PUBLIC DRAFT

INITIAL STUDY AND NEGATIVE DECLARATION

SCH: XXXXXX

FOR

MENDOCINO FOREST PRODUCTS CO., LLC COASTAL DEVELOPMENT USE PERMIT AT 32600 HOLQUIST LANE, FORT BRAGG; APN: 017-261-33, 34, 35

File No. U_2024-0007

LEAD AGENCY:
County of Mendocino
Department of Planning & Building Services
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October 20, 2025

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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 Negative Declaration (ND) to establish *General Industrial* uses on the site to include storage of materials (culverts, bridges, road surfacing materials), permit vehicle/heavy equipment storage and servicing of heavy equipment used in forestry operations, and 2) remove the unpermitted placement of asphalt grindings on an existing interior road system, request after-the-fact approval for the construction of a fire suppression training facility (tower), placement of a storage container, and installation of a structure used as an office building in association with *Automotive and Equipment: Fleet Storage* activity on the site, and obtain approval for fleet storage uses, all located at 32600 Holquist Lane, Fort Bragg, APNs 017-261-33, 34, 35 (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 a written 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: U_2024-0007

OWNER/APPLICANT: Mendocino Forest Products Company, LLC
PO Box 996
Ukiah, CA 95482

AGENT: Wynn Coastal Planning & Biology – Amy Wynn
703 N. Main Street
Fort Bragg, CA 95437

PROJECT LOCATION: In the Coastal Zone, 1.2± miles northeast of the community of Caspar on the north side of Holquist Lane (CR 412) at its intersection with Gibney Lane (CR 412-E) at 32600 Holquist Lane, Fort Bragg. APNs: 017-261-33, 34, 35.

TOTAL ACREAGE: 36.8± Acres

GENERAL PLAN: Coastal Industrial (I)

ZONING: Coastal Industrial (I)

PROJECT DESCRIPTION: Pursuant to CEQA Guidelines Section 15125, the Project Description is required to identify the existing baseline physical conditions. For this project, the baseline conditions include all existing development and the current parcel configuration. The applicant requests to establish a number of uses on the site, including storage of materials related to off-site forestry operations including steel railcar bridges, timbers for maintenance and shoring, fencing materials including t-posts and wire, steel culverts of varying sizes and lengths, and trailers maintained in dead storage. Additionally, a portion of the project site will be used for parking and storage of vehicles related to forestry operations including heavy equipment, and an existing shop will be used for maintenance of said vehicles. The application also seeks to remedy several existing code violations, including the removal of asphalt grindings that have been placed over the interior road system, the legalization of an unpermitted mobile office building, and after-the-fact approval of a fire suppression training structure constructed on the site in 2022.

The project site is located within the regulatory coastal zone, less than 1 mile from the Pacific Ocean in an existing cleared and developed area adjacent to residential uses and timber stands.



Fig. 1: Historic use of the project site by the Aborigine Lumber Company mill, 1955, looking toward the east

The site was previously the location of the Aborigine Lumber Company mill, which operated for 50 years from 1955 until 2005 (Fig. 1 [1]). Mill operations included the processing of lumber products from raw timber (logs) and operated on a 24 hour schedule for many years. Following a downturn in the timber economy, the mill was finally closed and dismantled in 2005. Local contamination of soils due to decades of industrial

[1] Roots of Motive Power Newsletter, Vol. 24 No. 1, April 2007

use has occurred, though some steps have been taken to mitigate those issues. Bromley Creek, a riparian stream corridor crosses the property from the southeast to the northwest with a large pond near the center of the site. The only remaining development on the site is a large shop building used for vehicle maintenance, ATV storage, and cold storage for seedlings, a fueling station enclosure, an 8x8 foot power junction shed, and a pump house. A 44 foot tall fire suppression training tower and storage container have been installed on the site without the benefit of permits, as well as a mobile office building used in conjunction with a commercial business using a portion of the site for fleet storage, and the project proposes to legalize these structures after-the-fact.



Fig. 2: The existing but unpermitted 44-foot tall fire training structure.

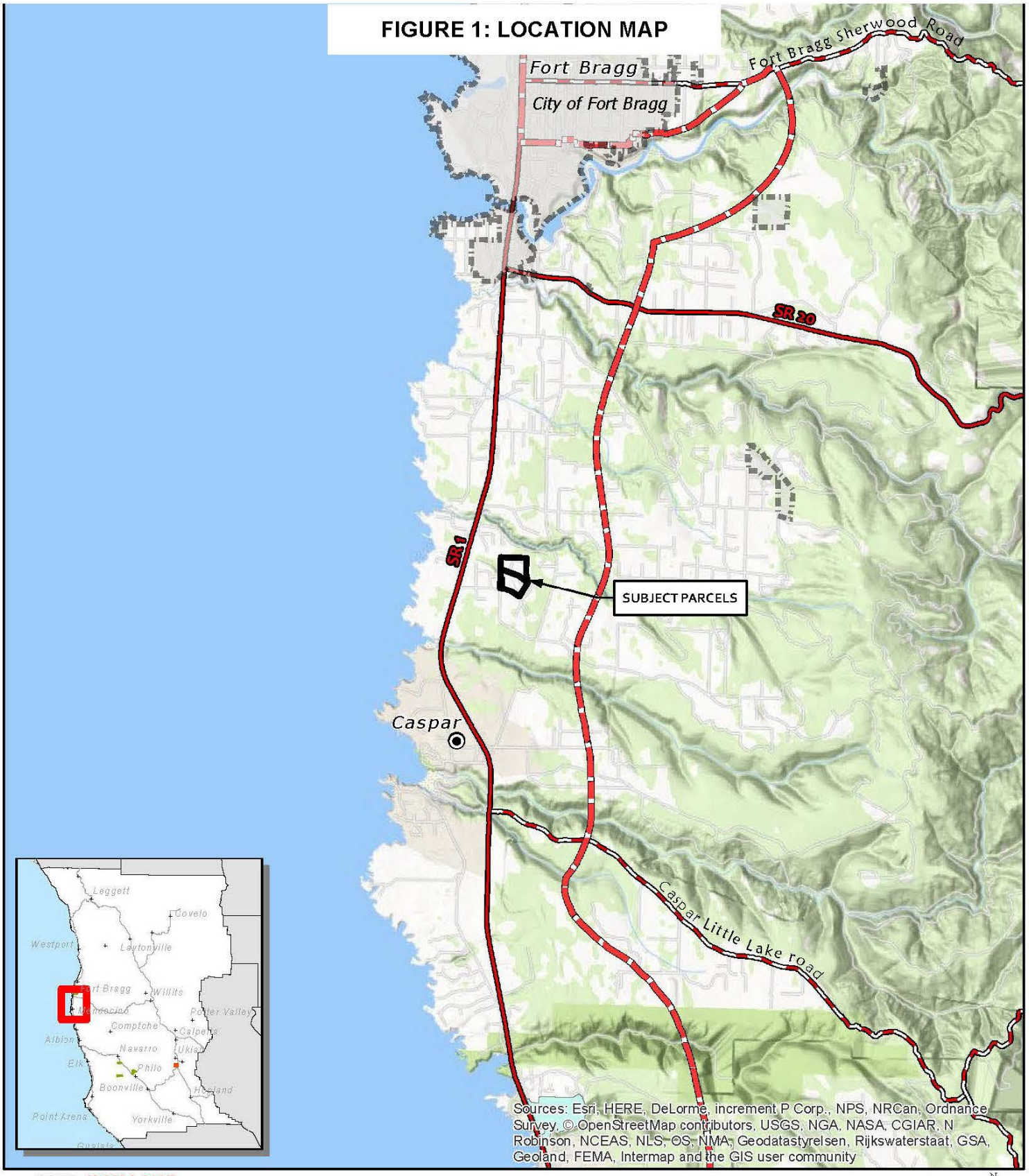
The site has many large areas cleared of vegetation due to its previous industrial use, and an interior road network is present to provide access, including several culverts where the roads cross Bromley Creek. In 2023, asphalt grindings were applied over the roadway without permits and the project also proposes removal of these grindings. A number of trees were removed from the site in early 2024, including 8 eucalyptus trees and 15 alder trees adjacent to existing roadways.

Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements): None.

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. The following tribes were notified: Cloverdale Rancheria, Cahto Tribe, Redwood Valley Rancheria, Sherwood Valley Band of Pomo Indians, and the Round Valley Tribe. As of the date of this report, no responses have been received from any tribal agency or representative.

PROJECT PLOT PLAN: See Page 6 of this document.

FIGURE 1: LOCATION MAP



CASE: U 2024-0007
OWNER: Mendocino Forest Products
APN: 017-261-33. 34 & 35
APLCT: Mendocino Forest Products
AGENT: Wynn Costal Planning
ADDRESS: 32600 Holquist Ln., Fort Bragg

Major Towns & Places
City Limits
Coastal Zone Boundary
Highways
Major Roads

0 2,800 5,600 Feet
0 0.5 1 Miles
1:63,360

LOCATION

THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.

