

CALIFORNIA ENVIRONMENTAL QUALITY ACT

DRAFT INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION FOR LOOKOUT PEAK TRAIL PROJECT



July 3, 2025
SCH No: XXXXXXXXXX

Prepared by:

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Table of Contents

| | |
|--|-----------|
| I. PROJECT INFORMATION | 1 |
| II. PROJECT DESCRIPTION | 2 |
| 1. <i>Project Location</i> | 2 |
| 2. <i>Environmental Setting</i> | 2 |
| 3. <i>Background</i> | 3 |
| 4. <i>Project Components</i> | 5 |
| III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED | 8 |
| IV. DETERMINATION | 11 |
| V. EVALUATION OF ENVIRONMENTAL IMPACTS | 12 |
| 1. <i>Aesthetics</i> | 12 |
| 2. <i>Agriculture and Forestry Resources</i> | 15 |
| 3. <i>Air Quality</i> | 16 |
| 4. <i>Biological Resources</i> | 18 |
| 5. <i>Cultural Resources</i> | 23 |
| 6. <i>Energy</i> | 25 |
| 7. <i>Geology and Soils</i> | 27 |
| 8. <i>Greenhouse Gas Emissions</i> | 29 |
| 9. <i>Hazards and Hazardous Materials</i> | 30 |
| 10. <i>Hydrology and Water Quality</i> | 34 |
| 11. <i>Land Use and Planning</i> | 35 |
| 12. <i>Mineral Resources</i> | 37 |
| 13. <i>Noise</i> | 38 |
| 14. <i>Population and Housing</i> | 40 |
| 15. <i>Public Services</i> | 41 |
| 16. <i>Recreation</i> | 42 |
| 17. <i>Transportation</i> | 44 |
| 18. <i>Tribal Cultural Resources</i> | 46 |
| 19. <i>Utilities and Service Systems</i> | 47 |
| 20. <i>Wildfire</i> | 49 |
| 21. <i>Mandatory Findings of Significance</i> | 50 |
| VI. REFERENCES | 52 |
| VII. MITIGATION MONITORING AND REPORTING PROGRAM | 55 |
| VIII. ATTACHMENTS | 57 |
| A. <i>Existing Conditions Photographs</i> | |
| B. <i>Final Recorded Map and Deed (LLA25-000003)</i> | |
| C. <i>City of Ukiah Native Plant Palette</i> | |
| D. <i>Ukiah Valley Trail Group Philosophy and Design and Maintenance Standards</i> | |
| E. <i>Fire- Hardened Trails (Vegetation Management Corridors)</i> | |
| F. <i>Biological Assessment Report</i> | |
| G. <i>Concept Trail Map</i> | |

I. PROJECT INFORMATION

Project Title:

Lookout Peak Trails

Lead Agency Address and Phone Number:

City of Ukiah
300 Seminary Avenue
Ukiah, California 95482
(707) 463-6200

Project Contact Person and Phone Number:

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Project Location: The trail would be located on a City-owned parcel located in the City on Ukiah's Western Hills Watershed Protection Area

General Plan Designation: Public (P)

Zoning District: Public Facilities (PF)

II. PROJECT DESCRIPTION

1. Project Location

The project is located in the City of Ukiah approximately 100 miles north of San Francisco. The approximately 760-acre project site is situated to the immediate west of the City of Ukiah in the City's Western Hills Watershed Protection Area (WHWPA). **Figure 1** below provides a location map for the WHWPA. Photographs of the existing site and conditions are included as **Attachment A**.

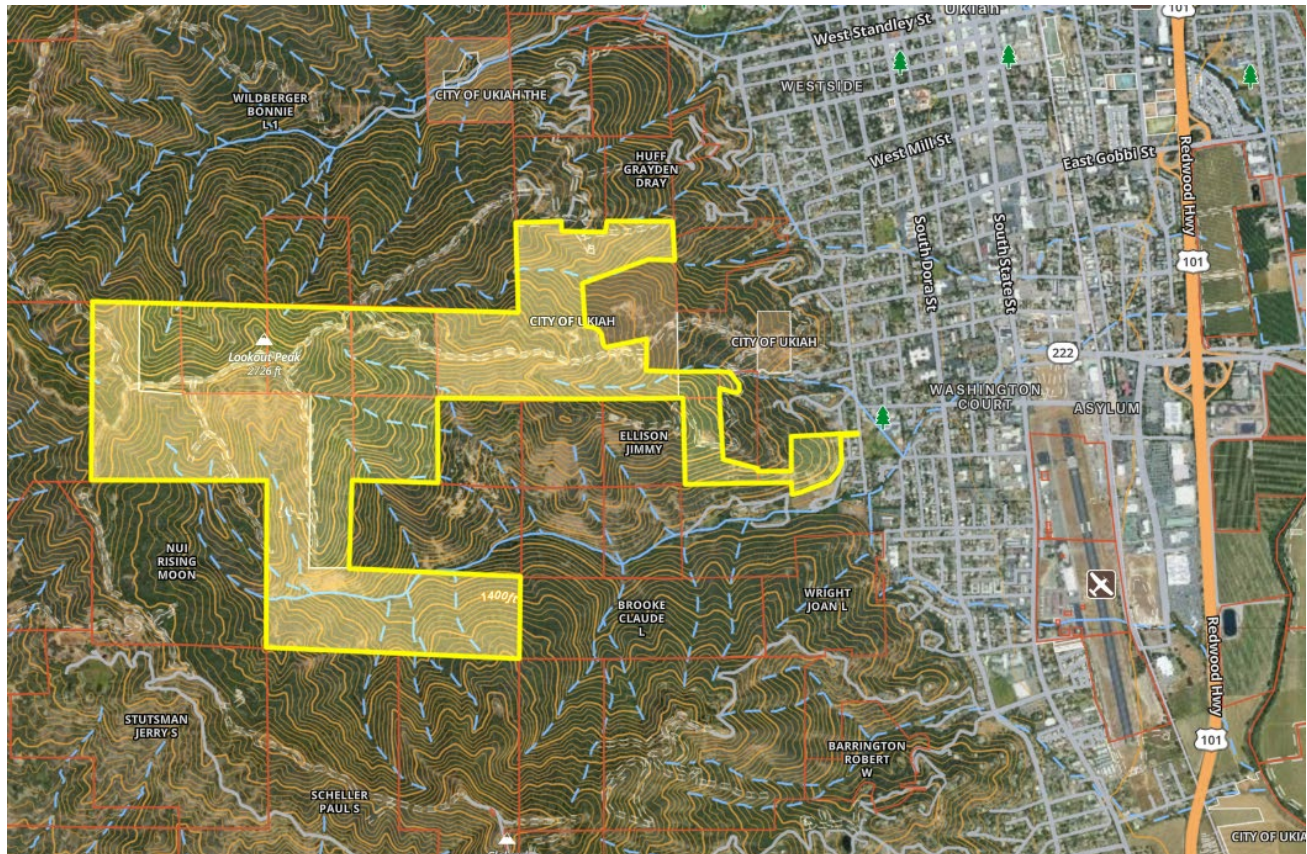


Figure 1, Project Location; City of Ukiah Western Hills Watershed Protection area in yellow.

2. Environmental Setting

The Project area is situated within the Coast Range geologic province. The North Coast Range is comprised of a geologic feature unique to California, the Franciscan Formation, which dictates the vegetative communities. The Franciscan Formation is comprised of serpentine, sandstone, and other sedimentary rocks. This area is characterized by a Mediterranean climate; the winters are cool and wet, and the summers are hot and dry. Annual average temperatures for this region range from about 30 to 100 degrees Fahrenheit.

The Project is located within the Ukiah Valley in central Mendocino County. The Ukiah Valley is located approximately 30 miles east and inland from the Pacific Ocean. It runs north-south for approximately

nine miles, with a maximum width of three miles, with elevations varying from approximately 600-feet above mean sea level up to approximately 3,000 feet in the hills surrounding the city, including the Western Hills. The Russian River enters the valley at the north end and runs south along the valley floor. The City of Ukiah is located along the Highway 101 corridor and near the east/west intersection of Highway 20, two hours north of the Golden Gate Bridge. Incorporated in 1876, Ukiah is the county seat and largest city in Mendocino County.

Vegetation communities in the area include mixed oak, isolated and sparse redwood and Douglas fir forest stands, chaparral, and manzanita. The project will create a trail system of approximately eighteen miles. Trails will be predominantly under a substantial tree canopy cover or hidden by high chamise rendering it invisible from the valley floor. The project area includes ridge roads and a one acre area that was used as a cannabis grow site but is otherwise substantially native and undisturbed which will be restored as part of the project. The southern portion of the project area drains to the class I Doolin Creek, and the northern area drains to two un-named class III drainages.

3. Background

A series of three sequential Lot Line Adjustments were recorded over the last year, resulting in the current parcel configuration (**Figure 2**), approved by the City Engineer on January 24, 2025. **Attachment B** includes the Final Recorded Map and analogous Quitclaim Deed

An existing road, installed in the 1960's, climbs from the end of Redwood Ave directly up the spine of the ridge for two and a half miles to the western edge of the property. The road was improved in 2015-2017 and the lower section is now paved as it crosses private property for approximately three quarters of a mile. The City of Ukiah holds an access easement across this property for city staff and maintenance access. Approximately 300 yards up the private portion of Redwood Avenue, a half-mile-long spur road provides access to the south. A previous owner of this portion of the property cleared and levelled a one-acre area for cannabis cultivation. Remnants of the grow site remain including footings from a "grow house." The cannabis grow site will be cleaned and restored as part of the project. A variety of fire breaks and roads extend parallel and perpendicular to the main road adding 2.5 miles to the system for a total of five and a half miles of roads and firebreaks on the site.

Public access to the trail system will be from two trailheads approximately 350 feet apart on Helen Avenue and Doolin Canyon Road.

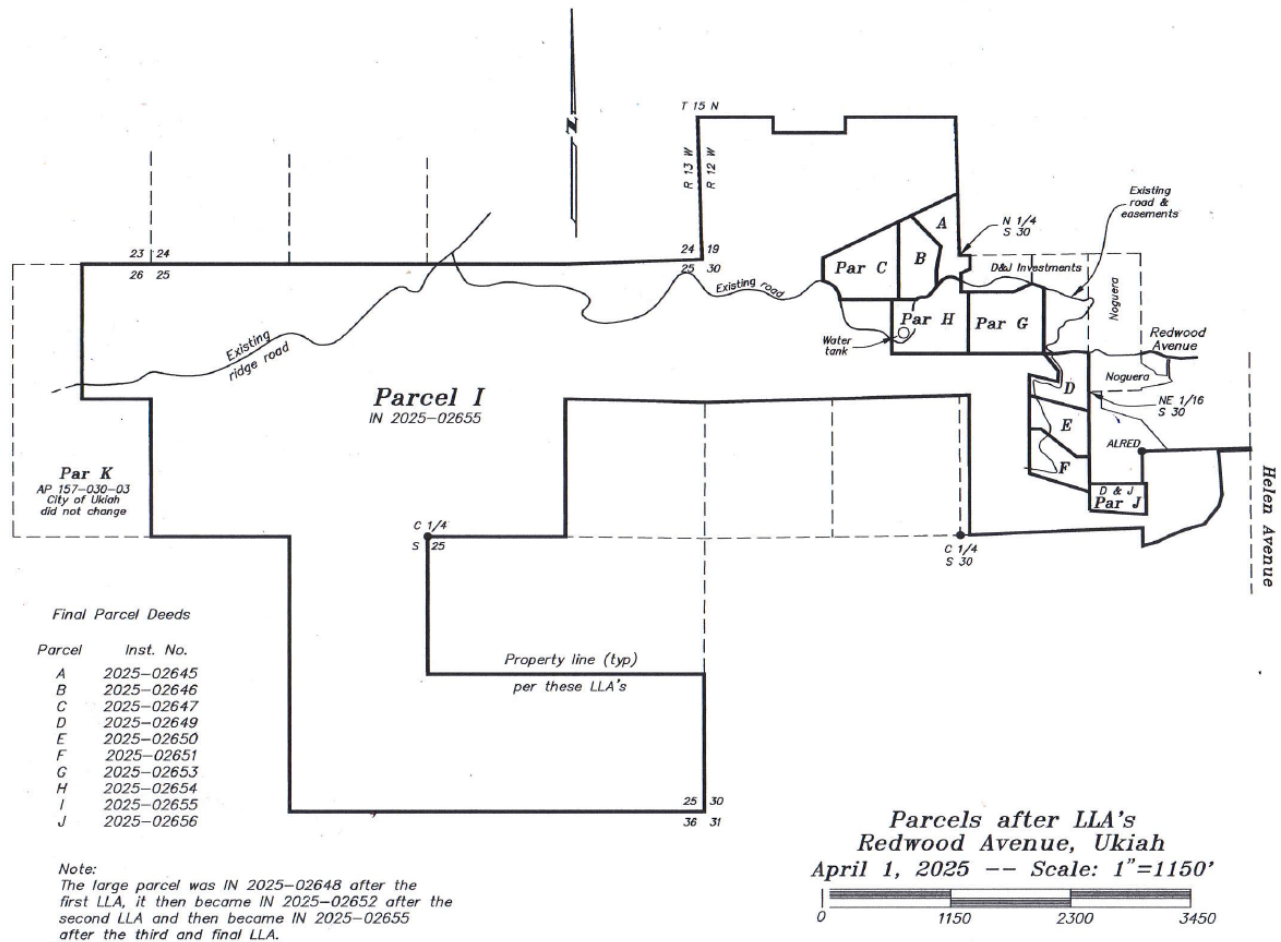


Figure 2, Lot Line Adjustment; File No. LLA25-000003 Parcel I (Inst. No. 2025-02655)

The use of the WHWPA is governed by the City's Western Hills Watershed Protection Area Management Plan (Adopted, 2023). Recreational non-motorized trails are an allowed use per the Plan.

