

## **2.0 SUMMARY**

## **2.0 SUMMARY SECTION**

This summary section is provided in accordance with State CEQA Guidelines Section 15123. As stated in the State CEQA Guidelines Section 15123(a), “[a]n EIR shall contain a brief summary of the proposed actions and its consequences. The language of the summary should be as clear and simple as reasonably practical.” State CEQA Guidelines Section 15123(b) states, “[t]he summary shall identify: (1) each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; (2) areas of controversy known to the Lead Agency including issues raised by agencies and the public; and (3) issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.” Accordingly, this summary includes a brief synopsis of the project and project alternatives, environmental impacts and mitigations, cumulative effects and mitigation, areas of known controversy, and issues to be resolved in the environmental impact report (EIR). Table 4, at the end of this chapter, presents the summary of potential environmental impacts, their level of significance before mitigation, mitigation measures, and levels of significance with mitigation.

### **2.1. Summary of the Proposed Project**

Ukiah Land LLC (the applicant) is requesting approval of a Major Subdivision Tentative Map to subdivide the 46-acre property and eventually develop 197 single-family dwellings, of which 36 dwellings would be affordable to moderate-income households. The project is designed to be an owner-occupied residential community with park amenities and other public improvements that would be managed by a Homeowner's Association.

The project includes 2 parks (totaling 2.3 acres). The proposed subdivision includes six different types of residential lots: Hillside, Vineyard, Garden Court, Cottage, 2-Unit Townhouse, and 4-Unit Townhouse. Although all of the lots would be developed with single-family dwellings on separate lots, they differ because some of the dwellings would be traditional detached single-family dwellings (Hillside, Vineyard, and Cottage lots) while others would be attached dwellings (2-Unit Townhouse, and 4-Unit Townhouse lots).

The project includes a variety of open spaces, including two public parks where informal outdoor activities or events can be held, “Garden Courts” shared by surrounding residents and a streetscape of wide planting strips and sidewalks to allow walking and bicycle riding. Landscape improvements in these areas would be maintained by the Homeowner's Association as common areas.

Access to the property would be via an extension of Plant Road west to the project street system. A second access would be provided to Oak Knoll Road northwest of the project site.

## **2.2 Summary of Significant Unavoidable Impacts**

This EIR identifies 36 potentially significant adverse impacts that would result from project development. The EIR presents mitigation measures that would eliminate most of those impacts or reduce them to a level that is considered less than significant. Four impacts cannot be reduced to a less than significant level; they are:

1. Constructing the project will emit at least the equivalent of 7,388 tons of carbon dioxide into the atmosphere. Therefore, the project will be an increment of a significant and unavoidable cumulative impact on Global Climate Change. (Impact 3.6-B)
2. Future residential use of the project will emit the equivalent of approximately 2,589 tons of carbon dioxide per year. The emissions can be reduced by recommended mitigation measures, but the emissions will remain above the zero net increase significance threshold. Therefore, the project will be an increment of a significant and unavoidable cumulative impact on Global Climate Change. (Impact 3.6-F)
3. The traffic noise generated by the project plus other projected new development will significantly increase average noise levels along Oak Knoll Road, the northernmost block of Oak Court Road, and the south end of South Dora Street. (Impact 3.7-D)
4. The project will convert 31 acres of Prime Farmland and 2 acres of Unique Farmland to non-agricultural use. (Impact 3.10-A)

If the Planning Commission does not include the required mitigations recommended in this EIR for other potentially significant impacts, then the impacts those measures are intended to mitigate would also be judged as remaining significant adverse impacts.

It is noted that, during the public review process, the Planning Commission has the authority to determine that any of these impacts are, in fact, significant despite recommended mitigations. Ultimately, this EIR is the County's EIR, and the Planning Commission is responsible for its conclusions. If the Planning Commission believes, on the basis of data presented in this report, additional data provided during the public review process, or other public data available to the Planning Commission, that impacts should be identified as "significant," then the Planning Commission has the authority to find such impacts significant. In doing so, the Planning Commission must provide written support to justify its action(s). If impacts are deemed significant, then the Planning Commission must address these impacts when issuing a Statement of Overriding Considerations if the Planning Commission decides to approve the project.

## **2.3 Summary of Growth-Inducing Impacts**

Growth-inducing impacts of the proposed project are assessed in Section 4.1 of this EIR. That discussion concluded that the project is consistent with land use plans regulating the area and that it would not cause unforeseen development or induce development on

other vacant lands in the area. The project would not have significant growth-inducing impacts.

## 2.4 Summary of Cumulative Impacts

As described in Section 3.0, other development in the project area could combine with the project to produce cumulative physical changes to the environment. The EIR assesses cumulative impacts in the appropriate environmental topic sections of the EIR. To summarize, the project plus other development listed in Section 3.0 would have the following potentially significant cumulative impacts:

- Runoff from developed sites would potentially reduce water quality in the Russian River, and thereby adversely affect listed salmonid species and other aquatic wildlife.
- The project plus other projects could result in the conversion of oak woodlands.
- New traffic on the proposed new project connector to Oak Knoll Road would cause potential safety-related impacts.
- The new traffic on the connector would increase noise along Oak Knoll Road, the northernmost block of Oak Court Road, and the south end of South Dora Street.
- There would be an increase in the amount of particulates (PM<sub>10</sub>) released into the air.
- The project would contribute to Global Climate Change.
- The project plus other new development would increase the demand for public services, including schools, police, fire, emergency medical, water, wastewater, solid waste, and recreation services.

The project's contribution to these potentially significant impacts, except for the incremental impact on Global Climate Change and the noise impact to the Oak Knoll Road to South Dora Street corridor, can be reduced to a less than significant level by mitigation measures that are recommended for the proposed project except for the final impact. It is not possible to mitigate for the impact on Global Climate Change or noise levels, so the project would be an increment of a significant and unavoidable cumulative impact on the global climate and residential noise levels.

## 2.5 Summary of Plan and Policy Consistency

Section 3.11, Plan Consistency, of this EIR presents an evaluation of the project's consistency with pertinent policies of the Mendocino County General Plan and the Draft 2007 Ukiah Valley Area Plan (though technically this un-adopted plan does not apply to the proposed project).

That analysis concludes that the proposed project would be consistent with applicable policies and measures of those two plans. The County decision-makers would need to review the project to determine whether the final project design is, in fact, consistent with

these policies and whether changes to the project would be required in order to provide the required consistency.

## **2.6 Effects Found Not to Be Significant**

This section contains a discussion of the environmental effects that were found not to be significant pursuant to the State CEQA Guidelines Section 15128, which provides that "[a]n EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR."

### **A. Geology and Soils**

The site does not contain any unique rock outcrops or other unique geologic features. The site does not contain any mapped mineral resources or a mineral resource recovery site. As such, there would be no impacts per the criteria related to those resources. The project would be served by a municipal wastewater system, so there would be no impacts associated with on-site septic systems.

