for the project are as follows:

Table 1: Project Construction Equipment Estimates

Equipment Type	No. on Site	No. of Working Days In Use
Excavator, bobcat	1	1 month

Staging areas are not yet identified in the project plans, however this analysis assumes staging would occur in already developed areas and would not require ground disturbance or tree trimming/removal. Public road or lane closures are anticipated to accommodate the proposed construction. The contractor will be required to prepare a temporary traffic control plan to divert traffic, pedestrians, and bicycles from work areas within existing streets.

Normal construction hours would be limited to 7:00 AM to 7:00 PM Monday through Friday with no construction on Saturday or Sunday unless prior approval is granted, consistent with Mendocino County's noise regulations for construction hours (Municipal Code Title 20 Zoning Ordinance Appendix C – Exterior Noise Limit Standards).

Purpose and Need

The purpose of the Project is to support water conservation efforts through the replacement of existing steel water mains that have reached the end of life and pose consistent system maintenance issues. The District has received funding from the Integrated Regional Water management Program (IRWM) through the North Coast Resources Partnership (NCRP) to design and implement water main replacements to support water conservation projects.

III. PROJECT SETTING AND LOCATION

The Project is located in Ukiah, Mendocino County, California, in three locations Laws Avenue, Pomo Lane, and Canyon Drive. The Laws Avenue water main extends from the eastern end of Laws Avenue to its junction

with South Dora Street, west of the Ukiah Municipal Airport. The Pomo Lane water main extends along the entirety of Pomo Lane between Bethal Lane and Townsend Lane. The Canyon Drive water main begins approximately 150 feet west of its junction with Rosemary Lane, extending west along Canyon Drive into adjacent private properties (See Figure 1 *Location Map* above).

The following environmental setting is generally based on the *Biological Resources Survey* (BRS) prepared by Area West Environment, Inc. (AWE) dated April 12, 2024, to analyze potential of sensitive biological resources to occur on the Site. Aquatic resources on-site were determined by AWE, as described in the BRS through a combination of review of background materials and a field visit. No wetlands or other potentially jurisdictional aquatic resources were identified within the Site. However, there is an intermittent stream that runs along the back of private homes north of Canyon Drive. Water was present in the intermittent waterway, which is dominated by curly dock (*Rumex crispus*) and summer snowflake (*Leucojum aestivum*) with an overstory of dense woody vegetation. This stream has a hydrologic connection to the Russian River.

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 BRS (2024), 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 (CNDDB) of CDFW, Information for Planning and Consultation (IPAC) of the United States Fish and Wildlife Service (USFWS), and the California Native Plant Society (CNPS) Rare Plant Inventory. 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 Attachment 1 of the BRS (see Appendix C). No special-status species were encountered during the surveys conducted on April 1, 2024, and June 17, 2024. No federally or state-listed species would potentially be affected by the Project.

The Project is located in a residential area in the City of Ukiah in Mendocino County and is set in the right of way of Laws Avenue, Canyon Drive, and Pomo Lane. The Site is surrounded by residential development with deciduous woodlands present at the western end of Canyon Drive and undeveloped annual grassland west of Pomo Lane.

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
	Biological Resources	X	Cultural Resources		Energy
X	Geology/Soils		Greenhouse Gas Emissions		Hazards & Hazardous Materials
	Hydrology/Water Quality		Land Use/Planning		Mineral Resources
X	Noise		Population/Housing		Public Services
	Recreation		Transportation		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 A.

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)

☐	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☒	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.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	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.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Jared Walker, General Manager
Name and Title

I. **AESTHETICS**. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d) 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 southwest of the city of Ukiah, is largely existing rights-of-way surrounded by existing residential development. The Site is located within roadway right of ways identified as Laws Avenue, Canyon Drive, and Pomo Lane.

Under the Project, the existing water mains in these three sections will be replaced. The area above and beside the existing water mains will be excavated, new sections of water main will be laid next to the existing and tied into the system. Once the new sections of the water main are installed, the excavated pits will be backfilled, and pavement repaired. No changes to the grade, width, or general design of the streets will be made. 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, however, the Site's location is within an urban environment with residential development. Surrounding uses include single-family residential, some commercial, and public services.

Laws Avenue runs east to west from South State Street to South Dora Street includes two-story apartment complexes and some single-family residences along the north and south sides of the street with public services such as the Millview County Water District and the Ukiah Valley Fire District offices located on the south side of Laws Avenue.

Canyon Drive runs southeast to northwest from South Dora Street to a dead end. The existing development includes single-story single-family residential dwellings along the northern and southern sides of the street.

Pomo Lane is located immediately south of the Ukiah Municipal Airport running south from Norgard Lane to the north where it dead ends. There is a mix of residential development located on the east side of the road with the west side left undeveloped. The project would not be anticipated to degrade the existing visual character or quality of public views of the Site and its surroundings as the Project would replace existing, underground water lines and the pavement would be repair once installation is complete. As such, no 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 no temporary or permanent lighting is required to complete the project. As such, no impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed project would have a **No 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

DISCUSSION

The proposed project is located south and west of the City of Ukiah in an area designated as Urban and Built-up Land by the California Department of Conservation Farmland Mapping and Monitoring Program (DOC, 2024) and is not currently under a Williamson Act Agricultural Preserve Contract (Mendocino County Maps – Timber Production and Williamson Act Lands, 2024). The project sites are within street rights-of-way and therefore have no official land use or zoning designations.

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 Sites are located within the rights-of-way of streets and therefore have no official land use or zoning designations. There is neither designated nor zoned as forest land or timberland. 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, the replacement of three water mains, 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) 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_3), carbon monoxide (CO), oxides of nitrogen (NOx), lead (Lb), sulfur dioxide (SO_2), particulate matter less than 10 microns in size (PM_{10}), and particulate matter less than 2.5 microns in size ($PM_{2.5}$), are shown below in Table 2. 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_2S). These standards are based on observable short-term (acute) health effects (MCAQMD, 2005).

Table 2 - 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/m³)
	8 hour	0.07 ppm (137 μg/m³)	0.07 ppm (137 μg/m³)
Carbon Monoxide	1 hour	35 ppm (40,000 μg/m³)	20 ppm (23,000 μg/m³)
	8 hour	9 ppm (10,000 μg/m³)	9.0 ppm (10,000 μg/ m³)
Nitrogen Dioxide	1 hour	100 ppb (188 μg/m³)	0.18 ppm (339 μg/m³)
	Annual	0.053 ppm (100 μg/m³)	0.03 ppm (57 μg/m³)
Sulfur Dioxide	1 hour	75 ppb (196 μg/m³)	0.25 ppm (655 μg/m³)
	3 hour	NA	NA
	24 hour	0.14 ppm	0.04 ppm (105 μg/m³)
	Annual	0.03 ppm	NA
Particulate Matter (PM_{10})	24 hour	150 μg/m³	NA
	Annual	12.0 μg/m³	12 μg/m³
Sulfates	24 hour	NA	25 μg/m³
Lead	30 day	NA	1.5 μg/m³
	Calendar Quarter	1.5 μg/m³	NA
Hydrogen Sulfide	1 hour	NA	0.03 ppm (42 μg/m³)
Vinyl Chloride	24 hour	NA	0.010 ppm (26 μg/m³)

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_{10}, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 μg/m3 is equal to or less than one. For $PM_{2.5}$, 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.
b California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded.
c ppm = parts per million by volume; μg/m3 = micrograms per cubic meter.
NA: Not Applicable.

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_{10}, 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_{10} standard and the 24-hour PM_{10} standard. The California Clean Air Act does not require attainment plans or transportation conformity for districts that exceed the PM_{10} 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_{10} levels. While PM_{10} 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_{10} 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 3, below.

Table 3. MCAQMD Significance Thresholds

Criteria Pollutant and Precursors	Average Daily Emissions (lb/day)	Maximum Annual Emissions (tons/year)
ROG	180	40
NO_x	42	40
PM_{10}	82	15
$PM_{2.5}$	54	10
Fugitive Dust (PM_{10}/$PM_{2.5}$)	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.

As previously discussed, the Sites are located underground within rights-of-way of Laws Avenue, Canyon Drive, and Pomo Lane. The surrounding areas generally contain commercial and residential uses.

Emissions from the proposed project would be comprised of direct and indirect emissions. would be limited as the operation of water infrastructure requires a system to pump water within the system. The pump system indirectly generates a nominal amount of criteria air pollutants through normal operations. During construction at the Sites, 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 construction, 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.

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_{10}, the only criteria pollutant for which the project region is in non-attainment (MCAQMD, 2005).

The proposed project consists of the installation of water main facilities. 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_{10} within the vicinity of the Site. 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_{10} 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). Sensitive residential receptors are located all around the project sites. Project-related construction activities would emit PM2.5 from equipment exhaust. Nearly all the projects PM2.5 emissions would come from equipment exhaust (diesel particulate matter).

Water main installation is expected to disturb a total of 7,650 square feet to install 2,550 linear feet of water main. The installation is expected to progress at approximately 100 to 200 feet of installed water main per day. Sensitive receptors such as the neighboring residences along the water main alignment would not be exposed to substantial pollutant concentrations during constructions (such as equipment and vehicle exhaust) This finding is based on the anticipated amount of equipment required for water main, trenching, installation, and repaving, and taking into account that construction vehicles and equipment would remain near any one location for a relatively short time; typically from one to 5 days as construction progresses.

As noted above, the project would not require demolition activities, extensive site preparation, material transport (i.e., greater than 10,000 cubic yards of soil import/export), or the simultaneous occurrence of more than two construction phases (e.g., grading and trenching and building construction, grading and paving and trenching).

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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☐	☐	☒

DISCUSSION

As previously described, the Project involves the installation of 2,550 linear feet of watermain consisting of open trench excavation, installation of new watermain segments alongside the old watermain (to be abandoned in place), backfill, and pavement restoration. Construction activities will occur at Laws Avenue, Pomo Lane, and Canyon Drive. As detailed in the BRS the Project Site is surrounded by residential development with deciduous woodlands present at the western end of Canyon Drive and undeveloped annual grassland west of Pomo Lane (AWE, 2024).

The following environmental setting is generally based on the Biological Resources Survey (BRS) dated April 12, 2024, and prepared by Area West Environmental, Inc. (AWE) (See Appendix A). No wetlands or other potentially jurisdictional aquatic resources were identified within the Project site. However, there is an intermittent stream that runs along the back of private homes north of Canyon Drive. The BRS recommends this area be designated as an Environmentally Sensitive Area on project plans to further instruct the contractor to avoid this feature. No special-status species were observed within the Project Site during the April 12, 2024, survey nor the follow up survey conducted on June 17, 2024.

IV.a) The BRS conducted background data research prior to field survey utilizing the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC), California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB), and the California Native Plant Society (CNPS)

Inventory of Rare and Endangered Plants. These database searches were utilized to determine which rare plant and animal species have been documented in the vicinity of the Project Site.

As noted above, no special-status species were observed within the Project Site during the April 12, 2024, and the June 17, 2024, surveys. Due to the lack of presence of special-status species, and the developed nature of the Project Sites, a less than significant impact would occur.

IV.b,c,d) As discussed above, no wetlands or other potentially jurisdictional waters are located within the Project Sites. However, an intermittent stream that runs along the back of private homes north of Canyon Drive was identified. In adherence with the recommendation in the BRS, the project is required to designate this area as an Environmentally Sensitive Area and will avoid disturbance to this feature. During construction of the project on Canyon Drive, BMPs will be implemented to protect waterbodies from stormwater pollutants due to project construction. With adherence to the recommendation in the BRS, a less than significant impact would occur.

IV.e) Project related runoff via roadside storm drains within the project site boundaries has the potential to indirectly impact biological resources. Such an impact would conflict with the Ukiah Valley Area Plan or Mendocino County General Plan Goals and Policies related to protecting habitat for special-status species. 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

No mitigation required.

