PUBLIC DRAFT

INITIAL STUDY AND NEGATIVE DECLARATION

SCH: XXXXXX

FOR

RUSTIC RETIREMENT, LLC GENERAL PLAN AMENDMENT & REZONE AT 1961 VICHY SPRINGS ROAD, UKIAH APNS: 178-220-09, 181-240-01

File No. GP_2023-0002 / R_2023-0002

LEAD AGENCY:
County of Mendocino
Department of Planning & Building Services
860 North Bush Street, Ukiah, CA 95482
(707) 234-6650

PREPARED BY:
Russ Ford, Senior Planner
Department of Planning & Building Services
860 North Bush Street, Ukiah, CA 95482
(707) 234-6650

SEPTEMBER 22ND, 2025

TABLE OF CONTENTS

INTRODUCTION **1**

PROJECT INFORMATION **1**

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED **7**

DETERMINATION **7**

ENVIRONMENTAL CHECKLIST **8**

5.1 Aesthetics 8
5.2 Agriculture And Forestry Resources 9
5.3 Air Quality 10
5.4 Biological Resources 12
5.5 Cultural Resources 14
5.6 Energy 15
5.7 Geology And Soils 16
5.8 Greenhouse Gas Emissions 18
5.9 Hazards And Hazardous Materials 18
5.10 Hydrology And Water Quality 20
5.11 Land Use And Planning 22
5.12 Mineral Resources 24
5.13 Noise 25
5.14 Population And Housing 26
5.15 Public Services 27
5.16 Recreation 27
5.17 Transportation 28
5.18 Tribal Cultural Resources 29
5.19 Utilities And Service Systems 31
5.20 Wildfire 32
5.21 Mandatory Findings Of Significance 34

FIGURES AND TABLES

FIGURE 1: Location Map 4

FIGURE 2: Aerial Imagery 5

FIGURE 3: Plot Plan 6

TABLE 1: Adjacent Land Use And Zoning ..... **Error! Bookmark not defined.**

INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code §21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, §15000 et seq.), this Draft Initial Study (IS) has been prepared as documentation for a proposed general plan amendment and rezone of a 160± acre parcel at 1961 Vichy Springs Road, Ukiah. APNs 178-220-09, 181-240-01 (Project). This Draft IS/ND includes a description of the Project; the location of the Project site; an evaluation of the potential environmental impacts of Project implementation and statement that an Environment Impact Report (EIR) is not required because the project will not have a significant adverse impact on the environment.

Pursuant to Section 15367 of the State CEQA Guidelines, the County of Mendocino is the Lead Agency for the Project. As the Lead Agency, The County of Mendocino has the principal responsibility for carrying out the project and has the authority to approve the Project and its accompanying environmental documentation. In addition to addressing the potential environmental impacts that would result from the Project, this Draft IS/ND serves as the primary environmental document for future activities associated with the Project, including discretionary approvals requested or required for Project implementation.

Questions in the Initial Study Checklist are provided with their respective answers based on analysis undertaken. An explanation for all checklist responses is included, and all answers take account of the whole action involved, including off-site as well as on-site; cumulative as well as project level; indirect as well as direct; and construction as well as operational impacts. The explanation of each issue identifies (a) the significance criteria or threshold, if any, used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance. In the checklist the following definitions are used:

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

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

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

"**No Impact"** means that the effect does not apply to the Project, or clearly will not impact nor be impacted by the Project.

PROJECT INFORMATION

FILE NUMBER:	GP_2023-0002 / R_2023-0002
OWNER/APPLICANT:	Jared & Bonnie Carter 1961 Vichy Springs Road Ukiah, CA 95482
PROJECT LOCATION:	1.7± miles east of Ukiah on the south side of Vichy Springs Road (CR 215) 0.53± miles east of its intersection with Redemeyer Road (CR 215-A) at 1961 Vichy Springs Road, Ukiah. APNs 178-220-09 and 181-240-01.
TOTAL ACREAGE:	160.5± Acres
GENERAL PLAN:	Range Lands (RL)
ZONING:	Rangeland (R-L)

PROJECT DESCRIPTION: Pursuant to CEQA Guidelines Section 15125, the Project Description is required to identify the existing baseline physical conditions, which include all existing development and the current parcel configuration. The applicant requests a change of the parcel's current zoning district from Rangeland (RL) to Upland Residential 40-acre minimum (U-R:L:40). This also requires a change to the associated General Plan Land Use classification from Range Lands (RL) to Remote Residential 40-acre minimum (RMR:40). The Rangeland district has a 160-acre minimum for new subdivisions, and a density limit of one single-family residence (SFR) per 160 acres. The parcel is currently assessed at 160.5± acres, so such a conversion would potentially allow a future application to subdivide the land into as many as four parcels, each entitled to an SFR by right. Local ordinance also allows the construction of either an Accessory Dwelling Unit (ADU) or Second Residential Unit (SRU) wherever an SFR is permitted. Additionally, the State's housing laws continue to evolve to allow additional dwelling units in certain circumstances which currently include an attached ADU and a Junior ADU for a total of four residential units per parcel. Development of residential units is contingent upon meeting requirements for domestic water and on-site septic, but would be permitted ministerially. However, a land division would be a discretionary action and would require an additional environmental review by the Lead Agency, at which time a more precise review of potential impacts can be evaluated. This report shall analyze any physical impacts that would be a result of the approval of a General Plan Amendment and Rezone.

A change in the General Plan Classification and zoning district will also result in a change to the uses that may be allowed on the parcel. A change from Rangeland to Upland Residential would result in the following changes in allowed uses, either ministerial or discretionary:

Uses Gained:

- Group Care *(emergency shelters, intermediate care facilities, rest homes)*
- Major Impact Facilities *(airports, hospitals, detention & correction facilities, corporation yards)*

Uses that are Ministerial and would become Discretionary:

- Animal Sales & Services – Kennels *(boarding kennels, pet motels, dog training centers)*
- Animal Waste Processing *(processing of animal manure, bedding waste, and similar byproducts)*
- Forest Production & Processing – Portable Sawmills *(portable milling machines for rough-sawn lumber)*
- Packing & Processing – Winery *(crushing, fermentation, storage, and bottling of wine from grapes grown on or off the premises. Also includes tasting rooms and breweries)*

Uses Lost:

- Agricultural Sales & Services *(nurseries, hay, feed and grain stores, crop dusting, tree service)*
- Animal Raising – Personal *(the raising of hen chickens or rabbits for personal use)*
- Animal Sales & Services – Stockyards *(stockyards or animal sales yards)*
- Commercial Recreation – Outdoor Entertainment *(sports arenas, racing facilities, amusement parks)*
- Commercial Recreation – Outdoor Sports & Recreation *(driving ranges, golf courses, swimming pools, tennis courts)*
- Packing & Processing – Commercial Cooperage *(manufacture of wood vessels, such as barrels)*
- Packing & Processing – General *(processing of crops, water, or animals and their byproducts regardless where they are grown or found)*

Of the two uses that would be gained by the district change, both would require additional discretionary permits prior to approval.

The project site is located off Vichy Springs Road in the eastern foothills of the Ukiah Valley. Access is provided via a private driveway off Vichy Springs Road. The site sits in a small valley with steep to moderate hills on the north, west and south sides, and a more gradual slope to the east towards the Cow Mountain range. It is developed with one single family residence, a barn and a driveway, which sit in a small draw near the center of the site. The SFR is served by Rogina Water Company for domestic water and has an on-site septic system. The difference in elevation from the lowest portion (~760 feet) to the highest portions

(~1000 feet) is 240 feet, indicating significant elevation changes within a relatively small area. The remainder of the site is unimproved and consists of grasslands and oak woodlands.

The parcels to the north and east are also in agricultural zonings, with lower density Rangeland to the north and higher density Agricultural zoning to the east. These areas are similarly developed with very low density residential uses surrounded by grazing lands and some vineyard. The northeast corner of the parcel is adjacent to the Vichy Springs Community Homes development, a high-density residential neighborhood served by both a public water and sanitation district. The entire western and southern boundary of the parcel is adjacent to the Rogina Heights subdivision, a single-family zoned (R1) medium-density residential development served by a public water district.

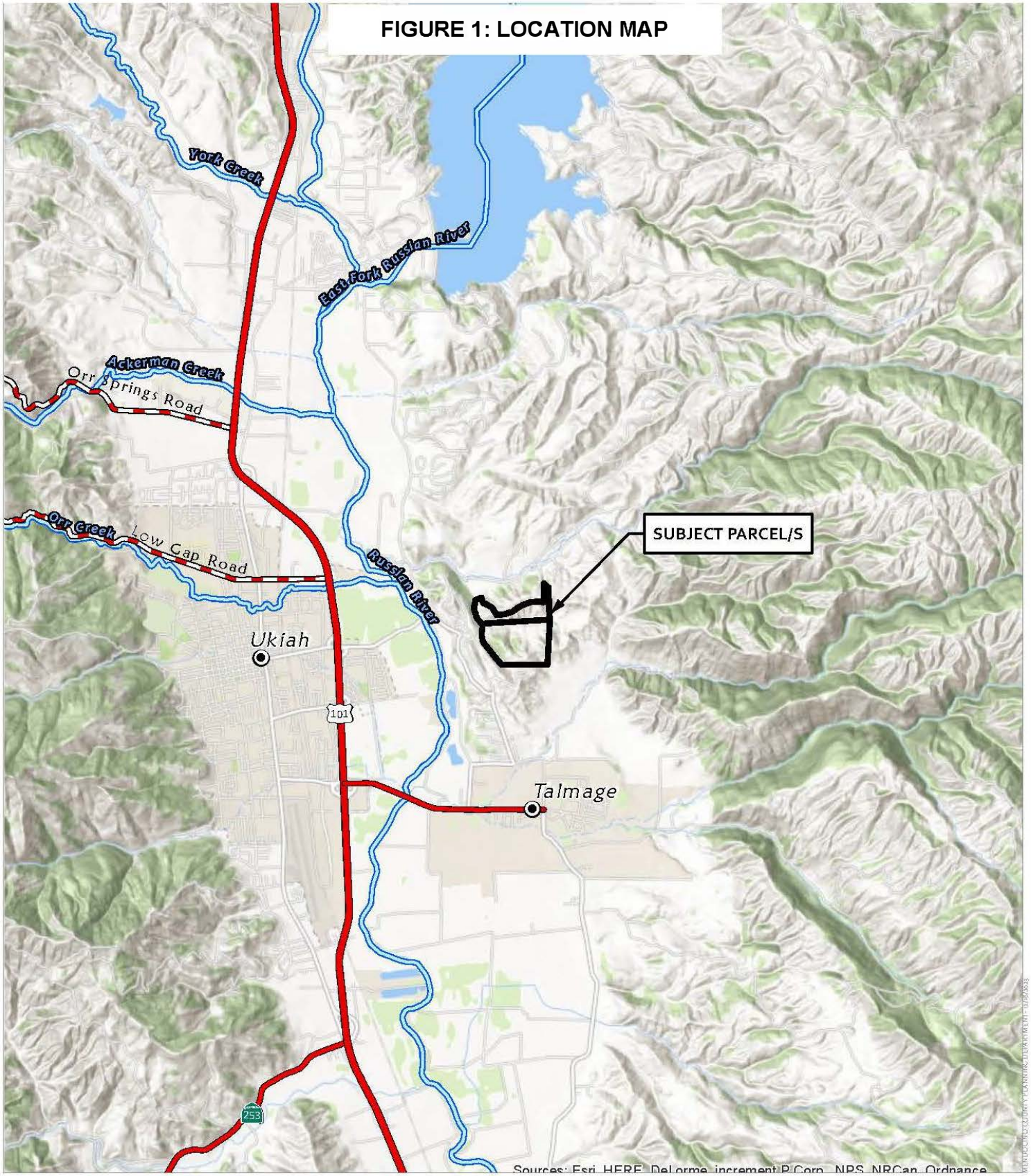
Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements): CAL FIRE, Ukiah Valley Fire Authority, Rogina Water Company (for future development).