### **B. Hydrology and Water Quality**

The project would not alter the course of a stream so that streambank erosion would occur. The site is not within an area that would be subject to seiche, tsunami, or mudflow.

### **C. Biological Resources**

The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan, since there are no such plans adopted for the project site. The site would not conflict with any local ordinances that protect biological resources, since there are no such ordinances.

### **D. Traffic and Circulation**

The project would not affect air traffic and therefore would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. The project would improve emergency access in the area, so it would not have an adverse impact on emergency access.

### **E. Air Quality**

The project is a residential subdivision and would not generate odors that would affect nearby residents or businesses. The project would not conflict with or obstruct implementation of any applicable air quality plan.

## **F. Noise**

The project is a residential project and would not generate substantial groundborne noise or vibrations.

## **G. Aesthetics**

The project would not have any impacts on any State scenic highways. The project would not significantly reduce sunlight or introduce shadow in areas used extensively by the public, since the project improvements would not be near existing buildings or a public outdoor use area.

## **H. Public Services and Infrastructure**

The project would not require construction of new school, police, fire, wastewater, or solid waste facilities. Therefore, there would be no physical environmental impacts associated with construction of such facilities. The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, since there are no schools within one-quarter mile of the project site. The project would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The project would not interfere with emergency response or evacuation. The project is consistent with the regulations of the *Mendocino County Airport Comprehensive Land Use Plan (CLUP)*, so there would be less than significant hazards involving aircraft activity.

## **I. Land Use**

The project would not physically decide the existing community. The project site does not contain housing, and therefore the project would not displace substantial housing or people, necessitating the construction of replacement housing elsewhere.

## **2.7 Summary of Project Alternatives Analysis**

The State CEQA Guidelines require that an EIR include an evaluation of a range of reasonable alternatives to the project that would feasibly attain most of the project objectives while avoiding or substantially reducing any of the significant impacts of the project. Section 4.2 of this EIR contains a full description and analysis of the following six project alternatives:

- A. Alternative 1 – No Project
- B. Alternative 2 – No Project - Current Entitlement
- C. Alternative 3 – Reduced Density Consistent with Zoning
- D. Alternative 4 – Reduced Density
- E. Alternative 5 – Mitigated Project
- F. Alternative 6 – Off-Site Alternative

CEQA requires that the EIR identify the environmentally superior alternative, and this alternative is described in the final subsection of this section of the report. Table 3

compares the alternatives (except for the off-site alternative since this alternative does not have any environmental advantages over the project as proposed).

## **A. Alternative 1 (No Project)**

### **1. Description**

The No Project Alternative describes the environmental effects of not approving the proposed project. This alternative would include no new development and maintain the status quo on the site, though it would not foreclose possible future development of the site. The site would continue to be used mainly to grow commercial wine grapes.

### **2. Conclusions**

The No Project Alternative is the environmentally superior alternative because it would eliminate all the potentially significant impacts resulting from construction and future use of the project. There would remain the baseline conditions of soil erosion, dust pollution, machine noise, and water quality impacts from agricultural operations. This alternative, however, would not meet any of the project objectives because the site would retain its current use.

## **B. Alternative 2 (No Project - Current Entitlement)**

### **1. Description**

The No Project Alternative – Current Entitlement assumes that the project site would be developed with uses that are consistent with existing land use designations and zoning densities and lot sizes, without the proposed density bonus. The Mendocino County General Plan and the Zoning Ordinance designate the site Suburban Residential, which allows a maximum of six (6) residential units per acre of development space (with a minimum lot size of 6,000 square feet). Without the requested density bonus, the site could support a maximum of 171 residential units, or an approximately 13% reduction from the number of units included in the proposed project.

These units would all be single-family units (one- to two-story) on individual lots. To obtain this level of density while maintaining the required 6,000 square foot lot size would require elimination of the on-site parks. The development would be laid out like a typical subdivision with the land being used for access or homesites.

### **2. Conclusions**

Alternative 2 (Current Entitlement) would result essentially in the same type of potentially significant impacts as identified for the project. The 13% reduction in the number of units would correlate to a reduction in some impacts, but the decrease in impact would not be substantial. For other impacts, such as traffic, air quality, noise, and most public services, the amount of impact would be approximately the same as the proposed project. The drainage impacts could be increased by this alternative, and the alternative would increase the demand for parks at off-site locations. The decrease in units would not reduce any impacts to a level where the mitigation measures recommended for the

proposed project would not be required. The mitigations would reduce all impacts, except for the conversion of Prime and Unique Farmland, the cumulative traffic noise impact, and the contribution to Global Climate Change, to a less than significant level for this alternative. The alternative reduces the amount of parkland and open space. This alternative meets three or four of the eight project objectives; it does not meet the objectives of: providing a variety of building types and lot sizes; providing smaller lots to allow more open space; increasing density to allow for construction of at least 36 affordable housing units; and probably not garden setting landscaping and extensive landscaping of parks and green courts.

This alternative is environmentally superior to the proposed project, though the environmental advantages are small. The alternative is not superior to Alternative 1 (No Project), 3 (Reduced Density Consistent with Zoning), 4 (Reduced Density), or 5 (Mitigated Project).

### **C. Alternative 3 (Reduced Density Consistent with Zoning)**

#### **1. Description**

The objective of including this alternative is to measure the impacts of the project as proposed against an alternative that contains fewer units, maintains open space on the site, and maintains higher density housing, thereby potentially disrupting less of the site and requiring fewer services and infrastructure. The total number of units would be 171, as is allowed by the zoning.

For this alternative, 23 townhouse units would be eliminated, and Lots 20, 21, and 197 would be eliminated consistent with Mitigation Measure 3.2-D.2. This would result in an alternative that includes about 50 two-unit structures and 121 garden court and/or cottage lots for a total of 171 units. Otherwise, the alternative would include the other elements of the project as proposed.

#### **2. Conclusions**

Alternative 3 (Reduced Density Consistent with Zoning) would result essentially in the same type of potentially significant impacts as identified for the project. The 13% reduction in the number of units would correlate to a reduction in some impacts, but the decrease in impact would not be substantial. The decrease in units would not reduce any impacts to a level where the mitigation measures recommended for the proposed project would not be required. The mitigations would reduce all impacts, except for the conversion of Prime and Unique Farmland, the cumulative traffic noise impact, and the contribution to Global Climate Change, to a less than significant level for this alternative. This alternative meets seven of the eight project objectives; it does not meet the objective of increasing density to allow for construction of at least 36 affordable housing units.

This alternative is superior to the project as proposed and Alternative 2 (No Project Alternative – Current Entitlement), but the difference in impact is small. It is not superior to Alternatives 4 (Reduced Density) or 5 (Mitigated Project).

