

WILLITS UNIFIED SCHOOL DISTRICT GENERAL PLAN AMENDMENT AND REZONE

CITY PROJECT FILE# GPA19-01; ZC19-01

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

LEAD AGENCY:

CITY OF WILLITS
COMMUNITY DEVELOPMENT DEPARTMENT
111 EAST COMMERCIAL STREET
WILLITS, CA 95490
CONTACT: DUSTY DULEY, COMMUNITY DEVELOPMENT DIRECTOR

PREPARED BY:



METROPOLITAN PLANNING GROUP
499 HUMBOLDT STREET
SANTA ROSA, CA 95404

JUNE 2020

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**WILLITS UNIFIED SCHOOL DISTRICT GENERAL PLAN AMENDMENT AND REZONE
CEQA ENVIRONMENTAL CHECKLIST AND INITIAL STUDY**

Project Title:	WUSD General Plan Amendment and Rezone
Lead agency name and address:	City of Willits Community Development Department 111 East Commercial Street Willits, CA 95490
Contact person and phone number:	Dusty Duley, Community Development Director (707) 459-7124 Email: dduley@cityofwillits.org
Project Location:	1277 Blosser Lane Willits, Mendocino County, CA 95490 Assessor's Parcel Numbers: 006-210-19; 006-210-26X
File Number:	GPA 19-01; ZC 19-01
Project sponsor's name and address:	Mark Westerburg, Superintendent Willits Unified School District 1277 Blosser Lane Willits, CA 95490 (707) 459-5314 x 1107 Email: markwesterburg@willitsunified.com
Property Owners:	Willits Unified School District
General Plan Designation:	Existing: Industrial-General (M-G) Proposed: Residential Medium Density (R-M)
Zoning:	Existing: Heavy Industrial (MH) Proposed: Residential Medium-Density (R2)
Description of project:	The project proposes a General Plan amendment and rezone of approximately 5.68-acres inclusive of a 3.17-acre, flag shaped lot with frontage on Locust Street (APN 006-210-19) and a 2.51-acre portion of a 5.74-acre lot located at 1277 Blosser Lane (APN 006-210-26). The properties are currently vacant and are designated Industrial General (M-G) under the General Plan and Heavy Industrial (MH) under the Zoning Ordinance. The project proposes to amend the General Plan designation to Residential Medium Density (R-M) and rezone the properties to Residential Medium-Density (R2).
Surrounding land uses and setting; briefly describe the project's surroundings:	The project site is surrounded by residences to the east, Blosser Lane Elementary School to the south, indoor agricultural and commercial storage uses and an active railroad to the north, and lumber operations to the west. Other surrounding uses include Baechtel Grove Middle School, which is located east of the project site on Locust Street.

Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreements):	N/A
Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?	Coyote Valley Band of Pomo Indians, Pinoleville Pomo Nation, and Sherwood Valley Band of Pomo Indians were notified on January 2, 2020 of the proposed project. No responses requesting to consult on the project were received within the statutory timeframe provided by Public Resources Code §21080.3.1

**WILLITS UNIFIED SCHOOL DISTRICT GENERAL PLAN AMENDMENT AND REZONE
CEQA ENVIRONMENTAL CHECKLIST AND INITIAL STUDY**

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- E. TRAFFIC IMPACT STUDY FOR THE SCHOOL PROPERTY REZONING PROJECT, PREPARED BY W-TRANS, MAY 14, 2020.

LIST OF ACRONYMS

ASSEMBLY BILL	AB
BAY AREA AIR QUALITY MANAGEMENT DISTRICT	BAAQMD
BELOW MARKET RATE	BMR
BEST MANAGEMENT PRACTICES	BMP
BRITISH THERMAL UNIT	BTU
CALIFORNIA AIR RESOURCES BOARD	CARB
CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE	CFFW
CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION	CAL FIRE
CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL	DTSC
CALIFORNIA EMISSIONS ESTIMATOR MODEL	CALEEMOD
CALIFORNIA ENDANGERED SPECIES ACT	CESA

CALIFORNIA ENERGY COMMISSION	CEC
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY	ACAL-EPA
CALIFORNIA ENVIRONMENTAL QUALITY ACT	CEQA
CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD	CIWMB
CALIFORNIA NATURAL DIVERSITY DATABASE	CNDDB
CALIFORNIA REGISTER OF HISTORIC RESOURCES	CRHR
CALIFORNIA REGISTER OF HISTORICAL RESOURCE	CRHR
CALIFORNIA SURFACE MINING AND RECLAMATION ACT	SMARMA
CARBON DIOXIDE EQUIVALENT	CO2E
CARBON MONOXIDE	CO
CLEAN WATER ACT	CWA
COMMUNITY NOISE EQUIVALENT LEVEL	CNEL
EMERGENCY VEHICLE ACCESS	EVA
ENDOCINO COUNTY AIR QUALITY MANAGEMENT DISTRICT	MCAQMD
ENVIRONMENTAL IMPACT REPORT	EIR
ENVIRONMENTAL SITE ASSESSMENT	ESA
EXECUTIVE ORDER	EO
FEDERAL EMERGENCY MANAGEMENT AGENCY	FEMA
FEDERAL ENDANGERED SPECIES ACT	FESA
FIRE HAZARD SEVERITY ZONES	FHSZ
FLOOD INSURANCE RATE MAPS	FIRM
GIGAWATT-HOURS	GWH
GREENHOUSE GASES	GHG
INITIAL STUDY	IS
INSTITUTE OF TRANSPORTATION ENGINEERS	ITE
LEAKING UNDERGROUND STORAGE TANK	LUST
LEVEL OF SERVICE	LOS
LOCAL ENFORCEMENT AGENCY	LEA
LOCAL RESPONSIBILITY AREA	LRA
LOW IMPACT DEVELOPMENT	LID
MEGAWATT HOURS	MWH
MENDOCINO COUNCIL OF GOVERNMENTS	MCOG
MENDOCINO TRANSIT AUTHORITY	MTA
METHANE	CH3
METRIC TONS	MT
MIGRATORY BIRD TREATY ACT	MBTA
MILLION GALLONS PER DAY	MGD
MITIGATED NEGATIVE DECLEARATION	MND
MITIGATION MONITORING AND REPORTING PROGRAM	MMRP
NATIONAL POLLUTION DISCHARGE ELIMINATION SYSTEM	NPDES
NATIVE AMERICAN HERITAGE COMMISSION	NAHC
NATURAL COMMUNITY CONSERVATION PLANNING	NCCP
NATURALLY OCCURRING ASBESTOS	NOA

NITROGEN OXIDES	NOX
NORTHWEST INFORMATION CENTER	NWIC
NOTICE OF INTENT	NOI
OFFICE OF PLANNING AND RESEARCH	OPR
PARTICULATE MATTER	PM
PEAK PARTICLE VELOCITY	PPV
POUNDS PER DAY	LBS/DAY
PUBLIC RESOURCES CODE	PRC
REACTIVE ORGANIC GASES	ROG
REGIONAL TRANSPORTATION PLANNING AUTHORITY	RTPA
REGIONAL WATER QUALITY CONTROL BOARD	RWQCB
SANITARY SEWER MANAGEMENT PLAN	SSMP
SENATE BILL	SB
STATE OFFICE OF EMERGENCY SERVICES	OES
STATE RESPONSIBILITY AREA	SRA
STATEWIDE INTEGRATED TRAFFIC RECORDS SYSTEM	SWITRS
STORMWATER POLLUTION PREVENTION PLAN	SWPPP
TOXIC AIR CONTAMINANTS	TAC
TRAFFIC ANALYSIS ZONE	TAZ
TRAFFIC IMPACT STUDY	TIS
TRANSPORTATION DEMAND MANAGEMENT	TDM
TRIBAL CULTURAL RESOURCES	TCR
UNITED STATES DEPARTMENT OF AGRICULTURE	USDA
UNITED STATES FISH AND WILDLIFE SERVICE	USFWS
VEHICLE MILES TRAVELED	VMT
WILDLAND-URBAN INTERFACE	WUI
WILLITS UNIFIED SCHOOL DISTRICT	WUSD

1. INTRODUCTION

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared in full accordance with the procedural and substantive requirements of the California Environmental Quality Act (CEQA). The analysis herein evaluates environmental impacts from the proposed Willits Unified School District General Plan Amendment and Rezone Project, which consists of amending the General Plan Land Use designation and Zoning of a 3.17-acre lot and an approximately 2.51-acre portion of a 5.74-acre lot from industrial to residential (hereinafter referred to as the "Project").

Under CEQA, a project is defined as an activity that may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. Though there is no physical development proposed at this time, it is reasonably foreseeable that the proposed project, an amendment to the existing General Plan Land Use and Zoning designations, would allow for the future development of residential uses onsite, including a residential subdivision for single family homes and opportunities for by-right development under the City Zoning Code such as a conforming multi-family residential development. Future development that would be acceptable under the proposed amendments are limited to residential uses with a maximum density of one dwelling unit per 3,000 square feet, and conditionally permitted non-residential uses with a maximum lot coverage of 50 percent. In addition to the base density permitted by the R2 zoning district, residential developers have the opportunity to utilize state density bonus up to 35 percent, pursuant to applicable regulations contained in Chapter 17.67 of the Willits Municipal Code. Therefore, for the purposes of this analysis, it is presumed that the proposed General Plan Amendment and Rezone Project will result in the future development of a residential use onsite that could potentially support up to 111 units (82 base units, and 29 additional units with a density bonus) which would directly result in physical changes to the existing environment.

1.1. Purpose and Intent

This IS/MND is intended to inform City decision-makers, responsible agencies, interested parties and the general public of the proposed project and its potential environmental effects. This IS/MND provides an analysis of the proposed Project (General Plan Land Use Amendment and Zoning Amendment) as well as the potential environmental impacts anticipated by future residential development on the site. In the future, at the time that the City receives a development proposal for the site, a determination will be made as to whether this environmental analysis adequately evaluates environmental impacts associated with the proposed development of the site or whether an addendum, supplemental, or other CEQA documentation is necessary. This analysis is intended to provide the CEQA-required environmental documentation for all city, local and state approvals or permits that might be required to implement the proposed project, including a future conforming residential application.

CEQA Guidelines Section 15063(c) lists the following purposes of an Initial Study:

1. Provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration.
2. Enable an Applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby possibly enabling the project to qualify for a Negative Declaration.
3. Assist in the preparation of an EIR, if one is required.

4. Facilitate environmental assessment early in the design of a project.
5. Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment.
6. Eliminate unnecessary EIRs.
7. Determine whether a previously prepared EIR could be used with the project.

The City of Willits, as the lead agency, has conducted an Initial Study to determine the level of environmental review necessary for the proposed project. Consistent with Section 15070(b) of the CEQA Guidelines, the Initial Study identified potentially significant effects, but:

1. Revisions in the Project plans or proposal made by or agreed to by the applicant before a proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect would occur; and
2. There is no substantial evidence, in light of the whole record before the agency, that the Project as revised may have a significant effect on the environment.

Therefore, as the lead agency, the City of Willits has determined that a Mitigated Negative Declaration is the appropriate level of environmental review.

1.2. Public Review

In accordance with CEQA and the state CEQA Guidelines, the IS/MND prepared for the WUSD General Plan Amendment and Rezone Project will be circulated for a 30-day public review period and distributed to interested or involved public agencies, organizations, and private individuals for review. In addition, the IS/MND has been made available for general public review by appointment at the following location:

City of Willits
Community Development Department
111 East Commercial Street
Willits, CA 95490
Hours: Monday - Thursday 9:00 am to 11:00 am and 2:00 pm - 5:30 pm

During the public review period, the public will have an opportunity to provide written comments on the information contained within this IS/MND. The City will use the final IS/MND and all comments and correspondence received within the public comment period for all environmental decisions related to the proposed project.

In reviewing the IS/MND and as articulated in Section 15204(a) of the CEQA Guidelines, affected public agencies and interested members of the public should focus on the sufficiency of the document in identifying and analyzing potential impacts on the environment from the proposed project, and ways in which the significant effects of the project are proposed to be avoided or mitigated. Pursuant to Section 15204(b) of the CEQA Guidelines, such public agencies and persons should focus on the proposed finding that the Project will not have a significant effect on the environment. If public agencies or persons believe that the proposed project may have a significant effect, they should:

3. Identify the specific effect;
4. Explain why they believe the effect would occur; and

5. Explain why they believe the effect would be significant.

Finally, per Section 105204(c), reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments.

Comments on the IS/MND should be submitted in writing to:

Dusty Duley, Community Development Director
City of Willits: Community Development Department
111 East Commercial Street
Willits, CA 95490
(707) 459-7124
Email: dduley@cityofwillits.org

2. PROJECT DESCRIPTION

This section provides a characterization of the WUSD General Plan Amendment and Rezone Project including the environmental setting, project location, and required entitlements. As previously stated, though there is no physical development proposed as part of the Project, it is reasonably foreseeable that the Project will facilitate residential development, which will result in direct physical changes to the environment. This section includes a description of the potential direct and indirect physical change that could occur as a result of the Project.

2.1. Environmental Setting

The City of Willits is located in central Mendocino County, approximately 12 miles north of Redwood Valley and 35 miles east of the Pacific Ocean. Regional access is provided by Highway 101, a major north-south freeway which runs along the eastern edge of the City, connecting Willits to California's northern counties and the San Francisco Bay Area region to the south. State Route 20, which runs from the Pacific Ocean to the Sierra Nevada mountain range provides east-west access to the City.

The City lies in an area known as Little Lake Valley at the foot of the coastal mountain range to the west. Existing development patterns within the City are reflective of its original establishment as a sub-regional commercial and industrial area. Rail service in the City includes passenger rail, provided by the California Western Railroad, and more commonly referred to as the Skunk Train. Willits Municipal Airport is a public airport located approximately three miles northwest of the City.

The City encompasses approximately 2.8 square miles and is envisioned in the General Plan as a self-sustaining city that balances jobs and housing in order to minimize environmental impacts associated with development.

The Project site is located in the southwest portion of the City, south of the rail corridor and approximately 0.75 miles west of the Highway 101 corridor (**Figure 1: Regional Location**). This portion of the City is characterized by low density residential development, manufacturing and industrial uses, schools, and limited retail.

The Project site is comprised of an approximately 2.53-acre flag-shaped parcel with frontage on Locust Street APN 006-210-19) and a portion of a 5.68-acre parcel (APN 006-210-26), located north of Blosser Lane Elementary School (**Figure 2: Project Vicinity**). The Project site has not been previously developed but has been periodically disturbed overtime. As is evident through historical imagery, the

site appears to have been subject to periodic mowing/weed abatement and vehicular access across the site likely associated with the installation of an accessway/parking lot and buildings on a portion of the School District parcel not to be rezoned. The site is at an elevation of 1,400 feet above sea level with little to no elevation change. Ruderal/weedy vegetation is located throughout the site. Trees and bushes are present between the project site and the adjacent railroad corridor to the north and the residential development to the south and east. Trees onsite are minimal and sparsely located within interior portions of the lot. Nearby watercourses include Broaddus Creek north of the Project site and Baechtel Creek east of the site. An intermittent stream runs from Baechtel Creek near its intersection with South Main Street, parallel to Walnut Street, and then turns southeast and runs through the easternmost portion of the site along Locust Street.¹

2.2. Project Description

General Plan and Zoning Amendments

The Project proposes to amend the site's current General Plan Land Use Designation from Industrial General (M-G) to Residential Medium Density (R-M) (**Figure 3: General Plan Existing and Proposed**) and Rezone the site from Heavy Industrial (MH) to Residential Medium-Density (R2) (**Figure 4: Zoning Existing and Proposed**). As a result of the proposed General Plan Amendment and Rezoning, currently permitted and conditionally permitted uses under the MH Zoning Designation, including automotive, agricultural, wholesaling, manufacturing, and industrial would no longer be permitted. Uses permitted and conditionally permitted would be as prescribed under the R-M land use designation and R2 zone, which includes residential uses by-right as well as conditionally permitted uses including child day care services, private educational or religious institutions, outdoor sports or recreational facilities, public service facilities, and general agricultural operations.

Conceptual Future Residential Development

Although there is no physical development proposed by the General Plan and Zoning Amendments, the analysis contained herein includes an evaluation of environmental impacts as they relate to a future residential development that would be permitted by-right under the R2 Zoning Designation. To determine the extent of potential environmental impacts, it is assumed that a multi-family residential development at the maximum permitted density, one dwelling unit per 3,000 square feet, would ultimately be facilitated by the proposed project. It is further assumed that other uses listed as permitted under the R2 Zoning Designation would result in similar impacts as the conceptualized multi-family residential development and therefore environmental impacts would be adequately captured by this analysis. As mentioned above, at the time a future development application is received, the City will make a determination as to whether this environmental analysis adequately evaluates environmental impacts associated with the proposed development of the site or whether an addendum, supplemental, or other CEQA analysis is warranted.

Based on the size of the Project site, approximately 5.68 acres, and the maximum density of the R2 Zoning Designation of one dwelling unit per 3,000 square feet, the site could accommodate up to 111 units including 82 base units, and 29 units with a maximum 35 percent state density bonus. In accordance with the R2 lot regulations the maximum ground cover allowed would be approximately

¹ USGS: <https://edits.nationalmap.gov/markup-app>, accessed June 8, 2020

123,710 square feet, subject to compliance with applicable setbacks, and special yard requirements for dwelling groups. As conceptualized, future site access would be provided from Locust Street near its intersection with Walnut Street, where a gravel and dirt driveway currently exist. Project improvements including parking, architectural design, landscaping, lighting, frontage improvements, water supply, wastewater, solid waste, storm drainage infrastructure, and site preparation and construction would be reviewed by applicable City departments and outside agencies as warranted upon submittal of a formal application. For purposes of this analysis, it is assumed that the future application would conform with all municipal code requirements and all regulation established for the R2 zoning designation.

Required Entitlements

The Project requires the following entitlements from the City of Willits, subject to review and approval by the Planning Commission and City Council:

- General Plan Amendment
- Zoning Amendment

Though no entitlements are being sought at this time for the future development of this site, it is assumed that any future development proposal would at a minimum require a Site Plan Review Permit, subject to administrative review and approval by the Planning Director or their designee. Additionally, a future development proposal would be required to apply for a Boundary Line Adjustment, which would ultimately be recorded with the County Recorder, creating one legal lot.

It is assumed that the environmental analysis and mitigation measures set forth herein, as well as uniformly applied development standards are adequate to address potentially significant environmental impacts of future development at the site. However, at the time of formal submittal of a development application, the City will make a determination as to whether this CEQA analysis adequately evaluated environmental impacts associated with future development of the site or whether an addendum, supplemental, or other CEQA documentation is necessary.

California Native American Tribal Consultation

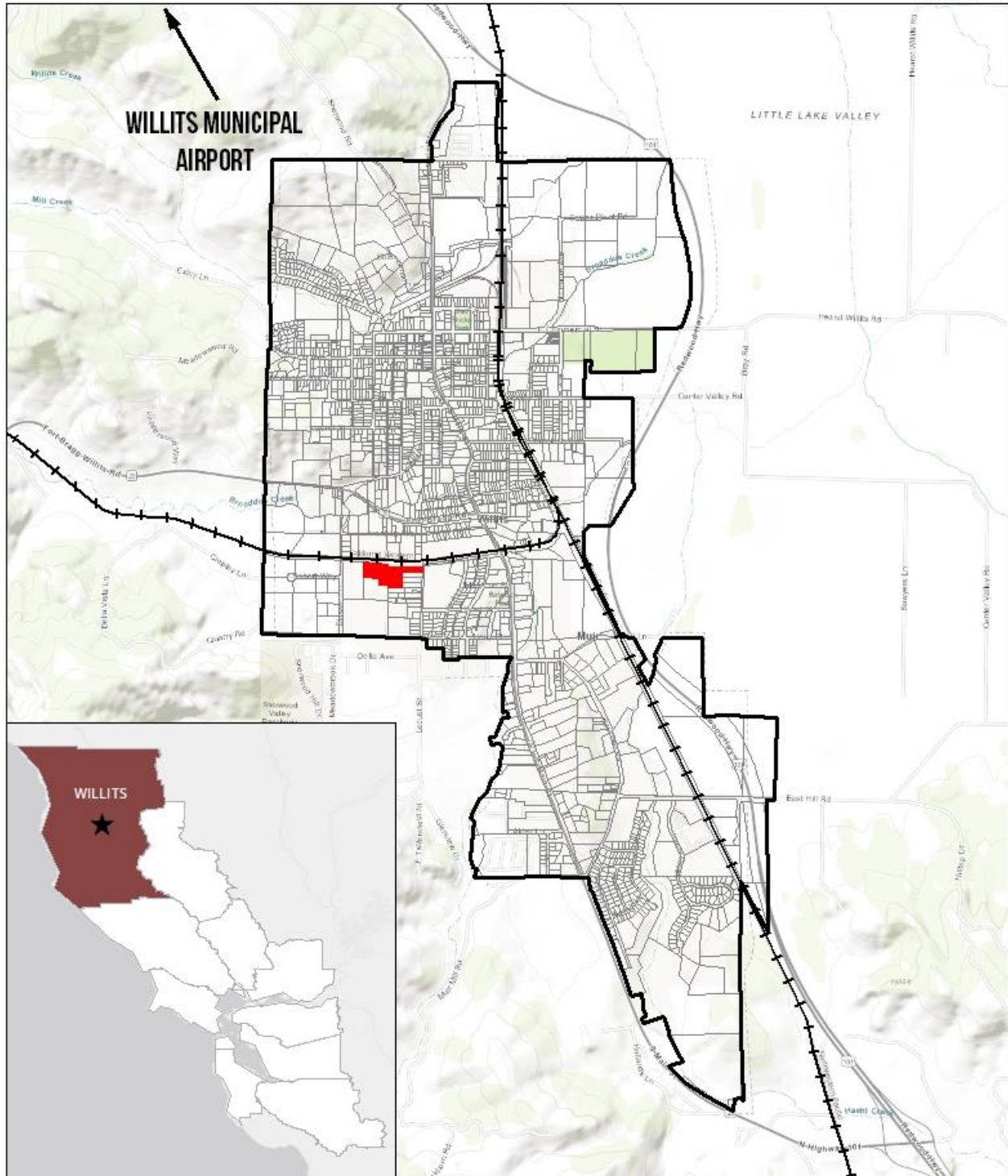
In accordance with AB 52 (PRC Section 21084.2), lead agencies are required to consider Tribal Cultural Resources (TCR) including a site feature, place, cultural landscape, sacred place or object, of cultural value to the tribe and is listed on the California Register of Historic Resources (CRHR) or a local register, or the Lead agency, at its discretion, chooses to treat resources as such. AB 52 mandates that a lead agency initiate consultation with a tribe with traditional and/or cultural affiliations in the geographic area where a subject project is located if a project may cause a substantial adverse change in the significance of a tribal cultural resource. Should the tribe respond requesting formal consultation, the lead agency must work with the tribe or representative thereof to identify potential impacts and develop avoidance or mitigation measures to reduce potential impacts to tribal cultural resources. In addition, SB 18 requires lead agencies to contact, and consult with California Native American tribes prior to amending or adopting any general plan, specific plan, or designating land as open space.