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Pursuant to the consultation requirements of Assembly Bill (AB) 52, in July 2022, the County of Mendocino (County) provided formal notification to the California Native American tribes that requested notification of all new potential Negative Declarations within the County. Project notifications and request for comment were sent to the Redwood Valley Rancheria, the Sherwood Valley Band of Pomo Indians and the Round Valley Tribe. Follow-up consultation and review was requested by the Robinson Rancheria and a consultation fee was paid, but no response was ever received. As of the date of this report, no response was received from any of these agencies.

PROJECT PLOT PLAN: See Pages 4 - 6 of this document for location and site maps.

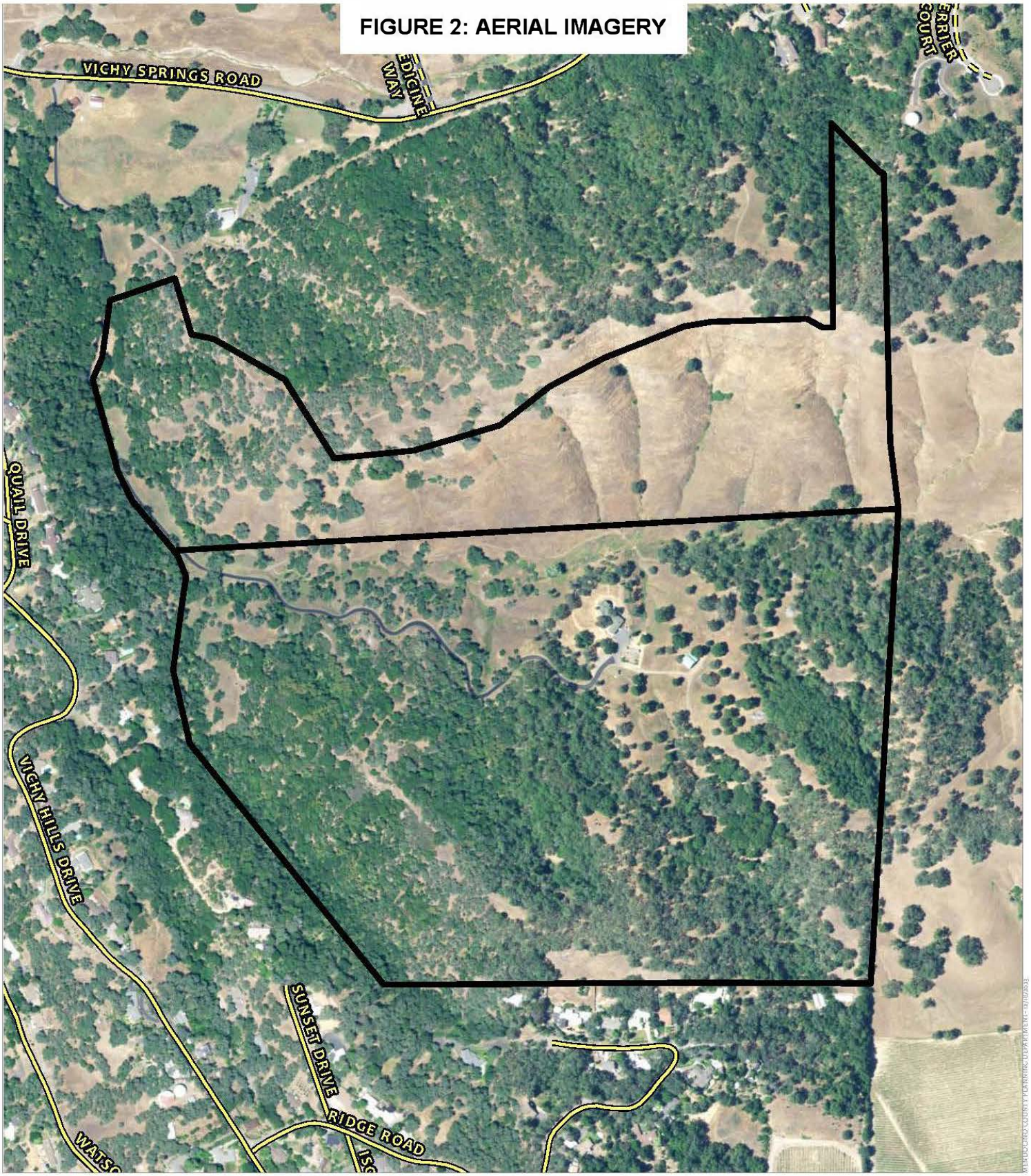
FIGURE 1: LOCATION MAP



CASE: GP/R 2023-0002
OWNER: Rustic Retirement, LLC
APN: 178-220-09, 181-240-01
APLCT: CARTER, Jared & Bonnie
AGENT: None
ADDRESS: 1961 Vichy Springs Road, Ukiah

LOCATION MAP

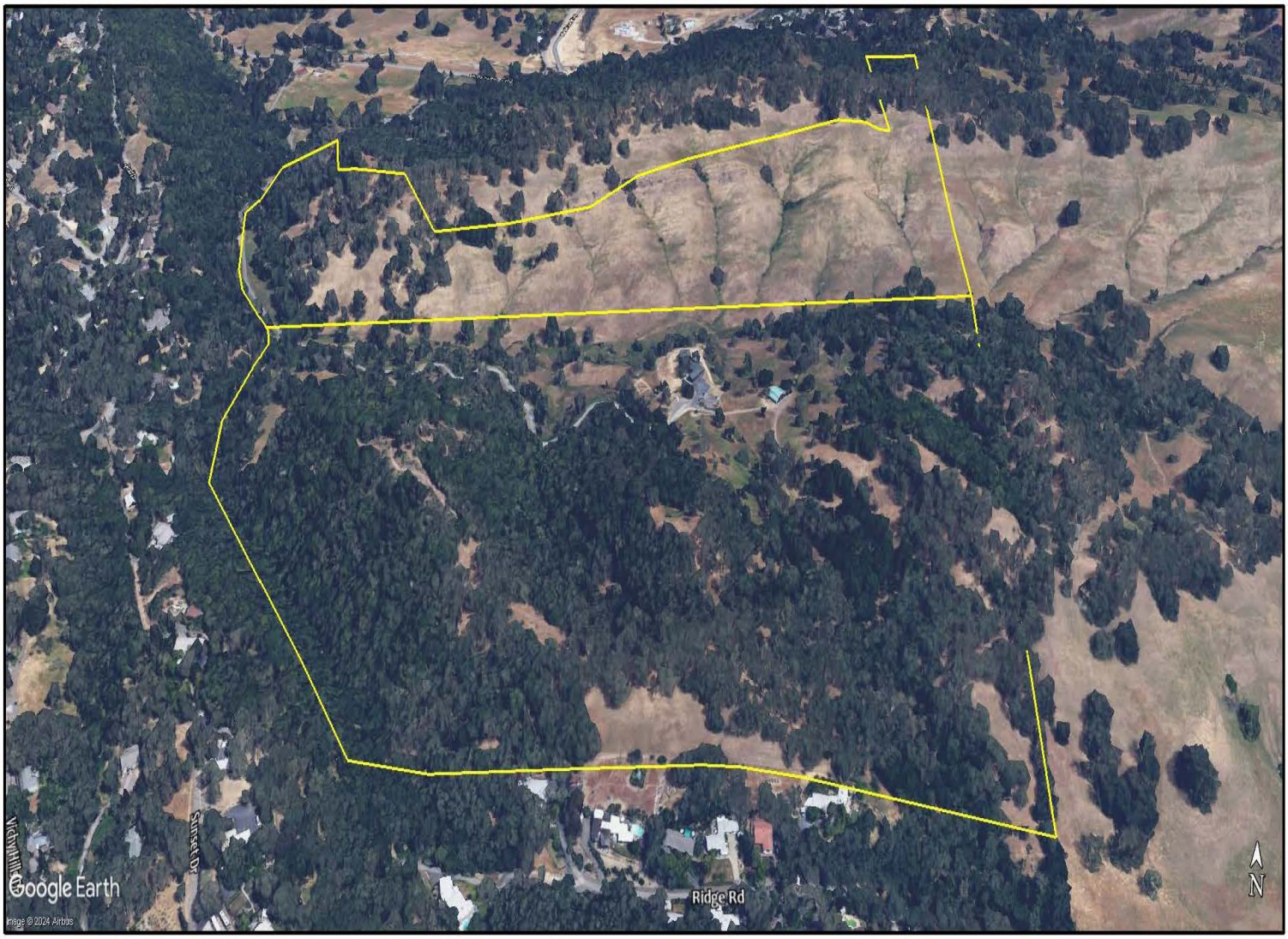
FIGURE 2: AERIAL IMAGERY



CASE: GP/R 2023-0002
OWNER: Rustic Retirement, LLC
APN: 178-220-09, 181-240-01
APLCT: CARTER, Jared & Bonnie
AGENT: None
ADDRESS: 1961 Vichy Springs Road, Ukiah

AERIAL IMAGERY

FIGURE 3: PLOT PLAN



ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" as indicated by the checklist on the following pages.