## **D. Alternative 4 (Reduced Density)**

### **1. Description**

The objective of including this alternative is to measure the impacts of the project as proposed against an alternative that substantially reduces the number of units. For this alternative, the number of units would be reduced by approximately 50%, resulting in 50 single family units, and 50 multi-family units. The proposed parks would be included in this alternative as would other proposed elements of the project.

### **2. Conclusions**

Alternative 4 (Reduced Density) would result essentially in the same type of potentially significant impacts as identified for the project. The 50% reduction in the number of units reduces all impacts. The major benefits are: the potential for more open space on the site; reduced runoff; reduced new traffic on South State Street and Oak Knoll Road; reduced emission of air pollutants and greenhouse gas; and reduced demand for public services and infrastructure. The reduction in traffic would reduce the noise increase along Oak Knoll Road to a 4 dBA increase. This increase is less than significant, so this alternative reduces that significant and unavoidable impact to a less than significant level. The decrease in units would not reduce any impacts to a level where the mitigation measures recommended for the proposed project would not be required. The mitigations would reduce all impacts, except for the conversion of Farmland and the contribution to Global Climate Change, to a less than significant level for this alternative. This alternative meets six of the eight project objectives; it does not meet the objective of developing 197 units of varying lot size and building type, and it does not meet the objective of increasing density to allow for construction of at least 36 affordable housing units.

The substantial reduction in the number of units under Alternative 4 (Reduced Density) decreases the amount of impact. However, it would also be a less intensive use of a site that is near the City of Ukiah and on a major arterial. Less intensive use of the site would be counter to the smart growth principles that guided the development of the Draft 2007 UVAP. While this plan has not been adopted, there was a general agreement by most participants in the public participation process and Board deliberations leading up to the selection of a draft plan (that is undergoing CEQA review) that future development should be concentrated within or adjacent to the City and that intensive land use should be favored over standard subdivision design. Intensive site use reduces resource consumption, provides more affordable housing, and reduces future demand to develop agricultural on more distant sites.

This alternative is superior to the project as proposed and to all alternatives except Alternative 1 (No Project).

## **E. Alternative 5 (Mitigated Project)**

### **1. Description**

The objective of including this alternative in the EIR is to compare the impacts of the proposed project against an alternative that contains several components that may reduce impacts more than EIR-recommended mitigation measures.

The Mitigated Project Alternative includes the following components:

- The connection of Plant Road to Oak Knoll Road would be an Emergency Vehicle Access (EVA). The road would be open to pedestrian and bicycle traffic but not motor vehicles (except for emergency use).
- Lots 20, 21, and 197 would be retained as a park/open space. Three additional units would be added to the remaining portion of the site so that the total units would remain 197 (either by adding another floor to one of the two-story multi-family buildings or converting large-lot single-family lots to smaller lots with attached townhomes).
- The applicant shall include a photovoltaic (PV) solar electricity system that will be deployed subdivision-wide for the benefit of the future residents. The system will be sized sufficiently so that it offsets 50% of the electrical use on a net-yearly basis. This equates to the applicant providing a 3.3 kilowatt photovoltaic system for each unit.
- All other mitigations, except for the required mitigations for the Oak Knoll Road connection, would be included.

### **2. Conclusions**

Alternative 5 (Mitigated Project) would have the same impacts as the proposed project except in the areas of water quality, biological resources, traffic safety, noise, and energy use (and global climate change). The alternative reduces greenhouse gas emissions by an additional 250 tons of CO<sub>e</sub> per year. The alternative eliminates new traffic (including cumulative traffic) from accessing Oak Knoll Road and the southern end of South Dora Street. This eliminates traffic safety impacts and obviates the need for roadway improvements along Oak Knoll Road. The alternative would not generate additional noise along this roadway section, thereby eliminating the significant cumulative noise impact. Eliminating this connection is counter to the County's desire for an alternate north-south connector in this area. The County has included that connection in the Draft 2007 UVAP. However, this connection is not required to maintain adequate levels of service along roadway sections or at intersections affected by project traffic or cumulative traffic coming from south of the project site. The connector would be advantageous but not required from a traffic congestion perspective. It would be advantageous from an emergency response and evacuation perspective.

The alternative meets all the project objectives. This alternative is environmentally superior to the proposed project and all alternatives except Alternatives 1 (No Project) and 4 (Reduced Density).

## **F. Alternative 6 (Off-Site Alternative)**

### **1. Description**

The only sites large enough and designated for residential development are in the area that include the project site and vacant land between the project site and Highway 253.

### **2. Conclusions**

Because the applicant cannot necessarily acquire one of the properties south of the site and north of Highway 253 that is large enough to construct the proposed project, and because the development of one of these alternative sites (if it could be acquired) would have approximately the same impacts as the proposed project, this alternative would not be superior to the project as proposed. This alternative has no advantages over the proposed project and is not included in Table 3.

## **G. Comparison of Alternatives**

There are seven alternatives under consideration: the 6 alternatives discussed above and the project as proposed (with EIR mitigations included). Table 3 compares the impact significance for the project and the alternatives.

As regards the four significant and unavoidable impacts of the project (conversion of Farmland, the cumulative traffic noise impact, and the contribution to Global Climate Change) only Alternative 1 would reduce all these impacts to a less than significant level. Alternative 4 (Reduced Density) reduces the cumulative traffic noise impact to a less than significant level, while Alternative 5 (Mitigated Project) eliminates this cumulative impact. Alternative 1 (No Project) is the environmentally superior alternative.

CEQA requires that a second environmentally superior alternative be identified if the environmentally superior alternative is the no project alternative. Alternative 4 would be the environmentally superior alternative among the remaining alternatives. Alternative 4 reduces all impacts except for the conversion of Prime and Unique Farmland and the contribution to Global Climate Change to a less than significant level. This alternative meets 6 of the 8 project objectives. Of the alternatives that meet the basic project objectives, Alternative 5 (Mitigated Project) is superior.

Recognizing that these alternatives only partially meet the objectives of the applicant, the County may consider other alternatives. To facilitate those considerations, the following list ranks the alternatives. Number 1 is environmentally superior while Number 6 is the least "superior:"

1. Alternative 1 - No Project
2. Alternative 4 – Reduced Density
3. Alternative 5 – Mitigated Project

4. Alternative 2 – No Project Alternative - Current Entitlement
5. Alternative 3 - Reduced Density Consistent with Zoning
6. Project as Proposed (with EIR mitigations)
7. Alternative 6 – Off-Site Alternative

The County can approve a hybrid alternative. For example, restricting access to the Oak Knoll Road for emergency vehicle access only could be added to the project or any of the alternatives.

