Water System Reconstruction Project

Initial Study / Proposed Mitigated Negative Declaration

August 25, 2020

Initial Study/Proposed Mitigated Negative Declaration

Mendocino Unified School District
Water System Reconstruction Project

Prepared for:

Mendocino Unified School District
44141 Little Lake Road
Mendocino, CA 95460

Prepared by:

GHD
2235 Mercury Way, Suite 150
Santa Rosa, California 95407

August 25, 2020

Table of Contents

1. Project Information 1-1
   - 1.1 Introduction and CEQA Requirements 1-1
   - 1.2 Project Background 1-1
   - 1.3 Project Location and Site Description 1-2
   - 1.4 Environmental Setting 1-2
   - 1.5 Project Description 1-3
   - 1.6 Operation and Maintenance 1-6
   - 1.7 Environmental Protection Actions Incorporated into the Project 1-6
   - 1.8 Required Agency Approvals 1-6
   - 1.9 Tribal Consultation 1-7
2. Environmental Factors Potentially Affected 2-1
3. Environmental Analysis 3-1
   - 3.1 Aesthetics 3-1
   - 3.2 Agriculture and Forest Resources 3-4
   - 3.3 Air Quality 3-5
   - 3.4 Biological Resources 3-9
   - 3.5 Cultural Resources 3-17
   - 3.6 Energy 3-20
   - 3.7 Geology and Soils 3-22
   - 3.8 Greenhouse Gas Emissions 3-25
   - 3.9 Hazards and Hazardous Materials 3-27
   - 3.10 Hydrology and Water Quality 3-32
   - 3.11 Land Use and Planning 3-36
   - 3.12 Mineral Resources 3-37
   - 3.13 Noise 3-38
   - 3.14 Population and Housing 3-41
   - 3.15 Public Services 3-42
   - 3.16 Recreation 3-43
   - 3.17 Transportation 3-44
   - 3.18 Tribal Cultural Resources 3-47
   - 3.19 Utilities and Service Systems 3-49
   - 3.20 Wildfire 3-51
   - 3.21 Mandatory Findings of Significance 3-53
4. References 4-1

5. Report Preparers 5-1
5.1 Mendocino Unified School District 5-1
5.2 GHD 5-1
5.3 Sub-consultants 5-1

Table index

Table 1. Existing vs. Proposed Water Storage Tanks 1-4

Figure index

Figure 1 Regional Location Map 1-8
Figure 2 Existing In-Service Tanks and Wells 1-9
Figure 3 Existing Treatment Building and Access Road 1-10
Figure 4 Site Plan 1-11

1. Project Information

Project Title	MUSD Water System Reconstruction Project
Lead Agency Name & Address	Mendocino Unified School District 44141 Little Lake Road Mendocino, CA 95460
Contact Person & Phone Number	Jason Morse, Superintendent Phone: (707) 937-5868 E-mail: jmorse@mcn.org
Project Location	44020 Little Lake Road, Mendocino, CA 95460
General Plan Coastal Element Land Use Designation	Public and Semi-Public Facilities
Zoning	Public Facilities (PF)

1.1 Introduction and CEQA Requirements

The Mendocino Unified School District (MUSD), serving as the California Environmental Quality Act (CEQA) Lead Agency, has prepared this Initial Study to provide the public, responsible agencies, and trustee agencies with information about the potential environmental effects of the MUSD Water System Reconstruction Project (project). The purpose of this Initial Study is to provide a basis for deciding whether to prepare an Environmental Impact Report, a Mitigated Negative Declaration or a Negative Declaration. This Initial Study has been prepared to satisfy the requirements of CEQA (Public Resources Code, Div 13, Sec 21000-21177) and the CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387). Section 15063(d) of the State CEQA Guidelines states the content requirements of an Initial Study as follows:

1. A description of the project including the location of the project;
2. An identification of the environmental setting;
3. An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
4. A discussion of the ways to mitigate the significant effects identified, if any;
5. An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and
6. The name of the person or persons who prepared or participated in the Initial Study.

1.2 Project Background

The MUSD owns, operates and maintains a potable and fire water system to serve its K-8 School, High School and District Office, as well as Friendship Park, the Community Center of Mendocino, and a number of irrigation areas affiliated with these primary consumers. A previous inspection

conducted by the State Water Resources Control Board (SWRCB) identified certain system deficiencies, and key components of the MUSD's water system infrastructure are reaching the end of their useful life.

The MUSD has prepared a *Water System Plan Report* (GHD 2020a) to address water system deficiencies and to evaluate alternatives for water sources, water storage and water treatment design. The MUSD plans to improve its potable water system operations, including meeting regulatory requirements, making system improvements to meet long-term service needs, protecting the integrity of the water system, and ensuring the health and safety of students, faculty and public who rely upon the potable water system.

The MUSD plans to deconstruct and replace two existing water storage tanks with new water storage tanks that meet current seismic design standards and provide sufficient storage capacity for the recommended operational storage and fire flows. The MUSD would also construct a new water treatment building, redevelop an existing water supply well (Well #1), reconstruct an existing well (Well #2), install and operate one new groundwater supply well, widen an existing unimproved access road, and make other site improvements such as new fencing and security gates.

1.3 Project Location and Site Description

The project site is located near the community of Mendocino in unincorporated Mendocino County (see Figure 1, Regional Location Map). The project would include improvements on portions of three MUSD-owned parcels, Assessor's Parcel Number (APN) 119-100-03, -04, and -23.

The project site is bordered by residences as well as nearby surrounding uses including Mendocino K-8 School, the MUSD office, and commercial establishments along Little Lake Road. Highway 1 and the community of Mendocino are located approximately 0.75 mile to the west of the project site.

Existing facilities at the project site include two in-service water storage tanks (one wooden tank and one steel tank), two in-service groundwater supply wells, a water treatment building, water distribution piping, maintenance building, two shallow decommissioned/abandoned water supply wells, a pump house that has been converted into a student radio transmission station, and a graded access road (see Figures 2 and 3). The MUSD's in-service wooden tank is 24 foot in diameter, 16 feet high, and provides 50,000 gallons of water storage capacity. The MUSD's in-service steel tank is 26 feet in diameter, 16 feet high, and provides 65,000 gallons of water storage capacity. The installation date for the two in-service tanks is unknown, though it is likely that the tanks were constructed during the 1970s, and do not meet current seismic design standards.

1.4 Environmental Setting

The project site is located within the Big River watershed and within a designated coastal zone subject to the Coastal Zone Management Act. The project area is underlain by groundwater basin number 1-021, the Fort Bragg Terrace Area (DWR 2019), which is not mapped by the Environmental Protection Agency (EPA) as a sole source aquifer recharge area and is not identified as an overdrafted groundwater basin. The project site is not located within a mapped 100-year or 500-year flood zone (FEMA 2017).

The local geology in the project area generally consists of a thin layer of weathered marine terrace sediments (alluvium) ranging from 10 feet to 50 feet thick overlying impermeable Franciscan bedrock.

The project area is not located within an active Alquist-Priolo earthquake fault zone and no other active or potentially active faults have been mapped within the area.

During a site visit, Douglas fir (*Pseudotsuga menziesii*) and California bay laurel (*Umbellularia californica*) were identified as the dominant tree species on the project site. Blackwood acacia (*Acacia melanoxylon*) and at least one Bishop pine (*Pinus muricata*) were also identified on-site. The understory is mostly maintained, but western sword fern (*Polystichum munitum*) and Oregon grape (*Berberis spp.*) are present in the understory. The understory is disturbed, and several invasives (pampas grass (*Cortaderia selloana*), Scotch broom (*Cytisus scoparius*), and English ivy (*Hedera helix*)) are relatively common.

The project site is located approximately 0.5 mile north of the Big River and does not contain any aquatic habitat or intersect any riparian corridors. Thus, there is no direct hydrologic connectivity between the project site and Big River.

No critical habitat has been designated for federally-listed species within the project site. The closest critical habitat to the project site is designated critical habitat for Marbled Murrelets and Northern Spotted Owls, approximately 0.5-mile north of the project site.

The project is located within the North Coast Mendocino County sub-basin of the North Coast Air Basin, which is within the jurisdiction of the Mendocino County Air Quality Management District (MCAQMD). The North Coast Mendocino County sub-basin, like the rest of Mendocino County, is designated as a non-attainment area for the State particulate matter (PM10) standard (ARB 2018). The sub-basin is in attainment for all other State standards and for all Federal criteria air pollutants (ARB 2018, U.S. EPA 2020).

The project site is accessible via a graded access road from the maintenance building off Little Lake Road. The graded access road extends to the south side of an existing treatment building and to the south side of the existing tank site. There is no direct access for motor vehicles around either tank, and the ground is generally overgrown with grass, trees and other vegetation. There are a number of large trees around the perimeter of the site and in close proximity to the tanks. The project site generally slopes to the west, and there does not appear to be a formal drainage system which leads to ponding and muddy conditions particularly during wet winter months.

1.5 Project Description

The proposed project would replace MUSD's existing water system facilities at the project site with newer facilities, including two replacement tanks, redevelopment/reconstruction of two existing groundwater supply wells, installation and operation of one new groundwater supply well, a new well treatment building, replacement of water meters, improvement of an existing access road, and other site improvements such as new fencing and security gates. These activities are based on the improvement plan (see Figure 4, Site Plan).

Deconstruction of Existing Facilities

The two existing in-service water storage tanks at the project site would be drained, removed from service, dismantled, and recycled to the extent possible. Removal of the tanks would be phased to maintain at least one tank in service at all times. Pipelines, valves, vaults, concrete pads, and other infrastructure associated with the existing tanks would also be dismantled as required. An

experienced tank demolition contractor would oversee the demolition process and ensure adherence to applicable federal, State and local regulations for worker safety and materials handling.

Safeguards would be provided for protection of personnel and the public during tank removal and construction activities, including temporary fences, warning signs, barricades, and other similar measures. The tanks would be recycled and any loose paint and debris would be collected, stored and disposed of according to local, State and federal regulations. Any asbestos-containing material requiring removal would be properly handled and disposed of according to local, State, and federal regulations. Materials with no practical reuse or that cannot be salvaged or recycled would be disposed of at a local landfill, or at an incinerator.

Installation of New Facilities

As shown in Table 1, the MUSD proposes to replace the existing water storage tanks at the site with two new, 100,000-gallon capacity each, steel or concrete tanks. The new tanks would be approximately 25 to 32 feet in diameter and approximately 20 to 25 feet in height. The new tanks would be constructed in approximately the same locations as the existing tanks that would be removed. A 10-foot wide gravel apron would be constructed around the perimeter of the proposed replacement tanks, with a drainage ditch around the gravel apron to assist drainage.

The new tanks have been sized to provide sufficient storage capacity for the recommended operational storage as well as NFPA 1142 requirements and CFC CCR Title 24, Part 9 for fire flows. The tanks would also include water level sensors, magnetic flowmeter, residual chlorine analyzer, and tank level alarms. The new tanks would be constructed using slab-on-grade foundations resting on engineered fill materials. Seismic design of the new tanks would conform to the most recent version of the California Building Code (CBC), ASCE 7-2010, ACI 318/350/372 and the AWWA D110 design standards with any local amendments. The tank would utilize flexible piping and other connections to minimize damage during a seismic event in accordance with site-specific geotechnical recommendations.

Table 1. Existing vs. Proposed Water Storage Tanks

Tank Feature	Existing Redwood Tank	Existing Steel Tank	Proposed Replacement Tanks
Material	Wood	Steel	Steel or Concrete
Storage Capacity	50,000 gallons	65,000 gallons	200,000 gallons combined
Outside Diameter	24 feet	26 feet	25 to 32 feet
Height	16 feet	16 feet	20 to 25 feet

Water Source and Well Improvements

The MUSD would redevelop one existing water supply well (Well #1) and reconstruct a second water supply well (Well #2) at the project site, including replacing power conduits and installing transducers and cables routed to the proposed new treatment building. Well redevelopment would include procedures designed to provide sand-free water and maximize well yield. Groundwater generated during redevelopment would be stored on site and used as water for dust suppression or otherwise allowed to infiltrate into on-site soils. The MUSD would also install and operate one new groundwater well at the project site, which is anticipated to be installed as a test well.

Water Treatment Building

The MUSD would construct a new approximately 450 square foot concrete masonry unit (CMU) water treatment building on the project site to house the disinfection, chemical and monitoring equipment, as well as associated piping, valves and controls. Chlorination of the storage tanks would be completed in accordance with Method 1 described in the AWWA Standard C652-22, Disinfection of Water-Storage Facilities. Sodium hypochlorite is recommended for disinfection, and would be injected via a flow-paced chemical feed pump. The injection point would be located within the treatment building, and in close proximity to the storage tank to enable satisfactory mixing.

Driveway and Security Improvements

The MUSD would improve the existing access road within the project site by widening the road to create a 15-foot wide gravel road extending from the existing maintenance building to the proposed new tanks. There would be space for four parked maintenance vehicles, two at the tank site and one at each existing well. Project plans also identify a new 7-foot high chain link security fence with barbed wiring would be constructed around the perimeter of the site, with a lockable chain link access swing gate.

1.5.1 Construction Information

The MUSD anticipates that project construction would commence in 2021 and require approximately ten months to complete. Construction activities would generally occur Monday to Friday, 8 AM to 5 PM. The project is not anticipated to require night time construction work or construction on weekends or legal holidays.