FINDINGS

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

V. **CULTURAL RESOURCES**. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) 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 16th 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 19th 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 March 8, 2024, 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 January 30, 2023, 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. The NAHC responded on February 7, 2024, indicating that a search of the SLF returned a positive result and the NAHC suggested contacting the Pinoleville Pomo Nation for further information. On January 30, 2024, a letter was sent to the Tribal Historic Preservation Officer (THPO) or appropriate representative of each tribal group associated with the Site. Additionally, the Pinoleville Pomo Nation was contacted by phone on February 12, 2024, by ALTA. On July 23, 2024, LACO reached out to the Pinoleville Pomo Nation on behalf of the District via email requesting additional information as suggested by

the NAHC. To date no response has been received. 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 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 February 6, 2024 (File Number 22-1565). 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 quarter mile of the project area. Thirteen prior cultural resources studies have been performed within a quarter mile radius of the Site, although no studies have previously occurred within the project area. One historic-era cultural resource and two ancestral Native American cultural resources have been documented within a quarter-mile radius of the Site (Alta, 2024). No cultural resources were identified within the Project Area as a result of the records search or literature review.

On February 19, 2024, ALTA conducted fieldwork, which entailed a cultural resources inventory of the project area and surrounding lands, covering an area of approximately 2.86 acres. Ground surface visibility was generally poor due to imported gravel for the roadway, asphalt, concrete sidewalks, and dense grasses. A total of 11 shovel pits were conducted. Exposed mineral soils were inspected for evidence of cultural materials. No cultural resources were identified within the Site as a result of the records search, literature review, Native American outreach, or archaeological field survey (Alta, 2024).

V.a) The project is not anticipated to have an adverse effect on historical resources. One historic-era cultural resource, a railroad, known as the Northwest Pacific Railroad, and two ancestral Native American cultural resources was identified within a quarter mile of the Site during the records search. The project is not expected to have an adverse effect on the railroad or Native American cultural resources as presently designed, and no other historical resources are identified at the Site. 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-1, which requires that the contractor implement standard protocol similar to the County's "Discovery Clause" during project construction, and Mitigation Measure CUL-2, 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: 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 Willow County Water 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-2: 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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

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 Project involves the installation of 2,550 linear feet of watermain consisting of open trench excavation, installation of new watermain segments alongside the old watermain (to be abandoned in place), backfill, and pavement restoration. Construction activities will occur at Laws Avenue, Pomo Lane, and Canyon Drive as previously described.

XIX.a-b) The 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 Project conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As discussed above, the District is proposing the installation of new watermains located under Laws Avenue, Pomo Lane, and Canyon Drive.

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 7:00 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 (CARB). Therefore, it is anticipated that the construction phase of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy.

The operation of the Project would not result in an increase energy usage, as the watermains do not require power. 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:	☐	☐	☒	☐
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.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

DISCUSSION

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. Mendocino County is an active earthquake area with five (5) known faults or fault zones that traverse the County and are considered potentially active or active. Review of the California Department of Conservation (DOC) Fault Activity Map of California depict the project Sites are located approximately 1.5 miles west of the nearest of these fault zones the Maacama Fault which extends from northern Sonoma County to the north of Laytonville in Mendocino County (DOC, 2015). According to the Mendocino County General Plan, Chapter 3 Development Element, surface fault creep, very slow movements across known fault locations, has been documented along the Maacama fault at locations east of Ukiah (Mendocino County, 2020). Review of the DOCs California Geological Survey (CGS) Earthquake Zones of Required Investigation describe the project sites as unevaluated areas (DOCb, 2024).

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 project consists of the installation of three new water mains. The proposed project does not include the development of housing or other above-ground structures that could expose people to loss, injury, or death from the rupture of a fault. The proposed project would not create potential for or exacerbate existing conditions related to seismic ground shaking. Therefore, a less than significant impact would occur.

VII.a.iii) As described in the Mendocino County General Plan Chapter 3 Development Element, there are several alluvial basins in Mendocino County where the subsurface conditions are locally conducive to liquefaction, including the alluvial basins in the Ukiah area (Mendocino County, 2020). The proposed project consists of the installation of three new water mains, to replace three existing mains located underground within the rights of way of Laws Avenue, Canyon Drive, and Pomo Lane. The proposed project would not affect the existing conditions along the installation alignment. Therefore, 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. The area for Canyon Drive is mapped as a class VII to a class X as depicted by the DOC Landslide Inventory (Beta) (DOC, 2015). The project sites are in developed areas where loose soils are not readily present. The proposed project would not create significant new cut slopes that would be susceptible to landslides, and shoring would be used during construction to ensure the disturbed areas do not collapse during construction. Once installed, the new water mains would be buried and repaved. Therefore, a less than significant impact would occur.

VII.b) The project Sites are generally not exposed to substantial slope instability, erosion, or landslide related hazards. The proposed project would be performed using open trench installation. Although the proposed trenching would have the potential to temporarily create erosion and loss of topsoil, the Project is proposed in an area that has been previously disturbed and standard Best Management Practices (BMPs), such as straw bales, fiber roles, and/or silt fences would be employed to limit the potential for erosion resulting from construction. In addition, construction would occur during the dry season [typically May 30 through October 15] when rainfall and runoff potential would be low. Once the water main is installed, disturbed soils would be returned to pre-project conditions. Therefore, 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. The proposed project construction would not exacerbate existing site conditions related to unstable geologic conditions. The proposed improvements would improve potable water infrastructure and will not house people for residence or work. Therefore, a less than significant impact would occur.

VII.d) The Project involves the installation of potable water infrastructure within existing road rights of way. The Project may occur in expansive soils, however, it would not include construction of habitable structures and

is not expected to create substantial risks to life or property because of expansive soil. Therefore, a less than significant impact would occur.

VII.e) The project involves the installation of potable water infrastructure within existing road rights-of-way. Septic tanks or alternative wastewater facilities are not included as part of the proposed project. Therefore, no impact would occur.

VII.f) The project predominantly occurs within existing paved roadways. There are no known unique geological features in the project vicinity. Ground disturbing works is anticipated to be predominantly in previously disturbed ground. Where excavation is not in disturbed ground, it is anticipated to be in surficial soils. The project has a low risk of encountering unique paleontological resources, due to the urban developed nature of the sites. However, there is still a possibility that the project could encounter paleontological resources. Mitigation Measure GEO-1 would ensure that if discovered, paleontological resources would be protected. Implementation of Mitigation Measure GEO-1 would reduce potentially significant impacts to a less than significant level.

MITIGATION MEASURES

GEO-1: 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?	☐	☐	☒	☐
b) 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 2022), 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_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3). The 2020 GHG emissions statewide limit set by AB 32, equal to the 1990 level, is 431 million metric tons of carbon dioxide equivalent ($MMTCO_2e$). 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, 2022).

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_2 equivalent ($MMTCO_2e$), 5 $MMTCO_2e$ lower than 2016 levels and lower than the 2020 statewide GHG limit of 431 $MMTCO_2e$. 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.

As described in Section 3.3, Air Quality, the proposed project would be located within roadway rights of way. The water infrastructure being installed ties into a system that produces indirect GHG emissions from electrical energy used to pump water within the system. The proposed project does not include modifications to the pump system so no changes in indirect GHG emissions are expected as a part of the proposed project.

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 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) 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).

Review of the State Water Resources Control Board (SWRCB) GeoTracker (2024) database identified a total of seven (7) leaking underground storage tanks (LUST) and one (1) cleanup program site within 1,000 feet of the Site. All eight (8) identified locations have been closed and are no longer active. Review of the California Department of Toxic Substances Control (DTSC) on the EnviroStor (2024) database did not identify any sites within 1,000 feet of the Site. The surrounding area contains extensive residential and commercial development along:

- Laws Avenue: located west of the Ukiah Municipal Airport, surrounded on both sides by a mix of two-story apartment complexes, and duplexes. The Ukiah Valley Fire Authority department building is located on the southwest side of the Laws Avenue and S State Street intersection.
- Canyon Drive: located west of the Ukiah Municipal Airport, surrounded on both sides by a mix of one-story residential buildings with one two story residential building.
- Pomo Lane: located south of the Ukiah Municipal Airport, with single family residential development along the east side of Pomo Lane. The west side of Pomo lane is an undeveloped open space.

Laws Avenue and Pomo Lane are located within the Local Responsibility Area (LRA) just within the service boundary of the Ukiah Valley Fire Authority (UVFA) while Canyon Drive is located in the State Responsibility Area (SRA), just outside the service boundaries of the UVFA and is served by the California Department of Forestry and Fire Protection (CalFire). Canyon Drive is mapped as located within a "Very High" fire hazard severity zone, while Laws Avenue and Pomo Lane are not zoned for fire Severity (Fire Hazard Severity Zone Viewer, 2024).

The proposed project location is located within the Ukiah Municipal Airport Land Use Compatibility Plan (UMALUCP) (2021). Review of Exhibit 4-4 *Compatibility Factors: Noise* of the UMALUCP depicts average noise level contours associated with the Average Annual Day[1] and the CalFire Typical Fire-Event Day[2]. (County of Mendocino, 2021). Table 4 below describes the Sites and their relation to the depicted airport noise contours.

Table 4. Average Noise levels based on Airport Noise Contours

Site Location	Avg. Annual Day Noise (CNEL)	Cal Fire Typical Fire-Event Day Noise (CNEL)
Laws Avenue	<55	<55
Canyon Drive	<55	<55
Pomo Lane	<60	<65

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. 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

[1] Average Annual Day represents the typical daily activity based on 2019 activity data provided by Ukiah Municipal Airport Management.
[2] The CalFire noise contours represent typical fire event day with 44 departures and 44 arrivals split evenly between Runways 15 and 33.

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 Sites are located within the Ukiah Unified School District (Mendocino County Maps – School Districts, no date), with the nearest school, Grace Hudson Elementary School, located approximately 830 feet southeast Canyon Drive 870 feet south of Laws Avenue and 2,050 feet northwest of Pomo Lane. 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 (2024) and DTSC's EnviroStor (2024) databases indicates that the Site is not included on a list of active 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) As described above, the Site is located within the UMALUCP (2021) however all Site locations are located within noise contours rated at 65 or less CNEL and are located along residential development. The proposed project would not result in a safety hazard or excessive noise for people residing or working in the proposed project area. No impact would occur.

VIII.f) The proposed project will not change the existing surrounding development and would not change access for public or emergency response vehicles use. No impact would occur.

VIII.g) As discussed above, the purpose of the proposed project is to replace three (3) water mains located within the rights-of-way for Laws Avenue, Canyon Drive, and Pomo Lane. The 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 Sites is the Ukiah Valley District fire station located at the intersection of Laws Avenue and S. State Street which is located approximately 1,000 feet from Canyon Drive, and 3,150 feet from Pomo Lane. 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?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
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?	☐	☐	☒	☐
iv) Impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

DISCUSSION

The National Pollutant Discharge Elimination System (NPDES) permit program of the Environmental Protection Agency (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 State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWCB). Mendocino County is located in District 1 and program oversight is from the North Coast Regional Water Quality Control Board (NCRWQCB).

Construction projects that would disturb more than one acre of land are subject to the requirements of the SWRCB Construction General Permit (CGP), which requires operators of such construction sites to implement stormwater controls and develop a Stormwater Pollution Prevention Plan (SWPPP) identifying specific Best Management Practices (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 the 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 Sites are 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 06045C1514F and 06045C1677F, 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 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).

As discussed previously, the Project consists of the replacement of three sections of water main located at Laws Avenue (1,000 linear feet), Pomo Lane (550 linear feet), and Canyon Drive (1,000 linear feet). The Project would not disturb an area greater than one acre, and the roadway above the water mains would be returned to a similar design and material pre- and post-construction. No additional drainage improvements or modifications are proposed as a part of the proposed project.

X.a) The 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. Additionally, adherence to the post-construction requirements of the CGP would ensure that the Project would comply with applicable water quality standards post-construction. A less than significant impact would occur.