FIGURE 2: AERIAL IMAGERY



PROJECT: U 2024-0007
OWNER: Mendocino Forest Products (MFP)
APN: 017-261-33, 34, 35
APLCT: Mendocino Forest Products
AGENT: Wynn Coastal Planning & Biology
ADDRESS: 32600 Holquist Lane, Fort Bragg

Public Roads

REVISED SITE MAP

N
W E
S

Lands of Mendocino Forest Products Company, LLC
Section 31, Township 18 North,
Range 17 West, Mount Diablo Meridian
Mendocino County, CA

FIGURE 3: PLOT PLAN

General Notes

Proposed Land Use:	Use Permit for the Following: Forest Production & Processing: General Automotive & Equipment: Fleet Storage Fire and Police Protection Services
General Plan Designation:	Industrial:R
Zoning District:	Industrial 40k - 40k sf minimum lot size (w/o water/sewer)
Entitlement Permit Type:	CUP
Appealable to Coastal Commission:	Yes
Corridor Preservation Setback:	25'
Highly Scenic Area:	No
Height Limit:	50'
Yard Setbacks:	5' sides, 10' front & 20' rear
CalFire Setbacks:	30'
Environmental Constraints:	Yes
Potential Geologic Hazards:	No
Water Source:	On-site well (decommissioned)
Wastewater Disposal:	On-site septic (decommissioned)

Lot Coverage Tabulation Gross Site Area (APN: 017-261-34):

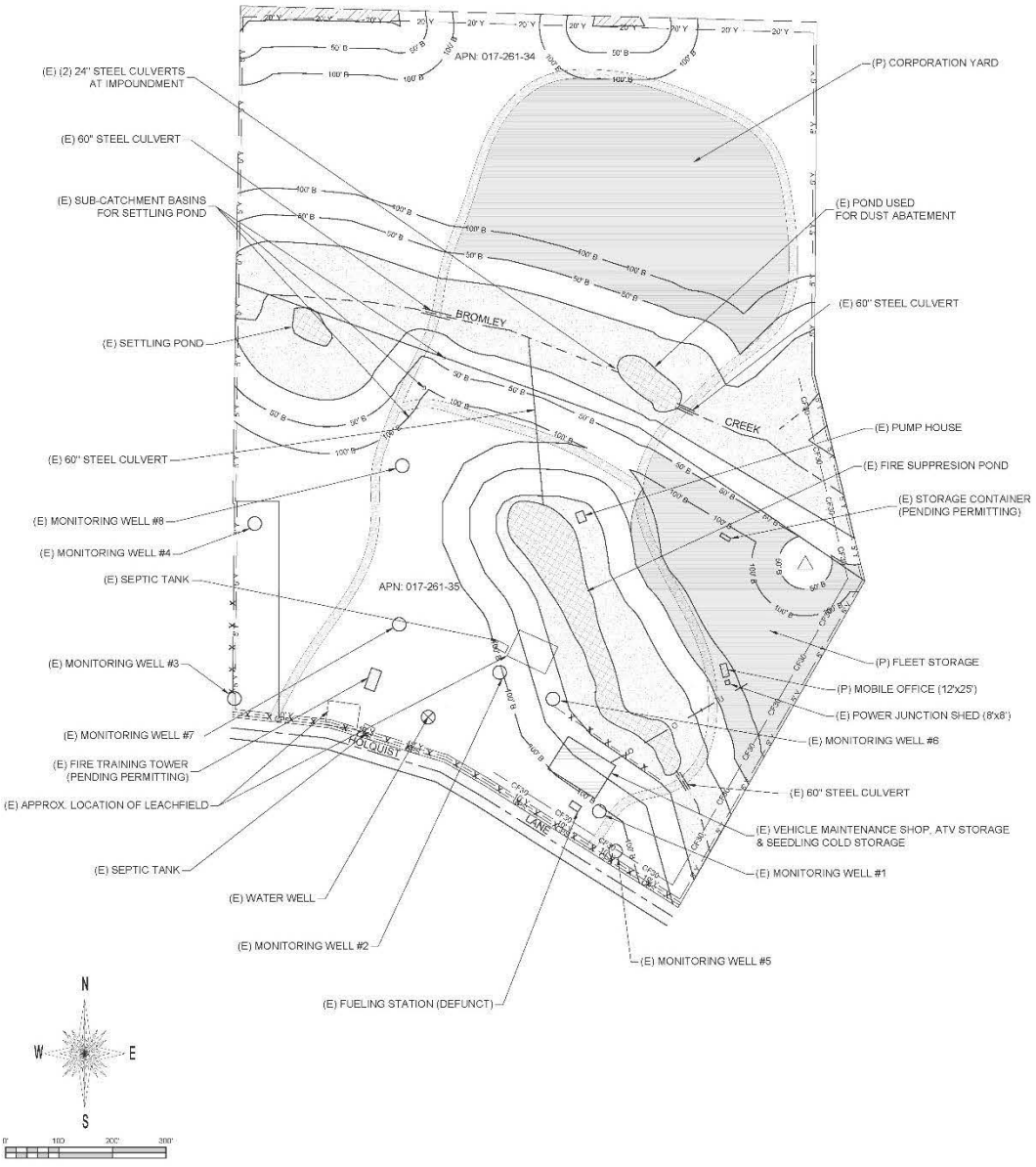
Gross Site Area:	18.20 ac (792,792 sf)
Maximum allowable lot coverage:	n/a

Lot Coverage Tabulation Gross Site Area (APN: 017-261-35):

Gross Site Area:	17.90 ac (779,723 sf)
Maximum allowable lot coverage:	n/a

LEGEND:

- POND
- STREAM
- RIPARIAN ESHA
- GRAND FIR ESHA
- PYGMY CYPRESSES
- 50' ESHA BUFFER
- 100' ESHA BUFFER
- (E) CHAIN LINK FENCE
- (E) UNDERGROUND POWER
- (E) OVERHEAD POWER
- (P) TIMBERLAND MANAGEMENT SUPPORT OPERATIONS (SEE APPLICATION FOR DETAILS)



SITE PLAN 1 : 100 1

SHEET 1 OF 1 SHEETS

REVISION	BY	DATE

APN: 017-261-34-00 & 017-261-35-00
DRAWN BY:
DATE:
SCALE: AS SHOWN
APPROVED BY:

Mendocino Forest Products Company, LLC
32600 Holquist Lane
Fort Bragg, CA 95437

Wynn COASTAL PLANNING & BIOLOGY
703 North Main Street, Fort Bragg, CA 95437
ph: 707-964-2537 fx: 707-964-2622 www.WCPlan.com

Design review, not meant for construction. Site Plan not a result of Professional Land Surveyor data, verify data in field.

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	December 10, 2025
Signature	Date
Russ Ford	Senior Planner
Printed Name	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: As noted in Chapter 4 (Resource Management Element) of the Mendocino County General Plan (August 2009), the County of Mendocino (County) is a predominately rural county, with most of the land in forest or agricultural production, both of which are considered open spaces that add to the quality of life of the County's residents and attract tourists. Chapter 3.5 of the Coastal Element provides that the "*… Mendocino coast includes beaches, dunes, high bluffs, seastacks, jutting headlands, wetlands, heavily wooded gulches, grassy upland terraces, pygmy forests, serene river estuaries and rocky streams. Several 19th century villages, each with a distinct character, complement the natural landscape. The beauty and accessibility of the Mendocino coast have made it a heavily used tourist and recreational area. The Mendocino coast attracts people to sightsee. Scenic resources are the basis of the coast's tourist and retirement economies as well as a source of continuing pleasure for residents.*

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.*"

Policy 3.5-15 of the Coastal Element of the Mendocino County General Plan provides in part that "*Security lighting and floodlighting for occasional and/or emergency use shall be permitted in all areas. Minor additions to existing nightlighting for safety purposes shall be exempt from a coastal permit. In any event no lights shall be installed so that they distract motorists and they shall be shielded so that they do not shine or glare beyond the limits of the parcel wherever possible.*"

a) **No Impact:** The most significant views in the area are based on the Pacific Ocean coastline and its associated natural environment, including forests and woodlands. The project site is bordered by wooded areas to the north and east, and low density development on remaining sides. The project does not propose construction of new structures but does include permitting several existing structures, and would allow for new storage of materials including metal 'railcar' bridges, culverts, materials used in road surfacing, and heavy equipment associated with these uses. Currently the site is largely vacant so the addition of these items would result in aesthetic changes to the site itself, but would not have a substantial impact on any coastal-related scenic vista. The proposed location of materials storage and fleet storage would not be visible from public access points along Holquist Lane.

b) **No Impact:** State Route 1 is located 0.34± miles west of the project site and is considered eligible for inclusion as a State Scenic Highway[2] but has not yet been officially included. There is currently no adopted Corridor Protection Plan for this portion of SR 1, nor are there trees, rock outcroppings, historic buildings or other scenic resources on the site that would be considered to be contributing to scenic resources.

c) **No Impact:** The project site is not located within an Urban Cluster, as defined by the United States Census Bureau[3]. Public views of the site are provided along the southern boundary from Holquist Lane, a County road. Proposed additions to the site would include materials storage in the corporation yard and fleet storage of equipment and vehicles in several areas around the property, all of which are screened by several rows of trees and vegetation. The vehicle maintenance shop that would be used for manufacturing is visible from public areas, but is existing with no changes proposed. The fire tower is existing but unpermitted, and is also visible from Holquist Lane. The tower consists of storage containers and scaffolding/ladders, which are consistent with the industrial character of the of maintenance shop.

d) **Less Than Significant:** The existing maintenance shop includes exterior incandescent lights typical for its age of construction. No additions to that structure are proposed. The training tower includes flood lights at the top of the tower that are used only during training activities when necessary during low-light conditions and would be of a temporary nature. The exterior of both structures are metal with dark paint or matte finishes that will not contribute to daytime glare.

MITIGATION MEASURES: None.

[2] https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa
[3] https://www.arcgis.com/home/item.html?id=10551da8fcd24062b1857473252b3df8

FINDINGS: The proposed project would have **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:** Per the latest FMMP data[4], the majority (93%) of the project site is classified as *Vacant or Disturbed Land (V)* with the balance classified as *Urban and Built-Up Land (D)*. Approval of the project would not result in the conversion of Prime, Unique, or Farmland of Statewide Importance.

