

**California Conservation Corps, Willits Center**

**FINAL  
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION  
AND  
RESPONSES TO COMMENTS**

**State Clearinghouse Number**

**2020019042**

**March 2020**

**Lead Agency:**



**California Conservation Corps  
1719 24<sup>th</sup> Street  
Sacramento, CA 95816**

**Prepared for:**



**State of California Department of General Services  
RES-D-PMDB-Environmental Services – MS 506  
707 3<sup>rd</sup> Street, Fourth Floor  
West Sacramento, California 95605**

**Prepared by:**



**2525 Warren Drive  
Rocklin, CA 95677**

**California Conservation Corps, Willits Center  
Notice of Determination**

**NOTICE OF DETERMINATION**

**TO:**

Office of Planning and Research  
1400 10<sup>th</sup> Street  
Sacramento, CA 95814

**FROM:**

California Conservation Corps  
1719 24<sup>th</sup> Street  
Sacramento, CA 95816

**SUBJECT:** Filing of Notice of Determination in compliance with Section 21108 of the Public Resources Code

**PROJECT TITLE:** California Conservation Corps, Willits Center

***State Clearinghouse Number***

2020019042

***Contact Person***

Ms. Stephanie Coleman

***Telephone Number***

(916) 376-1602

**Project Approval:**

The California Conservation Corps adopted the Initial Study/Mitigated Negative Declaration and approved the CCC, Willits Center on March 26, 2020.

**Project Location:**

Address: 440 East Hill Road, Willits, California, 95490

The Project site is located north of East Hill Road between the US Highway 101 bypass on the east and the former Northwestern Pacific Railroad corridor on the west in the Town of Willits, Mendocino County, California within Assessor Parcel Numbers (APNs) 007-160-18 and 007-100-28.

**Project Description:**

The California Conservation Corps (CCC) Willits Center (Proposed Project or Center) involves development of a new CCC operations center at 440 East Hill Road in the Town of Willits to accommodate relocation of existing operations at the CCC Ukiah Center. The proposed 27.7-acre Willits Center site is located north of East Hill Road, bounded by U.S. Highway 101 bypass on the east and the former Northwestern Pacific Railroad corridor on the west in the town of Willits, Mendocino County. The Project consists of a new CCC residential center that includes a total of approximately 64,000 square feet (sf) of new building construction. The Center will include 12 buildings consisting of an administration building, seven dormitories, an education building, a recreation building, a multi-purpose building with kitchen and dining room, a warehouse with work area and a hazardous materials storage room. The site will include asphalt paved surfaces for driveways and parking and concrete paving for service and staging areas and walkways. The Project also includes a paved emergency crew and vehicle staging area and solar photovoltaic array. The facility would be designed based on the prototype and CCC's residential needs to house 120 permanent Corpsmembers. The center is intended to be designed to Zero Net Energy (ZNE) per the Governor's Executive Order (EO) B-18-12 and achieve at minimum a Leadership in Energy and

**California Conservation Corps, Willits Center**  
**Notice of Determination**

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Environmental Design (LEED) Silver certification. Once completed, existing Ukiah Center CCC housing and training functions would be relocated to the Willits facility.

The California Conservation Corps, as the Lead Agency, has approved the above-described project and has made the following determinations:

- a. There is no substantial evidence that the Proposed Project will have a significant effect on the environment;
- b. In accordance with CEQA, a Mitigated Negative Declaration for the Proposed Project was prepared. The Mitigated Negative Declaration has been approved by the California Conservation Corps, which is the Lead Agency for the Proposed Project. The Mitigated Negative Declaration and record of project approval may be examined at the Department of General Services, Real Estate Services Division, 707 3<sup>rd</sup> Street, Fourth Floor, West Sacramento, California, 95605. The Mitigated Negative Declaration reflects the independent judgment and analysis of the California Conservation Corps;
- c. Mitigation measures were required to be made a condition of approval of the Proposed Project;
- d. A Statement of Overriding Considerations was not required to be adopted for the Proposed Project; and
- e. A Mitigation Monitoring and Reporting Plan was adopted for the Proposed Project.

This is to certify that the Final Initial Study/Mitigated Negative Declaration including comments and responses, the mitigation monitoring and reporting plan, and record of Project approval is available to the general public at: Department of General Services, Real Estate Services Division, 707 3<sup>rd</sup> Street, Fourth Floor, West Sacramento, California, 95605.



Mr. Dan Millsap  
Deputy Director  
Capital Outlay & Facilities Management Branch  
California Conservation Corps

03/26/2020  
Date

Date Received for Filing at OPR: \_\_\_\_\_

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**March 2020**

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Month Year

## FINAL MITIGATED NEGATIVE DECLARATION CALIFORNIA CONSERVATION CORPS, WILLITS CENTER

**Lead Agency:** California Conservation Corps

**Project Proponent:** State of California Department of General Services – Real Estate Services Division

**Project Location:** 440 East Hill Road, Willits, California, 95490 (Mendocino County)

**Project Description:**

The California Conservation Corps (CCC) Willits Center (Proposed Project or Center) involves development of a new CCC operations center at 440 East Hill Road in the Town of Willits to accommodate relocation of existing operations at the CCC Ukiah Center. The proposed 27.7-acre Willits Center site is located north of East Hill Road, bounded by U.S. Highway 101 bypass on the east and the former Northwestern Pacific Railroad corridor on the west in the town of Willits, Mendocino County. The Project consists of a new CCC residential center that includes a total of approximately 64,000 square feet (sf) of new building construction. The Center will include 12 buildings consisting of an administration building, seven dormitories, an education building, a recreation building, a multi-purpose building with kitchen and dining room, a warehouse with work area and a hazardous materials storage room. The site will include asphalt paved surfaces for driveways and parking and concrete paving for service and staging areas and walkways. The Project also includes a paved emergency crew and vehicle staging area and solar photovoltaic array.

The facility would be designed based on the prototype and CCC's residential needs to house 120 permanent Corpsmembers. The center is intended to be designed to Zero Net Energy (ZNE) per the Governor's Executive Order (EO) B-18-12 and achieve at minimum a Leadership in Energy and Environmental Design (LEED) Silver certification. Once completed, existing Ukiah Center CCC housing and training functions would be relocated to the Willits facility.

**Finding:** Based on the information contained in the attached Initial Study, the California Conservation Corps finds that there would not be a significant effect to the environment because the mitigation measures described herein would be incorporated as part of the Proposed Project.

**Public Review Period:** January 15, 2020 – February 14, 2020

## Mitigation Measures Incorporated into the Project to Avoid Significant Effects

### BIOLOGICAL RESOURCES

#### Mitigation Measure

**BIO-1: Conduct Pre-Construction Sensitive Plant Surveys.** The following shall be conducted prior to initiation of Project construction:

- Perform focused plant surveys according to USFWS, CDFW, and CNPS protocols. Surveys should be timed according to the blooming period for target species and known reference populations, if available, and/or local herbaria should be visited prior to surveys to confirm the appropriate phenological state of the target species. If additional special-status plant species are found during surveys within the Project Site (aside from the two mapped populations of Northern Semaphore grass) and avoidance of the species is not possible, seed collection, transplantation, and/or other conservation approaches shall be developed in consultation with appropriate resource agencies to reduce impacts to special-status plant populations. If no additional special-status plants are found on the Project Site, no further measures pertaining to special-status plants are necessary.

**BIO-2: Conduct Pre-Construction Sensitive Amphibians Surveys.** The following shall be conducted prior to initiation of project construction:

- Conduct pre-construction surveys for foothill yellow-legged frog and red-bellied newt where construction occurs near potential habitat. If either species is observed, consultation with CDFW is required prior to initiation of construction activities. No monofilament plastic mesh or line shall be used for erosion control where habitat for foothill yellow-legged frog is identified, to reduce the risk of entrapment during construction
- Silt fencing that will not be disturbed will be installed around suitable habitat for foothill yellow-legged frog and red-bellied newt, and fencing will be inspected daily to ensure no individuals are trapped along the fence.

**BIO-3: Conduct Pre-Construction Northwestern pond turtle surveys.** The following shall be conducted prior to initiation of project construction:

- Conduct a pre-construction Northwestern pond turtle survey within 24 hours prior to the initiation of construction activities and retain a qualified biologist to survey immediately prior to ground-disturbing activities in suitable habitat. If Northwestern pond turtle is found, consultation with CDFW is required, as well as the development of a relocation plan for Northwestern pond turtles encountered during construction.

**BIO-4: Conduct Pre-Construction Bird Nesting Surveys.** The following shall be conducted prior to initiation of project construction:

- Conduct a pre-construction nesting raptor and bird survey of all suitable habitat on and adjacent to the Project Site as described below within 14 days of commencement of construction during the nesting season (February 1 – August 31). Surveys should be conducted within 300 feet of the

Project Site for nesting raptors, including sharp-shinned hawk, and 100 feet of the Project Site for nesting birds.

- A no-disturbance buffer around the nest shall be established if active nests are found. The buffer distance shall be established by a qualified biologist and is recommended to be 300 feet for raptors and 50 feet for non-raptor songbirds. If an active sharp-shinned hawk, yellow-breasted chat, or yellow warbler nest is found, the no-disturbance buffer shall be determined through consultation with CDFW. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest tree, to be determined by a qualified biologist. No further measures are necessary once the young are independent of the nest. Pre-construction nesting surveys are not required for construction activity outside the nesting season.

**BIO-5: Conduct Pre-Construction Sensitive Mammal Surveys.** Implement the following prior to initiation of project construction:

- Conduct a pre-construction American badger survey within 48 hours prior to construction activities. Consultation with CDFW is required prior to initiation of construction activities if American badgers are found.
- Conduct a pre-construction survey for Ringtail. Consultation with CDFW is required prior to initiation of construction activities if potential den sites are located that will not be avoided by construction. No further measures are necessary if no potential den sites are found during the survey.
- Prior to work within potentially suitable bat roosting habitat, a bat habitat assessment is recommended for all suitable roosting habitat (i.e., manmade structures and suitable trees, if present). If the assessment identifies moderate to highly suitable roosting habitat, a qualified biologist will conduct an evening bat emergence survey that may include acoustic monitoring to determine whether or not bats are present. If Townsend's big-eared bats are found, consultation with CDFW is required prior to initiation of construction activities. No further measures are necessary if no suitable roosting habitat is found, or if bats are not found during the emergence surveys.

**BIO-6: Compensate for the Loss of Riparian Communities.**

- To compensate for the total loss of  $\pm 0.006$  acre of riparian habitat, prior to construction the Department of General Services (DGS) shall obtain a CDFW Section 1602 Permit and either create riparian habitat or purchase credits at an approved mitigation bank to ensure no net loss of riparian habitat functions and values. If purchasing mitigation credits, a 3:1 ratio will be employed, which would require a total of approximately 0.018 acre of riparian habitat credits from an agency approved mitigation bank. This ratio and acreage will be confirmed during the review of future engineering drawings and may be modified during the CDFW Section 1602 permitting process (if actual increase or decrease), which will dictate the ultimate compensation. The DGS will provide written evidence to the resource agencies that compensation has been established through the purchase of mitigation credits. The amount

to be paid will be the fee that is in effect at the time the fee is paid. Alternatively, DGS shall provide a Riparian Habitat Mitigation Plan for CDFW approval that identifies appropriate habitat creation, success criteria and monitoring and reporting requirements consistent with the Project's 1602 Permit conditions.