Prior to construction, the contractor would mobilize resources to a staging area within a portion of the project site. This would include transport of construction vehicles and equipment, as well as delivery and storage of construction materials. The contractor may also secure a job site trailer and portable sanitary facilities at staging areas. The staging area would also be used for temporary stockpiling of demolition waste during dismantling of the tank.

Project construction activities would include deconstruction / demolition of existing facilities, site preparation, utility trenching, and tank coating (if required), as well as truck trips to deliver / haul materials away and construction worker trips. These activities would require the use of construction equipment such as an excavator, bulldozer, backhoe, grader, concrete saws, aerial lifts, boom truck, crane, rough terrain forklift, and paving equipment. Additional equipment likely to be used would include air compressors, generator sets, and pneumatic and electric powered tools. This equipment would be staged on-site, near the proposed tank area.

The proposed site preparation activities would involve excavation and removal of soil and construction debris from the site. The project would involve approximately 400 cubic yards of excavation and grading. Most excavated material would be re-used on-site, with the balance (approximately 100 cubic yards) hauled off-site for reuse. In total, the MUSD estimates soil hauling would generate 10 haul truck trips (assuming 10 cubic yards per truck) over 5 weeks. In addition, the MUSD anticipates up to approximately 20 haul truck trips for hauling off deconstructed tank components, and an additional 40 truck deliveries for import of concrete, gravel, building materials and other supplies to the site over 6 weeks. Construction is estimated to require up to 10 workers at maximum.

The route for construction access and hauling activities would follow Highway 1 to Little Lake Road to the project site. The site access driveway would be kept clear to allow ingress and egress for construction purposes.

To ensure that the water system remains operational during construction, demolition and construction of the new tanks would be phased to maintain one tank in service at all times. If needed, a system of temporary water storage tanks may also be installed at the project site prior to demolition of an existing tank. If temporary tanks were utilized, a concrete pad would be constructed to support the temporary tanks. The temporary tanks would be secured in place with guy line anchors or anchor bolts at the base of the tanks, or similar methods.

Trees, bushes and other vegetation that would likely encroach on the tank would either be trimmed back or removed. Prior to construction, protective fencing would be installed to form a continuous barrier around individual trees and groups of trees to be retained on the project site. Pruning of select trees on the project site may also be required to provide space for construction equipment.

1.6 Operation and Maintenance

The MUSD would operate and maintain the replacement tanks and water treatment improvements in a manner similar to the existing tanks and water system. MUSD maintenance personnel would periodically visit the site as part of a routine maintenance program, which would periodically include the collection of water samples for testing, as required by the Division of Drinking Water.

Vehicle trips associated with operation and maintenance activities currently occur under existing conditions. Following construction of the replacement tank and other system components, the project would not result in the need for additional operation and maintenance-related vehicle trips. Therefore, operation of the project would not result in new daily vehicle trips on local roadways.

1.7 Environmental Protection Actions Incorporated into the Project

The following actions are included as part of the project to reduce or avoid potential adverse effects that could result from construction or operation of the project. Additional mitigation measures are presented in the following analysis sections in Chapter 3. Environmental protection actions and mitigation measures, together, will be included in a Mitigation Monitoring Program at the time that the project is considered for approval.

1.7.1 Environmental Protection Action 1 – Implement Geotechnical Design Recommendations

As part of the project design process, the MUSD will engage a California-registered Geotechnical Engineer to conduct a design-level geotechnical study for the project. The project will be designed to comply with the site-specific recommendations made in the geotechnical report. This will include design in accordance with the seismic and foundation design criteria, as well as site preparation and grading recommendations included in the report. The geotechnical recommendations will be incorporated into the final plans and specifications for the project, and will be implemented during construction.

1.8 Required Agency Approvals

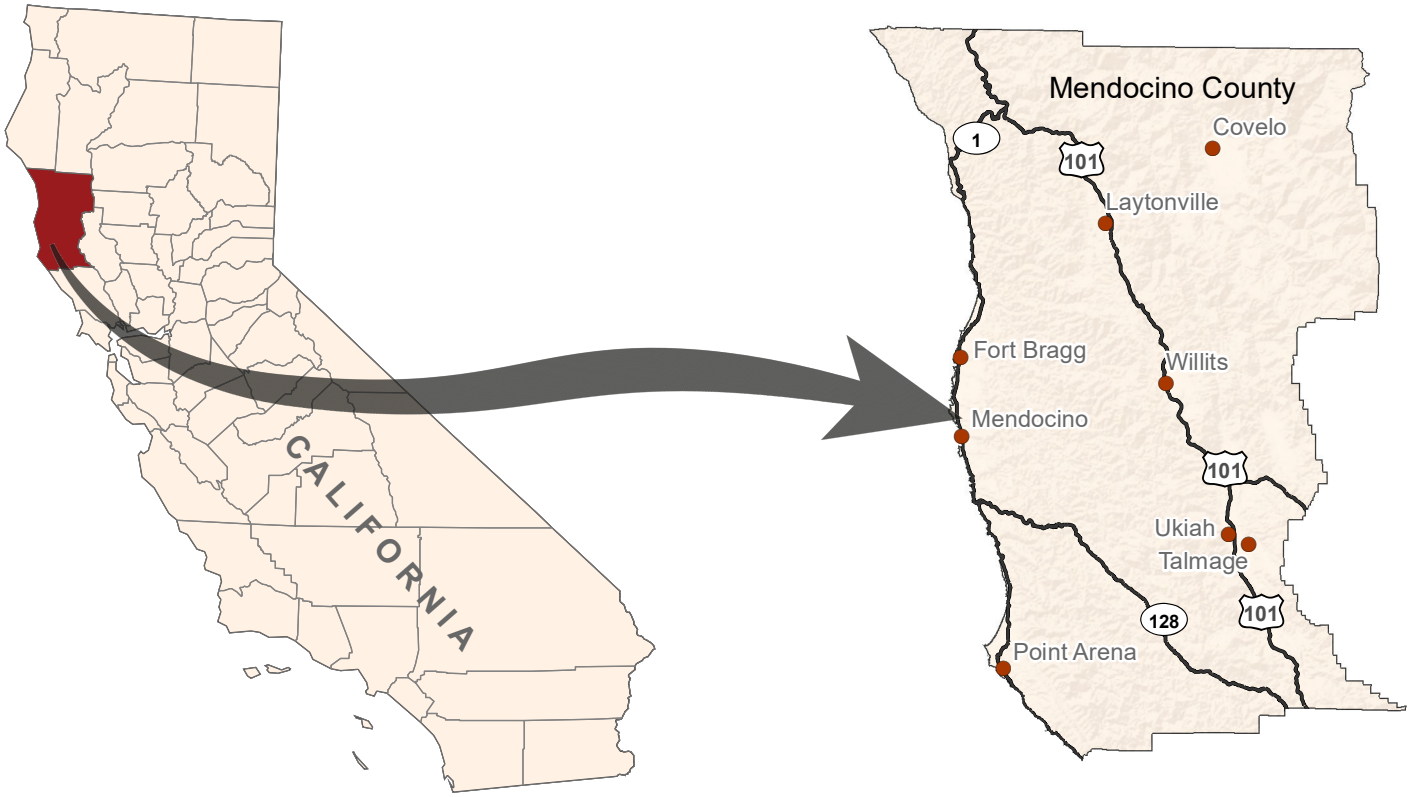
The proposed project would require the following permits and approvals.

- Project approval by MUSD Board of Trustees;
- California Department of Public Health and State Water Resources Control Board, Domestic Water Supply Permit Amendment;

- State Water Resources Control Board Division of Financial Assistance, State Revolving Fund Application and Consultations;
- Mendocino County Planning and Building Services Department, Coastal Development Permit, Building Permit, and Use Permit;
- State Water Resources Control Board, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities; and
- Mendocino County Air Quality Management District, Renovation and Demolition Notification.

1.9 Tribal Consultation

The MUSD has no record of receiving requests for notification of proposed projects from California Native American tribes pursuant to Public Resources Code Section 21080.3.1. The MUSD nevertheless initiated contact with Native American tribes as part of preparing this environmental review document. Please refer to Section 3.18, Tribal Cultural Resources, for additional information.



Paper Size ANSI A

0 1,000

Feet

Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
Grid: NAD 1983 StatePlane California II FIPS 0402 Feet

N

GHD

MUSD
Water System Reconstruction Project

Project No. **11136611**
Revision No.
Date **04/21/2020**

Regional Location Map

FIGURE 1

\\ghdnet\ghd\US\Santa Rosa\Projects\111\11136611 MUSD Grant Assistance and MP\08-GIS\CEQA\11136611_1_MUSD_Regional Map.mxd
Print date: 25 Aug 2020 - 16:22

Data source: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community
Sources: Esri, USGS, NOAA. Created by: mremillard

Existing Redwood Tank

Existing Steel Tank

Well #1 Housing

Well #2 Concrete Caisson Enclosure with Wood Lid

GHD

MUSD
Water System Reconstruction Project

Project No. **11136611**
Revision No.
Date **04/21/2020**

Existing In-service Tanks and Wells

FIGURE 2

MUSD
Water System Reconstruction Project

Existing Treatment Building and Access Road

Project No. 11136611
Revision No.
Date 04/21/2020

FIGURE 3

\\ghdnet\ghd\US\Santa Rosa\Projects\111\11136611 MUSD Grant Assistance and MP\04-Technical Work\Environmental\CEQA\Figures\InDesign\Existing Treatment Building and Access Road .indd
21 Apr 2020 - 9:56

Construct New 100K Gallon Tank

Demolish Existing Steel Tank

Future Well

(N) Security Fence around Site Perimeter

Well #2 - Repair Well Casing and Electrical Improvements

(N) Gravel Access Road

Little Lake Road

Construct New 100K Gallon Tank

Demolish Existing Redwood Tank

Demolish (E) Treatment Building

Construct (N) Treatment Building

Well #1 - Wellhead and Electrical Improvements

(N) Security Access Gate to Site

(N) Security Fence around Site Perimeter

(N) Gravel Access Road to Tank Site via Little Lake Road (15-ft wide)

(E) Maintenance Building

Little Lake Road

0 35 70
Feet

N

Tank Site Layout

Overall Site Access

Paper Size ANSI B

0 10 20 30
Feet

N

Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
Grid: NAD 1983 StatePlane California II FIPS 0402 Feet

GHD

MUSD
Water System Reconstruction Project

Site Plan

Project No. 11136611
Revision No. 2
Date 8/24/2020

Figure 4

N:\US\Santa Rosa\Projects\111\11136611 MUSD Grant Assistance and MPI\08-GIS\Maps\Deliverables\Exhibit 5 - Site Upgrades_20200824.mxd
Print date: 24 Aug 2020 - 09:08

Data source: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community. Created by: zporteous

2. 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" as indicated by the checklist on the following pages. Where checked below, the topic with a potentially significant impact will be addressed in an environmental impact report:

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

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, and a NEGATIVE DECLARATION would be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there would 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 would be prepared.

☐ I find that the proposed 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 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 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.

MUSD Signature

8/25/2020

Date

3. Environmental Analysis

3.1 Aesthetics

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			✓	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings? (Public Views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?		✓		
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✓	

a) Have a substantial adverse effect on a scenic vista? (Less than Significant)

The Mendocino County Coastal Element and the California Coastal Act seek to protect views to and along the ocean and scenic coastal areas to minimize alteration of natural land forms. The project site is located approximately 0.75 mile east of State Route 1, and is not located within a visual resource area as designated in the Mendocino County Coastal Element. The project site is not located within a designated highly scenic area or within a coastal viewshed from public areas such as roads, parks and trails. The reconstructed improvements would not block coastal views or views of ridgelines from public roadways or other vantage points. The viewshed of the project area would not substantially change as a result of the project. Therefore, impacts on a scenic vista would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (No Impact)

State Route 1 within Mendocino County is identified as eligible for official scenic highway designation (Caltrans 2020). The project site is located approximately 0.75 mile east of State Route 1, and is not visible from the highway. No impact would result.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings? (Public Views are those that are experienced from publicly accessible vantage point) (Less than Significant with Mitigation)

The project site and existing water storage tanks are visible from Little Lake Road. The project would replace two existing water storage tanks with two new larger capacity steel or concrete tanks in approximately the same location. The new water tanks would have a similar diameter as the existing tanks, but would be approximately 20 to 25 feet in height, which is approximately 4 to 9 feet taller than the existing water tanks. Additional visual changes include a widened gravel access road between an existing maintenance building and the reconstructed tanks. A new 7-foot high chain link security fence would be constructed around the perimeter of the site, with a lockable chain link access swing gate. A new approximately 450 square foot treatment building would also be constructed near the center of the project area.

As discussed in Impact "a", the project site is not located within a designated highly scenic area or within a coastal viewshed from public areas such as roads, parks and trails. The reconstructed improvements would not block views of ridgelines from public roadways or other vantage points. Trees, bushes and other vegetation that may encroach on the proposed new tanks would either be trimmed back or removed. Although Little Lake Road is not a designated scenic corridor, given the increased height of the proposed new tanks and the potential need for pruning and removal of select trees, views of the reconstructed tanks would be more prominently visible from Little Lake Road and adjacent vantage points. The potential impact on quality of public views of the site and its surroundings would be significant.

Mitigation

Mitigation Measures AES-1 and AES-2 would reduce the project impact on public views of the site and its surroundings to a less-than-significant level by minimizing tree loss, replanting trees, restoring areas disturbed during construction, and incorporating aesthetic elements into the proposed improvements.