The proposed trail routes and design (**Figure 2**) were established by *Rock Solid Trail Contracting* and Jon Schubbe Consulting. Additionally, the routes have been reviewed and approved by the Ukiah Valley Trail Group (UVTG), a volunteer non-profit organization dedicated to preserving, enhancing, and establishing trails in the Inland of Mendocino County. UVTG staff and volunteers have extensive experience in trail design, building, and maintenance and will build and maintain the trails.

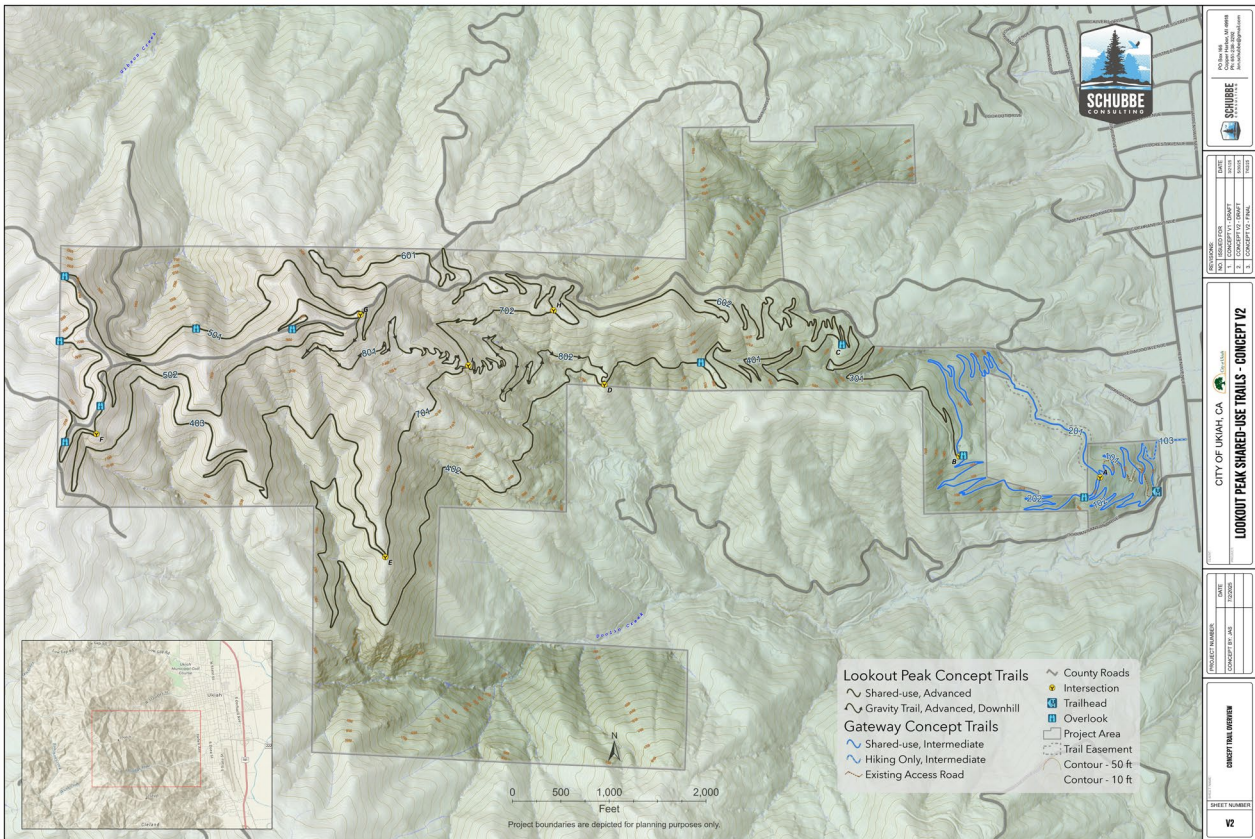


Figure 3, Concept Trail Plan

4 Project Components

The Project proposes the development of a passive use public access trail system for hiking, mountain biking, and access to nature. GIS mapping of the trail system has been completed and is represented in Figure 2. The concept trail alignments were created by Jon Schubbe Consulting. The alignments were informed by onsite evaluations and scoping followed by computer assisted layout design. The trail system will include two trailheads accessed from public street locations off Helen Ave and Doolin Canyon Ave approximately 350 feet apart.

The trail system provides a “Stacked Loop” design allowing users a wide variety of options with up to 18 miles of trails. The system lays out approximately three miles of trail in the “Gateway” area and an additional fourteen miles of trails in the Lookout Peak area. The Gateway area will provide two small loops identified on the map as the 100 and 200 series segments that are expected to see the most use. A single out and back trail (segment 301) will connect the Gateway area (lower loops) to the upper loops of the Lookout Peak area (400 500, 600, 700, and 800 series segments). The 600 through 800 segments will create three loops with a mountain bike downhill-only trail bisecting two of the upper loops (**Figure 3**). The top loop will circumnavigate the upper extent of the property and provide 360-degree views of three different watersheds. Additionally, the Lookout Peak area trails will provide multiple interfaces with existing truck roads providing additional options for users who care to experience the roads.

At the top of the Gateway area at the intersection of trail segments 201, 202, and 301 (Intersection B in Figure 2) there is a one-acre flat area that was created by a previous owner for a Cannabis grow site (**Figure 4**). The concrete footings and galvanized steel poles remain from a cannabis “grow house.” This project will remove these footings and any remaining detritus and restore the area with native plants. Restoration will be provided by Ukiah Valley Trail Group staff, volunteers, and or contractors with consultation from subject matter experts and informed by the City of Ukiah’s Native Plant Palette (**Attachment C**)



Figure 4, Remnants of Cannabis Grow Site

The trails will be built in accordance with the UVTG Design and Maintenance Standards (**Attachment D**). Trail construction will utilize a variety of power and hand tools. Concept trail alignments will be verified on the ground with the assistance of GIS mapping tools to finalize trail alignments and mark the path of construction. Vegetation and detritus materials will be removed to establish the trail’s path and contour. The trail is designed to minimize impacts on this natural vegetation, but the grading required to establish the 2 to 4-foot-wide trail at a relatively even grade will require the removal of groundcover and bushes along its entire length. The initial trail cutting and shaping will utilize a small excavator designed specifically for trail construction. Base cuts will be made to remove the uppermost organic layer and expose base soils while causing minimal disturbances to trailside banks. This

method also allows for the construction of a combination of three percent out-slopes, rolling dips, grade reversals, and tapered shoulders that are designed to allow sheet water drainage patterns over the trail to reduce erosion and subsequent maintenance. Finishing and shaping of the trail will utilize a variety of power and hand tools such as power wheelbarrows, vibra-plates, jackhammers, and hand tools.

Trail grades will vary according to topography with average grades of 7 to 8 percent, for the majority of the trails, with some shorter trail sections in the steeper areas reaching approximately 12 percent. Trail stairs may be used in particularly steep sections. However, trail routes will ensure that the average grade for the entirety of the trail does not exceed the 10 percent threshold suggested in the UVTG standards. The proposed trail will run almost entirely beneath a substantial tree canopy cover of natural woodlands consisting mainly of native tree and understory species (see photos in **Attachment A**). In accordance with the UVTG Design and Maintenance Standards, the trail will be 2 to 4 feet wide, back sloped to create an angle of repose and built using a variety of best-practice methods including out sloping and rolling dips to allow sheet water drainage. The proposed trail alignments will not cross or approach Doolin Creek . All construction will follow the UVTG Design and Maintenance Standards intended to reduce erosion. Seasonal and class III drainages and swales will be hardened or spanned with small footbridges with footings outside of the bed and bank of the drainage.

After construction the UVTG will consult with the Ukiah Valley Fire Authority to assess trail segments that may be appropriate for “fire-hardening” (**Attachment E**). A Fire-Hardened Trail is a designated and managed corridor that combines both vegetation management and recreational trails. It is a corridor where the preservation and enhancement of the forest plays a significant role in forest restoration and fuels reduction work and is integrated with the creation of trails for recreational use. Fire hardened trails are similar to shaded fuel breaks and serve as multi-functional spaces that cater to both environmental conservation and community well-being. They are designed to provide a harmonious blend of nature and recreation, promoting a healthier lifestyle while preserving and enhancing the natural environment.

The proposed trail route and design was established by Rock Solid Construction, Jon Schubbe Consulting, and the UVTG. Trail alignments were selected to maintain consistent slope integrity and to keep disturbances to natural areas at minimal levels. Trimming of encroaching tree branches will be required along portions of the trail. Tree branch pruning, trimming, and root care activities will be limited to those branches and roots that would represent hazards to trail users or cause extensive detours and additional grading for the trail route. The trail crosses a few areas of dense, immature redwood and other trees of less than 6 feet diameter breast height (dbh). Thinning of these small, immature trees will be required to create a trail corridor. Clearing of these dense stands of immature trees will reduce fuel load while leaving many small trees on both sides of the trail for continued growth.

Project funding is expected to come from donations, grants, and UVTG fundraising. Maintenance will be provided by the UVTG in collaboration with the City of Ukiah.

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

Purpose of the Initial Environmental Study: This Initial Study has been prepared consistent with CEQA Guidelines Section 15063, to determine if the Project, as proposed, would have a significant impact upon the environment.

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

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

Summary of Findings: The Project proposes the development of up to 18 miles of narrow-gauge natural surface trail for hiking and mountain biking in the City of Ukiah's Western Hills Watershed Protection Area. The proposed trail routes and design were established by Rock Solid Trail Construction, **John Schubbe Consulting** and the UVTG. The trail system is designed to maintain consistent slope integrity and to keep disturbances to natural areas at minimal levels.

The trails will be built in accordance with the UVTG Design and Maintenance Standards (**Attachment D**). Without mitigations, the project could potentially have significant negative impacts in the areas of Air Quality, Biological Resources, Hydrology/water Quality, Hazards and Hazardous Materials, and Wildfire.

Upon completion the trails will not be visible from the valley floor. The trails themselves are part of the aesthetic experience trail users seek when recreating. As such, the project will have no significant impact on Aesthetics. No Farmland will be lost and the project does not conflict with agricultural zoning or the Williamson act. No forest land will be lost and the project does not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

Trail construction will be completed with small excavators and smaller power tools such as chainsaws, power wheelbarrows, vibra-plates, or jackhammers. Mitigations will be necessary to ensure these power tools do not adversely affect air quality.