**BIO-7: Compensate for the Permanent Loss of Wetlands/Waters of the United States/Waters of the State.**

- To compensate for the permanent loss of Waters of the U.S./State, DGS shall obtain Section 404 and 401 Permits from the USACE and RWQCB and either create replacement wetland habitat or purchase credits at an agency-approved mitigation bank to ensure no net loss of wetland functions and values. The wetland compensation ratio will be a minimum of 1:1 (one acre of wetland habitat credit for every one acre of impact) to ensure no net loss of wetland habitat functions and values. The DGS will also implement the conditions and requirements of state and federal permits that will be obtained for the Proposed Project. The actual mitigation ratio and associated credit acreage may be modified based on final design and USACE and RWQCB permitting which will dictate the ultimate compensation for permanent impacts to Waters of the U.S./ State. Alternatively, DGS shall provide a Wetland Habitat Mitigation Plan for USACE and RWQCB approval that identifies appropriate wetland creation, success criteria and monitoring and reporting requirements consistent with the Project's Section 404 and 401 Permit conditions. Furthermore, existing data from a previous delineation conducted during the wet season in 2016 will be used to determine the extent of Waters of the State under the pending new State Dredge and Fill Procedures, and to support preparation of the application for a Water Quality Certification and Streambed Alteration Agreement.

**CULTURAL RESOURCES**

**Mitigation Measure**

**CUL-1: Implement Measures to Protect Unanticipated Cultural Resources Discoveries Awareness Training and Monitoring.**

- A qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology shall provide pre-construction cultural resources awareness training to all construction personnel. Training will include appropriate protocol following the unanticipated discovery of any archaeological deposits during construction. A qualified professional archaeologist shall be retained to monitor all ground-disturbing activity associated with the Project.

**Stop Work for Unanticipated Discoveries and Evaluate the Find**

If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 50-foot radius of the discovery. The qualified archaeologist shall be called upon to evaluate the significance of the find and shall have the

authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify RESD. RESD shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the CRHR. Work may not resume within the no-work radius until RESD, through consultation as appropriate, determines that the site either: 1) is not eligible for or CRHR; or 2) that the treatment measures have been completed to its satisfaction.
- If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (Assembly Bill [AB] 2641). The archaeologist shall notify the Mendocino County Medical Examiner (as per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Medical Examiner determines the remains are Native American and not the result of a crime scene, the Medical Examiner will notify the NAHC, who then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If RESD does not agree with the recommendations of the MLD, the NAHC may mediate (§ 5097.94 of the PRC). If no agreement is reached, RESD must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate information center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until RESD, through consultation as appropriate, determines that the treatment measures have been completed to its satisfaction.

## **GEOLOGY AND SOILS**

### **Mitigation Measure**

#### **GEO-1: Discovery of Unknown Paleontological Resources.**

- If any paleontological resources (i.e., fossils) are found during Project construction, construction shall be halted immediately in the subject area and the area shall be isolated using orange or yellow fencing until RESD is notified and the area is cleared for future work. A qualified paleontologist shall be retained to evaluate the find and recommend appropriate treatment of the inadvertently discovered paleontological resources. In addition, in the event of an inadvertent find, sediment samples should be collected and processed to determine the



small fossil potential on the Project Site. If RESD resumes work in a location where paleontological remains have been discovered and cleared, RESD will have a paleontologist onsite to observe any continuing excavation to confirm that no additional paleontological resources are in the area. Any fossil materials uncovered during mitigation activities should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

## **TRANSPORTATION**

### **Mitigation Measure**

#### **TRANS-1: Pay Fair Share for Signal Improvements.**

- The Project applicant shall pay their fair share toward the installation of a traffic signal at the intersection of Main Street and Baechtel Road.

## **TRIBAL CULTURAL RESOURCES**

### **Mitigation Measure**

#### **Tribal Cultural Resources**

- To ensure less-than-significant impacts to tribal cultural resources, the Tribal Cultural Resources section requires implementation of Mitigation Measure **CUL-1** to ensure less-than-significant impacts. For the full text of Mitigation Measure **CUL-1**, see Cultural Resources above.

## **SECTION 1.0 INTRODUCTION**

This document is the Final Initial Study and Mitigated Negative Declaration including the Responses to Comments and the Mitigation Monitoring and Reporting Plan (Final IS/MND) for the California Conservation Corps, Willits Center (Proposed Project). It has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resource Code Section 21000 et. seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.) as amended. This Final IS/MND and Responses to Comments document supplements and updates the Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) released for public review on January 15, 2020.

The California Conservation Corps is the Lead Agency for the Proposed Project. On January 15, 2020 the California Conservation Corps distributed the Draft IS/MND for the Proposed Project to public agencies and the general public for review and comment. In accordance with the State CEQA Guidelines, a 30-day review period, which ended on February 14, 2020, was completed. During the public review period, 4 (four) comment letters and/or emails on the Draft IS/MND were received from interested parties.

This Final IS/MND and Responses to Comments document is organized as follows:

- Section 1.0 provides a discussion of the purpose of the document and discusses the structure of the document;
- Section 2.0 contains a summary of the Project Description, a description of minor changes to the Project Description and a discussion regarding why these changes do not require recirculation of the Draft IS/MND;
- Section 3.0 includes the comment letters received and responses to these comments;
- Section 4.0 includes corrections and revisions made to the Draft IS/MND in response to comments;
- Section 5.0 includes the Proposed Project's Mitigation Monitoring and Reporting Program (MMRP), prepared pursuant to Public Resources Code Section 21081.6; and
- Section 6.0 includes the Notice of Intent, proof of publication, environmental filing receipt, and the Draft IS/MND.

This Final MND document and the Draft IS/MND together constitute the environmental document for the Proposed Project. As a result of comments received on the Draft IS/MND, minor revisions were required to the Draft IS/MND text, however, there were no substantial revisions that would require recirculation of the document. A substantial revision according to Section 15073.5 of the *2020 CEQA Statute Guidelines* shall mean:

"(1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or

(2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required."

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This Final IS/MND document and the Draft IS/MND together constitute the environmental document for the Proposed Project.

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## **SECTION 2.0 PROJECT OVERVIEW**

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### **2.1 Project Location**

The Proposed Project is located at 440 East Hill Road, Willits, California, 95490. The Project Site is located north of East Hill Road between the US Highway 101 bypass on the east and the former Northwestern Pacific Railroad corridor on the west in the Town of Willits, Mendocino County, California within Assessor Parcel Numbers (APNs) 007-160-18; and, 007-100-28.

### **2.2 Project Description**

The California Conservation Corps (CCC) Willits Center (Proposed Project or Center) involves development of a new CCC operations center at 440 East Hill Road in the Town of Willits to accommodate relocation of existing operations at the CCC Ukiah Center. The proposed 27.7-acre Willits Center site is located north of East Hill Road, bounded by U.S. Highway 101 bypass on the east and the former Northwestern Pacific Railroad corridor on the west in the town of Willits, Mendocino County. The Project consists of a new CCC residential center that includes a total of approximately 64,000 square feet (sf) of new building construction. The Center will include 12 buildings consisting of an administration building, seven dormitories, an education building, a recreation building, a multi-purpose building with kitchen and dining room, a warehouse with work area and a hazardous materials storage room. The site will include asphalt paved surfaces for driveways and parking and concrete paving for service and staging areas and walkways. The Project also includes a paved emergency crew and vehicle staging area and solar photovoltaic array.

The facility would be designed based on the prototype and CCC's residential needs to house 120 permanent Corpsmembers. The center is intended to be designed to Zero Net Energy (ZNE) per the Governor's Executive Order (EO) B-18-12 and achieve at minimum a Leadership in Energy and Environmental Design (LEED) Silver certification. Once completed, existing Ukiah Center CCC housing and training functions would be relocated to the Willits facility.

### **2.3 Decision Not to Recirculate Draft MND**

After the completion of the public/agency comment period for the Draft IS/MND, minor changes were made to sections of the IS/MND. These revisions do not meet the criteria for recirculation of the MND prior to adoption as outlined in Section 15073.5 of the State CEQA Guidelines. According to the Guidelines "A lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has been given pursuant to Section 15072 but prior to its adoption."

The revisions proposed in this Final MND do not meet the criteria for recirculation provided in Section 15073.5 (c) of the CEQA Guidelines. These criteria are provided below, along with an explanation regarding the reasons why the changes to the project do not require recirculation.

Recirculation is not required under the following circumstances:

- (1) *Mitigation measures are replaced with equal or more effective measures pursuant to Section 15074.1.* No mitigation measures have been replaced. However, Mitigation Measure BIO-1 was revised to clarify that seed collection, transplantation, and/or other conservation approaches shall be developed in consultation with appropriate resource agencies to reduce impacts to special-status plant populations. Also, Mitigation Measure **BIO-7** was revised to remove the cited impact acreage for consistency with the revised state and federal wetland permitting approach discussed in RWQCB Response 3 and to clarify that existing data from a previous delineation conducted during the wet season in 2016 will be used to determine the extent of Waters of the State under the pending new State Dredge and Fill Procedures, and to support preparation of the application for a Water Quality Certification and Streambed Alteration Agreement. These revisions address agency concerns and do not reduce the effectiveness of the original mitigation measures.
- (2) *New project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration which are not new avoidable significant effects.* Changes to the Project permitting approach were made in response to the RWQCB's comment letter. These changes ensure wetland mitigation will occur consistent with state requirements. The Project has incorporated all feasible avoidance and these changes do not represent new avoidable significant effects.
- (3) *Measures or conditions of project approval are added after circulation of the negative declaration, which is not required by CEQA, which do not create new significant environmental effects, and are not necessary to mitigate an avoidable significant effect.* As discussed above, minor revisions to Mitigation Measures **BIO-1** and **BIO-7** have been incorporated however no new mitigation measures or conditions have been added.
- (4) *New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.* Mitigation measure revisions only serve to clarify state and federal requirements and do not require recirculation.

## **SECTION 3.0 COMMENTS AND RESPONSES**

This section of the document contains copies of the comment letters received during the 30-day public review period, which began on January 15, 2020, and ended on February 14, 2020. In conformance with Section 15088(a) of the State CEQA Guidelines, the California Conservation Corps has considered comments on environmental issues from reviewers of the Draft IS/MND and has prepared written responses. Three (3) letters and one (1) email were received, commenting on the Draft IS/MND. These letters, and the responses to the comments contained in the letters are provided in this section.

A list of public agencies, organizations, and individuals that provided comments on the Draft IS/MND is presented below. The letters and the responses to the comments follow this page.

### **3.1 List of Comment Letters**

<b>Letter Number</b>	<b>Sender</b>	<b>Date Received</b>
1	Curt Babcock, California Department of Fish and Wildlife	February 11, 2020
2	Tatiana Ahlstrand, California Department of Transportation	February 13, 2020
3	Gil Falcone, North Coast Regional Water Quality Control Board	February 13, 2020
4	Jennifer Riddell, California Native Plant Society	February 14, 2020

**3.2 Letter 1 (CDFW) – Curt Babcock, Habitat Conservation Program Manager,  
Northern Region, California Department of Fish and Wildlife, received  
February 11, 2020**

State of California  
Department of Fish and Wildlife

**M e m o r a n d u m**

Date: February 11, 2020

To: Stephanie Coleman  
Senior Environmental Planner  
Department of General Services

From: **Curt Babcock**  
Habitat Conservation Program Manager  
Northern Region

Subject: **California Conservation Corps, Willits Center (State Clearinghouse #2020019042)**

Dear Ms. Coleman:

On January 21, 2020, California Department of Fish and Wildlife (CDFW) received a Notice of Completion for a draft Initial Study/Mitigated Negative Declaration (ISMND) from the California Conservation Corps (CCC) for the CCC, Willits Center Project (Project) located in Mendocino County, California. As a Trustee for the State's fish and wildlife resources, CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants and the habitat necessary to sustain their populations. As a Responsible Agency, CDFW administers the California Endangered Species Act (CESA) and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources. CDFW offers the following comments and recommendations in our role as a Trustee and Responsible Agency under the California Environmental Quality Act (CEQA; California Pub. Resource Code § 21000 et seq.).

The Project develops a new operations center at 440 East Hill Road in Willits, CA, APN 007-160-18 and 007-100-28. Twelve new buildings, encompassing approximately 64,000 square feet, will be built on the 27.7-acre site, and development will include paved asphalt surfaces for driveways and parking, as well as a paved asphalt emergency crew/vehicle staging area. Further development includes a solar array, a foot trail, and a bridge over a watercourse.

CDFW Region 1 staff were not provided the opportunity to consult on any aspect of this Project, or ISMND prior to receiving the Notice of Completion.