In accordance with AB 52 and SB 18, notification of the proposed project was mailed to the local tribes listed below on January 2, 2020. No responses to the notification or requests to consult on the Project were received.

- Coyote Valley Band of Pomo Indians
- Pinoleville Pomo Nation

- Sherwood Valley Band of Pomo Indians
- Torres Martinez Desert Cahuilla Indians
- Middletown Rancheria of Pomo Indians California

FIGURE 1



W.U.S.D. GENERAL PLAN AMENDMENT AND REZONE: REGIONAL LOCATION

 CITY OF WILLITS
  PROJECT SITE
  MENDOCINO COUNTY

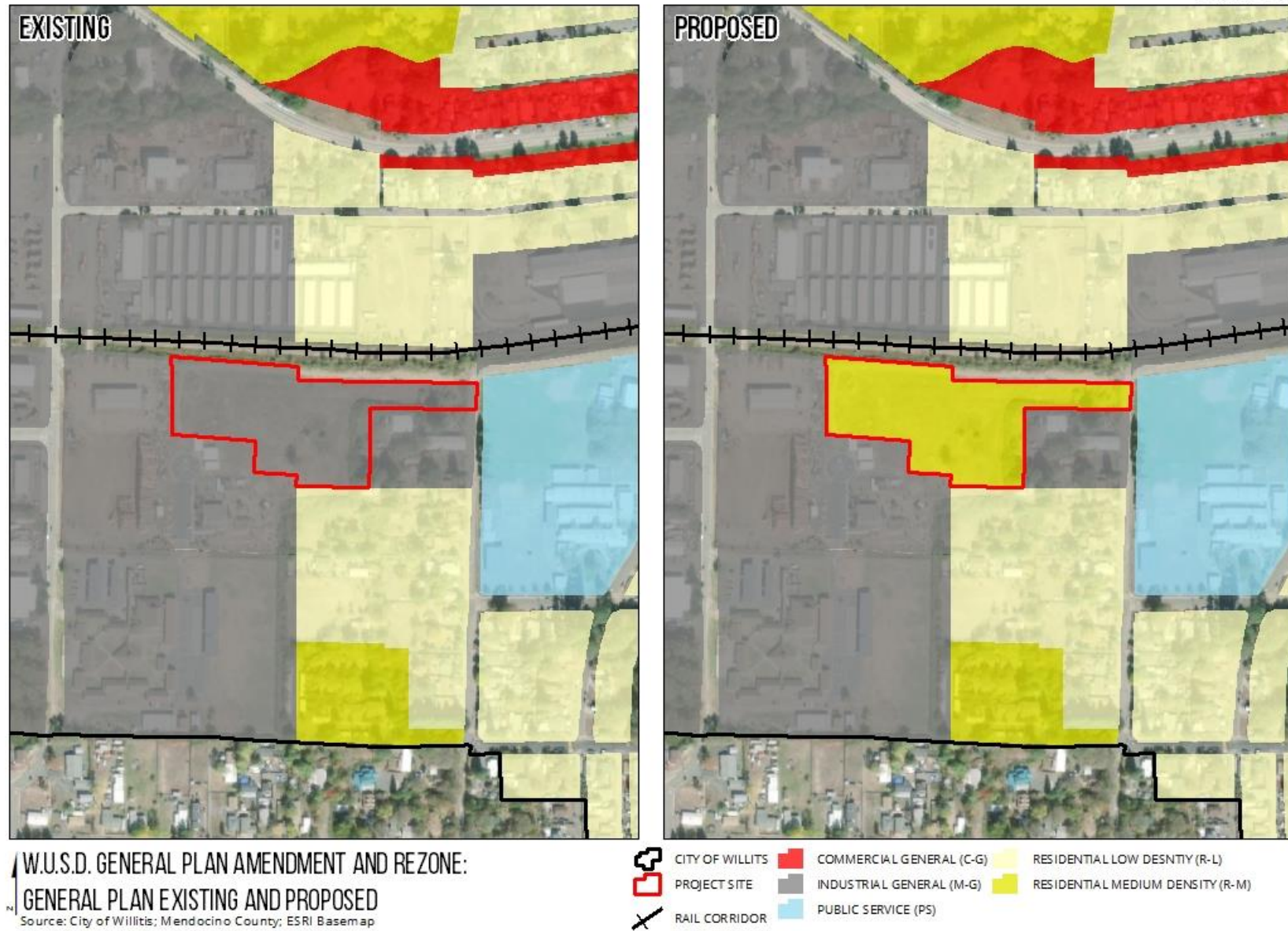
Source: City of Willits; Mendocino County; ESRI Basemap

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FIGURE 2

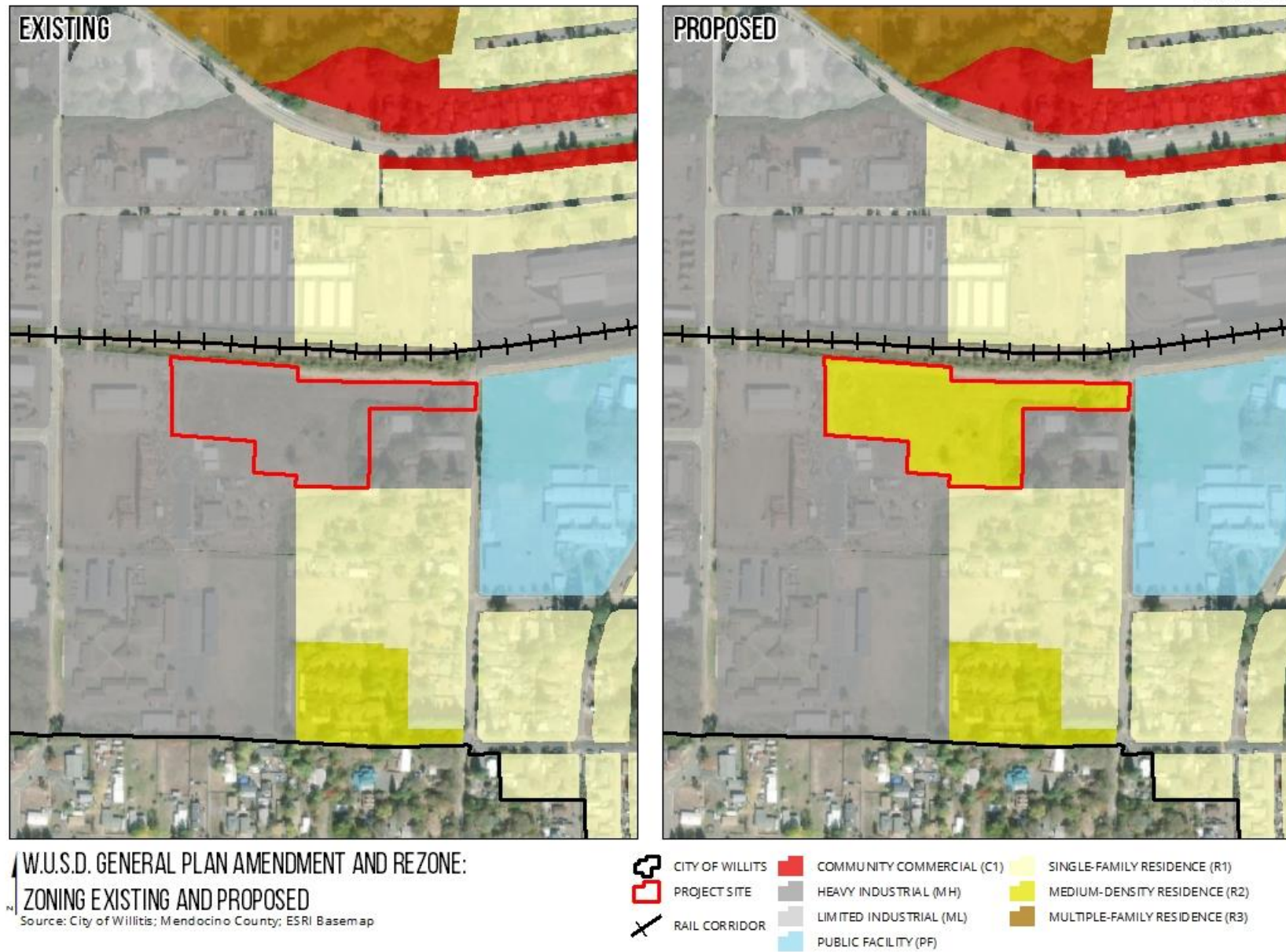
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FIGURE 3



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FIGURE 4



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3. RELEVANT CITY PLANNING DOCUMENTS

This section includes a description of the most relevant planning documents and regulations that are applicable to the proposed project.

3.1. City of Willits General Plan and General Plan EIR

The Vision 2020 City of Willits General Plan Revision was adopted August 12, 1992 and establishes the framework to guide long-term development of the community. Other than the Housing Element, which has been updated in compliance with State law, components of the Vision 2020 General Plan continue to be in effect today (June 2020). Policies, programs, and implementation measures therein shape land use decisions related to housing, open space, circulation, noise, public services, and economic development. As described below, the Housing and Safety Elements have been updated to respond to State law requirements as well as address natural and human-caused hazards in the community.

The City of Willits General Plan EIR analyzes the potential environmental effects of implementing the General Plan, including potentially significant environmental impacts, and measures and policies to mitigate these impacts. Relevant information, including the analysis contained in the General Plan EIR has been incorporated into this IS/MND.

3.2. City of Willits 2019-2027 Housing Element Update

In order to respond to housing needs based on future growth projects, State law requires that the City's Housing Element be updated every eight years. Following adoption of the General Plan, the City's 2009 Housing Element updated policies and programs for the City to meet housing needs including housing supply for lower income households. The City adopted a negative declaration (SCH # 2013022005) prior to approving the 2009 Housing Element. Currently, the City is operating under the 2019-2027 Housing Element, which was approved by the City Council on December 11, 2019 and serves as the City's updated Housing Element. The Housing Element identifies future housing needs within the City of Willits ranging in income from extremely low to above moderate. In total, the City's housing allocation for the 2018-2027 period is 111 residential units.

3.3. City of Willits General Plan 2019 Safety Element Public Review Draft

The City of Willits released the Public Review Draft Safety Element in October 2019, which serves as an update to the original Safety Element of the Vision 2020 Willits General Plan. The Safety Element ensures that goals and policies are relevant and responsive to the needs of the community. The purpose of the updated Safety Element is to understand natural hazard risks within the community, address ways to avoid unnecessary risk, and plan for natural disasters through emergency preparedness.

3.4. City of Willits Bicycle and Pedestrian Specific Plan

The City of Willits Bicycle and Pedestrian Specific Plan was adopted in 2009 (SCH # 2009052035) and serves as a guiding document, providing goals policies and implementation measures that identify ways in which future development can help make Willits a bicycle and pedestrian friendly City. The Plan identifies proposed bikeway improvements in the City ranging from high to low need.

3.5. Willits Safe Routes to School Action Plan

The Willits Safe Routes to School Action Plan, adopted in 2017 intends to build upon other City efforts that improve health through active transportation. Safe Routes to School is specifically intended to create safe, convenient, and fun opportunities for students to walk or bike to and from school. The Action Plan provides recommendations on how to achieve the goals of the Safe Routes to School Program, including specific engineering improvements listed in Appendix G of the Plan.

4. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

The CEQA Initial Study (IS) Checklist and written explanations are provided in Section 6 below. The IS Checklist and narrative indicate the level of significance of the potential environmental effects of the proposed project upon each of the noted environmental resources.

5. DETERMINATION**(TO BE COMPLETED BY THE LEAD AGENCY)**

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment. A NEGATIVE DECLARATION will be prepared.	
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	X
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION , including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	


 Signature: Dusty Duley, Community Development Director

6-30-2020
 Date

6. EVALUATION OF ENVIRONMENTAL IMPACTS

The following discussion addresses the potential level of impact relating to each aspect of the environment.

6.1. Aesthetics

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

Sources: Willits General Plan Vision 2020; General Plan EIR; California Scenic Highway Mapping System, <https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983> accessed June 3, 2020; Willits Municipal Code, Title 17 - Zoning.

Existing Aesthetics Setting

The City of Willits is located in central Mendocino County, approximately 12 miles north of Redwood Valley and 35 miles east of the Pacific Ocean. Regional access is provided by Highway 101, a major north-south freeway which runs along the eastern edge of the City and connects California's northern counties with the greater bay area. Coastal access is provided via State Route 20 which runs from Fort Bragg to the Sierra Nevada mountain range. Rail service in the City includes passenger rail, provided by the Skunk Train which runs from downtown Willits to Fort Bragg. Willits Municipal Airport is a public airport located approximately three miles northwest of the City.

The City of Willits General Plan identifies wooded ridgelines, trains, riparian corridors, and mature trees as attributes which add to the overall aesthetic value of the City. The General Plan also

acknowledges the presence of blight in the City and seeks to enhance the visual character of the City through implementation of General Plan policies including those which encourage projects that would improve the visual characteristic of individual sites and the areas surrounding them, and utilizing the application review process to enhance visual attributes of development projects.

Aesthetics Impact Discussion

6.1(a) (Effect a Scenic Resource or Vista) Less Than Significant Impact As a project that proposes to amend the General Plan Land Use and Zoning designations, no physical development would occur that would impact a scenic resource or vista. Furthermore, impacts of future development have been considered by the General Plan and General Plan EIR, stating that development can serve to enhance the visual environment and where impacts may occur, the development review process may incorporate conditions of approval to reduce any potential impact. The Project site is located on a disturbed site adjacent to residential, industrial, and manufacturing uses. Wooded ridgelines and the train corridor, both of which are identified as visual resources, are visible from the project site. Other than mature trees at the site margins and a few scattered trees onsite, the site lacks scenic resources and is not considered a scenic vista. Removal of existing trees onsite to accommodate future development including residences and access roads would be offset by replacement planting including street trees and landscaping. Future development of the disturbed site would improve the overall visual character of the site by introducing a uniform development pattern with new residences, landscaping, appropriate lighting and associated improvements. Therefore, the Project including the conceptualized future residential development would have a less than significant impact on scenic resources and vistas.

6.1(b) (Scenic Resources from Designated Scenic Highway) No Impact: Within the City, South Main Street from South Street to Muir Mill Road and State Route 20 from South Street to Cropley Lane are identified as eligible for listing as a scenic highway under the State Scenic Highway Program. The Project site lies approximately 0.25 miles west of South Main Street and approximately 750 feet south of State Route 20. As a Project that does not propose physical development, no direct impacts will occur from the proposed General Plan and Zoning Amendments. Furthermore, direct impacts from future development of the site will not damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings viewable from a designated or eligible State scenic highway. The project site lacks rock outcropping and there are no historic buildings onsite. Although some tree removal may be necessary to accommodate future development, replacement planting would be introduced to offset the removal of trees. Importantly, the project site is not visible from nearby eligible scenic highways due to the distance and intervening structures, terrain and vegetation. Therefore, the Project will have no impact due to changes in views of scenic resources from a designated scenic highway.

6.1(c) (Degrade Visual Character or Conflict with Scenic Quality) Less Than Significant Impact with Mitigation: As previously stated, the Project site, though undeveloped, is previously disturbed with ruderal/weedy vegetation and sparse tree cover. The General Plan identifies the need to enhance the overall visual characteristic of the City through thoughtful development that improves individual sites and the areas surrounding them. Though no physical development is proposed by the Project, the change in the permitted types of uses from industrial to residential will provide the opportunity for development of the site that enhances the overall visual quality onsite. Furthermore, **Mitigation Measure AES-1** requires submittal of a detailed landscaping plan which includes native and drought tolerant species which will add to the existing visual character of the surrounding area. Therefore, the

Project will have a less than significant impact to the existing visual character or quality of the site and its surroundings.

6.1(d) (Light and Glare) Less Than Significant Impact with Mitigation: The Project site is in an area that is surrounded by existing development including industrial, institutional and residential uses. Ambient lighting levels are influenced by existing development including interior and exterior lighting, as well as street lighting, and headlights from vehicles. The Project does not propose physical development that would create a new source of light or glare that would adversely affect day or nighttime views. Furthermore, future development of the site will be subject to approval of a Site Plan Review Permit, which requires that lighting be arranged to deflect the light away from adjoining properties. Relative to the existing land use and zoning, which allows for industrial uses, the proposed amendments to allow residential uses are expected to result in lower lighting levels than what otherwise might be introduced. Furthermore, consistent with standard conditions of approval, future development of the site shall implement **Mitigation Measure AES-2**, which requires that all lighting be positioned in a manner that does not produce off-site light and glare. As such, the Project will have less than significant impacts related to light and glare.

Mitigation Measures:

AES-1: Plans submitted for future development of the site shall include a detailed landscaping and fencing plan for review and approval by the Community Development Department. Landscaping shall include the planting and maintenance of a combination of trees, ground cover, shrubs, vines, flowers or lawns. The landscaping plan shall include, to the extent practical, native and/or drought tolerant species which are adapted to the local area, and all appurtenant irrigation systems. In addition, the combination or design may include natural features such as rock and stone, and structural features including but not limited to fountains, reflecting pools, artwork, screens, walls and fences.

All required plantings shall be in place prior to use or occupancy of new buildings or structures and shall be maintained in good growing condition, and whenever necessary, shall be replaced with new plant materials to ensure continued compliance with applicable landscaping, buffering and screening requirements. All landscaping shall be maintained in a manner that will not depreciate adjacent property values or otherwise adversely affect adjacent properties. All landscaping and appurtenant irrigation on private properties shall be maintained by the property owner(s) and/or a homeowner's association. All fencing shall be consistent with Chapter 17.58 of the zoning code

AES-2: Plans submitted for physical development of the site shall include a photometric plan which demonstrates that all external lighting is shielded, downcast, or positioned in a manner that will not result in off-site light and glare on adjacent properties and public-right-of ways.

6.2. Agricultural and Forestry Resources

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

Sources: Willits General Plan Vision 2020; General Plan EIR; and California Department of Conservation Farmland Mapping and Monitoring Program.

Existing Agricultural and Forestry Resources Setting

The California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP) classifies land into Important Farmland Categories, which are based on a combination of technical soil ratings and current land use. Under CEQA, the categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land constitute agricultural land. Based on the most recent available FMMP data, approximately 495 acres are classified as Grazing Land within the City and are primarily located adjacent to the City limits. Other categories within the City include Urban and Built up (1,237 acres), Vacant or Disturbed Land (44 acres), and Rural Residential Land (22 acres). As shown in **Figure A-1 of Appendix A**, the Project site and surrounding area are classified as Urban and Built Up. Land classified as Grazing Land is located approximately 750 feet southeast of the Project site. Agricultural uses are permitted by-right under agricultural and industrial zoning districts and conditionally permitted under some residential zoning districts. There are no Williamson Act properties within the City.

Under Public Resources Code (PRC) section 12220(g), "Forest land" is land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The subject property does not meet

the definition of forest land pursuant to Section 12220(g) of the PRC. According to data obtained by the United States Department of Agriculture (USDA), Forest Service, the Project site does not contain land classified as forest land.² The closest lands classified as productive forest site are located approximately 0.25 miles north and 0.5 miles southeast of the site (**Figure A-2 in Appendix A**).

As stated in PRC section 4526, “Timberland” means land, other than land owned by the federal government and land designated as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.

Under Government Code section 51104(g), “Timberland production zone” or “TPZ” means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, “timberland preserve zone” means “timberland production zone.” None of the land within the project site is in a timberland zone, or within a timberland zoned Timberland Production.

Agricultural and Forestry Resources Impact Discussion

6.2 (a-d) (Farmland, Williamson Act, Forestland, Timberland) No Impact: The project site is not designated under the FMMP as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and therefore will not result in the conversion of farmland to non-agricultural use. Though the existing zoning allows agricultural uses on-site, the site is not currently developed as an agricultural use nor is it designated as a Williamson Act property. The site is designated as Urban or Built-up Land and therefore would not cause rezoning of land designated as forest land or timberland nor would it result in the loss of forest land or conversion of forest land to non-forest use. As such, the proposed Project, and future development facilitated by the Project would have no impact due to conversion of farmland, Williamson Act designation, forestland, or timberland.

6.2 (e) (Other conversions of Farmland or Forestland) Less Than Significant Impact: The subject property is surrounded by land designated as General Industrial, Low and Medium Density Residential, and Public Service on the General Plan Land Use map. None of the area surrounding the project site is under a Williamson Act contract. Additionally, the Project site is surrounded by areas designated as Urban and Built Up under the California Department of Conservation FMMP. Land designated as Grazing Land is located approximately 750 feet southeast of the Project site and is buffered by intervening land designated as Urban and Built Up. As such, the proposed Project, and future development facilitated by the Project, would not act as a catalyst for the conversion of farmland to non-agricultural land and therefore would result in a less than significant impact.

In the absence of forestland on the subject property or surrounding properties, the proposed project would not encourage the loss or conversion of forested land to other uses. Therefore, the project will have no impacts associated with the conversion of forestlands.

Mitigation Measures: None required.

² Land Classifications based on USGS Land Use and Land Cover Classification System for Use with Remote Sensor Data.