Both construction of the trail and the introduction of recreational use may require mitigations to avoid significant impacts to the biology and wildlife in the area. Mitigations to avoid impact to sensitive and special status species and natural communities will be required. However, no adverse effect on

protected wetlands are expected nor will there be significant impact on migratory fish or impede the use of wildlife corridors. The project will have no impact on any existing conservation plans. A Biological Assessment and Wildlife Survey (**Attachment F**) of the project area was performed by Jacobszoon and Associates and provides appropriate mitigations to decrease impacts to a less than significant level.

A records search conducted on June 17, 2025, at the Northwest Information Center (NWIC) revealed no historical or archaeologically significant sites within the project area. Reviews of historic registers and inventories confirmed the absence of historical landmarks or National Register listed or eligible properties. In addition, an Archaeological Survey Report (ASR), prepared by Alta Archaeological Consulting (Alta) in March 2021, covering a portion of the Project area, found no cultural resources. The report is omitted for confidentiality. Consequently, the project will not cause a substantial adverse change in the significance of any historical resources as defined in §15064.5.

In compliance with AB 52, a notification was sent to the Guidiville Rancheria of California on June 17, 2025, offering the opportunity for consultation. No response has been received to date. Should a response or consultation request be received within the AB 52 response window, the environmental review will be updated accordingly.

The project does not risk significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation nor does the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Further, the project does not directly or indirectly risk potential adverse effects due to land movement or result in substantial soil erosion or the loss of topsoil. The project will not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, nor does it conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

No hazardous materials will be used for the construction or use of the trails and there is no reasonably foreseeable reason to expect the release of hazardous materials associated with the project within or beyond a half mile of a school. The project is not 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. The project does not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

While there is no evidence that trail systems and their users increase the risk of wildland fires, the construction of the trails could potentially ignite a fire and expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. This risk is deemed less than significant with the identified mitigations.

The Project would significantly impact hydrology and water quality if it violated water quality standards or waste discharge requirements or substantially degraded surface or groundwater quality; substantially decreased groundwater supplies or impeded sustainable groundwater management; altered drainage patterns in a manner that would cause substantial on- or off-site erosion, polluted runoff or excessive runoff that caused flooding; impeded or redirected flood flows; risked a release of pollutants due to inundation if in a flood hazard, tsunami or seiche zone; or conflicted with a water quality plan or sustainable groundwater management plan. Of the aforementioned, only the risk of substantial erosion or siltation rises to the level of requiring mitigations. With the identified mitigation measures the project has less than significant impact on hydrology and water quality.

The project is in line with the goals established in the City's 2040 General Plan and the Ukiah Valley Area Plan (2011). Additionally, the project is supported by the Western Hills Watershed Protection

Area Management Plan (2024). In sum, the project does not divide an established community or interfere with any land use plans.

The project will have no impact on the availability of a known mineral resource that would be of value to the region and the residents of the state nor will it 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.

Power equipment will be used for trail construction and will create noise that will be heard at lower elevations, from the valley floor. However, the rated noise level of the loudest equipment will not temporarily or permanently exceed local noise standards in the vicinity of the Project, generate excessive ground borne noise or vibration; or expose people residing or working in the area to excessive noise levels from public airports or private airstrips.

The Project will have no significant impact on public services, recreation, or transportation. No tribal cultural resources have been identified in the Project area and there are no current or eligible sites listed in the California Register of Historic Places. All required tribal notifications have been fulfilled.

The Project will not result in the construction or expansion of utilities that could cause significant environmental effects; have insufficient water supplies available to the Project during normal to extremely dry years; result in inadequate capacity of the wastewater treatment plant; generate solid waste exceeding the capacity of local infrastructure or impairing the achievement of solid waste reduction goals; or fail to comply with any management and reduction statutes or regulations related to solid waste.

The Project will not impair an adopted emergency response plan or emergency evacuation plan. While the Project does include the construction of a trail, there is no evidence that the existence or use of a trail increases fire risk. Temporary construction activities involving the use of gasoline-powered tools and equipment could introduce new temporary sources of ignition that could increase fire risk. However, with implementation of identified mitigation measures, impacts would be reduced to less than significant.

Cumulative impacts are generally considered in analyses of Air Quality, Biological Resources, Hydrology/Water Quality, Hazards and Hazardous Materials, and Wildfire. As discussed throughout the Initial Study, the Proposed Project would either have a less than significant impact, or less than significant impact with implementation of mitigation measures on these resources, as described herein. Short-term construction impacts associated with the Project would not significantly contribute to cumulative impacts in the area as there are no known past projects nor current projects within the vicinity of the site. Based on the findings and conclusions contained in the Initial Study, cumulative impacts related to the Proposed Project would be **less than significant with mitigation incorporated**.

In summary, based upon the analysis contained within this Initial Study and Mitigated Negative Declaration, all potential impacts resulting from the Proposed Project would be **less than significant with incorporation of mitigation**.

IV. DETERMINATION

On the basis of the initial evaluation that follows:

☐ 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 mitigation measures and project revisions have been identified that would reduce all impacts to a less than significant level. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed Project MAY have a significant effect on the environment. 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.

Katherine Schaefers

Signature

Katherine Schaefers, Planning Manager
Community Development Department
City of Ukiah
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V. EVALUATION OF ENVIRONMENTAL IMPACTS

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to provide an analysis of the potential environmental consequences as a result of the proposed Project. The environmental evaluation relied on the following categories of impacts, noted as column headings in the IS checklist, in accordance with CEQA Guidelines Appendix G.

“Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.

Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.”

“Less Than Significant Impact” applies where the Project would not result in a significant effect (i.e., the Project impact would be less than significant without the need to incorporate mitigation).

“No Impact” applies where the Project would not result in any impact in the category or the category does not apply. This may be because the impact category does not apply to the proposed Project (for instance, the Project Site is not within a surface fault rupture hazard zone), or because of other project-specific factors.

1. Aesthetics

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

Significance Criteria: Aesthetic impacts would be significant if the Project resulted in the obstruction of any scenic vista open to the public, damage to significant scenic resources within a designated

State scenic highway, substantial degradation to the existing visual character or quality of the site and its surroundings from public views, or generate new sources of light or glare that would adversely affect day or nighttime views in the area, including that which would directly illuminate or reflect upon adjacent property or could be directly seen by motorists or persons residing, working or otherwise situated within sight of the Project.

Environmental Setting: As discussed in the City of Ukiah's 2040 General Plan, one of the most notable scenic resources in the City limits is the Western Hills. The surrounding hills frame the valley, creating an aesthetic resource for residents and visitors. Views of expansive undeveloped hillsides to the north, east and south, within the County jurisdiction, also surround the City. Many open space and scenic areas in Mendocino County are protected under easements managed by land trusts, none of which are located within the vicinity of the Proposed Project. Some surrounding hillsides are densely forested with evergreen trees, while others are relatively open in comparison, dominated by mature oak trees set amid scrub and grasslands. Some residential development is visible within the Western Hills from the valley floor. Water in the form of creeks, streams, and rivers is often a prominent feature in the landscape as well. Protecting the natural scenic features has been a priority for the City of Ukiah.

The Project site consists of an undeveloped parcel immediately west and uphill from Helen Avenue. Jacobszoon & Associates conducted a biological assessment and botanical survey of the area (**Attachment F**) and identified the area as classified under three MCV2 classification systems: (1) *Quercus wislizeni*-*Quercus chrysolepis* (shrub) Shrubland Alliance, (2) *Arctostaphylos* (canescens, manzanita, stanfordiana) Shrubland Alliance, and (3) *Pinus sabiniana* Woodland. These communities are considered non-sensitive and thus require no special protection. No sensitive biological communities were identified.

Three watercourses flow through the Study Area including Doolin Creek, a Class I watercourse, and two unnamed Class III watercourses. The Class I watercourse is classified by the United States Fish and Wildlife Service's (USFWS) National Wetland Inventory (NWI) (Appendix D: Map 7, National Wetlands Inventory) as a Riverine System which includes all wetland and deepwater habitats contained within a channel. The Study Area has a 100-Year Flood Zone hazard rating of moderate according to the FEMA National Flood Hazard Layer (NFHL) (Appendix D: Map 8, NFHL 100-Year Flood Zone). No trails are planned to cross or provide views of Doolin Creek. Segments 301 and 401 will cross class III water courses providing trail users with a seasonal opportunity to view running water.

No special-status species were observed during the biological site assessment. The biological site visit and botanical survey was conducted during the blooming period for the species identified.

Discussion: (a & c) Less than significant impact. Scenic vistas are typically described as areas of natural beauty with features such as topography, watercourses, rock outcrops, and natural vegetation that contribute to the landscape's quality. The Western Hills are considered a scenic vista as viewed from the valley floor. Generally speaking, public views of the Western Hills are available from roadways, and adjacent residential areas within the valley floor. Conversely, expansive views of the valley are provided from vantage points within the Western Hills, particularly from trails such as will become available with the completion of this project.

Almost the entire trail system will be situated beneath the natural forest canopy (see photos in **Attachment A**) and would not be seen from public vantage points. The fairly narrow (2 to 3-foot) proposed trail has been designed to avoid substantial vegetation and tree removal. Although some

vegetation removal will be required, it would not result in a substantial impact to views of the Western Hills, as the trail would not be visible from public vantage points within the valley floor, and the trail would be similar in nature to the existing City View and Sol y Sombra Trails, as well as other trails in the surrounding area. Similarly, impacts associated with the period of trail construction would be considered temporary and minimal. Lastly, the trail would offer vantage points containing views of valuable aesthetic resources. For the aforementioned reasons, the Project would not result in a significant impact to scenic vistas, nor the visual character of the site or area.

(a) Impacts would be **less than significant**.

(b) **No impact.** According to the California Department of Transportation's (Caltrans) State Scenic Highway System Map, there are no designated state scenic highways within the vicinity of the Project. In addition, there are no highways identified as eligible for state designation. Therefore, the Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Lastly, the City's General Plan, the County General Plan does not designate any local scenic roads in the Project area; **no impact** to scenic resources within a designated scenic corridor would occur.

(c) **No Impact**

(d) **No impact.** Construction would take place during daylight hours and no lighting is proposed along the trail. **No impact** would occur.

Mitigation Measures: None

2. Agriculture and Forestry Resources

| AGRICULTURE AND FORESTRY RESOURCES. Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact |
|--|--------------------------------|---------------------------------------|------------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

Environmental Setting: Early agricultural efforts in the Ukiah Valley included the raising of livestock, and the growing of various grains, hay, alfalfa, and hops. When the Northwestern Pacific Railroad was completed in 1889; prunes, potatoes, pears, and hops could be grown and sent to San Francisco and other regional markets. Wine grapes were planted, and irrigation was practiced on a small scale. Through the 1950's, hops, pears, prunes and grapes were the most widely planted crops in the Ukiah Valley. After the railroad was completed, lumber mills sprang up in the Ukiah Valley and became the major industry in Mendocino County as trains took redwood logs and processed boards south to the San Francisco region. Today, much of the active agricultural land is located on the valley floor and lower elevations along the Russian River system. Only a limited percentage of the valley's agricultural lands are currently protected under Williamson Act Agricultural Preserve contracts. According to the County of Mendocino's Public GIS system, there are no Williamson Act contracts within the Project site.

There are no zoning districts within the City limits for Agriculture or Timber Preserve. While there is an overlay for agriculture in the Zoning Ordinance, it is not applied over any parcel within the City limits. There are a small number of City parcels which have current agricultural use, such as existing vineyards. However, they are ongoing non-conforming uses within non-agricultural zoning districts. According to the California Department of Conservation Farmland Mapping & Monitoring Program, California Important Farmland Finder, the majority of lands within the City of Ukiah are identified as "Urban Built-Up Land".

Discussion: (a-e) No Impact. According to the California Department of Conservation Farmland Mapping & Monitoring Program, California Important Farmland Finder, the Project site does not contain Unique Farmland, or Farmland of Statewide Importance. The site is zoned Public Facilities, consistent with the Ukiah 2040 General Plan's Public land use designation, which allows for natural resource areas as a typical use. There are no agricultural uses or Williamson Act contracts on-site or in the immediate vicinity. The Project would not convert Farmland, conflict with existing zoning for agriculture or forest land, and would not involve changes to the environment that would result in the conversion of agricultural resources to non-agriculture uses. No impact would occur.