CDFW has three primary concerns with the ISMND:

CDFW-1

1. The Biological Resource Assessment (BRA) does not include rare plant and Sensitive Natural Community (SNC) survey results, despite the potential presence of 24 rare plant species and a SNC. Without baseline knowledge of the presence and extent of these biological resources, CDFW cannot evaluate the potential impacts, determinations of significance, or efficacy of mitigations described in the ISMND.
2. CDFW has determined that impacts to streams and wetlands will be significant, given the buffers proposed, and is concerned about unaddressed impacts due to fire safety management of vegetation.



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- CDFW-1
3. CDFW is unaware of any operating mitigation banks in Mendocino County. Therefore, details of compensatory mitigation, as necessary, should be included in the ISMND so that agencies and the public may adequately review their effectiveness.

Therefore, CDFW recommends the Lead Agency include rare plant and SNC surveys in the ISMND prior to adoption, increase the disturbance buffers for sensitive biological resources, and propose specific compensatory mitigation when necessary. These changes are necessary for CDFW to determine that the Project, as a whole, will have a less than significant impact on biological resources.

**Rare Plants and Sensitive Natural Communities**

- CDFW-2
- Although the ISMND describes the presence of wetlands, riparian vegetation, streams, and two populations of north coast semaphore grass (*Pleuropogon hooverianus*), a rare plant (State Rank 2 – “imperiled”), and the potential presence of up to 23 other species of rare plant, no other botanical surveys are reported for the site. The ISMND conditions further botanical studies in Mitigation BIO-1, which further states that mitigations for impacts to any special status plants may be developed, if present. The ISMND concludes that the mitigation measures described in BIO-1 reduce the potential impacts to all rare plants and SNC to less than significant.

- CDFW-3
- The ISMND also includes a wetland delineation report that describes plants and natural communities on the site. This report differs considerably from the BRA in its description. It maps the riparian trees on the site as “Valley Oak Riparian,” which corresponds to a *Quercus lobata* Woodland Alliance (Valley Oak Woodland), a SNC with State Rank 3 (“vulnerable”). It also describes the grassland community as a “bentgrass meadow,” whereas the BRA describes the grassland as “annual grassland” and provides a list of dominant species that does not include bentgrass (*Agrostis spp.*). This conflicting reporting leaves uncertainty about the natural communities on the site and the potential for SNC.

- CDFW-4
- At the time this ISMND was drafted, definitive information describing the presence and extent of rare plants and SNC could have been known from botanical surveys to accepted protocols. Because these surveys are deferred to a pre-construction date, and due to inconsistencies in existing botanical assessment, there is uncertainty in the environmental setting of the Project. Because this baseline of environmental setting is uncertain, CDFW, other agencies, and the public do not have a basis from which to assess the potential impacts to biological resources, the significance of these potential impacts, or the adequacy of proposed mitigations to reduce the impacts to less than significant. CDFW recommends that the Lead Agency provide the results of rare plant and SNC surveys for all locations that may be impacted by the Project. Survey results should be included in the Initial Study and inform both the Initial Study and Findings of Significance. This should occur prior to notification of intent to adopt this Mitigated Negative Declaration (MND). As needed, specific mitigation and a Mitigation Monitoring Reporting Plan (MMRP) should be provided.

Stephanie Coleman  
Department of General Services  
February 11, 2020  
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### **Wetland, Stream, and Riparian Buffers**

The ISMND identifies 1.07 acres of stream, wetland adjacent to stream, and seasonal wetland depressions at the site. Although many of these features appear to support riparian vegetation, the riparian vegetation is not mapped or buffered. The ISMND approximates direct impacts to 0.006 acres of riparian habitat, and 0.027 acres of waters of the State.

On page 2-11 ("Avoidance Areas") the ISMND states that streams will be protected with a 50-foot buffer, and wetlands with a 25-foot buffer. Project mapping indicates that riparian trees are not included as a buffered resource. Other than the mention of these buffers, the ISMND does not discuss impacts to streams, wetlands, or riparian vegetation other than direct impacts from the installation of a bridge and the filling of two wetlands. Therefore, CDFW assumes that the Lead Agency determines that the proposed buffers are adequate to reduce impacts to wetlands and streams, other than the direct impacts cited, to less than significant.

CDFW-5

In a review of wetland and riparian buffers (CDFW 2014), CDFW concludes that failure to maintain buffers connecting wetland and upland features *"will result in the creation of isolated wetland enclaves scattered throughout highly urbanized areas and result in indirect loss of wetland habitat values."* A review by the Coastal Commission showed that 30 meter-wide to 59 meter-wide (100-foot-wide to 195-foot-wide) buffers are generally accepted in the scientific literature as effectively protecting aquatic resources (California Coastal Commission 2007). CDFW typically recommends habitat buffer widths of at least 150 feet for streams and wetlands (CDFW 2014). Development setbacks of at least 100 feet are commonly employed to minimize indirect impacts to rare plant populations and SNC, however the width and placement of effective and appropriate development setbacks should be site and project-specific and thus should be developed in consultation with CDFW and analyzed and mapped in the Project CEQA document.

Heightened concern for fire-safe buffers around structures is another reason why the proposed buffers are unlikely to be effective. CALFIRE recommends, and insurance companies increasingly require, 100-foot fire-safe buffers around structures. These activities, plus further vegetation removal and land use adjacent to structures, such as the removal of snake habitat discussed in the ISMND, will likely occur within the proposed buffers for streams, wetlands, riparian vegetation, rare plants, and SNC. Consequently, fire safety and land use considerations may impose a need for wider disturbance buffers.

The ISMND should describe adequate disturbance buffers for riparian vegetation, streams, and wetlands. CDFW recommends that the buffer be measured from the dripline of riparian vegetation, top of stream bank when riparian vegetation is absent, or from the delineated edge of wetlands. The buffer should extend, at a minimum, 100 feet from this edge. Furthermore, the ISMND should define appropriate uses within these buffers, and condition them as necessary to reduce impacts to less than significant. Alternatively, the ISMND should propose compensatory mitigation for significant impacts to these resources if adequate buffers cannot be accommodated.



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**Wetland and Riparian Mitigation**

CDFW-6

Mitigation measures BIO-6 and BIO-7 propose the purchase of credits at an approved mitigation bank as a means of compensatory mitigation for permanent impacts. CDFW is unaware of any operating mitigation banks in Mendocino County.

Mitigation measure BIO-6 further proposes that compensatory mitigation for permanent impacts to riparian vegetation will be formulated during CDFW section 1602 permitting along with a MMRP. Similarly, BIO-7 defers compensatory mitigation for permanent impacts to waters of the State to permitting through North Coast Regional Water Quality Control Board and U.S. Army Corps of Engineers.

Since the Lead Agency is able to predict impacts to these resources, and since the Lead Agency is able to consult with responsible agencies to determine the details of adequate and appropriate compensatory mitigation, these impacts and their mitigations should be considered a part of the whole of the Project. Because the whole of the Project should be available for agency and public review, CDFW recommends the Lead Agency include details of proposed mitigations and a draft MMRP in the ISMND prior to notification for adoption.

**Further Considerations**

CDFW-7

Botanists should review recent CDFW guidance regarding grasslands (CDFW 2020) before conducting further surveys at the site. It is sometimes difficult to determine whether a given grassland represents a native grassland impacted by invasive, non-native plants, or whether it is truly a non-native (semi-natural) grassland, as reported in the ISMND.

CDFW-8

Wildlife species evaluated in the ISMND should include grasshopper sparrow (*Ammodramus savannarum*) (Species of Special Concern), white-tailed kite (*Elanus leucurus*) (Fully Protected), and western bumblebee (*Bombus occidentalis ssp occidentalis*) (Candidate for State Listing). The Lead Agency should review the wildlife scoping tables and ensure that no other species are missing from the ISMND analysis.

**Summary of Recommendations**

CDFW-9

1. In order to establish an adequate baseline and environmental setting, the Lead Agency should provide the results of rare plant and SNC surveys for all locations that may be impacted by the Project. These survey results should be included in the Initial Study and inform both the Initial Study and Findings of Significance. This should occur prior to notification of intent to adopt this MND. As needed, specific mitigation and MMRP should be provided.

**California Conservation Corps, Willits Center**  
Final Initial Study and Mitigated Negative Declaration

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Stephanie Coleman  
Department of General Services  
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- |         |   |
|---------|---|
| CDFW-10 | 2. The ISMND should propose adequate disturbance buffers for riparian vegetation, streams, and wetlands. CDFW recommends that the buffer be measured from the dripline of riparian vegetation, top of stream bank when riparian vegetation is absent, or from the delineated edge of wetlands. The buffer should extend, at a minimum, 100 feet from this edge. Alternatively, the ISMND should propose compensatory mitigation for significant impacts to these resources. |
| CDFW-11 | 3. The Lead Agency should, with consultation from responsible and trustee agencies, propose feasible and effective mitigations such that the impacts of the whole of the Project will be less than significant. Compensatory mitigations and a MMRP should be included in the ISMND prior to notification for adoption.   |
| CDFW-12 | 4. Project botanists should review recent CDFW guidance on grassland natural communities before surveying the site.   |
| CDFW-13 | 5. The assessment of impacts to potentially-occurring wildlife should include all potentially-occurring species, including, but not limited to, grasshopper sparrow (Species of Special Concern); white-tailed kite (Fully Protected); and western bumble bee (Candidate for State Listing).  |

Thank you for the opportunity to comment on this draft ISMND. CDFW staff are available to meet with you to consult with or address the contents of this letter in greater depth. If you have questions on this matter or would like to discuss these recommendations, please contact Environmental Scientist Daniel Harrington at (707) 456-0335 or by e-mail at [daniel.harrington@wildlife.ca.gov](mailto:daniel.harrington@wildlife.ca.gov).

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[stephanie.coleman@dgs.ca.gov](mailto:stephanie.coleman@dgs.ca.gov)

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Stephanie Coleman  
Department of General Services  
February 11, 2020  
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### **References**

California Coastal Commission. 2007. Policies in local coastal programs regarding development setbacks and mitigation ratios for wetlands and other environmentally sensitive habitat areas. California Coastal Commission, San Francisco, CA.

California Department of Fish and Wildlife. 2014. Technical Memorandum: Development, Land Use, and Climate Change Impacts on Wetland and Riparian Habitats – A Summary of Scientifically Supported Conservation Strategies, Mitigation Measures, and Best Management Practices. California Department of Fish and Wildlife, Redding, CA. <https://www.wildlife.ca.gov/Regions/1>

California Department of Fish and Wildlife. 2020. Natural Communities – Addressing Grasslands and Flower Fields. California Department of Fish and Wildlife, Sacramento, CA. <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#grasslands>

### **3.2.1 Letter 1 Responses to Comments**

#### **Response to Comment CDFW-1:**

The Biological Resource Assessment (BRA) that was conducted to inform the CEQA document does not typically include protocol-level surveys, such as a special status plant species survey (which includes determination of any Sensitive Natural Communities). However, ECRP conducted a reconnaissance-level survey of all the potential special status species and their habitats. In this particular field visit, ECRP also included a focused survey and mapping of a federally listed plant species (North Coast semaphore grass), as it was previously known to be present within the proposed Project site. As part of the BRA recommendations (Mitigation Measure **BIO-1**), ECRP included a protocol-level special-status plant species survey(s) that would coincide with the blooming period(s) of the potential status plant species referred to in the target list for the Project site. In response to CDFW concerns with language in Mitigation Measure **BIO-1**, the measure has been modified to explicitly require consultation with resource agencies to reduce impacts to special status plant populations in the event they are discovered during protocol-level surveys within the development footprint.

The buffers included in the BRA for avoidance of impacts to streams and wetlands were recommended based on the results of the Preliminary Delineation of Potential Waters of the U.S conducted by LSA. In response to this comment, setbacks were expanded to increase the buffering of the riparian vegetation along the central drainage corridor (See **Figure 4.4-4. Biological Constraints** in Section 4.0, below). With regard to concerns with impacts within the buffer areas associated with vegetation management for fire safety, CCC has indicated that they will not perform any vegetation management within the buffer areas which will be retained as natural features on the site.