**Table 3 Comparison of Project Alternatives**

Alternative 1 - No Project	Alternative 2 -- No Project -- Current Entitlement	Alternative 3 -- Reduced Density Consistent with Zoning
<p><b>Description</b></p> <ul style="list-style-type: none"> <li>• Continue use as vineyard</li> <li>• No construction of any improvements on the site or a connection to Oak Knoll Road</li> </ul>	<ul style="list-style-type: none"> <li>• Develop 171 single-family units</li> <li>• Eliminate on-site parks</li> <li>• Include all other proposed project components and mitigation measures recommended in the EIR</li> </ul>	<ul style="list-style-type: none"> <li>• Develop 50 multi-family and 121 single-family units</li> <li>• Include all other proposed project components and mitigation measures recommended in the EIR</li> <li>• No development of Lots 20, 21, and 197</li> </ul>
<p><b>Results of Analysis</b></p> <p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• Eliminates all site-specific and direct construction impacts resulting from the proposed project</li> </ul> <p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>• No addition to County housing stock</li> <li>• Not consistent with County plans for a new north-south connector</li> </ul>	<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• Reduces demand for public services by about 13%</li> <li>• Slightly reduces impacts on water quality</li> </ul> <p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>• Generates slightly more traffic than the proposed project</li> <li>• May require numerous detention facilities making it more difficult to control flooding</li> <li>• Not superior to any of the alternatives</li> </ul>	<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>• Eliminates impacts to oak trees</li> <li>• Provides buffer along Cleland Mountain Creek</li> <li>• Reduces traffic, noise, and air quality impacts by about 9%</li> <li>• Reduces demand for public services by about 13%</li> </ul> <p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>• Does not reduce other impacts to the level that Alternatives 1, 4, and 5 do</li> </ul>
<p><b>Conclusions</b></p> <ul style="list-style-type: none"> <li>• Environmentally superior</li> <li>• Does not meet any project objectives</li> </ul>	<ul style="list-style-type: none"> <li>• Not environmentally superior</li> <li>• Does not meet the objectives of: providing a variety of building types and lot sizes; providing smaller lots to allow more open space; increasing density to allow for construction of at least 36 affordable housing units; and probably not garden setting landscaping and extensive landscaping of parks and green courts.</li> </ul>	<ul style="list-style-type: none"> <li>• Not environmentally superior</li> <li>• Does not meet the objective of providing 36 affordable units</li> </ul>

**Table 3 Comparison of Project Alternatives**

Alternative 4 – Reduced Density Description	Alternative 5 – Mitigated Project	Proposed Project (with EIR Mitigations Included)
<ul style="list-style-type: none"> <li>Develop 50 single-family and 50 multi-family units</li> <li>Include all other proposed project components and mitigation measures recommended in the EIR</li> </ul>	<ul style="list-style-type: none"> <li>Develop 197 units</li> <li>The connection of Plant Road to Oak Knoll Road would be an Emergency Vehicle Access (EVA); the road would be open to pedestrian and bicycle traffic but not motor vehicles (except for emergency use)</li> <li>Lots 20, 21, and 197 would be retained as a park; three additional units would be added to the remaining portion of the site so that the total units would remain 197</li> <li>Include a photovoltaic (PV) solar electricity system that will be sized sufficiently so that it offsets 50% of the electrical use on a net-yearly basis.</li> <li>All other mitigations, except for the required mitigations for the Oak Knoll Road connection, would be included</li> </ul>	<ul style="list-style-type: none"> <li>Develop 197 units</li> <li>Lots 20, 21, and 197 would be retained as a park. Three additional units would be added to the remaining portion of the site so that the total units would remain 197</li> <li>Project would undergo design review</li> <li>Include all other proposed project components and mitigation measures recommended in the EIR</li> </ul>
<b>Results of Analysis</b>		
<u>Advantages</u>		
<ul style="list-style-type: none"> <li>Potentially more open space</li> <li>Reduces runoff and water pollution</li> <li>50% reduction in new traffic and traffic noise</li> <li>50% reduction in greenhouse gas emissions</li> <li>50% reduction in demand for new public services</li> </ul> <p><u>Disadvantages</u></p> <ul style="list-style-type: none"> <li>Inefficient use of a site adjacent to the urban area</li> </ul>	<p><u>Advantages</u></p> <ul style="list-style-type: none"> <li>Eliminates traffic safety and noise impacts along Oak Knoll Road</li> <li>Provides protection for oaks and Cleland Mountain Creek</li> <li>Reduces GHG emissions</li> </ul> <p><u>Disadvantages</u></p> <ul style="list-style-type: none"> <li>Not consistent with County plans for a new north-south roadway</li> <li>Does not reduce impacts to the level that Alternatives 1 and 4 do</li> </ul>	<p><u>Advantages</u></p> <ul style="list-style-type: none"> <li>Reduces all but four impacts to environmental resources to less than significant levels</li> </ul> <p><u>Disadvantages</u></p> <ul style="list-style-type: none"> <li>Does not reduce significant impacts as much as Alternatives 1, 2, 3, 4, or 5</li> </ul>
<u>Conclusions</u>		
<ul style="list-style-type: none"> <li>Secondmost environmentally superior alternative</li> <li>Does not meet the objective of developing 197 units nor the objective of increasing density to allow for construction of at least 26 affordable housing units</li> </ul>	<ul style="list-style-type: none"> <li>Not environmentally superior</li> <li>Meets all project objectives</li> </ul>	<ul style="list-style-type: none"> <li>Not environmentally superior</li> <li>Meets all basic project objectives</li> </ul>

## 2.8 Areas of Controversy

The proposed project raises issues and some areas of controversy that will be considered by County decision-makers. Controversial issues are known through expressions of public opinion that are documented in the record or obtained through public meetings. Prior to circulating the Draft EIR, the County circulated a Notice of Preparation (NOP) to agencies and interested parties. Comments received on the NOP and responses to those comments are found in Appendix B of this EIR.

Some areas of controversy are not within the purview of CEQA because that statute focuses on evaluation of significant effects to the *physical environment*. Those areas of controversy that relate to a physical impact issue are noted in the list below.

The main areas of controversy expressed to date are as follows (see Appendix B):

- Whether the project is too dense for the site and out of character with adjacent land uses;
- Traffic congestion, traffic safety, and noise impacts associated with providing a new connection to Oak Knoll Road;
- Whether there is adequate water and wastewater capacity to serve the project and cumulative development;
- Whether the project would cause increased flooding or impact water quality; and
- Whether the project would transform views of open space and dark night skies and adversely affect neighbors with views of the site.

## 2.9 Summary of Major Conclusions

The major conclusions of the EIR are presented in this section. The issues are presented to highlight the topics for which the decision-makers may want to focus special attention.

1. The EIR identified a total of 27 potentially significant project-specific environmental impacts and 9 cumulative impacts. Feasible mitigation is available to reduce all of these impacts to a less than significant level except for the conversion of Prime and Unique Farmland to non-agricultural use, the cumulative traffic noise impact, and the emission of greenhouse gases that are an increment of an adverse Global Climate Change.
2. The site contains soils that may be subject to ground failure or other conditions that would lead to building failure and soils and geology that would be subject to severe groundshaking during seismic events. Site development would create bare earth that would potentially erode and be transported off the site. Mitigation measures described in Section 3.1 would reduce impacts resulting from these conditions and hazards to a less than significant level.