Mitigation Measures: None

3. Air Quality

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

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

emissions that create objectionable odors or otherwise adversely affect a substantial number of people.

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

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

The MCAQMD, which includes the City of Ukiah and surrounding areas, is designated as non-attainment for the State Standard for airborne particulate matter less than 10 microns in size (PM¹⁰). Particulate matter (PM) has significant documented health effects. The California Clean Air Act requires that any district that does not meet the PM¹⁰ standard make continuing progress to attain the standard at the earliest practicable date. The primary sources of PM¹⁰ are wood combustion emissions, fugitive dust from construction projects, automobile emissions and industry. Non-attainment of PM¹⁰ is most likely to occur during inversions in the winter. Regulation 1 of the MCAQMD contains regulations (known as "Rules") to regulate particulate matter; these Rules prohibit activities that would result in the injury, detriment, or annoyance of a considerable number of people, or which endanger the health and safety of the public.

The MCAQMD also provides the following significance thresholds for construction emissions:

1. 54 pounds per day of ROG ^[L_{SEP}](reactive organic gas)
2. 54 pounds per day of NOx ^[L_{SEP}](oxides of nitrogen as nitrogen dioxide)
3. 82 pounds per day of PM¹⁰ (particulate matter less than 10 microns in size)
4. 54 pounds per day of PM^{2.5} ^[L_{SEP}](airborne particulate matter with a diameter of 2.5 microns or less)
5. Best Management Practices for Fugitive Dust – PM¹⁰ and PM^{2.5}

Discussion: (a-d) Less than significant with mitigation. Typically, short-term construction related air quality impacts from emissions and dust result from large projects requiring a significant amount of grading or new construction, in addition to vehicle trips and operation of diesel equipment. Long-term air quality impacts are typically from land uses that produce a significant amount of emissions, or sources of dust or other airborne irritants.

As described in the Project Description, trail construction will be completed with the use of small excavators weighing less than one ton with blades and buckets less than 36 inches wide which will minimize the amount of dirt moved and the amount of vegetation being removed. Construction of the trail would not require a significant amount of construction trips, as equipment will be delivered and kept at the site through the construction period. All use of powered tools will be temporary and abide by all local regulations intended to address air quality impacts. Specifically, MCAQMD has a set of

standard Best Management Practices (BMPs) for projects involving new construction, the use of diesel engine equipment, and grading activities that would result in fugitive dust. While many of these regulations do not apply to this type of project, the Project will adhere to all applicable MCAQMD regulations. In addition, **Mitigation Measure AQ-1**, restricting the burning of removed vegetation, and **Mitigation Measure AQ-2** related to the use off-road equipment will be implemented, as appropriate.

The nearest uses that are considered “sensitive receptors” (includes schools, childcare facilities, health care facilities, senior facilities, and residences) are residences located on Helen Ave. and San Jacinto Ave, and Nokomis School approximately 1,000 feet east of the easternmost section of the proposed trail. However, due to the Project’s distance from these receptors, limited construction timeframe and implementation of the Mitigation Measures AQ-1 and AQ-2 below, the Project is not anticipated to impact sensitive receptors. In addition, the Project would not exceed the construction thresholds established by the MCAQMD, and air quality impacts associated with short-term construction would be **less than significant with mitigation**. Once completed, the trail will not result in long-term air quality impacts.

The MCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project’s individual emissions contribute to existing cumulatively significant adverse air quality impacts. The MCAQMD developed the operational thresholds of significance based on the level above which a project’s individual emissions would result in a cumulatively considerable contribution to the North Coast Air Basin’s existing air quality conditions. Therefore, a project that exceeds the MCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact. Because each individual construction project is required to be in attainment with the established MCAQMD thresholds, it is not likely that cumulative impacts would be significant.

Based on the aforementioned, air quality impacts would be **less than significant with mitigation**.

Mitigation Measures:

AQ-1: Vegetation Removal. Vegetation removal methods shall include chopping larger materials on-site to be disbursed with materials largely in contact with the ground; burning of vegetation shall not be allowed without obtaining the appropriate burn permits.

AQ-2: Diesel Engines – Stationary and Portable Equipment and Mobile Vehicles:

- a. Off-road equipment with auxiliary diesel engines rated at 50 brake horsepower or greater, must have either a valid Air Quality permit, or a state Portable Equipment Registration Program (PERP) Registration.

4. Biological Resources

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

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

Environmental Setting: Regionally, the Project area (Ukiah Western Hills) has historically been used primarily for recreation, timber harvest, homesite development, and undeveloped open space/wildlife habitat. The hills rise steeply from the valley floor and are predominated by eastern

facing slopes. A number of unclassified drainages create small sections of north-east and south-east facing slopes. The Project area is classified under three MCV2 classification systems: (1) *Quercus wislizeni*-*Quercus chrysolepis* (shrub) Shrubland Alliance, (2) *Arctostaphylos* (canescens, manzanita, stanfordiana) Shrubland Alliance, and (3) *Pinus sabiniana* Woodland.

A Biological Assessment was prepared for the Project by Jacobzsoon and Associates (August 21, 2024; **Attachment F**) and included a Biological (wildlife) Assessment and a Botanical Survey. The purpose of the assessment was to identify sensitive communities within the Study Area. The Biological Assessment is also designed to address the potential for cumulative impacts to biological resources that may occur as a result of the Project and to make recommendations to reduce or mitigate potential impacts. The Biological Assessment includes the analysis and comparison of existing habitat conditions within the Study Area with the documented range and habitat requirements of sensitive wildlife species described in the California Department of Fish and Wildlife's (CDFW's) California Wildlife Habitat Relationships System (CWHR) to determine if they would be directly or potentially impacted by the Proposed Project. As a part of the assessment field surveys were conducted on April 17th, April 18th, May 22nd, May 23rd, and July 18th.

Prior to conducting field surveys, available reference materials were reviewed, including the United States Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) Web Soil Survey, the USFWS NWI, the Ukiah 7.5-minute USGS quadrangle topographic maps, and the most recent available aerial imagery. The 100-year flood zone was assessed using the Federal Emergency Management Agency's (FEMA) NFHL. The location of streams and watercourses within the project vicinity were reviewed using datasets from California Streams and the California Department of Forestry and Fire Protection (CAL FIRE). The potential for occurrences of rare, threatened, endangered or plant and animal species of concern within or near the Study Area were evaluated by reviewing the Ukiah, Orr Springs, and Elledge Peak, Laughlin Range, Redwood Valley, Potter Valley, Cow Mountain, Boonville, and Purdy's Gardens 7.5 minute quadrangles topographic maps, aerial photography, California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants (online edition, v9.5), CDFW's Natural Diversity Database (CNDDB) Spotted Owl Data, CWHR, RareFind 5 and Quick Viewer Bios 6 processed and unprocessed data (online edition, v6.24.0604).

Discussion: (a) Less than significant impact with mitigation incorporated.

Wildlife and Watercourses. According to the biological assessment prepared for the Project, a total of 54 special-status wildlife species have been documented within the larger vicinity of the Project. Of the 54 special-status wildlife species within the vicinity of the Project, 22 special-status wildlife species have a moderate or high potential to occur within the Study Area based on habitat features present. These species include the following:

- Amphibians: red-bellied newt (*Taricha rivularis*);
- Birds: northern goshawk (*Accipiter gentilis*), golden eagle (*Aquila chrysaetos*), osprey (*Pandion haliaetus*), northern spotted owl (*Strix occidentalis caurina*);
- Insects: western bumble bee (*Bombus occidentalis*); and
- Mammals: Sonoma tree vole (*Arborimus pomo*), North American porcupine (*Erethizon dorsatum*), western red bat (*Lasiurus blossevillii*), hoary bat (*Lasiurus cinereus*), and fisher [West Coast DPS] (*Pekania pennanti*).

However, no special status wildlife species were observed within the Study Area during the Biological Assessment. The remaining thirty-two (32) special-status wildlife species documented within the vicinity of the Study Area are unlikely to occur or do not have the potential to occur due to lack of

required aquatic or vegetative habitat requirements, host plants, and/or lack of nesting habitat. While the project area contains one Class I and two Class III watercourses, the proposed trail alignments are sited hundreds of yards away from any designated watercourse and therefore will not impact riparian species.

Plants. Twenty-one special status species have been documented and determined to have a moderate to high potential to occur in the project area. No special status species were observed within the Study Area during the Biological Assessment. However, anecdotal reports of Redwood Lilies (*Lilium rubescens*) in the area may merit inclusion of mitigation measures. **BIO-1 Sensitive Amphibians, Mammals, Insects, and Plants; BIO-2: Nesting Birds;**

(b) Less than significant impact with mitigation. Sensitive natural communities include those that are listed in CNDDB as well as observed.

During the assessments conducted in April through July of 2024, the habitat was classified under three (3) MCV2 classification systems: (1) *Quercus wislizeni*-*Quercus chrysolepis* (shrub) Shrubland Alliance, (2) *Arctostaphylos* (*canescens*, *manzanita*, *stanfordiana*) Shrubland Alliance, and (3) *Pinus sabiniana* Woodland Alliance (Appendix D: Map 10, MCV2 Habitat Classifications). These communities are considered non-sensitive and thus require no special protection. Nevertheless, with Oak habitat loss and climate change stresses, should larger trees need to be removed, it may be advisable to incorporate mitigation measures.

(c) Less than significant impact with mitigation. Aquatic resources, communities, and habitats (e.g. watercourses, ponds, wetlands, vernal pools, etc.) are considered sensitive communities and are afforded special protections under CEQA and other Federal, State, and local laws, regulations, and ordinances. **BIO- 3: Carbon loss.**

Three (3) watercourses flow through the Study Area including Doolin Creek, a Class I watercourse, and two unnamed Class III watercourses. The Class I watercourse is classified by the United States Fish and Wildlife Service's (USFWS) National Wetland Inventory (NWI) (Appendix D: Map 7, National Wetlands Inventory) as a Riverine System which includes all wetland and deepwater habitats contained within a channel. The Study Area has a 100-Year Flood Zone hazard rating of moderate according to the FEMA National Flood Hazard Layer (NFHL) (Appendix D: Map 8, NFHL 100-Year Flood Zone). However, projected trail alignments do not cross or come near these drainages. Should unforeseen eventualities require a realignment of trails to within 50 feet of one of the designated watercourses, mitigation measure BIO-4 should be implemented. **BIO-4: Watercourses.**

(d) Less than significant impact. There are no established native resident or migratory wildlife corridors, or native wildlife nursery sites within the Project area. As noted above, there are fish bearing streams on-site. Impacts would be **less than significant**.

(e-f) Less than significant impact. There are no adopted Habitat Conservation Plans for the City of Ukiah, nor the larger Ukiah Valley that are applicable to the Project. Impacts would be **less than significant**.

Mitigation Measures:

BIO – 1 Sensitive Amphibians, Mammals, Insects, and Plants. A Worker Awareness and Education Program (WAEP) will be conducted with trail crew leaders to provide information regarding sensitive species most likely to occur, even though they were not seen in the Biological or Botanical Surveys. This program will be conducted by a qualified professional and include red-bellied newt (*Taricha rivularis*), Sonoma tree vole (*Arborimus pomo*), North American porcupine (*Erethizon dorsatum*), western red bat (*Lasiurus blossevillei*), hoary bat (*Lasiurus cinereus*), and fisher [West Coast DPS] (*Pekania pennanti*), western bumble bee (*Bombus occidentalis*), and Redwood Lily (*Lilium rebescens*). Education shall include monitoring for evidence of bat roosts (i.e. bat guano, ammonia odor, grease stained cavities) around trees or structures. Should evidence of these species be noted, it will trigger additional surveys conducted by a qualified biologist for activities that may affect the noted species.