Mitigation Measure **BIO-7** in the Draft IS/MND lists possible options for mitigation, including on-site and in-kind wetland habitat creation, or purchase of credits from a mitigation bank, if feasible. The details of the proposed mitigation will be developed through consultation with the agencies as part of the permitting process. It should be noted that Mitigation Measure **BIO-7** has been modified to incorporate existing wet season data in response to comments submitted by the North Coast Regional Water Quality Control Board (See Section 4.0 below). The results of that survey may modify the total acreage of Waters of the State that could be impacted by project implementation but will not change the level of significance or the recommended mitigation to address waters impacts.

**Response to Comment CDFW-2:**

This comment describes the approach taken to addressing impacts to special status plants in the IS/MND including the proposed mitigation and conclusions. See Response to Comment CDFW-1, above, for information regarding the approach to special status plant species. Additionally, the two known populations of north coast semaphore grass are avoided as part of the proposed site plan.

**Response to Comment CDFW-3:**

During the rare plant survey (Mitigation Measure **BIO-1**), ECORP will identify the natural communities on the site according to *A Manual of California Vegetation* (Sawyer et al. 2009). The “valley oak riparian” noted in the wetland delineation is not clearly described, so it would be difficult to conclude that it and the “riparian” noted in the BRA differ considerably. Additionally, neither vegetation type is considered an official alliance type in the *A Manual of California Vegetation* (Sawyer et al. 2009).

**Response to Comment CDFW-4:**

This comment summarizes CDFW’s concerns with not having the results of a special-status plant survey and identification of any potential Sensitive Natural Communities. These issues are addressed above in Response to Comment CDFW-1.

The comment further states that protocol level survey results are needed in the ISMND to ensure that there are no environmental impacts of this project. In response to the comment, the use of pre-construction and protocol-level surveys conducted after preparation of the CEQA document, is a standard means of ensuring adequate mitigation of potentially significant impacts on biological resources and is consistent with State CEQA Guidelines and relevant CEQA case law. Preconstruction and protocol-level surveys allow the Lead Agency to determine whether resources are present prior to initiating construction and take appropriate action to avoid or mitigate potentially significant impacts. This approach is appropriate under CEQA so long as the mitigation measure also identifies potential actions to be taken in the event that preconstruction surveys find significant resources and performance criteria to assure the effectiveness of those actions in mitigating the impact. Development of the project can’t move forward until these performance criteria have been met. The mitigation as proposed includes actions to be taken and performance criteria consistent with CEQA case law. Additionally, if additional state listed plants are identified on the site, CDFW will be consulted to determine appropriate mitigation.

**Response to Comment CDFW-5:**

This comment summarizes CDFW's concerns with mapping wetland and riparian vegetation buffers of this resource, and fire safety. These issues are addressed above in Response to Comment CDFW-1.

Additionally, the Project site is not under the jurisdiction of the California Coastal Commission. The CDFW recommended buffer of at least 150 feet appears to stem from a variety of studies included in a 2014 Technical Memorandum (CDFW 2014). Many of these studies reference the need for larger buffers as being tied to maintaining habitat for various flora and fauna, as well as limiting water quality and human trash impacts. These studies refer to the need for larger buffers to maintain habitat for avian biodiversity, mammal predators, salamanders, and riparian associated fauna (CDFW 2014). The quote referenced in this document refers to the "ecological bond between wetlands and associated uplands" (CDFW 2014).

This Project is located adjacent to US-101, commercial uses, and an old railroad corridor, so it is not pristine habitat that is undisturbed by adjacent uses. The site has also been used historically for agricultural purposes. This site is located south of Haehl Creek, a dense riparian corridor with higher quality riparian habitat, that will not be impacted by this project, and other than a walking trail, the closest impact is more than 200 feet away from this creek.

If 100- to 150-foot buffers were to be employed around all riparian vegetation, streams, and wetlands on this project, then not only would this project not be feasible on this property, it would put severe constraints on any potential project at this location. The buffers included in the project protect all riparian vegetation adjacent to the two primary drainages near the center of the site and some adjacent upland habitat. As described in Response to comment CDFW-1, the setback has been expanded to increase the buffering of the riparian vegetation along the central drainage corridor (See Section 4.0 below).

California Department of Fish and Wildlife. 2014. Technical Memorandum: Development, Land Use, and Climate Change Impacts on Wetland and Riparian Habitats – A Summary of Scientifically Supported Conservation Strategies, Mitigation Measures, and Best Management Practices. California Department of Fish and Wildlife, Redding, CA. <http://www.wildlife.ca.gov/Regions/1.file:///C:/Users/kday/Downloads/CDFW%20Region%201%20Wetland%20and%20Riparian%20Technical%20Memorandum%205-21-14.pdf>

**Response to Comment CDFW-6:**

CDFW commented that they are unaware of mitigation banks within Mendocino County, and the Lead Agency should consider permittee-responsible mitigation as part of the whole project and include details regarding the mitigation plan within the IS/MND. The options for mitigation are addressed above in Response to Comment CDFW-1.

In response to whether mitigation should be considered a part of the whole project, developing a mitigation plan as part of agency permitting is a standard means of ensuring adequate mitigation of potentially significant impacts on biological resources and is consistent with State CEQA Guidelines and relevant CEQA case law. Agency permitting following protocol surveys allows agencies to determine whether resources are present prior to initiating construction and take appropriate action to avoid or mitigate potentially significant impacts. This approach is appropriate under CEQA so long as the



mitigation measure also identifies potential actions to be taken in the event that preconstruction surveys find significant resources and performance criteria to assure the effectiveness of those actions in mitigating the impact. Development of the project can't move forward until these performance criteria have been met. The mitigation as proposed includes actions to be taken and performance criteria consistent with CEQA case law.

**Response to Comment CDFW-7:**

Per CDFW's recommendation, ECORP reviewed CDFW's guidance on grassland natural communities and ECORP concurs with the nomenclature presented. The discrepancies brought up in the letter from CDFW refers to the bentgrass grassland identified in the wetland delineation report as the predominant grassland species (*Agrostis stolonifera*) found during the wetland delineation site visit conducted in November 2018. This species typically blooms between July and August. The BRA site visit was conducted in May, when the bentgrass would not likely have been identifiable. The planned special-status plant survey will include mapping of vegetation alliances according to *A Manual of California Vegetation*.

**Response to Comment CDFW-8:**

An errata has been added into the ISMND to incorporate these three species to the list of potentially occurring species. It is important to note, that the western bumblebee was not considered a California Special Status Species Candidate at the time that the BRA was completed (June 2019); with candidate status not publicized until July 2019).

**Response to Comment CDFW-9:**

Please see Response to Comment CDFW-1.

**Response to Comment CDFW-10:**

Please see Response to Comments CDFW-1 and CDFW-5.

**Response to Comment CDFW-11:**

Please see Response to Comment CDFW-1 and 6.

**Response to Comment CDFW-12:**

Please see Response to Comment CDFW-7.

**Response to Comment CDFW-13:**

Please see Response to Comment CDFW-8.



**3.3 Letter 2 (DOT) – Tatiana Ahlstrand, Transportation Planning, District 1,  
California Department of Transportation, received February 13, 2020**

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

**DEPARTMENT OF TRANSPORTATION**

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Making Conservation  
a California Way of Life.

February 13, 2020

Stephanie Coleman  
Senior Environmental Planner  
California Conservation Corps  
707 Third Street, 4<sup>th</sup> Floor  
Sacramento, CA 95811

1-MEN-20-45.1  
CCC Willits Center  
SCH: 2020019042

Dear Stephanie Coleman:

Thank you for the opportunity to comment on the draft Initial Study and Mitigated Negative Declaration for the California Conservation Corps (CCC) center in the City of Willits. The project proposes to construct a new CCC residential center that includes a total of approximately 64,000 square feet of new building construction, including an administration building, seven dormitories, an education building, recreation building, among others.

The proposed 27.7-acre site is located north of East Hill Road, bounded by the US Highway 101 bypass on the east and the former Northwestern Pacific Railroad corridor on the west. Although the project is adjacent to the US 101 bypass, the closest affected state highway intersection is on State Route 20 with the intersection of Main Street and Baechtel Road (south) (1-MEN-20-45.1). We have the following comments as this project moves forward:

**Traffic Operations**

DOT-1

In the Traffic Impact Analysis included in the Draft IS/MND (Appendix C), traffic volumes were measured in 2-hour intervals, both morning and evening, to determine peak 1-hour volumes for traffic signal warrant #3. No other warrants were evaluated. As documented in the Traffic Impact Analysis, the satisfaction of a traffic signal warrant, or warrants, does not require the installation of a traffic control signal.

To assist in determining when signal installation may be required, we request the following information be provided:

DOT-2

1. Provide justification for the 1%/year growth factor used.

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- DOT-3 | 2. Provide justification for the 15%/85% split between north and south Baechtel Road intersections with Main Street.
- DOT-4 | 3. Provide 13-hour Intersection Turning Movement Counts, in 15-minute increments, which include the AM and PM peak-hour periods for a weekday (Tuesday, Wednesday, and/or Thursday) and weekends for the intersection at south Baechtel Road/Main Street. Counts should not be performed during weeks with a holiday. Please include bicycle and pedestrian counts.
- DOT-5 | 4. Evaluation of traffic signal warrants 1, 2, 4, & 7 (south Baechtel Road/Main Street intersection).
- DOT-6 | 5. Provide the modeling files to the District.
- DOT-7 | Based on the requested information provided, we may also request the applicant perform an Intersection Control Analysis (ICE), in accordance with Caltrans Traffic Operations Policy Directive (TOPD) 13-02. Information about this can be located on our website at: <https://dot.ca.gov/programs/traffic-operations/policy>.

**System Planning and Right of Way**

- DOT-8 | The Caltrans District 1: US 101 Transportation Concept Report (October 2017) evaluates current and projected conditions along the route and communicates the long-range vision for the development of the route. For the section of US 101 in Willits (Willits Bypass, T43.50-48.44), the 20 Year Facility Concept is to upgrade to a 4-lane facility.
- Although there is no conflict with right of way, it is worth noting that no access to or from the project parcel to US 101 is allowed, as Caltrans purchased those rights when the freeway right of way was acquired.

**Hydraulics**

- DOT-9 | There is currently poor drainage and seasonal flooding at the southeast corner of the project along East Hill Road at Sanhedrin Circle. A hydraulic analysis should be performed for the project ensuring all existing facilities can handle the expected flows. The analysis should show pre-flows, post-flows and demonstrate that any new runoff generated by the project does not exasperate the issue.

**Environmental**

- DOT-10 | Be advised that there are environmental mitigation sites associated with the Willits Bypass project which are located adjacent to the proposed project. Please ensure these sites are not impacted by the work that is being proposed.

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**Tribal Consultation**

DOT-11

We recommend thorough consultation with the Native American Tribes throughout the life of the project.

**Encroachment Permits**

DOT-12

It does not appear that any work will take place within Caltrans right of way. However, if work will be proposed with state right of way, it will require an encroachment permit. Permit applications are reviewed for consistency with State standards and are subject to Department approval. To streamline the application and review process, we require the applicant consult with our Permit staff prior to application submittal.

Request for Permit applications can be sent to: Caltrans District 1 Permits Office, P.O. Box 3700, Eureka, CA 95502-3700, or requested by phone at (707) 463-4743.

We look forward to working with you as this project moves forward. Please feel free to contact me with any questions about the comments outlined in this letter or for further assistance: (707) 441-4540 or [tatiana.ahlstrand@dot.ca.gov](mailto:tatiana.ahlstrand@dot.ca.gov).

Sincerely,



TATIANA AHLSTRAND  
Transportation Planning

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

### **3.3.1 Letter 2 Responses to Comments**

#### **Response to Comment DOT-1:**

Comment noted and provided for consideration by the Lead Agency.