6.3. Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: Willits General Plan Vision 2020; General Plan EIR; MCAQMD CEQA Criteria and GHG Pollutant Thresholds Advisory; MCAQMD Adopted Air Quality CEQA Thresholds of Significant, June 2010; MCAQMD Policies for Areas Containing Naturally Occurring Asbestos Advisory; MCAQMD Air Quality Setting for Environmental Document; MCAQMD Particulate Matter Attainment Plan, 2005; Lumber and Sawmill Equipment, Engineering 360, https://www.globalspec.com/learnmore/specialized_industrial_products/wood_processing_products/lumber_saw_mill_equipment, accessed June 22, 2020; Environmental Protection Agency Sawmill Facilities Background Document; and CALCEMod Version 2016.3.2, run date June 22, 2020.

Existing Air Quality Setting

The City of Willits is located within the North Coast Air Basin, which includes the counties of Del Norte, Trinity, Humboldt, Mendocino and parts of Sonoma. Air quality within the North Coast Air Basin is influenced by natural geographical and meteorological conditions as well as human activities such as construction and development, operation of vehicles, industry and manufacturing, and other anthropogenic emission sources. The Federal Clean Air Act and the California Clean Air Act establish national and state ambient air quality standards. The Mendocino County Air Quality Management District (MCAQMD) is the agency responsible for enforcing all State, Federal and Local air quality laws and regulations in Mendocino County, including the City of Willits.

The District is in attainment for all Federal criteria air pollutants, and the majority of all State standards with the exception of PM₁₀. Primary sources of PM₁₀ include wood combustion emissions, fugitive dust from construction, automobile emissions, and industry. The MCAQMD has an adopted Particulate Matter (PM) Attainment Plan which includes recommended control measures to reduce future PM levels including alternatives to the use of wood burning stoves/fireplaces, the use of dust control practices during construction operations, and improvement of bicycle facilities to reduce vehicle trips. In addition to criteria air pollutants, the District also identifies areas likely to contain Naturally

Occurring Asbestos (NOA) and sets forth regulations for evaluating the presence of NOA for individual projects.

Air quality emissions of carbon monoxide (CO), ozone precursors (ROG and NO_x), and particulate matter (PM₁₀ and PM_{2.5}) from construction and operation are evaluated relative to the adopted air quality thresholds as listed in Table 1 below. The MCAQMD utilizes adopted Bay Area Air Quality Management District (BAAQMD) thresholds for construction-related emissions. Operational emission thresholds have been adopted to align with District rules and regulations.

Table 1: Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Indirect Average Daily Emissions (lbs./day)	Stationary Max. Annual Emissions (tons/year)
ROG	54 (BAAQMD)	180	40
NOx	54 (BAAQMD)	42	40
PM ₁₀ (Exhaust)	82 (BAAQMD)	82	15
PM _{2.5} (Exhaust)	54 (BAAQMD)	54	10
Fugitive Dust - PM ₁₀ / PM _{2.5}	Construction Dust Ordinance or other Best Management Practices	Same as above	Same as above
Local CO	Not Applicable	125 tons/year	
Health Risks and Hazards (new source and receptor)	Single Sources Within 1,000-foot Zone of Influence	Combined Sources (Cumulative from all sources within 1,000-foot zone of influence)	
Increased Cancer Risk	>10 per one million	>100 per one million	
Hazard Index	>1.0	>10.0	
Ambient PM _{2.5} increase	>3.0 µg/m ³ annual avg	>0.8 µg/m ³	
Greenhouse Gas Emissions			
Projects other than Stationary Sources		1,100 metric tons annually or 4.6 metric tons per capita (for year 2020)	
Stationary Sources			

Source: MCAQMD's Adopted Air Quality CEQA Thresholds of Significance - June 2, 2010

Note: ROG = reactive organic gases, NO_x = nitrogen oxides, PM₁₀ = coarse particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, PM_{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less; and GHG = greenhouse gases.

The City of Willits General Plan sets forth policies to maintain and improve air quality in the City. Policy 3.280 requires compliance with local and regional air quality policies, and Policy 3.290 promotes alternatives to automobile use as a method of improving air quality.

Air Quality Impact Discussion

6.3(a) (Conflict with Applicable Air Quality Plan) Less Than Significant Impact with Mitigation:

As previously stated, the MCAQMD is in attainment for all Federal and State criteria air pollutants with the exception of PM₁₀. The District adopted the Particulate Matter Attainment Plan in January 2005, which includes recommended control measures for PM. Particularly relevant to future residential development of the site is the restriction of woodburning stoves. District Regulation 4.1-400 prohibits the installation of wood burning fireplaces, outdoor boilers, and other wood burning appliances in new residential developments. Additionally, the Plan includes measures to control particulate matter emissions associated with vehicular activities and wind-generated particulate emissions on unpaved roads. **Mitigation Measures AQ-1** and **AQ-2**, consistent with standard conditions of approval, require that future development of the site comply with applicable MCAQMD regulations including the incorporation of dust control measures during construction and the prohibition of woodburning appliances in new residential developments. Therefore, the Project, and future development facilitated by the Project, will have less than significant impacts due to a conflict with the regional air quality plan.

The majority of the City of Willits, including the Project Site, is located within an area that may contain Naturally Occurring Asbestos (NOA). For projects located in areas identified as containing NOA, the District requires an evaluation and report by a State registered geologist to determine levels of NOA. **Mitigation Measures AQ-3** requires that a future development proposal for the site provide written verification from the MCAQMD stating that the project complies with State and local regulations related to naturally occurring asbestos. As such, the Project, and future development facilitated by the Project, will have a less than significant impact due to a conflict with regulations related to NOA.

6.3(b) (Violate Air Quality Emission Standards) Less Than Significant Impact with Mitigation: Air quality emissions associated with future development of the site would result from short-term construction activities and ongoing operation. The California Emissions Estimator Model (CalEEMod) is the Mendocino County Air Quality Management District's recommended modeling tool for estimating criteria air pollutant emissions associated with construction and operation of a variety of land use projects. Though there is no proposed physical development at this time, the CalEEMod Version 2016.3.2 was used to estimate emissions from construction and operation of a 111 multi-family development, which would be facilitated by the General Plan Amendment and Rezone Project (**Appendix B**). Within the model, Mendocino County is broken into four distinct subdivisions which is intended to more accurately model air quality impacts within inland, coastal, rural inland (north), and rural inland (south) areas of the County. The City of Willits is located within the inland subdivision of the County. A summary of the emissions analysis during construction and at operation for a conceptualized multi-family development is presented below.

Construction

Short-term construction emissions associated with site preparation, grading, building construction, paving, and architectural coating result from operation of on- and off-road construction equipment, fugitive dust from windblown sources and vehicle travel, and painting, striping, and paving of circulation areas. Due to the nature of the soils and the long dry summers, the MCAQMD identifies dust emissions as a major concern in the City of Willits. One primary source of fugitive dust emissions results from construction activities associated with land use projects.

The California Emissions Estimator Model Version 2016.3.2 was used to estimate emissions from construction activities associated with future development of the site as a 110 multi-family residential development. Emission levels were compared relative to MCAQMD significance thresholds as

identified in the table below to determine the project's potential to impact air quality. By default, CALFEEMod assumes a percentage of paved and unpaved roads, which is specified by individual air quality management districts. However, default values may be modified as appropriate. The default value for paved roads in inland Mendocino County assumes 80 percent. However, given the sites location within an urbanized area of the City of Willits it is assumed that 100 percent of trips associated with construction activities, including workers traveling to and from the site, hauling trips, and vendor trips, would be on paved roads. All other CALFEEMod defaults including construction activities, equipment usage, and total project construction workdays were used to estimate construction emissions associated with future development of the site. Average daily construction emissions were calculated by dividing the total construction emissions by total construction workdays. As presented in Table 2 below ROG, NOx, PM₁₀, and PM_{2.5} emissions generated during construction would not exceed MCAQMD significance thresholds. Furthermore, Mitigation Measure AQ-1, requires that future construction activities comply with MCAQMD Regulation 1, Rule 1-430 which will reduce the amount of fugitive dust generated by construction activities. As such, future development of the site would have a less than significant impact to air quality during construction.

Table 2: Construction Period Emissions

	ROG	NOx	PM₁₀	PM_{2.5}
Total Construction Emissions (tons)	2.09	2.81	0.38	0.24
Average Daily Emissions (lbs/day)*	13.97	18.72	2.54	1.58
<i>MCAQMD Thresholds (lbs/day)</i>	<i>54</i>	<i>54</i>	<i>82</i>	<i>54</i>
Exceeds Threshold?	NO	NO	NO	NO

Source: MCAQMD's Adopted Air Quality CEQA Thresholds of Significance - June 2, 2010; CALFEEMod Version 2016.3.2, run date 6/22/2020

*Assumes 300 construction workdays

Operation

A future residential development on the site would result in both stationary and mobile sources of emissions at operation. Although there would be no new stationary "point sources" created (large emitters such as manufacturing plants), the project will result in area source emissions from the use of natural gas, consumer products such as solvents, cleaners, and paints, and landscaping maintenance equipment. A majority of the operational emissions would result from vehicles traveling to and from the project site by residents, visitors, delivery vehicles, etc.

Operation of a future residential development is not expected to result in substantial air quality emissions. Lighting, electricity, water, and wastewater energy related demands would be expected to be minimal as new buildings are subject to Title 24 requirements under the latest building code. Furthermore, the existing General Plan Land Use and zoning designation allows for stationary source emitters including heavy industrial operations that would potentially result in more significant air quality emissions at operation compared to the proposed land use and zoning amendments.

As shown in Table 3 below, operational air quality emissions associated with a future multi-family development, which would be a permitted use as a result of the proposed General Plan Amendment and Rezone at the site would not exceed thresholds set forth by the MCAQMD for ROG, NOx, PM₁₀, and PM_{2.5}. In addition to the air quality emissions listed in the table below, the MCAQMD also sets a threshold of 125 tons/year for CO emissions. The project is anticipated to generate 13.10 tons/year of

CO and therefore does not exceed thresholds set forth by the MCAQMD. As such, a future residential development at the site, which would be facilitated by the Project will have a less than significant impact to air quality at operation.

Table 3: Multi-Family Operational Emissions

Scenario	ROG	NOx	PM₁₀	PM_{2.5}
Total Operational Emissions (tons)	1.71	2.09	1.79	1.29
Average Daily Emissions (lbs/day)*	9.35	11.46	9.83	7.07
<i>MCAQMD Thresholds (lbs/day)</i>	<i>180</i>	<i>42</i>	<i>82</i>	<i>54</i>
Exceeds Threshold?	NO	NO	NO	NO

Source: MCAQMD's Adopted Air Quality CEQA Thresholds of Significance - June 2, 2010; CalEEMod Version 2016.3.2, run date 6/22/2020

*Assumes 365 operational days

6.3(c) (Expose sensitive receptors to substantial pollutant concentrations) Less Than Significant with Mitigation: The California Air Resources Board (CARB) defines sensitive receptors as children, elderly, individuals with asthma, and other populations who are at a heightened risk of negative health effects resulting from exposure to air pollutants. Sensitive receptor locations may include hospitals, schools, day care centers, residential areas and recreation facilities. Sensitive receptors within close proximity of the Project site which may be exposed to health risks from construction exhaust emissions and dust include Blosser Lane Elementary School, Baechtel Grove Middle School, and existing residences.

Construction

Construction associated with future development of the site would result in the emission of exhaust from vehicles and heavy duty equipment as well as the generation of fugitive dust from grading and ground disturbing activities. To ensure that fugitive dust emissions are reduced to levels below significance, Mitigation Measure AQ-1 shall be implemented. Due to the close proximity of multiple sensitive receptors to the site, future construction of the site shall also implement **Mitigation Measure AQ-4**, which requires additional construction mitigation when activities occur within 100 feet of nearby sensitive receptors. With implementation of AQ-1, and AQ-4 potential impacts to sensitive receptors during construction will be reduced to less than significant.

Operation

At operation, a residential development, which is assumed to be a reasonably foreseeable future use at the site facilitated by the proposed General Plan Amendment and Rezone, will not generate air quality emissions that affect sensitive receptors in the vicinity of the site. Potential impacts to sensitive receptors at operation of the project will be less than significant, as residential projects do not generate air quality emissions that would result in health impacts.

Air Quality Land Use Compatibility

The proposed Project, which will amend the allowed uses on site, has the potential to expose new residents onsite to Toxic Air Contaminants (TACs) consisting of fine particulate matter from mobile sources (i.e., vehicles) and stationary source emitters in the vicinity. Emissions associated with the adjacent lumber mill include both mobile and stationary emitters including the operation of heavy duty vehicles used to transport pre- and post-processed wood to and from the site, as well as

processing equipment such as sorters, conveyers, debarkers, saws, chippers, and kilns. Criteria pollutants of concern associated with lumber mill operations primarily include particulate matter from sawing, planing, and vehicles driving on unpaved surfaces, volatile organic compounds (VOC) from drying, and nitrogen oxides (NOx) from boilers.³ Additionally, new residents would potentially be exposed to emissions associated with operation of the Skunk Train on the rail line located north of the Project site. As a tourist operation, the train does not operate on a fixed daily schedule with trips to and from the station operating seven days per week, with a maximum of two tours per day.⁴ Exposure of new residents introduced by the project to air quality emissions from existing sources is not considered an environmental impact of the project but is recognized as a potential land use conflict.⁵

As described above, sources of TACs within 1,000 feet of the project site include adjacent industrial operations located immediately west of the project site boundary and operation of the Skunk Train to the north. As prescribed in Mitigation Measure LU-1 in section 6.11 of this analysis, future development of the site will be required to provide a minimum of a 100-foot buffer from adjacent industrial operations to avoid potential land use compatibility conflicts. Alternatively, LU-1 allows for design alternatives, such as the installation of MERV-13 filters and landscape buffers which may also reduce air quality impacts associated with adjacent sources of TAC's. Therefore, the proposed project would not result in a potential land use compatibility conflict due to introducing sensitive receptors to an area with potentially elevated pollutant concentrations.

6.3(d) (Other Emissions) Less Than Significant Impact: Occasional localized odors during future site development associated with construction equipment, paving and the application of architectural coatings may occur during development of a future residential project permitted under the proposed General Plan amendment and rezone. Any odors generated during construction would be temporary and not likely noticeable beyond the immediate construction zone. As a potential future residential development, operation of the project will not create objectionable odors affecting a substantial number of people. Therefore, the project will have less than significant impacts to air quality due to objectionable odors.

Mitigation Measures:

AQ-1: Future development of the site shall comply with the following mitigation measures set forth by the Mendocino County Air Quality Management District to control for fugitive dust generated during construction activities:

1. All visibly dry disturbed soil and road surfaces shall be watered to minimize fugitive dust emissions.
2. All unpaved areas shall have a posted speed limit of 10 mph.
3. Earth or other material tracked onto neighboring paved roads shall be removed promptly.

³ Background Document: General Air Quality Permit for New or Modified Minor Source Sawmill Facilities in Indian Country, accessed June 22, 2020.

⁴ Skunktrain.com, calendar of availability, access June 22, 2020.

⁵ Per the California Building Industry Association v. the BAAQMD (2015), lead agencies are not required to analyze the impact of existing ambient air quality conditions on new residents.

4. Approved chemical soil stabilizers shall be applied to exposed earth surfaces in inactive construction areas and exposed stock piles (i.e. sand, gravel, dirt).
5. Dust generating activities shall be limited during periods of high winds (over 15 mph).
6. Access of unauthorized vehicles onto the construction site during non-working hours shall be prevented.
7. A daily log shall be kept of fugitive dust control activities.

AQ-2: Future development of the site shall comply with Regulation 4, Rule 4.1-400 of the MCAQMD related to prohibitions on woodburning, including the following:

1. 4.1-400(a) No person shall install an open wood burning fireplace in any new residential, commercial or public building or accessory building, or as part of a renovation of any residential, commercial or public building or accessory building.
2. 4.1-400(b) No person shall install a wood-fired outdoor boiler to provide heat for any residential, commercial or public building or accessory building.
3. 4.1-400(c) No person shall install wood burning appliances in any new, remodeled or renovated multi- family residence, commercial or public building or accessory building, except as a replacement for an existing wood burning appliance.
4. 4.1-400(d) No person shall install wood burning appliances in any new or remodeled residential dwelling of three units or less, or any accessory building, that is not an approved device as defined in Rule 4.1-140(a3).⁶
5. 4.1-400(f) No person shall install any wood burning appliances in any residential dwelling or accessory building that is included as part of a major subdivision, which filed a tentative map after the effective date of this regulation.

AQ-3: Prior to submittal of a formal development application, the applicant shall contact the Mendocino County Air Quality Management District to determine whether an Asbestos Dust Mitigation Plan and/or Geological Survey is required to comply with CCR Section 93105 and 93106 relating to naturally occurring asbestos. Upon formal submittal, written verification from the MCAQMD shall be submitted to the Community Development Department stating that the project complies with State and local regulations related to naturally occurring asbestos

AQ-4: The Applicant and contractor(s) shall implement additional construction mitigation measures when activities occur within 100 feet of nearby sensitive receptors, including the following:

1. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.

⁶ 4.1-140(a3) Approved Appliances: Appliances that are approved by the District for use as wood burning appliances include; (1) Pellet-fueled wood heaters, (2) EPA certified wood heaters, (3) EPA certified fireplace inserts, (4) Devices approved by a California air pollution control agency under a program designed to reduce emissions from residential heating devices

2. Minimize the idling time of diesel powered construction equipment to two minutes.
3. All construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM.
4. Require all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.

6.4. Biological Resources

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

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

☐☐☐☒

Sources: Willits General Plan Vision 2020; General Plan EIR; California Department of Fish and Wildlife, CNDDDB, 2009; referral correspondence with the CDFW; United States Fish and Wildlife Service, Critical Habitat; National Wetland Inventory, accessed June 23, 2020; Biogeographic Information and Observation System (BIOS), accessed June 23, 2020.

Existing Biological Resources Setting

Biological resources are protected by statute including the Federal Endangered Species Act (FESA), the California Endangered Species Act (CESA), and the Clean Water Act (CWA). The Migratory Bird Treaty Act (MBTA) affords protection to migratory bird species including birds of prey. These regulations provide the legal protection for identified plant and animal species of concern and their habitat. The California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) provides an inventory of the status and location of rare plant and animal species in California. Within the City of Willits, the CDFW identifies two species of concern including North Coast semaphore grass (*Pleuropogon hooverianus*), which is listed as threatened, and Baker's meadowfoam (*Limnathes bakeri*), which is listed as rare. Key biological habitats identified in the General Plan include valley oak woodland, coastal prairie grassland, mixed evergreen forest, and riparian woodland.

The Mendocino County General Plan EIR expands on the types of sensitive resources that may be found in and around the City of Willits including Baker's navarretia, glandular western flax, Nuttall's pondweed, narrow-leaved water plantain, red tree vole, northwestern pond turtle, foothill yellow-legged frog, yellowbreasted chat, yellow warbler, serpentine soils, rock outcrops, wetlands, streams, and habitats for raptors and fish.⁷

The United States Fish and Wildlife Service (USFWS) identifies geographic areas that contain features essential for the conservation of threatened or endangered species. A search of the USFWS critical habitat map indicates there are no areas identified as critical habitat for threatened or endangered species within the City of Willits.⁸

The project was referred to the CDFW for early consultation, and it was determined that due to repeated disturbance of the site overtime, there was little concerns with regard to the presence of rare plants and sensitive natural communities on the site. A review of historical imagery confirms that the site has been subject to periodic mowing and other disturbance overtime. The site is relatively flat, lacks tree canopy cover, and has little to no vegetation onsite aside from ruderal/weedy grasses. The CDFW identified an intermittent stream that runs from Baechtel Creek, along Walnut Street, and through the northeast portion of the Project site. The intermittent stream intersects the northeastern most portion of the project site, proximate to Locust Street and Walnut Street. The stream continues

⁷ County of Mendocino General Plan Update Draft Environmental Impact Report, 2008, Chapter 4.4 Biological Resources, Page 4.4-21.

⁸ USFWS, Critical Habitat, accessed June 23, 2020 (**Appendix C**).

south, roughly parallel to Locust street and east of the project site through the rear of existing residential lots. CDFW suggested protective measures for this stream as further discussed below.

Biological Resources Impact Discussion

6.4(a-b) (Adverse Effects to Sensitive Species and Habitats) Less Than Significant Impact with Mitigation: Certain vegetation communities and plant and animal species are designated as having special-status based on their overall rarity, endangerment, restricted distribution, and/or unique habitat requirements. In general, special-status is a combination of these factors that leads to the designation of a species as sensitive. The FESA outlines the procedures whereby species are listed as endangered or threatened and establishes a program for the conservation of such species and the habitats in which they occur. The CESA amends the California Fish and Game (Wildlife) Code to protect species deemed locally endangered and expands the number of species protected under the FESA.

Special-status Vegetation Communities and Plant Species

With the exception of the intermittent stream onsite, which has been identified by the CDFW and as identified in the USFWS National Wetland Inventory⁹, the site is highly disturbed and does not support native habitats for plants or wildlife. Future development of the project site would not directly impact federally or state listed species or their habitats, nor would it impact special-status plant species of any ranking including California Native Plant Society ranked species or CEQA-protected species. As shown in **Appendix C**, the City of Willits is not identified as an area containing essential terrestrial connectivity or essential habitat connectivity.¹⁰

The Project was referred to the CDFW who recommended buffering, application of Low Impact Development (LID) standards, and native planting along the intermittent stream that runs through the northeast portion of the site. LID features are required as part the development review process and any future residential development application proposed for the project site will be required to demonstrate compliance with LID standards including pre-treatment of runoff.

Site access for a future residential development is planned to be taken at the northeastern most portion of the site and would intersect with the intermittent stream. At this location the intermittent stream is highly disturbed, with an existing compact gravel road providing access to the project site. On either side of the existing access point, adjacent to the intermittent stream is low lying vegetation with limited tree canopy. A future residential development has the potential to result in direct and indirect impacts to the intermittent stream during construction and at operation. In order to ensure that potential impacts to the intermittent stream are reduced to less than significant levels, mitigation measure BIO-1 shall be implemented.