BIO-2: Nesting Birds. No special status avian species were noted in the project area. However, Federal and State law protects all native birds. Pre-construction surveys shall be conducted by a qualified biologist prior to any vegetation removal or ground disturbing activities occurring between March 1 and August 31 of any year. All active bird nests shall not be removed, relocated, or otherwise disturbed for any purpose until all fledglings have left the nest

BIO-3: Roosting Bats. If evidence of bat roosts are observed (i.e. bat guano, ammonia odor, grease stained cavities) around trees, cavities, or structures proposed for removal, pre-construction bat surveys should be conducted no more than 14 days prior to groundbreaking activities. If bat roosts are identified, buffer or mitigation measures should be established by a qualified biologist.

BIO-4. Mammal Dens or Burrows. If evidence of special-status mammal borrows or denning activity is observed, it is recommended that pre-construction surveys be conducted by a qualified biologist for activities that may affect den sites.

BIO-5: Over-Wintering Monarchs. Monarch Butterflies “Over-Winter” in groups between November 1st and January 31st. If monarchs are observed in this time frame monarch surveys should be conducted by a qualified biologist no more than 14 days prior to the commencement of tree/shrub removal.

BIO- 6: Carbon Loss. Any tree greater than 6 inches dbh removed during construction shall be replaced at a ratio of 6 to 1 at the nearest available and appropriate site as approved by a qualified professional.

BIO-7: Watercourses. The Project shall adhere to UVTG Design and Maintenance Standards for trail construction related to erosion, and all earthwork within or adjacent to (50 feet) any watercourse or other body of water shall adhere to standard methods of erosion and sediment control (placement of straw, mulch, seeding, straw wattles, silt fencing, etc.) and, if possible, work shall be completed while the channel is dry to reduce sediment load downstream. Additionally, if any structures are proposed for placement within the bed or bank to allow for the trail crossing, consultation with CDFW shall be required and all necessary permits shall be obtained.

5. Cultural Resources

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

Significance Criteria: The proposed Project would significantly impact cultural resources if the significance of a historical or archaeological resource were substantially changed, or if human remains were disturbed.

Under CEQA, cultural resources must be evaluated to determine their eligibility for listing in the California Register of Historic Resources (CRHR). If a cultural resource is determined ineligible for listing on the CRHR the resource is released from management responsibilities and a project can proceed without further cultural resource considerations.

As set forth in Section 5024.1(c) of the Public Resources Code for a cultural resource to be deemed “important” under CEQA and thus eligible for listing on the California Register of Historic Resources (CRHR), it must meet at least one of the following criteria:

- 1) Is associated with events that have made a significant contribution to the broad patterns of California History and cultural heritage; or
- 2) Is associated with the lives of persons important to our past; or
- 3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possess high artistic value; or
- 4) Has yielded or is likely to yield, information important to prehistory or history.

Archaeological resources are commonly evaluated with regard to Criteria 4 (research potential). Historic-era structures older than 50 years are most commonly evaluated in reference to Criteria 1 (important events), Criteria 2 (important persons) or Criteria 3 (architectural value). To be considered eligible under these criteria the property must retain sufficient integrity to convey its important qualities. Integrity is judged in relation to seven aspects including: location, design, setting, materials, workmanship, feeling, and association.

Guidelines for the implementation of CEQA define procedures, types of activities, persons, and public agencies required to comply with CEQA. Section 15064.5(b) prescribes that project effects that would “cause a substantial adverse change in the significance of an historical resource” are significant effects on the environment. Substantial adverse changes include both physical changes to the historical resource, or to its immediate surroundings.

Public Resources Code Section 21083.2 also defines “unique archaeological resources” as “any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely

adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

This definition is equally applicable to recognizing "a unique paleontological resource or site." CEQA Section 15064.5 (a)(3)(D), which indicates "generally, a resource shall be considered historically significant if it has yielded, or may be likely to yield, information important in prehistory or history," provides additional guidance.

Assembly Bill 52 (effective July 1, 2015) mandates that before preparing a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency must seek consultation with tribes associated with the project's location. Tribes must have previously submitted a written request to the lead agency to be consulted on projects within their geographic areas of interest. The Guidiville Rancheria of California is the only tribe that has made such a request. In compliance with AB 52, a notification was sent to the Guidiville Rancheria of California on June 17, 2025, offering the opportunity for consultation. No response has been received to date. Should a response or consultation request be received within the AB 52 response window, the environmental review will be updated accordingly.

Environmental Setting: The Ukiah Township lies in a valley of the Russian River, bounded on the north by Calpella Township, on the east by Lake County, on the south by Sanel Township, and on the west by Anderson Township. The City of Ukiah was first settled in 1856 by Samuel Lowry. Initially incorporated into Sonoma County, an independent Mendocino County government was established in 1859 with Ukiah as the chosen county seat. Logging, cattle, and agricultural ventures contributed to the early settlement and growth of Ukiah throughout the remainder of the 19th century and early 20th century. 1889 is the date recorded for the first arrival of the train to Ukiah, quickly resulting in increased settlement of the City and its environs. The City of Ukiah is within the territory of the Northern Pomo. Permanent villages were often established in areas with access to staple foods, often times along eco-tones (transitions between varying environments), with access to good water, and generally flat land

The late 19th century saw slow growth in the community, with a slight decline after the turn of the century. The 1906 earthquake damaged a number of Ukiah buildings, particularly in the commercial core, and considerable re-building and remodeling activity occurred after that time. The City appears to have prospered in the following years, through the early 1920's. The City contains a number of Colonial Revival and Craftsman style derivations, popular during this era, that reflect the community's prosperity. An Historical and Architectural Survey Update was last prepared for the City by P.S. Preservation Services in 1999. The survey identified 23 properties with historic importance within the City limits. City Ordinance No. 838 was passed by the City in 1983, requiring that prior to the demolition of any building over 50 years old, the approval of the City Council must be obtained. The ordinance is a positive preservation tool, allowing some review and public input opportunity regarding the potential loss of historically significant buildings.

Discussion: (a) No impact. No historical or archaeologically significant sites as defined in §15064.5 have been documented in the project area. On June 17, 2025, the City requested a records search at the Northwest Information Center (NWIC) located on the campus of Sonoma State University. The NWIC, an affiliate of the State of California Office of Historic Preservation, is the official state repository of cultural, archaeological, and historical records and reports for an 18-county area that includes Mendocino County. The records search included a review of all study reports on file within the Western Hills Watershed Protection area. A review of historic registers and inventories indicates that no historical landmarks or points of interest are present in the Project area. Additionally, no National Register listed or eligible properties are located within the Project area. An Archaeological Survey Report (ASR), prepared by Alta Archaeological Consulting (Alta) in March 2021, covering a portion of the Project area, also found no cultural resources (report omitted for confidentiality). Therefore, the Project area would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.. **No impact.**

Discussion: (b) Less than significant impact. The NWIC records search and the Alta ASR also included a search of cultural resources included within the WHWPA. The NWIC records search indicated that two cultural resources studies had been completed on portions of the site, identifying no cultural resources within the Project area. The Alta ASR similarly found no on-site cultural resources.

As noted in the City’s General Plan Historic and Archeological Resources Element (1995), the Project site is not identified as an area of high cultural sensitivity; areas that are most typically culturally sensitive include those adjacent to streams, springs, and mid-slope benches above watercourses because Native Americans and settlers favored easy access to potable water. Because the Project has been designed with minimal ground disturbance and the site does not have a high potential for cultural resources to occur, less than significant impacts would occur as a result of the Project. Additionally, construction of the Project will be required to adhere to CEQA Guidelines Section 15064.5 (e-f) which specifically addresses what to do in the event that human remains or archeological resources are accidentally discovered.

As noted above, in accordance with AB 52, a notification was sent to the Guidiville Rancheria of California on June 17, 2025, offering the opportunity for consultation. No response has been received to date. Should a response or consultation request be received within the AB 52 response window, the environmental review will be updated accordingly. Therefore, impacts to cultural and archaeological resources are anticipated to be **less than significant**.

Mitigation Measures: None

6. Energy

| ENERGY. Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------|---------------------------------------|------------------------------|-------------------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| ENERGY. Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------|---------------------------------------|------------------------------|-------------------------------------|
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

Environmental Setting: Senate Bill 100 (SB 100, De León, Chapter 312, Statutes of 2018), the state's landmark policy requiring that renewable and zero-carbon energy resources supply 100 percent of electric retail sales to customers by 2045. The bill was signed into law in 2018 and calls for these resources to replace fossil fuels for generating electricity in the state. According to the California Air Resources Board (CARB), California has already made significant progress toward a clean energy future. Due to many efforts that promote renewable energy, energy efficiency and the storage technologies needed to retire fossil fuel resources, the state's electricity mix is already more than 60 percent carbon free. Approximately 36 percent of that comes from renewable sources, predominantly wind and solar. Specific to construction projects, CARB and the Environmental Protection Agency (EPA) standards regulate energy consumption through Green Building Standards to ensure construction does not result in wasteful, inefficient or unnecessary consumption of energy resources.

Discussion: (a-b) Less than significant impact. Fossil fuels for construction vehicles and other energy-consuming equipment would be used during vegetation removal and trail construction. However, fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. Project construction equipment would also be required to comply with the latest CARB and EPA engine emissions standards which require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Once constructed, the trail would not consume any sources of energy. With adherence to the aforementioned regulations, impacts from the Proposed Project related to energy consumption would be **less than significant**.

Mitigation Measures: None

7. Geology and Soils

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

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

Environmental Setting: The Ukiah Valley is part of an active seismic region that contains the Mayacama Fault, which traverses the valley in a generally northwest-southeast direction east of the

Project area. Based on California Geological Survey maps and the Background Report for the County of Mendocino General Plan Update (prepared by P.M.C., 2003), lands within the Western Hills are identified as being located on a somewhat unstable geologic formation but are not located within the Alquist Priolo Fault Zone, or in a landslide or liquefaction zone. In addition, according to the U.S. Geological Survey (USGS) Interactive Fault Map, there are no faults identified within the Project area.

The Project area is located at approximately 1,000-1,400 feet in elevation and is situated within the Coast Range geologic province. The North Coast Range is comprised of a geologic feature unique to California, the Franciscan Formation, which dictates the vegetative communities. The Franciscan Formation is comprised of serpentine, sandstone, and other sedimentary rocks. The soils within the Project site are characterized as both Hopland, which consists of very deep, well drained soils formed in colluvium and residuum weathered from sandstone or shale on steep hills and slopes (50 to 75 percent), and Maymen soils that are shallow, somewhat excessively drained soils that formed in residuum weathered from shale, schist, greenstone, sandstone and conglomerate. These soils have a shallow depth to bedrock.

Discussion: (a, c & d) No Impact. As noted above, the Project site does not contain earthquake faults. The site does not contain expansive or unstable soils and is not susceptible to landslides, nor strong seismic ground shaking. Lastly, the Project has been designed with minimal ground disturbance. Impacts to geology and soils related to these issues would be **less than significant**.

(b) Less than significant impact. Development and use of the proposed trail, if not carefully performed, has the potential to cause erosion. Trail grades are typically 7-8 percent, with some switchback grades along the steeper sections of hillside with slopes of 12 percent for very short sections of the trail. The UVTG Design and Maintenance Standards (**Attachment D**) provide guidance for the construction of trails in the Ukiah Valley to reduce erosion. These standards include, but are not limited to, the following:

- Construction of trails that are three feet wide, or less if physical constraints are present, to reduce the disturbance footprint;
- Trails should be built with the contour of the topography ($\pm 10\%$) to allow for sheet flow drainage and minimize concentrated runoff;
- Average trail grade of less than 10%, with short sections over 10% and followed by a relatively flat section or grade reversal;
- Grade of the trail should not be greater than half the grade of the side slope the trail traverses to prevent erosion caused by water flowing down the trail rather than down the hillside;
- Maximum trail grades of less than 15% wherever possible to reduce the potential for erosion and user damage;
- Incorporation of grade reversals every 10 to 50 feet to provide areas for water to drain off trails;
- Outer edges of trails should be built and maintained to allow either a 3-5% outslope or frequent drainage lenses to create sheet flow; and
- Build in a backslope where the area uphill of the trail is sloped upward from the trail to prevent a waterfall effect that creates concentrated flow on the trail.

Trail construction is anticipated to take approximately two weeks and will be scheduled during optimal weather and soil moisture conditions in order to reduce the duration that soils are exposed to water-borne erosion.