[4] Farmland Classifications map

b) **No Impact:** The project site is zoned Coastal Industrial (I), which is consistent with its historical use for forest production and processing as a lumber mill. *Forest Production and Processing: General* is considered an agricultural use and is conditionally permitted within the Coastal Industrial zone. However, the Coastal Industrial zoning is not compatible with the Williamson Act, so no conflicts with either the Act or agricultural zonings would occur.

c) **No Impact:** "Forest Land" consists of land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.[5] "Timberland" means land which is available for and capable of growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Based on the previous heavy industrial use of the property and the extensive clearing, the current site would not be suitable for either management or cultivation of timber resources, and so would not meet the definition of either Forest Land or Timberland. As discussed in section b) above, the project site is zoned Coastal Industrial (I) and not designated as a Timberland Production Zone.

d) **No Impact:** As discussed in section c) above, the site does not meet the definition of Forest Land per Public Resources Code ("PRC") §12220(g) and would therefore not result in impacts to or conversion of forest land.

e) **No Impact:** The project is not located within proximity to lands that would be considered farmland per PRC §12220(g). The project site is surrounded on all sides by low density residential development on lots from 1 to 20 acres in size. The majority of these sites are classified *Urban and Built-Up Land* by the FMMP, with areas of *Grazing Land* interspersed. Operation of the project would entail mostly storage of forestry related equipment and materials and would not alter the use or development of the site from its current condition. Existing lands in the vicinity of the project that may be eligible for agricultural uses would be unaffected by project approval.

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. Mendocino County Air Quality Management District (MCAQMD) is responsible for enforcing the state and federal Clean Air Act, as well as local air quality regulations. Air Districts in California develop regulations based on the measures

[5] https://codes.findlaw.com/ca/public-resources-code/prc-sect-12220/

identified in the Clean Air Act and its Clean Air plan as well as state regulations. MCAQMD operates air monitoring stations in Fort Bragg, Ukiah, and Willits. In Mendocino County, these are known as the district "Rules and Regulations". These regulations establish the procedure for new point source emissions to obtain an air quality permit, air quality standards for new construction, and others. In 2005, MCAQMD adopted a Particulate Matter Attainment Plan which quantified past and present Particulate Matter levels and recommended control measures to reduce emissions. These control measures were incorporated into the District Rules and Regulations.

MCAQMD Rule 1-400 states: "*A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or that endanger the comfort, repose, health or safety of any such persons or the public or that cause or have a natural tendency to cause injury or damage to business or property.*"

MCAQMD 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.

The California Air Resources Board (CARB) makes State area designations for ten criteria pollutants: ozone, suspended particulate matter (PM_{10}), fine suspended particulate matter ($PM_{2.5}$), carbon monoxide, nitrogen dioxide, sulfur dioxide, sulfates, lead, hydrogen sulfide, and visibility reducing particles. In contrast to the State area designations, the U.S. Environmental Protection Agency (EPA) makes national area

designations for six criteria pollutants: ozone, PM_{10}, $PM_{2.5}$, carbon monoxide, nitrogen dioxide, and sulfur dioxide. With the exception of Hydrogen Sulfide and Visibility Reducing Particles, the County is in attainment for all criteria pollutants that are designated for the State and National standards. [6] The County achieved attainment in 2021. [7] The Hydrogen Sulfide and Visibility Reducing Particles designations remain unclassified in Mendocino County.

For the purposes of CEQA, MCAQMD previously recommended that agencies use adopted Bay Area Air Quality Management District (BAAQMD) thresholds for projects in Mendocino County. However, MCAQMD has issued clarifications to resolve conflicts between District rules and BAAQMD thresholds. This includes the Indirect Source Rule, Stationary Source Emissions Levels, CO Standards, Greenhouse Gas rules, Risk Exposure, and Odor rule. More information can be found on the MCAQMD website. [8]

Mendocino County General Plan Policy RM-37, RM-38, and RM-49 relate to Air Quality. [9]

Per California Health and Safety Code (HSC) Section 42705.5, "sensitive receptors" include hospitals, schools, day care centers, and other locations that the district or state board may determine. According to the California Air Resources Board (CARB), sensitive receptors include *"children, elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. The locations where these sensitive receptors congregate are considered sensitive receptor locations. Sensitive receptor locations may include hospitals, schools, and day care centers."*

Mendocino County also contains areas where naturally occurring asbestos (NOA) is known to occur. When asbestos fibers are disturbed, such as by grading and construction activities, the fibers can be released into the air. These fibers can cause serious health threats if inhaled. Ultramafic rocks are an indicator of possible asbestos minerals, including a rock known as serpentine. Serpentine and ultramafic rocks are common in the eastern belt of the Franciscan Formation in Mendocino County. Planning & Building Services uses a map derived from the California Bureau of Mines and Geology and the US Department of Agriculture's Natural Resource Conservation Service (NRCS) to identify areas likely to have asbestos containing geologic features. MCAQMD has adopted policies for areas containing NOA. For projects in areas identified as potentially containing NOA, the District requires an evaluation and report by a State registered geologist to determine that any observed NOA is below levels of regulatory concern in the areas being disturbed. If it is determined that NOA is present at levels above regulatory concern, or the applicant chooses not to have the testing and evaluation conducted, MCAQMD requires that certain measures be implemented in accordance with Title 17 California Code of Regulations Section 93105. [10]

a) **Less Than Significant:** The project could potentially result in increased emissions of fugitive dust due to construction equipment and activities within the project site, which is mostly gravel, soil, and grasses. Existing regulations from MCAQMD regulating dust emissions are expected to be sufficient to minimize impacts.

b) **Less Than Significant:** Mendocino County is in attainment with all Federal and State pollution standards. As some of the project site is unpaved and could potentially result in the generation of additional amounts of PM10 fugitive dust, a Condition of Approval requiring compliance with MCAQMD regulations for control of dust emissions is recommended.

c) **Less Than Significant:** Sensitive receptors can include children, the elderly, and others with existing respiratory conditions that may be at increased risk of negative health outcomes due to exposure to air pollution. [11] The project site is located immediately adjacent to areas of low and medium density residential development, where sensitive receptors may exist. The project

[6] California Air Resources Board . State and Federal Area Designations. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed December 2025.
[7] California Air Resources Board (2022). *2021 Amendments to Area Designations for State Ambient Air Quality Standards.* Retrieved from https://ww2.arb.ca.gov/rulemaking.
[8] Mendocino County Air Quality Management District (2013). *District Interim CEQA Criteria and GHG Pollutant Thresholds.* Retrieved from https://www.co.mendocino.ca.us/aqmd/.
[9] County of Mendocino (2009). *General Plan.* Retrieved from https://www.mendocinocounty.org/government/planning-building-services/plans/mendocino-county-general-plan.
[10] Mendocino County Air Quality Management District (2013). *Policies for Areas Containing Naturally Occurring Asbestos (NOA).* Retrieved from https://www.co.mendocino.ca.us/aqmd
[11] https://ww2.arb.ca.gov/capp/cst/rdi/sensitive-receptor-assessment

proposes storage of forestry related equipment and materials, and periodic use of a fire training facility. None of these uses would contribute to additional odor or pollutant concentrations with the possible exception of fumes related to diesel engines. The applicant estimates as many as 6 trips annually to bring culverts and materials onto the site for storage using large trucks and trailers. Additional trips would be required for subsequent transport of these materials to off-site forestry operations using smaller commercial pickups and trailers. Additional incidental operation of diesel powered forestry equipment such as tractors, loaders, and skidders would increase diesel emissions in the immediate environment over the current baseline. In 1998, California identified diesel particulate matter as a toxic air contaminant (TAC) based on its potential to cause cancer. [12] A safety threshold for general exposure to diesel particulate matter (DPM) has not been established, but the Mine Safety and Health Administration (MSHA) has set a permissible exposure limit (PEL) for DPM at 160 micrograms per cubic meter of total carbon (TC). [13] Emission amounts can vary significantly by engine type, age, fuels, distance to engines, and operating time. The California Air Resources Board's (CARB) analysis shows average outdoor (ambient) exposures to be in a range from 0.2 to 3.6 micrograms per cubic meter, which is far below the OSHA safety threshold. Given the intermittent use of the diesel engines in an open-air environment, the impacts related to DPM emissions generated by the project would be less than significant on any sensitive or non-sensitive receptor in proximity to the project site.

d) **No Impact:** The project proposes storage of forestry related equipment and materials, possible limited modifications to prepare the materials for use off-site, and periodic use of a fire training facility. Aside from incidental emission of diesel particulate matter (discussed in section c) above), no additional emissions, including odor producing compounds, are anticipated from project operation.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have a **LESS THAN SIGNFICANT 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?	☐	☐	☐	☒

[12] California Air Resources Board – Summary: Diesel Particulate Matter Health Impacts, retrieved August 1, 2025
[13] OSHA.gov

WOULD THE PROJECT:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

DISCUSSION: 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.*

Chapter 3.1 of the Coastal Element of the General Plan provides Policies regarding Habitats and Natural Resources. Coastal Element Policy 3.1-2 requires that *Development proposals in environmentally sensitive habitat areas such as wetlands, riparian zones on streams or sensitive plan or wildlife habitats (all exclusive of buffer zones) including, but not limited to those shown on the Land Use Maps, shall be subject to special review to determine the current extent of the sensitive resource.*

Environmentally Sensitive Habitat Areas are defined in Chapter 3.1 of the Coastal Element of the General Plan as *Any areas in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments*. In Mendocino County, environmentally sensitive habitat areas include: anadromous fish streams, sand dunes, rookeries and marine mammal haulout areas, wetlands, riparian areas, pygmy vegetation containing species of rare or endangered plants, and habitats of rare and endangered plants and animals. In addition, several state agencies and private environmental groups and Local Citizens Advisory Committees have identified certain resource areas which require protection. These resource areas include State Parks and Reserves, Underwater Parks and Reserves, Areas of Special Biological Significance, Natural Areas, Special Treatment Areas (designated by California Division of Forestry), Fishing Access Points, Areas of Special Biological Importance, Significant California Ecosystems, and Coastal Marine Ecosystems.