Mitigation Measure BIO-1 requires that a future development proposal for the site include design considerations to minimize impacts to the intermittent stream and in the event that disturbance to jurisdictional features would occur, secure approval from regulatory agencies such as the Regional Water Quality Control Board for a 401 permit and the CDFW for a lake and streambed alteration agreement, if warranted. Design considerations may include an open bottom culvert, reduced roadway width at the stream crossing, enhanced native planting along the stream, shade trees along

⁹ USFWS, National Wetland Inventory, accessed June 23, 2020 (**Appendix C**)

¹⁰ CDFW, BIOS viewer, accessed June 23, 2020 (**Appendix C**).

the new roadway, bioswales, and other protective features. With implementation of measure BIO-1, future development of the site would have a less than significant impact to special-status vegetation communities associated with the intermittent stream.

Special-status Animal Species

BIOS 5 was used to determine the presence of special-status animal species in or around the Project site. According to BIOS 5 There are no know occurrences of special-status animal species on the Project site or within the vicinity of the Project site. Therefore, the Project, and future development of the site facilitated by the Project will have no impact to special-status animal species.

6.4(c) (Adverse Effects to Jurisdictional Waters) Less Than Significant Impact with Mitigation:

The Project site is relatively flat and has been periodically disturbed over time. Ruderal/weedy vegetation is located throughout the site and an intermittent stream runs through the northeast corner of the Project site. Other than the intermittent stream the project site does not contain any indicators of jurisdictional waters. As described above, depending on the ultimate design of the access road a future residential development could result in impacts to the intermittent stream, which could result in adverse effects to jurisdictional waters. As required by BIO-1, future development of the site will be required to provide adequate buffering of this intermittent stream and secure regulatory permits if required and implement provisions therein. Therefore, the project will have a less than significant impact to protected wetlands including those defined by Sections 401 and 404 of the Clean Water Act.

6.4(d) (Adverse Effect on Wildlife Movement) No Impact: There is no evidence of migratory wildlife corridors or nurseries onsite or in the project vicinity. The project site highly disturbed area making it relatively inaccessible to many species and eliminates the possibility of the site functioning as a movement corridor. In addition, the project site is surrounded on all sides by existing development. Therefore, the project, including future residential development will have no impacts on wildlife corridors and species movements.

6.4(e) (Conflict with Local Ordinances) No Impact: The Project site does not include any trees designated as protected under the City of Willits Municipal Code. The Project, and future development of the site will not conflict with local ordinances or policies and therefore will have no impact under this category.

6.4(f) (Conflicts with Habitat Conservation Plans) No Impact: Mendocino County does not have any California Regional Conservation Plans, as identified in the California Department of Fish and Wildlife's (CDFW) Natural Community Conservation Planning (NCCP) Map.¹¹ Additionally, there are no other regional or locally adopted conservation plans applicable to the City. Therefore, no impacts resulting from a conflict with an adopted conservation plan will occur from the Project or from future development facilitated by the Project.

Mitigation Measures:

BIO-1: Submittal of a future development proposal for the site shall include detailed design of the access road adjacent to Walnut Street and Locust Street and shall demonstrate avoidance of

¹¹ California Regional Conservation Plans, prepared by California Department of Fish and Wildlife, October, 2017, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, Accessed June 16, 2020.

disturbance to the intermittent stream as feasible. Design consideration shall include a minimum 10 foot buffer or as otherwise determined by the CDFW, LID features, and native plantings. The following consideration shall also be given to a future development project depending on the ultimate design:

- Construction activities should occur outside of the rainy season during periods of dry weather to minimize runoff and erosions and temporary impacts during flow conditions of the intermittent stream.
- To avoid fuels, lubricants, soils and other pollutants from entering the intermittent stream, wildlife friendly hay wattles and/or silt fencing shall be installed. The use of mulch or any other substitute that may enter the stream shall be prohibited.
- Staging, operation and maintenance of heavy-duty construction equipment shall be located away from the intermittent stream and associated vegetation.
- Should construction occur adjacent to the intermittent stream, temporary wildlife exclusion fencing shall be installed between the intermittent stream and construction activities to prevent wildlife from entering work areas. As soon as construction activities adjacent to the intermittent stream is complete, all wildlife exclusion fencing shall be removed.
- Disturbed areas shall be revegetated with native riparian plant species.
- Non-native and invasive ornamental landscaping shall be precluded proximate to the intermittent stream.
- New lighting introduced shall be downcast and precluded from overspill to the riparian corridor.
- In the event that impact to a jurisdictional feature cannot be avoided, the applicant shall obtain permits and approval from the Regional Water Quality Control Board, the Army Corp of Engineers, and the California Department of Fish and Wildlife (if warranted) and shall implement all requirements set forth therein.

6.5. Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

c) Disturb any human remains, including those interred outside of formal cemeteries?

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Sources: Vision 2020 Willits General Plan Revision; General Plan EIR; and Archaeological Survey Report, prepared by Alta Archaeological Consulting, January 15, 2019.

Existing Cultural Resources Setting

Historic resources within the City that are listed either at the state or federal level include the Skunk Train Depot, Willits Carnegie Library, and Irvine & Muir Company, all of which lie in or near downtown Willits. Currently, the City has not identified any locally significant historic resources.

Many of the archaeological resources in the northern Coast Ranges date to the Middle and Upper Archaic Period (8000-1500 BP) and are associated with the movement into new areas to utilize a more diverse range of resources. Around 500 B.C. mobility decreased as inhabitants began establishing small permanent villages and more complex society's and economies. At the time of European contact, the Northern Pomo occupied the area known as Central Mendocino County from the coast to Clear Lake, including the City of Willits. The Mitom poma were the specific group of Pomoan people known to inhabit Little Lake Valley, having established two village sites southwest of the City of Willits. Perennial water courses and the base of the coastal mountain range are identified as areas likely to contain prehistoric and archaeological resources within the City.

An Archaeological Survey Report was prepared for the Project by Alta Archaeological Consulting to identify the presence of any historical, archaeological, or cultural resources within the Project Area (**Appendix D**). In order to identify any potential resources, Alta conducted a records search, historic map and ethnographic literature review, and field survey by a qualified archaeologist.

A records search was conducted at the Northwest Information Center (NWIC) on December 19, 2019 (File No. 19-1033) to identify historical and archaeological resources within one-half mile of the Project Area. Results of the search did not indicate the presence of historical landmarks, points of interest, or properties that are listed or eligible for listing on the National Register of Historic Places. Thirteen cultural resource studies have previously been conducted within a one-half mile radius of the Project Area. Three cultural resources have been identified and documented including two historic- and one prehistoric-era resource. One historic-era resource is located adjacent to the project site.

A review of historic maps was conducted to determine the timing of development within the Project Area and identify any historic features. A gap in availability of historic maps occurs between 1877 and 1942, with the 1942 USGS map being the first to show the Project Area in detail. The 1942 map depicts suburban development in the City. Blosser Lane south of Franklin Avenue is not yet paved during this time and no building or development are present in the Project Area. Maps of the Project Area from 1954 indicate paved roads surrounding three sides of the site as well as the Willits Redwood Product Company, a lumber yard immediately adjacent to the site which is still in operation today. Subsequent maps show increased development around the Project Area including several residential developments.

A field survey was conducted to determine the presence of any buried historic- or prehistoric-era artifacts. Due to seasonal grasses and berry bushes, ground visibility was moderate. Shovel test were conducted at approximately 30 meter intervals throughout Project site and surrounding area to probe

the surface and expose mineral soil beneath the ground cover. No resources were identified during the field survey.

Cultural Resources Impact Discussion

6.5(a) (Historical Resources) Less Than Significant Impact with Mitigation: Due to an absence of buildings and structures on the project site, there is no potential for the project to impact historic buildings or structures. A past cultural resource study identified a historic-era cultural resource within close proximity of the site. Though the Project does not propose physical development, the foreseeable future residential development of the site has the potential to impact this historic-era cultural resource.

To mitigate potential impacts of future development of the site to historical resources, **Mitigation Measure CUL-1**, shall be implemented. Measure CUL-1 states that if any previously unidentified resources are encountered during project implementation, they shall be avoided, and a qualified archaeologist shall be contacted to evaluate the find. With mitigation, the potential for any future development of the site to adversely impact historic-era cultural resources will be reduced to less than significant.

6.5(b) (Archaeological Resources) Less Than Significant Impact with Mitigation: Though no archaeological resources were found in the Project Area during the intensive field survey, given the site setting and known resources in the area there is a moderate to high potential of encountering buried archaeological resources. Though the Project does not propose physical development, future development facilitated by the Project has the potential to uncover archaeological resources during ground disturbing activities such as grading and excavating. Implementation of **Mitigation Measure CUL-1** will ensure that future development of the site does not adversely impact archaeological resources and will therefore result in a less than significant impacts.

6.5(c) (Discovery of Human Remains) Less Than Significant Impact with Mitigation: No evidence suggests that human remains have been interred within the boundaries of the Project Area. However, in the event that human remains are discovered to be present during ground disturbing activities associated with a future project, all requirements of state law shall be complied with, as set forth in **Mitigation Measure CUL-2**. This measure requires that ground disturbing activities in the vicinity of the discovery are immediately halted and the Mendocino County Coroner and qualified archaeologist are contacted to perform an evaluation of the discovery. Implementation of CUL-2 will ensure that in the event of the accidental discovery of buried human remains, potential adverse impacts to such remains will be reduced less than significant.

Mitigation Measures:

CUL-1: In the event that previously unidentified cultural resources are encountered during project implementation such resources shall be avoided, including altering the materials and their stratigraphic context. A qualified professional archaeologist shall be contacted to evaluate the find. Project personnel shall not collect cultural resources. Prehistoric resources include, but are not limited to, chert or obsidian flakes, projectile points, mortars, pestles, and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources include stone or abode foundations or walls, structures and remains with square nails, and refuse deposits or bottle dumps, often located in old wells or privies.

CUL-2: In the event that human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and the Mendocino County Medical Examiner, Willits Police Department, and a qualified archaeologist must be notified immediately to evaluate the remains. If the remains are deemed to be Native American and prehistoric, the Native American Heritage Commission must be contacted by the Coroner so that a “Most Likely Descendant” can be designated and further recommendations regarding treatment of the remains can be provided.

6.6. Energy

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: Willits General Plan Vision 2020; General Plan EIR; and California Energy Commission.

Existing Energy Setting

Energy resources include electricity, natural gas, and other fuels. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. Energy production and use result in the depletion of nonrenewable resources such as oil, natural gas, and coal, as well as the emission of pollutants. Energy usage is typically quantified using the British Thermal Unit (BTU). The BTU is the amount of energy required to raise the temperature of one pound of water by one-degree Fahrenheit. The approximate amount of energy contained in a gallon of gasoline, 100 cubic feet (one therm) of natural gas, and a kilowatt hour of electricity is 123,000 BTUs, 100,000 BTUs, and 3,400 BTUs, respectively.

Electricity

The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. Electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid.

Energy capacity, or electrical power, is generally measured in watts while energy use is measured in watt-hours. For example, if a light bulb has a capacity rating of 100 watts, the energy required to keep the bulb on for 1 hour would be 100 watt-hours. If ten 100-watt bulbs were on for 1 hour, the energy required would be 1,000 watt-hours or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts, which is one million watts, while energy usage is measured in megawatt-hours (one million-watt hours) or gigawatt-hours (GWh), which is one billion watt-hours.

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the State, and delivered through high-pressure transmission pipelines. Natural gas is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel. Natural gas is measured in terms of cubic feet.

California Energy Consumption

According to the California Energy Commission (CEC), total system electric generation for California in 2018 was 285,488 gigawatt-hours (GWh).¹² California's non-CO₂ emitting electric generation categories (nuclear, large hydroelectric, and renewable generation) accounted for more than 53 percent of total in-state generation for 2018. California's in-state electric generation was 194,842 GWh and electricity imports were 90,648 GWh.

According to the CEC, nearly 45 percent of the natural gas burned in California was used for electricity generation, with the remainder consumed in the residential (21 percent), industrial (25 percent), and commercial (9 percent) sectors. In 2012, total natural gas demand in California for industrial, residential, commercial, natural gas vehicles, and electric power generation was 2,313 billion cubic feet.¹³

According to the CEC, gasoline has remained the dominant fuel within the transportation sector, with diesel fuel and aviation fuels following. In 2016, California consumed approximately 15 billion gallons of gasoline and approximately 3.35 billion gallons of diesel fuel. An increasing amount of electricity is being used for transportation energy, which is attributed to light-duty plug-in electric vehicles. In 2016, transportation in California, consisting of light-duty vehicles, medium/heavy-duty vehicles, trolleys, and rail transit, consumed approximately 1.53 million megawatt hours (MWh).¹⁴

Sonoma Clean Power

Sonoma Clean Power is a program that allows businesses and residents in Mendocino and Sonoma Counties to purchase energy created from renewable resources, including geothermal, solar, wind, water, and biomass. This service provides energy through alternative generation processes while

¹² California Energy Commission, Total System Electric Generation (2018), <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2018-total-system-electric-generation>, Accessed June 15, 2020.

¹³ California Energy Commission, Supply and Demand of Natural Gas in California, https://www2.energy.ca.gov/almanac/naturalgas_data/overview.html, Accessed June 15, 2020.

¹⁴ California Energy Commission, 2017 Integrated Energy Policy Report <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2017-integrated-energy-policy-report>, Accessed June 15, 2020.

using existing infrastructure through PG&E for delivery. By using existing delivery infrastructure, Sonoma Clean Power is billed to customers through PG&E for providing electric generation service. In 2016, 88% of eligible customers were receiving electricity from Sonoma Clean Power. As of 2018 Sonoma Clean Power had 39% fewer greenhouse gas emissions as compared to PG&E.¹⁵

Willits General Plan

Future development that would be facilitated by the proposed General Plan Amendment and Rezone Project is subject to goals, policies, and implementation measures set forth in the Willits General Plan and Draft Safety Element which seek to reduce energy consumption. The following are particularly relevant to the conceptualized residential development that would be facilitated by the proposed Project.

- Housing Policy 5.280: Promote energy efficiency in residential construction.
- Housing Implementation Measures 5.340: Encourage applicants to meet with Pacific Gas and Electric Company regarding energy efficiency early in the process of designing residential development projects.
- Safety Element Policy S-4.8: Prepare and periodically update a Climate Action Plan for the City that integrates climate adaptation and hazard mitigation information and analysis.
- Safety Element Policy S-5.6: Identify and analyze potential backup power generation appropriate for the community, including the feasibility of developing alternative energy generation and the use of a microgrid to support critical city functions.
- Safety Element Policy S-5.7: Promote and enhance Sonoma Clean Power resources through the creation of new clean energy alternative power generation facilities that can support the local community during an emergency event.

Energy Impact Discussion

6.6(a) (Wasteful, Inefficient, Unnecessary Consumption of Energy) Less Than Significant Impact: Future development of the site would involve the use of energy during construction and at operation.

Construction Activities

Though no physical development is proposed at this time, the future residential development of the site would involve construction activities including site preparation, grading, paving, and building construction which would consume energy in the form of gasoline and diesel fuel through the operation of heavy off-road equipment, trucks, and worker trips to and from the site. Consumption of such resources would be temporary and would cease upon the completion of construction. Future construction activities at the site would be subject to provisions which limit idling as set forth in Mitigation Measure AQ-1, ensuring that construction would not result in inefficient energy consumption. As such, construction-related energy impacts would be less than significant.

Operation

¹⁵ Sonoma Clean Power 2019 Annual Report, <https://vimeo.com/379072737>, accessed June 22, 2020.

Long-term operational energy use from a residential development would include electricity consumption associated with new buildings (e.g., lighting, electronics, heating, air conditioning, refrigeration), energy consumption related to water usage and solid waste disposal, and fuel consumption (gasoline and diesel) from the generation of new vehicle trips.

While the long-term operation of a future development at the site would result in an increase in energy consumption compared to existing conditions, the project would be required to incorporate design measures related to electricity and water use in compliance with Title 24, and all applicable requirements of the City of Willits to minimize energy consumption. Furthermore, Sonoma Clean Power is the default provider in the City of Willits and would provide clean energy from renewable resources. As such, the proposed General Plan Amendment and Rezone Project, and future development of the site would not result in the wasteful, inefficient, and unnecessary consumption of energy and impacts would be less than significant.

6.6(b) (Conflict with State or Local Plan) Less than Significant Impact: The City of Willits does not currently have a locally adopted plan addressing renewable energy and energy efficiency.

In December 2007, the CEC prepared the State Alternative Fuels Plan in partnership with the CARB and in consultation with the other state, federal, and local agencies.¹⁶ The plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce greenhouse gas emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality. Future development of the site as a residential use would require installation of energy conservation features in compliance with CalGreen and California Energy codes. As such, the proposed Project, and future development facilitated by the Project would not conflict with or obstruct implementation of the State Alternative Fuels Plan and impacts would be less than significant.

Mitigation Measures: None required.

6.7. Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

¹⁶ California Energy Commission, Final Adopted State Alternative Fuels Plan, Adopted December 2007, <https://www2.energy.ca.gov/2007publications/CEC-600-2007-011/CEC-600-2007-011-CMF.PDF>, Accessed June 15, 2020.

recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Publication 42.				
ii. Strong Seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in California Building Code, creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Sources: Willits General Plan Vision 2020; General Plan EIR; 2019 Draft Safety Element; CA Geological Survey; CA Dept of Conservation; and United States Geological Survey.

Existing Geology and Soils Setting

The City of Willits is located in the western portion of Little Lake Valley and is a relatively level area consisting of alluvial deposits. Soils vary from well to poorly drained. Active faults within the area that could generate strong ground shaking include the San Andreas, Maacama, and Bartlett Springs fault. The Maacama fault runs through the City and is identified as an Alquist-Priolo fault zone, which is an area where an active fault has the potential to cause surface rupture during an earthquake. As stated in the Draft Safety Element of the General Plan, recent estimates suggest the potential for a 6.25 magnitude earthquake within the next 30 years.

Landslides occur when forces acting down-slope exceed the strength of the earth materials that compose the slope. There are multiple causes of landslides including earthquakes and rainfall. The City of Willits has the potential to experience risk from landslides, primarily along the southern and western parts of the City. Liquefaction occurs when vibrations caused by earthquakes cause saturated soils to lose stability. Though the City has not historically been impacted by risks associated with liquefaction, the safety element identifies areas prone to liquefaction where groundwater is less than 50 feet below the surface.

The following policies, which are intended to improve community resilience to seismic and geologic hazards are particularly relevant to the proposed General Plan Amendment and Rezone Project, and future residential development that would be facilitated at the site by the Project.

- **Policy S-1.2:** Identify if existing and new structures are located within Alquist-Priolo Special Study Hazard Zones and in areas at risk from liquefaction and landslides and take corrective action to minimize the risk of injury or damage from seismic or geologic events.
- **Policy S-1.4:** Require new development comply with state requirements regarding fault setbacks and accommodate larger setbacks where feasible.
- **Policy S-1.5:** Require new development to observe 30-foot setbacks from all hillsides and other sloped surfaces that show medium to high landslide susceptibility (Class VII or greater).
- **Policy S-1.6:** Restrict development in areas prone to liquefaction and/or landslide unless an independent geotechnical investigation determines the site is safe for development.

Geology and Soils Impact Discussion

6.7(a.i) (Faults) Less Than Significant Impact: Fault rupture occurs when the ground surface fractures as a result of fault movement during an earthquake and almost generally follows preexisting fault traces, which are zones of weakness. The project site does not fall within the Alquist-Priolo Fault Zone and no identified active faults traverse the site. As such, there is no expectation that the site would be vulnerable to fault rupture. The nearest fault with surface rupture is the Maacama Fault. The Alquist-Priolo Zone of the Maacama Fault is located approximately 0.25 miles east of the project site (**Figure A-3 in Appendix A**). Generally, structures intended for human occupancy are required to be placed a minimum of 50 feet from an active fault. The site is located approximately 1,320 feet west of the Alquist-Priolo Zone, therefore, the Project and future development of the site would have a less than significant impact related to risk of fault-related ground rupture during earthquakes within the limits of the site due to a known Alquist-Priolo Earthquake Fault Zone.

6.7(a.ii) (Ground-Shaking) Less Than Significant Impact: The intensity of earthquake motion is dependent on the characteristics of the generating fault, distance to the fault and rupture zone, earthquake magnitude, earthquake duration, and site-specific geologic conditions. Though there is no physical development proposed at this time, future residential development that would be allowed by the General Plan and Rezone Project has the potential expose people and structures to adverse effects from strong shaking during a seismic event. Upon formal submittal of a development proposal, a site-specific design-level geotechnical investigation will be required. Furthermore, future residential development will be required to comply with the latest California Building Standards Code seismic requirements. As such, the Project and future development of the site will result in less than significant impacts from potential impacts of ground shaking that could result in substantial adverse effects to people or structures, including the risk of loss, injury, or death.

6.7(a.iii) (Seismic-Related Ground Failure/Liquefaction) Less Than Significant Impact with Mitigation: The General Plan Safety Element identifies areas with groundwater less than 50 feet from the surface as being susceptible to liquefaction. Though there is no physical development proposed at this time, **Mitigation Measure GEO-1** requires the preparation of a site-specific geotechnical investigation for a future development, which shall include an analysis of geologic hazards, including liquefaction potential. Based on the outcome of the analysis, site-specific design will be required to incorporate recommended design specifications that reduce the risk of ground failure due to liquefaction. As such, the Project and future development of the site will have a less than significant impact due to risk of loss, injury, or death involving seismic-related ground failure and liquefaction.

6.7(a.iv) (Landslide) No Impact: The risk of landslide is dictated by several factors including precipitation conditions, soil types, steepness of slope, vegetation, seismic conditions, and level of human disturbance. When certain conditions are present, landslides can be triggered as a result of seismic activity. Based on the site's relatively flat topography, the subject project is not located in an area susceptible to landslides. Therefore, the Project and future development at the site would have no impacts due to loss of structures or life from landslides.