For the above reasons, impacts to geology from the loss of topsoil or erosion would be **less than significant**.

(e) No impact. No septic tanks or other waste water disposal systems are proposed. **No impact.**

(f) Less than significant impact. The geology of the Western Hills area is of the Franciscan Complex that dates to the Jurassic Period, approximately 199.6 to 145.5 million years ago. The Franciscan complex consists of arkosic sandstone interbedded within shale. Arkose is a coarse and well sorted quartz with a fine-grained matrix. Additionally, the Franciscan Complex can include rocks such as chert, serpentinite, basalt, and greenstone. The Franciscan complex, widespread in coastal California, has produced only small collections of significant fossils. Additionally, construction of the trail would only disturb the first few feet of soil where fossils are generally not known to be found. Therefore, the Project would not destroy unique paleontological resources or site or unique geologic features. Impacts would be **less than significant**.

Mitigation Measures: None

8. Greenhouse Gas Emissions

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

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

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

Carbon dioxide (CO₂) is the most important anthropogenic GHG because it comprises the majority of total GHG emissions emitted per year and it is very long-lived in the atmosphere. Typically, when evaluating GHG emissions they are expressed as carbon dioxide equivalents, or CO₂e, which is a means of weighting the global warming potential (GWP) of the different gases relative to the global

warming effect of CO₂, which has a GWP value of one. In the United States, CO₂ emissions account for about 85 percent of the CO₂e emissions, followed by methane at about eight percent, and nitrous oxide at about five percent.

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

Discussion: (a-b) Less than significant impact. Although the Project will mostly use hand tools, trail construction activities requiring the use of occasional power tools could result in direct GHG emissions from construction equipment and vehicle trips. However, construction will be temporary (up to two weeks) and subject to EPA and CARB energy efficiency regulations, as well as regulations of the Mendocino County Air Quality Management District (MCAQMD) intended to reduce dust, air pollution, and emissions. Due to the Project’s location, the majority of trail users are expected to access the trailhead by both vehicle and alternate modes of travel (bicycle, on foot, etc.) which will increase vehicle trips to the site over current levels. While the actual number of trail users is not known, the use of the trail in no way impacts greenhouse gasses. As discussed in Section 17, Transportation, the Project would not result in a significant number of traffic trips or vehicle miles traveled. Therefore, impacts would be **less than significant**.

Mitigation Measures: None

9. Hazards and Hazardous Materials

| HAZARDS AND HAZARDOUS MATERIALS. Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------|---------------------------------------|-------------------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| HAZARDS AND HAZARDOUS MATERIALS. Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact |
|---|--------------------------------|---------------------------------------|-------------------------------------|-------------------------------------|
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

Environmental Setting: Mendocino County has adopted numerous plans related to hazard management and mitigation including, but not limited to: Community Wildfire Protection Plan, Hazardous Waste Management Plan, Operational Area Emergency Plan, etc. The most recent plan, the Mendocino County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) was adopted by the County in December, 2020. The MJHMP provides an explanation of prevalent hazards within the County, identifies risks to vulnerable assets, both people and property, and provides a mitigation strategy to achieve the greatest risk reduction based upon available resources. The four cities within Mendocino County, including the City of Ukiah, participated in preparation of the MJHMP to individually assess hazards, explore hazard vulnerability, develop mitigation strategies, and create their own plan for each respective city (referred to as a “jurisdictional annex” to the MJHMP). The City of Ukiah adopted its jurisdictional annex chapter of the MJHMP on November 18, 2020. Hazards identified for the City of Ukiah include earthquakes, wildfire, dam failure, flood and pandemic. Table 1-13 of the City’s jurisdictional annex lists each hazard and mitigation action for City of Ukiah. Mitigation number ma-WF-UK-60 from the plan describes the need to implement a fuel modification program. The inclusion of Fire Hardened trails in the construction plan helps realize this goal.

The Ukiah Municipal Airport is located within the City of Ukiah jurisdictional limits. The Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP) was adopted by the Mendocino County Airport Land

Use Commission on May 20, 2021 and adopted by the Ukiah City Council on June 16, 2021. The UKIALUCP identifies areas (known as “compatibility zones”) with potential hazards and impacts to persons using or working within the vicinity of the airport.

The site does not include any known hazardous waste sites, as mapped by the State Water Resources Control Board (SWRCB) or the California Department of Toxic Substances Control (DTSC) on the GeoTracker and EnviroStor databases, respectively, nor are there any listed sites within the vicinity of the site.

All lands within the City of Ukiah are within the jurisdiction of the Ukiah Valley Fire Authority. None of the lands within the City of Ukiah are located within a California Department of Forestry (CalFire) State Responsibility Area (SRA). However, some parcels within the western boundary of the City limits, including the Project site, are designated as “Very High” fire severity within the Local Responsibility Area (LRA).

Discussion: (a-b) Less than significant impact. Construction activities limited to the use of powered equipment, as needed, may include the routine transport, use, storage, and disposal of small quantities of common hazardous materials, such as gasoline, diesel fuel, hydraulic fluids, and oils. However, the types and quantities of materials to be used are not expected to pose a significant risk to the public and/or environment and would be managed in accordance with federal, state, and local regulations. Impacts would be **less than significant**.

(c) Less than significant impact. Ukiah High School and Pomolita Middle School are located more than one-half mile away from the proposed trail alignment and as noted above, the use of hazardous materials for construction would be in accordance with all applicable regulations; impacts would be **less than significant**.

(d) No impact. As previously noted, under Government Code Section 65962.5, both the State Water Resources Control Board and the California Department of Toxic Substances Control are required to maintain databases of sites known to have hazardous substances present in the environment. Both agencies maintain such databases on their websites, known as GeoTracker and EnviroStor. According to these databases, the Project site(s) do not contain any listed hazardous sites; **no impact** would occur.

(e) Less than significant impact. The Project parcel is located approximately 1.86 miles northwest of the Ukiah Municipal Airport within the Other Airport Environs (OAE) Compatibility Zone of the UKIALUCP, which is identified as having a low risk level associated with airport operations. Occasional overflights may be intrusive to some outdoor activities but the OAE zone does not contain any regulations regarding intensity of use or other standards specific to airport safety concerns that would be applicable to the Project. According to Table 3A of the UKIALUCP, most land-use categories, including recreation facilities, parks and open land areas are considered normally compatible in the OAE compatibility zone. Based on this information, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. Impacts would be **less than significant**.

(f) Less than significant impact. There are no components of the Project that would impair or interfere with emergency response or evacuation. The proposed trail would be accessed from an existing park and parking lot. There are no components of the Project that would impair implementation

of, or physically interfere with, the adopted MJHMP or other emergency response plan or evacuation plan. Impacts would be **less than significant**.

(g) Less than significant impact with mitigation incorporated. As previously noted, the Project site is designated as having a “Very High” fire severity within a Local Responsibility Area (LRA). However, the use of the Proposed trail would not substantially increase the risk of wildfire in the area. Temporary construction activities involving the occasional use of gasoline-powered tools and equipment could introduce new temporary sources of ignition that could increase fire risk. However, with implementation of Mitigation Measure HAZ-1, impacts would be reduced to less than significant. For the reasons stated, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. See Section V.20, Wildfire, for more information. Impacts would be **less than significant with mitigation incorporated**.

Mitigation Measures:

HAZ-1: Should portable gasoline-powered equipment be used on site, the following firesafe precautions shall be taken:

- a. Spark arresters are required on all portable gasoline-powered equipment.
- b. Equipment shall be maintained in good working condition, with exhaust systems and spark arresters in proper working order and free of carbon buildup.
- c. Fuel the equipment in a safe place where spills can be contained and a fire extinguisher is nearby. Use the recommended gas/oil mixture and do not top off. Use a funnel or spout for pouring. Wipe off any spills.
- d. Do not refuel running or hot equipment. Dispense fuel at least 10 feet from sources of ignition.
- e. Do not use equipment in areas of dry vegetation. Keep leaves and dry materials away from a hot muffler.
- f. No smoking or open flame allowed near gasoline-powered equipment.

10. Hydrology and Water Quality

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

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

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

The Project area includes the Russian River Hydrologic Unit, Upper Russian River Hydrologic Area, Ukiah Hydrologic Subarea. The Russian River is on the State Water Resources Control Board's

(SWRCB) 303(d) list of impaired water bodies for water temperature and sedimentation/siltation. Sediment impairments in tributaries led to listing the entire Russian River Watershed for sediment. Surface water supplies for the Ukiah Valley include the Eel River, from which water is diverted into the Russian River watershed through the Potter Valley Project, Lake Mendocino, and the Russian River. Groundwater is drawn from the Ukiah Valley groundwater basin. The Ukiah Valley groundwater basin is the northernmost basin in the Russian River water system and underlies an area of approximately 60 square miles. Water enters the groundwater system via percolation of surface waters and through the soil. The creeks and streams in the Ukiah Valley provide drainage channels for groundwater recharge, as well as domestic and agricultural water supply. The City of Ukiah 2020 Urban Water Management Plan (UWMP) was adopted by City Council on June 2, 2021. The UWMP considers several growth scenarios including an additional 2,500 and 5,000 new hookup scenarios and determined that there is capacity through the 2045 planning horizon to serve these growth projections.

Discussion: (a-b & e) No impact. No groundwater would be used for construction or operation of the trail. No new facilities are proposed. The Project would not require water to be discharged and groundwater would not be impacted by the Project. **No impact.**

(ci-iii) Less than significant impact with mitigation. The project area contains one Class I and a variety of III watercourses. The proposed trail alignments are sited hundreds of yards away from the Class I watercourse. Trails will cross class III watercourses in a half dozen locations. Class III watercourses have no aquatic life present but show evidence of being capable of sediment transport to Class I and II waters under normal high-water flow. Trail construction in the vicinity of drainages will be completed during the dry season and comply with the UVTG Design and Maintenance Standards. Small bridges will be placed to cross the Class III drainages with the footings outside the bank and with no part of the structure in the bed.

As noted in **Mitigation Measure BIO-7**, standard methods of erosion and sediment control will be implemented to reduce potential sediment loads below the work near any Class III or seasonal drainage. Lastly, trail construction near the drainage will be scheduled during optimal weather and soil moisture conditions in order to reduce the duration that soils are exposed to water-borne erosion.

Impacts associated with erosion and water quality would be **less than significant with mitigation.**

(d) No impact. The Project is not located within a tsunami hazard zone, nor a flood zone, as identified by the Federal Emergency Management Agency. **No impact** would occur.

Mitigation Measures:

Implementation of **BIO-7**

11. Land Use and Planning

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

| | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

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

Environmental Setting: The City of Ukiah includes approximately 4.72 square miles. It serves as the County Seat of Mendocino County, as well as the county’s commercial hub. Predominant land uses in the City include single-family residential, multi-family residential, and commercial uses ranging from local commercial to service commercial, as well manufacturing, industrial and public facilities.

The City of Ukiah is governed by the City’s 2040 General Plan adopted on December 7,2022. More specifically, zoning and land use are governed by the City’s Zoning Ordinance, as outlined in Division 9, Chapter 2 of the Ukiah City Code. The purpose of the Ukiah Zoning Code is to promote the growth of the City in an orderly manner and to promote and protect the public health, safety, peace, comfort and general welfare. The larger Ukiah Valley is governed by the Ukiah Valley Area Plan (UVAP; 2011), which is a comprehensive and long range inter-jurisdictional planning document that represents the vision and foresight of the people who live and work in the Ukiah Valley. This plan governs land use and development on the unincorporated lands in the Ukiah Valley. Further, the Western Hills Watershed Protection Area Master Plan (adopted February 2024) guides the use of the project area and site.

Discussion: (a) Less than significant impact. Physical division of an existing community would typically be associated with construction of a new highway, railroad, park or other linear feature being constructed in a manner that would bifurcate an established neighborhood or community. Although the project would be near existing homes, it will not be in between homes. Future development may lead to the trail being between homes, but an existing easement across the effected parcel predates the homes being built so therefore the project would not result in the division of an established community. Impacts would be **less than significant**.