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) **Less Than Significant:** A Biological Scoping Report ("bio") was prepared for the project on October 17, 2024 by Wynn Coastal Planning & Biology (WCPB). The report identified only one sensitive species within the project area -a single location of Mendocino cypress and Bolander pine trees- which would be considered an Environmentally Sensitive Habitat Area (ESHA). Instances of Grand fir forest were also located in a few locations at the perimeter of the project parcel. The Mendocino County Local Coastal Program (LCP) requires a minimum 100-foot buffer from the edge of all extant ESHAs unless a reduced buffer is supported by analysis from a professional biologist and approved by CDFW staff. The bio report includes a reduced buffer analysis that supports reduction to 50 feet, and CDFW staff responded on June 6, 2025 in support of the findings in the report, and recommended incorporation of the proposed avoidance measures.

b) **No Impact:** As noted in the WCPB bio report, Bromley Creek traverses the project site from east to west, flowing toward the Pacific Ocean. The bio report identifies significant areas of riparian and wetland habitats adjacent to both Bromley Creek and the existing fire suppression pond on the southern portion of the parcel. Wetland and riparian areas are considered ESHAs in the LCP, and are afforded 100-foot buffers that prohibit development. As noted in item a) above, the bio report includes a reduced buffer analysis that supports the reduction of these buffer areas to 50 feet.

c) **Less Than Significant:** As noted in the WCPB bio report, Bromley Creek traverses the project site from east to west, flowing toward the Pacific Ocean. The bio report identifies significant areas of riparian and wetland habitats adjacent to both Bromley Creek and the existing fire suppression pond on the southern portion of the parcel. Wetland and riparian areas are considered ESHAs in the LCP, and are afforded 100-foot buffers that prohibit development. As noted in item a) above, the bio report includes a reduced buffer analysis that supports the reduction of these buffer areas to 50 feet.

d) **No Impact:** The bio report identifies Bromley Creek as a Class II (non-fish bearing) watercourse, which is in alignment with CDFW data showing no habitat associations for Coho Salmon or Steelhead [14]. The report does not identify any endangered mammal species within the project area, or associations with neighboring lands that would constitute a wildlife corridor or wildlife nursery site. The project proposes only continued use of the existing structures, and the new allowance of material and vehicle storage related to forestry operations and road maintenance on existing disturbed areas of the property. The majority of the site will remain undeveloped and would not significantly interfere with wildlife activity.

e) **Less Than Significant:** Increased use of the site for materials storage should be reviewed primarily for any potential conflicts with policies related to protection of Environmentally Sensitive Habitat Areas (ESHA), but the proposed project does not conflict with any local policies or ordinances protecting biological resources. As discussed above, the bio report identified a few areas within the project site that would be classified as ESHA and afforded additional protection, including development buffers. However, the report also provides a reduced buffer analysis consistent with MCC 20.532.060 stating that reducing the buffer zones to 50-feet will not have an impact on any of the identified ESHA. This RBA was reviewed and

[14] CDFW BIOS map viewer

supported by CDFW biological staff. Additional avoidance measures are specified in the report which are included as recommended conditions of approval.

Division II of the Mendocino County Zoning code regulates the removal of 'major vegetation', which consists of one or more of the following:

- The removal of more than 15 trees or 10% of the total number of trees on the parcel (whichever is less) with a diameter of 12 inches or a circumference of 38 inches or more measured at 4½ feet vertically above the ground.
- The removal of trees within a total contiguous ground area of 6,000 square feet, or within a noncontiguous area not exceeding a total of 6,000 square feet of total canopy area.
- Any tree removal that would result in a significant impact as determined by the Planning Director.

In March 2024, a complaint was filed on the property alleging removal of vegetation and excavation of wetlands, in addition to the presence of unpermitted structures. The complaint was reviewed by the Department's Code Enforcement staff and the Planning Director, who requested that the applicant submit a Major Vegetation Removal (MVR) questionnaire, which was done in February of 2025. No indication of excavations was noted by Code Enforcement staff. The information provided by the MVR form indicates that between June 2023 and April 2024, the property owner removed a number of various tree species from the within the project area. A total of 25 trees were removed including 8 eucalyptus trees with a diameter at breast height (DBH) of 10 inches or greater, and 15 alder trees all with a DBH of less than 10 inches. Per the MVR form, the eucalyptus trees removed were part of hazard mitigation which would qualify for an exclusion from CDP requirements under Mendocino County Ordinance 4531. The remaining trees did not meet the definition of MVR and so enforcement related to vegetation removal was considered completed. The project proposes using the existing site for vehicle and materials storage related to forestry operations, and would not require future vegetation removal with the possible exception of pruning related to restoring access along internal access roads.

f) **No Impact:** The project site is not the location of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other approved habitat plan.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have a **LESS THAN SIGNIFICANT 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, Section 15064.5 "*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:** On September 10, 2025 the project was reviewed by the Mendocino County Archaeological Commission for consistency with Chapter 22.12 of the Mendocino County Code. Due to the limited areas of possible concern within the project site, limited to riparian areas adjacent to the stream channels, combined with the fact that no development is proposed in those areas and they are already protected by ESHA buffers, the Commission voted not to require any additional surveys. No historical resources are present on the site, and approval of the project will not result in changes to possible archaeological resources on the site including human remains.

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: California Senate Bill (SB) 350, known as the Clean Energy and Pollution Reduction Act of 2015, sets 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 saving and demand reductions in electricity and natural gas 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 2022 Scoping Plan for Achieving Carbon Neutrality, adopted by the California Air Resources Board (CARB), *"lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas (GHG) emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279."* [15]

Title 24, Part 11 of the California Code of Regulations establishes the California Green Building Standards Code, known as 'CALGreen'. The purpose of this code is to enhance the design and construction of buildings and encourage sustainable construction practices as they relate to planning and design, energy efficiency, water efficiency and conservation, materials conservation and resource efficiency, and environmental quality. Unless specifically exempt, the CALGreen standards apply to the planning, design, operation, construction, use, and occupancy of newly constructed buildings or structures throughout the state. Mandatory standards for energy efficiency are adopted by the California Energy Commission every three years. In 2021, the Commission adopted the 2022 Energy Code, which includes Building Energy Efficiency Standards. The Code *"encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more."*

[15] California Air Resources Board (2022). *2022 Scoping Plan for Achieving Carbon Neutrality*. Retrieved from https://ww2.arb.ca.gov.

Project factors that may influence energy impacts include the following:

- Energy consuming equipment and process to be used during construction, operation, or demolition, including the energy intensiveness of materials and equipment.
- Fuel type and end use of energy.
- Energy conservation equipment and design features to be implemented.
- Energy supplies that would serve the project, such as a utility company.
- Vehicle trips to be generated, including estimated energy consumed per trip.

Factors that may lessen energy impacts include those that decrease overall per capita energy consumption; decreased reliance on fossil fuels such as coal, natural gas, and oil; and increased reliance on renewable energy sources.

Mendocino County General Plan Policies RM-55, and RM-57 relate to energy, including Action Item RM-55.1 and RM-55.2.[16] Ukiah Public Utilities is the only municipal utility in Mendocino County. Most residents receive electric service from Pacific Gas and Electric (PG&E).

a) **No Impact:** No additional energy sources would be required beyond those that currently exist. Per the project site map there are no propane or on-site fuel storage tanks, so the energy source for the site would be limited to electrical and possibly natural gas, if available. Current energy uses consist of incidental lighting and power related to the maintenance shop and an existing well pump. The existing but unpermitted mobile office building uses a gasoline generator for its limited power requirements, which would remain. The proposed use would result in a minimal increase of energy use on the site, mostly in conjunction with operation of the existing shop for maintenance of forestry vehicles and equipment.

b) **No Impact:** All construction associated with the project would be required to comply with applicable building regulations designed to maximize efficient use of energy. Proposed increases in energy usage would be minimal and would not interfere with the 2015 Clean Energy act or subsequent State regulations for renewable resources.

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?	☐	☐	☐	☒

[16] The County of Mendocino (2009). *General Plan*. Retrieved from https://www.mendocinocounty.gov/government/planning-building-services/plans/mendocino-county-general-plan.

WOULD THE PROJECT:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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 vast majority of Mendocino County is underlain by bedrock of the Franciscan Formation. Thick soil development and landslides often 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 often 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. Human activities that affect vegetation, slope gradients, and drainage processes can contribute to landslides and erosion.

Areas susceptible to erosion occur throughout Mendocino County where surface soils possess low-density and/or low-strength properties. Slopes are another factor in soil erosion – the greater the slope, the greater the erosion hazard, especially if the soil is bare. Soils on nine (9) percent slopes and greater have a moderate erosion hazard, and soils on slopes greater than fifteen (15) percent have a high erosion hazard.

In 1991, the U.S. Department of Agriculture and Soil Conservation Service, in partnership with several other agencies, published the Soil Survey of Mendocino County, Eastern Part, and Trinity County, Southwestern Part, California. The survey assigns different soils to Map Unit numbers. In 2002, the accompanying Soil Survey of Mendocino County, California, Western Part was published.

The California Geological Survey (CGS) houses the web-based California Earthquake Hazards Zone Application (EQ Zapp), which allows a user to check whether a site is in an earthquake hazard zone. [17] The California Department of Conservation also houses a general-purpose map viewer that contains layers displaying locations and data related to the California Landslide Inventory, the Seismic Hazards Program, Earthquake Shaking Potential, Historic Earthquakes, and others.

Development can result in soil erosion or loss of topsoil if project activities result in deep slope rills, gullies, or unmanageable accumulation of sediment. Ground disturbing activities most often result in impacts, including grading. Soil can be exposed during construction activities and increase the potential for soil erosion to occur, especially during storm events. Impervious surface areas would not be prone to erosion or siltation because no soil is included in these areas but increased impervious surfaces may impact surrounding hydrology and result in erosion impacts nearby.