3. New runoff could aggravate downstream flooding or cause flooding of new on-site residences. Soil eroded from the site along with chemical residues from motor vehicles, landscaping chemicals, and other urban uses would reduce the water quality of Cleland Mountain Creek and the Russian River. Mitigation measures described in Section 3.2 would reduce impacts resulting from these conditions and hazards to a less than significant level.
4. The aforementioned effects on water quality as well as construction near Cleland Mountain Creek would adversely affect species of salmonids in Cleland Mountain Creek and the Russian River. Project construction would eliminate a stand of Oregon white oaks. Site development would disrupt wildlife travel and nesting sites. Mitigation measures described in Section 3.3 would reduce impacts resulting from these conditions and hazards to a less than significant level.
5. Project-generated traffic would cause traffic safety impacts on Oak Knoll Road and South Dora Street. Widening Oak Knoll Road to accommodate project and cumulative traffic would result in loss of vegetation and front yards (though the area that would be lost is within the County's right-of-way). Mitigation measures described in Section 3.5 would reduce impacts resulting from these conditions and hazards to a less than significant level.
6. The project would increase the use of energy and corresponding greenhouse gas emissions. These emissions would be an increment in adversely changing the climate of the world. The project's increment of this cumulative impact cannot be reduced to zero, and therefore would constitute a significant and unavoidable cumulative impact.
7. Cumulative traffic using the new connector to Oak Knoll Road would increase noise along this street, the northernmost block of Oak Court Road, and the south end of South Dora Street. Mitigation measures described in Section 3.7 would reduce project impacts to a less than significant level, but the cumulative impact of traffic generated by the project plus other projected new traffic would significantly affect noise levels in this residential neighborhood. This would be a significant and unavoidable cumulative impact.
8. The project will substantially change views from surrounding vantage points, including views of the nighttime sky. Mitigation measures described in Section 3.8 would reduce impacts resulting from these conditions and hazards to a less than significant level.
9. The project would increase the demand for public services and infrastructure. Most service providers can serve the project without a significant impact. There would be an impact on parks and the emergency medical system. The site would be subject to wildfires. Mitigation measures described in Section 3.9 would reduce impacts resulting from these conditions and hazards to a less than significant level.

10. The project would result in the conversion of about 33 acres of Prime and Unique Farmland to nonagricultural use. There is no mitigation available for this impact, and it remains a significant and unavoidable impact.

## **2.10 Issues to Be Resolved**

The main issues to be resolved include:

1. The Mendocino County Planning Commission, as the principal decision-making body for the project, will need to consider whether it should adopt the project as proposed or adopt an alternative such as the Reduced Density or the Mitigated Project alternatives evaluated in this EIR. The EIR identifies the No Project Alternative as the environmentally superior alternative. The Reduced Density alternative that would allow 100 residential lots on the site is the environmentally superior alternative of the alternatives that allow some development on the site. The Mitigated Project alternative is the most environmentally superior alternative that meets most of the project objectives. When considering the merits of the project, the Planning Commission may use data in the EIR to support the approval of a project alternative.

To resolve this issue, the Planning Commission needs to review and consider the Draft EIR evaluations and the mitigation measures recommended to reduce impacts to less than significant levels. Mitigation measures for significant effects can be adopted as conditions of approval by the Planning Commission.

2. Several of the Draft EIR's mitigation measures require the project to modify the design of certain project components to reduce potentially significant impacts to a less-than-significant level. Based on the information supplied by the project sponsor and peer reviewed by the EIR team and additional information developed by the EIR team, these mitigation measures appear to be feasible. The project sponsor should carefully review these mitigation measures with their project team, however, to ensure their feasibility from technical and site planning perspectives. If the project sponsor determines a mitigation measure is not feasible, they should provide conclusive documentation to the Mendocino County Department of Planning and Building Services during the Draft EIR's public review and comment period describing why the mitigation measure may not be feasible and include for review and consideration by the Mendocino County Department of Planning and Building Services alternative mitigation measures that would reduce the corresponding significant impact to a less than significant level.
3. The project includes constructing a new road that would allow drivers from the project site and, possibly in the future, from future projects to the south to travel through residential neighborhoods on Oak Knoll Road, Oak Court Road, and South Dora Street. The EIR describes the impacts of this increased traffic and the physical impacts of constructing a sidewalk and roadway widening in this corridor. These impacts on the physical environment and traffic safety are either less than significant or can be reduced to a less than significant level by incorporating EIR-recommended mitigation measures. The cumulative traffic

would have a significant adverse noise impact on residents living along these streets. Residents living along these streets and in the surrounding area will also be affected by the loss of their front yards and landscaping (despite the fact that the yard area that would be lost is County right-of-way and thus owned by the County). The Planning Commission will need to determine whether the project should include full public access via the proposed Plant Road extension to Oak Knoll Road, consistent with County Department of Planning and Building Services and County Department of Transportation recommendations, or whether this new access to Oak Knoll Road should be an Emergency Vehicle Access only.

## **2.11 Summary Table of Impacts and Mitigations**

Table 4 summarizes the project and cumulative impacts and the mitigation measures recommended to address those impacts. The first column of Table 4 describes the impact that would result from the project. Following that impact is a description of the level of significance that impact has. Levels of significance include "beneficial," "less than significant" (that is, less than significant as measured against significance criteria established for each area of impact), "potentially significant" (i.e., significant prior to implementation of mitigation measures), or "significant."

The next column lists the recommended mitigation measures for the impact. Finally, there is a column that describes the significance of the impact after mitigation measures have been implemented.

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT		SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
3.1	<b>Geology and Soils</b> Improvements built on the site would be subject to seismic ground shaking, which could cause the failure of those improvements and risk to human health.	PS	LTS
3.1-A			A final geotechnical report shall be prepared that incorporates the recommendations set forth in the 2005 RGH Report as modified by mitigation measures recommended in this EIR. The project applicant shall design project structures and foundations to withstand expected seismic forces in accordance with the California Building Code as adopted by the County of Mendocino. Since the project site is located within Seismic Zone 4 it is considered potentially seismically active. The County shall not issue building permits until seismic design criteria are reviewed and approved. During construction adherence to design criteria shall be monitored, and a final report issued documenting conformance prior to occupancy.
3.1-B	Seismically induced ground failure, including liquefaction and densification, would cause improvements to fail and risk to human health.	PS	LTS
3.1-B.1			Potentially unstable surface soils shall be remediated by strengthening the soils during site grading. The strengthening will be achieved by excavating the weak soils and replacing them as properly compacted engineered fill. All site grading and foundation construction shall follow the recommendations of the Geotechnical Engineer of record for the project. The process will include excavation of surface soils and placement of all fill soils at a minimum of 90 percent compaction relative to the maximum dry density near the optimum moisture content as determined in accordance with ASTM D 1557. Site soils will be tested during construction by the Geotechnical Engineer-of-Record or by a Special Inspector to confirm that minimum standards are met. A final report documenting results of fill testing will be submitted to the County of Mendocino Department of Planning and Building Services and will be subject to the review of that department.
3.1-C	Potentially unstable slopes or underlying soils could cause the failure of improvements and risk to human health.	PS	LTS
3.1-C.1			Cut and fill slopes should be designed and constructed as slope gradients of 2h:1v or flatter, unless otherwise approved by the Geotechnical Engineer-of-record in specified areas. The interior slopes of the retention basin should be inclined no steeper than 3h:1v. If steeper slopes are required, retaining walls shall be used. Fill slopes steeper than 2h:1v will require the use of a Geogrid reinforcing material to increase stability.