X.b) The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. As noted above, the project is for the replacement of existing watermains located under Laws Avenue, Canyon Drive, and Pomo Lane. The Site would be finished with backfilling and pavement restoration in an "as like" manor. These activities would not increase impervious surface area. The Project would not require the use of groundwater supplies. A less than significant impact would occur.

X.c.i-ii) The Project would not alter the existing drainage pattern of the Sites 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 constructions standards in the CGP. Additionally, stormwater flows would remain the same as designed pre and post construction. A less than significant impact would occur.

X.c.iii) As previously discussed, the Project would be designed and implemented in accordance with the construction and post-construction requirements of the CGP. The Project would not increase the amount of impervious development. 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).

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 06045C1514F and 06045C1677F, effective June 2, 2011. On the basis of the FEMA designation, the risk of flooding occurring at the Site is low. No impact would occur.

X.d) The Site is located in central Mendocino County just outside of 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 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

No mitigation required.

FINDINGS

The proposed project would have a **Less Than Significant Impact** 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

DISCUSSION

The Site is located south and west of the City of Ukiah in Mendocino County. These Site is within roadway rights-of-way identified as Laws Avenue, Canyon Drive, and Pomo Lane, as such, the project construction sites do not have land use or zoning designations, but pursuant to the Mendocino County General Plan (2009) are adjacent to various uses including Commercial (C), Suburban Residential (SR), and Industrial (I).

XI.a) The Project improvements are located underground. The Project does not include any physical barriers such as new roads or fences, such that existing land use patterns would change resulting in a division of an established community. No impact would occur.

XI.b) The Project is the installation of water utility infrastructure. The 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) and the Mendocino County Zoning Code. No new uses are proposed. 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

DISCUSSION

The 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 Site 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 Site 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 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?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

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 2024), the Mendocino County Airport Comprehensive Land Use Plan (ACLUP) (last updated 1996), and the Ukiah Municipal Airport Land Use Compatibility Plan (UMALUCP) (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.

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.

The Project is located within existing streets. The noise environments in these areas are most influenced by the amount of daily vehicles traveling on the surrounding roadways and the Ukiah Municipal Airport located east of Laws Avenue and Canyon Drive, and north of Pomo Lane.

As stated previously in Section IX, *Hazards and Hazardous Materials*, the proposed project location is located within the UMALUCP (2021). Review of Exhibit 4-4 *Compatibility Factors: Noise* of the UMALUCP depicts

average noise level contours associated with the Average Annual Day[3] and the CalFire Typical Fire-Event Day[4]. (County of Mendocino, 2021). Table 5 below describes the Sites and their relation to the depicted airport noise contours.

Table 5. *Average Noise levels based on Airport Noise Contours*

Site Location	Avg. Annual Day Noise (CNEL)	Cal Fire Typical Fire-Event Day Noise (CNEL)
Laws Avenue	<55	<55
Canyon Drive	<55	<55
Pomo Lane	<60	<65

Noise sensitive receptors are areas where unwanted sound or increases in sound may have an adverse effect on people or land uses. Residential areas, hospitals, schools, and parks are examples of noise receptors that could be sensitive to changes in existing environmental noise levels. The nearest noise sensitive receptors in proximity to the project sites include:

- The single-family and multi-family residential areas on Laws Avenue;
- The single-family residential areas on Canyon Drive;
- The single-family residential areas on Pomo Lane;
- Grace Hudson Elementary School, located approximately 0.1 miles south of Laws Avenue and Canyon Drive, and 0.4 miles north of Pomo Lane; and
- Nakomis Park is located approximately 0.45 miles north of Laws Avenue, 0.5 miles north of Canyon Drive, and 1.2 miles north of Pomo Lane.

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. The operation of the proposed project would not increase noise generated due to it replacing the existing infrastructure like for like and its location underground.

XIII.a) The proposed project is the installation of underground water mains which would not generate a permanent increase in ambient noise levels in the vicinity of the Project once installed. As described in Section 2.3, construction of the proposed Project is anticipated to take approximately three (3) months. During this time, construction equipment (e.g., excavator, bobcat, etc.) would be required to dig the trenches and install the new water mains. These activities could temporarily increase noise levels in the project area. Adherence to Mitigation Measure Noise-1 requiring construction activities to be limited to 7:00 am and 7:00 pm, Mondary through Friday within 500 feet of residential uses as well as 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. 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.

[3] Average Annual Day represents the typical daily activity based on 2019 activity data provided by Ukiah Municipal Airport Management.

[4] The CalFire noise contours represent typical fire event day with 44 departures and 44 arrivals split evenly between runways 15 and 33.

XIII.c) As previously discussed, the Site is located within the UMALUCP, according to the plan, noise levels at the Site would not exceed 60 decibels during a normal day, and during a Cal Fire - fire event would not exceed 65 decibels as a result of air traffic. Outside of the temporary increase in noise levels at the Site during construction, it is not anticipated that the project would expose individuals residing or working in or around the project site to excessive noise levels. A less than significant 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)?	☐	☐	☐	☒
b) 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 89,108 persons as of July 1, 2023, a decrease of approximately 2.7 percent, as compared to April 1, 2020. There were an estimated 41,844 housing units as of July 1, 2023, with 2.57 persons per household.

The proposed project entails the replacement of three sections of water main located at Laws Avenue (1,000 linear feet), Pomo Lane (550 linear feet), and Canyon Drive (1,000 linear feet) located south and west of the City of Ukiah in Mendocino County, California.

XIV.a) 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 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 Project would not displace any residents or housing, as the Site occurs in the County rights-of-way and no residential units are located on-site. As previously discussed, the water main replacements will have a temporary construction phase but will be returned to "as like" condition. Existing residential properties located along the sites would continue to have access off Laws Avenue, Canyon Drive, and Pomo Lane. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

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

XV. PUBLIC SERVICES. 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?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

DISCUSSION

The Project seeks to improve water services in the area and local community through the installation and replacement of three water mains located in the right of way of Laws Avenue, Canyon Drive, and Pomo Lane. There are no elements of the proposed project that would impact the ability of the County or other local services provides to provide public services to the Site or local community.

Existing residential properties exist along the Site will continue to have access to Laws Avenue, Canyon Drive, and Pomo Lane. No alteration is proposed to existing driveway approaches, road widths, and turn radii, as such the roadways will continue 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, Laws Avenue and Pomo Lane are located within the Local Responsibility Area (LRA) just within the service boundary of the Ukiah Valley Fire Authority (UVFA) while Canyon Drive is located in the State Responsibility Area (SRA), just outside the service boundaries of the UVFA and is served by the California Department of Forestry and Fire Protection (CalFire). Canyon Drive is mapped as located within a "Very High" fire hazard severity zone, while Laws Avenue and Pomo Lane are not zoned for fire Severity (Fire Hazard Severity Zone Viewer, 2024). The nearest fire station to the Sites is the Ukiah Valley District Fire Station located on the corner of Laws Avenue and State Street at 1500 S State Street, Ukiah, California

As previously described, the Project does not propose changes to the design of existing roadways, construction activities will include the replacement of three water mains which will be backfilled and include pavement restoration where the excavation and backfilling occurred. The Site occurs in areas already developed primarily for residential use, and it is not anticipated that the proposed project would increase service needs at the Site. No 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 2.5 miles north of the Laws Avenue, 2.7 miles north of Canyon Drive and 3.1 miles north of Pomo Lane, at 951 Low Gap Road in Ukiah. As the Site is already served by the Sheriff's Office and the project would not increase service needs at the site. No impact would occur.

XV.c) The Site is located within the Ukiah Unified School District (Mendocino County Maps – School Districts, 2024), with the nearest school, Grace Hudson Elementary School, located approximately 0.1 miles south of Laws Avenue and Canyon Drive, and 0.4 miles north of Pomo Lane. As the 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, two (2) parks and recreational facilities are located within 2 miles of the Site, including Nokomis Park, located approximately 0.45 miles north of Laws Avenue, 0.5 miles north of Canyon Drive, and 1.2 miles north of Pomo Lane and Observatory Park, located approximately 0.8 miles north of Laws Avenue, 0.9 miles north of Canyon Drive, and 1.47 miles north of Pomo Lane. As the 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 No **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?	☐	☐	☐	☒
b) 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:

- Nokomis Park, located approximately 0.45 miles north of Laws Avenue, 0.5 miles north of Canyon Drive, and 1.2 miles north of Pomo Lane;
- Observatory Park, located approximately 0.8 miles north of Laws Avenue, 0.9 miles north of Canyon Drive, and 1.47 miles north of Pomo Lane.

XVI.a-b) As discussed above, existing residential properties located along the sites would continue to have access off Laws Avenue, Canyon Drive, and Pomo Lane. No residential units would be constructed, nor is the population expected to increase, as a result of the Project. As a result, the use of existing park and recreational facilities would not be expected to increase as a result of the 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?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) 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. Vehicle Miles Traveled (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 proposed project is located within the rights-of-way of Laws Avenue, Canyon Drive, and Pomo Lane. The Project will not alter the dimensions, capacity, or conditions under which these roadways are designed or utilized. Existing residential properties located along these three roadways will continue to have access outside of construction hours typically from 7:00am to 7:00pm. As such, VMT are not expected to increase.

XVII.a) The 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 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, however, once construction is complete, the construction workers and equipment would no longer be required at the Site. After completion of construction, the Project is not expected to increase traffic, as it will not alter the dimensions, capacity, or conditions under which these roadways are designed or utilized. The Project will not create or remove any bicycle or pedestrian

facilities, and would not be anticipated 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 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 Project would not attract additional use to the residential area residing along the three roadway right of ways, the Project is not expected to increase VMT after completion of construction. In addition, as of the date of this Initial Study, the County has 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 Project is not anticipated to substantially increase hazards due to geometric design features or incompatible uses. As discussed above, the Project Site 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 Project will not result in inadequate emergency access, as the Project has been designed to maintain road standards as currently designed. 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:	☐	☐	☐	☐
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)?	☐	☒	☐	☐
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.	☐	☒	☐	☐

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 16th 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 19th 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.

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 March 8, 2024. 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 January 30, 2023, 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. The NAHC responded on February 7, 2024, indicating that a search of the SLF returned a positive result and the NAHC suggested contacting the Pinoleville Pomo Nation for further

information. On January 30, 2024, a letter was sent to the Tribal Historic Preservation Officer (THPO) or appropriate representative of each tribal group associated with the Site. Additionally, the Pinoleville Pomo Nation was contacted by phone on February 12, 2024, by ALTA. On July 23, 2024, LACO reached out to the Pinoleville Pomo Nation on behalf of the District via email requesting additional information as suggested by the NAHC. No responses have been received by ALTA or LACO to date.

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 February 6, 2024 (File Number 22-1565). 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 quarter mile of the project area. Thirteen prior cultural resources studies have been performed within a quarter mile radius of the Site, although no studies have previously occurred within the project area. One historic-era cultural resource and two ancestral Native American cultural resources have been documented within a quarter-mile radius of the Site (Alta, 2024). No cultural resources were identified within the Project Area as a result of the records search or literature review.

a.i-ii) As discussed in Section V (Cultural Resources), above, one historic-era cultural resource, a railroad, known as the Northwest Pacific Railroad, and two ancestral Native American cultural resources were identified within a quarter mile of the Site during the records search. The project is not expected to have an adverse effect on the railroad or Native American cultural resources 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. With inclusion of CUL-1 [as set forth under Section V (Cultural Resources), above], the potential for significant impacts to unknown TCRs will be minimized to a level that is **less than significant with mitigation incorporated**.

MITIGATION MEASURES

See Mitigation Measure **CUL-1** in Section V, Cultural Resources.