#### **Response to Comment DOT-2:**

A growth rate of 1%/year was used to develop opening year (2023) volumes. This rate was used based on a review of growth in the area. The growth rate of 1%/year is consistent with other projects completed in the region.

#### **Response to Comment DOT-3:**

The trip distribution was developed based the operational characteristics of the Project and the location of nearby land uses and freeway access. While some staff and visitor trips may begin or end in the City of Willits, it was assumed that a majority of the trips would begin or end outside of the City of Willits. As this Project is replacing a similar project in Ukiah, it was assumed that worker and visitor trips may come from the Ukiah area and would use US-101 access to the south of the site. In addition, the operational characteristics of the project require crew trips to be distributed throughout the region and would therefore need access to US-101, the closest access to which is south of the site.

#### **Response to Comment DOT-4:**

All intersection count data collected at Baechtel Road/Main Street is included in Appendix B of the report. In order to accommodate intersection LOS analysis, the data was collected in May 2019 on a Thursday on a non-holiday week. Data was collected in 15-minute increments for the 2-hour AM and PM peak period.

#### **Response to Comment DOT-5:**

The purpose of the traffic analysis was to identify intersection impacts. Impacts at an unsignalized intersection were identified if the intersection has an unacceptable level of service and meets peak hour signal warrants. Therefore, Signal Warrants 3A and 3B were run to determine if an impact occurred at an unsignalized intersection. As noted on Page 21 and Page 28 of the report, "Unsignalized intersection warrant analysis is intended to examine the general correlation between existing conditions and the need to install new traffic signals. Existing peak-hour volumes are compared against a subset of the standard traffic signal warrants recommended in the MUTCD and associated State guidelines. This analysis should not serve as the only basis for deciding whether and when to install a signal. To reach such a decision, the full set of warrants should be investigated based on field-measured traffic data and a thorough study of traffic and roadway conditions by an experienced engineer. Furthermore, the decision to install a signal should not be based solely on the warrants because the installation of signals can lead to certain types of collisions. The responsible State or local agency should undertake regular monitoring of actual traffic conditions and accident data and conduct a timely re-evaluation of the full set of warrants in order to prioritize and program intersections for signalization." While the traffic study determined that a traffic signal would mitigate the identified impact, the decision to install a traffic signal is outside the control of

the Project applicant. The traffic study acknowledges that all warrants should be evaluated in addition to regular monitoring of traffic conditions. Therefore, all traffic signal warrants should be reviewed at the time of any potential traffic signal installation.

**Response to Comment DOT-6:**

The Vistro file was forwarded to the District for their review. This file was built in Vistro 7.

**Response to Comment DOT-7:**

Comment noted and provided for consideration by the Lead Agency.

**Response to Comment DOT-8:**

Comment noted and provided for consideration by the Lead Agency.

**Response to Comment DOT-9:**

Hydraulic analysis will be prepared in support of Project development. It should be noted that the area identified in the comment will be retained as open space and no development will occur within the southeast corner of the site adjacent to East Hill Road.

**Response to Comment DOT-10:**

Willits Bypass environmental mitigation sites will not be impacted by Project construction or operations.

**Response to Comment DOT-11:**

Consultation with Native American Tribes has been completed. Refer to *Section 4.18.2 Regulatory Setting* in the Tribal Cultural Resources Section of the Draft IS/MND.

**Response to Comment DOT-12:**

No encroachment will occur on Caltrans right-of-way.

### 3.4 Letter 3 (RWQCB) – Gil Falcone, Senior Environmental Scientist, Supervisor Southern 401 Certification Unit, North Coast Regional Water Quality Control Board, received February 13, 2020

**From:** [Coleman, Stephanie@DGS](mailto:Coleman.Stephanie@DGS)  
**To:** [Chris Stabenfeldt](#); [Mark Morse](#)  
**Subject:** FW: CCC Willits Center SCH #2020019042  
**Date:** Thursday, February 13, 2020 4:40:23 PM

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FYI

**STEPHANIE COLEMAN** | Project Management and Development Branch | Environmental Section  
**Senior Environmental Planner** | **Environmental Services** | o **916.376.1602** c **916-217-6185** | [Stephanie.coleman@dgs.ca.gov](mailto:Stephanie.coleman@dgs.ca.gov)

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**From:** Falcone, Gil@Waterboards <Gil.Falcone@waterboards.ca.gov>  
**Sent:** Thursday, February 13, 2020 3:52 PM  
**To:** Coleman, Stephanie@DGS <Stephanie.Coleman@dgs.ca.gov>  
**Cc:** Filak, Jordan@Waterboards <Jordan.Filak@Waterboards.ca.gov>; Harrington, Daniel@Wildlife <Daniel.Harrington@Wildlife.ca.gov>  
**Subject:** CCC Willits Center SCH #2020019042

Dear Stephanie Coleman,

Thank you for the opportunity to comment on the California Conservation Corps, Willits Center State Clearinghouse CEQA Draft IS/MND #2020019042.

RWQCB-1

The Regional Water Board's Water Quality Control Plan for the North Coast Basin (Basin Plan) and the California Water Code define waters of the state as follows: "'Waters of the state' refers to any surface water or groundwater, including saline waters, within the boundaries of the state (Water Code §13050 (e))." This definition is broader than that of "waters of the United States" and consequently should always be acknowledged and considered when determining impacts upon water resources.

RWQCB-2

Any adverse impacts to, or loss of, wetlands and waters of the state and their beneficial uses due to development and construction activities must be fully permitted and mitigated. Impacts to waters of the state should first be adequately evaluated to determine if the impacts can be avoided or minimized. All efforts to first avoid and second to minimize impacts to waters of the state must be fully exhausted prior to deciding to mitigate for their loss. If a project's impacts to waters of the state are deemed unavoidable, then compensatory mitigation (for acreage, function and value) will be necessary for any unavoidable impacts. We appreciate efforts within the planning and design of the project that have avoided impacts to aquatic resources. The IS/MND discusses mitigation for wetlands and Riparian communities through purchase at mitigation banks, however, we are not aware of any mitigation banks that have a service area that includes Willits, CA. Therefore, any mitigation of aquatic resources after all avoidance and minimization measures have been taken will need to be proposed with preference to onsite and in-kind if feasible and then if necessary other alternatives will be considered. Onsite mitigation for wetlands that would require years to become successful would need to be mitigated at a *greater* ratio than 1:1, please consult with the US Army Corps of Engineers mitigation ratio calculator and plan your site designs accordingly for any required mitigation.



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RWQCB-3

Additionally, the wetland delineation appears to have been conducted on November 8, 2018, which is during a dry time of year when it may be very difficult to accurately identify and quantify wetland plant species. The State Water Board's Dredge and fill procedures that will be effective May 28, 2020, Section IV.A.2.a of the Procedures states that Water Board staff may require, on a case-by-case basis, supplemental field data from the wet season to substantiate dry season delineations. This is consistent with our current regional practice.

RQWCB-4

Generally, wet season delineations are more likely to be necessary in areas where wetland indicators are difficult to resolve. The ideal time to delineate a wetland is during the wet portion of the growing season of a normal climatic period. Otherwise, indicators provided in the Corps' delineation manuals must be relied on to identify wetland boundaries. Collection of supplemental information in certain situations is an accepted practice and is consistent with recommendations presented in the Corps regional supplements for wetland delineation, which recommends that practitioners return to the delineation site, if possible, during the "normal wet portion of the growing season" (Arid West Regional Supplement, pp. 58, 87, 104; Western Mountains, Valleys, and Coast Regional Supplement, pp. 66, 100) to resolve wetland indicators that were unresolved during the dry-season delineation. To avoid the risk of unanticipated project delays, we would suggest supplementing the dry season findings with wet season findings.

For additional information about dredge and fill permitting including applications, fees and submittals please visit our water quality certification program website:  
[https://www.waterboards.ca.gov/northcoast/water\\_issues/programs/water\\_quality\\_certification/](https://www.waterboards.ca.gov/northcoast/water_issues/programs/water_quality_certification/)

I am happy to discuss our water quality permitting as the project progresses to that phase or anytime along the way should questions arise.

Thanks you again for the opportunity to comment on this valuable project for the California Conservation Corps in Willits.

Regards,

Gil

**Gil Falcone**

Sr. Environmental Scientist, M.S.  
Supervisor Southern 401 Certification Unit  
North Coast Regional Water Quality Control Board  
5550 Skylane Blvd., Suite A  
Santa Rosa, CA 95403-1072

Voice (707) 576-2830  
<https://www.waterboards.ca.gov/northcoast/>

### **3.4.1 Letter 3 Responses to Comments**

#### **Response to Comment RWQCB-1:**

The RWQCB commented that the definition of Waters of the State is broader than that of Waters of the U.S. All references to aquatic resources throughout the IS/MND are phrased as "Waters of the U.S./State". It is the intention of the document to apply to all aquatic resources whether Waters of the U.S. or Waters of the State, and avoidance areas within the project have been designed to avoid Waters of the State (i.e. riparian areas), as well as Waters of the U.S. See Response to Comment RWQCB-3.

**Response to Comment RWQCB-2:**

Comment two discusses the need for avoidance and minimization as well as compensatory mitigation, and states that no mitigation banks are present within the project vicinity. Impacts to aquatic resources have been avoided and minimized to the extent feasible by designing the land use plan to incorporate a minimum 25-foot setback (where feasible) around all aquatic resources and a 50-foot setback around the central drainage corridor. Mitigation Measure BIO 7 in the Draft IS/MND lists several possible options for mitigation, including on-site and in-kind wetland habitat creation. The details of the proposed mitigation will be developed through consultation with the agencies as part of the permitting process. It is understood that RWQCB prefers on-site and in-kind wetland habitat creation; however, other agencies may prefer a different approach, and a mitigation strategy will need to be prepared to address all agency requirements. Please also see Responses to Comments CDFW-1 and CDFW-5.

**Response to Comment RWQCB-3:**

Comment three states that the wetland delineation used to support the IS/MND was conducted during the dry season, and per the new State Dredge and Fill Procedures to be implemented in May 2020, supplemental data from the wet season may be needed to support the delineation. The delineation used to support the IS/MND received a PJD from the USACE on February 21, 2019 and is anticipated to be used in the Clean Water Act Section 404 permitting process as it is the most recent PJD for the site. However, in light of the Regional Board's comments and the pending new Dredge and Fill Procedures, supplemental data from a previous aquatic resources delineation will be used to determine the extent of Waters of the State and prepare the application for the RWQCB Water Quality Certification and the CDFW Streambed Alteration Agreement. This previous delineation was prepared for the property in March of 2016 by Gari Hulse-Stephens, Botanical Consultant. Survey work for the 2016 delineation was conducted in February and March of 2016 and received a PJD from the USACE on August 17, 2017. Cumulative precipitation for the 2015-2016 Water Year at March 1, 2016 was 114% of the 30-year normal for that date. Therefore, the conditions during the 2016 delineation were consistent with the request by the RWQCB to supplement the delineation used in the IS/MND with data collected during the wet season. The 2016 delineation identified 2.24 acres of wetlands and waters in comparison to the 1.07 acres identified in the delineation cited in the Draft IS/MND. This change is reflected in revised Mitigation Measure **BIO-7**.

**Response to Comment RWQCB-4:**

See response to Comment RWQCB-3.



**3.5 Letter 4 (CNPS) – Jennifer Riddell, Co-President, Sanhedrin Chapter, California Native Plant Society, received February 14, 2020**



Date: February 14, 2020

To: Stephanie Coleman, Senior Environmental Planner, Department of General Services  
From: Jennifer Riddell, Sanhedrin Chapter, California Native Plant Society  
Regarding: California Conservation Corps, Willits Center (State Clearinghouse #2020019042)

The California Native Plant Society is a statewide organization dedicated to the preservation of native plants and their natural habitats, and to increasing understanding, appreciation, and horticultural use of native plants since 1965. The Sanhedrin Chapter of the California Native Plant Society comprises the inland part of Mendocino County and all of Lake County, and has been active in the area since 1981. Our members are composed of land managers, and both amateur and professional plant scientists.