(b) Less than significant. The approximate 760 acre project site lies within the City owned Western Hills Watershed protection area with one short section of trail crossing a private property parcel via an existing trail easement. The Project site is zoned Public Facilities and carries a 2040 General Plan Land Use designation of Public Facility. Objective 13 of the Western Hills Watershed Protection Area Master Plan commits the City to “Provide Safe Public Access for Citizen Science, Education, Volunteer Management, and Recreation.”

The proposed trail would not be detrimental to surrounding residences, nor would it prohibit the potential development of residences in the area. Accordingly, it was determined that in this case, the public hiking trail is an “allowed” use and does not require discretionary review. The project supports 2040 General Plan Goals in elements A1 Land Use, A4 Public Facilities, and A5 Environment and Sustainability.

LU-6.3 Open Space Access. The City shall encourage new hillside developments to provide public access (as appropriate) to adjacent greenways, open space corridors, trails, and parks if development is proposed adjacent to such facilities.

PFS-12 To provide parks, recreational facilities, and trails for residents and visitors.

PFS-12.1 Connected Park System. The City shall provide an interconnected park system that creates an urban greenbelt and links all trail systems within the City.

PFS-12.3 Equitable Access to Parks and Recreation Facilities . The City shall establish new parks and recreation facilities to ensure all residents have access within a one-mile radius of their place of residence regardless of socioeconomic status.

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

Based on the aforementioned, the Project is consistent with all applicable land use plans and regulations; the Project would not result in 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. Impacts would be **less than significant**.

Mitigation Measures: None

12. Mineral Resources

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

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

Environmental Setting: The most predominant of the minerals found in Mendocino County are aggregate resource minerals, primarily sand and gravel, found along many rivers and streams. The Ford Gravel Bars are located in Ukiah, along the Russian River.

Discussion: (a-b) No impact. There are no identified mineral resources within the Project area. No impact would occur.

Mitigation Measures: None

13. Noise

| NOISE. Would the project result in: | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact |
|--|--------------------------------|---------------------------------------|-------------------------------------|--------------------------|
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Generation of excessive ground borne vibration or ground borne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Environmental Setting: The Ukiah City Code does not contain thresholds for analyzing noise impacts from construction-related noise but guidance documents from the Federal Highway Administration and the Federal Highway Administration provide information on maximum noise and vibration levels associated with construction equipment and thresholds of significance for analyzing such impacts.

Although the Ukiah City Code does not contain thresholds of significance for analyzing construction-related noise, UCC §6054, *Construction of Buildings and Projects*, states that it shall be unlawful for any person within a residential zone, or within a radius of five hundred feet (500') therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures or projects or to operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist or any other construction type device (between the hours of 7:00 p.m. of one day and 7:00 a.m. of the next day) in such a manner that a reasonable person of normal sensitiveness residing in the area is caused discomfort or annoyance unless beforehand a permit therefor has been duly obtained from the Director of Public works.

The UCC's Noise Ordinance (Division 7, Chapter 1, Article 6) establishes ambient base noise level standards that apply to specific zoning districts within the City of Ukiah. These are specific to operation (not construction). "Ambient noise" is the all-encompassing noise associated with a given environment, being usually a composite of sounds from many sources near and far. For the purpose of the Noise Ordinance, ambient noise level is the level obtained when the noise level is averaged

over a period of fifteen (15) minutes without inclusion of noise from isolated identifiable sources, at the location and time of day near that at which a comparison is to be made. Land uses exceeding these standards for long periods of time are considered to be significant.

Discussion: (a) Less than significant impact. Construction activities are generally temporary, resulting in periodic increases in the ambient noise environment and generally occur when construction activities occur in areas immediately adjoining noise-sensitive land uses, during noise-sensitive times of the day, or when construction activity occurs at the same precise location over an extended period of time (e.g., pile driving in one location for 8-10 hours in a day, or over a duration of several successive days). Certain land uses are particularly sensitive to noise, including schools, hospitals, rest homes, long-term medical and mental care facilities. Residential areas are also considered noise sensitive, particularly during the nighttime hours.

The nearest sensitive receptors are residences located on Helen Avenue, Doolin Canyon Dr, and San Jacinta Dr. Additionally Nokomis Elementary School is located approximately 750 feet from the proposed trailhead. According to the Federal Highway Administration's *Roadway Construction Noise Model User's Guide* (2006), maximum noise levels associated with these tools range from 73 to 89 decibels (dBA).

There are no quantitative standards for construction noise specified by either the Ukiah General Plan or the UCC. However, UCC Section 6054 restricts construction activities within a residential zone, or within a radius of 500 feet therefrom, to the hours of 7:00 a.m. and 7:00 p.m. Similarly, the Federal Transit Administration's *Transit Noise and Vibration Impact Assessment Manual* (2018) identifies a daytime noise level of over 90 dBA for extended periods of time as a noise level where adverse community reaction could occur at residential land uses within 500 feet of the noise. While Nokomis Elementary School is 750 feet from the trailhead, over 80% of the total trail alignments are greater than a half mile from the closest residence and the school. Lastly, Project construction will occur between the hours of 7:00 a.m. to 7:00 p.m., in accordance with the City's Noise Ordinance. As such, noise impacts associated with the Project would be **less than significant**.

(b) Less than significant impact. Project construction can generate varying degrees of ground borne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Similar to the discussion in the noise analysis in criteria (a) above, the City does not contain specific standards or thresholds related to groundborne vibration. However, the Federal Transit Administration's *Transit Noise and Vibration Impact Assessment Manual* identifies 0.2 inches per second peak particle velocity (in/sec PPV) as the level at which potential damage could result to non-engineered timber and masonry buildings.¹ Additionally, Caltrans identifies 0.24 in/sec PPV as the level at which vibration is distinctly perceivable to humans. Based on ground-borne vibration levels for standard types of construction equipment provided by the FTA, of the equipment proposed to be used for Project construction, the use of a vibratory roller/compactor

¹ Peak Particle Velocity is the peak signal value of an oscillating vibration velocity waveform. Usually expressed in inches/second in the United States.

(such as a “vibraplate”) would be expected to generate the highest vibration levels (typically 0.210 in/sec PPV at a distance of 25 feet). Due to the Project’s proximity to the nearest residence (approximately 1,200 ft) and the fact that the operation of this equipment (with vibration levels below the aforementioned thresholds) along the trail alignment would not be constant throughout the day, the Project would not result in significant groundborne vibration, and impacts would be **less than significant**.

(c) Less than significant impact. The Project parcel is located approximately 1.86 miles northwest of the Ukiah Municipal Airport within the Other Airport Environs (OAE) Compatibility Zone of the UKIACLUP, which is identified as having a low risk level associated with airport operations. Occasional overflights may be intrusive to some outdoor activities but the OAE zone does not contain any regulations regarding intensity of use or other standards specific to airport safety concerns that would be applicable to the Project. According to Table 3A of the UKIALUCP, most land-use categories, including recreation facilities, parks and open land areas are considered normally compatible in the OAE compatibility zone. Based on this information, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. Impacts would be **less than significant**.

Mitigation Measures: None

14. Population and Housing

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

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

Environmental Setting: The City of Ukiah comprises of approximately 4.72 square miles within Mendocino County. Overall, the City of Ukiah’s population has increased moderately over the past nearly 30 years, with a more accelerated increase in the last four years. Projections from the California State University Chico Center for Economic Development- Mendocino County Economic/Demographic Profile show this trend continuing. As described in the City’s Housing Element (2019) of the General Plan, the City’s annual growth rate between 1990 and 2018 averaged approximately 0.3%. Between 2000 and 2010, the City added 545 residents, or 3.7%, to its population.

According to the California Department of Finance, the population in the County of Mendocino was 59,985 in 2018 and 16,226 in the City of Ukiah. The newly released 2020 Census data identifies the City of Ukiah population as 16,607.

Discussion: (a-b) No Impact. The Project would not involve the construction of new homes or businesses, or the extension of roads that would induce population growth, nor would the Project displace any people or housing, as no residences are located on-site. **No impact.**

Mitigation Measures: None

15. Public Services

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

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

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

Discussion: (a) Less than significant impact. Like the existing City View Trail the proposed Upper City View Trail would connect to, the City of Ukiah Police Department and Ukiah Valley Fire Authority

will be responsible for emergency response in the Project area. The Project will not have a substantial effect on their ability to serve the area, nor would it result in the need for additional resources.

The Project would not affect the number of students served by local schools, nor would it increase the number of new residents to the area, which could require the construction of expanded school facilities.

Trail users would utilize the existing parking lot, restroom and water fountain facilities within Low Gap Park, and will therefore not require additional public utilities. The trail will be predominantly maintained by UVTG volunteers in order to minimize or avoid the use of City park staff.

As such, the Project would not result in 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. Impacts would be **less than significant**.

Mitigation Measures: None

6. Recreation

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

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

Environmental Setting: The City of Ukiah manages several recreation facilities, including more than 13 City parks. In addition, there are approximately 30 miles of trails located throughout the Ukiah Valley, under City, County, and federal jurisdiction.

Discussion: (a-b) Less than significant impact. Opening the Western Hills Watershed Protection Area to the public for recreational trail use will involve the development of additional recreational facilities in the City of Ukiah. Both existing and new trail users will be attracted to the site. While many users will walk or bike to the site, some will drive creating additional traffic and reduced on street

parking in the neighborhood. On the other hand, existing trail users are expected to divert some of their recreational time from other sites to this new trail system thereby offsetting the impact to this area by decreasing the impact on the other trail systems in surrounding neighborhoods.

The trailhead will be in a residential neighborhood off Helen Ave at the bottom of Doolin Canyon Drive. The neighborhood has no through traffic and reaches a dead end at the southern end of Helen Avenue. The limited number of homes in this isolated area results in very low baseline traffic volumes. Traffic impacts are discussed in section 17. "Transportation. "

On-street parking for residents on Helen Avenue will be decreased by the creation of a trailhead in the neighborhood. From the intersection at Washington Street to its terminus, Helen Avenue is over 1200 feet long with on-street parking on both sides of the street. This provides room for over 100 cars to be parked on existing on-street locations. On-street parking also extends further to the north on Helen Avenue and to the east on Washington Avenue providing additional parking. As a point of comparison, Low Gap Park is the closest available trailhead providing parking for trail users, skateboarders, tennis players, and other park users to the very popular park. The parking lot at Low Gap Park has room for about 50 cars and is rarely full. Similar to Low Gap Park, parking on Helen will serve multiple neighborhood activities including trail users, overflow parking for Nokomis Elementary School, families and sports teams using the fields at Nokomis Elementary School, and residential parking. The comparison with Low Gap Park, with half as many parking spots, suggests there is adequate on street parking for the new use in the area while acknowledging parking may be limited on weekends and during events at the Nokomis fields. However, equestrian use will not be permitted on the trails due to a lack of adequate parking and the increased expense of building and maintaining trails that will withstand the greater impact of horses and mules.

Impacts would be **less than significant**.

Mitigation Measures: None

17. Transportation

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

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

Traditionally, transportation impacts had been evaluated by using Level of Service (LOS) analysis to measure the level of congestion on local roadways. However, 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. This change was formally adopted into CEQA Guidelines effective July 1, 2020. VMT measures the additional miles traveled by vehicles as a result of a project. If a project causes substantial increase in VMT, it may result in a significant environmental impact.

In 2018, the Governor's Office of Land Use and Climate Innovation (LCI), formerly the Office of Planning and Research (OPR), published the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, offering nonbinding guidance to assist lead agencies in implementing VMT-based analysis. This advisory also identifies certain low-VMT generating project types that can be presumed to have a less than significant impact and provides screening thresholds that may be used to avoid the need for detailed modeling.

On behalf of the Mendocino Council of Governments (MCOG), Fehr & Peers prepared the *SB 743 Vehicle Miles Traveled Regional Baseline Study* (May, 2020). This study provides localized data and recommended VMT thresholds, and incorporates applicable goals and policies from transportation plan including:

- Ukiah Bicycle and Pedestrian Master Plan (2015)
- City of Ukiah Safe Routes to School Plan (2014)
- Mendocino County Rail Trail Plan (2012)

- Ukiah Downtown Streetscape Improvement Plan (2009)
- City of Ukiah 2040 General Plan (Mobility Element)
- MCOG's Regional Transportation Plan (2017)
- Section 5, Circulation and Transportation, of the Ukiah Valley Area Plan (2011)

Although the 2040 General Plan was adopted after the Baseline Study, its policies are aligned with VMT reduction strategies.