Mitigation Measure AES-1: Minimize Tree Loss

The MUSD shall retain a certified arborist to oversee pruning techniques to minimize the potential for tree impacts and tree loss at the project site. Construction activities within the dripline of trees shall be avoided to the extent feasible during construction. Pruning of trees shall be completed by either a certified arborist or by the contractor under supervision of either an International Society of Arboriculture qualified arborist, American Society of Consulting Arborists consulting arborist, or a qualified horticulturalist. Pruning shall be completed to the minimum degree necessary to accommodate construction vehicles and in a manner that helps preserve tree health. If trees are damaged or lost, trees shall be replaced at a minimum of a 1:1 ratio. To the extent allowable, replacement trees shall be planted on-site to provide visual screening of the site from Little Lake Road and adjacent properties. The MUSD shall ensure that plantings will be monitored annually for five years after project completion to ensure that the replacement planting(s) has developed and that the trees survive.

Mitigation Measure AES-2: Minimize Visual Impacts

The MUSD shall restore or revegetate staging areas and other work areas disturbed by construction activities, including restoring pre-project topographic features and reseeding

with species comparable to those removed or disturbed during construction. To the extent feasible, the MUSD shall ensure that the proposed new tanks are of a color that would minimize visual contrast and blend in with the surrounding landscape, and that proposed fencing for the project is fitted with green slats to increase screening of tank views from Little Lake Road and adjoining properties.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Less than Significant)

Outdoor lighting on the project site would include one to two low intensity structural light poles for security and a motion-activated light on the new water treatment building. Project plans show that proposed lighting would be shielded or recessed and directed downward to reduce light spillage onto adjoining properties and public right-of-way. Because lighting would not significantly change from existing conditions and would be designed to be downcast and low intensity, the impact would be less than significant.

3.2 Agriculture and Forest Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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?				✓
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use?				✓

a-e) Convert farmland or forest land? (No Impact)

The project would not be located in lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDC 2017), or on land under a Williamson Act contract (Mendocino County 2014). The project would not be constructed on land zoned for agricultural or forestland uses and is located on land designated as urban and built-up. Thus, the project would not convert Important Farmland, land under a Williamson Act contract, or forest land to other uses, nor conflict with zoning for agricultural or forestry uses. No impact to agriculture or forestry resources would result.

3.3 Air Quality

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

Local Air Basin

The project site is located within the North Coast Mendocino County sub-basin of the North Coast Air Basin, which is within the jurisdiction of the Mendocino County Air Quality Management District (MCAQMD). The North Coast Mendocino County sub-basin, like the rest of Mendocino County, is designated as a non-attainment area for the State particulate matter (PM10) standard (ARB 2018). The sub-basin is in attainment for all other State standards and for all Federal criteria air pollutants (ARB 2018, U.S. EPA 2020).

According to the MCAQMD's Particulate Matter Attainment Plan (MCAQMD 2005), the primary man-made sources of PM10 pollution in the North Coast Air Basin are wood combustion (woodstoves, fireplaces and outdoor burning), fugitive dust, and automobile traffic. Some of the automobile emissions are the result of "pass-though" traffic on US Highway 101 because of its nature as the major transportation corridor in this part of the State.

CEQA Thresholds

On June 3, 2010, the MCAQMD Air Pollution Control Officer issued new CEQA guidance which requested that Planning agencies and consultants use the Bay Area Air Quality Management District (BAAQMD) CEQA Thresholds adopted on May 28th, 2010, to evaluate air quality impacts, with

clarifications provided in 2013 (MCAQMD 2010, MCAQMD 2013). The BAAQMD thresholds have subsequently been updated, with the last major revision completed in May 2011.

The BAAQMD CEQA Thresholds were subsequently invalidated by a trial court because the BAAQMD itself did not do a CEQA evaluation of the Thresholds before their adoption. The Court, however, did not rule on or question the adequacy of the BAAQMD Air Quality CEQA Guidelines, including the impact assessment methodologies, or the evidentiary basis supporting the Thresholds, which are included in the Guidelines. Therefore, the following air quality analysis utilizes in part the impact assessment methodologies presented in the BAAQMD Air Quality CEQA Guidelines.

a) Conflict with or obstruct implementation of the applicable air quality plan? (Less than Significant with Mitigation)

The California Clean Air Act of 1988 requires that any air district that does not meet the PM10 standard make continuing progress to attain the standard at the earliest practicable date. In response to this requirement, the MCAQMD adopted a Particulate Matter Attainment Plan in 2005 (MCAQMD 2005), which includes a description of local air quality, the sources of local PM emissions, and recommended control measures to reduce future PM levels. Control measures recommended in the Attainment Plan include measures related to woodstoves, campgrounds, unpaved roads, construction and grading activities, new residential development, and open burning emissions.

Construction activities associated with the project would include site preparation (e.g., demolition, clearing/grubbing), grading, excavation, utility trenching, and roadway widening. The types of air pollutants generated by these activities are typically nitrogen oxides and particulate matter, such as dust and exhaust. Because construction activities could temporarily increase levels of PM10 in a region designated as non-attainment for PM10, the impact is considered significant.

Mitigation

With implementation of Mitigation Measure AIR-1, construction activities would not conflict with or obstruct implementation of the 2005 Particulate Matter Attainment Plan. The impact following mitigation would be less than significant.

Mitigation Measure AIR-1: Dust Control Measures

In accordance with Rule 1-430(b) of the Mendocino County Air Quality Management District Regulations, the MUSD and its Contractor shall implement the following airborne dust control measures during construction activities:

- All visibly dry disturbed soil road surfaces shall be watered to minimize fugitive dust emissions.
- All unpaved surfaces, unless otherwise treated with suitable chemicals or oils, shall have a posted speed limit of 10 miles per hour.
- Earth or other material that has been transported by trucking or earth moving equipment, erosion by water, or other means onto paved streets shall be promptly removed.
- Asphalt, oil, water, or suitable chemicals shall be applied on materials stockpiles and other surfaces that can give rise to airborne dusts.
- All earthmoving activities shall cease when sustained winds exceed 15 miles per hour.

- The operator shall take reasonable precautions to prevent the entry of unauthorized vehicles onto the site during non-work hours.
- The operator shall keep a daily log of activities to control fugitive dust.

b) Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? (Less than Significant)

The project site is located in an area that is in attainment for all criteria air pollutants, except for PM10. By its nature, air pollution is largely a cumulative impact, in that individual projects are rarely sufficient in size to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions may contribute to cumulative adverse air quality impacts.

The BAAQMD's CEQA guidelines and thresholds, which the MCAQMD uses as CEQA guidance, includes screening criteria to provide lead agencies with a conservative indication of whether a project could result in potentially significant air quality impacts. According to the guidelines, if a project's characteristics (i.e., square footage, acreage, number of dwelling units) are less than associated screening criteria, then the lead agency does not need to perform a detailed air quality assessment of the project's air pollutant emissions and a less-than-significant impact would occur (BAAQMD 2017).

For construction activities, several different screening criterions are recommended by the BAAQMD relative to air pollutant emissions (i.e., reactive organic gases [ROG], NOX, PM2.5, and PM10). For example, detailed air quality assessments are not required for construction of projects such as single family residential developments comprised of less than 114 dwelling units, City parks that are less than 67 acres in size, and construction of office and commercial buildings that are less than 277,000 square feet (BAAQMD 2017).

The BAAQMD CEQA thresholds do not include specific screening criteria for tank replacement or infrastructure improvement projects. However, when one compares the screening criteria established for the types of projects described above, it is reasonable to assume that the extent of construction activities associated with the project would be substantially less and would also not warrant a detailed air quality assessment. The project, for example, would be conducted during one construction season (i.e., approximately ten months) and the total construction disturbance area is estimated to be approximately 0.5 acre – well below the screening criteria. Therefore, given the temporary nature of the project's construction phase and the scale of the project, it is not anticipated that construction activities would result in a cumulatively considerable net increase of PM10. The short-term impact would be less than significant. Additionally, dust control measures required by Mitigation Measure AQ-1 would further minimize fugitive dust and emissions during construction.

Following construction, the project would not result in a new stationary source of emissions and the project would not result in an increase in mobile trips to the site. Therefore, the project would not result in any new mobile pollutant emissions nor result in a cumulatively considerable increase in PM10 emissions. No long-term impact would result.

c) Expose sensitive receptors to substantial pollutant concentrations? (Less than Significant)

Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardio-respiratory diseases. Residential uses are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended

periods of time, resulting in sustained exposure to any pollutants present. The closest residential receptors are residences north and west of the project site. The two pollutants of concern for this impact are naturally occurring asbestos and diesel particulate matter.

Naturally Occurring Asbestos

Asbestos is a common name for a group of naturally occurring fibrous silicate minerals that are made up of thin, but strong, durable fibers. Asbestos is a known carcinogen and presents a public health hazard if it is present in the friable (easily crumbled) form. Naturally occurring asbestos (NOA) is most typically encountered in Franciscan ultramafic rock (primarily serpentinite) or Franciscan mélange. The MCAQMD has published mapping of areas of concern for NOA within Mendocino County. The project site is not located within an area of concern for NOA. The nearest location of concern is approximately 20 miles inland from the project site (MCAQMD 2005). Therefore, no human exposure to NOA is anticipated to occur during construction. No impact would result.

Diesel Particulate Matter

Construction equipment and heavy-duty truck traffic generate diesel particulate matter (DPM) exhaust, which is a known toxic air contaminant. DPM from equipment exhaust and $PM_{2.5}$ pose potential health impacts to nearby receptors. The majority of heavy diesel equipment usage would occur during the site clearing and demolition, and grading phases of construction. Site clearing and demolition is estimated to occur over 25 days, and grading would take an estimated 15 days. Because the limited scope and duration of the project, no prolonged or intense construction activity would occur. Project construction would result in a less than significant impact from exposure to construction-generated DPM. Following construction, project operation would not expose sensitive receptors to substantial pollutant concentrations as the project does not include any stationary source emissions or an increase in any mobile emissions. No long-term impact would result.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (No Impact)

Implementation of the project would not result in any major sources of odor. The project is not one of the common types of facilities known to produce odors (e.g., landfill, coffee roaster, wastewater treatment facility, etc.). Construction activities could result in short-term odors, such as diesel exhaust from construction equipment. Such odors would be temporary, occurring only during the construction period, and would disperse rapidly. Therefore, construction would not create objectionable odors affecting a substantial number of people. Following construction, there would be no features included in the project that would, by their nature or design, result in a new source of odors. No impact would result.

3.4 Biological Resources

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

Biological Resources Evaluation

A Biological Resources Evaluation was prepared for the project to identify special-status plant and wildlife species and sensitive habitats (including wetlands) that have the potential to occur on or in the vicinity of the project site (GHD 2020b). The assessment included literature and database searches as well as site surveys to determine what species might have potential to be present on the project site. The database searches encompassed six U.S. Geological Survey (USGS) quadrangles (quads) centered on the project area quad (Mendocino) and the surrounding five quads (Elk, Mathison Peak, Noyo Hill, Albion, and Fort Bragg). In addition, citizen

science databases such as eBird and iNaturalist were reviewed for additional local wildlife information.

A reconnaissance field survey was conducted by a GHD Senior Biologist on December 12, 2019. The survey methods were intended to identify sensitive habitat and detect wildlife activity. Where the habitat allowed the surveyor to walk without risk of damaging nests or dens and surrounding vegetation, the survey included a physical search of the area. This included inspecting the ground, shrubs, and trees for the presence of any wildlife species. Additionally, the bark of vegetation and the ground layer under vegetation were inspected for evidence of wildlife species, such as feathers, pellets, whitewash, scat, tracks, etc. Where the habitat was dense or otherwise impenetrable or inaccessible, observations were made from fixed locations. No protocol-level surveys for special status plants and wildlife, sensitive natural communities, or environmentally sensitive habitat areas were conducted at this time.

The information and data collected for the assessment have been used as the basis of this biological resources analysis.

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Less than Significant with Mitigation)

Special-status Plant Species

A reconnaissance field survey was conducted by a GHD Senior Biologist on December 12, 2019. During the site visit, the ground layer at the project site was noted as ranging from leaf litter on nearly bare dirt to dense herbaceous layer dominated by annual grasses. A few very small patches of rush and sedge were identified, although no well-defined wetland areas were observed. Small areas of shrub cover were present, and the understory was disturbed, and several invasive plant species were relatively common.

No special status plants were identified during the biological field visit completed in December 2019. However, review of literature and database searches determined that the following special status plant species have a moderate potential to occur at the project site:

- Point Reyes ceanothus (*Ceanothus gloriosus var. gloriosus*), CRPR 4.3
- Bunchberry (*Cornus canadensis*), CRPR 2B.2
- Harlequin lotus (*Hosackia gracilis*), CRPR 4.2
- Baker's goldfields (*Lasthenia californica ssp. bakeri*), CRPR 1B.2
- Leafy-stemmed mitrewort (*Mitellastra caulescens*), CRPR 4.2
- Seacoast ragwort (*Packera bolanderi var. bolanderi*), CRPR 2B.2
- California pinefoot (*Pityopus californicus*), CRPR 4.2
- Maple-leaved checkerbloom (*Sidalcea malachroides*), CRPR 4.2
- Siskiyou checkerbloom (*Sidalcea malviflora ssp. patula*), CRPR 1B.2
- Bolander's reed grass (*Calamagrostis bolanderi*), CRPR 4.2
- California sedge (*Carex californica*), CRPR 2B.2
- Nodding semaphore grass (*Pleuropogon refractus*), CRPR 4.2

- Fringed false-hellebore (*Veratrum fimbriatum*), CRPR 2B.2
- Angel's hair lichen (*Ramalina thrausta*), CRPR 2B.1
- Usnea longissima (*Methuselah's beard lichen*), CRPR 4.2

Although no special status plants were observed at the project site during a reconnaissance level site visit, the blooming period for the plants listed above as having a moderate potential to occur is generally in the spring. Because of the proximity of the project area to known populations of the above listed special status plant species, the impact of the project is considered potentially significant. Implementation of Mitigation Measure BIO-1 would reduce the impact of the project on special-status plants to a less-than-significant level by requiring pre-construction surveys by qualified biologists prior to work in applicable habitats, as well as a minimum level of compensation for loss of any habitat for special-status plant.