We had an opportunity to briefly view the plans and environmental document for the East Hill Road CCC development project just west of the Willits Bypass and just east of the Southern Pacific Railroad line on East Hill Road, Willits, Mendocino County, CA.

CNPS-1

We are concerned that the amount of acreage that the USACE accepted in their PJD in 2017 (file number 2017-00049- final map produced by the Corps August 17, 2017) was twice the acreage that was determined as wetlands in this report.

CNPS-2

We are also concerned about setbacks from wetland features as shown on the site development map. It is difficult to determine the scale of the accompanying site plan map (100ft to inch) printed on a 8.5 x 11 or an 11 x 17 format. We are not sure but it appears that setbacks from the wetland would be 10 to 12 feet if it is the former or approximately 25 feet if it is the latter. We would like to see a 50-foot setback in this case because this type of seasonal wetland system is supported by cross-field flows and events that charge them are flashy, developing and spreading during and shortly after storms. A larger buffer supports this natural expansion, flow and contraction that connects wetland features.

Additionally, care should be taken in creating crossings in the middle of seasonal wetland features. If these kinds of wetlands are bisected or linked only by a pipe under a road the integrity of the system would be compromised.

Sincerely,

Jennifer Riddell  
Co-President, Sanhedrin Chapter, California Native Plant Society

*Protecting California's native flora since 1965*

2707 K Street, Suite 1 Sacramento, CA 95816-5113 • Tel: (916) 447-2677 • www.cnps.org  
**Sanhedrin Chapter 725 Vichy Hills Drive, Ukiah CA 95482**

**3.5.1 Letter 4 Responses to Comments**

**Response to Comment CNPS-1:**

This comment states that the delineation used to support the IS/MND differed from a previous delineation which was verified by USACE in 2017. The delineation used to support the IS/MND received a PJD from the USACE on February 21, 2019. Therefore, the delineation with the most current PJD was used in support of the analysis in this Initial Study. However, based on this and other comments, data from the 2016 delineation will be used to determine the extent of Waters of the State and to support permitting under state regulations (e.g. Streambed Alteration Agreement and Water Quality Certification; see Response to Comment RWQCB-3 and CDFW-1).

**Response to Comment CNPS-2:**

CNPS commented that the setbacks from aquatic resources should be expanded to 50 feet. Currently, a 50-foot setback from the North Coast semaphore grass is proposed in the Project Site Plan, and 25- (where feasible) to 50-foot setbacks from the aquatic resources (setbacks are 25 feet around smaller drainages to the southeast, and 50 feet around the larger riparian corridor through the center of the Project). Also see Response to Comments CDFW-1 and CDFW-5.

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## SECTION 4.0 REVISIONS TO THE DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

As a result of minor Project changes and comments received on the Draft IS/MND, revisions have been made to the Draft IS/MND text. These revisions include minor changes to the Project Description, clarification of impacts and minor revisions to mitigation measures, and do not constitute substantial revisions that would require recirculation of the document. According to Section 15073.5 of the CEQA Guidelines, "a substantial revision shall mean:

- (1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or
- (2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required."

The revisions are provided below. Changes in text are identified by ~~strikeout~~ where text is removed and by underline where text is added.

### Section 4.4 Biological Resources

The following text was added/revised based on comments received within the CDFW letter:

Page 4-42, Invertebrates Paragraph:

#### Invertebrates

No special-status invertebrate species were identified as having potential to occur within the Project Site based on the literature review (*Appendix B, Table 2*); however, the western bumble bee is a candidate for listing as endangered under the California Endangered Species Act (CESA). ~~No further discussion of invertebrate species is provided in this analysis.~~

#### Western Bumble Bee

The western bumble bee (*Bombus occidentalis*) is a candidate for listing as endangered under the California Endangered Species Act (CESA). The western bumble bee was once common in the western United States but is now absent across much of its historic range (Xerxes 2018). In California, the species is largely restricted to high elevation sites in the Sierra Nevada (Xerxes 2018 although there have been a couple observations on the northern California coast (Xerxes 2018). The species inhabits meadows and grasslands with abundant floral resources, and primarily nests underground in cavities created by ground dwelling animals although a few nests have been reported above-ground in logs or among railroad ties (Xerxes 2018). Little is known about specific overwintering sites, but bumble bees generally overwinter in soft, disturbed soils or under leaf litter or other debris (Goulson 2010, Williams et al. 2014). The species visits a wide variety of flowering plants, but its short tongue is most suitable for foraging at open flowers with short corollas (Xerxes 2018). The flight period for queens in California is from early February to late November (Thorpe et al. 1983). The flight period for workers and males in California is from early April to

early November (Thorpe et al. 1983). Significant threats are posed to the survival of this species by modification or destruction of its habitat, overexploitation, competition, disease, pesticide use, population dynamics and structure, and global climate change (Xerxes 2018).

There are no CNDDDB documented occurrences of western bumble bee within five miles of the Project site (CDFW 2020). The grassland community on the Project site provides marginally suitable habitat for this species. Western bumble bee has low potential to occur onsite.

Page 4-4, Birds Paragraph

## **Birds**

There are seven special-status bird species that were identified as having potential to occur within the Project Site based on the literature review (*Appendix B, Table 2*). Upon further analysis and after the reconnaissance site visit, ~~four~~ two species were considered to be absent from the Project Site due to the lack of suitable habitat. No further discussion of these species is provided in this analysis. A brief description of the remaining ~~three~~ five special-status bird species that have the potential to occur within the Project Site is presented below.

### White-tailed Kite

White-tailed kite (*Elanus leucurus*) is not listed pursuant to either the California or federal Endangered Species Acts; however, the species is fully protected pursuant to Section 3511 of the California Fish and Game Code. This species is a common resident in the Central Valley and the entire length of the California coast, and all areas up to the Sierra Nevada foothills and southeastern deserts (Dunk 1995). In northern California, white-tailed kite nesting occurs from March through early August, with nesting activity peaking from March through June. Nesting occurs in trees within riparian, oak woodland, savannah, and agricultural communities that are near foraging areas such as low elevation grasslands, agricultural, meadows, farmlands, savannahs, and emergent wetlands (Dunk 1995).

There are no CNDDDB documented occurrences of white-tailed kite within five miles of the Project site (CDFW 2020). Trees within the riparian community on the Project site provide suitable nesting habitat for this species. White-tailed kite has potential to occur onsite.

### Grasshopper Sparrow

The grasshopper sparrow (*Ammodramus savannarum*) is not listed pursuant to either the California or federal Endangered Species Acts, but it is designated as a species of special concern by the CDFW. The grasshopper sparrow is an uncommon and local, summer resident and breeder along the western edge of the Sierra Nevada and most coastal counties south to Baja California (Small 1994, Vickery 1996). This species generally inhabits moderately open grasslands and prairies with patchy bare ground and scattered shrubs (Vickery 1996). Grasshopper sparrows are more likely to occupy large tracts of habitat than small fragments (Samson 1980, Herkert 1994a, Vickery et al. 1994 as cited in Vickery 1996). Breeding generally occurs from early May through August.

There are no CNDDDB documented occurrences of grasshopper sparrow within five miles of the Project site (CDFW 2020). The annual grassland community on the Project site provides suitable nesting habitat for this species. Grasshopper sparrow has potential to occur onsite.

Page 4-55, Invertebrates and Fish Paragraph

### **Invertebrates and Fish**

The Project Site does not provide suitable habitat for any currently listed special-status invertebrate or fish. Therefore, there would be no impact and these species are not discussed further.

Page 4-55, Birds Paragraph

### **Birds**

Suitable nesting and/or wintering and foraging habitat for white-tailed kite, sharp-shinned hawk, yellow-grasshopper sparrow, breasted chat, and yellow warbler is present on the Project Site. If nesting individuals are present during construction, the Project could result in harassment to nesting individuals and may temporarily disrupt foraging activities.

Page 4-59, Last Paragraph

As discussed above, depending on final design, Project development is expected to result in the permanent loss of up to ~~±0.027 acre~~ of seasonal wetland and 0.003 acre of non-wetland Waters of the US. This loss would be considered a potentially significant impact. This impact can be reduced to less than significant with implementation of Mitigation Measure **BIO-7**.

Page 1-2 First Paragraph and Page 4-60 Last Paragraph

**BIO-1: Conduct Pre-Construction Sensitive Plant Surveys.** The following shall be conducted prior to initiation of Project construction:

- Perform focused plant surveys according to USFWS, CDFW, and CNPS protocols. Surveys should be timed according to the blooming period for target species and known reference populations, if available, and/or local herbaria should be visited prior to surveys to confirm the appropriate phenological state of the target species. If additional special-status plant species are found during surveys within the Project Site (aside from the two mapped populations of Northern Semaphore grass) and avoidance of the species is not possible, seed collection, transplantation, and/or other conservation approaches ~~may shall~~ be developed in consultation with appropriate resource agencies to reduce impacts to special-status plant populations. If no additional special-status plants are found on the Project Site, no further measures pertaining to special-status plants are necessary.

Page 1-4 First Paragraph and Page 4-62 Last Paragraph

**BIO-7: Compensate for the Permanent Loss of Wetlands/Waters of the United States/Waters of the State.** To compensate for the permanent loss of ~~±0.027 acre of~~ Waters of the U.S./State, DGS shall obtain Section 404 and 401 Permits from the USACE and RWQCB and either create replacement wetland habitat

or purchase credits at an agency-approved mitigation bank to ensure no net loss of wetland functions and values. The wetland compensation ratio will be a minimum of 1:1 (one acre of wetland habitat credit for every one acre of impact) to ensure no net loss of wetland habitat functions and values. The DGS will also implement the conditions and requirements of state and federal permits that will be obtained for the Proposed Project. The actual mitigation ratio and associated credit acreage may be modified based on final design and USACE and RWQCB permitting which will dictate the ultimate compensation for permanent impacts to Waters of the U.S./ State. Alternatively, DGS shall provide a Wetland Habitat Mitigation Plan for USACE and RWQCB approval that identifies appropriate wetland creation, success criteria and monitoring and reporting requirements consistent with the Project's Section 404 and 401 Permit conditions. Furthermore, existing data from a previous delineation conducted during the wet season in 2016 will be used to determine the extent of Waters of the State under the pending new State Dredge and Fill Procedures, and to support preparation of the application for a Water Quality Certification and Streambed Alteration Agreement.

## **Figures**

**Figure 4.4-4. Biological Constraints** Page 4-56.

**Figure 4.4-4.** has been changed to reflect the expansion of the sensitive resources buffer as well as inclusion of this buffer into the key on the right-hand side of the graphic.

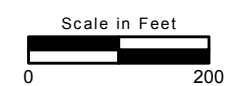
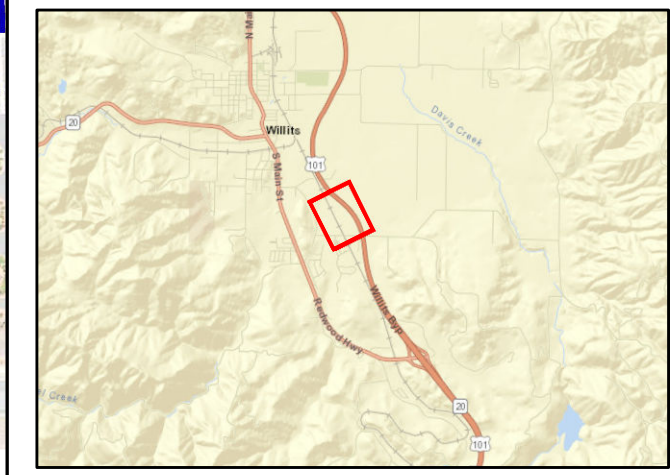


ECORP: N:\2018\2018-116.005 CCC Replace Ukiah Center\MAPS\ssss\_survey\_and\_mapping\Ukiah\_BRA\_BioResources\_20190613\_wSitePlan.mxd (JDSCCH)-Jswager 3/3/2020



- Map Features**
- Project Area
  - Impacted Wetlands
  - Potentially Impacted Wetlands
  - Sensitive Resources Buffer
- Plants**
- North Coast Semaphore Grass
- Aquatic Resources**
- Adjacent Seasonal Wetlands
  - Seasonal Wetland Depressions
  - Non-Wetland Waters

Sources: ESRI, LSA, NMR Design



**DRAFT**

**Figure 4.4-4. Biological Constraints**  
2018-116.005 CCC Willits Center



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## SECTION 5.0 MITIGATION MONITORING AND REPORTING PLAN

### 5.1 Introduction

In accordance with CEQA, an MND that identifies adverse impacts related to the construction activity for the California Conservation Corps, Willits Center was prepared. The MND identifies mitigation measures that would reduce or eliminate these impacts.