FINDINGS

With the inclusion of Mitigation Measure CUL-1, the proposed project would have a **Less Than Significant Impact with Mitigation Incorporated** 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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

DISCUSSION

As discussed previously, the Project consists of the replacement of three sections of water mains located at Laws Avenue (1,000 linear feet), Pomo Lane (550 linear feet), and Canyon Drive (1,000 linear feet). The Project would not disturb an area greater than one acre, and the roadway above the water mains would be returned to a similar design and material pre- and post-construction. No additional drainage improvements or modifications are proposed as a part of the proposed project. 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.

XVIX.a) The proposed construction and replacement of existing water main would not result in significant environmental effects and would not expand or create new water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities. As illustrated in the impact discussions contained in this Initial Study (see Sections VI Energy, X Hydrology and Water Quality, and XV Public Services). Therefore, the project would have a less than significant impact on utilities and service systems.

XVIX.b) As discussed above, the Project involves the construction and replacement of existing water mains, and therefore, is not anticipated to need water. No impact would occur.

XVIX.c) As discussed above, the Project involves the construction and replacement of existing water main, 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 Project and any 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.

XX. WILDFIRE. 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐

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, 2022).

Laws Avenue and Pomo Lane are located within the Local Responsibility Area (LRA) just within the service boundary of the Ukiah Valley Fire Authority (UVFA) while Canyon Drive is located in the State Responsibility Area (SRA), just outside the service boundaries of the UVFA and is served by the California Department of Forestry and Fire Protection (CalFire). Canyon Drive is mapped as located within a "Very High" fire hazard severity zone, while Laws Avenue and Pomo Lane are not zoned for fire Severity (Fire Hazard Severity Zone Viewer, 2024).

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. 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, occurring in county street rights-of-way. A less than significant impact would occur.

XX.c) The Site is currently developed County Road rights-of-way, and the proposed project entails the trenching, replacement of existing water main, then back filling and patching the road surface. 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 the rights-of-way of County roads. The proposed project will not alter the roadway drainage and BMPs will be utilized during the construction phase of the project to ensure stormwater runoff 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?	☐	☐	☒	☐
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).	☐	☐	☒	☐
c) Does the project 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 replacement of three water mains 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 Site was not found to contain any special status plant species. A less than significant impact would occur.

XXI.b) No cumulative impacts have been identified as a result of the proposed project. The project is intended to serve an existing use to provide the Willow County Water District with improved infrastructure to increase water conservation. 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 impact of construction noise on nearby sensitive receptors are mitigated by Mitigation Measure NOISE-1. With mitigation, a less than significant impact would occur.

MITIGATION MEASURES

Refer to Mitigation Measures CUL-1 and CUL-2 in Section V (Cultural Resources), GEO-1 in Section VII (Geology and Soils), 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.

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FIGURES

APPENDIX A

Mitigation and Monitoring Program (MMRP)

MITIGATION MONITORING AND REPORTING PROGRAM

Public Resources Code, Section 21081.6 (Assembly Bill 3180) requires that mitigation measures identified in environmental review documents prepared in accordance with California Environmental Quality Act (CEQA) are implemented after a project is approved. Therefore, this Mitigation Monitoring and Reporting Program (MMRP) has been prepared to ensure compliance with the adopted mitigation measures during the implementation of the Water Line Replacement Project. The Willow County Water District is the agency responsible for implementation of the mitigation measures identified in the Initial Study.

This MMRP provides the Willow County Water District with a convenient mechanism for quickly reviewing all the mitigation measures including the ability to focus on select information such as timing. The MMRP includes the following information for each mitigation measure:

- The phase of the project during which the required mitigation measure must be implemented;
- The phase of the project during which the required mitigation measure must be monitored;
- The enforcement agency; and
- The level of significance after mitigation.

The MMRP includes a checklist to be used during the mitigation monitoring period. The checklist will verify the name of the monitor and the date of the monitoring activity.

Mitigation Monitoring and Reporting Program						
Mitigation Measure	**Implementation Phase**	**Monitoring Phase**	**Enforcement Agency**	**Level of Significance After Mitigation**	**Verification of Compliance**	
					Initial	**Date**
Cultural Resources						
CUL-1: 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.	Project Construction	Project Construction	Willow County Water District	Less Than Significant		
CUL-2: 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.	Project Construction	Project Construction	Willow County Water District	Less Than Significant		
Geology and Soils						
GEO-1: In the event that fossils or fossil-bearing deposits are discovered during project construction, the contractor shall notify a qualified	Project Construction	Project Construction	Willow County Water District	Less Than Significant		

Mitigation Monitoring and Reporting Program						
Mitigation Measure	**Implementation Phase**	**Monitoring Phase**	**Enforcement Agency**	**Level of Significance After Mitigation**	**Verification of Compliance**	
					Initial	**Date**
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.						
Noise						
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.	Project Construction	Project Construction	Willow County Water District	Less Than Significant		
Tribal Cultural Resources						
See Mitigation Measures CUL-1 through CUL-2 under Cultural Resources, above.	Project Construction	Project Construction	Willow County Water District	Less Than Significant		

APPENDIX B

Biological Resources Survey (BRS)

AREA WEST ENVIRONMENTAL, INC.
EST 2000

April 12, 2024

Paul Peck
LACO Associates
Via email: peckp@lacoassociates.com

SUBJECT: Biological Resources Survey Results at the Willow County Water District Water Main Replacement Project (AWE #24-002).

Dear Mr. Peck:

This report presents the methods and results of a biological resources survey conducted at the Willow County Water District Water Main Replacement Project (Project) site in Ukiah, Mendocino County, California.

Study Area Description

The Project site is located in Ukiah, Mendocino County, California, in three locations. The Laws Avenue water main extends from the eastern end of Laws Avenue to its junction with South Dora Street, west of the Ukiah Municipal Airport. The Pomo Lane water main extends along the entirety of Pomo Lane between Bethal Lane and Townsend Lane. The Canyon Lane water main begins approximately 150 feet west of its junction with Rosemary Lane, extending west along Canyon Lane into adjacent private properties. The 2,650-linear-foot Project site is located on the Ukiah and Elledge Peak U.S. Geological Survey 7.5-minute quadrangle topographic maps in Section 00 of Township 15 North, Range 12 West. Elevations range from 590 feet to 660 feet above mean sea level at the Project site. The approximate center coordinates of the Project site are longitude -123.203880 and latitude 39.123075, North American Datum 1983 (NAD83).

The Project site is surrounded by residential development with deciduous woodlands present at the western end of Canyon Lane and undeveloped annual grassland west of Pomo Lane.

Methods

Background Data

Prior to the survey, AWE conducted database searches including the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Consultation, California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB), and the California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants. The database searches were used to determine which rare plant and animal species have been documented in the vicinity of the Project site. Species lists acquired from each source are in Attachment 1 – CNDDB, USFWS, and CNPS Species Lists.

Field Survey

Area West Environmental, Inc. (AWE) biologists, Mikhela Aiken and Evan Putnam, conducted a one-day biological survey along the Project site. The survey was conducted by trained biologists familiar with California flora and fauna, including special-status species. The surveys were conducted by walking the survey area and inspecting the surrounding area for nesting birds and special-status species. The entire Project site was accessible and covered during the surveys, including the private properties present at the western end of the Canyon Lane water main. Areas that contained potentially suitable special-status species habitat and potentially jurisdictional aquatic resources within the parcels were also closely examined. All plants were identified to the lowest taxonomic level necessary to determine whether they are rare. Observed species were recorded and compiled into Attachment 2 – Observed Plant and Animal Species.

Results

Background Data Results

Based on review of the database searches and occurrence records, it was determined that 30 special-status plant species and 18 special-status wildlife species have been documented or have the possibility to occur within the vicinity of the Project site. Most of these were determined unlikely to occur within the Project site due to a lack of suitable habitat present. AWE surveyed the Project site for all 48 species identified in background data research.

Field Survey Results

Habitat onsite was evaluated during the surveys for its potential to support rare native species. Habitat types identified include Developed and Valley Oak Woodland. The main habitat onsite was characterized as Developed, dominated by ornamental landscaping plants and other introduced species, such as common groundsel (*Senecio vulgaris*) and white-stem filaree (*Erodium moschatum*). Within the private property present at the western end of the Canyon Lane portion of the Project site, a Valley Oak (*Quercus lobata*) Woodland, with ground iris (*Iris macriosiphon*) and Adelinia (*Adelinia grandis*), was present with full shade where occurring. Sparse canopy cover was present throughout the remaining portions of the Project site. Much of the site has been highly modified or disturbed by anthropogenic influence.

No wetlands or other potentially jurisdictional aquatic resources were identified within the Project site. However, there is an intermittent stream that runs along the back of private homes north of Canyon Drive. Water was present in this intermittent waterway, which was dominated by curly dock (*Rumex crispus*) and summer snowflake (*Leucojum aestivum*) with an overstory of dense woody vegetation. This stream has a hydrologic connection to the Russian River and is expected to qualify as an other waters of the U.S.

The botanical survey overlapped with the identification period for 20 of the 30 special-status plant species with potential to occur in the Project site. No special-status plant species were observed within the Project site during the April 2024 survey, eliminating the 20 special-status plant species whose identification (blooming) period overlapped with the survey. Of the 10 remaining special-status plant species, nine species were considered absent because the Project

site lacks suitable habitat for these species. Because of the high degree of anthropogenic disturbance at this site, the habitat present is considered to have overall low potential to support rare native plants. One species, Glandular dwarf flax (*Hesperolinon adeniphyllum*) is a serpentine specialist, and serpentine soil does not occur within or adjacent to the Project site within five miles. The Project site lacked suitable habitat for the following eight species, which are therefore considered absent from the Project site: San Francisco onion (*Allium peninsulare* var. *franciscanum*), Bristly sedge (*Carex comosa*), Mendocino bushmallow (*Malacothamnus mendocinensis*), White flowered rein orchid (*Piperia candida*), Bolander's silene (*Silene bolanderi*), Common viburnum (*Viburnum ellipticum*), Watershield (*Brasenia schreberi*), and Bolander's horkelia (*Horkelia bolanderi*). One remaining species, Beaked tracyina (*Tracyina rostrata*), a CNPS rank 1B.2 plant, has a low potential to occur within the Project site due to presence of marginally suitable, highly disturbed, habitat along the western edge of Pomo Lane. Vegetative growth for Beaked tracyina was not observed during the survey, but presence/absence could not be confirmed at this time since the survey was outside the identification period for Beaked tracyina (June).

Suitable habitat was not present for 14 species of the 18 special-status wildlife species with potential to occur in the Project area, and of the four remaining special-status wildlife species, three have the potential to occur in the Project site. Four special-status wildlife species have the potential to occur within the Project site: Osprey (*Pandion haliaetus*), a CDFW watch-list species; Townsend's big-eared bat (*Corynorhinus townsendii*), a CDFW species of special concern; Pallid bat (*Antrozous pallidus*), a CDFW species of special concern; and Western bumble bee (*Bombus occidentalis*), a candidate for federal listing as endangered.

No special-status wildlife was observed within the Project site during the April 2024 survey.

Representative photographs of the Project site are in Attachment 3 – Representative Photos.

Conclusion

There are no wetlands or jurisdictional waters located within the Project site. An unnamed intermittent stream, located north of Canyon Drive, is expected to qualify as an other waters of the U.S. and would therefore be subject to jurisdiction by the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife. However, the Project would not affect this jurisdictional water. It is recommended that the waterway north of Canyon Drive is designated as an Environmentally Sensitive Area on project plans to instruct the contractor to avoid this feature.

No special-status species were encountered during the surveys conducted on April 1, 2024. No federally or state-listed species would potentially be affected by the Project. Of the 48 special-status species identified as potentially occurring within the Project site, 43 special-status species are considered to be absent from the Project site. To confirm that the remaining four wildlife species (Osprey, Townsend's big-eared bat, Pallid bat, and Western bumble bee) and one plant species are not present at the Project site at the time of construction, a pre-construction survey is recommended. The botanical survey in June should be conducted to rule out the presence of Beaked tracyina from the Project site. Should Beaked tracyina be present, topsoil from the area surrounding the plant(s) should be collected prior to construction and replaced following

construction. If nesting osprey or roosting bats are discovered during pre-construction surveys, a no-disturbance buffer should be established in consultation with a biologist.