Special-status Wildlife Species

Northern Red-legged Frog (*Rana aurora*), California State Species of Special Concern

Northern red-legged frogs are relatively common in and near coastal portions of Mendocino County and records have documented the species within three miles of the project site on private timberlands and in Big River State Park (CDFW 2020). This species has a moderate likelihood of periodically occurring within the project area as they could occasionally forage on or disperse through the area if a suitable breeding wetland is present nearby (CDFW 2020). In the event this species were to disperse onto the project site, vegetation removal and ground disturbance may result in potentially adverse effects to the species. The potential impact is considered significant. Implementation of Mitigation Measures BIO-2 and BIO-3 would ensure no direct effects (mortality/take) of Northern red-legged frogs would occur and thereby reduce impacts to a less-than-significant level.

Townsend's Big-eared Bat (*Corynorhinus townsendii)*, California State Species of Special Concern

Townsend's Big-eared Bats are medium-sized bats, distinguished from other co-occurring bat species by their large ears and a two-pronged horseshoe-shaped lump on the muzzle. Townsends' Big-eared Bats are typically associated with coastal redwood forests, foothill oak woodlands, inland deserts, pinyon-juniper and pine forests, and mixed coniferous-deciduous forests. The species roosts colonially in a variety of structures including hollow trees, buildings (barns), mines, and lava tubes. Forests near the project site may serve as hibernacula for this species and requisite roosting and foraging habitat is present in the 6-quad search area. The closest known occurrence record is from 2016 along the side of Highway 1, about 0.5 road miles north of Little River and 1.8 miles south of the town of Mendocino (CDFW 2020). Foraging habitat for the species could be present in the project site. Therefore, Townsend's Big-eared Bats have a moderate likelihood of occurring within the project site, and vegetation and structure removal and ground disturbance may result in potentially adverse effects to the species if present. The potential impact is considered significant. Implementation of Mitigation Measure BIO-4 would reduce potential impacts to special status bats to a less-than-significant level.

Passerines and Raptors

Birds and raptors are protected under the federal Migratory Bird Treaty Act (50 CFR 10.13), and their nest, eggs, and young are also protected under the California Fish and Wildlife Code (§3503, §3503.5, and §3513). Marbled murrelet (*Brachyramphus marmoratus*) is a federally and state threatened species with several known occurrences recorded within Russian Gulch State Park, over 1 mile north of the project area (CDFW 2020). Murrelets favor old-growth coniferous forests < 50

miles from the coast. Trees with a diameter at breast height greater than 19 inches are preferred for nesting (81 FR 51348). Stand size is also an important feature for nest site selection with stands greater than 500 acres preferred in California (57 FR 45328). The project site is in a residential area without old-growth forest characteristics preferred by this species. Therefore, the project would have no effect on the species.

The Northern spotted owl (*Strix occidentalis caurina*) is a federally and state threatened species with recorded occurrences from 2015 and 2016 less than 0.65 miles south of the project site (CDFW 2020). The preferred habitat type of the Northern spotted owl consists of old growth forests with moderate to high canopy closure, a multi-species canopy with large over-story trees, large trees with numerous decadent features (i.e. broken tops, cavities, and snags), and a significant amount of open space beneath the canopy (USFWS 2008). No nesting habitat (e.g., mature contiguous coniferous forest) for this species exists in the project area. Therefore, the project will have no effect on this species.

The white-tailed Kite (*Elanus leucurus*) is a California Fully Protected Species which has been recently recorded throughout the town of Mendocino within 0.5 mile of the project site. The osprey (*Pandion haliaetus*) is a California State Watch List (Nesting) species with numerous recent occurrence records along the Big River and throughout the town of Mendocino, within 0.5 mile of the project site. The purple Martin (*Progne subis*) is a California Species of Special Concern with a recorded occurrence in 2018 on Big River near West Haul Road, within 0.5 mile of the project site. Based on historical records and available habitat, the three above-mentioned species have a moderate potential to occur within the project site, and vegetation removal and ground disturbance may result in potentially adverse effects to the species if present. The potential impact is considered significant. Implementation of Mitigation Measure BIO-5 would reduce the impact to nesting birds to a less-than-significant level.

Sonoma Tree Vole (*Arborimus pomo*), California State Species of Special Concern

Sonoma Tree Voles are primarily arboreal mammals that occur in coniferous forest habitat. Sonoma Tree Voles usually occur within the fog belt of northern California from Sonoma County to the Oregon border, and diet on needles of Douglas fir (*Pseudotsuga menziesii*) and grand fir (*Abies grandis*). Based on the location of the project, the presence of Douglas fir trees onsite, and numerous historical records documenting species presence in the project area, the Sonoma Tree Vole has a moderate likelihood of occurring, and vegetation removal and ground disturbance may result in potentially adverse effects to the species if present. The potential impact is considered significant. Implementation of Mitigation Measure BIO-3 would ensure no direct effects no direct effects (mortality/take) of Sonoma tree vole would occur and thereby reduce impacts to a less-than-significant level.

Mitigation

Mitigation Measures BIO-1 through BIO-5 would reduce the project impact on special-status plants and wildlife to less-than-significant levels by requiring pre-construction surveys by qualified biologists prior to work in applicable habitats, and measures to avoid take of species as well as a minimum level of compensation for loss of habitat for special-status plant and wildlife species.

Mitigation Measure BIO-1: Avoid Loss of Sensitive Plant Species

The MUSD shall retain a qualified biologist to complete appropriate pre-construction surveys for special status plant species prior to construction within the planned area of disturbance for the project, during the appropriate blooming time (spring or summer) for the target species. Survey methods shall comply with CDFW rare plant survey protocols,

and shall be performed by a qualified field botanist. Surveys shall be modified to include detection of juvenile (pre-flowering) colonies of perennial species when necessary. Any populations of special status plant species that are detected shall be mapped. Populations (if present) shall be flagged if avoidance is feasible and if populations are located adjacent to construction areas. The locations of any special status plant populations to be avoided shall be clearly identified in the contract documents (plans and specifications).

If avoidance is not feasible, a Special Status Plant Management Plan shall be prepared and implemented in coordination with CDFW, in which recommendations shall be provided as to the feasibility of relocating the plants or collecting seeds prior to the start of construction. The report shall identify similar habitat on nearby lands to accommodate both relocation and seed spreading. If seed collection is determined to be the more appropriate method for the specified species, seeds shall either be collected and spread on- or off-site, or provided to a local native plant nursery for propagation then planting. For both relocating or seed collection, the MUSD shall indicate an on- or off-site location for relocation, establish success criteria, identify monitoring protocol of the site for one to two seasons, and determine appropriate action if the success criteria is not met.

Mitigation Measure BIO-2: Standard Construction Measures for Protecting Biological Resources

Steep-sided excavations capable of trapping mammals would be ramped or covered if left overnight. No poisons or other potentially injurious materials attractive to mammals shall be utilized or left unattended during construction or operation activities.

Mitigation Measure BIO-3: Protect Northern Red Legged Frog and Sonoma Tree Voles

In the event that a Northern red-legged frog is observed in an active construction zone, the contractor shall halt construction activities in the immediate area where observed and the frog shall be moved to a safe location in similar habitat outside of the construction zone. The construction impact area shall also be surveyed by a qualified biologist within seven days prior to the start of construction for any tree nests indicative of Sonoma tree voles. If any active Sonoma tree vole nests are found, the nest shall be avoided during construction activities.

Mitigation Measure BIO-4: Protect Bat Species

If construction occurs during the bat maternity season (generally May 1st through August 30th), a qualified bat biologist shall conduct habitat surveys for special status bats. Survey methodology should include visual examination of suitable habitat areas for signs of bat use and may optionally utilize ultrasonic detectors to determine if special status bat species utilize the vicinity. Surveys shall be conducted within seven days prior to construction in any areas where potential maternity roosts may be disturbed/removed. Surveys shall be conducted by a qualified biologist. Surveys shall include a visual inspection of the impact area and any large trees/snags with cavities or loose bark. If the presence of a maternity roost is confirmed, roost removal will be prohibited during maternity season and no activity generating significant noise shall occur within 300 feet of the roost. If no bat utilization or roosts are found, then no further study or action is required. If bats are found to utilize the project area, or presence is assumed, a bat specialist should be engaged to advise the best method to prevent impact.

Mitigation Measure BIO-5: Prevent Disturbance to Nesting Birds

Ground disturbance and vegetation clearing shall be conducted, if possible, during the fall and/or winter months and outside of the avian nesting season (March 15 – August 15) to avoid any direct effects to special status and protected birds. If ground disturbance cannot be confined to work outside of the nesting season, a qualified ornithologist shall conduct pre-construction surveys within the vicinity of the project area, to check for nesting activity of native birds and to evaluate the site for presence of raptors and special status bird species. The ornithologist shall conduct at minimum a one day pre-construction survey within the 7-day period prior to vegetation removal and ground-disturbing activities. If ground disturbance and vegetation removal work lapses for seven days or longer during the breeding season, a qualified ornithologist shall conduct a supplemental avian pre-construction survey before project work is reinitiated.

If active nests are detected within the construction footprint or up to 500 feet from construction activities, the ornithologist shall flag a buffer around each nest (assuming property access). Construction activities shall avoid nest sites until the ornithologist determines that the young have fledged or nesting activity has ceased. If nests are documented outside of the construction (disturbance) footprint, but within 500 feet of the construction area, buffers will be implemented as needed (buffer size dependent on species). In general, the buffer size for common species would be determined on a case-by-case basis in consultation with the CDFW and, if applicable, with USFWS. Buffer sizes will take into account factors such as (1) noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity; (2) distance and amount of vegetation or other screening between the construction site and the nest; and (3) sensitivity of individual nesting species and behaviors of the nesting birds.

If active nests are detected during the survey, the qualified ornithologist shall monitor all nests at least once per week to determine whether birds are being disturbed. Activities that might, in the opinion of the qualified ornithologist, disturb nesting activities (e.g., excessive noise), shall be prohibited within the buffer zone until such a determination is made. If signs of disturbance or distress are observed, the qualified ornithologist shall immediately implement adaptive measures to reduce disturbance. These measures may include, but are not limited to, increasing buffer size, halting disruptive construction activities in the vicinity of the nest until fledging is confirmed or nesting activity has ceased, placement of visual screens or sound dampening structures between the nest and construction activity, reducing speed limits, replacing and updating noisy equipment, queuing trucks to distribute idling noise, locating vehicle access points and loading and shipping facilities away from noise-sensitive receptors, reducing the number of noisy construction activities occurring simultaneously, and/or reorienting and/or relocating construction equipment to minimize noise at noise-sensitive receptors.

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 Game or US Fish and Wildlife Service? (No Impact)

The project site is located approximately 0.5 mile north of the Big River and does not contain any riparian or aquatic habitat or intersect any riparian corridors. Thus, there is no direct hydrologic connectivity between the project site and Big River and no direct or indirect effect on riparian habitat

would result. A stand of Mendocino pygmy cypress forest and grand fir forest is mapped within 1,500 feet and one mile of the project site boundary, respectively, however, these natural communities were not observed on the project site. No impact would result.

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? (No Impact)

Searches of the National Wetland Inventory (NWI) were conducted on December 18, 2019 and March 18, 2020 for the immediate project vicinity and revealed no known federal jurisdictional wetlands or waters within the project area (NWI 2020). In addition, no wetland areas were observed on the project site during the biological reconnaissance field survey conducted on December 12, 2019. No impact to wetlands would result.

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? (Less than Significant)

The project site is located approximately 0.5 mile north of the Big River and does not contain any riparian or aquatic habitat or intersect any riparian corridors. There is no direct hydrologic connectivity between the project site and Big River or other perennial waterbodies, waterways or drainages. Therefore, no impact on movement of any native resident or migratory fish or essential fish habitat would result.

Figure 4.4-7 of the Mendocino County General Plan EIR identifies major wildlife corridors in the County. The project site is not located within a mapped major wildlife movement corridor, and the project site is currently developed with existing facilities which the MUSD proposes to reconstruct within substantially the same footprint. No continuous barriers to terrestrial wildlife movement are anticipated, and the project would not substantially interfere with migratory birds, bats, or aquatic species. The impact would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Less than Significant with Mitigation)

No tree preservation policy or ordinance is applicable to the project site. The Mendocino County General Plan and Coastal Element contain numerous policies and action items to protect biological resources. General Plan Policy RM-28 requires that all discretionary public and private projects that identify special-status species in a biological resources evaluation (where natural conditions of the site suggest the potential presence of special-status species) shall avoid impacts to special-status species and their habitat to the maximum extent feasible. Where impacts cannot be avoided, Policy RM-28 states that projects shall include the implementation of site-specific or project-specific effective mitigation strategies developed by a qualified professional in consultation with State or federal resource agencies with jurisdiction (if applicable). Implementation of mitigation measures listed in impact 3.4 (a) above would reduce project-related impacts to special-status species to a less-than-significant level. Therefore, within implementation, no conflicts with local policies or ordinances protecting biological resources have been identified.