[17] California Department of Conservation (2021). California Geological Survey. *EQ Zapp: California Earthquake Hazards Zone Application.* Retrieved from https://www.conservation.ca.gov/cgs/geohazards/eq-zapp.

Lateral spreading often occurs on gentle slopes or flat terrain and consists of lateral extension accompanied by shear or tensile fracture. Lateral spreading is often caused by liquefaction, which in turn is triggered by rapid ground motion from earthquakes or artificial activities. Bedrock or soil resting on materials that liquefy can undergo fracturing and extension and may then subside, translate, rotate, disintegrate, or liquefy and flow.

Subsidence refers to broad-scale change in the elevation of land. Subsidence is commonly caused by groundwater extraction, oil extraction, underground reservoir pumping of gas, dissolution of limestone aquifers (sinkholes), collapse of a mine, drainage of organic soil, or initial wetting of dry soil (hydrocompaction). The US Geological Survey (USGS) regularly publishes information on land subsidence in California, including a map showing areas of land subsidence due to groundwater pumping, peat loss, and oil extraction. [18]

The Mendocino County Local Agency Management Plan establishes standards for on-site treatment of wastewater, including site evaluation, design, construction, and monitoring requirements. The Plan is administered by the Division of Environmental Health.

Unique geologic features are rocks or formations which:

- Are the best example of their kind locally or regionally; or
- Embody the characteristics of a geologic principle that is exclusive to the locality or region; or
- Provide a key piece of information important in geology or geologic history; or
- Are a "type locality" of a geologic feature.

Impacts to unique geologic features could include material impairment through destruction or alteration, including grading, rock hunting, human encroachment, or permanent covering of the feature.

a) **No Impact:** The closest mapped fault zone to the project is the San Andreas fault zone, located approximately 6 miles west of the project site and offshore. A significant tectonic episode along this fault line would likely result in seismic impacts to the region, but there are no specific impacts that would cause this site to require special considerations.

b) **No Impact:** The project proposes storage of materials and equipment used in forestry operations and the site is flat and has been developed for more than 50 years. The project does not propose grading or soil disturbance beyond incidental grading required to restore existing internal access roads, and the removal of asphalt shavings that were previously placed on road surfaces without permits. The project would not increase the risks of erosion or affect topsoil.

c) **No Impact:** The majority of the project site is classified as Tregoning-Cleone complex soils [19], which are found on marine terraces and primarily used for homesite development, wildlife habitat, or watershed. Surface cuts can increase the hazard of erosion if not stabilized through revegetation. The balance of the site is Tropaquepts soils along creeks and drainages. Neither of these soils types are considered unstable or geologically active and would not become so as a result of project approval.

d) **No Impact:** The project site is not located on expansive soil, as defined in Table 18-1-B of the 1994 Uniform Building Code.

e) **No Impact:** As noted in section c), the majority of the on-site soils are suitable for homesite development including septic. However, the project consists only of forestry and industrial uses and does not propose the installation of bathrooms or septic. Bathroom facilities for any on-site staff would be provided by a temporary portable restroom or via the existing forestry office on the adjacent parcel to the south.

[18] U.S. Geological Survey. Liquefaction Susceptibility. Retrieved from https://earthquake.usgs.gov/education/geologicmaps/liquefaction.php.

f) **No Impact:** The project was referred to the Mendocino County Archaeological Commission for review of existing records. The Commission voted not to require additional studies for the project.

MITIGATION MEASURES: None.

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

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: Title 14 CCR Section 15064.4 establishes specific guidelines for determining the significance of impacts from greenhouse gas emissions. Lead agencies may choose to quantify greenhouse gas emissions resulting from a project or rely on a qualitative analysis or performance-based standards.

Mendocino County Air Quality Management District (MCAQMD) has 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 MCAQMD, these CEQA thresholds of significance are the same as those which have been adopted by the Bay Area Air Quality Management District (BAAQMD) with noted exceptions.

MCAQMD has not adopted a construction related emissions threshold. For projects other than stationary sources, the operational threshold is 1,100 Metric Tons of CO2e per year or 4.5 Metric Tons of CO2e per SP (residents + employees) per year. For stationary sources, the operational threshold is 10,000 Metric Tons of CO2e per year.

The California Emissions Estimator Model (CalEEMod) is a tool that can be used to quantify ozone precursors, criteria pollutants, and greenhouse gas emissions from construction and operation of development in California. The model is published by the California Air Pollution Control Officers Association. [20]

MCAQMD and Mendocino County have not adopted any plans specifically aimed at reducing GHG emissions. However, General Plan Policy RM-50 and associated action items address GHG emissions: California Climate Policies related to GHG emissions include but are not limited to SB 32, AB 32, AB 1493, SB 100, SB 350, SB 375, SB 743, SB 604, and SB 1383.

a) **Less than Significant Impact:** The scope of the project does not include any construction period as the site is already suitable for the proposed use, and existing structures will be used for the operations. The CalEEMod model does not adequately analyze projects with such minimal impact so no specific numbers could be generated, but it can be reasoned that any GHG impacts associated with ongoing operations would be less than significant. Best management practices can be recommended to keep impacts minimal, such as limiting diesel vehicle idling.

[20] California Air Pollution Control Officers Association. (2022). *CalEEMod* (Version 2022.1). https://www.caleemod.com/.

b) **Less Than Significant:** As noted above, the operational threshold for significance is 10,000 metric tons of CO2e per year. The project does not require a construction phase, and the increase of CO2e emissions during the operational phase would be limited to construction activities related to site maintenance, loading/unloading of materials, and daily commute traffic of employees.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have **LESS THAN SIGNIFICANT 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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

DISCUSSION: 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) **Less than Significant Impact:** The project includes storage of materials related to forest operations, including railcar bridges, fencing, and culverts, as well as the use of a fire training structure and fleet storage. Firefighting foams contain perfluoroalkyl and polyfluoroalkyl (PFAS) substances, a group of synthetic chemicals that are hydrophobic and therefore beneficial in fire suppression activities.[21] However PFAS chemicals also persist in the environment and have been seen to contaminate groundwater sources and be linked to certain types of cancers. In 2019, the State passed Senate Bill (SB) 1044 which prohibited the use of PFAS foams in firefighter training exercises. Legalization of the unpermitted fire training structure on the site would allow future training activities to occur that may result in the presence of PFAS containing foam fire apparatus within the project site. However, provided existing state law is complied with, no release of PFAS containing foams should occur onsite unless directly related to fire suppression activities which does not include training.

b) **Less than Significant Impact:** See item a), above.

c) **Less than Significant Impact:** See item a), above. The project would not include handling of hazardous materials or result in hazardous emissions. Additionally, there are no identified schools or school facilities within ¼ mile of the project site. The closest identified school is 2.6± miles north of the project site near Fort Bragg.

[21] ALS Global.com Retrieved August 5, 2025

d) **No Impact:** The project site is not currently included on the California Department of Toxic Substances (DTSC) 'Cortese List' sites. [22]

e) **No Impact:** The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest identified airport to the site is the Little River Airport, which is located 7.3± miles south of the site.

f) **No Impact:** The project site is not within the boundaries of an adopted emergency response plan or emergency evacuation plan. The project has received preliminary clearance from CAL FIRE, which includes road and driveway standards for access during emergencies. The project would include periodic transportation of forestry materials, including culverts up to 12 feet in diameter and up to 30 feet in length, which would require a transportation by tractor-trailer along Gibney Lane. Use of the road would be incidental and not expected to interfere with either standard or emergency use of the existing roads.

g) **Less than Significant Impact:** The project site is classified as a High Fire Hazard Zone by CAL FIRE [23] but has been developed as an industrial site for more than 50 years. The majority of the site is cleared of vegetation and reduced to bare soil or gravel, with the exception of several riparian areas that intersect the site and their associated vegetation. Storage of construction materials would not be a source of ignition, and possible ignition from parking/operation of employee or fleet vehicles is expected to be minimal as the parking area is free of vegetation. No additional employees would be permanently on site, and resources would be managed from the existing forestry office on the adjacent parcel. The fire training facility would be used intermittently with no regular on-site personnel associated with it.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have a **LESS THAN SIGNIFICANT 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

[22] DTSC EnviroStor (Cortese List)
[23] CAL FIRE Fire Hazard Zone Mapping

WOULD THE PROJECT:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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.

Mendocino County Code Title 16 establishes water and sewage regulations. It is primarily the responsibility of the Division of Environmental Health (EH) to implement these regulations, including permitting wells and septic systems. Chapter 16.30 establishes stormwater runoff pollution prevention procedures. The purpose of Chapter 16.30 is to *"protect and promote the health, safety, and general welfare of citizens, and protect and enhance the water quality of watercourses, water bodies, and wetlands in a manner pursuant to and consistent with the Federal Clean Water Act (33 U.S.C. § 1251 et seq.), and the Porter-Cologne Water Quality Control Act (California Water Code Section 13000 et seq.) by reducing pollutants in storm water discharges to the maximum extent practicable and by prohibiting non-storm water discharges to the storm drainage system."*

The National Flood Hazard Layer maintained by the Federal Emergency Management Agency (FEMA) can be used to review project impacts from flooding. The Department of Water Resources Division of Safety of Dams (DSOD) reviews and approves inundation maps prepared by licensed civil engineers and submitted by dam owners for hazardous dams and appurtenant structures. These maps are based on a hypothetical failure of a dam or appurtenant structure. DSOD maintains a web map that displays this information.