Section 21081.6 of the Public Resources Code and Sections 15091(d) and 15097 of the State CEQA Guidelines require public agencies to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. A MMRP is required for the Proposed Project, because the IS/MND identified potentially significant adverse impacts related to construction and operation of the proposed Project, and mitigation measures have been identified to mitigate these impacts. Adoption of the MMRP will occur along with approval of the Proposed Project.

### 5.2 Purpose of the Mitigation Monitoring and Reporting Plan

This MMRP has been prepared to ensure that all required mitigation measures are implemented and completed according to schedule and maintained in a satisfactory manner during the construction and operation of the Proposed Project, as required. The MMRP may be modified by the California Conservation Corps or DGS/RESO during project implementation, as necessary, in response to changing conditions or other project refinements. **Table 5-1** has been prepared to assist the responsible parties in implementing the MMRP. This table identifies the category of significant environmental impact(s), individual mitigation measures, monitoring and mitigation timing, responsible person/agency for implementing the measure, monitoring and reporting procedure, and notation space to confirm implementation of the mitigation measures. The numbering of the mitigation measures follows the numbering sequence in the IS/MND.

### 5.3 Roles and Responsibilities

The California Department of General Services (DGS) is responsible for oversight of compliance of the mitigation measures in the MMRP.

### 5.4 Mitigation Monitoring and Reporting Plan

The column categories identified in the MMRP table (**Table 5-1**) are described below.

- **Mitigation Measure** – This column lists the mitigation measures by number.
- **Monitoring Activity/Timing/Frequency/Schedule** – This column lists the activity to be monitored for each mitigation measure, the timing of each activity, and the frequency/schedule of monitoring for each activity.

- **Implementation Responsibility/Verification** – This column identifies the entity responsible for complying with the requirements of the mitigation measure, and provides space for verification initials and date.
- **Responsibility for Oversight of Compliance/Verification** – This column provides the agency responsible for oversight of the mitigation implementation, and is to be dated and initialed by the agency representative based on the documentation provided by the construction contractor or through personal verification by agency staff.
- **Outside Agency Coordination** – this column lists any agencies with which DGS may coordinate for implementation of the mitigation measure.
- **Comments** – this column provides space for written comments, if necessary.

**Table 5-1**  
**California Conservation Corps, Willits Center**  
**Mitigation Monitoring and Reporting Program**

Mitigation Measure	Implementation Actions and Timing	Implementation Responsibility	Responsibility for Oversight of Compliance/ Verification	Agency Coordination	Comments
<p><b>BIO-1: Conduct Pre-Construction Sensitive Plant Surveys</b></p> <p>The following shall be conducted prior to initiation of Project construction:</p> <ul style="list-style-type: none"> <li>Perform focused plant surveys according to USFWS, CDFW, and CNPS protocols. Surveys should be timed according to the blooming period for target species and known reference populations, if available, and/or local herbaria should be visited prior to surveys to confirm the appropriate phenological state of the target species. If additional special-status plant species are found during surveys within the Project Site (aside from the two mapped populations of Northern Semaphore grass) and avoidance of the species is not possible, seed collection, transplantation, and/or other conservation approaches shall be developed in consultation with appropriate resource agencies to reduce impacts to special-status plant populations. If no additional special-status plants are found on the Project Site, no further measures pertaining to special-status plants are necessary.</li> </ul>	<p><b>Action:</b></p> <p>Sensitive plant surveys</p> <p><b>Timing:</b></p> <p>Designate Approved Biologist: Prior to construction activity.</p> <p>Surveys: Prior to the start of construction, during blooming period for target species.</p>	<p>Project Biologist</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DGS/RESD</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	USFWS, CDFW	

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Mitigation Measure	Implementation Actions and Timing	Implementation Responsibility	Responsibility for Oversight of Compliance/ Verification	Agency Coordination	Comments
<p><b>BIO-2: Conduct Pre-Construction Sensitive Amphibians Surveys</b></p> <p>The following shall be conducted prior to initiation of Project construction:</p> <ul style="list-style-type: none"> <li>Conduct pre-construction surveys for foothill yellow-legged frog and red-bellied newt where construction occurs near potential habitat. If either species is observed, consultation with CDFW is required prior to initiation of construction activities. No monofilament plastic mesh or line shall be used for erosion control where habitat for foothill yellow-legged frog is identified, to reduce the risk of entrapment during construction.</li> <li>Silt fencing that will not be disturbed will be installed around suitable habitat for foothill yellow-legged frog and red-bellied newt, and fencing will be inspected daily to ensure no individuals are trapped along the fence.</li> </ul>	<p><b>Action:</b></p> <p>Sensitive Amphibians Surveys, Installation of exclusionary fencing</p> <p><b>Timing:</b></p> <p>Prior to the start of construction</p>	<p>Project Biologist</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DGS/RESD</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>USFWS, CDFW</p>	

**California Conservation Corps, Willits Center**  
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Mitigation Measure	Implementation Actions and Timing	Implementation Responsibility	Responsibility for Oversight of Compliance/ Verification	Agency Coordination	Comments
<p><b>BIO-3: Conduct Pre-Construction Northwestern Pond Turtle Surveys</b></p> <p>The following shall be conducted prior to initiation of Project construction:</p> <ul style="list-style-type: none"> <li>Conduct a pre-construction Northwestern pond turtle survey within 24 hours prior to the initiation of construction activities and retain a qualified biologist to survey immediately prior to ground-disturbing activities in suitable habitat. If Northwestern pond turtle is found, consultation with CDFW is required, as well as the development of a relocation plan for Northwestern pond turtles encountered during construction.</li> </ul>	<p><b>Actions:</b></p> <p>Northwestern Pond Turtle Surveys</p> <p><b>Timing:</b></p> <p>Survey: within 24 hour prior to the initiation of construction activities</p> <p>Notification of Trustee Agency: within 24 hours of Northwestern pond turtle being found</p>	<p>Project Biologist</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DGS/RESD</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>USFWS, CDFW</p>	
<p><b>BIO-4: Conduct Pre-Construction Bird Nesting Surveys</b></p> <p>The following shall be conducted prior to initiation of Project construction:</p> <ul style="list-style-type: none"> <li>Conduct a pre-construction nesting raptor and bird survey of all suitable habitat on and adjacent to the Project Site as described below within 14 days of commencement of construction during the nesting season (February 1 – August 31). Surveys should be conducted within 300 feet of the Project Site for</li> </ul>	<p><b>Actions:</b></p> <p>Nesting Raptor and Bird Surveys</p> <p><b>Timing:</b></p> <p>Should construction occur during nesting season (February 1 – August 31), surveys shall occur within 14 days of commencement of</p>	<p>Project Biologist</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DGS/RESD</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>USFWS, CDFW</p>	

**California Conservation Corps, Willits Center**  
Final Initial Study/Mitigated Negative Declaration

Mitigation Measure	Implementation Actions and Timing	Implementation Responsibility	Responsibility for Oversight of Compliance/ Verification	Agency Coordination	Comments
<p>nesting raptors, including sharp-shinned hawk, and 100 feet of the Project Site for nesting birds.</p> <ul style="list-style-type: none"> <li>A no-disturbance buffer around the nest shall be established if active nests are found. The buffer distance shall be established by a qualified biologist and is recommended to be 300 feet for raptors and 50 feet for non-raptor songbirds. If an active sharp-shinned hawk, yellow-breasted chat, or yellow warbler nest is found, the no-disturbance buffer shall be determined through consultation with CDFW. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest tree, to be determined by a qualified biologist. No further measures are necessary once the young are independent of the nest. Pre-construction nesting surveys are not required for construction activity outside the nesting season.</li> </ul>	construction				
<p><b>BIO-5: Conduct Pre-Construction Sensitive Mammal Surveys</b></p> <p>Implement the following prior to initiation of project construction:</p> <ul style="list-style-type: none"> <li>Conduct a pre-construction American badger survey within 48 hours prior to construction activities. Consultation with CDFW is required prior to initiation of construction activities if American badgers are</li> </ul>	<p><b>Actions:</b></p> <p>Sensitive Mammal Surveys, habitat assessments</p> <p><b>Timing:</b></p> <p>American badger: Within 48 hours prior to construction activities</p>	<p>Project Biologist</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DGS/RES</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	USFWS, CDFW	

**California Conservation Corps, Willits Center**  
Final Initial Study/Mitigated Negative Declaration

Mitigation Measure	Implementation Actions and Timing	Implementation Responsibility	Responsibility for Oversight of Compliance/ Verification	Agency Coordination	Comments
<p>found.</p> <ul style="list-style-type: none"> <li>Conduct a pre-construction survey for Ringtail. Consultation with CDFW is required prior to initiation of construction activities if potential den sites are located that will not be avoided by construction. No further measures are necessary if no potential den sites are found during the survey.</li> <li>Prior to work within potentially suitable bat roosting habitat, a bat habitat assessment is recommended for all suitable roosting habitat (i.e., manmade structures and suitable trees, if present). If the assessment identifies moderate to highly suitable roosting habitat, a qualified biologist will conduct an evening bat emergence survey that may include acoustic monitoring to determine whether or not bats are present. If Townsend's big-eared bats are found, consultation with CDFW is required prior to initiation of construction activities. No further measures are necessary if no suitable roosting habitat is found, or if bats are not found during the emergence surveys.</li> </ul>	<p>Ringtail: Through consultation with CDFW prior to construction activity</p> <p>Bats: Prior to construction activity</p>				



**California Conservation Corps, Willits Center**  
Final Initial Study/Mitigated Negative Declaration

Mitigation Measure	Implementation Actions and Timing	Implementation Responsibility	Responsibility for Oversight of Compliance/ Verification	Agency Coordination	Comments
<p><b>BIO-6: Compensate for the Loss of Riparian Communities</b></p> <ul style="list-style-type: none"> <li>To compensate for the total loss of ±0.006 acre of riparian habitat, prior to construction the Department of General Services (DGS) shall obtain a CDFW Section 1602 Permit and either create riparian habitat or purchase credits at an approved mitigation bank to ensure no net loss of riparian habitat functions and values. If purchasing mitigation credits, a 3:1 ratio will be employed, which would require a total of approximately 0.018 acre of riparian habitat credits from an agency approved mitigation bank. This ratio and acreage will be confirmed during the review of future engineering drawings and may be modified during the CDFW Section 1602 permitting process (if actual increase or decrease), which will dictate the ultimate compensation. The DGS will provide written evidence to the resource agencies that compensation has been established through the purchase of mitigation credits. The amount to be paid will be the fee that is in effect at the time the fee is paid. Alternatively, DGS shall provide a Riparian Habitat Mitigation Plan for CDFW approval that identifies appropriate habitat creation, success criteria and monitoring and reporting requirements consistent with the Project's 1602 Permit conditions.</li> </ul>	<p><b>Actions:</b></p> <p>Compensation for loss of riparian habitat</p> <p><b>Timing:</b></p> <p>Prior to construction</p>	<p>DGS/RESD</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DGS/RESD</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>CDFW</p>	