With implementation of the recommended measures for an additional botanical survey and pre-construction survey, and avoidance of impacts to the stream along Canyon Drive, no environmental permits would be required for the Project.

Please call me at 916-987-3362 or email me at adour-smith@areawest.net with any questions.

Sincerely,

Aimee Dour-Smith

Aimee Dour-Smith
Senior Planner

Attachment 1 – CNDDB, USFWS, and CNPS Species Lists
Attachment 2 – Plant and Animal Species Observed
Attachment 3 – Representative Photos

Attachment 1

CNDDB, USFWS, and CNPS Plant Lists

Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad IS (Potter Valley (3912331) OR Cow Mountain (3912321) OR Purdys Gardens (3912311) OR Orrs Springs (3912323) OR Ukiah (3912322) OR Redwood Valley (3912332) OR Laughlin Range (3912333) OR Boonville (3912313) OR Elledge Peak (3912312))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Accipiter atricapillus American goshawk	ABNKC12061	None	None	G5	S3	SSC
Agelaius tricolor tricolored blackbird	ABPBXB0020	None	Threatened	G1G2	S2	SSC
Ammodramus savannarum grasshopper sparrow	ABPBXA0020	None	None	G5	S3	SSC
Antrozous pallidus pallid bat	AMACC10010	None	None	G4	S3	SSC
Arborimus pomo Sonoma tree vole	AMAFF23030	None	None	G3	S3	SSC
Arctostaphylos stanfordiana ssp. raichei Raiche's manzanita	PDERI041G2	None	None	G3T2	S2	1B.1
Blennosperma bakeri Sonoma sunshine	PDAST1A010	Endangered	Endangered	G1	S1	1B.1
Bombus caliginosus obscure bumble bee	IIHYM24380	None	None	G2G3	S1S2	
Bombus occidentalis western bumble bee	IIHYM24252	None	Candidate Endangered	G3	S1	
Brasenia schreberi watershield	PDCAB01010	None	None	G5	S3	2B.3
Carex comosa bristly sedge	PMCYP032Y0	None	None	G5	S2	2B.1
Ceanothus confusus Rincon Ridge ceanothus	PDRHA04220	None	None	G1	S1	1B.1
Corynorhinus townsendii Townsend's big-eared bat	AMACC08010	None	None	G4	S2	SSC
Emys marmorata western pond turtle	ARAAD02030	Proposed Threatened	None	G3G4	S3	SSC
Entosthodon kochii Koch's cord moss	NBMUS2P050	None	None	G1	S1	1B.3
Erethizon dorsatum North American porcupine	AMAFJ01010	None	None	G5	S3	
Fritillaria roderickii Roderick's fritillary	PMLIL0V0M0	None	Endangered	G1Q	S1	1B.1
Gonidea angulata western ridged mussel	IMBIV19010	None	None	G3	S2	

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Gratiola heterosepala Boggs Lake hedge-hyssop	PDSCR0R060	None	Endangered	G2	S2	1B.2
Grimmia torenii Toren's grimmia	NBMUS32330	None	None	G2	S2	1B.3
Hesperolinon adenophyllum glandular western flax	PDLIN01010	None	None	G2G3	S2S3	1B.2
Horkelia bolanderi Bolander's horkelia	PDROS0W011	None	None	G1	S1	1B.2
Hysterocarpus traskii lagunae Clear Lake tule perch	AFCQK02013	None	None	G5T3	S3	SSC
Kopsiopsis hookeri small groundcone	PDORO01010	None	None	G4?	S1S2	2B.3
Lasthenia burkei Burke's goldfields	PDAST5L010	Endangered	Endangered	G1	S1	1B.1
Layia septentrionalis Colusa layia	PDAST5N0F0	None	None	G2	S2	1B.2
Limnanthes bakeri Baker's meadowfoam	PDLIM02020	None	Rare	G1	S1	1B.1
Malacothamnus mendocinensis Mendocino bush-mallow	PDMAL0Q0D0	None	None	G1Q	S1	1B.1
Navarretia leucocephala ssp. bakeri Baker's navarretia	PDPLM0C0E1	None	None	G4T2	S2	1B.1
Northern Interior Cypress Forest Northern Interior Cypress Forest	CTT83220CA	None	None	G2	S2.2	
Oncorhynchus mykiss irideus pop. 48 steelhead - northern California DPS summer-run	AFCHA0213P	Threatened	Endangered	G5T2Q	S2	
Oncorhynchus mykiss irideus pop. 49 steelhead - northern California DPS winter-run	AFCHA0213Q	Threatened	None	G5T3Q	S3	
Pandion haliaetus osprey	ABNKC01010	None	None	G5	S4	WL
Pekania pennanti Fisher	AMAJF01020	None	None	G5	S2S3	SSC
Piperia candida white-flowered rein orchid	PMORC1X050	None	None	G3?	S3	1B.2
Plagiobothrys lithocaryus Mayacamas popcornflower	PDBOR0V0P0	None	None	GX	SX	1A
Pleuropogon hooverianus North Coast semaphore grass	PMPOA4Y070	None	Threatened	G2	S2	1B.1
Rana boylii pop. 1 foothill yellow-legged frog - north coast DPS	AAABH01051	None	None	G3T4	S4	SSC
Serpentine Bunchgrass Serpentine Bunchgrass	CTT42130CA	None	None	G2	S2.2	

Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Silene bolanderi Bolander's catchfly	PDCAR0U2L0	None	None	G2	S2	1B.2
Streptanthus glandulosus ssp. hoffmanii Hoffman's bristly jewelflower	PDBRA2G0J4	None	None	G4T2	S2	1B.3
Taricha rivularis red-bellied newt	AAAAF02020	None	None	G2	S2	SSC
Tracyina rostrata beaked tracyina	PDAST9D010	None	None	G2	S2	1B.2
Trifolium buckwestiorum Santa Cruz clover	PDFAB402W0	None	None	G2	S2	1B.1
Usnea longissima Methuselah's beard lichen	NLLEC5P420	None	None	G4	S4	4.2
Viburnum ellipticum oval-leaved viburnum	PDCPR07080	None	None	G4G5	S3?	2B.3

Record Count: 46

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Arcata Fish And Wildlife Office
1655 Heindon Road
Arcata, CA 95521-4573
Phone: (707) 822-7201 Fax: (707) 822-8411

In Reply Refer To:
Project Code: 2024-0052628
Project Name: 24-002 Willow CWD Water Main

February 22, 2024

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed, and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through IPaC by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at: https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see Migratory Bird Permit | What We Do | U.S. Fish & Wildlife Service (fws.gov).

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arcata Fish And Wildlife Office
1655 Heindon Road
Arcata, CA 95521-4573
(707) 822-7201

PROJECT SUMMARY

Project Code: 2024-0052628
Project Name: 24-002 Willow CWD Water Main
Project Type: Water Supply Pipeline - Maintenance/Modification - Below Ground
Project Description: Water main replacement project in Ukiah, California
Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@39.1260748,-123.20645655000013,14z

Counties: Mendocino County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 8 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
Northern Spotted Owl *Strix occidentalis caurina* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1123	Threatened
Western Snowy Plover *Charadrius nivosus nivosus* Population: Pacific Coast population DPS-U.S.A. (CA, OR, WA), Mexico (within 50 miles of Pacific coast) There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8035	Threatened
Yellow-billed Cuckoo *Coccyzus americanus* Population: Western U.S. DPS There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

REPTILES

NAME	STATUS
Northwestern Pond Turtle *Actinemys marmorata* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

FLOWERING PLANTS

NAME	STATUS
Burke's Goldfields *Lasthenia burkei* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4338	Endangered
Contra Costa Goldfields *Lasthenia conjugens* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7058	Endangered
Showy Indian Clover *Trifolium amoenum* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6459	Endangered

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Area West Environmental, Inc.
Name: Mikhela Aiken
Address: 6248 Main Avenue, Suite #C
City: Orangevale
State: CA
Zip: 95662
Email maiken@areawest.net
Phone: 9169873362

CALIFORNIA NATIVE PLANT SOCIETY

CNPS Rare Plant Inventory

Search Results

27 matches found. Click on scientific name for details

Search Criteria: CRPR is one of [**1A:1B:2A:2B**] , 9-Quad include [**3912331:3912321:3912311:3912323:3912322:3912332:3912333:3912313:3912312**]

▲ SCIENTIFIC NAME	COMMON NAME	FAMILY	LIFEFORM	BLOOMING PERIOD	FED LIST	STATE LIST	CA RARE PLANT RANK
Allium peninsulare var. *franciscanum*	Franciscan onion	Alliaceae	perennial bulbiferous herb	(Apr)May-Jun	None	None	1B.2
Arctostaphylos stanfordiana ssp. *raichei*	Raiche's manzanita	Ericaceae	perennial evergreen shrub	Feb-Apr	None	None	1B.1
Blennosperma bakeri	Sonoma sunshine	Asteraceae	annual herb	Mar-May	FE	CE	1B.1
Brasenia schreberi	watershield	Cabombaceae	perennial rhizomatous herb (aquatic)	Jun-Sep	None	None	2B.3
Carex comosa	bristly sedge	Cyperaceae	perennial rhizomatous herb	May-Sep	None	None	2B.1
Ceanothus confusus	Rincon Ridge ceanothus	Rhamnaceae	perennial evergreen shrub	Feb-Jun	None	None	1B.1
Entosthodon kochii	Koch's cord moss	Funariaceae	moss		None	None	1B.3
Fritillaria roderickii	Roderick's fritillary	Liliaceae	perennial bulbiferous herb	Mar-May	None	CE	1B.1
Gratiola heterosepala	Boggs Lake hedge-hyssop	Plantaginaceae	annual herb	Apr-Aug	None	CE	1B.2
Grimmia torenii	Toren's grimmia	Grimmiaceae	moss		None	None	1B.3
Hesperolinon adenophyllum	glandular western flax	Linaceae	annual herb	May-Aug	None	None	1B.2
Horkelia bolanderi	Bolander's horkelia	Rosaceae	perennial herb	(May)Jun-Aug	None	None	1B.2
Kopsiopsis hookeri	small groundcone	Orobanchaceae	perennial rhizomatous herb (parasitic)	Apr-Aug	None	None	2B.3
Lasthenia burkei	Burke's goldfields	Asteraceae	annual herb	Apr-Jun	FE	CE	1B.1
Layia septentrionalis	Colusa layia	Asteraceae	annual herb	Apr-May	None	None	1B.2
Limnanthes bakeri	Baker's meadowfoam	Limnanthaceae	annual herb	Apr-May	None	CR	1B.1
Malacothamnus mendocinensis	Mendocino bush-mallow	Malvaceae	perennial deciduous shrub	Jun-Aug	None	None	1B.1
Navarretia leucocephala ssp. *bakeri*	Baker's navarretia	Polemoniaceae	annual herb	Apr-Jul	None	None	1B.1
Piperia candida	white-flowered rein orchid	Orchidaceae	perennial herb	(Mar-Apr)May-Sep	None	None	1B.2
Plagiobothrys lithocaryus	Mayacamas popcornflower	Boraginaceae	annual herb	Apr-May	None	None	1A

Pleuropogon hooverianus	North Coast semaphore grass	Poaceae	perennial rhizomatous herb	Apr-Jun	None	CT	1B.1
Ramalina thrausta	angel's hair lichen	Ramalinaceae	fruticose lichen (epiphytic)		None	None	2B.1
Silene bolanderi	Bolander's catchfly	Caryophyllaceae	perennial herb	May-Jun	None	None	1B.2
Streptanthus glandulosus ssp. *hoffmanii*	Hoffman's bristly jewelflower	Brassicaceae	annual herb	Mar-Jul	None	None	1B.3
Tracyina rostrata	beaked tracyina	Asteraceae	annual herb	May-Jun	None	None	1B.2
Trifolium buckwestiorum	Santa Cruz clover	Fabaceae	annual herb	Apr-Oct	None	None	1B.1
Viburnum ellipticum	oval-leaved viburnum	Viburnaceae	perennial deciduous shrub	May-Jun	None	None	2B.3

Showing 1 to 27 of 27 entries

Suggested Citation:

California Native Plant Society, Rare Plant Program. 2024. Rare Plant Inventory (online edition, v9.5). Website https://www.rareplants.cnps.org [accessed 23 February 2024].