6.7(b) (Soil Erosion) Less Than Significant Impact with Mitigation: Future construction on the site would require site preparation including the removal of vegetation and grading to achieve uniform distribution of soil across the site. These ground disturbing activities have the potential to result in soil erosion or the loss of topsoil if not properly controlled. As identified in the Air Quality section of this analysis, a future development proposal for the site will be required to comply with dust control measures set forth by the Mendocino County Air Quality Management District during construction. Additionally, **Mitigation Measure GEO-2** requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which shall include provisions that address erosion and sediment controls. As such, the Project and future development of the site will have a less than significant impact related to erosion and the loss of topsoil.

6.7(c) (Unstable Geologic Unit) Less Than Significant Impact with Mitigation: Lateral spreading, lurching, and associated ground failure can occur during strong ground shaking on certain soil substrates typically on slopes. Lurching generally occurs along the tops of slopes where stiff soils are underlain by soft deposits or along steep channel banks whereas lateral spreading generally occurs where liquefiable deposits flow towards a "free face," such as channel banks, during an earthquake.

As previously discussed, the project site is relatively flat and does not contain steep channel banks. Furthermore, Mitigation Measure GEO-1 requires the preparation of a site-specific geotechnical investigation to identify and address potential liquefaction risks associated with future development of the site that would be allowed under the General Plan Amendment and Rezone Project. Therefore, potential impacts related to lateral spreading, lurching, and associated ground failure would be less than significant.

6.7(d) (Expansive Soils) Less than Significant Impact with Mitigation: Typically, soils that exhibit expansive characteristics are found within the upper five feet of the ground surface. Over long-term exposure to wetting and drying cycles, expansive soils can experience volumetric changes. The adverse effects of expansive soils include damage to foundations, utilities and infrastructure, paved roads and streets, and concrete slabs. Expansion and contraction of soils, depending on the season and the amount of surface water infiltration, could exert enough pressure on structures to result in cracking, settlement, and uplift. As discussed throughout this section, Mitigation Measure GEO-1 requires the preparation of a site-specific geotechnical investigation, which will include an analysis of

expansive soils and provide recommendations on treatment, replacement, grading, and foundation design. As such, the Project and future development of the site would have a less than significant impact related to a substantial direct or indirect risk to life or property as a result of expansive soils.

6.7(e) (Septic Tanks) No Impact: Future development of the site would connect to the existing sanitary sewer system that conveys effluent to the City's wastewater treatment facility. There are no onsite septic tanks and no alternative wastewater treatment facilities are expected to be proposed as part of a future development proposal at the Site. Therefore, there would be no impacts due to the disposal of wastewater where sanitary sewers are not available.

6.7(f) (Paleontological Resources) Less Than Significant with Mitigation: The Willits General Plan does not identify the presence of any paleontological or unique geological resources within the City. There is a low potential for paleontological resources to be present on the project site. Nevertheless, the potential remains for the discovery of buried paleontological resources. **Mitigation Measure GEO-3**, will ensure that proper procedures are followed in the event of a paleontological discovery. Therefore, the Project and future development of the site will have a less than significant impact related to the destruction of paleontological or geological resources.

Mitigation Measures:

GEO-1: Upon submittal of a development proposal for the site, a detailed design level Soils Investigation/Geotechnical Report shall also be prepared and submitted for review. The report shall at a minimum address potential for liquefaction, R-values, expansive soils and seismic risk. Plans shall incorporate all design and construction criteria recommended in the Soils Investigation/Geotechnical Report. Prior to City approval of the Improvement Plans, the geotechnical engineer shall sign off on the cover sheet confirming that the plans are in conformance with their recommendations. If at any time, prior to final acceptance of the project improvements, the City Engineer requests an independent geotechnical investigation and report, then an independent geotechnical engineer, shall be retained by the City at the Applicant's expense, to conduct requested investigations.

GEO-2: Upon submittal of a development proposal for the site and prior to approval of the Improvement Plans, the Applicant shall submit a copy of their Storm Water Pollution Prevention Plan (SWPPP) and Notice of Intent (NOI) for coverage under the State Water Resources Control Board's General Construction Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order 2009-0009-DWQ).

GEO-3: In the event that paleontological resources, including individual fossils or assemblages of fossils, are encountered during construction activities all ground disturbing activities shall halt and a qualified paleontologist shall be procured to evaluate the discovery and make treatment recommendations.

6.8. Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: Willits General Plan Vision 2020; General Plan EIR; MCAQMD CEQA Criteria and GHG Pollutant Thresholds Advisory; MCAQMD Adopted Air Quality CEQA Thresholds of Significant, June 2010; MCAQMD Policies for Areas Containing Naturally Occurring Asbestos Advisory; MCAQMD Air Quality Setting for Environmental Document; MCAQMD Particulate Matter Attainment Plan, 2005; and CALEEMod Version 2016.3.2, run date June 22, 2020.

Existing Greenhouse Gas Emissions Setting

Greenhouse gases (GHGs) are generated naturally from geological and biological processes as well as human activities including the combustion of fossil fuels and industrial and agricultural processes. GHGs include carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₃), chlorofluorocarbons, hydrofluorocarbons, and perfluorocarbons.

While GHGs are emitted locally, they have global implications. GHGs trap heat in the atmosphere, which heats up the surface of the Earth. This concept is known as global warming and is contributing to climate change. Changing climatic conditions pose several potential adverse impacts including sea level rise, increased risk of wildfires, degraded ecological systems, deteriorated public health, and decreased water supplies.

To address GHGs at the State level, the California legislature passed the California Global Warming Solutions Act in 2006 (Assembly Bill 32), which requires that statewide GHG emissions be reduced to 1990 levels by 2020. Executive Order (EO) S-3-05 provides the California Environmental Protection Agency with the regulatory authority to coordinate the State's effort to achieve GHG reduction targets. EO S-3-05 goes beyond AB 32 and calls for an 80 percent reduction below 1990 levels by 2050. Senate Bill 375 has also been adopted, which seeks to curb GHGs by reducing urban sprawl and limiting vehicle miles traveled.

The MCAQMD has adopted CEQA thresholds of significance for greenhouse gas emissions associated with the operation of land use projects. As identified in the thresholds adopted by the District in June 2010, a project is considered to have a less than significant impact due to GHG emissions if it:

1. Emits less than 1,100 metric tons (MT) CO₂e per year; or
2. Emits less than 4.6 MT CO₂e per service population per year (residents and employees).

Greenhouse Gas Emissions Impact Discussion

6.8(a-b) (Significant GHG Emissions, Conflict with GHG Plan) Less Than Significant Impact: The California Emissions Estimator Model Version 2016.3.2 was used to estimate GHG emissions associated with construction and operation of a future multi-family residential development that would be permitted through approval of the proposed General Plan Amendment and Rezone Project (**Appendix B**). A summary of GHG emissions during construction and at operation are presented below.

Construction GHG Emissions

Future construction of a multi-family residential project at the site would result in GHG emissions from heavy-duty construction equipment, worker trips, and material delivery and hauling. Construction GHG emissions are short-term and would cease upon completion of construction. GHG emissions were computed to be 437 metric tons of CO₂e for the total construction period.

The MCAQMD has not established thresholds of significance for GHG emissions resulting from construction activities. Regulation 1, Rule 1-430, which requires best management practices (BMP) to reduce GHG emissions during construction. As stated under the air quality topic above, mitigation measures AQ-1 and AQ-4 shall be implemented, which will further reduce GHG emissions generated during construction activities. Therefore, impacts from GHG emissions during construction will be less than significant.

Operational GHG Emissions

Operational GHG emissions associated with future development of the site as a residential use would be ongoing for the life of the project as a result of onsite lighting, heating, and cooling of buildings and structures, the treatment and transport of water and wastewater, solid waste disposal, maintenance activities, and vehicle trips associated with residents, visitors, delivery vehicles, etc.

CalEEMod Version 2016.3.2 was used to estimate emissions associated with operation of a future 111-unit multi-family development that would be permitted under the proposed General Plan Amendment and Rezone Project. Using the California Department of Finance population and housing estimates for the City of Willits in 2020, the service population (number of residents) for a future 111-unit residential project was estimated to be 274.¹⁷ Home-to-work trip distance was changed from 10.8 miles to 8.5 miles to reflect available data published in the Vehicle Miles Traveled Regional Baseline Study prepared by Fehr & Peers.¹⁸ Based on data contained in the report, and the Mendocino Council of Governments (MCOG) SB 743 Screening Tool, the TAZ in which the project is located is estimated to have a home-based VMT of 8.5.¹⁹ It should be noted that CalEEMod allows the user to incorporate mitigation measures and analyzes GHG emissions based on non-mitigated and mitigated scenarios. Integration of below market rate (BMR) housing was incorporated as a mitigation under mobile land use. The purpose of incorporating this mitigation is based on the conceptual residential project being analyzed, which includes 35% below market rate units consistent with State Density Bonus law.

Table 4 below shows the annual GHG emissions in metric tons of carbon dioxide equivalence for a conceptual multi-family development. The analysis assumes a future residential project would become operational in 2023. As shown below, the highest contributor to GHG emissions for a conceptual residential project is mobile sources, which includes vehicle trips and emissions associated with travel to and from the site. To account for emission control technology requirements, CalEEMod uses higher emission rates for older vehicles and lower emission rates for newer vehicles. As such, it can be assumed that later operational years would result in lower mobile source emissions and lower overall GHG emissions. As shown below, the service population emissions for a 111-unit multi-family

¹⁷ City of Willits persons per household 2020 estimate: E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark

¹⁸ Senate Bill 743 Vehicle Miles Traveled Regional Baseline Study, prepared by Fehr & Peers, May 20, 2020.

¹⁹ MCOG SB 743 Screening Tool, run date June 22, 2020.

residential development, without mitigation, would generate 4.57 MT CO₂e per year per service population in 2023 which is below the MCAQMD threshold of 4.6 MT CO₂e per year per service population. As such, a future residential development at the site will have a less than significant impact.

Table 4: Annual Project GHG Emissions for Multi-Family Residential

Source Category	2023 Operational Emissions (MT CO ₂ E)
Area	170.2
Energy Consumption	134.4
Mobile	904.6
Solid Waste Generation	25.7
Water Usage	17.2
Total Emissions	1,252.0
Service Population Emissions*	4.57
<i>MCAQMD Threshold (1,100 MT/CO₂e/year)</i>	<i>1,100</i>
<i>MCAQMD Threshold (4.6 MT/CO₂e/year/capita)</i>	<i>4.6</i>
Exceeds Threshold	No

Source: MCAQMD's Adopted Air Quality CEQA Thresholds of Significance - June 2, 2010; CALEEMod Version 2016.3.2, run date 6/22/2020

*assumes a service population of 274 residents

The City of Willits is not subject to a Climate Action Plan or other plan that provides prescriptive policies to reduce GHG emissions. Future development of the site will be subject to all applicable policies related to GHG reductions as well as standard conditions of approval. Therefore, the Project, and future residential development facilitated by the Project will not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, resulting in a less than significant impact.

Mitigation Measures:

6.9. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

involving the release of hazardous materials into the environment?

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

Sources: Willits General Plan Vision 2020; General Plan EIR; Draft 2019 Safety Element; 2014 Mendocino County Multi-Hazard Mitigation Plan; EnviroStor, accessed June 17, 2020; GeoTraker, accessed June 17, 2020.

Existing Hazards and Hazardous Materials Setting

The California Department of Toxic Substances Control (DTSC) defines a hazardous material as: “a substance or combination of substances that, because of its quantity, concentration or physical, chemical, or infectious characteristics, may either: 1) cause, or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating illness; or 2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.” Regulations governing the use, management, handling, transportation and disposal of hazardous waste and materials are administered by Federal, State, and local governmental agencies. Pursuant to the Planning and Zoning Law, DTSC maintains a hazardous waste and substances site list, also known as the “Cortese List.”

The Mendocino Solid Waste Management Authority (MendoRecycle) provides administrative oversight and program implementation for solid waste and recycling in Mendocino County. MendoRecycle also directly operates the household hazardous waste facility in Ukiah. The Mendocino County Department of Environmental Health serves as the Local Enforcement Agency (LEA) for the California Integrated

Waste Management Board (CIWMB), issuing permits and inspecting solid waste facilities to ensure compliance with state laws.

The Mendocino County Multi-Hazard Mitigation Plan was adopted in 2014 and serves as the local hazard mitigation plan for multiple jurisdictions within the County, including the City of Willits. The Plan complies with the Federal Disaster Mitigation Act of 2000 by assessing natural and human-caused hazards in the County and providing mitigation strategies to reduce risks. The Plan complements recent efforts undertaken by the City of Willits in the Draft 2019 General Plan Safety Element, which expands on existing hazards in the City and provides implementation measures to reduce impacts of these hazards.

The California Department of Forestry and Fire Protection (CAL FIRE) is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. CAL FIRE's Statewide and County maps (adopted November 2007) depict Fire Hazard Severity Zones (FHSZs) that are within the State Responsibility Area (SRA). The SRA is the area where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within city boundaries or in federal ownership. The FHSZs in the SRA are further classified as having a Moderate, High, or Very High hazard severity.

In addition, CAL FIRE has prepared and transmitted recommendations for FHSZ's in areas where local governments have financial responsibility for wildland fire protection, referred to as Local Responsibility Areas (LRAs). CAL FIRE has identified areas throughout the City of Willits as Very High, High, and Moderate FHSZ's. As shown in **Figure A-4 in Appendix A**, the project site is located less than 200 feet from an area classified as a Moderate Fire Hazard Severity Zone in a State Responsibility Area.

Hazards and Hazardous Materials Impact Discussion

6.9(a-b) (Routine Transport, Upset and Accident Involving Release) Less Than Significant Impact: Future development of the site would include site preparation and construction activities that would involve the temporary presence of potentially hazardous materials including, but not limited to, fuels and lubricants, paints, solvents, insulation, electrical wiring, and other construction related materials. Although these potentially hazardous materials may be present onsite during construction, a future development project would be required to comply with all existing federal, state and local safety regulations governing the transportation, use, handling, storage and disposal of potentially hazardous materials. Upon completion of construction activities there would not be ongoing use or generation of hazardous materials onsite. Furthermore, as a proposal to amend the existing permitted and conditionally permitted uses onsite from heavy industrial uses to residential uses, the Project will reduce the likelihood for the continued use of hazardous materials typically associated with heavy industrial operations. Therefore, impacts to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials would be less than significant.

Additionally, as discussed in the Hydrology and Water Quality section of this analysis, a Storm Water Pollution Prevention Plan (SWPPP) and Post Construction Stormwater and Operations Plan will be required by a future development project. Therefore, the impact of hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials from the proposed Project, and a future development facilitated by the Project will be less than significant.

6.9(c) (Emit or Handle Hazardous Material within ¼ Mile of Schools) Less than Significant Impact: The Project site is located within one-quarter mile of Blosser Lane Elementary School to the

southwest and Baechtel Grove Middle School to the west. As stated above, future development of the site would include the temporary presence of potentially hazardous materials during construction, which would be properly stored and labeled.

As the site is currently permitted for heavy industrial uses, the proposed General Plan Amendment and Rezone to allow for residential uses represents a more compatible use with the adjacent school and residences as handling and storage of hazardous materials onsite would be typical of residential use as opposed to the heavy industrial uses currently permitted. Compliance with applicable state and local regulations will ensure that potential impacts due to the proximity of schools to the subject site would be less than significant.

6.9(d) (Existing Hazardous Material Sites) Less than Significant Impact with Mitigation: The California Environmental Protection Agency (CAL-EPA) annually updates the California Hazardous Waste and Substances Site List, also known as the Cortese List. The Department of Toxic Substances Control compiles a record of sites to be included on the list, which is then submitted to the CAL-EPA. EnviroStor is the DTSC's data management system for tracking cleanup, permitting, and enforcement at hazardous waste facilities and sites with known contamination. A search of EnviroStor was performed on June 17, 2020 and showed no cleanup sites on or within close proximity to the Project site.

Geotraker is the State Water Resources Control Board's data management system for sites that impact or have the potential to impact water quality. A search of GeoTraker was performed on June 17, 2020 and showed no cleanup sites on the Project site. Results of the search found one closed cleanup site at 1150 Blosser Lane. The Leaking Underground Storage Tank (LUST) cleanup site was opened in 1992, remediated and closed in 1998. Though there is no indication that the project site has previously been affected by hazardous materials, the proximity of surrounding industrial uses could result in the site being affected by the presence of hazardous materials. **Mitigation Measure HAZ-1** requires that a Phase I Environmental Site Assessment (ESA) be prepared to identify any potential contamination onsite. A Phase I ESA includes research of current and historical use of the site that could have impacted soil or groundwater beneath the property, posing a potential threat to environmental or human health. In the event that contamination is identified remediation shall be required prior to introducing residences. Therefore, the Project, and any future development of the site will have a less than significant impact to the public or the environment by virtue of being located on or adjacent to an identified hazardous materials site.

6.9(e) (Public Airport Land Use Plans) No Impact: The Project site is not located within the boundaries of an airport land use plan nor is it located in direct proximity to a private airstrip. The nearest airport is the Willits Municipal Airport located approximately three miles north of the project site. Therefore, no impacts associated with airport-related hazards will result from the proposed Project nor future development of the site.

6.9(f) (Impair Emergency Response Plan) No Impact: Future development of the site is not expected to impair the implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan. A formal development proposal for the site will be required to demonstrate adequate onsite access to accommodate emergency vehicles, including adequate driveway/drive aisle width and turning radii.

California has developed an emergency response plan to coordinate emergency services by federal, state, and local government, including responding to hazardous materials incidents. The State Office of Emergency Services (OES) employs a Hazardous Materials Division, which enforces multiple

programs that address hazardous materials. Mendocino County Multi-Hazard Mitigation Plan serves City of Willits and there are no aspects of the proposed General Plan Amendment and Rezone Project, and subsequent development of the site that would interfere with an adopted emergency or evacuation plan. Therefore, no impacts are anticipated.

6.9(g) (Wildland Fire Hazards) Less Than Significant Impact: Wildland fires are of concern particularly in expansive areas of native vegetation of brush, woodland, and grassland. The Project site is surrounded by roadways and developed land uses. The site is categorized as a Non-VHFW by CAL FIRE, however, it is located within close proximity of lands designated as Moderate and High Fire Hazard Severity Zones by CAL FIRE. As such, the project could expose people or structures to impacts related to wildland fires. The City's 2019 Draft Safety Element identifies goals, policies, and implementation measures related to protecting the community from urban and wildland fire hazards. Particularly relevant to the future development of the site includes the requirement for all new development to comply with fire safety standards identified in the Willits Municipal Code (Policy S-3.5). Consistency with applicable General Plan policies and project-specific conditions as required by the Little Lake Fire District will ensure that future development of the site will have a less than significant impact related to wildland fire hazards.

Mitigation Measures:

HAZ-1: Upon submittal of a development applicant, a Phase I ESA shall be submitted which evaluates the environmental condition of the property and identifies potential environmental contamination onsite. In the event that contamination is identified, remedial actions shall be undertaken and clean up completed prior to issuance of occupancy.

6.10. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern on the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

i)	result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii)	substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii)	create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv)	impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Sources: Willits General Plan Vision 2020; General Plan EIR; Federal Emergency Management Agency; and North Coast Regional Water Quality Control Board.

Existing Hydrology and Water Quality Setting

The City of Willits is located at the base of Little Lake Valley and is within the Upper Main Eel River watershed between the Eel and Russian River basins. Elevations range from 1,325 to 1,500 feet. Haehl, Baechtel, Davis, Broaddus and Willits Creeks flow north through the valley converging in a poorly drained, marshy area to form Outlet Creek, a tributary of the Eel River.

The Mendocino County Water Agency is a special district encompassing the entirety of the County and governed by the Mendocino County Board of Supervisors. The Water Agency is responsible for the management of water resources in the County including stormwater and groundwater management.

Surface water quality is regulated by the North Coast Regional Water Quality Control Board (RWQCB) via the Water Quality Control Plan for the North Coast (Basin Plan). The RWQCB is responsible for implementing Section 401 of the Clean Water Act through the issuance of a Clean Water Certification when development includes potential impacts to jurisdictional areas such as creeks, wetlands or other Waters of the State.

A future development project at the site would be subject to the RWQCB Municipal Regional Stormwater National Pollution Discharge Elimination System (NPDES) Permit ("MS4"), Order No. R1-2010-0017, NPDES No. CA0023060, which requires permittees (i.e., City of Willits) to use their planning authorities to include appropriate source control, site design, and stormwater treatment measures in new development and redevelopment projects to address both soluble and insoluble stormwater runoff pollutant discharges and prevent increases in runoff flows from new development and

redevelopment projects. This goal is to be accomplished primarily through the implementation of low impact development (LID) techniques.

Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre, but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012-0005-DWQ) from the State Water Resources Control Board.²⁰ Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation. The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer. The SWPPP includes specifications for Best Management Practices (BMPs) to be implemented during construction activities to control potential discharge of pollutants from the construction area. Additionally, the SWPPP would describe measures to prevent pollutants in runoff after construction is complete and develops a plan for inspection and maintenance of the project facilities.

The Federal Emergency Management Agency's (FEMA's) flood hazard mapping program provides important guidance for the City in planning for flooding events and regulating development within identified flood hazard areas. FEMA's National Flood Insurance Program is intended to encourage State and local governments to adopt responsible floodplain management programs and flood measures. As part of the program, FEMA defines floodplain and floodway boundaries that are shown on the Flood Insurance Rate Maps (FIRMs) (**Figure A-5 in Appendix A**). As indicated in the 2019 Draft Safety Element, the Project site is not located within a flood hazard zone.

Hydrology and Water Quality Impact Discussion

6.10(a,e) (Violations of Water Quality Standards) Less Than Significant Impact with Mitigation:

Construction activities have the potential to result in runoff that contains sediment and other pollutants that could degrade water quality if not properly controlled. Sources of potential pollution associated with future construction of a residential development include fuel, grease, oil and other fluids, concrete material, sediment, and litter. These pollutants have the potential to result in impacts due to chemical contamination from the release of construction equipment and materials that could pose a hazard to the environment or degrade water quality if not properly managed.