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? (No Impact)

The Mendocino County Coastal Conservation Plan, adopted in 2003, includes goals and strategies to protect and restore natural communities, working landscapes, and scenic viewsheds within coastal watersheds and coastal terraces. The project site is currently developed with existing facilities which the MUSD proposes to reconstruct within substantially the same footprint. The project would not obstruct implementation of the Mendocino County Coastal Conservation Plan, and no conflicts with the Conservation Plan have been identified. No impact would result.

3.5 Cultural Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?				✓
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		✓		
c) Disturb any human remains, including those interred outside of formal cemeteries?			✓	

Archaeological Resources Study

An Archaeological Resources Study was prepared for the project by the Anthropological Studies Center of Sonoma State University (ASC 2020). The study assessed the potential for surficial and/or buried archaeological and historical resources in the proposed improvement area through the completion of the following:

- Records and literature search at the Northwest Information Center (NWIC) of the California Historical Resources Information Center (CHRIS);
- Further literature review of publications, files, and maps for ethnographic, historic-era, and prehistoric resources and background information;
- Communication with the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File and contact information for the appropriate tribal communities;
- Contact with the appropriate local Native American Tribes; and
- Pedestrian archaeological survey of the project area.

Study results were used as a technical basis for evaluating potential impacts to historic and cultural resources under CEQA.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (No Impact)

The existing water system facilities at the project site are not included on the California Department of Parks and Recreation's California Inventory of Historic Resources, or the State of California Office of Historic Preservation Historic Properties Directory and Built Environment Resource Directory. The facilities are not listed in, or determined eligible for listing in the National Register of Historic Places or California Register of Historic Resources. The installation date for the two in-service tanks and the wooden water treatment building is unknown, though it is likely that the tanks were constructed during the 1970s and are less than 50 years old. No information has become available to indicate that the existing tanks and water treatment building would be eligible under any of the established criteria. Therefore, removal of the two existing tanks and the water treatment building would not impact a historic resource. No impact would result.

The potential for historic-period archaeological resources are evaluated in impact "b" below.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (Less than Significant with Mitigation)

The Archaeological Resources Study conducted for the project found no previously recorded cultural resources located within the proposed improvement area. A pedestrian archaeological survey of the project site also identified no archaeological resources. Background research indicates a moderate sensitivity for prehistoric and historic-era archaeological resources on the surface (ASC 2020). The sensitivity for buried prehistoric archaeological resources in the improvement area is considered low (ASC 2020). The search of the NAHC's Sacred Lands File for Sacred Sites in the project area was positive, however, no information suggesting the presence of sacred sites or archaeological resources was received from individuals or organizations contacted as part of the study. Such coordination included letters, faxes, and telephone calls to Native American contacts provided by the NAHC. Although no known archaeological resources were identified within the project area, the potential exists for encountering previously undiscovered archaeological resources during project construction. Therefore, the impact is considered potentially significant.

Mitigation

Implementation of Mitigation Measure CR-1 would reduce the potential impact to previously undiscovered archaeological or tribal cultural resources to a less-than-significant level by outlining procedures to be taken in the event of inadvertent discovery of unrecorded resources consistent with appropriate laws and requirements.

Mitigation Measure CR-1: Minimize Impacts to Unknown Archaeological or Tribal Cultural Resources

In the event that any subsurface archaeological features or deposits, including locally darkened midden soil, are discovered during construction-related earth-moving activities, all ground-disturbing activity in the vicinity of the resource shall be halted, a qualified professional archaeologist shall be retained to evaluate the find, and the appropriate tribal representative(s) shall be notified. If the find qualifies as a historical resource, unique archaeological resource, or tribal cultural resource as defined by CEQA, the archaeologist shall develop appropriate measures to protect the integrity of the resource and ensure that no additional resources are affected. In considering any suggested measures proposed by the consulting archaeologist in order to mitigate impacts to historical resources or unique archaeological resources, the MUSD shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project while mitigation for unique archaeological resources is being carried out.

c) Disturb any human remains, including those interred outside of formal cemeteries? (Less than Significant)

No human remains are known to exist within the project area. However, there is potential for earthwork and grading to result in the disturbance of previously unrecorded human remains, if present. Therefore, the impact is considered potentially significant.

No human remains are known to exist within the project area. Excavation and earthmoving activities would occur within previously disturbed areas that are primarily underlain by engineered soils and/or fill. Because project excavations would be shallow and would occur in previously disturbed soils, the

sensitivity of the project area for buried human remains is considered to be low. In the event of inadvertent discovery of human remains, as required by law, the MUSD would be required to follow procedures outlined in Public Resources Code § 5097.9 and Health and Safety Code § 7050.5, which outline standard procedures to be taken in the event of inadvertent discovery. The impact would be less than significant.

3.6 Energy

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			✓	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				✓

a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Less than Significant)

Construction of the project would involve grading, excavation and temporary use of heavy machinery. Construction would require the use of fuels, primarily gas, diesel, and motor oil. The precise amount of construction-related energy consumption that would occur is uncertain. However, construction would not require a large amount of fuel or energy usage because of the moderate number of construction vehicles and equipment, worker trips, and truck trips that would be required for a project of this scale. Use of fuels would not be wasteful or unnecessary because their use is necessary to complete the project. Excessive idling and other inefficient site operations would be prohibited. Equipment idling times would be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes or less (as required by the California airborne toxics control measure (Title 13, Section 2485 of the CCR). Therefore, construction would not result in the use of large amounts of fuel and energy in a wasteful manner, and the impact would be less than significant.

Following construction, energy consumption on the site would be limited to the electricity needed to continue operating the existing water system. The project would utilize a third groundwater supply well and associated submersible pump. However, the overall water demand is not expected to increase as a result of this project, and the total amount of electricity utilized by all well pumps on site would not substantially increase. Fuel consumption would be limited to that utilized by routine maintenance workers as they traveled to and from the site. No increase in operation and maintenance related trips would occur. The operational impact would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (No Impact)

In 2003, the California Energy Commission (CEC), the California Power Authority (CPA), and the California Public Utilities Commission (CPUC) jointly adopted an Energy Action Plan (EAP) that listed goals for California's energy future and set forth a commitment to achieve these goals through specific actions (CEC 2003). In 2005, the CPUC and the CEC jointly prepared the EAP II to identify the further actions necessary to meet California's future energy needs. Additionally, the CEC prepared the State Alternative Fuels Plan in partnership with the California Air Resources Board and in consultation with

the other state, federal, and local agencies. The alternative fuels 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 (CEC 2007).

Locally, the *Mendocino County General Plan* includes goals to promote energy conservation in the County and to increase use of renewable energy resources (Goal RM-9).

Construction and operation of the project would not conflict with or obstruct implementation of either the EAP, EAP II, the State Alternative Fuels Plan or local County general plan goals. Project construction would not require a large amount of fuel or energy usage because of the limited extent and nature of the proposed improvements and the minimal number of construction vehicles and equipment, worker trips, and truck trips that would be required for a project of this small scale. Project operation would not result in a significant change in the level of energy consumption because water demand and maintenance needs will not increase. No conflicts with a state or local plan for renewable energy or energy efficiency have been identified. Therefore, no impact would result.

3.7 Geology and Soils

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

a, i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (No Impact)

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures designed for human occupancy. In accordance with this act, the State Geologist

established regulatory zones, called “earthquake fault zones,” around the surface traces of active faults and published maps showing these zones. Within these zones, buildings for human occupancy cannot be constructed across the surface trace of active faults. Title 14 of the California Code of Regulations (CCR), Section 3601(e), defines buildings intended for human occupancy as those that would be inhabited for more than 2,000 hours per year.

The project site is not located within a designated Alquist-Priolo Earthquake Fault Zone, and no other active or potentially active faults have been mapped passing through the project site. Additionally, the project does not include structures intended for human occupancy. The project would not change the exposure of people or structures to risk of loss, injury, or death from fault rupture. No impact would result.

a, ii) Strong seismic ground shaking? (Less than Significant)

The nearest active faults are the Maacama Fault, located approximately 25 miles to the east, and the San Andreas Fault, located approximately 20 miles to the south. Future strong seismic ground shaking is, therefore, anticipated at the project site.

By applying geotechnical evaluation techniques and appropriate engineering practices, potential injury and damage from seismic activity can be diminished, thereby exposing fewer people and less property to the effects of a major damaging earthquake. The design and construction of new structures are subject to engineering standards of the California Building Code, which take into account soil properties, seismic shaking and foundation type. As described in Section 1.5, Project Description, the seismic design of the new tanks would conform to the most current version of the California Building Code (CBC) and design standards with any local amendments. The tank would utilize flexible piping and other connections to minimize damage during a seismic event in accordance with site-specific geotechnical recommendations. In addition, as described in Section 1.7, “Environmental Protection Actions Incorporated into the Project,” the project would be designed and constructed in conformance with the site-specific recommendations contained in a design-level geotechnical study report to be completed for the project and any subsequent project-related geotechnical reports. Because the project would be constructed in accordance with the applicable design standards and with the project-specific recommendations contained in a design-level geotechnical study, the impact related to strong seismic ground shaking would be less than significant.

a.iii, a.iv, c, d) Seismic-related Ground Failure, Liquefaction, Landslides, or otherwise Unstable Soils? (Less than Significant)

The project would replace existing water storage facilities, including two tanks and a treatment building in approximately the same location. Excavation and earthmoving activities would be relatively shallow and would occur within previously disturbed areas that are primarily underlain by engineered soils and/or fill beneath the existing facilities. Mapping of liquefaction susceptibility in Mendocino County indicates that the project site is located in an area where soils are susceptible to liquefaction (County of Mendocino, 2008). Liquefiable and otherwise unstable soils may be encountered at the project site.

By applying geotechnical evaluation techniques and appropriate engineering practices, potential injury and damage from seismic activity and unstable soils can be diminished, thereby exposing fewer people and less property to the effects of a major damaging earthquake. The design and construction of new structures are subject to engineering standards of the CBC, which take into account soil properties and foundation type. As described in Section 1.7, Environmental Protection Actions

Incorporated into the Project, the project would be designed and constructed in conformance with the site-specific recommendations contained in a design-level geotechnical study report to be completed for the project and any subsequent project-related geotechnical reports, which would include ground improvement and pipe bedding and backfill criteria. Because the project would be constructed in accordance with the applicable design standards and with the project-specific recommendations contained in a design-level geotechnical study, the impact related to strong seismic ground shaking and unstable soils would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil? (Less than Significant)

Construction activities would involve minor grading for the improved gravel access road and foundation-related excavations for the reconstructed tanks and treatment building. Areas to be disturbed during construction would consist predominantly of previously disturbed and underlying soils that have been highly altered from their original, natural state. As a result, the project would result in little disturbance to native soils. Following construction, the project site would be redeveloped and areas of exposed soil vulnerable to erosion would not be present. The overall impact related to soil erosion or loss of topsoil would be less than significant.

Refer to Section 3.10, Hydrology and Water Quality, for a discussion of construction impacts to water quality associated with soil erosion.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (No Impact)

The project would not involve the use of septic tanks or other alternative wastewater disposal systems. No impact would result.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Less than Significant)

The proposed improvements would not require modification of any unique geologic features. Excavation and earthmoving activities would occur within previously disturbed areas that are primarily underlain by engineered soils and/or fill. Because project excavations would be shallow and would occur in previously disturbed soils, the sensitivity of the project area for buried paleontological resources is considered to be low. Excavation depths would not occur to depths where paleontological resources would be likely encountered, and the project would be required to follow procedures outlined in Public Resources Code § 5097.5 in the event of inadvertent discovery of paleontological resources. The impact would be less than significant.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				✓

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Less than Significant)

There is currently no applicable federal, State, or local threshold pertaining to construction-related greenhouse gas (GHG) emissions, and the BAAQMD CEQA Guidelines [used by the Mendocino County Air Quality Management District] do not include screening criteria or significance thresholds for construction. Therefore, this analysis uses a qualitative approach in accordance with Section 15064.4(a)(2) of the CEQA Guidelines.

Construction activities would result in a temporary (approximately 10 months) increase in GHG emissions, including exhaust emissions from on-road haul trucks, worker commute vehicles, and off-road heavy duty equipment. Project emissions during construction would not be a considerable contribution to the cumulative GHG impact, given that construction would be temporary and would require standard clearing, earthmoving, hauling, and delivery equipment, as used for similar projects, and which have been accounted for in the State's emission inventory and reduction strategy outlined in the California Air Resources Board (CARB) Climate Scoping Plan (see discussion below). The impact from construction GHG emissions would be less than significant.

Following construction, the project would not result in a new source of GHG emissions. The project would not result in an increase in vehicle trips because operations and maintenance activities will not increase from the pre-project baseline. Therefore, no long-term impact to GHG emissions would result.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (No Impact)

In 2008, the CARB adopted the Climate Scoping Plan, which outlined measures to attain emissions standards pursuant to AB 32. The most recent update to the Scoping Plan was completed in December 2017. Although the Scoping Plan identifies strategies to meet statewide emissions reductions targets, it does not contain recommended reduction levels or percentages for local government's municipal operations.