CEQA allows the lead agency to choose the most appropriate method for evaluating VMT. If an existing tool or model is unavailable for the project's location, the lead agency may apply a qualitative analysis in accordance with the CEQA Guidelines and LCI's advisory.

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

The gateway to the Project site will be located on Doolin Canyon Road immediately off Helen Ave, a City-maintained two-lane road that is developed with on-street parking, and a pedestrian sidewalk on the east side of the road. The Nearest MTA bus stop is located approximately 600 yards away at the corner of Dora and Washinton Ave.

Discussion: (a-b) Less than significant impact. As outlined above, transportation impacts are considered significant if the project conflicts with applicable circulation plans or causes a substantial increase in VMT under CEQA Guidelines §15064.3(b).

The project proposes construction of a non-motorized, Class trail, consistent with local and regional transportation and land use plans. LCI's 2018 *Technical Advisory* identifies trails and bicycle/pedestrian facilities as project types that generally do not result in significant VMT increases. Similarly, the MCOG Baseline Study provides screening criteria (Section 3.3) for exempting projects that are located in low-VMT areas, are low VMT-generating by type (e.g. trails), generate minimal new trips, and are consistent with a jurisdiction's General Plan or other regional plans. This trail project meets those criteria. It will generate few or no new vehicle trips, supports active transportation, and is consistent with both the City of Ukiah 2040 General Plan and MCOG's Regional Transportation Plan. While the VMTscreening tool developed for MCPG by Fehr & Peers does not currently include the project location, CEQA allows for qualitative VMT analysis when modeling is infeasible. Given the project's limited scale, recreational nature, and consistency with transportation goals, impacts related to circulation and VMT would be **less than significant**.

(c-d) Less than significant impact. The proposed trails would be accessed from two trailheads approximately 350 feet apart on Helen Avenue and Doolin Canyon Road and would not introduce new road or roadway modifications. Emergency access would continue to be provided through existing facilities, and the Project does not propose any changes that would impair access or emergency response capabilities. No geometric design features such as sharp curves, new intersections, or incompatible land uses are proposed. Therefore, the project would not create new safety hazards or result in inadequate emergency access. **Impacts would be less than significant.**

Mitigation Measures: None

18. Tribal Cultural Resources

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

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

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

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

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

Discussion: (a-b) Less than significant impact. As described in Section 5, Cultural Resources, of this Initial Study, no cultural resources were identified within the Project area as a result of the records search, literature review, or archaeological field surveys. In addition, due to its topography, the site is considered to have a “low potential” for cultural, archeological, and historic resources. Because the Project has been designed with minimal ground disturbance and the site does not have a high potential for resources to occur, less than significant impacts would occur as a result of the Project. Regardless, construction of the Project will be required to adhere to CEQA Guidelines Section 15064.5 (e-f) which specifically addresses what to do in the event that human remains or archeological resources are accidentally discovered.

As noted above, in accordance with AB 52, a notification was sent to the Guidiville Rancheria of California on June 17, 2025, offering the opportunity for consultation. To date, no response has been received. Should a response or consultation request be received within the AB 52 response window, the environmental review will be updated accordingly. Therefore, impacts to cultural and archaeological resources are anticipated to be **less than significant**.

Mitigation Measures: None

19. Utilities and Service Systems

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

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

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

Electric. The City of Ukiah's Electric Utility Department provides electric services to properties within the City limits, while Pacific Gas & Electric (PG&E) provides services to properties outside of the City.

Water. Water services in the City of Ukiah are provided by the Ukiah Valley Water Authority (UVWA), which is a Joint Powers Authority (JPA) formed between the City of Ukiah, Millview County Water District, Redwood Valley County Water District, Calpella County Water District, and Willow County Water District. The City of Ukiah 2020 Urban Water Management Plan (UWMP) was adopted by City Council on June 2, 2021. The UWMP considers several growth scenarios including an additional 2,500 and 5,000 hookup scenarios and determined that there is capacity through the 2045 planning horizon to serve these growth projections.

Sewer and Wastewater. The Ukiah Valley Sanitation District (UVSD) and the City of Ukiah provide public sewer services to customers within their boundaries under the purview of the State Water Quality Control Board. The City's sewage treatment plant and Waste Water Treatment Plant (WWTP), operational since 1958, serves the City of Ukiah and the Ukiah Valley Sanitation District, however the Project parcel is not located within the service area.

Solid Waste. The Ukiah landfill, outside City limits on Vichy Springs Road, stopped receiving municipal solid waste in 2001 and the City is working on capping the landfill. No new waste generated will be processed through the landfill. Solid waste generated in the Ukiah Valley is exported for disposal to the Potrero Hills Landfill in Solano County. The Valley's solid waste disposal system consists of a large volume transfer station, Ukiah Transfer Station, which receives waste for export.

Discussion: (a-e) No Impact. Users of the proposed trail would utilize existing infrastructure, including access roads, parking lots, water fountains and restrooms; no additional utilities are needed for the proposed trail. Any waste produced from construction activities would be disposed of at the Ukiah Transfer Station in accordance with all applicable local, state and federal regulations. **No impact** to utilities and service systems would occur.

Mitigation Measures: None

20. Wildfire

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

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

Environmental Setting: All lands within the City of Ukiah are within the jurisdiction of the Ukiah Valley Fire Authority. None of the lands within the City of Ukiah are located within a California Department of Forestry (CalFire) State Responsibility Area (SRA). However, some parcels within the western boundary of the City limits, including the Project site, are designated as “Very High” fire severity within the Local Responsibility Area (LRA).

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

Discussion: (a) Less than significant impact. The proposed trail would be accessed via existing streets. There are no components of the Project that would conflict with, or impair the adopted MJHMP, EOP, or other adopted emergency response plan or emergency evaluation plan. Additionally, after construction the UVTG will consult with the Ukiah Valley Fire Authority to assess trail segments that may be appropriate for “fire-hardening” (**Attachment E**). A Fire-Hardened Trail is a designated and managed corridor that combines both vegetation management and recreational trails. It is a corridor

where the preservation and enhancement of the forest plays a significant role in forest restoration and fuels reduction work and is integrated with the creation of trails for recreational use. Fire hardened trails are similar to shaded fuel breaks and serve as multi-functional spaces that cater to both environmental conservation and community well-being. They are designed to provide a harmonious blend of nature and recreation, promoting a healthier lifestyle while preserving and enhancing the natural environment. Impacts would be **less than significant**.

Discussion: (b & d) Less than significant with mitigation incorporated. As described in Section 9, Hazards and Hazardous Materials, the Project site is located within an area designated as having “Very High” fire severity risk within a Local Responsibility Area. However, the development and use of the proposed trail would not substantially increase the risk of wildfire in the area. Temporary construction activities involving the use of gasoline-powered tools and equipment could introduce new temporary sources of ignition that could increase fire risk. However, with implementation of Mitigation Measure HAZ-1, impacts would be reduced to less than significant. For the reasons stated, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. See Section 20, Wildfire, for more information. Impacts would be **less than significant with mitigation incorporated**.

(C) Less than significant impact. The Project would not require the installation or maintenance of infrastructure such as roads, fuel breaks, emergency water sources, power lines or other utilities that would exacerbate fire risk. Impacts would be **less than significant**.

Mitigation Measures:

Implementation of **HAZ-1**

21. Mandatory Findings of Significance

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

| | | | | |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

Discussion: (a) Less than significant impact with mitigation incorporated. As described throughout the Initial Study, temporary ground disturbing activities associated with vegetation removal and trail construction could result in direct significant impacts to Air Quality, Biological Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, and Wildfire. However, mitigation measures identified within the aforementioned sections would reduce impacts to **less than significant with mitigation incorporated.**

(b) Less than significant impact with mitigation incorporated. Cumulative impacts are generally considered in analyses of Air Quality, Biological Resources, Cultural Resources, Noise, and Traffic. As discussed throughout the Initial Study, the Proposed Project would have less than significant impacts on these resources with implementation of mitigation measures described herein. Short-term construction impacts associated with the Project would not significantly contribute to cumulative impacts in the area as there are no known past projects nor current projects within the vicinity of the site. Based on the findings and conclusions contained in the Initial Study, cumulative impacts related to the Proposed Project would be **less than significant with mitigation incorporated.**

(c) Less than significant impact with mitigation incorporated. Based on the findings and conclusions contained in the Initial Study, the Proposed Project would not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. Impacts would be **less than significant with mitigation incorporated.**

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VII. MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Monitoring and Documentation Sheet

| Potential Impact | Mitigation Measures | Implementation Responsibility | Monitoring Responsibility | Timing | Date Implemented |
|---|--|-------------------------------|---------------------------|--------|------------------|
| Air Quality | | | | | |
| AQ-1: Vegetation Removal. | Vegetation removal methods shall include chopping larger materials on-site to be disbursed with materials largely in contact with the ground; burning of vegetation shall not be allowed without obtaining the appropriate burn permits. | Contractor | COU | TC | |
| AQ-2: Diesel Engines – Stationary and Portable Equipment and Mobile Vehicles: | Off-road equipment with auxiliary diesel engines rated at 50 brake horsepower or greater, must have either a valid Air Quality permit, or a state Portable Equipment Registration Program (PERP) Registration. | Contractor | COU | TC | |
| Biology | | | | | |
| BIO-1: Sensitive Species | A Worker Awareness and Education Program (WAEP) will be conducted with trail crew leaders | COU | COU | PC | |
| BIO-2: Nesting Birds. | Pre-construction surveys shall be conducted by a qualified biologist prior to any vegetation removal or ground disturbing activities occurring between March 1 and August 31 of any year | Contractor | COU | PC | |
| BIO-3: Roosting Bats. | If evidence of bat roosts are observed pre-construction bat surveys should be conducted no more than 14 days prior to groundbreaking activities. | Contractor | COU | PC | |
| BIO-4: Mammal Dens or Burrows. | If evidence of special-status mammal borrows or denning activity is observed, it is recommended that pre-construction surveys be conducted by a qualified | Contractor | COU | PC | |

| | | | | | |
|---|---|------------|-----|----|--|
| | biologist for activities that may affect den sites | | | | |
| BIO-5: Over-Wintering Monarchs. | Monarch Butterflies "Over-Winter" in groups between November 1st and January 31st. If monarchs are observed in this time frame monarch surveys should be conducted by a qualified biologist no more than 14 days prior to the commencement of tree/shrub removal. | Contractor | COU | PC | |
| BIO- 6: Carbon Loss. | Any tree greater than 6 inches dbh removed during construction shall be replaced at a ratio of 6 to 1 at the nearest available and appropriate site as approved by a qualified professional. | Contractor | COU | BC | |
| BIO-7: Watercourse s | The Project shall adhere to UVTG Design and Maintenance Standards | Contractor | COU | TC | |
| Hazards and Hazardous Materials | | | | | |
| HAZ-1 | Should portable gasoline-powered equipment be used on site firesafe precautions a-f shall be taken | Contractor | COU | TC | |
| Hydrology and Water Quality | | | | | |
| BIO-7 | The Project shall adhere to UVTG Design and Maintenance Standards | Contractor | COU | TC | |
| Wildfire | | | | | |
| HAZ-1 | Should portable gasoline-powered equipment be used on site firesafe precautions a-f shall be taken | Contractor | COU | TC | |

*Mitigation measures are abbreviated for this documentation sheet. Implementation and monitoring must comply with all aspects of the measure as outlined in the ISMND.

* COU = City of Ukiah

* TC = Throughout Construction

* PC = Prior to Construction

* BC = Before Completion

VIII. ATTACHMENTS

- A. Existing Conditions Photographs
- B. Final Recorded Map and Deed (LLA25-000003)
- C. City of Ukiah Native Plant Palette
- D. Ukiah Valley Trail Group Philosophy and Design and Maintenance Standards
- E. Fire- Hardened Trails (Vegetation Management Corridors)
- F. Biological Assessment Report
- G. Concept Trail Map