As a standard condition of approval, future development will be required to adhere to NPDES requirements including the preparation and implementation of a SWPPP and compliance with the RWQCB Order No. R1-2010-0017, Waste Discharge Requirements. Erosion control requirements are stipulated in the NPDES Permit issued by the RWQCB. These requirements include the preparation and implementation of a SWPPP that contains BMPs. The purpose of the SWPPP is to identify potential sediment sources and other pollutants and prescribe BMPs to ensure that potential adverse erosion, siltation, and contamination impacts would not occur during construction activities.

At operation, a future residential project that would be facilitated by the General Plan Amendment and Rezone Project could result in stormwater runoff that would degrade water quality via non-point contaminants such as oils, grease, and exhaust that settles onsite. **Mitigation Measure HYDRO-1**

²⁰ State Water Resources Control Board, Construction General Permit Order 2009-0009-DWQ, http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml, Accessed August 12, 2019.

requires that a future development prepare a Post Construction Stormwater Operations Plan for review and approval by the City. Furthermore, prior to issuance of a building permit, the applicant will be required to enter into a Stormwater Maintenance Agreement with the City that provides the terms, conditions, and security associated with ongoing requirements of the Post Construction Stormwater Best Management Practices. As such, the Project, and future development facilitated by the Project will have a less than significant impact with regard to degradation of surface or ground water quality.

6.10(b) (Groundwater Supply and Recharge) Less Than Significant Impact: Though there is no physical development proposed at this time, it is assumed that a future residential development that would be permitted by approval of the General Plan Amendment and Rezone Project would utilize the City's existing potable water supply for all onsite water needs. Future development on the site would increase water demand relative to existing water use as it would change from vacant land to a residential development. However, in compliance with building code standards, a future development would include the use of high efficiency appliances and fixtures for interior water use. Additionally, a water efficient landscaping design would reduce water use for outdoor irrigation. A future development at the site would not substantially increase water use or deplete groundwater supplies nor would it interfere with groundwater recharge. Therefore, the Project, and future development facilitated by the Project would have a less than significant impact to groundwater supplies and recharge.

6.10(civ) (Drainage Pattern, Runoff and Storm Drain Capacity) Less Than Significant Impact: Due to the relatively flat nature of the site and the lack of impervious surfaces precipitation currently saturates the soil, infiltrates into the ground, and sheet flows downgradient. There is an intermittent stream that runs through the northeast portion of the site and has the ability to convey water across a portion of the site. Future development of the site would increase impervious surfaces as compared to existing conditions including building footprints, sidewalks, driveways, streets and circulation improvements. As a standard condition of approval, a future development proposal would be required to provide a drainage study prepared by a California Registered Civil Engineer with hydrologic and hydraulic calculation, and an analysis that supports the adequacy of the design and sizing of all public and private storm drain facilities including onsite detention, as warranted. Furthermore, as discussed in the Biological Resources section of this analysis, a future development proposal will be required to provide design considerations including buffering from the intermittent stream as well incorporating LID features. As such, potential impacts to the existing drainage patterns and storm drain system would be less than significant.

6.10 (d) (Flood Hazards, Seiche, Tsunami, Mudflow) No Impact: The Project site is located in an area of minimal flood hazard, as shown on FEMA's National Flood Hazard Layer. As such, future development of the site would have no impacts due to placing housing or structures within a 100-year flood hazard area. As no habitable structure would be placed within a flood hazard area there would be no impact due to significant risk of loss, injury or death associated with the Project, and future development facilitated by the Project. Similarly, the site is not located within an inundation area of a levee or dam, nor is the site expected to be impacted by inundation, as identified in the 2019 Draft Safety Element. Therefore, there would be no impact associated with risks due to flooding or inundation from a levee or dam failure, or from a seiche, tsunami or mudflow.

Mitigation Measures:

HYDRO-1: Upon submittal of a formal development application, the applicant shall also submit a Post Construction Stormwater Operations and Maintenance Plan for review and

approval by the City Engineer. The Plan shall provide a plan sheet showing all storm drain and water quality infrastructure that is to be maintained, along with detailed instructions and schedules for the ongoing maintenance and operation of all post-construction stormwater BMPs. Once approved and prior to issuance of any building permit, the property owner shall enter into a Stormwater Maintenance Agreement with the City that provides the terms, conditions, and security associated with the ongoing requirements of the Post Construction Stormwater Best Management Practices.

6.11. Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Sources: Willits General Plan Vision 2020; General Plan EIR; and Willits Municipal Code and Zoning Code.

Existing Land Use and Planning Setting

The City of Willits encompasses 2.8 square miles and is comprised of residential, industrial, commercial, open space, public facilities land uses and infrastructure. Based on data available in the General Plan Revision, adopted in 1992, residential and industrial land are the primary uses within the City (37% each), followed by commercial (14%), public facilities (10%), and open space (2%).

The Project site is currently designated Industrial-General (M-G) on the General Plan Land Use map and has a Zoning Designation of Heavy Industrial (MH). The M-G General Plan Land Use classification is applied to land that is best suited to a variety of industrial operations due to access, location, and availability of services as well as compatibility with surrounding uses. The site is surrounded by residential and Blosser Lane Elementary School to the south, Baechtel Grove Middle School to the east, lumber operations to the west, and a self-storage facility to the north, across the existing rail line.

The Project proposes to amend the General Plan Land Use to Residential Medium Density (R-M) with a Zoning Designation of Residential Medium-Density (R2). The R-M Land Use classification applies to areas of mixed residential uses that are most suitable for multi-family developments where all services, including schools, parks, and commercial facilities are within close proximity.

Land Use and Planning Impact Discussion

6.11(a) (Divide an Established Community) No Impact: Division of an established community typically occurs when a new physical feature, in the form of an interstate or railroad, physically

transects an area, thereby removing mobility and access within an established community. The division of an established community can also occur through the removal of an existing road or pathway, which would reduce or remove access between a community and outlying areas.

The Proposed project, and future development that would be facilitated by the General Plan Amendment and Rezone would not introduce a new physical feature that would remove mobility and access within an established community. As discussed in the Traffic Impact Study prepared for the Project, a future development could include an extension of Walnut Street through the northern portion of the site for pedestrian, bicycle, and emergency vehicle access. This connection is consistent with the Safe Routes to School Action Plan, which envisions a shared use path adjacent to or within the railroad right-of-way west of Locust Street and aligned with Walnut Street.²¹ This potential shared use path would potentially connect to the Blosser Lane Elementary drop-off loop, thereby increasing access for pedestrians, bicycles, and emergency vehicles. Future development of the site would not require removal of an existing road or pathway that could reduce or remove access between a community and outlying areas. Therefore, the project would have no impact due to the physical division of an established community.

6.11(b) (Land Use Plan, Policy, Regulation Conflict) Less Than Significant Impact with Mitigation:

Currently, the project site's land use designation and zoning permits heavy industrial type uses which could present a potential conflict with established adjacent uses including two schools and residences.

Approval of the proposed General Plan Amendment and Rezone, as well as future development of the site with a residential use would be generally consistent with the General Plan and other applicable land use plans and policies. Additionally, future development of the site will be required to comply with all applicable development standards of the R2 Zoning District including lot coverage, setbacks, yard requirements, height, and landscaping. A future residential development proposal permitted under the proposed Project will be reviewed for consistency by all applicable City departments and outside agencies and where applicable, a future project would be modified or conditioned to achieve consistency with regulations set forth by the City of Willits. The proposed Project (General Plan amendment and Rezone) would allow for more compatible uses adjacent to established schools and residential development.

Land Use Conflicts

The adjacent lumber yard to the west is an existing legal operation that influences ambient conditions in the vicinity of the Project site. The General Plan Amendment and Rezone Project would allow for new residential uses at the site which would introduce new sensitive receptors immediately adjacent to the existing lumber yard, potentially exposing future residents to potential noise, odor, and air quality impacts associated with the ongoing operation of the lumber facility. Though these impacts would not be caused by the proposed Project, approval of the General Plan Amendment and Rezone will likely result in a development proposal that introduces new sensitive receptors adjacent to a use that is potentially incompatible with a residential use.

The City's General Plan identifies policies and implementation measures to ensure the compatibility of land uses in the City. Specifically, General Plan Policy 1.220 calls for minimizing potential land use conflicts by defining compatible groups of activities, assigning appropriate land use designations, and

²¹ Safe Routes to School Action Plan, 2017, Figure 3, pg. 8.

requiring development standards and buffers to offset adverse project impacts on surrounding properties. Additionally, General Plan Policy 4.270 requires that uses be located where they will be most acoustically compatible with elements of the man-made and natural environment.

Consistent with the above mentioned General Plan policies and to ensure that the proposed Project and future residential development on the site do not introduce an incompatible land use, Mitigation Measure LU-1 is set forth below. **Mitigation Measure LU-1** requires that future development of the site provide a minimum 100-foot buffer along the western property line (shared with the existing lumber yard and designated Heavy Industrial) to ensure adequate separation of a future residential use from the adjoining lumber yard. Implementation of Measure LU-1 will introduce an appropriately sized buffer between the two properties to ensure compatibility with the surrounding built environment and mitigate potential incompatibilities with regard to adjacent land uses and in particular noise and air quality emissions generated by the existing industrial use.

As described previously, the area is surrounded by residential, indoor agricultural, commercial storage, public services (schools), heavy industrial (lumber yard), and an active railroad. Given the existing surrounding development, the re-designation of the site to allow residential uses would represent a more compatible use of the property with surrounding uses than that which is currently allowed under the existing industrial land use designation. With Measure LU-1, an appropriately scaled buffer of a least 100 feet will provide separations between the existing lumber yard and the future residential uses onsite that would be permitted by the proposed Project. As such, the proposed Project, and future development facilitated by the Project would have a less than significant impact due to a conflict with the City of Willits land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mitigation Measures:

LU-1: Plans submitted for formal development of the Project site shall indicate a minimum of a 100-foot buffer from the western property line (shared with the Lumber Yard facility) to ensure that exposure of future residents to excessive noise levels and air quality emissions are avoided. Proposal of less than a 100-foot buffer shall require supporting evidence such as technical analyses including but not limited to acoustical and air quality studies demonstrating compatibility based on noise standards and air dispersion modeling. Design considerations that may support a reduced buffer may include but are not limited to the following:

- Introduction of sound rated windows and doors along facades fronting the western property line.
- Enhanced landscaping, including trees, shall be provided in the buffer area along the western property boundary to dampen sound levels and lighting emanating from the existing lumber yard and between a future proposed development and the active railroad to the north.
- Installing a sound wall along the western property line.
- Incorporating forced air equipment into new homes along the western property line including enhanced filtration such as MERV 13.

6.12. Mineral Resources

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

Sources: Willits General Plan Vision 2020; General Plan EIR; and Mendocino County General Plan EIR, Chapter 4.6 Geology, Soils, and Mineral Resources.

Existing Mineral Resources Setting

The California Surface Mining and Reclamation Act of 1975 (SMARA) identifies mineral resources within California and requires classification of mineral resources based on their relative value for extraction. A variety of mineral resources, including aggregate resource minerals and hard rock quarries are known to exist in Mendocino County. According to the Division of Mine Reclamation, California Department of Conservation²² and the United States Geological Survey, Mineral Resources Data System²³, there are no mineral resources within the City of Willits nor in or around the project site.

Mineral Resources Impact Discussion

6.12(a-b) (Mineral Resources or Resource Plans) No Impact: There are no know mineral resources within the City of Willits nor does the City identify locally-important mineral resources in the General Plan. Therefore, the proposed Project and future development of the site would have no impact with regard to the loss of availability of mineral resources.

Mitigation Measures: None required

6.13. Noise

Would the project result in:	Potentially Significant Impact	Less Than Significant with	Less Than Significant Impact	No Impact

²² Division of Mine Reclamation, California Department of Conservation, Mines Online: <https://maps.conservation.ca.gov/mol/index.html>, accessed June 17, 2020.

²³ United States Geological Survey, Mineral Resources Data System, <https://mrdata.usgs.gov/general/map-us.html>, accessed June 17, 2020.

	Mitigation			
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: Willits General Plan Vision 2020; General Plan EIR; Willits Municipal Code: Chapter 17; and Transportation and Construction Vibration Guidance Manual, California Department of Transportation, September 2013.

Existing Noise Setting

Noise is generally defined as unwanted sound. It is characterized by various parameters that include the rate of oscillation of sound waves that cause pitch (frequency), the speed of propagation, and the pressure level or energy content (amplitude). The sound pressure level is the most common descriptor used to characterize the loudness of an ambient (existing) sound level. The decibel (dB) scale is used to quantify sound intensity but given that the human ear is not equally sensitive to all frequencies in the entire spectrum, noise measurements are weighted more heavily for frequencies to which humans are sensitive in a process called "A-weighting," written as "dBA" and referred to as "A-weighted decibels". In general, human sound perception is such that a change in sound level of 1 dB cannot typically be perceived by the human ear, a change of 3 dB is just noticeable, a change of 5 dB is clearly noticeable, and a change of 10 dB is perceived as doubling the sound level. The time in which noise occurs is an important factor to consider as it relates to impacts on people since nighttime noise tends to disturb people more than daytime noise. The Day-Night average (Ldn) and the Community Noise Equivalent Level (CNEL) are noise metrics which account for the greater sensitivity to noise during the nighttime. With the Ldn metric, nighttime sensitivity is accounted for by adding 10 dB to the nighttime period (10 p.m. to 7 a.m.). The CNEL metric is identical to the Ldn, except that it also adds 5 dB to the evening period (7 p.m. to 10 p.m.). Since Ldn and CNEL levels typically do not differ by more than 1 dBA, they are often used interchangeably.

Sources that contribute to the ambient noise levels within Willits include vehicular traffic, aircraft, trains, industrial activities, and mechanical equipment including refrigeration units, heating and cooling, and ventilation. Commercial and general industrial land uses are typically considered the least noise-sensitive, whereas residences, schools, and hospitals are considered to be the most noise-sensitive.

The Willits General Plan Land Use Compatibility Standards (Table 5-2) indicates that noise levels for multi- and single- family residential uses are considered normally acceptable in noise environments up to 60 dB CNEL/L_{dn}, conditionally acceptable between 60 and 70 dB CNEL/L_{dn}, normally unacceptable between 70 and 75 dB CNEL/L_{dn}, and clearly unacceptable above 75 dB CNEL/L_{dn}.

The project site is bounded by established residential, industrial, and public service land uses. Primary noise sources that contribute to the ambient noise environment at the Project site include vehicles driving on local roadways, operation of the Skunk Train which runs along the rail corridor immediately adjacent to the site, operation of surrounding industrial operations, and noise associated with nearby schools. As indicated in the General Plan, field measurements of noise throughout the City were conducted including two locations near the Project site at Blosser Lane Elementary School and Baechtel Grove Middle School. Average noise levels at the two locations were 47 and 50 dBA, respectively. Main sources of noise at Blosser Lane Elementary School included truck traffic associated with the adjacent industrial operation. At Baechtel Grove Elementary, students were identified as the main noise source. A review of historical imagery indicates that development in the immediate vicinity of the Project site has remained relatively the same as when noise measurements were taken for purposes of analysis to support the General Plan. Though noise was not projected for these locations at General Plan buildout, it was determined that the overall noise environment in the City was likely to improve with construction of the Highway 101 bypass, which was completed in 2016.

The project site is located in close proximity to existing sensitive receptors including existing surrounding residential uses to the north, east, and west of the project site.

The General Plan identifies policies and implementation measures that are indented to preserve the existing noise environment while also minimizing the exposure of residents to potentially harmful noise impacts. Particularly relevant to the proposed Project, and future development that will be facilitated by approval of the Project include:

- **Policy 4.210:** The City seeks to maintain ambient noise levels of 55 dBA (CNEL) in existing residential areas.
- **Policy 4.240:** Application processing procedures may require the submittal of appropriate acoustical data so that the noise impacts of proposed uses can be properly evaluated and mitigated.
- **Policy 4.250:** Noise from all sources should be maintained at levels that will not adversely affect adjacent properties or the community, especially during the evening and early morning hours.
- **Policy 4.260:** Noise created by temporary activities necessary to provide construction or required services should be permitted for the shortest duration possible and limited to time periods that will have the least possible adverse effect on surrounding land uses.
- **Implementation Measure 4.310:** Through the application review process, orient sensitive portions of buildings away from noise sources and encourage utilization of design techniques that will reduce adverse noise impacts.
- **Implementation Measure 4.360:** Encourage the use of landscaping and vegetation as noise buffers.

Noise Impact Discussion

6.13(a) (Exceed Established Noise Standards) Less Than Significant Impact with Mitigation: The proposed Project would allow future residential development of the site that would generate noise on a temporary basis during construction activities and on an ongoing basis upon occupancy.

Construction Noise

Construction of a future residential project would result in temporary and intermittent noise onsite and in the project vicinity from the use of construction equipment. Construction noise would be perceptible to established uses in the immediate vicinity including nearby existing residences to the south, students and employees of existing schools to the east and south, and employees of the adjacent industrial operations to the west.

Noise impacts resulting from construction of a future development at the site will depend upon the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction occurs over extended periods of time. During each stage of construction, there would be a different mix of equipment operating, and noise levels would vary based on the amount of equipment in operation and the location at which the equipment is operating. Typical construction equipment generates maximum noise levels between 80 to 90 dBA at a distance of 50 feet from the source.

Mitigation Measure NOI-1 includes construction management practices which help to reduce construction noise levels emanating from the site by limiting construction hours and minimizing disruption and annoyance due to noise exposure. With implementation of mitigation measure NOI-1, exposure of existing residents, students, and employees to excessive noise levels generated during future construction activities of a development at the site would be reduced to less than significant levels.

Operational Noise

For the purposes of this analysis, it is assumed that the General Plan Amendment and Rezone will facilitate future residential development on the site. At operation, a residential use would contribute to the ambient noise environment from the introduction of mechanical equipment, parking and circulation areas, outdoor areas, and vehicles traveling to and from the site.

General Plan Policy 4.210 seeks to maintain ambient noise levels of 55 dBA (CNEL) in existing residential areas. The Project site is in an area that contains established residential and industrial uses with an average noise level of 50 dBA. As the proposed Project would facilitate future residential uses noise levels are expected to be compatible. The siting and screening of mechanical equipment, heating ventilation and air conditioning, as well as parking areas and outdoor spaces shall be designed with consideration given to the surrounding established sensitive noise uses including the schools and the existing residences. To ensure compliance with the City's performance standard set forth in the municipal code regarding noise, Mitigation Measure NOI-2 shall be implemented at the time a future development application is submitted. **Mitigation Measure NOI-2** requires a future development proposal to include information on noise reduction strategies to ensure operation of a future residential use will not exceed performance standards set forth in the municipal code. As such, the Project, and future development of the site will have less than significant impacts.

Noise and General Plan Consistency

The proposed General Plan Amendment and Rezone would allow residential uses at the site which are not currently permitted under the existing industrial designations. At operation, a future multi-family residential use would introduce new sensitive noise receptors adjacent to an existing industrial operation. Exposure of new residents to elevated community noise levels does not constitute an environmental impact because ambient community noise levels are not caused by the project. Rather, exposure of new residents to excessive noise levels is addressed as a land use compatibility consideration as it relates to General Plan policies. As described in the Land Use and Planning section of this analysis, future development of the site will be required to provide a minimum 100-foot buffer from the western property line, or will be required to demonstrate through submittal of an acoustical study that noise from the adjacent industrial operation would not adversely impact new residents at the site. As such, the Project would not result in a potential conflict with the general plan related to noise compatibility due to introducing new residents to a site adjacent to Heavy Industrial activities with elevated ambient noise levels.

6.13(b) (Groundborne Vibration and Noise) Less Than Significant Impact with Mitigation:

Vibration from operation of heavy equipment can result in effects ranging from annoyance of people to damage of structures. Varying geology and distance results in different vibration levels containing different frequencies and displacements. In all cases, vibration amplitudes decrease with increasing distance from the source. Perceptible ground-borne vibration is generally limited to areas within a few hundred feet of construction activities. As seismic waves travel outward from a vibration source, they excite the particles of rock and soil through which they pass and cause them to oscillate. The rate or velocity (in inches per second) at which these particles move is the commonly accepted descriptor of the vibration amplitude, referred to as the peak particle velocity (PPV).

Caltrans establishes significance criteria for potential damage to structures as well as human perception. Groundborne vibration of 0.3 in/sec PPV is established for older residential structures and 0.5 in/sec PPV for newer residential structures. Groundborne vibration is considered barely perceptible to humans at 0.01 in/sec PPV and severe at 0.4 in/sec PPV. Development of the site would include construction activities that may generate perceptible vibration during use of heavy equipment or impact tools. Construction equipment including vibratory rollers, bulldozers, caisson drills, loaded trucks, and jackhammers generate vibration levels ranging from 0.003 in/sec PPV to 0.2 in/sec PPV at a distance of 25 feet.²⁴

Based on the significance criteria established by Caltrans and the typical groundborne vibration generated by construction equipment, future development of the Project site would not generate excessive groundborne vibration or noise in excess of 0.3 in/sec PPV at existing off-site uses. Therefore, the Project, and future development that would be permitted by approval of the Project would not expose people or structures to excessive groundborne vibration and impacts from groundborne vibration and noise would be less than significant.

6.13(c) (Airport Noise) Less than Significant Impact: The Project site is not located within the boundaries of an airport land use plan nor is it located in direct proximity to a private airstrip. The nearest airport is the Willits Municipal Airport located approximately three miles north of the project

²⁴ Transportation and Construction Vibration Guidance Manual, California Department of Transportation, Sept. 2013.

site. Though noise from aircrafts flying overhead would be perceptible at the Project site, people residing or working in the project area would not be exposed to excessive noise levels associated with such noise and therefore impacts would be less than significant.