The County of Mendocino has adopted several GHG emission reduction policies and action items as part of the 2009 General Plan (County of Mendocino 2009). General Plan Action Item DE-65.2 directs the County to work cooperatively with industrial facilities to identify greenhouse gas impacts from their operations and develop a long-term plan for reducing emissions. Because the project is not a type of industrial development, Action Item DE-65.2 would not apply to the project.

Mendocino County General Plan Policy RM-43 and Action Items RM-43.1 through RM-43.3 direct the County to create an inventory of existing and historical GHG emissions, to create a GHG reduction plan, and to reduce the County's GHG footprint. As of the date this analysis was completed, the County had not completed such an inventory and had not developed a GHG reduction plan. In addition, the MCAQMD has not developed CEQA guidelines or significance thresholds for use in GHG analyses. Therefore, for the purpose of this analysis, the 2017 Scoping Plan was used as the evaluation criteria.

The recommended measures in the 2017 Scoping Plan are broad policy and regulatory initiatives that will be implemented at the State level and do not relate to the construction and operation of individual infrastructure projects, such as the MUSD Water System Reconstruction Project. Although project construction may benefit (have a reduced generation of GHG) from implementation of some of the State-level regulations and policies related to fuel and vehicle efficiencies, the project would not impede the State in meeting the AB 32 greenhouse gas reduction goals. No conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases have been identified. Therefore, no impact would result.

3.9 Hazards and Hazardous Materials

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

a, b) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or upset and accident conditions? (Less than Significant with Mitigation)

The project would include reconstruction of two existing in-service water storage tanks, which would be drained, removed from service, dismantled, and recycled to the extent possible. The existing tanks may potentially contain lead-based paint, and project soils and sands located beneath the tanks may

contain elevated levels of hydrocarbons and lead. If present, such materials would be classified as California non-RCRA hazardous waste requiring disposal at a landfill facility that is permitted to accept such waste. Demolition of the tanks and excavation of potentially contaminated soil could expose workers and potentially adjacent residential areas to airborne emissions of lead. The impact is considered significant. Implementation of Mitigation Measure HAZ-1 would reduce the impact to a less-than-significant level by requiring the MUSD and its contractor to develop and implement a waste management and disposal plan for the existing tanks and soils to ensure proper safety during the handling, transport, and disposal of the waste.

Construction activities would also involve the use of hazardous materials such as fuels, lubricants, paints and solvents. Routine transport of hazardous materials to and from the project site during construction could result in an incremental increase in the potential for accidents. However, numerous laws and regulations ensure the safe transportation, use, storage and disposal of hazardous materials. For example, the California Department of Transportation and the California Highway Patrol regulate the transportation of hazardous materials and wastes, including container types and packaging requirements, as well as licensing and training for truck operators, chemical handlers, and hazardous waste haulers. Worker safety regulations cover hazards related to the prevention of exposure to hazardous materials and a release to the environment from hazardous materials use. The California Division of Occupational Safety and Health (Cal-OSHA) also enforces hazard communication program regulations, which contain worker safety training and hazard information requirements, such as procedures for identifying and labeling hazardous substances, communicating hazard information related to hazardous substances and their handling, and preparation of health and safety plans to protect workers and employees. Because contractors would be required to comply with existing and future hazardous materials laws and regulations covering the transport, use and disposal of hazardous materials, the project's construction-related impact would be less than significant.

Following construction, operation of the project would not result in the need for new hazardous materials that would need to be transported, used, or disposed. No operational impact would occur.

Mitigation

Implementation of Mitigation Measure HAZ-1 would reduce the impact to a less-than-significant level by requiring the MUSD and its contractor to develop and implement a waste management and disposal plan for the existing tanks and soils to ensure proper safety during the handling, transport, and disposal of the waste.

Mitigation Measure HAZ-1: Waste Management and Disposal

The MUSD and/or its Contractor shall, prior to the start of construction activities, develop and then implement a waste management and disposal plan to control and prevent releases of lead paint and lead-laden soil during construction activities that could pose a risk to human health and the environment. At a minimum, the plan shall specify that the existing tanks be dismantled without removing the paint on the tanks. During dismantling, handling, and transporting the tank to the disposal facility, the tank surface shall be stabilized by wrapping and securing the tank pieces in plastic sheeting or coating the outer tank surface with a stabilizer compound to mitigate the potential for friable paint to flake off during transport. The management and disposal of the tank debris shall be conducted in accordance with the off-site facility receiving the dismantled tanks. If the paint is to be removed from the tanks prior to tank removal, TCLP leaching tests shall be performed to determine if the paint is RCRA hazardous waste.

The plan shall specify proper soil management and handling protocols that shall be implemented to minimize airborne dust and protect construction workers and neighboring residents from exposure to hazardous material emissions during tank deconstruction and soil excavation/grading activities. The plan shall identify and implement protocols to protect workers from exposure to chemicals above the applicable federal and state Occupational Safety and Health Administration's (OSHA) Permissible Exposure Limits (PELs), such as the use of personal protective equipment requirements, worker decontamination procedures, and air monitoring strategies to ensure that workers are adequately protected.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Less than Significant)

The project site is located approximately 0.15 mile east-northeast of Mendocino K-8 School. Construction activities would include the use of materials such as fuels, lubricants, paints, and solvents, which are commonly used during construction, are not acutely hazardous, and would be used in small quantities. Numerous laws and regulations ensure the safe transportation, use, storage, and disposal of hazardous materials (see Impact "a" and "b" above). Although construction activities could result in the inadvertent release of small quantities of hazardous construction chemicals, a spill or release would not be expected to endanger individuals at Mendocino K-8 School given the nature of the materials and the small quantities that would be used. Therefore, because the MUSD and its contractors would be required to comply with existing and future hazardous materials laws and regulations covering the transport, use, and disposal of hazardous materials, and because of the nature and quantity of the hazardous materials to be potentially used by the project, the impact related to the use of hazardous materials during construction within one-quarter mile of a school would be less than significant.

Following construction, the project would not include a new stationary source of hazardous emissions or handling of acutely hazardous materials or waste. No operational impact would result.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Less than Significant)

The provisions in Government Code Section 65962.5 are commonly referred to as the "Cortese List." A search of the Cortese List was completed to determine if any known hazardous waste sites have been recorded on or adjacent to the project site, including review of:

- Department of Toxic Substances Control EnviroStor database;
- List of Leaking Underground Storage Tank Sites from the Water Board GeoTracker database;
- List of solid waste disposal sites identified by the Water Board with waste constituents above hazardous waste levels;
- List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the Water Board; and
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.

The project site was not identified on or adjacent to any parcels on lists compiled by the California Environmental Protection Agency, Regional Water Quality Control Board, California Department of Toxic Substances Control, or the CalRecycle Waste Management Board Solid Development Waste

Information System. The nearest such site was a former hazardous materials investigation and cleanup that occurred on the MUSD office and bus barn. An investigation of that site was conducted related to a former diesel fuel release, and case closure was granted in 2011 in compliance with the Health and Safety Code. The impact would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (No Impact)

The project site is not located within the Mendocino County Airport Comprehensive Land Use Plan or within two miles of a public use airport. The nearest airport, Little River Airport, is located approximately 3.5 miles south of the project site. No impact would result.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (No Impact)

The project would not impair or physically interfere with implementation of Mendocino County's adopted emergency operations plan. The project would not change existing circulation patterns, would not generate new traffic, and would not affect emergency response routes. No impact would result.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Less than Significant with Mitigation)

The Mendocino County Multi-Hazard Mitigation Plan analyzes the probability of wildland fires within the County (Mendocino County 2014). Based on the California Fire and Resource Assessment Program fuel rank model, the project site and the majority of Mendocino County is susceptible to wildland fires. It is possible that fire ignition could occur during construction (e.g. related to heavy machinery usage). Given the vegetation at the project site and the proximity of nearby residences, the construction-related impact is considered significant.

Following construction, the project would not result in changes to growth patterns or residential densities. The project site is not located within a mapped wildland-urban interface area. The use of the property would be substantially the same as the existing site. The operational impact of the project would be less than significant.

Mitigation

Implementation of Mitigation Measure HAZ-2 would require the use of construction techniques that would reduce the likelihood of wildland fires during construction of the project. Therefore, with implementation of Mitigation Measure HAZ-2, the impact related to wildland fires would be less than significant.

Mitigation Measure HAZ-2: Reduce Wildland Fire Hazards During Construction

Prior to construction, the MUSD and its contractor(s) shall remove and/or clear away dry, combustible vegetation from the construction site. Grass and other vegetation less than 18 inches in height above the ground shall be maintained where necessary to stabilize the soil and prevent erosion. Vehicles shall not be parked in areas where exhaust systems contact combustible materials. Fire extinguishers shall be available on the construction site to

assist in quickly extinguishing any small fires. The contractors shall have on site the phone number for the local fire department(s).

3.10 Hydrology and Water Quality

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

a, c.i) Violate any water quality standards or waste discharge requirements, otherwise substantially degrade surface or ground water quality, or result in substantial erosion or siltation on- or off-site? (Less than Significant with Mitigation)

The project site is located approximately half a mile north of the Big River and does not contain any on-site aquatic drainages. Thus, there is no direct hydrologic connectivity between the project site and Big River or other perennial waterbodies, waterways or drainages. However, construction activities have the potential to degrade water quality as a result of erosion caused by earthmoving activities during construction or the accidental release of hazardous construction chemicals. If not

properly managed, construction activities could result in erosion, as well the discharge of chemicals and materials, such as concrete, mortar, asphalt, fuels, and lubricants. Applicable water quality standards and waste discharge requirements could be violated, and polluted runoff could substantially degrade water quality. The impact is considered significant.

Following construction, operation and maintenance of the proposed replacement water storage tanks would not require planned discharges to the local storm drain system. No operational impact would result.

Mitigation

Implementation of Mitigation Measure HWQ-1 would reduce potential impacts relative to water quality standards and waste discharge requirements from construction activities to a less-than-significant level by requiring implementation of best management practices and compliance with applicable State and local requirements.

Mitigation Measure HWQ-1: Implement Storm Water Control Measures during Construction

The MUSD and its contractor shall implement appropriate Best Management Practices to prevent the discharge of construction waste, debris or contaminants. Best Management Practices may include, but would not be limited to, the following:

- Existing vegetation on the construction site shall be maintained to the maximum extent feasible.
- Areas of disturbed soil shall be reseeded and covered with vegetation as soon as possible after disturbance.
- Erosion control devices shall be installed in coordination with clearing, grubbing, and grading. Such devices shall include perimeter sediment controls (perimeter silt fence, fiber rolls), stabilized construction exits, stockpile management, wind erosion control, and sediment basins if needed to retain sediment on site.
- BMPs shall be implemented to prevent the release of hazardous construction chemicals during construction. Such BMPs shall include material handling and waste management, material stockpile management, management of any washout areas, control of vehicle/equipment fueling to contractor's staging area , vehicle and equipment cleaning performed off site, and spill prevention and control.
- If more than one acre of land would be disturbed, the MUSD shall obtain coverage under State Water Resources Control Board Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities, as amended by Order No. 2012-0006. The MUSD shall comply with all provisions of the permit, including development and implementation of a Storm Water Pollution Prevention Plan.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (Less than Significant)

The project site is located within the Fort Bragg Terrace Area Groundwater Basin (Basin 1-021), which is not mapped by the EPA as a sole source aquifer recharge area and is not identified as an overdrafted groundwater basin. The project would include operation of a new groundwater supply

well and redevelopment/reconstruction of two existing groundwater supply wells. After redevelopment/reconstruction, the two existing water supply wells would become more efficient and the new water supply well and water tanks would provide for greater redundancy and storage capacity. The MUSD's water demand has been relatively stable between 2008 and 2018, and irrigation water use has been declining since 2015 due to increased use of recycled water as well as drought and water restrictions. The MUSD does not foresee substantial population growth in its school population in future years. Therefore, while the project would increase the ability of MUSD to pump and store groundwater, the project would not result in an actual increase in water consumption or pumping that would substantially decrease groundwater supplies or drawdown groundwater levels such that the project would impede sustainable groundwater management of the local sub-basin or well interference. The impact would be less than significant.

The new water tanks would be constructed in approximately the same location as the existing tanks that would be replaced. The project would not result in a substantial increase the amount of impervious surface at the site compared to existing conditions, and would not interfere substantially with groundwater recharge at the project site. The impact would be less than significant.

c, ii-iv) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? 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? Impede or redirect flood flows? (Less than Significant)

The project site is located approximately half a mile north of the Big River and does not contain any on-site streams. As such, implementation of the project would not require alteration of a creek or other waterbody. The new water tanks would be constructed in approximately the same location as the existing tanks that would be replaced. The project would not result in a substantial increase the amount of impervious surface at the site compared to existing conditions. The new gravel aprons around the water tanks would be permeable. Operation of the project would not result in a new point discharge of storm water runoff. The potential for the project to increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or exceed the capacity of existing or planned stormwater drainage systems, would be less than significant.