**California Conservation Corps, Willits Center**  
Final Initial Study/Mitigated Negative Declaration

Mitigation Measure	Implementation Actions and Timing	Implementation Responsibility	Responsibility for Oversight of Compliance/ Verification	Agency Coordination	Comments
<p><b>BIO-7: Compensate for the Permanent Loss of Wetlands/Waters of the United States/Waters of the State.</b></p> <ul style="list-style-type: none"> <li>To compensate for the permanent loss of Waters of the U.S./State, DGS shall obtain Section 404 and 401 Permits from the USACE and RWQCB and either create replacement wetland habitat or purchase credits at an agency-approved mitigation bank to ensure no net loss of wetland functions and values. The wetland compensation ratio will be a minimum of 1:1 (one acre of wetland habitat credit for every one acre of impact) to ensure no net loss of wetland habitat functions and values. The DGS will also implement the conditions and requirements of state and federal permits that will be obtained for the Proposed Project. The actual mitigation ratio and associated credit acreage may be modified based on final design and USACE and RWQCB permitting which will dictate the ultimate compensation for permanent impacts to Waters of the U.S./ State. Alternatively, DGS shall provide a Wetland Habitat Mitigation Plan for USACE and RWQCB approval that identifies appropriate wetland creation, success criteria and monitoring and reporting requirements consistent with the Project's Section 404 and 401 Permit conditions. Furthermore, existing data from a</li> </ul>	<p><b>Actions:</b></p> <p>Compensation for loss of Waters of the U.S./Waters of the State</p> <p><b>Timing:</b></p> <p>Prior to construction</p>	<p>DGS/RESD</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DGS/RESD</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>CDFW</p>	

**California Conservation Corps, Willits Center**  
Final Initial Study/Mitigated Negative Declaration

Mitigation Measure	Implementation Actions and Timing	Implementation Responsibility	Responsibility for Oversight of Compliance/ Verification	Agency Coordination	Comments
previous delineation conducted during the wet season in 2016 will be used to determine the extent of Waters of the State under the pending new State Dredge and Fill Procedures, and to support preparation of the application for a Water Quality Certification and Streambed Alteration Agreement.					
<p><b>CUL-1: Implement Measures to Protect Unanticipated Cultural Resources Discoveries Awareness Training and Monitoring</b></p> <ul style="list-style-type: none"> <li>A qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology shall provide pre-construction cultural resources awareness training to all construction personnel. Training will include appropriate protocol following the unanticipated discovery of any archaeological deposits during construction. A qualified professional archaeologist shall be retained to monitor all ground-disturbing activity associated with the Project.</li> </ul> <p><b>Stop Work for Unanticipated Discoveries and Evaluate the Find</b></p> <p>If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt</p>	<p><b>Actions:</b></p> <p>Implement unanticipated discoveries protocol</p> <p><b>Timing:</b></p> <p>Ongoing and as needed during construction activities</p>	<p>Project Archaeologist, Construction Manager</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DGS/RESD</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>CRHR, County Medical Examiner, NAHC</p>	

**California Conservation Corps, Willits Center**  
Final Initial Study/Mitigated Negative Declaration

Mitigation Measure	Implementation Actions and Timing	Implementation Responsibility	Responsibility for Oversight of Compliance/ Verification	Agency Coordination	Comments
<p>within a 50-foot radius of the discovery. The qualified archaeologist shall be called upon to evaluate the significance of the find and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:</p> <ul style="list-style-type: none"> <li>• If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required.</li> <li>• If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify RESD. RESD shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the CRHR. Work may not resume within the no-work radius until RESD, through consultation as appropriate, determines that the site either: 1) is not eligible for or CRHR; or 2) that the treatment measures have been completed to its satisfaction.</li> <li>• If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (Assembly Bill [AB] 2641). The archaeologist shall notify the Mendocino</li> </ul>					

**California Conservation Corps, Willits Center**  
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Mitigation Measure	Implementation Actions and Timing	Implementation Responsibility	Responsibility for Oversight of Compliance/ Verification	Agency Coordination	Comments
<p>County Medical Examiner (as per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Medical Examiner determines the remains are Native American and not the result of a crime scene, the Medical Examiner will notify the NAHC, who then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If RESD does not agree with the recommendations of the MLD, the NAHC may mediate (§ 5097.94 of the PRC). If no agreement is reached, RESD must reburial the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate information center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until RESD, through consultation as appropriate, determines that the treatment measures have been completed to its satisfaction.</p>					

**California Conservation Corps, Willits Center**  
Final Initial Study/Mitigated Negative Declaration

Mitigation Measure	Implementation Actions and Timing	Implementation Responsibility	Responsibility for Oversight of Compliance/ Verification	Agency Coordination	Comments
<p><b>GEO-1: Discovery of Unknown Paleontological Resources</b></p> <ul style="list-style-type: none"> <li>If any paleontological resources (i.e., fossils) are found during Project construction, construction shall be halted immediately in the subject area and the area shall be isolated using orange or yellow fencing until RESD is notified and the area is cleared for future work. A qualified paleontologist shall be retained to evaluate the find and recommend appropriate treatment of the inadvertently discovered paleontological resources. In addition, in the event of an inadvertent find, sediment samples should be collected and processed to determine the small fossil potential on the Project Site. If RESD resumes work in a location where paleontological remains have been discovered and cleared, RESD will have a paleontologist onsite to observe any continuing excavation to confirm that no additional paleontological resources are in the area. Any fossil materials uncovered during mitigation activities should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.</li> </ul>	<p><b>Actions:</b></p> <p>Implement operator training as described in Mitigation Measure GEO-1.</p> <p>Notify DGS/RESD in the event of a discovery.</p> <p>Suspend work in the area of discovery.</p> <p>Notify Qualified Archaeologist.</p> <p>Implement appropriate treatment of found materials.</p> <p><b>Timing:</b></p> <p>Prior to ground-disturbing activities and ongoing as needed</p>	<p>Project Paleontologist, Equipment Operators</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DGS/RESD</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>		

**California Conservation Corps, Willits Center**  
Final Initial Study/Mitigated Negative Declaration

<b>Mitigation Measure</b>	<b>Implementation Actions and Timing</b>	<b>Implementation Responsibility</b>	<b>Responsibility for Oversight of Compliance/ Verification</b>	<b>Agency Coordination</b>	<b>Comments</b>
<b>TRANS-1: Pay Fair Share for Signal Improvements</b> <ul style="list-style-type: none"> <li>The Project applicant shall pay their fair share toward the installation of a traffic signal at the intersection of Main Street and Baechtel Road.</li> </ul>	<b>Actions:</b> Pay Fair share for signal improvements  <b>Timing:</b> Before Willits Center begins post-construction operations	DGS/RESD, City of Willits  <hr/> Initials  <hr/> Date	DGS/RESD  <hr/> Initials  <hr/> Date		
<b>TCR-1: Implement MM CUL-1</b>	<b>Actions and Timing:</b> Refer to Mitigation Measure CUL-1, above.	Project Archaeologist  <hr/> Initials  <hr/> Date	DGS/RESD  <hr/> Initials  <hr/> Date	CRHR, County Medical Examiner, NAHC	

**California Conservation Corps, Willits Center**  
Final Initial Study/Mitigated Negative Declaration

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To be signed when all mitigation measures have been completed:

Department of General Services

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Signature

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<Lead Agency Contact>

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Printed Name

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Date

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## **SECTION 6.0 LIST OF ATTACHMENTS**

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Attachment A – Notice of Intent

Attachment B – Proof of Publication

Attachment C – Draft Initial Study and Mitigated Negative Declaration for the California  
Conservation Corps, Willits Center

## **ATTACHMENT A**

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Notice of Intent

# NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY

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DATE: January 15, 2020

TO: Responsible Agencies, Interested Parties, and Organizations

SUBJECT: **California Conservation Corps, Willits Center Project — CITY OF WILLITS, MENDOCINO COUNTY**

The California Conservation Corps (CCC) is the California Environmental Quality Act (CEQA) Lead Agency for the proposed CCC Willits Center Project (Proposed Project). CCC has directed the preparation of an Initial Study (IS) Mitigated Negative Declaration (MND) in compliance with CEQA.

**Project Location:** The Proposed Project is located 440 East Hill Road, Willits, CA. The Project Site is located north of East Hill Road between the US Highway 101 bypass on the east and the former Northwestern Pacific Railroad corridor on the west in the City of Willits, Mendocino County, California within Assessor's Parcel Numbers (APNs) 007-160-18 and 007-100-28.

**Project Description:** The California Conservation Corps (CCC) Willits Center (proposed Project or Center) involves development of a new CCC operations center at 440 East Hill Road in the Town of Willits to accommodate relocation of existing operations at the CCC Ukiah Center. The Project consists of a new CCC residential center that includes a total of approximately 64,000 square feet (sf) of new building construction. The Center will include 12 buildings consisting of an administration building, seven dormitories, an education building, a recreation building, a multi-purpose building with kitchen and dining room, a warehouse with work area and a hazardous materials storage room. The site will include asphalt paved surfaces for driveways and parking and concrete paving for service and staging areas and walkways. The Project also includes a paved emergency crew and vehicle staging area and solar photo voltaic array.

The facility is designed based on the prototype and CCC's residential needs to house 100 permanent Corpsmembers. The center is intended to be designed to Zero Net Energy (ZNE) per the Governor's Executive Order (EO) B-18-12 and achieve at minimum a Leadership in Energy and Environmental Design (LEED) Silver certification. Once completed, existing Ukiah Center CCC housing and training functions would be relocated to the Willits facility.

**Potentially Significant Environmental Impacts:** Potentially significant impacts to biological resources, cultural resources, geology and soils, and transportation were identified in the Initial Study. All impacts would be reduced to a less than significant level with the implementation of identified mitigation measures.

**Hazardous Waste Sites:** Pursuant to Section 15087(c)(6) of the Guidelines for California Environmental Quality Act, CCC acknowledges the non-existence of hazardous waste sites within the project area reviewed by this Mitigated Negative Declaration (MND).

**IS/MND Document Review and Availability:** The public review and comment period for the IS/MND will extend for 30 days **starting January 15, 2020 and ending February 14, 2020**. The IS/MND is available for public review at the following locations:

## NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY

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- Department of General Services Real Estate Services Division, 707 Third Street, 4<sup>th</sup> Floor, West Sacramento, CA 95605 (8:00 A.M. to 5:00 P.M., Monday through Friday)
- Willits City Hall, 111 E Commercial St, Willits, CA 95490 (8:00 A.M. to 5:00 P.M., Monday through Friday)

The IS/MND can also be viewed and/or downloaded at the following website:

[www.ecorpconsulting.com/docs/CCC-Willits-Center-Draft-ISMND-WITH-APPENDICES.pdf](http://www.ecorpconsulting.com/docs/CCC-Willits-Center-Draft-ISMND-WITH-APPENDICES.pdf)

**Comments/Questions:** Comments and/or questions regarding the IS/MND may be directed to: Stephanie Coleman, Senior Environmental Planner, State of California Department of General Services, Real Estate Services Division, 707 Third Street, 4<sup>th</sup> Floor, West Sacramento, CA 95605 or [Stephanie.coleman@dgs.ca.gov](mailto:Stephanie.coleman@dgs.ca.gov)

## **ATTACHMENT B**

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Proof of Publication

# The Willits News

77 W Commercial Street  
PO Box 628  
Willits, CA 95490  
707-459-4643

3822658

ECORP CONSULTING, INC.  
2525 WARREN DRIVE  
ROCKLIN, CA 95677

## PROOF OF PUBLICATION

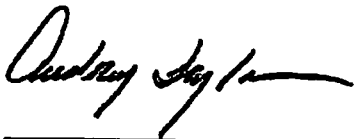
### STATE OF CALIFORNIA COUNTY OF MENDOCINO

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of The Willits News, a newspaper of general circulation, printed and published Every Wednesday and Friday in the City of Willits, California, County of Mendocino, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Mendocino, State of California, in the year 1903, Case Number 9150; that the notice of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

01/15/2020

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Dated at Willits, California this 15th day of January, 2020.



Signature

Legal No. 0006445995

WN20-230  
DATE: January 15, 2020

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1/15/2020



## **ATTACHMENT C**

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Draft Initial Study and Mitigated Negative Declaration for the California Conservation Corps, Willits Center