Mitigation Measures:

NOI-1: The following Construction Best Management Practices shall be implemented during all phases of construction associated with future development of the site to reduce construction noise levels emanating from the site, limit construction hours, and minimize disruption and annoyance:

- Limit construction hours to between 7:00 a.m. and 7:00 p.m., Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturdays. No construction activities are permitted on Sundays and holidays.
- To the extent feasible, limit use of construction equipment to a distance of 50 feet or greater from residences.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines shall be strictly prohibited.
- Locate stationary noise-generating equipment such as air compressors or portable power generators as far as possible from sensitive receptors. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.
- Utilize air compressors and other stationary noise sources with the lowest acceptable dBA outputs where technology exists.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from existing residences.
- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.
- The contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. Avoid overlapping construction phases, where feasible.
- Notify all adjacent business, residences, and other noise-sensitive land uses of the construction schedule, in writing, and provide a written schedule of "noisy" construction activities to the adjacent schools and nearby residences.
- Coordinate with adjacent schools to schedule noisy construction activities outside of time of conflict such as during summer break or after school hours as feasible.

- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

NOI-2: The design, location, and screening of noise generating features, including but not limited to mechanical equipment and parking areas shall be designed to maximize distance from existing residences and schools. Noise reduction techniques if necessary shall be identified during application processing procedures and shall achieve the City's performance standards set forth in the municipal code. Submittal of appropriate acoustical data may be required to adequately evaluate noise impacts of a future use at the site and to ensure that proper noise reduction techniques are employed.

6.14. Population and Housing

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

Sources: Willits General Plan Vision 2020; General Plan EIR; 2019-2027 Housing Element; and U.S. Census Bureau, 2018 ACS 5-Year Estimates.

Existing Population and Housing Setting

The City of Willits encompasses approximately 2.8 square miles and includes 650 acres of land designated for residential use, 334 acres of which were identified as developed at the time of writing the General Plan. The existing General Plan has a horizon year of 2020 and estimates the population to be 7,700 at General Plan Buildout. According to the U.S. Census, the population in Willits in 1990 was 5,027 whereas the American Community Survey 2018 5-year estimate reports the population to

be approximately 4,893.²⁵ This represents an approximately 2.7% decrease in population from 1990. As identified in the 2019-2027 Housing Element update, the population growth in Mendocino County is expected to slow over the next five years.

Population and Housing Impact Discussion

6.14(a) (Substantial Unplanned Growth) Less Than Significant Impact: The proposed General Plan Amendment and Rezone Project would allow for residential development on the site that is not currently permitted under the industrial designation. Under the proposed rezoning, the approximately 5.68-acre site could accommodate up to 111 dwelling units, including 82 units permitted under the base density, and 29 units if a future residential development utilized the maximum 35% state density bonus. Assuming a 2.47 person household ²⁶ the projected population increase from a future multi-family development on the site would be approximately 274 people. The projected population does not represent a substantial increase and would remain within the population projects identified in the General Plan. The site is located in an area surrounded by existing development. The extension of utilities and roadways would be limited to provide services to the subject property and would not extend services to areas where services are currently unavailable. Therefore, the project will have less than significant impacts related to growth inducement.

6.14(b) (Substantial Housing or Persons Displacement) No Impact: A project would be considered to have a significant environmental effect if it displaces a large number of people or induces substantial growth or concentration of population. The General Plan Amendment and Rezone Project would allow for residential uses onsite that are not currently permitted. The site could accommodate a maximum of 111 multi-family residential units.

The Project site is currently vacant, undeveloped land. Implementation of the proposed Project, and future development facilitated by the Project would not displace existing housing units or people, nor necessitate the construction of replacement housing elsewhere. Therefore, the Project, and subsequent development of the site would have no impacts to population and housing with regard to displacing people or existing housing.

Mitigation Measures: None required.

6.15. Public Services

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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²⁵ United States Census Bureau, ACS Demographic and Housing Estimates, 2018
<https://data.census.gov/cedsci/profile?q=Willits%20city.%20California&g=1600000US0685600&tid=ACSDP5Y2018.DP05>,
 accessed June 17, 2020.

²⁶ City of Willits persons per household 2020 estimate: E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: Willits General Plan Vision 2020; General Plan EIR; and Willits Safe Routes to School Action Plan; City of Willits Police Department; Little Lake Fire District; and Willits Unified School District.

Existing Public Services Setting

The City of Willits provides Police Protection services within City boundaries. The Police Department is comprised 16 full-time employees when fully staffed including one police chief, three sergeants, six patrol officers, four dispatchers, one community services officer, and one volunteer. The Police Department is located in downtown Willits at 125 East Commercial Street.

Fire protection and emergency medical services are provided by the Little Lake Fire Protection District, which encompasses an approximately 240 square mile area inclusive of the City of Willits. The District employees approximately 40 full-time, part-time, and volunteer firefighters. The fire station is located within the City at 1575 Baechtel Road.

The City's public school system is made up of Willits Unified School District, which provides seven public schools including four elementary, one middle, and two high schools, and serves approximately 1,500 students. There are also two charter schools within the City that serve students K-12.

The City of Willits Public Works Department is responsible for the management and maintenance of the City's recreation facilities. The General Plan identifies approximately 27 acres of parkland, representing 5.3 acres per every 1,000 residents. Parks are disproportionately located in the center of the City, with approximately 90 percent of the total acreage contained in City Park, located on East Commercial Street between N Main Street and N Humboldt St, and Recreation Grove, located on East Commercial Street at S. Lenore Avenue. Babcock Park is the nearest park to the Project site, located approximately 0.4 miles to the east. The General Plan identifies sites for future parks and seeks to maintain the existing park-to-resident ratio through impact fees and requirements for onsite parks as part of development projects. In addition to parks located within the City, there are also recreational

opportunities provided by nearby privately help open space. Though the City does not control this land, it is anticipated to remain.

Public Services Impact Discussion

6.15(a-e) (Fire & Police Protection, Schools, Parks, Other Public Facilities) Less Than Significant

Impact: The Project site is well served by existing public services. It is expected that a future development on the site facilitated by the General Plan Amendment and Rezone would result in an increase in residents and visitors that would also increase the need for services from Fire and Police Departments, schools, and parks. However, the increase would represent a minimal change that would not trigger the need for an expansion of services, an increase in staffing, or otherwise adversely affect public services. Increasing demands on public services have been anticipated as part of General Plan buildout and are met with impact fees that provide funding for the incremental expansion of services as well as increases in sales and property tax revenues.

General Plan policy 7.230 establishes a five minute or two-mile travel distance as the maximum response time or travel distance from the nearest fire station. The Project site is located approximately 1.1 miles from the Little Lake Fire Department on Baechtel Road. As such, the Project site is within both the established response time and distance established by the City. Furthermore, the ability of emergency response vehicles to override traffic controls with lights, sirens, and signal pre-emption, and to travel in opposing travel lanes in congested conditions further ensures adequate response in the case of an emergency. Therefore, impacts to police and fire protection services as a result of a future development at the site would be less than significant.

The Project proposes to re-designate the General Plan and Zoning on the site from the currently allowed industrial uses to residential uses. As such, the Project is anticipated to facilitate future residential development of the site, which is expected to introduce new residents, including school-aged children. Though the Project, and future development facilitated by the Project would increase enrollment of nearby public schools, it is not anticipated to exceed existing capacity of these facilities. Furthermore, new residential developments are subject to school fees, which fund necessary improvements and offset any potential impacts of introducing new students to the area. Therefore, the Project, and future development of the site is expected to have a less than significant impact on public schools.

Future development of the site would not be expected to generate a substantial increase in demand that would warrant the expansion or construction of new public facilities, including parks within the vicinity of the Project site. General Plan policy 6.310 requires residential developers to set aside lands or provide in-lieu fees to ensure the City's parkland standard of five acres per 1,000 residents is maintained. As such, impacts to parks due to implementation of the General Plan Amendment and Rezone Project, and future residential development that would be facilitated by the Project will have a less than significant impact.

Mitigation Measures: None required.

6.16. Recreation

Would the project:	Potentially Significant Impact	Less Than Significant with	Less Than Significant Impact	No Impact

	Mitigation			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sources: Willits General Plan Vision 2020; General Plan EIR; Willits Chamber of Commerce.

Existing Recreation Setting

The City of Willits offers several active and passive outdoor recreational amenities including parks, trails, sporting facilities, and a City pool. The majority of established parks are located in the central part of the City. According to the General Plan, the City has approximately 27 acres of parks, which accounts for approximately two percent of the total land in the City. As discussed in the Public Services section of this document, the City's General Plan identifies a parkland ratio of 5 acres per 1,000 residents. Based on the General Plan buildout population of 7,700, the total area of parks needed to maintain the 5 acres per 1,000 residents at buildout would be 38.5 acres. The ACS 2018 estimates the population of Willits to be approximately the same as the population in 1990, 4,893 versus 5,027, respectively. As such, the City of Willits remains above the parkland ratio of 5 acres per 1,000 residents.

Recreation Impact Discussion

6.16(a-b) (Deterioration of Parks, Additional Recreational Facilities) Less Than Significant

Impact: The General Plan Amendment and Rezone Project will change the existing uses allowed onsite from industrial to residential. A future residential development on the site would introduce residents who would utilize existing parks and recreation facilities within the City. Existing facilities would be adequate to meet recreational demands of future residents at the site. Furthermore, a formal development proposal for the site would be required to demonstrate consistency with regulations that require active and passive recreation improvements. Because a future residential development at the site would not induce substantial population growth, is within the population growth anticipated in the General Plan, and would be required to comply with policies related to parks, there is little expectation that further pressure would be put on recreational amenities thereby requiring construction or expansion of such facilities. Therefore, impacts related to the increased use, deterioration, construction or expansion of recreational facilities are expected to be less than significant as a result of the proposed Project and a future residential development at the site.

Mitigation Measures: None required.

6.17. Transportation

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

Sources: Vision 2020 Willits General Plan Revision; General Plan EIR; City of Willits Bicycle and Pedestrian Specific Plan; Willits Safe Routes to School Action Plan; Technical Advisory on Evaluating Transportation Impact in CEQA, prepared by Office of Planning and Research, December 2018; Mendocino Council of Governments Transportation Planning Work Program FY 2019/2020; Senate Bill 743 Vehicle Miles Traveled Regional Baseline Study, prepared by Fehr & Peers, May 20, 2020; and Traffic Impact Study prepared by W-Trans, May 14, 2020.

Existing Transportation Setting

The City of Willits General Plan establishes goals, policies, and implementation measures that seek to maintain an integrated transportation network that provides for safe and convenient multi-modal travel. The transportation network within the City includes roadways, railways, buses, bikeways, and sidewalks. Roadways primarily consist of local and local-collector streets, which have relatively low daily traffic volumes and primarily carry residential traffic. Commercial Street and Sherwood Road are identified as collectors, which carry traffic within the City to arterial roadways, including State Route 20 and Main Street/Highway 101, which serves as the City's primary arterial roadway, carrying approximately 17,000 vehicles per day. The Highway 101 bypass, which officially opened in November 2016, diverts through highway traffic away from Main Street, which runs through the center of the City. The project site lies at the eastern terminus of Walnut Street, approximately one-quarter mile from its intersection with South Main Street.

Existing rail service in the City of Willits is provided by the California Western Railroad, also known as the Skunk Train, which provides passenger rail service between Fort Bragg to Willits and attracts tourism to the City.

The General Plan identifies alternative modes of transportation as an important aspect of the circulation network, providing multiple benefits including a reduction in traffic, improved air quality, and reduced noise levels. Bicycle and pedestrian facilities currently exist throughout the City, however,

gaps in the network are also present. The Bicycle and Pedestrian Specific Plan identifies bikeway improvements surrounding the project site including a Class II dedicated bike lanes on Walnut Street from Locust Street to Main Street (formerly Highway 101), and on Locust Street from Holly Street to Walnut Street. Additionally, both the Bicycle and Pedestrian Specific Plan and the Safe Routes to School Action Plan identify a Class I separated trail extending through the Project site as an extension of Walnut Street from Locust Street to Blosser Lane. All three bikeway improvements are classified as high priority.

Public transportation in the City is provided by Mendocino Transit Authority (MTA). Route 1 provides local service within the City, operating Monday through Friday with approximately one-hour headways. Route 20 provides service between Willits, Mendocino Community College, and the City of Ukiah, operating Monday through Friday with approximately one-hour headways. Route 65 operates seven days a week and provides regional service to and from Fort Bragg, Ukiah and Santa Rosa.

Vehicle Miles Traveled Discussion

Level of service (LOS), which is used to describe vehicle delay, has historically been used to measure traffic service within the City of Willits. Circulation Policy 2.210 establishes LOS 'D' or better along local streets, beyond which would be considered to have a significant impact to the circulation network. Pursuant to SB 743,²⁷ the Office of Planning and Research (OPR) was charged with identifying an alternative metric to LOS for evaluating environmental impacts from transportation. In December 2018 the OPR released the Technical Advisory on Evaluating Transportation Impacts in CEQA,²⁸ which provides technical recommendation regarding assessment of vehicle miles traveled (VMT), as an alternate to LOS, thresholds of significance for VMTs, and mitigation measures.

CEQA Guidelines section 15064.3 subdivision (b) describes specific considerations for evaluating a project's transportation impact using a VMT metric. This metric refers to the amount and distance of automobile travel attributable to a project. The provisions of Section 15064.3 will be effective July 1, 2020, unless a lead agency elects to be governed by the Guideline before that date. Moreover, Section 15064.3 provisions apply prospectively from that effective date, and do not apply to steps in the CEQA process completed before the effective date or to CEQA documents that were circulated for public review prior to July 1, 2020.

To date, the City of Willits has not adopted VMT thresholds. In June 2019 the Mendocino Council of Governments (MCOG), which serves as the Regional Transportation Planning Authority (RTPA) adopted the Transportation Planning Work Program for fiscal year 2019/2020. The Program included a grant request to conduct a Regional Baseline Study to analyze existing traffic conditions in the region, establish a baseline standard from which to determine significance thresholds for future land use projects, and develop technical tools and procedures for evaluating VMT impacts of development project.²⁹ In June 2020, the MCOG Board of Directors received the final Regional Baseline Study report from the traffic consultant, Fehr & Peers. The study summarizes available VMT data for Mendocino County, discusses alternative measurement methods and thresholds, recommends VMT methods and

²⁷ <http://opr.ca.gov/ceqa/updates/sb-743/>

²⁸ http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

²⁹ Mendocino Council of Governments Transportation Planning Work Program FY 2019/2020, <https://www.mendocinocog.org/files/e2524d37f/OWP+FY2019-20-Final+adopted%28web%29.pdf>, accessed June 2020

thresholds for lead agencies, and provides Transportation Demand Management (TDM) strategies for reducing VMT generated by projects. At the June 2020 meeting, the Board of Directors accepted the final Report prepared by Fehr & Peers.

Traffic Impact Study

A Traffic Impact Study (TIS) was prepared by W-Trans on May 14, 2020 (**Appendix E**). The purpose of the TIS is to evaluate the traffic impacts of a future development, which would be facilitated and reasonably foreseeable through implementation of the proposed Project, a General Plan Amendment and Rezoning. As described in the TIS, the proposed rezoning from Heavy Industrial (MH) to Residential Medium Density (R2) would result in an increase to the parcel's potential trip generation. The analysis assumes that a multi-family development, which is permitted by-right in the R2 zone, would facilitate higher density than a single-family development, thus resulting in a higher volume of vehicle trips. The TIS provides an overview of existing transportation conditions around the Project site and identifies the traffic impacts of a conceptual multi-family development. It should be noted that the TIS analyzes development of the site under the permitted density of the R3 zoning designation, which allows for higher density development as compared to R2. The analysis assumes a maximum of 165 residential units could be accommodated on the site, which is based on an approximate parcel size of 5.68 acres, and a maximum residential density of one dwelling unit per 1,500 square feet in the R3 zone. As such, the TIS provides a conservative analysis, and the proposed General Plan Amendment and Rezone Project has been fully analyzed under a higher density scenario.

The TIS evaluated operating conditions of four study intersections during the a.m. and p.m. peak hours (7:00 to 9:00 a.m. and 4:00 to 6:00 p.m.). The analysis includes a review of collision history, as well as intersection level of service under an existing, existing plus project, future, and future plus project scenario for the following intersections.

1. State Route 20/Blosser Lane
2. South Main Street/Hazel Street
3. Holly Street/Locust Street
4. South Main Street/Holly Street

Collision History

Collision history for the four study intersections was evaluated to determine if there are any prevalent trends or patterns which may indicate a safety issue. Collision rates were calculated for a five year period based on data published by the California Highway Patrol in the Statewide Integrated Traffic Records System (SWITRS). Two of the study intersections, South Main Street/Hazel Street and Holly Street/Locust Street did not have any collisions within the five year period evaluated. South Main Street/Holly Street had one collision and State Route 20/Blosser Lane had three collisions. Collision rates for the study intersections were compared to average rates for similar facilities, which are provided by the California Department of Transportation in the *2016 Collision Data on California State Highways*. Though the collision rate for State Route 20/Blosser Lane intersection was higher than the statewide average, all three collisions that occurred at the intersection were of a different type, which indicates a lack of a trend that does not imply a specific safety issue.

Existing and Future Intersection Level of Service

Existing traffic volumes for the four study intersections were collected during the a.m. and p.m. peak hour while surrounding schools were in session. As previously stated, the City of Willits has an

established significance threshold of LOS D on local roads, but with SB 743, LOS deficiencies are no longer considered environmental impacts. As shown below, the four study intersections, including minor approaches, currently operate at an acceptable LOS of D or better. In addition to existing intersection operations, the TIS also evaluated future operations, with and without future multi-family development at the Project site. The four study intersections were analyzed based on Caltrans segment growth volumes. As shown in the table below, the four study intersections are expected to continue operating acceptably under the existing and future scenarios without multi-family development at the site.

Table 5: Existing and Future Peak Hour Intersection Levels of Service (No Project)

Study Intersection <i>Approach</i>	EXISTING (NO PROJECT)				FUTURE (NO PROJECT)			
	AM PEAK		PM PEAK		AM PEAK		PM PEAK	
	<i>Delay</i>	<i>LOS</i>	<i>Delay</i>	<i>LOS</i>	<i>Delay</i>	<i>LOS</i>	<i>Delay</i>	<i>LOS</i>
1. State Route 20/Blosser Ln	11.4	B	4.9	A	12.5	B	5.0	A
<i>Northbound Approach</i>	18.5	C	11.3	B	20.1	C	11.6	B
<i>Southbound Approach</i>	25.3	D	13.5	B	29.1	D	13.9	B
2. South Main St/Hazel St	1.3	A	0.6	A	1.9	A	0.75	A
<i>Eastbound Approach</i>	17.0	C	14.3	B	26.2	D	18.4	C
<i>Westbound Approach</i>	13.7	B	11.7	B	17.0	C	13.2	B
3. Holly St/Locust St	8.4	A	7.8	A	9.1	A	8.2	A
4. South Main St/Holly St	12.3	B	10.6	B	15.3	B	12.8	B

Source: Traffic Impact Study prepared by W-Trans, May 14, 2020, Table 4 and Table 5

Transportation Impact Discussion

6.17(a) (Conflicts with Plans, Policies, Ordinances) Less Than Significant Impact: The Traffic Impact Study provides a conservative analysis of vehicle trip generation for the future development of the Project site as a multi-family residential project with up to 165 unit, although under the proposed General Plan Amendment and Rezoning up to 111 units could ultimately be accommodated. As previously stated, the TIS analyzed a multi-family use at the highest permissible density in the R3 zoning district and therefore, the proposed rezoning to R2, which has a lower permissible density, is fully analyzed. The trip generation for a multi-family residential development was estimated using rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual, 10th Edition*, 2017. Rates published for the Low Rise Multifamily Housing land use (ITE LU 220) were utilized. Table 6, shows the trip generation summary for a future multi-family development of 165 dwelling units. Using the rates available in the table below, a 111 unit multi-family development is anticipated to generate 813 daily trips, including 51 during the a.m. peak hour and 62 during the p.m. peak hour.

Table 6: Trip Generation Summary

Land Use	Units	DAILY		AM PEAK		PM PEAK	
		<i>Rate</i>	<i>Trips</i>	<i>Rate</i>	<i>Trips</i>	<i>Rate</i>	<i>Trips</i>
Apartments	165 du	7.32	1,208	0.46	76	0.56	92

Source: Traffic Impact Study prepared by W-Trans, May 14, 2020, Table 6

Existing Plus Project and Future Plus Project Intersection Level of Service

Existing plus project and Future plus project intersection level of service was evaluated to identify potential transportation conflicts from a future multi-family development that would be facilitated by the Project. Existing and future conditions with the addition of trips generated by a multi-family development would not result in degradation of intersection operations. As shown in Table 7, all four study intersections, including minor approaches, are expected to continue operating acceptably at LOS D or better under both existing plus project and future plus project scenarios. Therefore, a future residential development facilitated by the proposed Project would not conflict with the General Plan Policy 2.210, as all approaches would achieve LOS D or greater.

Table 7: Existing and Future Peak Hour Intersection Levels of Service (With Project)

Study Intersection <i>Approach</i>	EXISTING PLUS PROJECT				FUTURE PLUS PROJECT			
	AM PEAK		PM PEAK		AM PEAK		PM PEAK	
	<i>Delay</i>	<i>LOS</i>	<i>Delay</i>	<i>LOS</i>	<i>Delay</i>	<i>LOS</i>	<i>Delay</i>	<i>LOS</i>
1. State Route 20/Blosser Ln	11.9	B	4.9	A	13.2	B	5.1	A
<i>Northbound Approach</i>	20.1	C	11.3	B	22.1	C	11.9	B
<i>Southbound Approach</i>	25.5	D	13.6	B	29.3	D	14.0	B
2. South Main St/Hazel St	1.3	A	0.6	A	1.9	A	0.7	A
<i>Eastbound Approach</i>	17.1	C	14.5	B	26.5	D	18.8	C
<i>Westbound Approach</i>	14.0	B	11.1	B	17.4	C	13.3	B
3. Holly St/Locust St	8.9	A	8.1	A	9.8	A	8.5	A
4. South Main St/Holly St	14.0	B	11.9	B	17.3	B	14.1	B

Source: Traffic Impact Study prepared by W-Trans, May 14, 2020, Table 9 and Table 10

Alternative Modes of Transportation

Public transit, bicycle, and pedestrian facilities in the project vicinity will not be substantially impacted by a future residential development that would be facilitated by the proposed Project. The introduction of additional residential units would contribute ridership to the public transit system. Existing bus stops are located on Locust Street, Holly Street, and South Main Street approximately one-quarter to one-half miles from the nearest property line of the Project site. The Mendocino County Transit system currently has sufficient capacity and facilities to support increased ridership generated by the proposed project. Therefore, impacts to public transit would be less than significant.