The project site is not located within a 100-year flood hazard area or within a floodway or other special flood hazard zone. Therefore, implementation of the project would not impede or redirect flood flows.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (No Impact)

The project site is located in an area designated by the FEMA as Zone X, which is an area of minimal flood hazard (FEMA 2017). The project site is not located within a tsunami inundation zone as mapped by the California Office of Emergency Services (Cal OES 2009), nor close enough to a waterbody which would be exposed to risks from seiche. Therefore, implementation of the project would not risk release of pollutants due to project inundation. No impact would result.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (No impact)

The North Coast Regional Water Quality Control Board Basin Plan establishes thresholds for key water resource protection objectives for both surface waters and groundwater. The project is not located near a stream or river and would not alter water quality parameters established in the Basin Plan. Erosion control BMPs would be required to be implemented during construction to prevent erosion and to protect overall water quality. The project is located within a low priority groundwater basin (No. 1-021). Therefore, the project would not obstruct implementation of a sustainable groundwater management plan. As described in impact "b" above, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge or impede sustainable groundwater management. No conflicts with a water quality control plan or sustainable groundwater management plan have been identified. Therefore, no impact would result.

3.11 Land Use and Planning

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				✓
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?		✓		

a) Physically divide an established community? (No Impact)

The project would include replacing several of the MUSD's existing water system facilities within the confines of the existing tank site. The project does not include new features that would divide an established community. No impact would result.

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? (Less than Significant with Mitigation)

The project would consist of improvements on MUSD property currently developed with water system infrastructure. The project site is currently developed with existing facilities, and the reconstructed facilities would be located within substantially the same footprint on an approximately 0.5 acre portion of the project site. The project is located within the Mendocino County Coastal Element and the land use designation for the three project parcels is Public and Semi-Public Facility. The zoning designation for the project parcels is Public Facilities (PF). The project would not involve a change of land use on the affected property. Specific policies and regulations adopted for the purpose of avoiding or mitigating environmental effects are evaluated in this document under the corresponding issue areas. With implementation of the recommended mitigation measures identified in this IS/MND, the project would not conflict with land use plans, policies, or regulations.

3.12 Mineral Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓

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. (No Impact)

The project site is not located in an area designated as a Mineral Resource Zone (MRZ)-2 by the Surface Mining and Reclamation Act, i.e., areas where there is a high likelihood of significant mineral deposits. Therefore, the project would not result in the loss of known mineral resources of value to the region or state. No impact would result.

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? (No Impact)

The most predominant of the minerals found in Mendocino County are aggregate resource minerals, primarily sand and gravel, found along many rivers and streams. Although aggregate hard rock quarry mines are found throughout the county, there are no locally important aggregate or mineral resources on or in the vicinity of the project site (Mendocino County 2008). No impact on the availability of locally-important mineral resources would result.

3.13 Noise

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✓	
b) Result in generation of excessive groundborne vibration or noise levels?			✓	
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?				✓

a) Result in 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? (Less than Significant)

The County of Mendocino has not established quantified construction noise limits or allowable construction hours. Noise impacts resulting from construction 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 lasts over extended periods of time, such as more than one year. In comparison, project construction would commence in 2021 and require approximately ten months to complete. Construction activities would generally occur Monday to Friday, 8 AM to 5 PM. The project would not require night time construction work or construction on weekends or legal holidays. Impact pile driving is not anticipated as a method of construction. Construction activities would be temporary in nature and would not exceed established noise standards for public health and safety. The construction-related impact would be less than significant.

Mendocino County General Plan policy DE-98 and DE-99 protect residential areas and other noise-sensitive uses from excessive noise. This policies regulate the establishment of new land uses, stating that no new use regulated by the County shall be permitted to generate noise that would cause the ambient noise on any adjacent parcel to exceed guidelines shown in Policy DE-100 and DE-101. General Plan policy DE-105 also establishes a 5 decibel increase in CNEL or Ldn noise levels as a significance threshold. In comparison, the project would not involve new, noise sensitive land uses and would not expose persons to noise levels that exceed the noise standards. The project site is surrounded by single-family homes on the north, east, and west sides. To the south the project site is bounded by Little Lake Road, across which lie additional single family homes. The homes are built on large (1-2 acre) lots and are heavily forested. These homes represent sensitive noise receptors in the vicinity of the facility. Homes nearest to the facility range in proximity from 100 to 175 feet from the project area. Operational noise associated with a new well would not result in a new substantial noise source as the well pump would be installed underground near the bottom of the well and would be encased in a housing structure. There would be no change in existing traffic-generated noise in the project area and project operation would not result in increased noise levels comparative to existing conditions that could conflict with general plan policies. The operational impact would be less than significant.

b) Result in generation of excessive groundborne vibration or noise levels? (Less than Significant)

Vibration is the movement of particles within a medium or object such as the ground or a building. Groundborne vibrations may be described by amplitude and frequency. Vibration amplitudes are typically expressed in peak particle velocity (PPV) in inches per second (in/sec). PPV represents the maximum instantaneous positive or negative peak of a vibration signal and is most appropriate for evaluating the potential for building damage. Human response to groundborne vibration is subjective and varies from person to person. For structural damage, the California Department of Transportation recommends a vibration limit of 0.5 in/sec PPV for buildings structurally sound and designed to modern engineering standards. The age of nearby residences is unknown; however, based on development patterns and building architecture (i.e. relatively modern structures with perimeter foundations) they appear to have been constructed in the 1960's or 1970's. Therefore, ground borne vibration levels exceeding 0.5 in/sec PPV would have the potential to result in a significant vibration impact.

Project construction would require the use of construction equipment such as an excavator, bulldozer, backhoe, grader, concrete saws, aerial lifts, boom truck, crane, rough terrain forklift, paving equipment. Construction would not require the use of a pile driver. Vibration levels from typical construction activities would be expected to be 0.2 in/sec PPV or less at a distance of 25 feet. These vibration levels from project construction would be below the 0.5 in/sec PPV significance threshold used to assess potential cosmetic damage to buildings that are structurally sound. Vibration generated by construction activities may at times be perceptible, but would be infrequent and only occur during the daytime. Therefore, impacts related to ground borne vibration or ground borne noise levels would be less than significant.

Following construction, operation of the project would not result in substantial sources of ground borne vibration or ground borne noise. Therefore, no operational impact would result.

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? (No Impact)

The project site is not located within an airport land use plan, within two miles of a public airport, or within the vicinity of an active private airstrip (Mendocino County Airport Land Use Commission 1996). No impact from air-traffic related noise would result.

3.14 Population and Housing

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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)?			✓	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✓

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)? (Less than Significant)

The project would include replacing MUSD's existing water system facilities at the project site with newer facilities, including two replacement tanks, redevelopment/reconstruction of two existing groundwater supply wells, operation of one new groundwater supply well, a new well treatment building, widening of an existing unimproved access road, and other site improvements such as fencing and security gates. The project is intended to provide adequate capacity to meet the current maximum day demand for MUSD's water system, particularly during periods of drought, and to replace major components of the system that are approaching the end of their useful life and to ensure that the system meets current health, safety and environmental standards. The increase in tank storage capacity from 115,000 gallons to 200,000 gallons would provide sufficient operational storage capacity and the capacity to meet NFPA 1142 requirements and CFC CCR Title 24, Part 9 requirements for fire flows. The project does not involve the construction of any housing and would not induce population growth directly or indirectly. The project would not extend infrastructure or roads into areas that have not previously been accessible or developed. The impact would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (No Impact)

No housing or people would be displaced by the project and no replacement housing would be required. No impact would result.

3.15 Public Services

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) 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:				
Fire Protection?				✓
Police protection?				✓
Schools?				✓
Parks?				✓
Other public facilities?				✓

a) 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 public services? (No Impact)

The project would not generate new demand for public services, and water service would be uninterrupted during project construction. Although tank reconstruction would temporarily reduce fire flow capacity during the construction period, the project would result in a long-term benefit to fire flows by improving the overall efficiency and reliability of MUSD's water system. Implementation of the project would increase water storage capacity for fire flows pursuant to NFPA 1142 requirements as well as CFC CCR Title 23, Part 9.

As discussed in Section 3.14, Population and Housing, implementation of the project would not induce population growth and, therefore, would not require expanded fire or police protection facilities to maintain acceptable service ratios, response times, or other performance objectives. The project would not result in an increase in student population, and therefore, no new or expanded schools would be required. The project would not result in the increased use of existing parks and other public facilities as it would not induce population growth. The project would not require the expansion of recreational facilities to maintain acceptable service ratios in parks, and would not require the expansion of other public facilities. No impact on public services would result.

3.16 Recreation

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✓
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?				✓

a, b) 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, or include or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (No Impact)

The project would not increase the use of recreational facilities or create new demand for construction or expansion of recreational facilities. No impact would result.

3.17 Transportation

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

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (No Impact)

Construction of the project would result in a short-term increase in vehicle trips on local roadways, including SR 1 and Little Lake Road. As discussed in the Project Description of this Initial Study, the MUSD estimates soil hauling would generate 10 haul truck trips over 5 weeks. In addition, the MUSD anticipates up to approximately 20 haul truck trips for hauling off deconstructed tank components, and an additional 40 truck deliveries for import of concrete, gravel, building materials and other supplies to the site over 6 weeks. Construction is estimated to require up to 10 workers at maximum.

The addition of construction-related traffic would occur during daytime hours between 8:00 a.m. and 5:00 p.m. and would not substantially affect congestion on local roadway segments because trips would occur at differing periods of the day and would represent a small percentage of the capacity of the roadways. Construction would not require installation of water distribution lines within or other utility improvements within Little Lake Road or other public right of way, and no transit routes, stops, sidewalks or bicycle lanes are provided along Little Lake Road adjacent to the project site. Following construction, the project would not result in an increase in vehicle trips because operations and maintenance activities would not change from the pre-project baseline. The proposed improvements would not represent an increase in the intensity of the use taking place on site, and would not require additional staffing or maintenance visits. No conflicts with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities have been identified. Therefore, no impact would result.

See impact "c" below for a discussion of potential impacts relative to traffic hazards during construction.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (No Impact)

In November 2017, the Governor's Office of Planning and Research (OPR) released a technical advisory containing recommendations regarding the assessment of vehicle miles travelled (VMT). VMT refers to the amount and distance of automobile travel attributable to a project. As noted in the OPR guidelines, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT. The change to VMT was formally adopted as part of updates to the CEQA Guidelines on December 28, 2018. The current deadline for adopting policies to implement SB 743 and the provisions of CEQA Guidelines section 15064.3(b) is July 1, 2020. At the time of report preparation, the County of Mendocino is in the process of adopting VMT policies but has not yet completed the process. Until the County does, there is no guidance on how to evaluate the proposed project in terms of VMT. Therefore, the project would not conflict with or be inconsistent with an applicable threshold of significance adopted per CEQA Guidelines section 15064.3, subdivision (b). No impact would result.

For the purposes of evaluation, consideration was given to the project's potential to increase VMT over conditions without the project. As a utility reconstruction project, the project would not result in an increase in vehicle trips or VMT because operations and maintenance activities would not change from the pre-project baseline. The proposed improvements would not represent an increase in the intensity of the use taking place on site, and would not require additional staffing or maintenance visits. The project is not a land use project or a transportation project and would not induce population growth in the area. No impact would result.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Less than Significant with Mitigation)

During construction, construction vehicles would travel along Little Lake Road and turn left into the project site from an existing driveway to the project site. The presence of construction vehicles on Little Lake Road during construction would temporarily increase the normal traffic hazard in the project area. Therefore, the construction-related impact is considered significant.

Following construction, the project would not alter the existing alignment of Little Lake Road nor would it modify the location or design of the existing driveway connection. Operations and maintenance activities would not change from the pre-project baseline. No operational impact would result.

Mitigation

Implementation of Mitigation Measure TR-1 would reduce potential impacts relative to traffic hazards during construction to a less-than-significant level by requiring implementation of traffic controls.

Mitigation Measure TR-1: Implement Traffic Controls During Construction

Prior to the start of construction, the MUSD and/or its contractor shall prepare and implement a construction traffic control plan. Traffic controls shall include, but not necessarily be limited to, the following:

- Maintain the existing driveway to the project site, keeping it open and in good, safe condition at all times with adequate turning radii for construction vehicles.
- Provide signage along Little Lake Road in advance of the project site to warn of construction vehicles entering and existing the roadway.

- Provide immediate access of emergency vehicles through the construction area at all times.
- Prohibit on-street parking or staging of equipment during construction.

d) Result in inadequate emergency access? (Less than Significant)

The Mendocino Volunteer Fire Department provides emergency response within the project area. The nearest fire station to the project site is located at 44700 Little Lake Road, approximately 0.6 miles to the east of the project site. The project would not alter the existing street network or change emergency vehicle access to the project site or surrounding land uses. No roadway closures would occur during construction or operation of the project. The project would not result in on-street worker parking or equipment staging or otherwise affect emergency services or response times in the area. The impact would be less than significant.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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,				
i) Listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k)?		✓		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.		✓		

a,i, a.ii) Cause a substantial adverse change in the significance of a tribal cultural resource? (Less than Significant with Mitigation)

CEQA requires lead agencies to determine if a project would have a significant effect on tribal cultural resources. The CEQA Guidelines define tribal cultural resources as: (1) a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or eligible for listing on the California Register of Historical Resources, or on a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant according to the historical register criteria in Public Resources Code Section 5024.1(c), and considering the significance of the resource to a California Native American tribe.