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
		<p>Fill slopes shall be constructed by over-filling and cutting the slope to final grade. Graded slopes shall be planted with fast-growing, deep-rooted groundcover to reduce sloughing and erosion.</p> <p>Fills placed on terrain sloping at 5h:1v or steeper shall be continually keyed and benched into firm, undisturbed bedrock or firm soil. The benches shall allow space for the placement of select fill of even thickness under settlement sensitive structural elements supported directly on the fill.</p> <p>3.1-C.2 Retaining walls shall be designed to retain planned cut slopes for the 10 hillside lots that exceed 2h:1v in slope steepness and for the sidewalk between the project access and Oak Court Road. These cuts are planned to be as great as 13 feet in height. The Geotechnical Engineer-of-record shall provide revised recommendations for retaining walls if needed to meet current building code requirements. All retaining walls shall be designed by a State of California Registered Civil Engineer in accordance with requirements of the 2007 California Building Code including seismic design considerations. Retaining wall design shall be reviewed by the County of Mendocino Department of Planning and Building Services to ensure conformance with state and local building code requirements.</p> <p>3.1-C.3 Plan Review will be performed by the County of Mendocino Department of Planning and Building Services to ensure conformance with grading and drainage requirements. The Geotechnical Engineer-of-Record shall prepare a geotechnical review letter documenting that plans meet with the intent of geotechnical recommendations.</p> <p>3.1-C.4 The Geotechnical Engineer-of-Record and/or Special Inspector shall perform construction observation and testing to ensure conformance with design requirements and geotechnical recommendations. Testing and monitoring shall include:</p>

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
		<ul style="list-style-type: none"> <li>• Verification of compaction requirements for engineered fill and subgrade soils. Unless otherwise stated all engineered fill shall be compacted to at least 90 percent of the maximum dry density at moisture contents above the optimum in accordance with ASTM D 1557 test method. Subgrade beneath foundations and pavement sections shall be additionally compacted to at least 95 percent of the maximum dry density at moisture contents near the optimum.</li> <li>• Verification of the installation of subsurface drainage in accordance with project plans and specifications.</li> <li>• Verification that footings are excavated into stable material and footing excavations are of sufficient depth and breadth to adequately support structures with minimal or no settlement.</li> <li>• Materials Testing and Special Inspection of concrete, steel, asphalt, wood members and other structural elements to establish conformance with the design standards.</li> <li>• Verification of correct installation of erosion control measures and adherence to the requirements of the approved Stormwater Pollution Prevention Plan (SWPPP) for the project.</li> </ul>
3.1-D	Expansive soils on the site could cause the failure of improvements and risk to human health.	<p>3.1-D.1</p> <p>PS</p> <p>LTS</p> <p>Where spread footings are chosen for foundation support, weak, porous, compressible and locally expansive surface soil shall be excavated to within 6 inches of their entire depth. Excavation of weak, compressible, and locally expansive soils shall extend a minimum of 12 inches below exterior concrete slabs and/or asphalt concrete pavement subgrade. These soils shall be replaced with select fill material. Additionally, excavation of weak, porous, compressible, expansive, creep-prone surface materials shall extend at least 5 feet beyond the outside edge of exterior footings of the proposed buildings and 3 feet beyond the edge of exterior slabs and or pavements. These</p>

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
		<p>soils shall also be replaced with select fill material as described below.</p> <p>Select fill material shall be free of organic matter, have a low expansion potential, and conform in general to the following requirements: 100% passing 6" sieve; 90-100% passing the 4" sieve; 10-60% passing the No. 200 sieve (all percentages by dry weight); LL – 40 max; PI – 15 max; R-value – 20 min. The Geotechnical Engineer-of-Record shall approve imported material prior to use as compacted fill.</p>
<b>3.2</b>		
<p><b>3.2-A Hydrology and Water Quality</b></p> <p>Development of the project would create new impervious surfaces, increasing the rate and amount of stormwater runoff. This runoff could contribute to flooding in the vicinity of the project site.</p>	<p>PS</p>	<p>3.2-A.1 The project shall not cause flooding downstream of the project site, and post-development peak flows discharged from the southern ditch shall not exceed pre-development peak flows. At final project design, the applicant shall calculate the amount of runoff that will be generated by the developed, southern portions of Lots 20 and 21, and factor that increase into the analysis performed by Sandline and Associates to determine whether peak flow rates will remain below pre-development levels and the risk of flooding in the project site and off-site downstream will not be increased. If the post-project peak flow rates exceed the pre-development levels, the applicant shall increase the volume of the vault system storage and/or detention basin capacity to achieve the target peak flow discharge.</p> <p>3.2-A.2 As part of the Development Agreement, establish a Homeowners Association (HOA) maintenance agreement that details the provisions for regular monitoring of the status of the vault and detention pond storage capacities, as well as requirements for vault and detention pond cleanouts, when necessary, to maintain design stormwater storage levels. Establish a monitoring protocol that is acceptable to the County that monitors implementation of this maintenance, including a bond or other funding agreement that reimburses the County if the County is required to conduct required maintenance due to the HOA not implementing required</p>