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

DETERMINATION

Based on this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Russ Ford — Signature

12/12/2025 — Date

Russ Ford — Printed Name

Senior Planner — Title

5.1 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?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

DISCUSSION: A scenic vista is defined as a location that offers a high quality, harmonious, and visually interesting view. One roadway in Mendocino County, State Route (SR) 128, was officially added to the eligibility list of State Scenic Highways by California State Assembly Bill 998 on July 12, 2019. According to California Department of Transportation, SR 1 and SR 20 are "eligible" for designation as scenic highways but have not been officially designated as such.

State Route 1 is part of the California Freeway and Expressway System, and through the Los Angeles metro area, Monterey, Santa Cruz, San Francisco metro area, and Leggett, is part of the National Highway System, a network of highways that are considered essential to the country's economy, defense, and mobility by the Federal Highway Administration. State Route 1 is eligible to be included in the State Scenic Highway System; however, only a few stretches between Los Angeles and San Francisco have officially been designated as a "scenic highway", meaning that there are substantial sections of highway passing through a "memorable landscape" with no "visual intrusions."

Additionally, the County has two roadway segments designated as "heritage corridors" by California Public Resources Code Section 5077.5. The North Coast Heritage Corridor includes the entire segment of SR 1 in the county, as well as the segment of U.S. Highway 101 from the junction with SR 1 in Leggett, north to the Humboldt County line. The Tahoe-Pacific Heritage Corridor extends from Lake Tahoe to the Mendocino County coast. It includes the entire segment of SR 20 within the county and the segment of US 101 from the SR 20 junction north of Calpella to the SR 20 highway exit south of Willits. Mendocino County's General Plan Resource Management Goal RM-14's (Visual Character) objective is: *Protection of the visual quality of the county's natural and rural landscapes, scenic resources, and areas of significant natural beauty.*
The main source of daytime glare in the unincorporated portions of the Mendocino County is from sunlight reflecting off of structures with reflective surfaces, such as windows. A nighttime sky in which stars are readily visible is often considered a valuable scenic/visual resource. In urban areas, views of the nighttime sky are being diminished by "light pollution." Two elements of light pollution may affect county residents: sky glow (a result of light fixtures that emit a portion of their light directly upward in the sky), and light trespass (poorly shielded or poorly aimed fixtures which cast light into unwanted areas, such as neighboring properties and homes). Different lighting standards are set by classifying areas by lighting zones (LZ). The 2000 Census classified the majority of Mendocino County as LZ2 (rural), which requires stricter lighting standards in order to protect these areas from new sources of light pollution and light trespass. Mendocino County's General Plan Resource Management Goal RM-15's (Dark Sky) objective is, "*Protection of the qualities of the county's nighttime sky and reduced energy use.*"

a-d) **No Impact:** The project site is not adjacent to an established scenic vista and does not currently possess significant scenic resources, including historic buildings. However, the existing site has a pleasant pastoral character that is in harmony with its surroundings, and this character could be considered a scenic resource. Approval of the project could allow a subdivision at a later date and creation of up to three additional lots, each entitled to the development and additional residential units through a ministerial process. However the resulting development density is significantly less that the adjacent subdivision to the east (Vichy Springs Community Homes), that has a development density of one unit per six thousand square feet, or 290 units per 40 acres. Staff finds that even at full buildout, the potential development will not have a significant impact on the scenic and rural nature of the existing site or neighborhood.

MITIGATION MEASURES: None required.

FINDINGS: The proposed project would have a **NO IMPACT** on Aesthetics.

5.2 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 (FMMP) of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?	☐	☐	☐	☒

DISCUSSION: The State of California Department of Conservation manages the Farmland Mapping and Monitoring Program (FMMP) which produces maps and statistical data used for analyzing impacts on California's agricultural resources. The FMMP mapping survey covers roughly 98% of privately owned land in the state and updates each map approximately every two years to provide an archive of land use change over time. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called "Prime Farmland," with other critical designations including "Unique Farmland," or "Farmland of Statewide Importance."

The Williamson Act (officially the California Land Conservation Act of 1965) provides preferential tax assessments to owners of farmland and open-space land in exchange for a ten year agreement that the land will not be developed or otherwise converted to another use. Since the early 1980's participation in the program has hovered around 16 million acres enrolled under contract, constituting about one third of all privately held land in the state and about one half of the state's agricultural land. The intent of the Williamson Act is to preserve a maximum amount of a limited supply of prime agricultural land to discourage premature and unnecessary conversion of prime agricultural land to urban uses.

The Timberland Production Zone (TPZ) was established in 1976 in the California Government Code as a designation for lands for which the Assessor's records as of 1976 demonstrated that the "highest and best use" would be timber production and its accessory uses. Public improvements and urban services are prohibited on TPZ lands except where necessary and compatible with ongoing timber production. The original purpose of TPZ Zoning District was to preserve and protect timberland from conversion to other more profitable uses and ensure that timber producing areas not be subject to use conflicts with neighboring lands.

a) **No Impact:** The project site is currently classified as *Grazing Land* under the State FMMP, and so would not result in the conversion of Prime Farmland, Unique Farmland or Farmland of Statewide Importance.

b) **No Impact:** The project site had been subject to a Williamson Act contract under previous ownership. That contract was placed into nonrenewal status more than 10 years ago, and has now completed roll out.

c) **No Impact:** The project site is currently zoned Rangeland (RL). Despite a significant amount of oak woodlands along the southern portion of the parcel, no timber resources have been identified on the site and no impact to forest land resources would occur as a result of approval.

d) **No Impact:** The project site is currently zoned Rangeland (RL) and used primarily as open space. No conversions of forest land would occur as a result of project approval.

e) **No Impact:** The parcel immediately to the north, also a 160 acre lot, is currently subject to a Williamson Act contract. It's possible that approval of this project could prompt a similar application from that property owner, which would require that property be removed from contract and taken out of agricultural status. That parcel is very similar in character to the project site but does not appear to currently have any agricultural uses. Both sites have steep hillsides and thick oak woodlands, making their agricultural uses for anything other than grazing challenging. Should this project be approved and the neighboring parcel apply for a similar amendment, staff finds that there would be no impact on current agricultural production or uses in the area.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have **NO IMPACT** on Agricultural and Forestry Resources.

5.3 AIR QUALITY

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?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

DISCUSSION: Mendocino County is located within the North Coast Air Basin, consisting of Del Norte, Humboldt, Trinity, Mendocino, and northern Sonoma counties. Additionally, the Mendocino County Air Quality Management District (MCAQMD) is responsible for enforcing state and federal clean air acts, as

well as local air quality protection regulations. Any new emission point source is subject to an air quality permit, consistent with the district's air quality plan, prior to project construction. The MCAQMD also enforces standards requiring new construction, including houses, to use energy efficient, low-emission EPA certified wood stoves and similar combustion devices to help reduce area source emissions.

MCAQMD operates air monitoring stations in Fort Bragg, Ukiah, and Willits. Based on the results of monitoring, the entire County has been determined to be in attainment for all Federal criteria air pollutants and in attainment for all State standards except Particulate Matter less than 10 microns in size (PM10). In January of 2005, MCAQMD adopted a Particulate Matter Attainment Plan establishing a policy framework for the reduction of PM10 emissions, and has adopted Rule 1-430 which requires specific dust control measures during all construction operations, the grading of roads, or the clearing of land as follows:

1) All visibly dry, disturbed soil road surfaces shall be watered to minimize fugitive dust emissions;

2) All unpaved surfaces, unless otherwise treated with suitable chemicals or oils, shall have a posted speed limit of 10 miles per hour;

3) Earth or other material that has been transported by trucking or earth moving equipment, erosion by water, or other means onto paved streets shall be promptly removed;

4) Asphalt, oil, water, or suitable chemicals shall be applied on materials stockpiles and other surfaces that can give rise to airborne dusts;

5) All earthmoving activities shall cease when sustained winds exceed 15 miles per hour;

6) The operator shall take reasonable precautions to prevent the entry of unauthorized vehicles onto the site during non-work hours; and

7) The operator shall keep a daily log of activities to control fugitive dust. In December 2006, MCAQMD adopted Regulation 4, Particulate Emissions Reduction Measures, which establishes emissions standards and use of wood burning appliances to reduce particulate emissions. These regulations applied to wood heating appliances, installed both indoors and outdoors for residential and commercial structures, including public facilities. Where applicable, MCAQMD also recommends mitigation measures to encourage alternatives to woodstoves/fireplaces, to control dust on construction sites and unpaved access roads (generally excepting roads used for agricultural purposes), and to promote trip reduction measures where feasible. In 2007, the Air Resources Board (ARB) adopted a regulation to reduce diesel particulate matter (PM) and oxides of nitrogen (NOx) emissions from in-use (existing) off-road heavy-duty diesel vehicles in California. Such vehicles are used in construction, mining, and industrial operations. The regulation imposes limits on idling, requires a written idling policy, and requires disclosure when selling vehicles. Off-road diesel-powered equipment used for grading or road development must be registered in the Air Resources Board DOORS program and be labeled accordingly. The regulation restricts the adding of older vehicles into fleets and requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies. In 1998, the California Air Resources Board established diesel exhaust as an Air Toxic, leading to regulations for categories of diesel engines. Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material which contributes to PM2.5. All stationary and portable diesel engines over 50 horsepower need a permit through the MCAQMD.