Projects may be subject to applicable regulations found in MCC Chapter 16.30. Section 16.30.040 prohibits elicit discharges. Section 16.30.070 requires implementation of Best Management Practices (BMPs) to the maximum extent practical for reducing pollutants in stormwater.

a) **No Impact:** The project proposes storage of forestry materials, including railcar bridges, timbers, fencing, and culverts. The only runoff associated with the project would be from incidental rainfall washing over the materials and onto the ground surface. The project site contains two existing riparian areas; Bromley Creek and an unnamed pond used for dust suppression. These areas would be considered ESHA under the Coastal Act and the Mendocino County LCP but were analyzed in the biological report which determined that a reduced buffer of 50 feet was sufficient to protect these resources. Additional best practices avoidance measures were recommended in the report, which have been incorporated as Conditions of Approval.

b) **No Impact:** The project will not require the use of any groundwater sources beyond those that exist on the site (such as new wells). The existing pond may be continued to be utilized for dust suppression on the site, but no other changes to the riparian areas would occur. Bromley Creek and the existing pond provide atmospheric interface to ground water sources and allow for a natural recharge of groundwater resources through rainfall.

c) **No Impact:** The project would not require changes to any existing watercourse or drainage on the site, or result in the addition of impervious surfaces. Storage of nonpermeable materials such as culverts and railcar bridges may result in locally increased runoff, but that storage is transitional as those materials are subsequently moved off-site to existing forestry operations.

d) **No Impact:** The project site is not within a mapped flood hazard, tsunami, or seiche zone and so would not be subject to hazards or discharges associated with those events.

e) **No Impact:** The proposed project would consist of storage of materials and equipment related to forestry operations and does not propose new wells or water sources. Mendocino County Ordinance No. 4313 (Stormwater Runoff Pollution Prevention Procedure) establishes best management practices (BMP) to prevent the discharge of construction waste, debris, or contaminants from construction materials, tools, or equipment from entering existing drainages. The project site is not within the County's regulatory stormwater area, but operation of the project site would not generate runoff into drainages as previously discussed in section a) above and in the *Biological* section elsewhere in this document.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have **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 is not within the boundaries of a specific plan or area plan. The project site is located within the Coastal Zone and is therefore subject to the Coastal Element of the General Plan. During project referrals, a number of agencies that may have jurisdiction over the project were contacted.

a) **No Impact:** CEQA does not provide any definition of 'community', but Merriam-Webster indicates the word 'community' could be applied to a 'unified body of individuals or their area itself', or 'a group of people with a common characteristic or interest living together within a larger society'[24]. The proposed project would use the existing site for storage of forestry related materials such as railcar bridges, timbers, fencing materials, and culverts, in addition to permitting a fire training facility. The project would not result in the construction of new roads, structures, or barriers of any kind and could not be considered to be dividing a 'community' in any way, regardless of definition.

b) **No Impact:** The project site is located within the Coastal Zone and the Mendocino County LCP regulates the type and scale of development that may be allowed. The site is currently zoned Coastal Industrial (I), which is consistent with its historic use as a lumber mill. The Coastal Industrial zoning allows *General Industrial* as a conditional use, which would require approval of a Coastal Development Use Permit. In addition to *General Industrial* the project would include *Automotive and Equipment: Fleet Storage* and *Fire and Police Protection Services* to cover the storage of company fleet vehicles and permitting of the fire training structure. These are both conditional uses within the I zone as well and can be permitted through the Coastal Development Use Permit process.

The LCP contains only a few general policies applicable to the development of Industrial sites:

Policy 3.11-13: New industrial development shall be contiguous with, or in close proximity to existing developed areas able to accommodate it or where such areas are not able to accommodate it, in other areas with adequate public service and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

The project is consistent with this policy through the use of an existing industrial site that has been in use for more than 50 years.

Policy 3.11-15: Legally existing development located on industrial designated land shall be allowed to continue and shall be allowed to expand their current uses consistent with Coastal Act policies and to meet economic and social needs of the County of Mendocino and the coastal area.

Approval of the project would constitute the continuation of a legally existing industrial use, and is consistent with this policy.

MITIGATION MEASURES: None.

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

[24] Merriam-Webster.com Retrieved August 5, 2025

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 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 policies for the reclamation of mined lands and the conservation of mineral resources. SMARA also directs the State Geologist to identify and map non-fuel mineral resources of the state to show where economically significant mineral deposits occur and where they are likely to occur based upon the best available scientific data. No SMARA classification has yet occurred in Mendocino County.

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. No specific sites have been identified in the General Plan or Coastal Element as locally important mineral resource recovery sites beyond the general identification of quarries, instream gravel, and terrace gravel operations. The California Division of Mine Reclamation houses the Mines Online database, which maps the location and provides access to documents for mines in Mendocino County. According to the Mines Online database, Mendocino County contains twenty-nine (29) mines. Additionally, the U.S. Geological Survey (USGS) publishes the USMIN Mineral Deposit database, which includes a map of prospect- and mine-related features digitized from historical USGS topographic maps. The features include prospect pits, mine shafts and adits, quarries, open-pit mines, gravel and borrow pits.

a) **No Impact:** The project site has not been previously evaluated for the presence of mineral resources including aggregate, so there would be no loss to known mineral resources. If resources were discovered in the future, approval of the project would not preclude potential development of the site as a quarry subject to required permits.

b) **No Impact:** See section a), above.

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?	☐	☐	☒	☐

WOULD THE PROJECT:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) For a project located within the vicinity of private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

DISCUSSION: Noise pollution has been linked to negative health impacts such as stress, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. In the 1970s, the U.S. Environmental Protection Agency (USEPA) coordinated all federal noise control activities through its Office of Noise Abatement and Control under Subchapter IV of the Clean Air Act. However, this office was phased out in 1982. The federal Noise Control Act of 1972 and Quiet Communities Act of 1978 remain in effect today, but their implementation is essentially unfunded. As such, the responsibility of regulating noise primarily rests with state and local governments. Nevertheless, USEPA has published several documents that outline the health effects of noise. For example, in 1974 USEPA published *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*. In 1979, USEPA published the *Noise Effects Handbook, a Desk Reference to Health and Welfare Effects of Noise*.

Federal Highway Administration regulations require noise impact analyses and the implementation of abatement measures to reduce or eliminate noise impact of federally funded highway construction projects in California.

In 1973, California passed the Noise Control Act, which created the Office of Noise Control. However, this office is now defunct. California Government Code Section 65302 requires that each General Plan contain a noise element. California Streets and Highways Code Section 216, known as the Control of Freeway Noise in School Classrooms, requires that Caltrans abate noise from freeways to specified levels when the noise exceeds acceptable thresholds within school classrooms.

According to California Health and Safety Code Section 46022, noise is defined as *"excessive undesirable sound, including that produced by persons, pets and livestock, industrial equipment, construction, motor vehicles, boats, aircraft, home appliances, electric motors, combustion engines, and any other noise-producing objects."*

Major noise sources in Mendocino County include highway and local traffic, railroad operations, airports, commercial and industrial uses, recreation, and community facilities. Highways with traffic that generates significant noise include US Highway 101, and State Routes 1, 20, 128, 162, 175, and 253. The only active railroad is the Skunk Train which runs between Fort Bragg and Willits. Public Airports include Ukiah Municipal, Willits Municipal (Ells Field), Round Valley Airport, Boonville Airport, Little River Airport, and Ocean Ridge Airport (Gualala). Private airstrips include the Lofty Redwoods Airport in Anchor Bay, the Fort Bragg Airport, and heliports at the Mendocino Coast District Hospital in Fort Bragg, Coast Life Support District in Gualala, and Adventist Health in Ukiah. Major industrial sources of noise include lumber mills and timber production facilities. Other noise sources are identified in the County General Plan. 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.

Per Mendocino County General Plan Policy DE-98, homes or noise-sensitive land uses are to be developed only in places where existing and projected noise levels would meet the exterior noise guidelines and standards shown in Policies DE-100 and DE-101. Per Policy DE-99, no new use regulated by the County shall be permitted to generate noise that would cause the ambient noise on any adjacent parcel to exceed the "completely compatible" 24-hour guidelines shown in Policy DE-101 or the 30-minute noise standards

in Policy DE-100. Noise mitigation must achieve these standards for any decision that would cause a violation of the standards. These decisions could include roadway construction projects, public park construction, General Plan amendments, changes of zone, conditional use permits, or site plan review approval.

Per General Plan Action Item DE-99.2, acoustical studies are required for (1) significant new noise generators, (2) new noise-sensitive uses in noise-impacted areas or near noise generator, or (3) new uses which are proposed to be developed in areas which do not meet the "completely compatible" exterior noise guidelines contained in Policy DE-100 or Policy DE-101.

Policy DE-100 establishes the following Exterior Noise Level Standards (levels not to be exceeded more than 30 minutes in any hour), where dBA are A-weighted decibels:

Land Use Type	Time Period	Maximum Noise Level (dBA)
Single-Family Homes & Duplexes	10 p.m. to 7 a.m.	50
	7 a.m. to 10 p.m.	60
Multiple Residential 3 or More Units Per Building (Triplex +)	10 p.m. to 7 a.m.	55
	7 a.m. to 10 p.m.	60

Policy DE-100 also specifies the following:

- Where existing ambient noise levels exceed these standards, the ambient noise level shall be the highest allowable noise level measures in dBA Leq (30 minutes), where "Leq" is equivalent continuous sound level.
- The noise levels specified above shall be lowered by 5 dB for simple tonal noises (such as humming sounds), noises consisting primarily of speech or music, or for recurring impulsive noises (such as pile drivers, punch presses, and similar machinery).
- The County may impose exterior noise standards which are less restrictive than those specified above, provided that:
    - The noise impact on residential or other noise-sensitive use is addressed in an environmental analysis,
    - A finding is made by the approving body stating the reasons for accepting a higher exterior noise standard, and
    - Interior noise standards will comply with those identified in Policy DE-103.