Attachment 2

Plant and Wildlife Species Observed

Species Observed at the Willow County Water District Water Main Replacement, Pomo Lane Project Site on 04/01/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Plants				
Allium triquetrum	Three-cornered garlic	Alliaceae	Naturalized	--
Arum italicum	Italian lords and ladies	Araceae	Naturalized	--
Avena barbata	Slender wild oat	Poaceae	Invasive	--
Brassica rapa	Field mustard	Brassicaceae	Invasive	FACU
Bromus commutatus	Meadow brome	Poaceae	Naturalized	--
Bromus diandrus	Ripgut brome	Poaceae	Invasive	--
Cardamine hirsuta	Hairy bitter cress	Brassicaceae	Naturalized	FACU
Carduus pycnocephalus	Italian thistle	Asteraceae	Invasive	--
Catalpa speciosa	Northern catalpa	Bignoniaceae	Naturalized	FACU
Eriobotrya japonica	Loquat	Rosaceae	Naturalized	--
Erodium moschatum	Whitestem filaree	Geraniaceae	Naturalized	--
Eschscholzia californica	California poppy	Papaveraceae	Native	UPL
Festuca arundinacea	Reed fescue	Poaceae	Invasive	--
Festuca myuros	Rattail sixweek grass	Poaceae	Invasive	--
Galium aparine	Goose grass	Rubiaceae	Native	FACU
Hordeum murinum	Wall barley	Poaceae	Invasive	FAC
Lonicera japonica	Japanese honeysuckle	Caprifoliaceae	Invasive	FAC
Magnolia sp.	Magnolia	Magnoliaceae	Introduced	--
Malva nicaeensis	Bull mallow	Malvaceae	Naturalized	--
Medicago polymorpha	California burclover	Fabaceae	Invasive	FACU
Plantago lanceolata	English plantain	Plantaginaceae	Invasive	FACU
Poa annua	Annual blue grass	Poaceae	Naturalized	FAC
Prunus cerasifera	Plum cherry	Rosaceae	Naturalized	--
Prunus sp.	Prunus	Rosaceae	Naturalized	--

Species Observed at the Willow County Water District Water Main Replacement, Pomo Lane Project Site on 04/01/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Quercus lobata	Valley Oak	Fagaceae	Native	FACU
Raphanus sativus	Jointed charlock	Brassicaceae	Invasive	--
Rosemarinus officinalis	Rosemary	Lamiaceae	Naturalized	--
Rumex crispus	Curly dock	Polygonaceae	Invasive	FAC
Senecio vulgaris	Common groundsel	Asteraceae	Naturalized	FACU
Taraxacum officinale	Common dandelion	Asteraceae	Naturalized	FACU
Trifolium repens	White clover	Fabaceae	Naturalized	FAC
Vicia villosa	Hairy vetch	Fabaceae	Naturalized	--
Vitis californica	California grape	Vitaceae	Native	FACU
Wildlife				
Baeolophus inornatus	Oak Titmouse	Paridae	--	--
Corvus brachyrhynchos	American Crow	Corvidae	--	--
Haemorhous mexicanus	House Finch	Fringillidae	--	--
Mimus polyglottus	Northern Mockingbird	Mimidae	--	--
Myiarchus cinerascens	Ash-throated Flycatcher	Tyrannidae	--	--
Passer domesticus	House Sparrow	Passeridae	--	--
Regulus calendula	Ruby-crowned Kinglet	Regulidae	--	--
Spinus psaltria	Lesser Goldfinch	Fringillidae	--	--
Streptopelia decaocto	Eurasian Collared-Dove	Columbidae	--	--
Turdus migratorius	American Robin	Turdidae	--	--

Species Observed at the Willow County Water District Water Main Replacement, Laws Avenue Project Site on 04/01/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Plants				
Avena barbata	Slender wild oat	Poaceae	Invasive	--
Bromus diandrus	Ripgut brome	Poaceae	Invasive	--
Cardamine hirsuta	Hairy bitter cress	Brassicaceae	Naturalized	FACU
Erodium moschatum	Whitestem filaree	Geraniaceae	Naturalized	--
Eschscholzia californica	California poppy	Papaveraceae	Native	UPL
Euryops pectinatus	Grey-leaved euryops	Asteraceae	Naturalized	--
Festuca arundinacea	Reed fescue	Poaceae	Invasive	--
Festuca myuros	Rattail sixweek grass	Poaceae	Invasive	--
Galium aparine	Goose grass	Rubiaceae	Native	FACU
Geranium dissectum	Cut-leaved crane's-bill	Geraniaceae	Invasive	--
Hordeum murinum	Wall barley	Poaceae	Invasive	FAC
Juniperus sp.	Ornamental juniper	Cupressaceae	Naturalized	--
Lactuca serriola	Prickly lettuce	Asteraceae	Naturalized	FACU
Liriodendron tulipifera	Tuliptree	Magnoliaceae	Naturalized	--
Malva incaeensis	Bull mallow	Malvaceae	Naturalized	--
Medicago polymorpha	California burclover	Fabaceae	Invasive	FACU
Olea europaea	Olive	Oleaceae	Invasive	--
Poa annua	Annual blue grass	Poaceae	Naturalized	FAC
Poa bulbosa	Bulbous blue grass	Poaceae	Naturalized	FACU
Prunus sp.	Prunus	Rosaceae	Introduced	--
Quercus lobata	Valley oak	Fagaceae	Native	FACU
Rhaphiolepis indica	Indian hawthorn	Rosaceae	Naturalized	--
Rosemarinus officinalis	Rosemary	Lamiaceae	Naturalized	--
Senecio vulgaris	Common groundsel	Asteraceae	Naturalized	FACU
Sequoia sempervirens	Coast redwood	Cupressaceae	Native	--

Species Observed at the Willow County Water District Water Main Replacement, Laws Avenue Project Site on 04/01/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Soliva sessilis	South American soliva	Asteraceae	Naturalized	FAC
Sonchus oleraceus	Common sow-thistle	Asteraceae	Naturalized	UPL
Taraxacum officinale	Common dandelion	Asteraceae	Naturalized	FACU
Toxicodendron diversilobum	Poison oak	Anacardiaceae	Native	FAC
Trifolium repens	White clover	Fabaceae	Naturalized	FAC
Veronica persica	Bird's-eye speedwell	Plantaginaceae	Naturalized	--
Wildlife				
Baeolophus inornatus	Oak Titmouse		--	--
Haemorhous mexicanus	House Finch		--	--

Species Observed at the Willow County Water District Water Main Replacement, Canyon Drive Project Site on 04/01/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Plants				
Achillea millefolium	Yarrow	Asteraceae	Native	FACU
Adelinia grandis	Adelinia	Boraginaceae	Native	--
Allium neapolitanum	White garlic	Alliaceae	Naturalized	--
Allium triquetum	Three-cornered garlic	Alliaceae	Naturalized	--
Arbutus menziesii	Pacific madrone	Ericaceae	Native	UPL
Arum italicum	Italian lords and ladies	Araceae	--	
Berberis aquifolium	Oregon grape	Berberidaceae	Native	--
Brassica rapa	Field mustard	Brassicaceae	Invasive	FACU
Bromus diandrus	Ripgut brome	Poaceae	Invasive	--
Cardamine hirsuta	Hairy bitter cress	Brassicaceae	Naturalized	FACU

Species Observed at the Willow County Water District Water Main Replacement, Canyon Drive Project Site on 04/01/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Carduus pycnocephalus	Italian thistle	Asteraceae	Invasive	--
Chlorogalum pomeridianum var. *pomeridianum*	Waveyleaf soap plant	Agavaceae	Native	--
Claytonia perfoliata	Miner's lettuce	Portulacaceae	Native	FAC
Cynosurus echinatus	Bristly dogtail grass	Poaceae	Invasive	--
Elymus sp.	Elymus	Poaceae	Naturalized	--
Erodium moschatum	Whitestem filaree	Geraniaceae	Naturalized	--
Euphorbia peplus	Petty spurge	Euphorbiaceae	Naturalized	--
Festuca myuros	Rattail sixweek grass	Poaceae	Invasive	--
Galium aparinum	Goose grass	Rubiaceae	Native	FACU
Geranium dissectum	Cut-leaved crane's-bill	Geraniaceae	Invasive	--
Hordeum murinum	Wall barley	Poaceae	Invasive	FAC
Iris macrosiphon	Ground iris	Iridaceae	Native	--
Iris pseudacorus	Yellow iris	Iridaceae	Invasive	OBL
Lamium purpureum	Purple dead nettle	Lamiaceae	Naturalized	--
Lathyrus vestitus	Common pacific pea	Fabaceae	Native	--
Leucojum aestivum	Summer snowflake	Amaryllidaceae	Naturalized	--
Liriodendron tulipifera	Tuliptree	Magnoliaceae	Naturalized	--
Lomatium californicum	California lomatium	Apiaceae	Native	--
Lonicera hispidula	Pink honeysuckle	Caprifoliaceae	Native	FACU
Luzula comosa	Pacific wood-rush	Juncaceae	Native	FAC
Malva nicaeensis	Bull mallow	Malvaceae	Naturalized	--
Medicago polymorpha	California burclover	Fabaceae	Invasive	FACU
Oxalis articulata ssp. rubra	Windowbox woodsorrel	Oxalidaceae	Naturalized	--
Pentagramma triangularis	Goldenback fern	Pteridiaceae	Native	--
Phoradendron leucarpus subsp. macrophyllum	Big leaf mistletoe	Viscaceae	Native	--
Plantago lanceolata	English plantain	Plantaginaceae	Invasive	FACU

Species Observed at the Willow County Water District Water Main Replacement, Canyon Drive Project Site on 04/01/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Poa annua	Annual blue grass	Poaceae	Naturalized	FAC
Primula hendersonii	Henderson's shooting star	Primulaceae	Native	--
Prunus sp.	Prunus	Rosaceae	Introduced	--
Quercus lobata	Valley oak	Fagaceae	Native	FACU
Ranunculus muricatus	Rough-fruited buttercup	Ranunculaceae	Naturalized	FACW
Ranunculus occidentalis	Western buttercup	Ranunculaceae	Native	FACW
Rubus armeniacus	Himalayan blackberry	Rosacea	Invasive	FAC
Rumex crispus	Curley dock	Polygonaceae	Invasive	FAC
Sanicula crassicaulis	Pacific sanicle	Apiaceae	Native	--
Senecio vulgaris	Common groundsel	Asteraceae	Naturalized	FACU
Sisyrinchium bellum	Blue-eyed grass	Iridaceae	Native	FACW
Soliva sessilis	South American soliva	Asteraceae	Naturalized	FAC
Stachys rigida	Rough hedgenettle	Lamiaceae	Native	FACW
Stellaria media	Common chickweed	Caryophyllaceae	Naturalized	FACU
Taraxacum officinale	Common dandelion	Asteraceae	Naturalized	FACU
Thuja plicata	Western red cedar	Cupressaceae	Native	FAC
Toxicodendron diversilobum	Poison oak	Anacardiaceae	Native	FAC
Trifolium repens	White clover	Fabaceae	Naturalized	FAC
Umbellularia californica	California laurel	Lauraceae	Native	FAC
Veronica persica	Bird's-eye speedwell	Plantaginaceae	Naturalized	--
Vicia satvia	Common vetch	Fabaceae	Naturalized	UPL
Vinca major	Vinca	Apocynaceae	Invasive	FACU
Wildlife				
Anthus rubescens	American Pipit	Motacillidae	--	--
Aphelocoma californica	California Scrub-Jay	Corvidae	--	--
Baeolophus inornatus	Oak titmouse	Paridae	--	--

Species Observed at the Willow County Water District Water Main Replacement, Canyon Drive Project Site on 04/01/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Buteo jamaicensis	Red-tailed Hawk	Accipitridae	--	--
Corvus corax	Common Raven	Corvidae	--	--
Empidonax difficilis	Pacific-slope Flycatcher	Tyrannidae	--	--
Melanerpes formicivorus	Acorn Woodpecker	Picidae	--	--
Melozone crissalis	California Towhee	Passerellidae	--	--
Mimus polyglottus	Northern Mockingbird	Mimidae	--	--
Pipilo maculatus	Spotted Towhee	Passerellidae	--	--
Regulus satrapa	Golden-crowned Sparrow	Regulidae	--	--
Setophaga coronate	Yellow-rumped Warbler	Parulidae	--	--
Sitta carolinensis	White-breasted Nuthatch	Sittidae	--	--
Spinus psaltria	Lesser Goldfinch	Fringillidae	--	--
Streptopelia decaocto	Eurasian Collared-Dove	Columbidae	--	--
Turdus migratorius	American Robin	Turdidae	--	--

[1] Jepson Flora Project (eds.) 2024, Jepson eFlora, https://ucjeps.berkeley.edu/eflora/, accessed April 2024.