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
3.2-B	Project development would result in the construction of four residential lots in the FEMA-designated 100-year floodplain of Cleland Mountain Creek.	<p>3.2-B.1</p> <p>PS</p> <p>The project shall not result in flooding of residences on the project site. To minimize the risk of flooding during the FEMA-designated 100-year base flood, the applicant shall implement one of the following alternatives:</p> <p>A) Re-design the grading plan for Lots 21-22 and 196-197 in the vicinity of Cleland Mountain Creek so that building finished floor elevations are a minimum of one foot above the land surface elevations inferred by the FIRM Zone A SFHA mapping, or</p> <p>B) Prepare a Letter of Map Revision (LOMR), accompanied by the appropriate technical documentation, and submit it to FEMA (or its sponsored contractor), to petition for a change in the FEMA SFHA designation for the project site. Required technical documentation would include an updated flood backwater profile modeling of Cleland Creek, including the proposed Plant Road bridge crossing, which was excluded from the original HEC-RAS analysis conducted for the project by Sandine Associates. If the modeling results verify that the published FEMA mapping is inaccurate and that Lots 20-21 and 196-197 are outside of the redefined SFHA, then the lots could be developed as proposed, subject to possible regulatory restrictions or conditions imposed by the California Department of Fish and Game (CDFG) and the Mendocino County Water Agency (MCWA) for disturbance of the riparian corridor. If the modeling results verify that the published FEMA flood mapping was accurate, then Alternative A would be required for development of the lots. The same potential regulatory restriction or conditions imposed by CDFG or the MCWA would apply.</p> <p>LTS</p>
3.2-C	Project development would result in the clearing of land for the proposed site improvements. During and after project construction exposed slopes will be at increased risk of erosion. Site erosion could prematurely decrease the storage capacity of the vault detention system. In addition, the diversion of stormwater runoff	<p>3.2-C.1</p> <p>PS</p> <p>The project shall not cause significant erosion. The applicant shall submit a detailed Erosion Control Plan as part of the Stormwater Pollution Prevention Plan (SWPPP) to the Mendocino County Water Agency (MCWA) and to the State Water Resources Control Board (SWRCB), in conjunction with the filing of a</p> <p>LTS</p>

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
<p>to the on-site detention system would still result in an increase in the volume of runoff conveyed by the southern drainage ditch and concentrate site stormwater discharge, both of which could increase the risk of ditch erosion and downstream sedimentation. The construction of the proposed bridge crossing over Cleland Mountain Creek would also create conditions for the discharge of fill into Waters of the United States.</p>		<p>Notice of Intent (NOI) with the SWRCB. The County shall not issue a Grading Permit until the County Water Agency agrees that the plan contains adequate Best Management Practices for controlling erosion. At a minimum, the Erosion Control Plan shall include the following restrictions, guidelines, and measures: (1) grading and earthwork shall be prohibited during the wet season (typically October 15 through April 15) and such work shall be stopped before pending storm events during the spring-fall construction season; (2) erosion control/soil stabilization techniques such as straw or wood mulching, erosion control matting, and hydroseeding, or their functional equivalents shall be utilized in accordance with applicable manufacturers specifications and erosion control Best Management Practices (BMPs) published in the <i>California Stormwater BMP Handbook - Construction</i> (California Stormwater Quality Association 2005) and/or similar prescriptions outlined in the <i>Erosion and Sediment Control Field Manual</i> (SF Bay RWQCB 2002); (3) bales of hay or accepted equivalent methods shall be installed in the flow path of graded areas receiving concentrated flows, as well as around storm drain inlets; (4) installation of silt fencing and other measures to segregate the active flow zone of Cleland Mountain Creek from the near overbank disturbance associated with bridge abutment construction; and (5) post-construction stormwater treatment measures.</p> <p>These and other erosion control BMPs shall be monitored for effectiveness and shall be subject to inspection by the County. The applicant shall be responsible for implementing any remedial actions recommended by the County. After construction is completed, all drainage facilities shall be inspected for accumulated sediment, and these drainage structures shall be cleared of debris and sediment. Silt fence shall be left in place until the hydroseed has become established.</p> <p>3.2-C.2 Riprap sections of the drainage ditch's bank at both the detention pond and the underground storage vault</p>

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
<p>3.2-D</p>	<p>Project implementation would increase the area devoted to both paved (roadway and driveway) surfaces and maintained landscaping. Episodic discharge of stormwater contaminated with heavy metals could detrimentally affect downstream water quality. Residential lot development would be accompanied by increased application of fertilizers and chemicals (such as herbicides and pesticides).</p>	<p>outlets to dissipate the erosive energy of the discharges. Stabilize the southern drainage ditch by grading its banks to slopes of 3:1 and establish riparian vegetative cover using biotechnical techniques and native erosion control mix and native tree and shrub plantings.</p> <p>In addition to implementing Mitigation Measure 3.2-C.1 and the Low Impact Development (LID) measures included on the project's Conceptual Drainage Plan, the applicant shall do the following</p> <p>3.2-D.1 The project shall not cause substantial pollution of Cleland Mountain Creek or the Russian River. The applicant shall prepare an NOI and SWPPP for the project, and incorporate the following additional site-appropriate BMPs or their equivalents for short- and long-term implementation by the Homeowners Association (HOA) and/or individual lot owners, in order to comply with the requirements of the NPDES General Permit and provisions of the Mendocino County Storm Water Management Program. The BMPs will result in stormwater leaving the site at least meeting the NCRWQCB water quality objectives for the Russian River. The SWPPP shall be approved by the Mendocino County Water Agency and the State prior to project construction.</p> <ul style="list-style-type: none"> <li>Impervious surfaces shall be minimized by using such techniques as driveway strips with bordering pervious pavement material (rather than a full paved driveway); using pervious materials for parking areas; directing runoff from rooftops and streets to landscaping buffers and/or recharge trenches.</li> <li>Install oil-grease separators at locations where street runoff enters the southern swale; or replace all or a portion of the detention pond outlet storm drain with a grass swale (i.e. bioswale) to enhance stormwater filtration of contaminants and increase local infiltration. The alignment of the drain-swale configuration could be adjusted to parallel the Plant Road entrance and then South State Street. The</li> </ul>

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
		<p>swale design should follow guidelines set forth by the North Coast RWQCB, or equivalent agencies (e.g. CA. Storm Water Best Management Practice Handbooks, Construction Activity, Camp Dresser &amp; McKee et al. 1993). In particular, swale slopes and the swale base course material should be selected to allow adequate subsurface storage for the site soil characteristics.</p> <ul style="list-style-type: none"> <li>• These and other BMPs shall be monitored for effectiveness and shall be subject to inspection by the County. The Homeowners Association shall be responsible for implementing any remedial actions recommended by the County. The applicant shall establish a monitoring protocol that is acceptable to the County that monitors implementation of these measures, including a bond or other funding agreement that reimburses the County if the County needs to conduct required maintenance due to the HOA not implementing required maintenance. The County can require that monitoring be done by a third party acceptable to the County; costs of all monitoring and any maintenance will be borne by the Homeowners Association.</li> </ul> <p>Since the objective of erosion control and water quality treatment measures would be to reduce contaminant loading to the maximum extent practicable with implementation of the best available technologies, the recommended BMPs are not fixed. Other measures can be applied as long as the applicant can demonstrate to the satisfaction of MCWA that those measures can provide equivalent levels of reduction in contaminant loading.</p> <p>The applicant shall prepare a plan that describes the roles and responsibilities of the HOA, lot owners, and/or the County for implementing the BMPs and monitoring the results. If the County will be responsible for monitoring or implementing any actions, then a funding mechanism will be established. The County will review and approve this plan prior to the onset of construction.</p>