Policy DE-101 establishes the following Noise Compatibility Guidelines (expressed as a 24-hour day-night average or "LDN"):

Land Use	Completely Compatible	Tentatively Compatible	Normally Incompatible	Completely Incompatible
Residential	Less than 55 dBA	55-60 dBA	60-75 dBA	Greater than 75 dBA
Commercial	Less than 65 dBA	65-75 dBA	75-80 dBA	Greater than 80 dBA
Industrial	Less than 70 dBA	70-80 dBA	80-85 dBA	Greater than 85 dBA

Policy DE-101 also establishes the following:

- These guidelines apply to land designated by this General Plan for these uses. Residential, retail, or public parks that have been developed on land designated for other uses shall be subject to the exterior noise guidelines for the land on which they are located.
- Non-residential uses located on residentially designated land shall be subject to the exterior noise guidelines for residential lands.
- All uses on Commercial lands, including non-commercial uses, shall be subject to commercial land standards. Land use designations not listed above do not have exterior noise compatibility standards. Land use designations with no exterior noise compatibility standard include office and industrial.
- Standards for public schools are set and enforced by the State of California and are not regulated by the County.

Policy DE-103 establishes the following Maximum Acceptable Interior Noise Levels Created by Exterior Noise Sources:

Land Use Type	Acceptable Noise Level (dBA Ldn or CNEL)
Residential Living and Sleeping Areas, Daytime	45 dBA
Private School Classrooms	55 dBA
Commercial, Educational, Office, Light and Heavy Industrial, Warehousing	Conform with applicable state and federal workplace safety standards

Policy DE-103 further clarifies that the noise created inside a residential home, classroom, or library shall not count toward the acceptable noise levels in this policy. Policies DE-107 through DE-110 prioritize the use of distance and landscaping as methods for addressing noise. Noise barriers are generally discouraged.

Ground vibration can be caused by the operation of construction equipment and construction techniques such as blasting, pile driving, or demolition activity. Roadway traffic can also be a source of vibration, though traffic rarely generates vibration amplitudes high enough to cause structural damage. Trains can also be a significant source of ground vibration. The motion of particles is used to describe ground vibration, including the concepts of particle displacement, velocity, and acceleration. Vibratory motion is often described by identifying the peak particle velocity (PPV), which is the zero-to-peak amplitude of ground vibration waves.

Sources of ground vibration can be categorized into equipment or activities typical of continuous vibration, single-impact or low-rate repeated impact vibration, and high-rate repeated impact vibration. Equipment or activities typical of continuous vibration include excavation equipment, compaction equipment, and vibratory pile drivers. Equipment or activities typical of single-impact or low-rate repeated impact vibration include impact pile drivers, blasting, or drop balls. Equipment or activities typical of high-rate repeated impact vibration include jackhammers and hydraulic breakers ("hoe rams").

Ground vibration can be annoying to people and has the potential to damage structures, including structural and cosmetic architectural damage. Ground vibration also has the potential to disrupt the operation of vibration-sensitive equipment, such as microscopes, MRI machines, and precision milling equipment. Vibration amplitudes (PPV) of various construction equipment can be calculated using methods described in the California Department of Transportation's (Caltrans') 2020 *Transportation and Construction Vibration Guidance Manual*.[25] The manual also includes guidelines for vibration damage and vibration annoyance potential thresholds. One method for reducing vibration is the installation of wave barriers. A wave barrier is a trench or thin wall made of sheet piles or similar structural members.

Mendocino County has adopted two (2) airport land use plans. The Mendocino County Airport Comprehensive Land Use Plan was adopted in 1996 and covers the Boonville Airport, Ells Field, Little River Airport, Ocean Ridge Airport, and Round Valley Airport, The Ukiah Municipal Airport Land Use Compatibility Plan was adopted in 2021. Together, the plans cover all public airports in Mendocino County and contain individualized policies related to noise. Certain land use actions require review by the Mendocino County Airport Land Use Commission.

a) **Less than Significant Impact:** As noted in the discussion section above, the Mendocino County General Plan has adopted noise standards and consistency guidelines for various land use types. The project site is a former industrial lumber mill that was established more than 50 years ago, but is now surrounded by low and medium density residential uses, including a 22± lot subdivision immediately to the west. The conflict between sensitive residential uses and noise-generating industrial uses is a fundamental concern when considering reestablishment of industrial uses on the project site. The current project proposes storage of forestry related materials and equipment, including railcar bridges, timbers, fencing materials, culverts, trailers, and vehicles. The existing shop building would also be used to provide maintenance services for forestry vehicles, and an existing but unpermitted fire training tower would be legalized,

[25] California Department of Transportation (Caltrans). (2020). *Transportation and Construction Vibration Guidance Manual*. California Department of Transportation, Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, Paleontology Office.

allowing intermittent use of the facility by local firefighting personnel. Transportation of materials to the site via large trucks is estimated to be no more than 6 times per year, with transport of materials from the site via smaller commercial vehicles at less than once per week. Operation of forestry equipment on the site is expected to be limited to movement between transportation vehicles (e.g., flatbed trailers), the maintenance shop, and the fleet storage area and would not be a significant source of additional noise. The most significant source of additional noise is likely to result from slightly increased traffic accessing Gibney Lane on the way to and from the project site as materials and equipment are transported. However, per the applicants proposal the increase in vehicle trips will be minor, resulting in a less than significant impact on ambient noise.

b) **No Impact:** The project does not propose digging, blasting, drilling or other work that is typically associated with significant groundborne vibrations. Some vibrations may occur as a result of heavy equipment being moved around within the project site, but these would be limited to the immediate area around the equipment and not felt off-site.

c) **No Impact:** The project is not located within the vicinity of a private airstrip or airport land use plan, or within two miles of a public airport or public use airport. The closest airport to the project site is the Little River Airport, located 7.3± miles to the south. No impacts related to airport noise will occur as a result of project approval.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have a **LESS THAN SIGNIFICANT 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 2,552 housing unit for the unincorporated area between 2009 and 2014. 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:** Population growth in an area can typically be spurred by either the creation of new homes, or the displacement of existing homes that forces residents to relocate to other areas. The project proposes using an existing Industrial site for storage of materials related to forestry operations, including railcar bridges, timbers, fencing materials, and culverts. The project site has been used as a mill for more than 50 years and is currently vacant with the exception of a shop and an unpermitted fire training facility. Residences are not permitted within the Coastal

Industrial zone with the exception of employee housing related to an industrial operation, so approval of the project would not result in the loss of either current or possible future home sites.

b) **No Impact:** See item a), above.

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.

Fire protection services are provided by the California Department of Forestry and Fire Protection (CAL FIRE) or one of several local fire districts. Police protection is provided by the County Sheriff, California Highway Patrol, or city police. Several school districts and parks are located throughout the County. Other public facilities include roads, libraries, water and sewage treatment plants, airports, and animal control facilities. Projects may have an impact if they would cumulatively contribute to significantly increased demand for public services such that new facilities would be required. General Plan Policy DE-179 establishes standards for the provision of parkland in the county. The amount of sufficient park space is determined by population. [26]

a) **No Impact:** Project referrals were provided to both the Fort Bragg Rural Fire Protection District and CAL FIRE. FBRFP responded with no comments, and CAL FIRE provided a list of state fire safe regulations that must be complied with before permit approval. The project proposes storage of nonflammable forestry materials, including metal bridges, culverts, and fencing materials. No new structures requiring fire protection are proposed, and there would be no change in the level of service required to provide fire protection.

b) **No Impact:** The project proposes the use of an existing site for the storage of forestry materials and use of a shop and fire training facility. The project would not include any overnight occupation or residential uses that could increase demand police services.

c) **No Impact:** The project consists of an industrial use on an industrial site and would not have any impacts on school services. Any permits for subsequent commercial structures would be required to pay applicable school fees.

[26] The County of Mendocino (2009). *General Plan*. Retrieved from https://www.mendocinocounty.gov/government/planning-building-services/plans/mendocino-county-general-plan.

d) **No Impact:** The total number of employees needed for operation of the facility is estimated at 4 and it is expected that existing staff in the forestry office on the parcel to the south will cover those responsibilities, so not additional staff will be required.

e) **No Impact:** See item d) above.

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 Facilities and Fleet Division. Additionally, the County is host to a variety of state parks, reserves, other state protected areas used for the purpose of recreation, with thirteen (13) locations along the coast and eight (8) in the inland areas.

a) **No Impact:** The project proposes storage of forestry materials including railcar bridges, fencing materials, timbers, and culverts, along with approval of a fire training facility. The project site is within 5 miles of several state parks along the Mendocino Coast, which could potentially be visited by project staff. However, the increased use of the park facilities would be negligible given the low number of employees on the site.

b) **No Impact:** The project does not propose the construction of new recreational facilities or require the use of existing facilities, so there will be no physical impacts related to the construction of new facilities.

MITIGATION MEASURES: None.

FINDINGS: The proposed project would have **NONE** 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?	☐	☐	☐	☒

WOULD THE PROJECT:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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: General Plan Policy DE-131, DE-148, DE-149, and DE-157 relate to transportation, including Action Item DE-138.1.[27] The Mendocino Council of Governments (MCOG) most recently adopted a Regional Transportation Plan on April 7, 2022. The Regional Transportation Plan is a long-range planning document that provides a vision of regional transportation goals, policies, objectives, and strategies. These may be relevant to individual projects when conducting environmental review.

CEQA Guidelines Section 15064.3 recommends *"specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel."* This section details appropriate methods for determining the significance of transportation impacts.