[2] Jepson Flora Project (eds.) 2024, Jepson eFlora, https://ucjeps.berkeley.edu/eflora/, accessed April 2024. Or Calfora. 2024. Information on California plants for education, research and conservation. Berkeley, California: The Calflora Database. Available: https://www.calflora.org/ Accessed: April 2024.

[3]U.S. Army Corps of Engineers 2020. National Wetland Plant List, version 3.5. http://wetland-plants.usace.army.mil/. Accessed April 2024.

OBL = Obligate wetland FACW = Facultative wetland FAC = Facultative FACU = Facultative upland UPL = Upland obligate

-- = No indicator status listed on 2020 National Wetland Plant List

Attachment 3

Representative Photos

Photo 1. Pomo Lane, facing north from southern end of Project site

Photo 2. Pomo Lane, facing northwest from middle of Project site; adjacent Valley Grassland

Photo 3. Pomo Lane, facing south from northern end of Project site

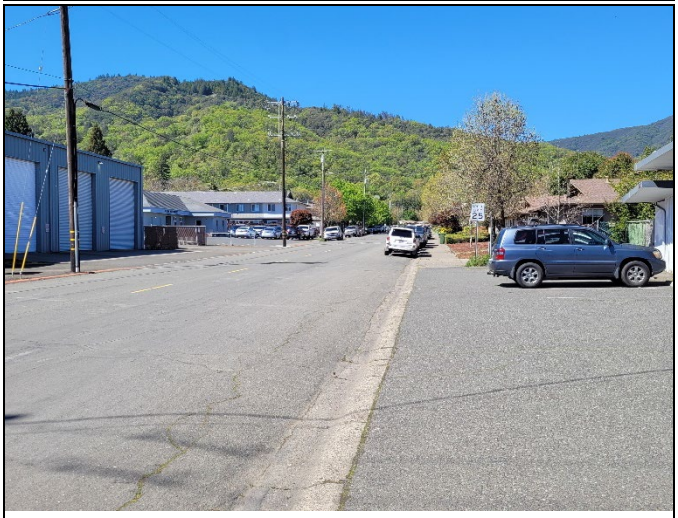

Photo 4. Laws Avenue, facing west from eastern end of Project site

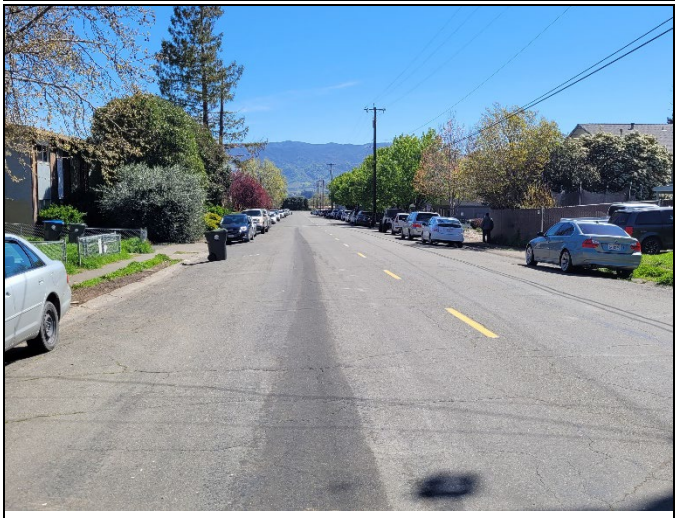

Photo 5. Laws Avenue, facing east from western end of Project site

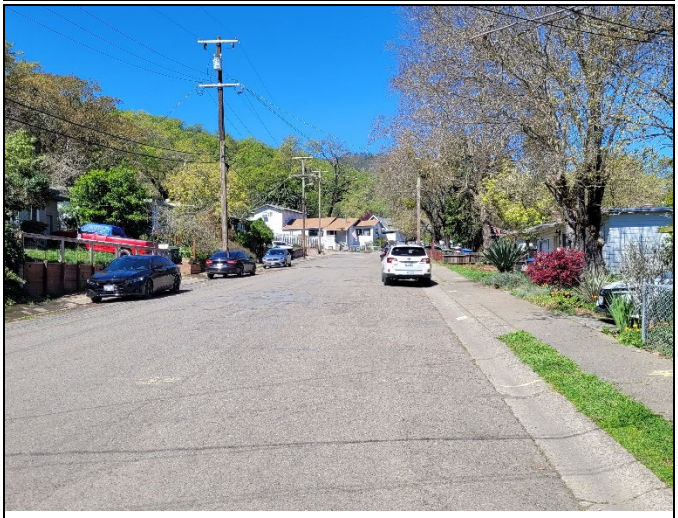

Photo 6. Canyon Drive, facing northwest from eastern end of Project site

Photo 7. Canyon Drive, facing southeast from middle of Project site

Photo 8. Canyon Drive, near western end of Project site facing east from private driveway

Photo 9. Canyon Drive, facing west from private driveway, showing Valley Oak Woodland

Pohto 10. Canyon Drive, western end of Project site facing east within Valley Oak Woodland

Photo 11. Canyon Drive, Intermittent Stream east of private driveway, facing northwest

APPENDIX C

Follow-up Botanical Survey

AREA WEST ENVIRONMENTAL, INC.
EST 2000

July 1, 2024

Paul Peck
LACO Associates
Via email: peckp@lacoassociates.com

SUBJECT: Followup Botanical Survey Results at the Willow County Water District Water Main Replacement Project (AWE #24-002).

Dear Mr. Peck:

To supplement the April 1, 2024 early-season botanical survey conducted for the biological resources survey report prepared for the Willow County Water District Water Main Replacement Project (Project), a second round of special-status plant surveys were conducted to determine the presence of sensitive plant species in the late blooming season. Specifically, the followup botanical survey was conducted to rule out the presence of Beaked tracyina (*Tracyina rostrata*) from the Project site. Provided below is a summary of the methods and results of the late-season (June 17, 2024) surveys.

The Project site is located in three locations in Ukiah, Mendocino County, California; from the eastern end of Laws Avenue to South Dora Street; Pomo Lane between Bethal Lane and Townsend Lane; and Canyon Lane from 150 feet west of its junction with Rosemary Lane and extending west into adjacent private properties.

Methods

Area West Environmental, Inc. (AWE) biologists, Mikhela Aiken and Claudia Kodsuntie, conducted a second special-status plant survey of the Project site on June 17, 2024. The survey was conducted by trained biologists familiar with California flora and fauna, including special-status species. Prior to conducting the survey, the biologists reviewed the biological resources survey results and species search results to determine the target species for the survey.

For the June 2024 survey, the biologists walked throughout the Project site checking for the presence of special-status plants and compiling a list of all botanical species observed within the Project site. All plants were identified to the lowest taxonomic level necessary to determine whether they are rare. Additionally, the intermittent stream present north of Canyon Drive was reobserved to confirm conditions noted in the April 1, 2024 survey.

Results

The biological resources survey identified 30 special-status plant species with potential to occur in the Project site. No special-status plant species were observed during the early-season survey, eliminating 20 special-status plant species whose identification (blooming) period overlapped with the survey. Of the 10 remaining special-status plant species, nine species were considered absent

because the Project site lacks suitable habitat for these species. The followup late season botanical survey was conducted to rule out the presence of Beaked tracyina from the Project site.

No Beaked tracyina or other special-status plant species were observed during the June plant survey.

No special-status plants were found within the Project site. Plant species observed during both surveys (spring and summer) are listed in Attachment 1.

The intermittent stream that runs along the back of private homes north of Canyon Drive was dry during the June survey. The streambed had been filled with leaf and plant litter. Few plants remained adjacent to the stream, though Himalayan blackberry (*Rubus armeniacus*) and hawkbit (*Leontodon saxatilis*) were dominant in that area. This stream has a hydrologic connection to the Russian River and is expected to qualify as an other waters of the U.S. Photos of the stream are included in Attachment 2.

Conclusion

No special-status species were encountered during the surveys conducted on June 17, 2024. No federally or state-listed species would potentially be affected by the Project. The botanical survey in June ruled out the presence of Beaked tracyina from the Project site.

There are no wetlands or jurisdictional waters located within the Project site. An unnamed intermittent stream, located north of Canyon Drive and outside the Project site, is expected to qualify as an other waters of the U.S. and would therefore be subject to jurisdiction by the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife. However, the Project would not affect this jurisdictional water. It is recommended that the waterway north of Canyon Drive is designated as an Environmentally Sensitive Area on project plans to instruct the contractor to avoid this feature.

Please call me at 916-987-3362 or email me at adour-smith@areawest.net with any questions.

Sincerely,

Aimee Dour-Smith

Aimee Dour-Smith
Senior Planner

Attachment 1 – Observed Plant List from April and June Surveys
Attachment 2 – Representative Photos

Attachment 1 - Observed Plant List from April and June Surveys

Species Observed at the Willow County Water District Water Main Replacement, Pomo Lane Project Site on 04/01/2024 and 06/17/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Allium triquetrum	Three-cornered garlic	Alliaceae	Naturalized	--
Arum italicum	Italian lords and ladies	Araceae	Naturalized	--
Avena barbata	Slender wild oat	Poaceae	Invasive	--
Brassica rapa	Field mustard	Brassicaceae	Invasive	FACU
Bromus commutatus	Meadow brome	Poaceae	Naturalized	--
Bromus diandrus	Ripgut brome	Poaceae	Invasive	--
Cardamine hirsuta	Hairy bitter cress	Brassicaceae	Naturalized	FACU
Carduus pycnocephalus	Italian thistle	Asteraceae	Invasive	--
Catalpa speciosa	Northern catalpa	Bignoniaceae	Naturalized	FACU
Cichorium intybus	Chicory	Asteraceae	Naturalized	FACU
Cynodon dactylon	Bermuda grass	Poaceae	Invasive	FACU
Eriobotrya japonica	Loquat	Rosaceae	Naturalized	--
Erodium moschatum	Whitestem filaree	Geraniaceae	Naturalized	--
Eschscholzia caespitosa	Tufted poppy	Papaveraceae	Native	UPL
Festuca arundinacea	Reed fescue	Poaceae	Invasive	--
Festuca myuros	Rattail sixweek grass	Poaceae	Invasive	--
Galium aparine	Goose grass	Rubiaceae	Native	FACU
Hordeum murinum	Wall barley	Poaceae	Invasive	FAC
Lactuca serriola	Prickly lettuce	Asteraceae	Naturalized	FACU
Lonicera japonica	Japanese honeysuckle	Caprifoliaceae	Invasive	FAC
Magnolia sp.	Magnolia	Magnoliaceae	Introduced	--
Malva nicaeensis	Bull mallow	Malvaceae	Naturalized	--
Medicago polymorpha	California burclover	Fabaceae	Invasive	FACU
Phalaris aquatica	Harding grass	Poaceae	Invasive	FACU
Plantago lanceolata	English plantain	Plantaginaceae	Invasive	FACU