Receptors include sensitive receptors and worker receptors. Sensitive receptors refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (these sensitive land uses may also be referred to as sensitive receptors). Worker receptors refer to employees and locations where people work.

a) **No Impact:** Project approval would not conflict with or obstruct any existing air quality management plan. Foreseeable pollutants would be limited to only those associated with rural residential uses, such as dust generation and incidental pesticide uses.

b) **No Impact:** Mendocino County is in attainment with all pollutant standards with the exception of PM10 particulates, such as those generated from travel over natural surface roadways. The existing driveway at the project site is improved with asphalt pavement and does not generate particulates. Potential future development of the site could include the creation of additional driveways and access roads, but impacts from these would be minimal and would require additional analysis at the time of development.

c) **No Impact:** The project site is not within critical distance of any sensitive receptors, including schools, childcare facilities or youth programs. Potential pollutants generated on the site would likely include dust particulates from natural surface roadways and residential-use chemicals. The low density and large lot size required of the UR-40 zone would create a substantial buffer between residential development within and outside of the project area, mitigating the effect of possible pollutants on adjacent locations.

d) **No Impact:** The allowed uses in the existing Rangeland district are more permissive than those allowed in the proposed UR district (see *Project Description* above for analysis of use changes). No new ministerial uses would be gained by the change and several would be lost. Any new development that is not currently principally permitted would require a discretionary permit or be prohibited.

FINDINGS: The proposed project would have **NO IMPACT** on Air Quality.

5.4 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 Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

WOULD THE PROJECT:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

DISCUSSION: Mendocino County's Biology and Ecology Resources Policy RM-28 states: *all discretionary public and private projects that identify special-status species in a biological resources evaluation (where natural conditions of the site suggest the potential presence of special-status species) shall avoid impacts to special-status species and their habitat to the maximum extent feasible. Where impacts cannot be avoided, projects shall include the implementation of site-specific or project-specific effective mitigation strategies developed by a qualified professional in consultation with state or federal resource agencies with jurisdiction.*

The California Natural Diversity Database (CNDDB) provides location and natural history information on special status plants, animals, and natural communities to the public, other agencies, and conservation organizations. The data helps drive conservation decisions, aid in the environmental review of projects and land use changes and provide baseline data helpful in recovering endangered species and for research projects. Currently, the CNDDB has 32 species listed for Mendocino County that range in listing status from Candidate Threatened, Threatened, or Endangered.

Many species of plants and animals within the State of California have low populations, limited distributions, or both. Such species may be considered "rare" and are vulnerable to extirpation as the state's human population grows and the habitats these species occupy are converted to agricultural and urban uses. A sizable number of native species and animals have been formally designated as threatened or endangered under State and Federal endangered species legislation. Others have been designated as "Candidates" for such listing and the California Department of Fish and Wildlife (CDFW) have designated others as "Species of Special Concern". The California Native Plant Society (CNPS) has developed its own lists of native plants considered rare, threatened, or endangered. Collectively, these plants and animals are referred to as "special status species."

Section 404 of the Clean Water Act defines wetlands as "*those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstance do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bog and similar areas.*"

Mendocino County currently has one active Habitat Conservation Plan (HCP) with the California Department of Fish and Wildlife which provides protections for the Point Arena Mountain Beaver. The Fisher Family HCP (Permit #TE170629-0) covers 24 acres of coastal scrub and was adopted December 3, 2007 for a period of 50 years. The Fisher Family HCP applies to parcel APN 027-211-02 located at 43400 Hathaway Crossing, Point Arena. Additionally, since 2003, the Mendocino Redwood Company (MRC) has managed the County's only Natural Community Conservation Plan which covers all lands owned by the MRC to preserve regionally important habitat

a) **No Impact:** The project site is identified as potential habitat for the red-bellied newt (*Taricha rivularis),* an S2 ranked California Species of Special Concern[1]. The primary habitat of the newt is streams and rivers, which are necessary for breeding. As there would be the possibility of habitat disruption by potential future development allowed by this project, mitigation measures should be applied to future discretionary projects that permit additional development in order to provide protection to breeding and habitat areas that may be located within the project site.

b) **No Impact:** The project area is not identified in any regional plan by CDFW or USFS.

[1] https://californiaherps.com/salamanders/pages/t.rivularis.html#status

c) **No Impact:** The project area does not have any state or federally protected wetlands within its boundaries. Seasonal creeks run along the western boundary and northern portion of the site and join into Sulphur Creek approximately 2,000 feet downstream. No impacts to drainage areas would occur as a result of this project, although potential future development resulting from project approval engenders a slight chance of stream impacts related to runoff and construction-related grading and should be mitigated accordingly.

d) **No Impact:** The project will not 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? The two Sulphur Creek tributaries within the project area are not identified as Coho or salmonid habitat, and future development is likely to be residential in nature and occur away from streams and creeks.

e) **No Impact:** The project site has a significant amount of oak woodland habitat, particularly on the southern half of the property. Although future development would be limited to a total of four parcels, impacts to the majority of the oak woodland habitat would likely be minimal. Mendocino County General Plan Policy RM-28 states a goal to "*maintain and improve oak woodland habitat to provide for slope stabilization, soil protection, species diversity and wildlife habitat*", and to "*preserve oak trees and other vegetation that occur near the heads of drainages or depressions to the maximum extent possible*". Additionally, the Ukiah Valley Area Plan similarly includes oak woodlands protections, specifying a 3:1 replanting ratio and five year monitoring for any trees that may need to be removed for residential development or fire safety standards. No oaks are proposed to be removed as a result of this General Plan Amendment and Rezoning; however, if the property is subdivided in the future to create additional lots, staff recommends that these requirements be implemented to assure continued protection of the oak resources on the property.

f) **No Impact:** The project area is not the subject of a current habitat conservation plan.

FINDINGS: The proposed project would have **NO IMPACT** on Biological Resources.

5.5 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 pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5?	☐	☐	☐	☒
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

DISCUSSION: Archeological resources are governed by MCC Sec. 22.12.090, which echoes state law regarding discovery of artifacts and states, in part, "*It shall be unlawful, prohibited, and a misdemeanor for any person knowingly to disturb, or cause to be disturbed, in any fashion whatsoever, or to excavate, or cause to be excavated, to any extent whatsoever, an archeological site without complying with the provisions of this section*". MCC Section 22.12.090 governs discovery and treatment of archeological resources, while Section 22.12.100 speaks directly to the discovery of human remains and codifies the procedures by which said discovery shall be handled. Pursuant to California Code of Regulations, Title 14, Chapter 3, Sub Section 15064.5(c)(4), "*If an archeological resource is neither a unique archeological nor an historic resource, the effects of the project on those resources shall not be considered a significant effect on the environment.*"

a-c) **No Impact:** Consistent with SB 18, a request for consultation was submitted to the Native American Heritage Commission (NAHC) in July of 2025. The NAHC provided a list of

interested tribes within the project area and subsequent notices were sent to all of these agencies. Only one, Robinson Rancheria, responded with a request for additional review and consultation, which was submitted on July 30th, 2025, approximately. No comment was ever received from the rancheria despite several outreach attempts by staff. While the project itself does not include ground disturbance, it would open the possibility of a minor subdivision to create up to three additional parcels. Each parcel would then be entitled to certain ministerial uses including residences and septic fields, which include ground disturbance. As part of the minor subdivision process, referrals would be made to the Northwest Information Center (NWIC) at Sonoma State for review of cultural resources. Based on the determination of NWIC and the Mendocino County Archaeological Commission, conditions related to protection of any cultural resources on site would be applied at the time of subdivision and may include anything from simple notifications (the "discovery clause") to restrictive building envelopes. Additionally, the Arch Resources chapter of the Mendocino County Code (Chapter 22.12) contains a provision for processing the unexpected location of resources, and provides some general protection regardless of project conditions.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have **NO IMPACT** on Cultural Resources.

5.6 ENERGY

WOULD THE PROJECT:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

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

Permanent structures constructed on-site would be subject to Part 6 (California Energy Code) of Title 24 of the California Code of Regulations, which contains energy conservation standards applicable to residential and non-residential buildings throughout California. The 2019 Building Energy Efficiency Standards are designed to reduce wasteful, uneconomic, inefficient, or unnecessary consumption of energy, and enhance outdoor and indoor environmental quality. It is estimated that single-family homes built with the 2019 standards will use about 7 percent less energy due to energy efficiency measures versus those built under the 2016 standards (CEC, 2016).

a) **No Impact:** The project itself would have no impact on energy consumption. Future development allowed after project approval would be required to meet all building code requirements in effect at the time, including the energy code and solar requirements for traditional single-family dwellings.

b) **No Impact:** No conflicts with state or local renewable energy plans would occur as a result of project approval. Future development made possible by project approval would be required to meet building standards for renewable energy.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have **NO IMPACT** on Energy.

5.7 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.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

DISCUSSION: The Maacama Fault extends from northern Sonoma County to north of Laytonville. The Maacama Fault is the northern most segment of a series of closely related faults within the San Andreas Fault system that includes the Hayward, Rodgers Creek, and Healdsburg faults to the south. Historically, the Maacama Fault has generated only a few moderate earthquakes. However, an abundance of micro-earthquakes (less than magnitude 3) are associated with the fault. A magnitude 5.6 earthquake was reported in the Ukiah area in 1869. Several, earthquakes in the magnitude range of 4, with the strongest 4.9, were recorded in the Ukiah area between 1977-1978. At locations east of Willits and Ukiah surface fault creep, or very slow movements across know fault locations, have been documented.