According to the 2018 Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA, *"many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact."*[28] The 2010 MCOG Travel Demand Forecasting Model estimates daily trip generation values for various land uses and geographic areas in Mendocino County and may be used to assist in determining whether projects exceed the screening threshold.[29]

The Mendocino County Department of Transportation (DOT) is responsible for the maintenance and operation of County maintained roads, bridges, and related features. The County Road and Development Standards apply to road improvements, project-related improvements in subdivisions, and other land development projects that require County approval. On state highways under CALTRANS jurisdiction, the Highway Design Manual establishes policies and procedures that guide state highway design functions. Mendocino County Code Section 17-52, 53, and 54 establish lot design, configuration, access, and private road requirements for subdivisions.

a) **No Impact:** The Mendocino County LCP contains several policies related to transportation and development along State Route 1, but none that would pertain to the proposed project. Similarly, Mendocino County Code §20.516.015(C) imposes several transportation requirements, but only for subdivision projects or where projects relate to corridor preservation setbacks. The project abuts Holquist Lane, a County road, to the south and would be subject to corridor preservation setbacks from this road. But neither Holquist Lane nor Gibney Lane have been improved with pedestrian accommodations including bicycle lanes, so the project would not conflict with any of these programs.

b) **Less than Significant Impact:** PRC §15064.3(b) provides methods for a Lead Agency to evaluate the transportation impacts that may result from approval of a project. The most common method used to evaluate transportation impacts related to land use projects is by

[27] The County of Mendocino (2009). *General Plan*. Retrieved from https://www.mendocinocounty.gov/government/planning-building-services/plans/mendocino-county-general-plan.
[28] State of California. Governor's Office of Planning and Research. (2018). *Technical Advisory on Evaluating Transportation Impacts in CEQA.*
[29] Mendocino Council of Governments. (2010). *Final Model Development Report: MCOG Travel Demand Forecasting Model.*

using vehicle miles travelled (VMT) measured against an established threshold of significance. However, as provided for in §15064.3(b)(3), a qualitative analysis may be conducted for projects that don't fit within established VMT models or lack a sufficient amount of data to be so analyzed. The project proposes storage of materials and equipment related to forestry operations, including railcar bridges, timbers, fencing materials, culverts, and equipment. The operation is estimated to require a maximum of 4 employees to manage, and it's the expectation of the applicant that these staffing requirements can be met by employees currently working in the forestry office adjacent to the project site. Transportation of materials to off-site forestry operations can be expected to occur periodically throughout the year as needed.

The mobile office building on the site is currently leased to a tree care management company. Per the applicant's information, the company employs approximately 30 staff, with 15 fleet vehicles parked daily. Depending on the scheduled work, daily trips can be estimated to range from 30 – 90 per day, including employees travelling to the site, fleet vehicles leaving and returning, and employees leaving the site. The *Technical Advisory on Evaluating Transportation Impacts in CEQA* prepared by the Governor's Office of Land Use and Climate Innovation (LCI) indicates that projects that generate or attract less than 110 trips per day may be generally assumed to cause a less-than-significant impact. The mobile office use of the site is estimated to fit within this screen threshold. Additional trips generated by the fire training facility are assumed to be minimal, with use of the tower estimated between one and four days per month.

The project site is served by Holquist Lane, a publicly maintained road, via State Route 1. Transportation of materials would likely utilize the local network of state highways including SR 20 and SR 128 before exiting onto private property. The applicant estimates delivery trips to be approximately 6 incoming and 50 outgoing per year. However, approval of the project may result in a neutral or net-loss impact on these factors by locating the materials storage site closer to the end-use locations.

c) **Less than Significant Impact:** The project proposes the use of an existing developed site for storage of forestry materials, including railcar bridges, fencing materials, timbers, and culverts of varying sizes. No new transportation infrastructure is required or proposed for the project, so no changes would occur to the existing access roads (State Route 1, Gibney Lane, and Holquist Lane). Due to the large size of some of the materials, transportation on and off-site may require the use of a tractor-trailer or larger utility vehicle, which would result in temporary impacts to vehicles along Gibney Lane during travel. Gibney Lane is a rural two-lane road, so interactions between personal and commercial vehicles may present challenges due to the lack of improved shoulders. However this impact is considered to be minimal given the low frequency of transportation of larger materials, estimated at no more than 6 trips annually.

d) **No Impact:** The proposed project would not affect emergency access as there would be no permanent impacts to access roads. Operation of the site for materials storage and fire training would not require the creation of additional emergency access points.

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.	☐	☐	☐	☒

DISCUSSION: According to Public Resources Code (PRC) Section 21074, "Tribal cultural resources" are either of the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    - Included or determined to be eligible for inclusion in the California Register of Historical Resources.
    - Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1. (*"a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution."*)
- 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 Section 5024.1 (*(1) Is associated with events that have made a significant contribution to the broad patters of California's history and cultural heritage; (2) Is associated with the lives of persons important in our past; (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; (4) Has yielded, or may be likely to yield, information important in prehistory or history)*. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) or Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

PRC Section 5020.1(k) defines a "local register of historical resources" as *"a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution."*

PRC Section 5024.1(c) establishes the following: *"A resource may be listed as a historical resource in the California Register if it meets any of the following National Register of Historic Places criteria*:

- *Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.*
- *Is associated with the lives of persons important in our past.*
- *Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.*
- *Has yielded, or may be likely to yield, information important in prehistory or history."*

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 [30] and 1984 regional synthesis. [31] 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:** The project was referred out to a number of Tribes for review and comment, but no comments were received. The project was also referred to the Northwest Information Center at Sonoma State (NWIC) and the Mendocino County Archaeological Commission, but no additional studies were required. No tribal cultural resources have been identified on the site, so impacts related to project operation are not expected.

MITIGATION MEASURES: None.

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

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?	☐	☐	☐	☒

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

WOULD THE PROJECT:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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 proposes storage of forestry materials including railcar bridges, fencing materials, timbers, and culverts, along with the use of a fire training facility. Domestic and wastewater services including restrooms are available for employees at the forestry office adjacent to the project site, so no development of that infrastructure is required or proposed. Operation of the mobile business office will include a temporary portable toilet for use by employees of the business. Existing utility services including electrical are sufficient to serve the utility needs of the project.

b) **No Impact:** The only water resources required for the site would be in associated with employee needs (drinking water and restrooms) and dust abatement and fire suppression on the project site itself. Employee needs are provided by the forestry office on the adjacent parcel, and dust abatement/fire suppression is accomplished through the existing reservoirs on the project site, Bromley Creek and the existing pond.

c) **No Impact:** The project site is not served by any wastewater provider. Employee restrooms are provided in the forestry office on the adjacent parcel, which is served by an existing, on-site septic. A portable toilet will be placed on the site in conjunction with the mobile business office for use by employees of that business.

d) **No Impact:** Materials stored on the site are used in existing forestry operations throughout the County, so generation of solid waste from the project can be expected to be minimal and mostly related to incidental waste created by employees during their work shifts.

e) **No Impact:** As noted in item d) above, generation of solid waste on the site will be minimal and far below federal, state, and local regulatory thresholds.

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 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:** Beyond the adopted County EOP, no specific emergency response plan exists for the Gibney Lane neighborhood. The project proposes storage and occasional transportation of forestry materials, including railcar bridges, timbers, fencing materials, and culverts, in addition to periodic use of a fire training tower. The forestry operation would require the temporary presence of only 4 employees, with an unknown number of firefighting personnel present on site for period training. Operation of the project within the proposed scope would not have any impacts on emergency access or evacuations.

b) **No Impact:** The project site is flat and mostly open space, with several riparian areas cutting through the parcel. The project proposes storage of forestry materials, periodic operation of a mobile office building, and occasional use of a fire training tower. There are no special topographic considerations that would result in higher wildfire risk for occupants of this site during project operation.

c) **No Impact:** The project proposes using the existing open space area at the northern part of the parcel as its corporation yard for storing materials related to forestry processing, including railcar bridges, timbers, fencing materials, and culverts. An existing but unpermitted fire training tower near the southwest corner of the site would be legalized for use by local fire personnel for training exercises, and an existing shop would continue to be used for plant storage and vehicle maintenance. No new construction would occur as a result of project approval and no extension or addition of utility services would be required.

d) **No Impact:** The project proposes to utilize the site as-is for storage of materials and vehicles, and to legalize the use of an existing fire training tower and mobile office building. The project would not generate any additional runoff into creeks due to the addition of impermeable surfaces or wastewater being generated, so no downstream flooding impacts would occur. No changes to existing drainages would occur, as all work and storage would occur at least 50 feet from existing wetlands. The overall site has a slope of 10% or less, so no slope-related impacts would occur in the event of a wildfire, including landslides or other instabilities.

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	☐	☐	☐	☒

	WOULD THE PROJECT:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
	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:** As proposed, the project consists of the storage and periodic transportation of materials for use in off-site forestry operations, including steel railcar bridges, timbers for use in repairing and shoring up bridges, fencing materials including t-posts and wire, and steel culverts of assorted sizes used in road repair and maintenance. A portion of the site will be dedicated to parking of vehicles used in forestry operations. An existing shop will be used for vehicle maintenance and storage, and an existing but unpermitted fire training structure will be legalized for periodic use by local fire personnel. Additionally, an existing but unpermitted mobile office building will remain to provide office services related to *Automotive and Equipment: Fleet Storage* uses currently leasing a portion of the site. No construction or development would occur on the site with the exception of minimal grading that may be required to restore existing internal access roads, and pruning or removal of vegetation adjacent to these roads to allow vehicle access.

The project site was the location of a lumber mill for 50 years, until approximately 2003. Given the importance of timber operations within the history of Mendocino County and especially the connection to its coastal communities, it's possible that the old mill site may have contained structures that would have qualified as historic resources, but these were dismantled ministerially in the early 2000's, leaving only the existing maintenance shop. The project would utilize the existing shop and open space areas for its operations, and would not require any new development of land or structures. A biological report was prepared for the site in 2024 which found only a single instance of a sensitive resource on the site, and appropriate buffers are recommended for its protection. Bromley Creek passes through the project site from east to west and runs to the Pacific Ocean, but the creek has been identified as a Class II (non-fish bearing) watercourse, so project operations would not impact any fish or wildlife species.

b) **No Impact:** The only foreseeable impacts from project approval have been discussed elsewhere in this report, and are associated with minor impacts to transportation, biology, and noise. The project would not have any cumulative impacts related to its operation that are not otherwise mitigated.

c) **No Impact:** See item a) and b), above.

MITIGATION MEASURES: None

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