Species Observed at the Willow County Water District Water Main Replacement, Pomo Lane Project Site on 04/01/2024 and 06/17/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Poa annua	Annual blue grass	Poaceae	Naturalized	FAC
Populus fremontii	Fremont's cottonwood	Betulaceae	Native	--
Prunus cerasifera	Plum cherry	Rosaceae	Naturalized	--
Prunus sp.	Prunus	Rosaceae	Naturalized	--
Quercus lobata	Valley Oak	Fagaceae	Native	FACU
Raphanus sativus	Jointed charlock	Brassicaceae	Invasive	--
Rosemarinus officinalis	Rosemary	Lamiaceae	Naturalized	--
Rumex crispus	Curly dock	Polygonaceae	Invasive	FAC
Senecio vulgaris	Common groundsel	Asteraceae	Naturalized	FACU
Taraxacum officinale	Common dandelion	Asteraceae	Naturalized	FACU
Spergularia rubra	Purple sand spurry	Caryophyllaceae	Naturalized	FAC
Trifolium repens	White clover	Fabaceae	Naturalized	FAC
Vicia villosa	Hairy vetch	Fabaceae	Naturalized	--
Vitis californica	California grape	Vitaceae	Native	FACU

Species Observed at the Willow County Water District Water Main Replacement, Laws Avenue Project Site on 04/01/2024 and 06/17/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Plants				
Avena barbata	Slender wild oat	Poaceae	Invasive	--
Bromus diandrus	Ripgut brome	Poaceae	Invasive	--
Cardamine hirsuta	Hairy bitter cress	Brassicaceae	Naturalized	FACU
Cynodon dactylon	Bermuda grass	Poaceae	Invasive	FACU
Erodium moschatum	Whitestem filaree	Geraniaceae	Naturalized	--
Eschscholzia californica	California poppy	Papaveraceae	Native	UPL

Species Observed at the Willow County Water District Water Main Replacement, Laws Avenue Project Site on 04/01/2024 and 06/17/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Euryops pectinatus	Grey-leaved euryops	Asteraceae	Naturalized	--
Festuca arundinacea	Reed fescue	Poaceae	Invasive	--
Festuca myuros	Rattail sixweek grass	Poaceae	Invasive	--
Galium aparine	Goose grass	Rubiaceae	Native	FACU
Geranium dissectum	Cut-leaved crane's-bill	Geraniaceae	Invasive	--
Hordeum murinum	Wall barley	Poaceae	Invasive	FAC
Juniperus sp.	Ornamental juniper	Cupressaceae	Naturalized	--
Lactuca serriola	Prickly lettuce	Asteraceae	Naturalized	FACU
Liriodendron tulipifera	Tuliptree	Magnoliaceae	Naturalized	--
Malva incaeensis	Bull mallow	Malvaceae	Naturalized	--
Medicago polymorpha	California burclover	Fabaceae	Invasive	FACU
Olea europaea	Olive	Oleaceae	Invasive	--
Poa annua	Annual blue grass	Poaceae	Naturalized	FAC
Poa bulbosa	Bulbous blue grass	Poaceae	Naturalized	FACU
Prunus sp.	Prunus	Rosaceae	Introduced	--
Quercus lobata	Valley oak	Fagaceae	Native	FACU
Rhaphiolepis indica	Indian hawthorn	Rosaceae	Naturalized	--
Rosemarinus officinalis	Rosemary	Lamiaceae	Naturalized	--
Senecio vulgaris	Common groundsel	Asteraceae	Naturalized	FACU
Sequoia sempervirens	Coast redwood	Cupressaceae	Native	--
Soliva sessilis	South American soliva	Asteraceae	Naturalized	FAC
Sonchus oleraceus	Common sow-thistle	Asteraceae	Naturalized	UPL
Taraxacum officinale	Common dandelion	Asteraceae	Naturalized	FACU
Toxicodendron diversilobum	Poison oak	Anacardiaceae	Native	FAC
Tribulus terrestris	Puncture vine	Zygophyllaceae	Invasive	--
Trifolium repens	White clover	Fabaceae	Naturalized	FAC
Veronica persica	Bird's-eye speedwell	Plantaginaceae	Naturalized	--

Species Observed at the Willow County Water District Water Main Replacement, Canyon Drive Project Site on 04/01/2024 and 06/17/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Plants				
Achillea millefolium	Yarrow	Asteraceae	Native	FACU
Adelinia grandis	Adelinia	Boraginaceae	Native	--
Aira caryophyllea	Silvery hairgrass	Poaceae	Naturalized	FACU
Allium neapolitanum	White garlic	Alliaceae	Naturalized	--
Allium triquetum	Three-cornered garlic	Alliaceae	Naturalized	--
Arbutus menziesii	Pacific madrone	Ericaceae	Native	UPL
Arum italicum	Italian lords and ladies	Araceae	--	
Arbutus menziesii	Pacific madrone	Ericaceae	Native	UPL
Berberis aquifolium	Oregon grape	Berberidaceae	Native	--
Brassica rapa	Field mustard	Brassicaceae	Invasive	FACU
Briza maxima	Rattlesnake grass	Poaceae	Invasive	--
Briza minor	Little rattlesnake grass	Poaceae	Naturalized	FAC
Bromus diandrus	Ripgut brome	Poaceae	Invasive	--
Cardamine hirsuta	Hairy bitter cress	Brassicaceae	Naturalized	FACU
Carduus pycnocephalus	Italian thistle	Asteraceae	Invasive	--
Cichorium intybus	Chicory	Asteraceae	Naturalized	FACU
Chlorogalum pomeridianum var. *pomeridianum*	Waveyleaf soap plant	Agavaceae	Native	--
Claytonia perfoliata	Miner's lettuce	Portulacaceae	Native	FAC
Cynosurus echinatus	Bristly dogtail grass	Poaceae	Invasive	--
Cyperus eragrostis	Tall flatsedge	Cyperaceae	Native	FACW
Elymus glaucus	Blue wildrye	Poaceae	Native	FACU
Erodium moschatum	Whitestem filaree	Geraniaceae	Naturalized	--
Euphorbia peplus	Petty spurge	Euphorbiaceae	Naturalized	--
Festuca myuros	Rattail sixweek grass	Poaceae	Invasive	--

Species Observed at the Willow County Water District Water Main Replacement, Canyon Drive Project Site on 04/01/2024 and 06/17/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Galium aparinum	Goose grass	Rubiaceae	Native	FACU
Geranium dissectum	Cut-leaved crane's-bill	Geraniaceae	Invasive	--
Hordeum murinum	Wall barley	Poaceae	Invasive	FAC
Iris macrosiphon	Ground iris	Iridaceae	Native	--
Iris pseudacorus	Yellow iris	Iridaceae	Invasive	OBL
Lamium purpureum	Purple dead nettle	Lamiaceae	Naturalized	--
Lathyrus vestitus	Common pacific pea	Fabaceae	Native	--
Leontodon saxatilis	Hawkbit	Asteraceae	Naturalized	FACU
Leucojum aestivum	Summer snowflake	Amaryllidaceae	Naturalized	--
Liriodendron tulipifera	Tuliptree	Magnoliaceae	Naturalized	--
Lomatium californicum	California lomatium	Apiaceae	Native	--
Lonicera hispidula	Pink honeysuckle	Caprifoliaceae	Native	FACU
Luzula comosa	Pacific wood-rush	Juncaceae	Native	FAC
Malva nicaeensis	Bull mallow	Malvaceae	Naturalized	--
Medicago polymorpha	California burclover	Fabaceae	Invasive	FACU
Oxalis articulata ssp. rubra	Windowbox woodsorrel	Oxalidaceae	Naturalized	--
Paspalum dilatatum	Dallis grass	Poaceae	Naturalized	--
Pentagramma triangularis	Goldenback fern	Pteridiaceae	Native	--
Phoradendron leucarpus subsp. macrophyllum	Big leaf mistletoe	Viscaceae	Native	--
Plantago lanceolata	English plantain	Plantaginaceae	Invasive	FACU
Poa annua	Annual blue grass	Poaceae	Naturalized	FAC
Primula hendersonii	Henderson's shooting star	Primulaceae	Native	--
Prunus sp.	Prunus	Rosaceae	Introduced	--
Quercus lobata	Valley oak	Fagaceae	Native	FACU
Ranunculus muricatus	Rough-fruited buttercup	Ranunculaceae	Naturalized	FACW
Ranunculus occidentalis	Western buttercup	Ranunculaceae	Native	FACW

Species Observed at the Willow County Water District Water Main Replacement, Canyon Drive Project Site on 04/01/2024 and 06/17/2024				
Scientific Name[1]	**Common Name[2]**	**Family[1]**	**Nativity[1]**	**Wetland Indicator Status (Western Mountains, Valleys, and Coast Region)[3]**
Rubus armeniacus	Himalayan blackberry	Rosacea	Invasive	FAC
Rumex crispus	Curley dock	Polygonaceae	Invasive	FAC
Sanicula crassicaulis	Pacific sanicle	Apiaceae	Native	--
Senecio vulgaris	Common groundsel	Asteraceae	Naturalized	FACU
Sisyrinchium bellum	Blue-eyed grass	Iridaceae	Native	FACW
Soliva sessilis	South American soliva	Asteraceae	Naturalized	FAC
Spergularia rubra	Purple sand spurry	Zygophyllaceae	Naturalized	FAC
Stachys rigida	Rough hedgenettle	Lamiaceae	Native	FACW
Stellaria media	Common chickweed	Caryophyllaceae	Naturalized	FACU
Stipa pulchra	Purple needle grass	Poaceae	Native	--
Taraxacum officinale	Common dandelion	Asteraceae	Naturalized	FACU
Thuja plicata	Western red cedar	Cupressaceae	Native	FAC
Torilis arvensis	Field hedge parsley	Apiaceae	Invasive	--
Toxicodendron diversilobum	Poison oak	Anacardiaceae	Native	FAC
Trifolium hirtum	Rose clover	Fabaceae	Invasive	--
Trifolium repens	White clover	Fabaceae	Naturalized	FAC
Umbellularia californica	California laurel	Lauraceae	Native	FAC
Veronica persica	Bird's-eye speedwell	Plantaginaceae	Naturalized	--
Vicia satvia	Common vetch	Fabaceae	Naturalized	UPL
Vinca major	Vinca	Apocynaceae	Invasive	FACU

[1] Jepson Flora Project (eds.) 2024, Jepson eFlora, https://ucjeps.berkeley.edu/eflora/, accessed June 2024.

[2] Jepson Flora Project (eds.) 2024, Jepson eFlora, https://ucjeps.berkeley.edu/eflora/, accessed June 2024. Or Calfora. 2024. Information on California plants for education, research and conservation. Berkeley, California: The Calflora Database. Available: https://www.calflora.org/ Accessed: June 2024.

[3]U.S. Army Corps of Engineers 2020. National Wetland Plant List, version 3.5. http://wetland-plants.usace.army.mil/. Accessed June 2024.

OBL = Obligate wetland FACW = Facultative wetland FAC = Facultative FACU = Facultative upland UPL = Upland obligate

-- = No indicator status listed on 2020 National Wetland Plant List

Attachment 2

Representative Photos

Photo 1. Intermittent Stream north of Canyon Drive. Facing west. Taken June 17, 2024.

Photo 2. Intermittent Stream north of Canyon Drive. Facing east. Taken June 17, 2024.