The vast majority of Mendocino County is underlain by bedrock of the Franciscan Formation. Thick soil development and landslides very commonly cover the underlying bedrock throughout the county. Due to

the weak and deformed nature of the Franciscan rocks, they are prone to deep weathering and development of thick overlying soils. Soil deposits in swales and on the flanks of slopes commonly contain substantial amounts of clay and weathered rock fragments up to boulder size. These soils can be unstable when wet and are prone to slides. Land sliding of such soils is widespread in Mendocino County, particularly in the eastern belt of the Franciscan Formation beneath the eastern portion of the county. Human activities that affect vegetation, slope gradients, and drainage processes can also contribute to landslides and erosion.

a) **No Impact:** The Maacama Fault zone intersects the project site along its western boundary, with the mapped fault zone encroaching approximately 250 feet into the existing parcel. The west side of the parcel is bound by a seasonal creek and significant slopes that back up against the Rogina Subdivision, making any development in that area extremely unlikely. However, any future development would likely be subject to strong shaking should a fault rupture occur within the general area, and residential structures would need to be engineered to withstand expected seismic events. Much of California falls into seismic zone D and new structures are already required to meet additional engineering standards regarding seismic resistance, landslide potential and liquefaction. The project site is classified as an 'unevaluated' area on the State Department of Conservation's Seismic Hazards Zones map, but any future development would be subject to applicable building code regulations.

b) **No Impact:** Approval of the project will not result in additional ministerial entitlements beyond those that currently exist, including the ability to develop ADU or accessory structures. The project will not result in substantial soil erosion or loss of topsoil, and standard BMPs will be required as a part of any future building permit process.

c) **No Impact:** The project site is classified as part of the QPc geologic unit, related to nonmarine continental sedimentary rocks, including sandstone, shale and loosely consolidated gravel deposits.[2] Future development may require engineering and compaction tests, depending on the proposed location within the project site. This would be captured at the building permit phase.

d) **No Impact:** The project site is not comprised of expansive soil types as such types are classified in Table 18-1-B of the 1994 UBC.

e) **No Impact:** Percolation tests will be required at the time a building permit is submitted and may vary significantly depending on the proposed location. The existing parcel is currently developed with a single family dwelling including leach field, which provides evidence that adequate soils exist within the project area.

f) **No Impact:** No unique paleontological or geological features have been identified within the project site.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have a **NO IMPACT** on Geology and Soils.

[2] https://maps.conservation.ca.gov/cgs/metadata/GDM_002_GMC_750k_v2_metadata.html

5.8 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 (GHG), either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

DISCUSSION: Assembly Bill 32 (AB32), the California Global Warming Solutions Act, 2006 recognized that California is a source of substantial amounts of greenhouse gas (GHG) emission which poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. AB32 established a state goal of reducing GHG emission to 1990 levels by the year 2020 with further reductions to follow. In order to address global climate change associated with air quality impacts, CEQA statutes were amended to require evaluation of GHG emission, which includes criteria air pollutants (regional) and toxic air contaminants (local). As a result, Mendocino County Air Quality Management District (AQMD) adopted CEQA thresholds of significance for criteria air pollutants and GHGs, and issued updated CEQA guidelines to assist lead agencies in evaluating air quality impacts to determine if a project's individual emissions would be cumulatively considerable. According to the AQMD, these CEQA thresholds of significance are the same as those, which have been adopted by the Bay Area Air Quality Management District (BAAQMD). Pursuant to the BAAQMD CEQA Guidelines, the threshold for project significance of GHG emissions is 1,100 metric tons CO2e (CO2 equivalent) of operation emission on an annual basis. Additionally, Mendocino County's building code requires new construction to include energy efficient materials and fixtures.

a-b) **No Impact:** The estimated residential vehicle-miles per person for the project site's census block is 25.9, which is higher than the statewide average of 21 vehicle-miles per person.[3] This census block includes the adjacent Vichy Springs Community Homes Planned Development to the east, and additional residential development to the south. However, no additional trips would be generated by the project as no additional ministerial development would be permitted beyond what currently exists. The project would create the possibility of a future subdivision to divide the subject parcel into as many as four lots, but any impacts related to such development would be analyzed at the time an application was submitted.

MITIGATION MEASURES: None

FINDINGS: The proposed project would have **NO IMPACT** on Greenhouse Gas Emissions.

5.9 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

[3] Fehr & Peers HBx Heatmap

WOULD THE PROJECT:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

DISCUSSION: California Health and Safety Code states: "Hazardous material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment (California Health and Safety Code Section25501 (m)).

Mendocino County has adopted a Hazardous Waste Management Plan to guide future decisions by the County and the incorporated cities about hazardous waste management. Policies in this General Plan emphasize source reduction and recycling of hazardous wastes and express a preference for onsite hazardous waste treatment over offsite treatment. The Hazardous Waste Management Plan proposed a number of hazardous waste programs and set forth criteria to guide the siting of new offsite hazardous waste facilities. However, to date, no facilities have been cited in the county. In 1997, the County Division of Environmental Health assumed responsibility for administering hazardous waste generation and treatment regulations. Solid Waste and Hazardous Waste and Materials Management Policy DE-203 states: *All development projects shall include plans and facilities to store and manage solid waste and hazardous materials and wastes in a safe and environmentally sound manner.*

The California Air Resources Board classifies asbestos as a known human carcinogen. Asbestos of any type is considered hazardous and may cause asbestosis and lung cancer if inhaled, becoming permanently lodged in body tissues. Exposure to asbestos has also been shown to cause stomach and other cancers. Asbestos is the general name for a group of rock-forming minerals that consist of extremely strong and durable fibers. When asbestos fibers are disturbed, such as by grading and construction activities, they are released into the air where they remain for a long period of time. Naturally occurring asbestos is an issue of concern in Mendocino County, which contains areas where asbestos-containing rocks are found. The presence of ultramafic rocks indicates the possible existence of asbestos mineral groups. Ultramafic rocks contain 90 percent or more of dark-colored, iron-magnesium-silicate minerals. Ultramafic rocks may be partially or completely altered to a rock known as serpentinite, more commonly called serpentine.

The Mendocino County Air Quality Management District enforces state regulations to reduce the effects of development projects involving construction sites and unpaved roads in areas tested and determined by a state-registered geologist to contain naturally occurring asbestos. Serpentine and ultramafic rocks are common in the eastern belt of the Franciscan Formation in Mendocino County. Small, localized areas of serpentine do occur in the coastal belt of the Franciscan Formation, but they are significantly less abundant.

Mendocino County's aviation system is composed of airports, privately owned aircraft of various types, privately operated aircraft service facilities, and publicly and privately operated airport service facilities. Most aircraft are privately owned, small single or twin-engine planes flown primarily for personal business. Six public use airports in Mendocino County provide for regional and interregional needs of commercial and general aviation. Actions involving areas around airports will continue to be evaluated for consistency with the County's Airport Comprehensive Land Use Plan and applicable federal regulations. Mendocino County's Airport Policy DE-167 states: *"Land use decisions and development should be carried out in a manner that will reduce aviation-related hazards (including hazards to aircraft, and hazards posed by aircraft)".*

The California Department of Forestry and Fire Protection divides the County into fire severity zones. These maps are used to develop recommendations for local land use agencies and for general planning purposes.

a-c) **No Impact:** The primary use of the project site and potential future parcels will remain residential and agricultural, and no transportation, storage, handing, or disposal of significant amounts of hazardous materials will occur on the site as a result of project approval. No schools have been identified within one quarter mile of the project site.

d) **No Impact:** The project site has not been identified as a hazardous materials site on any public inventory.

e) **No Impact:** The project site is outside of the Ukiah Valley Municipal Airport Land Use Compatibility Plan and so no impacts would occur from airport uses.

f) **No Impact:** The project site takes access from Vichy Springs Road, near its intersection with Redemeyer Road. Redemeyer Road serves as a secondary artery providing access to several major residential developments in the region, including the Vichy Springs Community Homes, Deerwood Estates and El Dorado Estates. In July 2020, an Evacuation Plan was adopted as an annex to the Mendocino County Emergency Operations Plan (EOP)[4]. The project site would fall into Planning Area 2 on that plan, covered by CAL FIRE battalion 3. The proposed project would not conflict with any of the procedures in that document.

g) **No Impact:** The project site is rural, comprised of hillsides covered with native grasslands and oak woodlands, which can be susceptible to rapid spread of wildfire. However, no additional development beyond what is currently permitted would occur as a result of project approval. Additional regulations already in existence, such as CAL FIRE defensible space requirements and Public Resources Code section 4290 clearances required for building permits would further help regulate development to areas that may be more successfully protected from wildfire impacts.

MITIGATION MEASURES: None

FINDINGS: The proposed project would have a **NO IMPACT** on Hazards or Hazardous Materials.

5.10 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?	☐	☐	☐	☒

[4] Mendocino County Evacuation Plan

WOULD THE PROJECT:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	☒
i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐	☒
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
iv) Impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

DISCUSSION: Regulatory agencies include the state and regional water quality control boards; State Water Resources Control Board (SWRCB) and the North Coast Regional Quality Control Board (NCRWQCB). The State Water Resources Control Board is responsible for implementing water quality standards in California. Water Code Section 13050(d) states: *Waste includes sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation, including waste placed within containers of whatever nature prior to, and for purposes of, disposal.* Typical activities and uses that affect water quality include, but are not limited to, discharge of process wastewater from factories, confined animal facilities, construction sites, sewage treatment facilities, and material handling areas which drain into storm drains.

Water Code Section 1005.1 defines groundwater as *water beneath the surface of the ground, whether or not flowing through known and definite channels*. Both surface water and groundwater define a watershed, as they move from higher to lower elevations. In Mendocino County, groundwater is the main source for municipal and individual domestic water systems, outside of the Ukiah Valley, and contributes significantly to irrigation. Wells throughout Mendocino County support a variety of uses, including domestic, commercial, industrial, agricultural needs, and fire protection. The County's groundwater is found in two distinct geologic settings: the inland valleys and the mountainous areas. Mountainous areas are underlain by consolidated rocks of the Franciscan Complex, which are commonly dry and generally supply less than 5 gallons per minute of water to wells. Interior valleys are underlain by relatively thick deposits of valley fill, in which yields vary from less than 50 gallons per minute to 1,000 gallons per minute. There are six identified major groundwater basins in Mendocino County. Groundwater recharge is the replacement of water in the groundwater aquifer. Recharge occurs in the form of precipitation, surface runoff that later enters the ground, irrigation, and in some parts of California (but not in Mendocino County) by imported water. Specific information regarding recharge areas for Mendocino County's groundwater basins is not generally available, but recharge for inland groundwater basins comes primarily from infiltration of precipitation and intercepted runoff in stream channels, and from permeable soils along the margins of valleys. Recharge for coastal groundwater basins takes place in fractured and weathered bedrock and coastal terraces, and along recent alluvial deposits and bedrock formations. If recharge areas are protected from major modification -

such as paving, building and gravel removal –it is anticipated that continued recharge will re-supply groundwater reservoirs.