The MUSD has no record of receiving requests for notification of proposed projects from California Native American tribes pursuant to Public Resources Code Section 21080.3.1. The MUSD nevertheless initiated contact with Native American tribes as part of preparing this environmental review document. Efforts to identify tribal cultural resources that could be affected by the project included a records search at the Northwest Information Center, literature review, a sacred lands

search through the Native American Heritage Commission (NAHC), contact with appropriate local Native American Tribes, and a pedestrian archaeological survey of the project site.

ASC contacted the NAHC on May 4, 2020, requesting a review of the Sacred Lands File for information on Native American cultural resources in the project area. On May 7, 2020, the NAHC responded with a list of groups and individuals who may be able to provide information on potential cultural resources. The NAHC also responded that the search of the Sacred Lands File was positive indicating the potential presence of a Sacred Site in the project vicinity. On May 8, 2020, ASC sent letters to the individuals listed by the NAHC requesting additional information.

On May 18, 2020, Chairperson Gabaldon was additionally contacted via email informing him of the Sacred Site identified by the NAHC in the project area. A follow up email was sent to Chairperson Gabaldon on June 11, 2020, and a phone call was placed on June 25, 2020. No response has been received by Chairperson Gabaldon as of the date of this Initial Study.

On May 26, 2020, a response was received from Mary Camp, Tribal Administrator for the Redwood Valley Tribe, indicating that the Redwood Valley Tribe supports all concerns and comments from the Manchester-Point Arena Tribe and Sherwood Valley Tribe. However, no comments have been received from the Manchester-Point Arena Tribe or Sherwood Valley Tribe. No other responses have been received to date.

As summarized in Section 3.4, Cultural Resources, background research indicates a moderate sensitivity for prehistoric and historic-era archaeological resources on the surface (ASC 2020). The sensitivity for buried prehistoric archaeological resources in the improvement area is considered low (ASC 2020). The search of the NAHC's Sacred Lands File for Sacred Sites in the project area was positive, however, no information suggesting the presence of sacred sites or tribal cultural resources was received from individuals or organizations contacted as part of the study. Although no known archaeological resources were identified within the project area, the potential exists for encountering previously undiscovered resources during project construction. Therefore, if tribal cultural resources are encountered during construction, a potentially significant impact could occur.

Mitigation

Implementation of Mitigation Measure CR-1, as described in Section 3.4, Cultural Resources, would reduce the potential impact to previously undiscovered archaeological or tribal cultural resources to a less-than-significant level by outlining procedures to be taken in the event of inadvertent discovery of unrecorded resources consistent with appropriate laws and requirements.

3.19 Utilities and Service Systems

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

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Less than Significant)

The project would include replacing several existing MUSD water system facilities at the project site with newer facilities, including reconstruction of two water supply tanks, redevelopment/reconstruction of two existing groundwater supply wells, operation of one new groundwater supply well, a new well treatment building, widening of an existing unimproved access road, and other site improvements such as fencing and security gates. The potential environmental impacts associated with construction of the proposed water system improvements are evaluated as part of this Initial Study. No utility relocation or construction of off-site utilities beyond those identified in the project description and evaluated in this Initial Study would be required that would cause environmental effects. The project would not require new or expanded storm water drainage, electrical power, natural gas, or telecommunications facilities. The project would not generate wastewater that would require treatment. The impact would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (No Impact)

The project would improve water storage capacity at an existing MUSD water system facility. The project would not create new demand for water and does not require new or expanded water entitlements. The project is intended to provide adequate capacity to meet the current maximum day demand for MUSD's water system, particularly during periods of drought, and to replace major components of the system that are approaching the end of their useful life and to ensure that the system meets current health, safety and environmental standards. The increase in tank storage capacity from 115,000 gallons to 200,000 gallons would provide sufficient operational storage capacity and the capacity to meet NFPA 1142 requirements and CFC CCR Title 24, Part 9 requirements for fire flows. No impact would result.

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? (No Impact)

As described above under impact "a" above, the project would not generate wastewater that would require treatment. Therefore, the project would not impair the ability of the regional wastewater treatment facility to continue serving existing commitments. No impact would result.

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? (Less than Significant)

Demolition debris and excavated soil would require disposal at an off-site location. The MUSD estimates that the project would involve approximately 100 cubic yards of soil that would be hauled off-site for reuse, and approximately 20 haul truck trips for hauling off deconstructed tank components. Construction waste with no practical reuse or that cannot be salvaged or recycled would be disposed of at a local transfer station or solid waste facility. The MUSD would dispose of these materials at an appropriate landfill facility and, as described in Section 3.9, Hazards and Hazardous Materials, would ensure the removal of these materials do not pose a risk to human health and the environment. Solid waste generated by the project would represent a very small fraction of the daily permitted tonnage of disposal facilities and would be sufficiently accommodated by existing landfills. The construction-related impact would be less than significant. Following construction, project operation would not generate additional solid waste or otherwise impair the attainment of solid waste reduction goals. No operational impact would result.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (No Impact)

No applicable federal solid waste regulations would apply to the project. At the State level, the Integrated Waste Management Act mandates a reduction of waste being disposed and establishes an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. The project would not conflict with or impede implementation of such programs. Following construction, project operation would not generate additional solid waste. No impact would result.

3.20 Wildfire

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	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?			✓	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?		✓		
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✓
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slop instability, or drainage changes?			✓	

a) Substantially impair an adopted emergency response plan or emergency evacuation plan? (Less than Significant)

The project site is located in a State Responsibility Area (Mendocino Fire Safe 2019) and within a moderate fire hazard severity zone (CalFire 2007). Although tank reconstruction would temporarily reduce fire flow capacity during the construction period, the project would result in a long-term benefit to fire flows by improving the overall efficiency and reliability of MUSD's water system. As discussed in Section 3.17, Transportation, the Mendocino Volunteer Fire Department provides emergency response within the project area. The nearest fire station to the project site is located on Little Lake Road, approximately 0.6 miles to the east of the project site. The project would not alter the existing street network or change emergency vehicle access to the project site or surrounding land uses. Construction would not require installation of water distribution lines or other utility improvements within Little Lake Road. No roadway closures would occur during construction or operation of the project. The project would not result in on-street worker parking or equipment staging or otherwise affect emergency services or response times in the area. The project would not substantially impair an adopted emergency response plan or emergency evacuation plan. The impact would be less than significant.

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? (Less than Significant with Mitigation)

The project site and the majority of Mendocino County is susceptible to wildland fires. As discussed in Section 3.9, Hazards and Hazardous Materials, it is possible that fire ignition could occur during construction (e.g. related to heavy machinery usage). Given the vegetation at the project site and the proximity of nearby residences, the construction-related impact is considered significant.

Following construction, the project would not alter site topography in a manner that exacerbates wildlife risk or exposure of the public to pollutants in the event of an uncontrolled wildlife. No new chemicals or hazardous materials would be used operationally such that the increase of pollutant exposure in the event of an uncontrolled wildfire would not increase above existing conditions. The operational impact of the project would be less than significant.

Mitigation

Implementation of Mitigation Measure HAZ-2, as described in Section 3.9, Hazards and Hazardous Materials, would reduce the potential impact of construction activities on wildland fires to a less-than-significant level by requiring the use of construction techniques that minimize fire risk.

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? (No Impact)

An existing unimproved access road would be widened as part of the project to improve circulation within the project site. The project would not require any additional roads, fuel breaks, emergency water sources, power lines or other utilities. Operation and maintenance activities currently occur under existing conditions and, following construction, the project would not result in the need for additional operation and maintenance activities. Therefore, the project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. No impact would result.

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? (Less than Significant)

The project site is located in low-lying and generally flat uplands east of the community of Mendocino, within one mile of the Pacific Ocean. Trees and vegetation are present in the project area, but no streams or drainages are present on or near the project site. Because the project is located in an upland environment away from a stream or similar waterway, risk of downslope flooding or landslides associated with post-fire slope instability or changes in drainage is low. The impact would be less than significant.

3.21 Mandatory Findings of Significance

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

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Less than Significant with Mitigation)

Potential project impacts to biological and cultural resources are addressed in Section 3.4, Biological Resources and Section 3.5, Cultural Resources, respectively. With implementation of the recommended mitigation measures identified in this IS/MND, the potential for project-related activities to degrade the quality of the environment, including wildlife species or their habitat, plant or animal communities, or important examples of California history or prehistory would be reduced to less-than-significant levels.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? (Less than Significant)

Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355). Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Efforts to identify cumulative projects included contact with the MUSD, the Mendocino County Planning Department, and review of Planning Department web portals. Response from the Mendocino County Planning Department on January 21, 2020 indicated two recent use permits had been issued in 2018 related to the MUSD high school, one of which was associated with water infrastructure. Given the high school is located nearly two miles west of the project site and the authorized use was minor and compliant with Mendocino County regulations, no cumulative impact would result related to the two projects.

One other project identified and considered for cumulative impacts is a planned MUSD recycled water system expansion project that would reduce potable water demand. The project is currently in a pre-development phase, including development of a feasibility study and financial analysis. The project would potentially include construction of a recycled water tank at the project site in 2022. Based on current schedules, construction of the recycled water system expansion project would not overlap with construction of the proposed project, and given the small footprint of the cumulative project, would not add appreciably to any existing or foreseeable future cumulative impact. Incremental impacts, if any, would be very small, and the cumulative impact would be less than significant.

c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly? (Less than Significant with Mitigation)

With implementation of the recommended mitigation measures identified in this IS/MND, the potential for project-related activities to cause substantial adverse effects on human beings would be reduced to less-than-significant levels.

4. References

Airport Land Use Commission. 1996. *Mendocino County Airport Comprehensive Land Use Plan.* June 6.

Anthropological Studies Center (ASC). 2020. Archaeological Resources Study for the Mendocino Unified School District Water System Improvement Project. April.

Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act, Air Quality Guidelines. May.

California Department of Transportation (Caltrans). 2019. State Scenic Highway List. Available online: https://dot.ca.gov/-/media/dot-media/programs/design/documents/2017-03desigandeligible-a11y.xlsx

California Air Resources Board (ARB). 2018. State Area Designations. Website: https://ww3.arb.ca.gov/desig/adm/adm.htm. Accessed April 3, 2020.

California Office of Emergency Services (Cal OES). 2009. Mendocino Quadrangle Tsunami Inundation Map for Emergency Planning.

California Department of Conservation (CDC). 2016. Mendocino County Important Farmland.

Department of Water Resources (DWR). Bulletin 118. Fort Bragg Terrace Area Groundwater Basin.

GHD. 2020a. Water System Plan Report, Mendocino Unified School District. January 15.

GHD. 2020b. Biological Resource Evaluation, Mendocino Unified School District Water System Reconstruction Project. April 22.

CalFire. 2007. Mendocino County Fire Hazard Severity Zones in SRA.

California Department of Fish and Wildlife (CDFW). 2020. *California Natural Diversity Database (CNDDB).* USGS 7.5 Minute Quadrangles. State of California, Natural Resources Agency, Department of Fish and Wildlife, Biogeographic Data Branch, Sacramento, California, USA. https://www.wildlife.ca.gov/Data/CNDDB.

Federal Emergency Management FEMA Flood Map Service Center. 2017. Mendocino County Flood Zone Map.

Mendocino County Air Quality Management District (MCAQMD). 2013. Advisory; District Interim CEQA Criteria and GHG Pollutants Thresholds. December.

Mendocino County Air Quality Management District (MCAQMD). 2010. Adopted Air Quality CEQA Thresholds of Significance. June 2.

Mendocino County Air Quality Management District (MCAQMD). 2005. Particulate Matter Attainment Plan. January.

Mendocino County Air Quality Management District (MCAQMD). 2005. Map of Likely Areas to Contain NOA in Mendocino County. May, 24.

Mendocino Fire Safe Council. 2019. State Responsibility Area Map. Available online: https://firesafemendocino.org/mcwpp-maps/mcwpp-state-responsibility-area-map/ Accessed on January 14, 2020.

Mendocino County. 2019. eTRACKiT Web Permit Search Web Portal. Available online: https://etrakit.co.mendocino.ca.us/etrakit3/Search/permit.aspx Accessed on January 21, 2020.

Mendocino County. 2006. Fire Responsibility Areas & Fire District Boundaries.

Mendocino County. 2008. County of Mendocino General Plan Update Draft EIR. September.

Mendocino County. 1985. County of Mendocino Coastal Element. Revised in 1988-1991.

Mendocino County. 2009. The County of Mendocino General Plan. August.

Mendocino County. 2014. Mendocino County Multi-Hazard Mitigation Plan. May.

Mendocino County. 2014. Lands in Williamson Act and TPZ.

Mendocino County. 2016. Coastal Zone & CDP Exclusion Areas.

Mendocino County. 2016. Pygmy Type Soils in the Coastal Zone.

Mendocino USGS Quadrangle Base 42. 2013. Mendocino County Zoning Display Map.

U.S. EPA. 2020. Nonattainment Areas for Criteria Pollutants (Green Brook). Accessed April 3, 2020. Website https://www.epa.gov/green-book.

5. Report Preparers

5.1 Mendocino Unified School District

Jason Morse, Superintendent

5.2 GHD

Brian Bacciarini, Senior Environmental Scientist

Charles Smith, AICP, LEED AP, Senior Environmental Planner

Chryss Meier, Environmental Scientist

Andrea Hilton, Environmental Planner

Brian Heaton, Environmental Planner

Ken Mierzwa, Senior Biologist

Genevieve Rozhon, Wildlife Biologist

Renee Remillard, Graphic Designer

5.3 Sub-consultants

Anthropological Studies Center, Sonoma State University