Due to the site's proximity to the downtown area and nearby schools, it is reasonable to assume that a future residential development would generate pedestrian and bicycle trips to and from the site. Gaps in the pedestrian network currently exist on Walnut Street from Locust Street to Magnolia Street, which would limit safe pedestrian access from the site to downtown. Gaps also exist on Locust Street between the Project site and Hazel Street. The Blosser Lane Trail, which connects Holly Street to Blosser Lane, provides bicycle and pedestrian access to Blosser Lane Elementary School.

As previously stated, the City of Willits Bicycle and Pedestrian Specific Plan identifies Walnut Street as a planned Class II, striped bike lane. As stated in the TIS, the existing width of Walnut Street would not accommodate a striped bike lane as currently designed. Based on the low volume and speed of Walnut Street and other surrounding local roadways, existing infrastructure in the vicinity of the Project site is expected to be adequate to serve increased bicycle use associated with a future residential development at the site. Additionally, the Bicycle and Pedestrian Specific Plan and Safe Routes to School Action Plan identify the Walnut Street extension as a planned Class I, separated trail. As stated in the TIS Walnut Street could be extended through the site to the school drop off-loop which would provide bicycle, pedestrian, and emergency vehicle access. Though the extension would not go all the way through to Blosser Lane.

Consistent with General Plan Policy 2.350, multi-family residential developments with 10 or more units would be required to provide bicycle storage facilities as a condition of project approval, which would be imposed on a future multi-family development application. Impacts due to a conflict with existing or planned bicycle and pedestrian facilities from future development of the site would be less than significant.

Summary

The proposed General Plan Amendment and Rezone and future development of the site facilitated by the Project will not conflict with an applicable plan, ordinance or policy. Therefore, the project would have less than significant impacts to the circulation system.

7.17(b) (Conflict with 15064.3(b) VMT) Less Than Significant Impact with Mitigation: As previously discussed, lead agencies are required to evaluate a project's potential impacts using a VMT metric as of July 1, 2020. Though no development is proposed by the General Plan Amendment and Rezone Project, the TIS evaluated the potential VMT that would be generated by a multi-family development facilitated by the Project. VMT was calculated by multiplying the average daily trips (600) by the average home-to-work trip distance available in the Caltrans Statewide Travel Demand Model (11.89 miles). Based on these metrics, a multi-family residential development would be expected to generate daily VMT of 7,134 miles. A Transportation Demand Management (TDM) Plan was prepared for the Project and provides a qualitative list of measures that reduce VMT. Measures included in the TDM plan are based on best practices and include options such as education and outreach materials, ridesharing programs, unbundled parking, bicycle incentives, and pedestrian and transit improvements.

As mentioned above, the Mendocino Council of Governments Board of Directors accepted the VMT Regional Baseline Study prepared by Fehr & Peers. The study provides lead agencies with a VMT screening tool, which allows for site specific analysis of VMT impacts. Though the City of Willits has not officially adopted thresholds contained in the report, the screening tool was reviewed to identify VMT of the traffic analysis zone (TAZ) in which the site is located.³⁰ TAZ's are geographic areas used to represent homogenous travel behavior. As stated in the VMT Regional Baseline Study report, residential projects that are within a TAZ that perform at or below the subregion threshold for home-based VMT per resident under baseline year conditions are considered low VMT areas. Projects within

³⁰ MCOG SB 743 VMT Screening Tool, https://devapps.fehrandpeers.com/MCOG_VMT_Screening/#, run June 22, 2020

a low VMT area are assumed to have a less than significant impact.³¹ The subregion VMT is 8.7 miles, whereas the TAZ VMT in which the Project site is located is 8.5 miles.³² Therefore, it can be qualitatively determined that VMT impacts of a future multi-family residential development would have a less than significant impact. Furthermore, **Mitigation Measure TRANS-1** requires that VMT for a future development proposal be evaluated based on thresholds in place at the time, including any applicable screening criteria that may apply. Based on thresholds in place at the time, a future development proposal shall incorporate TDM measures as needed to reduce potential VMT impacts. As such, it can be presumed that a future residential development facilitated by the General Plan Amendment and Rezone would have a less than significant impact due to conflict with VMT.

7.17(c) (Geometric Design Feature Hazard) Less Than Significant Impact with Mitigation: Though site-specific design is not available at this time, the TIS evaluated the future intersection of Walnut Street-Walnut Street Extension/Locust Street. Based on the design speed of 25 miles per hour, the minimum sight distance required is 150 feet. Sight distance is currently limited on the south side of the Walnut Street Extension approach due to existing overgrown vegetation. A future development proposal would be required to remove the existing vegetation to accommodate access and ensure adequate site lines are maintained. Further, **Mitigation Measure TRANS-2** requires that future development of the site include design of the Walnut Street-Walnut Street Extension/Locust Street intersection as a stop-controlled tee-intersection. With mitigation, impacts due to future development of the site facilitated by the Project introducing a hazardous design feature would be reduced to a less than significant level.

7.17(d) (Emergency Access) Less Than Significant Impact: Future development of the project site will not result in insufficient emergency access during construction or at operation. Road closures would not be anticipated, although temporary encroachment would occur during frontage improvements at the Walnut Street-Walnut Street Extension/Locust Street intersection. All roads would be expected to remain accessible during temporary construction activities and would not substantially impair emergency access.

A future development proposal will be required to demonstrate that at operation, internal emergency access is adequate including sufficient drive aisle width, and adequate turning radius to accommodate emergency vehicles, including fire truck access. Additionally, the TIS has identified the extension of Walnut Street through the Project site to the school drop-off loop southwest of the site as an Emergency Vehicle Access (EVA) route. Internal circulation of a future development proposal would be reviewed for adequacy by all applicable City departments and outside agencies including Public Works and Fire Departments. Therefore, emergency vehicle access would be adequate under a future development proposal facilitated by the General Plan Amendment and Rezone and potential impacts would be less than significant.

Mitigation Measures:

TRANS-1: As appropriate, Transportation Demand Management measures included in Appendix C of the Traffic Impact Study shall be incorporated into the design and implementation of a future project as feasible.

³¹ Senate Bill 743 Vehicle Miles Traveled Regional Baseline Study, prepared by Fehr & Peers, May 20, 2020, Page B-5

³² MCOG SB 743 VMT Screening Tool, https://devapps.fehrandpeers.com/MCOG_VMT_Screening/#, run June 22, 2020

TRANS-2: Future development of the site shall include design of the Walnut Street-Walnut Street Extension/Locust Street intersection as a stop-controlled tee-intersection. Design of the intersection shall include realignment and repaving to ensure the intersection meets industry standards, achieves a minimum site line distance of 150 feet, and precludes landscaping or signage that obstruct site lines.

6.18. Tribal Cultural Resources

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

Sources: Vision 2020 Willits General Plan Revision; General Plan EIR; and Archaeological Survey Report, prepared by Alta Archaeological Consulting, January 15, 2019.

Existing Tribal Cultural Resources Setting

Tribal Cultural Resources are defined as sites, features, places, cultural landscapes, sacred places, or objects that have cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resource (CRHR), or are included in a local register of historical resources. Additionally, a lead agency may identify a significant resource at its discretion and supported by substantial evidence, taking into account the significance of the resource to a California Native American tribe.

Alta Archaeological Consulting prepared an Archaeological Survey Report for the Project (see Cultural Resources discussion). As stated in the Report, the City of Willits contacted the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands file to determine the presence of Native American cultural resources in the Project Area. A search of the Sacred Land file did not indicate the presence of a Native American Sacred Site within or in the immediate vicinity of the Project Area.

In addition, the NAHC provided a list of Native Americans tribes with traditional lands or cultural places located within the area, which includes the Coyote Valley Band of Pomo Indians, Pinoleville Pomo Nation, and Sherwood Valley Band of Pomo Indians. Pursuant to the AB 52 consultation process, the City of Willits sent letters to the three tribes listed above on January 2, 2020 informing them of the proposed Project and providing an opportunity to request consultation. No responses requesting consultation were received by the City.

Tribal Cultural Resources Impact Discussion

6.18(a.i) (Listed or Eligible for Listing) No Impact: As stated above, a search of the Sacred Land file did not indicate the presence of a Native American Sacred Site within or in the immediate vicinity of the Project Area. Therefore, the project would have no impact on a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

6.18(a.ii) (Significant Resource) Less Than Significant Impact with Mitigation: As previously stated, the City of Willits sent formal notification to all Native American Tribes traditionally and culturally affiliated with the area. Though none of the tribes have requested formal consultation, an Archaeological Survey Report has been prepared and mitigation measures which reduce potential impacts to significant cultural and tribal cultural resources have been identified. Implementation of **Mitigation Measure TCR-1** requires compliance with procedures set forth in CUL-1 and CUL-2. As such, the proposed Project, and future physical development facilitated by the proposed Project will have a less than significant impact to tribal cultural resources.

Mitigation Measures:

TCR-1: To protect buried Tribal Cultural Resources that may be encountered during ground disturbing activities, the Project shall implement Mitigation Measures CUL-1 and CUL-2.

6.19. Utilities and Service Systems

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

Sources: Willits General Plan Vision 2020; General Plan EIR; City of Willits Sanitary Sewer Management Plan (SSMP), 2016.

Existing Utilities and Service Systems Setting

Water Supply

The City of Willits supplies its water by storing rainfall in two local reservoirs including the Morris and Centennial Dams. According to the General Plan Revision, adopted in 1992 the combined capacity of the two dams is 1,310 acre-feet. Additional potable water supply is provided by surface water from Davis Creek. Groundwater supply is pumped from the City's Park well on Commercial Street for irrigation purposes. The City's annual water demand at the time the General Plan was written was 1,190 acre-feet. It was determined that at General Plan buildout the City's water supply would be adequate to accommodate planned residential, commercial, and industrial growth.

Wastewater

The City of Willits operates its own wastewater collection system and treatment facility which serves the City of Willits as well as the Brooktrails Township, Meadowbrook Subdivision, and Sherwood Valley Rancheria. At the time of General Plan adoption, the treatment facility had dry weather capacity of 1.3 million gallons per day (mgd). Additionally, at that time usage was at approximately 0.85 mgd. As

identified in the Waste Discharge Requirements and Master Reclamation Permit for the City of Willits Wastewater Treatment Facility, the City proposed construction of a new wastewater treatment facility which has a permitted flow of up to 4.0 mgd and is anticipated to meet the projected needs through 2025.

Storm drains

Stormwater is conveyed via the City's existing stormdrain system to the wastewater treatment facility. The City's Sanitary Sewer Management Plan provides a mechanism to properly manage, operate, and maintain all parts of the sanitary sewer system including discharges of stormwater.

Solid Waste

Solid Waste of Willits provides commercial and residential collection of solid waste and recyclable materials in the City of Willits. Solid Waste of Willits collects waste and delivers it to a transfer station at 351 Franklin Avenue.

Utilities and Service Systems Impact Discussion

6.19(a,c) (Relocation/Expansion of Utilities) Less Than Significant Impact: The proposed General Plan Amendment and Rezone Project would allow residential uses onsite that are not currently permitted and could accommodate up to an additional 111 dwelling units within the City. Though the site is not currently designated for residential uses, an increase in residents in the City has been anticipated by the General Plan and would not be expected to necessitate the expansion or construction of water or wastewater treatment facilities. As previously stated, the City's existing water supply and wastewater treatment capacity is adequate to supply residential uses at General Plan buildout. Therefore, impacts related to the relocation, construction, or expansion of water and wastewater facilities would be less than significant.

Future development of the site would be required to install new storm drain infrastructure onsite to accommodate the increase in impervious surfaces. Furthermore, a future development proposal would be required to comply with NPDES permit requirements, stormwater control strategies, and LID standards, which minimize runoff from new impervious surfaces. Therefore, impacts related to the relocation, construction, or expansion of existing storm drain facilities would be less than significant.

6.19(b) (Sufficient Water Supplies) Less Than Significant Impact: Future development of the site would utilize water obtained from the existing City system to meet onsite water demands. Potable water would be accommodated via the installation of new water laterals. The introduction of new residents to the site would increase water demands relative to existing conditions. However, the increase in onsite water demand resulting from the future development of the site has been anticipated in the General Plan. Therefore, impacts due to insufficient water supplies or inadequate entitlements would be less than significant.

6.19(d,e) (Solid Waste Generation/Compliance with Solid Waste Management) Less Than Significant Impact: Future development of the site as a residential use would be expected to contribute to the generation of solid waste within the City. As a project condition of approval, future development will be required to provide written verification that the plan for solid waste and recyclables has been accepted by the City's waste hauler. As such, disposal of solid waste resulting from the Project, and future development of the site that would be facilitated by the Project would be less than significant.

Mitigation Measures: None required.

6.20. Wildfire

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

Sources: Willits General Plan Vision 2020; General Plan EIR; Bureau of Land Management; and CALFIRE.

Existing Wildfire Setting

Mendocino County, including the City of Willits are highly susceptible to fire hazards due to natural and man-made causes. Dry conditions and high winds along with human encroachment into the wildland-urban interface (WUI) presents increasing risk to human life and structures. Approximately 60% of the City is located within a fire hazard severity zone as mapped by CALFIRE (**Figure A-4 in Appendix A**). Areas designated as moderate fire hazard severity zones account for approximately 962 acres and are primarily located along the City boundary. Areas designated as high and very high fire hazard severity zones account for 81 and 17 acres, respectively, and are located north of the City at the airport, and south of the City at the Morris Dam.

In July 2018, the Mendocino Complex Fire, which was comprised of the Ranch and River fires, burned approximately 458,900 acres near Lakeport, Ukiah, and areas within the Mendocino National Forest.

Residents of Willits were exposed to the secondary effects of the wildfire, such as smoke and air pollution. Smoke generated by wildfire consists of visible and invisible emissions that contain particulate matter (soot, tar, water vapor, and minerals) and gases (carbon monoxide, carbon dioxide, nitrogen oxides). Public health impacts associated with wildfire include difficulty in breathing, odor, and reduction in visibility.

The City's 2019 Draft Safety Element states the importance of identifying wildfire vulnerabilities and the need to address them. Methods identified in the safety element include vegetation management, development restrictions in areas identified as high and very high fire hazard severity zones, and the coordination of wildfire response at the local, state, federal, and tribal levels.

As discussed in the Hazards and Hazardous Materials section of this document, the Project is located less than 200 feet from an area classified as a Moderate Fire Hazard Severity Zone in a State Responsibility Area.

Wildfire Impact Discussion

6.20(a) (Impair Emergency Plans) Less Than Significant Impact: The Project site is categorized as a Non-VHFHZ by CAL FIRE. Though the site is located within close proximity of land designated as Moderate Fire Hazard Severity Zone, there are no lands designated as Very High Fire Hazard Severity within five miles of the project site. New development will be required to comply with all fire safety standards identified in the Willits Municipal Code and is not expected to substantially impair an adopted emergency response plan or emergency evacuation plan. As such, impacts of the Project, and future development of the site would be less than significant.

6.20(b-d) (Wildfire Risk Exacerbation, Infrastructure Contributing to Wildfire Risk, Exposure to Wildfire-Related Risks) Less Than Significant Impact: The project site is relatively flat and is surrounded by existing development. Future development onsite would be built in accordance with the Willits Municipal Code and the latest California Building and Fire Code, which contains fire prevention standards for building materials, systems, and assemblies used in the exterior design and construction of new buildings. There are no factors, such as steep slopes, prevailing winds, or the installation/maintenance of new infrastructure, that would exacerbate fire risk or expose future occupants of the site to the uncontrolled spread of a wildfire, pollutant concentrations from a wildfire, post-fire slope instability, or post-fire flooding. Therefore, impacts would be less than significant.

Mitigation Measures: None required.

6.21. Mandatory Findings of Significance (Cal. Pub. Res. Code §15065)

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

b) Does the project have impacts that are individually limited, but cumulatively considerable?

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("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

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Mandatory Findings Discussion:

6.21(a) (Degrade the Environment) Less Than Significant Impact: The project is located within the City limits and potential impacts associated with development have been anticipated by the City's General Plan and analyzed in the General Plan EIR. The proposed General Plan Amendment and Rezone Project is generally consistent with the goals of the General Plan and other applicable policy documents. The proposed Project would not result in a reasonably foreseeable development that would adversely impact sensitive habitat, riparian areas, nor would the project result in significant impacts to special-status plant or wildlife species. With implementation of mitigation measures contained herein, as well as adherence to the City's uniformly applied development standards, the impacts of a future development facilitated by the General Plan Amendment and Rezone to the quality of the environment would be reduced to levels below significance. As such, the project will not degrade the quality of the environment, reduce habitat, or adversely affect cultural resources.

6.21(b) (Cumulatively Affect the Environment) Less Than Significant Impact: The CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or increase in environmental impacts. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the proposed project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (Guidelines, Section 15355(a)(b)).

This Initial Study evaluates cumulative impacts using the General Plan EIR. Development of the proposed project, in combination with past, present, and future development in the City could result

in long-term impacts to air quality, traffic, and noise. Cumulative long-term impacts from development within the City were identified and analyzed in the City's General Plan EIR.

The proposed Project and future development that would be permitted by approval of the Project is within the City's long-range plan for future development. The project will contribute to cumulative impacts identified in the City's General Plan EIR but not to a level that is cumulatively considerable. As described in **Sections 7.1 – 7.20** of this document, the proposed General Plan and Rezone Project and associated future residential development of the site could potentially result in significant impacts; however, those impacts would be reduced to less-than-significant levels with implementation of mitigation measures. The implementation of mitigation measures would ensure that development of the proposed project would not be cumulatively considerable.

6.21(c) (Substantial Adverse Effect on Humans) Less Than Significant Impact: The project has the potential to result in adverse impacts to humans due to air quality, hazards and hazardous materials, geology and soils, noise, and transportation. However, implementation of mitigation measures contained herein will ensure that the Project and future development facilitated by the Project will have less than significant environmental effect that would directly or indirectly impact human beings onsite or in the project vicinity.

7. REFERENCE DOCUMENTS

The following information sources were referenced in the preparation of this Initial Study/Mitigated Negative and are available for review online or at the City of Willits, Community Development Department, located at 111 East Commercial Street Willits, CA 95490.

7.1. Technical Appendices

- A. Figures A-1 through A-5
- B. CALEEMod Version 2016.3.2 Output, Run Date June 22, 2020
- C. Biological Resources Graphics
- D. Archaeological Survey Report, prepared by Alta Archaeological Consulting, January 15, 2019.
- E. Traffic Impact Study for the School Property Rezoning Project, prepared by W-Trans, May 14, 2020.

7.2. Other Referenced Documents

- 1. USGS: <https://edits.nationalmap.gov/markup-app>, accessed June 8, 2020
- 2. Land Classifications based on USGS Land Use and Land Cover Classification System for Use with Remote Sensor Data.
- 3. Background Document: General Air Quality Permit for New or Modified Minor Source Sawmill Facilities in Indian Country, accessed June 22, 2020.
- 4. Skunktrain.com, calendar of availability, access June 22, 2020.

5. Per the California Building Industry Association v. the BAAQMD (2015), lead agencies are not required to analyze the impact of existing ambient air quality conditions on new residents.
6. California Regional Conservation Plans, prepared by California Department of Fish and Wildlife, October, 2017, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, Accessed June 16, 2020.
7. California Energy Commission, Total System Electric Generation (2018), <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2018-total-system-electric-generation>, Accessed June 15, 2020.
8. California Energy Commission, Supply and Demand of Natural Gas in California, https://ww2.energy.ca.gov/almanac/naturalgas_data/overview.html, Accessed June 15, 2020.
9. California Energy Commission, 2017 Integrated Energy Policy Report <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2017-integrated-energy-policy-report>, Accessed June 15, 2020.
10. Sonoma Clean Power 2019 Annual Report, <https://vimeo.com/379072737>, accessed June 22, 2020.
11. California Energy Commission, Final Adopted State Alternative Fuels Plan, Adopted December 2007, <https://ww2.energy.ca.gov/2007publications/CEC-600-2007-011/CEC-600-2007-011-CMF.PDF/>, Accessed June 15, 2020.
12. City of Willits persons per household 2020 estimate: E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark
13. Senate Bill 743 Vehicle Miles Traveled Regional Baseline Study, prepared by Fehr & Peers, May 20, 2020.
14. MCOG SB 743 Screening Tool, run date June 22, 2020.
15. State Water Resources Control Board, Construction General Permit Order 2009-0009-DWQ, http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml, Accessed August 12, 2019.
16. Safe Routes to School Action Plan, 2017, Figure 3, pg. 8.
17. Division of Mine Reclamation, California Department of Conservation, Mines Online: <https://maps.conservation.ca.gov/mol/index.html>, accessed June 17, 2020.
18. United States Geological Survey, Mineral Resources Data System, <https://mrdata.usgs.gov/general/map-us.html>, accessed June 17, 2020.
19. Transportation and Construction Vibration Guidance Manual, California Department of Transportation, Sept. 2013.
20. United States Census Bureau, ACS Demographic and Housing Estimates, 2018 <https://data.census.gov/cedsci/profile?q=Willits%20city,%20California&g=1600000US0685600&tid=ACSDP5Y2018.DP05>, accessed June 17, 2020.
21. City of Willits persons per household 2020 estimate: E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark

22. <http://opr.ca.gov/ceqa/updates/sb-743/>
23. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf
24. Mendocino Council of Governments Transportation Planning Work Program FY 2019/2020, <https://www.mendocinocog.org/files/e2524d37f/OWP+FY2019-20-Final+adopted%28web%29.pdf>, accessed June 2020
25. Senate Bill 743 Vehicle Miles Traveled Regional Baseline Study, prepared by Fehr & Peers, May 20, 2020, Page B-5
26. MCOG SB 743 VMT Screening Tool, https://devapps.fehrandpeers.com/MCOG_VMT_Screening/#, run June 22, 2020