The basic source of all water in Mendocino County is precipitation in the form of rain or snow. Average annual rainfall in Mendocino County ranges from slightly less than 35 inches in the Ukiah area to more than 80 inches near Branscomb. Most of the precipitation falls during the winter, and substantial snowfall is limited to higher elevations. Rainfall is often from storms which move in from the northwest. Virtually no rainfall occurs during the summer months.

a-c) **No Impact:** The proposed change to the zoning districts would increase the allowable density and provide an opportunity for future subdivision of the parcel into as many as four lots. This would require a separate discretionary and environmental review to be conducted at the time such a project was submitted. Uses would continue to be limited to those of a residential or agricultural nature, and waste discharge from residential development would be regulated by the Division of Environmental Health.

d) **No Impact:** The project site does not fall within any identified flood hazard, tsunami or seiche zone.

e) **No Impact:** In 2017, the County of Mendocino created the Groundwater Sustainability Agency to coordinate, protect and maintain groundwater resources within the Ukiah Valley area, which includes the Rogina Water Company, the district providing domestic water to the project site. As of the date of this report, the GSA continues to work out the details for a Groundwater Sustainability Plan and the best ways to implement protections. The proposed project would not interfere with such a plan, but overall impacts can be expected to be minimal. Maximum buildout of the site would include up to three additional dwelling units. Daily estimates of residential water usage vary from 260 gallons per day per housing unit[5] to as much as 500 gallons per day[6]. Rogina Water Company currently offers new connections to parcels within their district, so it can be assumed that supply currently exceeds demand. Future hookups to the district will be required to secure a 'will-serve' letter from the district in order to verify sufficient resources are available.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have a **NO IMPACT** on Hydrology and Water Quality.

5.11 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?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

DISCUSSION: All lands within the unincorporated portions of Mendocino County are regulated by the General Plan and zoning ordinance, as well as several more locally derived specific plans, such as the Gualala Town Plan, or Ukiah Valley Area Plan. The proposed project falls within the boundaries of the Ukiah Valley Area Plan and is subject to the policies of said plan. During project referrals, a number of agencies that may have jurisdiction over the project were contacted.

a) **No Impact:** The project site is located east of the City of Ukiah in the foothills of the Ukiah Valley between the Rogina Heights Subdivision and just west of the Vichy Springs Community

[5] NAHB Residential Water Use Study

Homes Planned Development, both high density residential areas. These residential neighborhoods are broadly considered part of the Ukiah community area and would not be divided by approval of this project.

b) **No Impact:** The Mendocino County General Plan and Ukiah Valley Area Plan have a number of policies that would potentially apply to this project:

- GP DE-1: *"Future growth in Mendocino County should be accommodated .. in unincorporated communities with the infrastructure and service capacity to support growth. Future growth should be encouraged on infill parcels and areas contiguous to existing development."* As noted above, the project site lies between two high-density residential developments, is accessed by a publicly maintained road (Vichy Springs Road) and is served by a public water district. Future development would require verification from the water district that capacity exists to serve proposed uses, but the project is otherwise consistent with GP Policy DE-1.
- GP DE-17: *"The policy of the County and the intent of the [rangeland] classification shall be to protect these lands from the pressures of development and preserve them for future use as designated."* Approval of the project would convert an existing Rangeland parcel into an Upland Residential partial, potentially allowing future subdivision into as many as four lots and likely loss of some grazing land. The EIR prepared for the Vichy Springs Community Homes Subdivision provided grazing information based on the soil types in the area, concluding that local soil types would require approximately 72 acres to support one 1,000 pound steer without overgrazing. Given that estimate, the 160 acre project site would be able to sustain only two head of cattle without overgrazing or requiring supplementary feeding, which would not be viable as an agricultural operation. The site was previously under a Williamson Act contract but has since completed its nonrenewal and is now unencumbered. Staff finds that the potential agricultural uses of the project site are negligible and conversion to low-density residential uses would not constitute a significant loss of grazing lands.
- GP DE-121: *"New discretionary development will be required to demonstrate that basic infrastructure is available and has adequate capacity to serve the project including fire flow capacity without degrading the existing level of service standards."* The project site is within the service boundaries of the Rogina Water Company and the existing single family dwelling is served by the district. Future development would be required to obtain a 'will-serve' letter from the district confirming that adequate capacity exists to serve the potential development.
- GP DE-214: *"The County shall deny development proposals that present substantial fire hazard risk to residents and safety providers responding to a wildland fire."* As discussed above, the project site features steep slopes, hillside grasslands and much oak woodland, all of which may contribute to rapid spread of wildfire. Climate change has rapidly altered behavior of large wildland fires and the classification of hazardous areas. Under the current assessment, the project site is considered only a moderate fire hazard severity – the lowest of the three tier ranking. However, as climate change continues to produce unexpected effects, it's reasonable to expect that these classifications and rating may change at some time in the future, possibly with minimal notice. Based on the *current* hazard assessment, the project would not present a substantial fire risk to people or structures. But should any significant length of time pass between this project and future subdivision, it would be necessary to reevaluate hazard risks and impose any appropriate mitigation. This would be captured during the discretionary review associated with a land division application.
- UVAP OC2.3e: *"Require the … conservation … of native true oaks in the design of discretionary projects. Minimize the removal of oaks and other native trees and fragmentation of woodlands, require any trees removed to be replaced, preferably on the site…"* No additional ministerial development would be permitted upon project approval, but future discretionary actions such as a land division should consider potential impacts to oak woodlands and establish suitable conditions.
- UVAP OC3.1b: *"Proposals to convert agricultural lands to non-agricultural classifications will be considered only after satisfying the following requirements;*

- *"The project shall not result in a need for premature expansion of infrastructure in conflict with other area plan policies."* Approval of the project would not result in expansion of infrastructure. The project site and all adjacent parcels are within the service area of the Rogina Water Company, so no expansion is necessary. The Vichy Springs Community Homes to the northeast are served by the Ukiah Valley Sanitation District. Given the costs related to infrastructure expansion, it's unlikely that a low density residential development, as may result from project approval, would prompt expansion of the sanitation district.
- *"The project shall not have a significant adverse effect on agricultural uses in the area."* As discussed above, the existing low-quality soils within the project area make the site's use as grazing land questionable. Adjacent parcels to the north and east are similarly zoned and classified, and currently under Williamson Act contracts. However, the parcel to the north has no reported agricultural uses and data was not available for the eastern parcels. It's reasonable to expect some possible future conversion of the northern parcel given its proximity to existing high-density development (Rogina Heights) and public access. Conversion of the larger parcels to the east is much less likely as the costs to develop infrastructure and access would be significantly higher.
- *"The project site is substantially unusable for agricultural purposes due to encroaching adjacent nonagricultural uses."* As discussed in previous sections, the low quality of the soils within the project site make the use of the parcel for large-scale agricultural uses challenging. Pressures from adjacent nonagricultural uses may also be a factor, but are likely less significant. Approval of the project would reduce the minimum lot size to 40 acres, which would still allow small scale and boutique farm operations on the parcels if desired.
- *The proposal must achieve the long-range goals of the GP and UVAP for the area as it exists prior to the proposal.* One of the project objectives of the UVAP is to "support development that provides a mix of housing types and prices[6]". While it's unlikely that a future subdivision would result in any additional affordable housing, approval of this project would create the opportunity to create more housing of a variety supported by the commercial market, either through a subsequent subdivision or through the use of a dwelling group.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have **NO IMPACT** on Land Use and Planning.

5.12 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?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

DISCUSSION: The Surface Mining and Reclamation Act (SMARA) of 1975 provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure that adverse environmental impacts are minimized, and mined lands are reclaimed to a usable condition. SMARA also encourages the production, conservation, and protection of the state's mineral resources. SMARA requires the State Mining and Geology Board to adopt State policy for the reclamation of mined lands and the conservation of mineral resources.

[6] Ukiah Valley Area Plan EIR – Statement of Overriding Considerations

The most predominant minerals found in Mendocino County are aggregate resources, primarily sand and gravel. Three sources of aggregate materials are present in Mendocino County: quarries, instream gravel, and terrace gravel deposits. The demand for aggregate is typically related to the size of the population, and construction activities, with demand fluctuating from year to year in response to major construction projects, large development activity, and overall economic conditions. After the completion of U.S. 101 in the late 1960s, the bulk of aggregate production and use shifted primarily to residential and related construction. However, since 1990, use has begun to shift back toward highway construction.

a) **No Impact:** No mineral resources of value to the region or State are known to exist within the project site.

b) **No Impact:** The Mendocino County General Plan or Ukiah Valley Area Plan do not identify any locally important mineral resource recovery site within the boundaries of the project area.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have **NO IMPACT** on Mineral Resources.

5.13 NOISE

WOULD THE PROJECT:	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?	☐	☐	☐	☒
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) For a project located within the vicinity of private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

DISCUSSION: Acceptable levels of noise vary depending on the land use. In any one location, the noise level will vary over time, from the lowest background or ambient noise level to temporary increases caused by traffic or other sources. State and federal standards have been established as guidelines for determining the compatibility of a particular use with its noise environment. Mendocino County relies principally on standards in its Noise Element, its Zoning Ordinance, and other County ordinances, and the Mendocino County Airport Comprehensive Land Use Plan to evaluate noise-related impacts of development. Land uses considered noise-sensitive are those in which noise can adversely affect what people are doing on the land. For example, a residential land use where people live, sleep, and study is generally considered sensitive to noise because noise can disrupt these activities. Churches, schools, and certain kinds of outdoor recreation are also usually considered noise sensitive.

a) **No Impact:** Appendix C of Title 20 of the Mendocino County Zoning Code provides exterior noise limit standards for various use types. Approval of this project would change the zoning from Rangeland to Upland Residential, but retain the primary uses of residential and agricultural, which allows for a maximum of 50 a-rated decibels (dBA). However, in the absence of an ambient noise study, this standard is more of a guideline. The low density allowed in the UR 40 district combined with the terrain and tree cover of the site will significantly mitigate any noise impacts associated with these uses, which are already expected to be minimal.

b) **No Impact:** No impacts related to groundborne vibration would occur as a result of project approval. Additional ministerial development beyond what is currently allowed would not result from project approval.

c) **No Impact:** The project site lies 0.75± miles northeast of the closest Ukiah Municipal Airport Compatibility Zone (Zone 6). No excessive noise related to airport usage would be expected to result from project approval.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have **NO IMPACT** on Noise.

5.14 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 (e.g., by proposing new homes and/or businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

DISCUSSION: The most recent census for Mendocino County was in 2020, with an estimated population of 87,497. The county has undergone cycles of population boom followed by periods of slower growth. For example, the county population increased by approximately 25 percent between 1950 and 1960, but barely grew from 1960 to 1970. Between 1990 and 2000, the population of Mendocino County increased 7.4 percent, a much slower rate of growth than the 20 percent increase from 1980 to 1990. Population growth slowed further from 2000 to 2007, increasing only 4.6 percent.

Mendocino County's Housing Element is designed to facilitate the development of housing adequate to meet the needs of all County residents. The Mendocino Council of Government's (MCOG) Regional Housing Needs Plan assigned the County a production goal of 1,845 housing unit for the unincorporated area between 2019 and 2027. Goals and policies were set forth in order to facilitate the development of these housing units at a range of sizes and types to address this need.

a) **No Impact:** The proposal to rezone and reclassify a 160 acre parcel from Rangeland to Upland Residential 40 acre minimums would allow, at maximum, development of an additional three legal parcels and as many new single-family residences, as well as accessory dwelling units or second residential units. A future subdivision to create three new buildable lots may increases minimal population growth in the immediate area as lots are sold and developed, but the overall low density and limited buildout available would keep these impacts to a less than significant level.

b) **No Impact:** One single family dwelling exists within the project site, and it's likely that this would remain following a possible future subdivision. No existing housing or housing entitlements would be lost by approval of the project.

MITIGATION MEASURES: None.

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

5.15 PUBLIC SERVICES

WOULD THE PROJECT result in substantial adverse Physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

DISCUSSION: The Mendocino County Office of Emergency Services (OES) is the primary local coordination agency for emergencies and disasters affecting residents, public infrastructure, and government operations in the Mendocino County Operational Area.

a-e) **No Impact:** Project approval would allow development of up to three additional parcels and seven dwelling units (including accessory dwelling units or second residential units), but this would not be immediate and would require approval of a subsequent discretionary project. The project site and larger region are within the service area of the Ukiah Valley Fire District, which provide structure protection, and CAL FIRE which provides wildland protection. Both the Vichy Springs Community Homes to the east and the Rogina Heights subdivision to the west are within the same service areas, and possible future development of the project site at a one dwelling unit per 40 acre density would be significantly less than the existing density of either of these developments. No increase to fire protection, police, schools, park, or other public facilities would be required by approval of this project.

MITIGATION MEASURES: None.

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

5.16 RECREATION

WOULD THE PROJECT:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

DISCUSSION: The County of Mendocino manages a variety of public recreation areas including the Low Gap Park in Ukiah, Bower Park in Gualala, Mill Creek Park in Talmage, Faulkner Park in Boonville, Indian Creek Park and Campground in Philo, and the Lion's Club Park in Redwood Valley, all of which are operated by the Mendocino County Cultural Services Agency. Additionally, the County is host to a variety of state parks, reserves, other state protected areas used for the purpose of recreation, with 13 located along the

coast and 8 located throughout inland Mendocino County. The closest protected area to the proposed project is the Mendocino National Forest, located 9± miles east of the subject parcel.

a) **No Impact:** The closest park facility to the project is Oak Manor Park, managed by the City of Ukiah, approximately one mile away directly. Oak Manor Park includes tennis courts, a play structure and green space available to the public. Other park facilities are available within the greater City and County region, including Todd Grove Park with swimming facilities, and Low Gap Park with established hiking trails and a disc golf course. Minor increased usage to some of these facilities may result from project approval and subsequent discretionary development, but the limitations of the Upland Residential district will keep the maximum density low and minimize impacts on park usage and infrastructure.

b) **No Impact:** Project approval would change the zoning and classification from Rangeland to Upland Residential and Remote Residential but would retain the primary residential and agricultural uses. No recreational facilities would be constructed or expanded as a result of the project.

MITIGATION MEASURES: None

FINDINGS: The proposed project would have **NO IMPACT** on Recreation.

5.17 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?	☐	☐	☐	☒
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

DISCUSSION: The site is currently developed with one single-family dwelling and can be expected to generate the average amount of trips associated with a residential use. Approval of the project would create the possibility of an additional three lots, each entitled to one single-family dwelling and one accessory dwelling unit. It is expected that construction of any project will result in a slight increase in traffic to and from the site, as construction workers arrive and leave the site at the beginning and end of the day, in addition to minor interruption of traffic on adjacent streets, when heavy equipment necessary for project construction is brought to and removed from the site. Once construction is complete, these workers would no longer be required at the site. The development allowed under the proposed land use and zoning would create only an incremental impact on traffic in the area, and would not be expected to significantly impact the capacity of the street system, level of service standards established by the County, or the overall effectiveness of the circulation system, nor substantially impact alternative transportation facilities, such as transit, bicycle, or pedestrian facilities, as a substantial increase in traffic trips or use of alternative transportation facilities is not anticipated. Future buildout of the site would require either a minor subdivision application or a use permit to create a dwelling group, both of which are discretionary approvals and would allow for additional review when more details regarding the proposed development are known.

a) **No Impact:** The project would not conflict with any existing transportation plan or policy addressing circulation. The Ukiah Valley provides several options for public transportation, although the Mendocino Transit Authority (MTA) does not currently have any bus stop locations east of US 101. Ride share and a la carte transportation options like Uber and LYFT are

available in the area and could provide options to future project site residents to reduce increased vehicle traffic for local trips. Bicycle travel would also be an option, but neither Vichy Springs Road nor Redemeyer Road currently feature bike lanes. Staff was unable to find any applicable policies in the Mendocino Council of Governments (MCOG) Regional Transportation Plan (RTP) that would apply to the proposed project.[7]

b) **No Impact:** MCOG developed a travel demand forecasting model in 2010, which estimates an addition of 7.6 new vehicle trips per day per each additional dwelling unit.[8] The 2018 Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA notes that projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact.[9]

c) **No Impact:** No changes to existing road infrastructure would occur as a result of project approval. The intersection of Vichy Springs Road and Redemeyer Road currently offers limited sightlines to the north, but this infrastructure was analyzed by the Vichy Springs Community Homes EIR and determined to be sufficient.[10]

d) **No Impact:** Existing public access on Redemeyer Road and Vichy Springs Road are well maintained and suitable for all emergency access vehicles. Should future development of the project site occur, private driveways would be required to meet engineering and safety requirements standards through the Mendocino County Department of Transportation and CAL FIRE.

MITIGATION MEASURES: None.

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

5.18 TRIBAL CULTURAL RESOURCES

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

[7] MCOG RTP 2022
[8] MCOG Travel Demand Forecasting Model, Page 43
[9] State of California. Governor's Office of Planning and Research. (2018). *Technical Advisory on Evaluating Transportation Impacts in CEQA.*
[10] Vichy Springs Community Homes Unit 3, Final EIR, Page 42

DISCUSSION: Public Resources Code Section 21074 defines Tribal cultural resources as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria.

The area known now as Mendocino County has a long history of occupation and use by Native American groups. Notably the Russian and Eel Rivers as well as other watercourses, valleys, and coastal areas provided rich and varied habitat for early human occupation. The first dated chronological periods and related cultural patterns within the region were developed by David A. Fredrickson in his 1973 Ph.D. dissertation[11] and 1984 regional synthesis.[12] This research provides a baseline archaeological information for the area, but there still remains significant gaps in archaeological data for the region that affects our understanding of regional cultural history.

From this understanding, ten (10) Native American tribes had territory within the County's current borders. The southern third of the County was the home Native Americans speaking the Central Pomo languages. To the north of the Central Pomo groups were the Northern Pomo, who controlled a strip of land extending from the coast to Clear Lake in Lake County. The Coast Yuki occupied a portion of the coast extending from Fort Bragg north to an area slightly north of Rockport. They were linguistically related to a small group, called the Huchnom, living along the South Eel River north of Potter Valley. Both of these smaller groups were related to the Yuki, who were centered in Round Valley. At the far northern end of the county, several groups extended south from Humboldt County. The territory of the Cahto was bounded by Branscomb, Laytonville, and Cummings. The North Fork Wailaki was almost entirely in Mendocino County, along the North Fork of the Eel River. Other groups in this area included the Shelter Cove Sinkyone, the Eel River, and the Pitch Wailaki.

a) **No Impact:** Consistent with SB 18, a request for consultation was submitted to the Native American Heritage Commission (NAHC) in July of 2025. The NAHC provided a list of interested tribes within the project area and subsequent notices were sent to all of these agencies. Only one, Robinson Rancheria, responded with a request for additional review and consultation, which was submitted on July 30th, 2025, approximately. No comment was ever received from the rancheria despite several outreach attempts by staff. While the project itself does not include ground disturbance, it would open the possibility of a minor subdivision to create up to three additional parcels. Each parcel would then be entitled to certain ministerial uses including residences and septic fields, which include ground disturbance. As part of the minor subdivision process, referrals would be made to the Northwest Information Center (NWIC) at Sonoma State for review of cultural resources. Based on the determination of NWIC and the Mendocino County Archaeological Commission, conditions related to protection of any cultural resources on site would be applied at the time of subdivision and may include anything from simple notifications (the "discovery clause") to restrictive building envelopes. Additionally, the Arch Resources chapter of the Mendocino County Code (Chapter 22.12) contains a provision for processing the unexpected location of resources, and provides some general protection regardless of project conditions.

MITIGATION MEASURES: None.

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

[11] Fredrickson, David, A. 1973. *Early Cultures of the North Coast of the North Coast Ranges, California,* UC Davis
[12] Fredrickson, David, A. 1984. *The North Coastal Region*, California Archaeology

5.19 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 stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

DISCUSSION: Public sewer systems in Mendocino County are provided by cities, special districts, and some private water purveyors. There are 13 major wastewater systems in the county, four of which primarily serve the incorporated cities, but also serve some unincorporated areas. Sewage collected by the Brooktrails Township Community Services District and Meadowbrook Manor Sanitation District is treated at the City of Willits Wastewater Treatment Plant. The City of Ukiah's Wastewater Treatment Plant also processes wastewater collected by the Ukiah Valley Sanitation District. Sewage disposal in the remainder of the county is generally handled by private onsite facilities, primarily septic tank and leach field systems, although alternative engineered wastewater systems may be used.

Solid waste management in Mendocino County has undergone a significant transformation from waste disposal in landfills supplemented by transfer stations to a focus on transfer stations and waste stream diversion. These changes have responded to rigorous water quality and environmental laws, particularly the California Integrated Waste Management Act of 1989 (AB 939). The Act required each city and county to divert 50 percent of its waste stream from landfill disposal by the year 2000 through source reduction, recycling, composting, and other programs. Chapter 3 (Development Element) of the Mendocino County General Plan (2009) notes there are no remaining operating landfills in Mendocino County, and as a result, solid waste generated within the County is exported for disposal to the Potrero Hills Landfill in Solano County. The Potrero Hills Landfill has a maximum permitted throughput of 4,330 tons per day and a remaining capacity of 13.872 million cubic yards and is estimated to remain in operation until February 2048.

Mendocino County's Development Goal DE-21 (Solid Waste) states: *Reduce solid waste sent to landfills by reducing waste, reusing materials, and recycling waste.* Solid Waste and Hazardous Waste and Material Management Policy DE-201 states the County's waste management plan *shall include programs to increase recycling and reuse of materials to reduce landfilled waste.* Mendocino County's Environmental Health Division regulates and inspects more than 50 solid waste facilities in Mendocino County, including: 5 closed/inactive municipal landfills, 3 wood-waste disposal sites, 2 composting facilities, and 11 transfer stations.

a) **No Impact:** The project site would remain residential and agricultural in use following project approval and would not require expansion of any facilities or services. The existing single family dwelling on the site is served by the Rogina Water Company for domestic water, and existing utilities for power and telecommunications. The site is not currently within the boundaries of a

wastewater treatment district and instead utilizes an on-site septic. The maximum buildout possible following project approval would result in a total of eight dwelling units (including accessory dwelling units or second residential units), which would all likely be served by the same districts and require on-site septic. Electrical utilities would be provided by PG&E using existing lines and new residential power drops, and no impacts would be expected to telecommunication facilities.

b) **No Impact:** Residential water services are provided to the site by Rogina Water Company. Future residential units would be required to obtain a 'will-serve' letter from the district to verify the ability to serve the new demand.

c) **No Impact:** The project site is not currently within boundaries of a wastewater or sanitation district. All future development would be required to design and install an on-site septic systems for wastewater disposal.

d) **No Impact:** The closest solid waste facility to the site is the Ukiah Transfer Station, approximately 3.3 miles southwest of the project site. Solid waste from the UTS is then transported to the Potrero Hills Landfill in Suisun City, Solano County, with an estimated operating range of an additional 24 years, until 2048. The Phase II expansion plan in mid 2010's was estimated to add an additional 35 years of operational life to the facility and 61.6 million cubic yards of disposal capacity.[13] Residential uses can be estimated to produce 12.23 pounds of solid waste per household per day.[14] At full buildout following a subsequent subdivision the total additional output of solid waste would be 85.61 pounds per day. Currently, the daily input of the Potrero Hills Landfill is 4,330 tons per day and the landfill harvests gas emissions as a renewable energy resource, providing 40% of the power for homes in Suisun City. The project site would also be eligible for nonresidential, agricultural uses, which would additionally limit the increased amount of solid waste produced. The low development density of the UR 40 district would effectively limit any increase in household solid waste to less than significant levels.

e) **No Impact:** All future development would be required to conform to Federal, State and local requirements for management of solid wastes, including MendoRecycle, Mendocino County Code Title 9A, the US Resource Conservation and Recovery Act (RCRA) and CalRecycle.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have **NO IMPACT** on Utilities and Service Systems.

5.20 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) Impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate	☐	☐	☐	☒

[13] Potrero Hills Landfill Order

[14] City of Los Angeles (2006). *L.A. CEQA Thresholds Guide*. Retrieved from https://planning.lacity.org/.

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
fire risk or that may result in temporary or ongoing impacts to the environment?				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage challenges?	☐	☐	☐	☒

DISCUSSION: The County of Mendocino County adopted a Mendocino County Operational Area Emergency Operations Plan (County EOP) on September 13, 2016, under Resolution Number 16-119. As noted on the County's website, the County EOP, which complies with local ordinances, state law, and stated and federal emergency planning guidance, serves as the primary guide for coordinating and responding to all emergencies and disasters within the County. The purpose of the County EOP is to "facilitate multi-agency and multi-jurisdictional coordination during emergency operations, particularly between Mendocino County, local and tribal governments, special districts as well as state and Federal agencies" (County of Mendocino – Plans and Publications, 2019). In July 2020, an annex to the EOP was incorporated to include the Mendocino County Evacuation Plan, which provides both a summary and detailed version of evacuation and repopulation procedures in the event of a major disaster.

The Mendocino County Community Wildfire Protection Plan (CWPP), updated in May of 2025, was developed through a collaborative effort by a core team comprised of federal, state, and local agencies, organizations, tribal representatives, and residents. It offers a comprehensive hazard assessment, project recommendations, and background information on the community's wildland fire environment, including relevant land management plans and agencies. The primary objective of this CWPP is to enhance local communities' wildfire mitigation capacity by facilitating collaboration with government agencies. This collaboration aims to identify high-risk areas and prioritize efforts in mitigation, fire suppression, and emergency preparedness. Additionally, the CWPP seeks to increase public awareness regarding both natural and human-caused wildland fire risks to lives, safety, and the local economy.

Public Resources Code (PRC) §4201-4204 and Government Code 51175-89 direct the California Department of Forestry and Fire Protection (CAL FIRE) to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These zones, referred to as Fire Hazard Severity Zones (FHSZ), define the application of various mitigation strategies to reduce risk associated with wildland fires. CAL FIRE is remapping Fire Hazard Severity Zones (FHSZ) for State Responsibility Areas (SRA) and Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Areas (LRA) to provide updated map zones, based on new data, science, and technology. This specific dataset provides DRAFT boundaries for Very High FHSZs within LRA lands. Since these zones were the result of a model that considers influence of fire behavior and embers from adjacent lands, zones for SRA and FRA lands are included to assist in understanding the hazard zoning on LRA lands.

a) **No Impact:** The subject parcel is within Planning Area 2 as specified in the Evacuation Plan. The project proposes only reclassification of the existing general plan and zoning districts and would incur no additional development or physical impact. Approval of the project within the proposed scope would not have any impacts on emergency access or evacuations.

b) **No Impact:** Any rural development in California now poses some unmitigable degree of fire hazard risk due to increasing density of development and climate change. Future development of the project site would see a slight increase in allowed development density, from one dwelling unit per 160 acres to one dwelling unit per 40 acres -a fourfold increase- but still a sufficiently low density to mitigate impacts to residential development in the immediate area. Future building sites would be required to conform to Public Resources Code section 4290 clearance standards for defensible space, and the project site offers a variety of building locations where a dwelling may be sited to maximize its defensibility. No atmospheric studies that would provide information on wind patterns in the region exist, but it can be assumed that

wind-related particulate impacts would not be significantly different at the project site than at neighboring developments.

c) **No Impact:** Potential future development of additional homesite following either a minor subdivision or a use permit for a dwelling group would require installation of additional essential infrastructure, including access roads, water district connections and septic and leach systems. These would result in negligible and temporary impacts to the environment during construction phases. It's possible that future property owners may elect to create firebreaks along ridges and through vegetation to help slow the advance of wildfire. This work would require a grading permit at minimum and be required to conforming to existing regulations within Title 18 of the Mendocino County Code. None of this work would contribute to wildfire risks to property owners within or adjacent to the site.

d) **No Impact:** Two unnamed watercourses traverse the property along the northern boundary and western boundary, and connect to Sulfur Creek approximately 1800 feet from the edge of the property. Sulfur Creek then feeds into the Russian River about 2000 feet farther downstream. There is no development along Sulfur Creek between the project site and the Russian River that would be affected by flooding or landslide. Additional runoff as a result of post-fire erosion would likely be contained within the project site, with a negligible impact downstream.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have **NO IMPACT** on Wildfire.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

- Substantially degrade environmental quality;
- Substantially reduce fish or wildlife habitat;
- Cause a fish or wildlife population to fall below self-sustaining levels;
- Threaten to eliminate a plant or animal community;
- Reduce the numbers or range of a rare, threatened, or endangered species;
- Eliminate important examples of the major periods of California history or pre-history;

- Achieve short term goals to the disadvantage of long term goals;
- Have environmental effects that will directly or indirectly cause substantial adverse effects on human beings; or
- Have possible environmental effects that are individually limited but cumulatively considerable when viewed in connection with past, current, and reasonably anticipated future projects.

a) **No Impact:** The proposed project to rezone and reclassify 160 acres from Rangeland to Upland Residential 40 acres would not have a significant impact on the environment. The project itself would incur zero impacts, but would create a future possibility of additional development, either through land division and development or with a use permit and dwelling group to reach the maximum allowed density of four dwelling units and additional ADUs. No impacts to fish or wildlife populations, endangered or otherwise, are anticipated as a result of project approval.

b) **No Impact:** Cumulative impacts associated with the project approval would be only those associated with a future discretionary project allowing development of additional dwelling units. Impacts associated with these possible future dwelling units would include those customarily associated with residential uses, including water, transportation, GHG emissions, energy, population and housing, and wildfire. Due to the low development density allowed under the proposed zoning, these impacts would be limited to a negligible amount. Even when viewing this proposal together with nearby residential developments, the overall impacts of adding up to seven additional dwelling units do not meet thresholds for significance.

c) **No Impact:** No substantial adverse impacts on human beings are expected from the project. Impacts associated with future development would likely be limited to those associated with residential or agricultural uses. Of those, the ones most likely to affect humans would be related to GHG emissions and their effect on global climate. Transportation and GHG impact analysis is an evolving science, but even at maximum buildout the impact of the project would be negligible. A future subdivision or use permit approving such development would also require environmental review and possible mitigation, and it's possible that environmental science may have established a more effective analysis and mitigation process at that uncertain future date.

MITIGATION MEASURES: None

FINDINGS: The proposed project would have **NO IMPACT** on Mandatory Findings of Significance.