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

	IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
32-E	The project plus other cumulative development could adversely affect the water quality of the Russian River.	PS	3.2-D.2 Per the recommendations of the CDFG, Lots 20, 21 and 197 shall be removed from the project in order to provide the minimum creekside buffer required to filter contaminants, including sediment, from stormwater runoff  Mitigation Measures for Impacts 3.2-C and 3.2-D also apply to this impact.  LTS
<b>3.3</b>	<b>Biological Resources</b>		
3.3-A	Project development could adversely affect water quality thereby indirectly affecting listed salmonid species.	PS	3.3-A.1 The applicant shall preserve water quality in Cleland Mountain Creek. A Riparian Enhancement Area that includes Lots 21, 22, and 197 shall be established. The applicant shall replant the Riparian Enhancement Area. The replanting shall include riparian species along the creek and oaks, bay, and buckeye further from the creek. The plan shall include the planting of at least three replacement trees (of the same species as the tree removed) for each oak, bay, buckeye, and Oregon ash that is removed. The planting and maintenance of the plantings shall be conducted per a final Restoration Plan prepared by a qualified biologist. The plan shall identify the entity responsible for maintenance. The County shall have the option of maintaining the area if the plan is not being followed; the HOA will be charged for the County's maintenance work. The plan shall be reviewed and approved by the California Department of Fish and Game.  LTS
3.3-B	Project construction would remove up to 25 oaks.	PS	Mitigation Measure 3.3-A.1 also applies to this impact.  LTS
3.3-C	Project construction could adversely affect Cleland Mountain Creek.	LTS	No mitigation is required.  LTS
3.3-D	Project construction would restrict wildlife movement and displace nesting sites.	PS	Mitigation Measure 3.3-A.1 also applies to this impact.  LTS
3.3-E	The project plus other proposed new development in the area could have a cumulative impact on Russian River water quality and oak woodlands.	PS	Mitigation Measures 3.2-C.1, 3.2-C.2, 3.2-D.1, 3.2-D.2, and 3.3-A.1 also apply to this impact.  LTS
<b>3.4</b>	<b>Cultural Resources</b>		
3.4-A	Cultural resources could be damaged or destroyed by project construction.	PS	3.4-A.1 If cultural resources are discovered on the site during construction activities, all earthmoving activity in the  LTS

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
		<p>area of impact shall be halted until the applicant retains the services of a qualified archaeological consultant. These archaeological sites will be documented (by a professional meeting the Secretary of the Interior qualification standards) on DPR forms and evaluated for their eligibility for the California Register. The archaeological consultant shall identify specific measures to mitigate impacts to the resource if it is deemed eligible for the California Register. Mitigation shall include data recovery operations, protection in situ of deposits, and/or archival research, if appropriate. The applicant shall abide by the recommended proposals.</p>
3.4-B	PS	<p>3.4-A.2 In the event that human skeletal remains are discovered, work shall be discontinued in the area of the discovery and the County Coroner shall be contacted. If skeletal remains are found to be prehistoric Native American remains, the Coroner shall call the Native American Heritage Commission within 24 hours. The Commission will identify the person(s) it believes to be the "Most Likely Descendant" of the deceased Native American. The Most Likely Descendant would be responsible for recommending the disposition and treatment of the remains. The Most Likely Descendant may make recommendations to the landowner or the person responsible for the excavation/grading work for means of treating or disposing of the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.</p>
3.4-B	PS	<p>3.4-B.1 During project grading operations, should any undiscovered evidence of paleontological resources be encountered, work at the place of discovery shall be halted, and a qualified paleontologist shall be consulted to assess the significance of the finds. Prompt evaluations can then be made regarding the finds, and a management plan consistent with CEQA cultural resources management requirements shall be adopted.</p>
<b>3.5</b>		
3.5-A	LTS	<p><b>Traffic and Circulation</b> The project would generate new traffic that would add congestion to study area intersections.</p> <p>No mitigation is required.</p>
		LTS

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
3.5-B	LTS	No mitigation is required.
3.5-C	PS	3.5-C.1 The project applicant shall design the proposed South State Street/Plant Road roundabout to accommodate all existing and anticipated buses and large trucks. Turning template diagrams shall be provided to the County Department of Transportation for the largest bus and trucks anticipated to be using the roundabout.
3.5-D	LTS	No mitigation is required.
3.5-E	LTS	No mitigation is required.
3.5-F	PS	3.5-F.1 The proposed bus stop internal to the project site shall be relocated in order that all patrons will enter/exit by the bus via a sidewalk, and not the middle of the street.
3.5-G	LTS	No mitigation is required.
3.5-H	LTS	No mitigation is required.
3.5-I	LTS	No mitigation is required.
3.5-J	LTS	No mitigation is required.
3.5-K	PS	3.5-K.1 The project applicant and other cumulative projects generating traffic to the new connector shall provide at least 11-foot-wide travel lanes and four-foot-wide shoulders along Oak Knoll Road to its northernmost intersection with Oak Court Road and along the one-block section of Oak Court Road from this intersection to North Court Road. The fair share of the cost shall be based on the percentage of trips generated by the new developments. The Development Agreement will establish a financing process to ensure that the applicant pays its fair share of this improvement.  3.5-K.2 All future projects proposed between the Garden's Gate site and Highway 253 shall be assessed by a traffic engineer to determine whether that project plus other already constructed or approved projects would

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
3.5-L	Implementation of Mitigation Measure 3.5-K.1 would result in loss of yards for residences along Oak Knoll Road.	<p>generate sufficient cumulative traffic to trigger a significant safety impact between the Garden's Gate access to Oak Knoll Road and South Dora Street. The improvements would be constructed prior to final construction of the project triggering the need for the improvement.</p> <p>3.5-L.1 Widening of Oak Knoll Road shall not cause slope failure or substantial soil erosion. The County shall have a final geotechnical design prepared by a licensed geotechnical expert that describes final retaining wall design and how any cuts and fills will be conducted. The final plan shall also include an erosion control plan. The road shall be widened per the recommendations of this final design.</p> <p>3.5-L.2 The County shall replace each oak tree removed during widening by replanting and maintaining (for at least 5 years) 3 oaks for each oak removed. The oaks can be planted on the Garden's Gate site or another suitable site.</p>
<b>3.6</b>	<b>Air Quality</b>	
3.6-A	Construction activities associated with development of the project would generate short-term emissions of criteria pollutants, including fine and respirable particulate matter and equipment exhaust emissions.	<p>3.6-A.1 The project applicant and construction contractor shall for all construction project phases prepare and implement a dust control program to limit construction emissions of PM<sub>10</sub>. The program shall include at least the following provisions from MCAQMD Rule 1-430 Fugitive Dust. Because the site is over one acre in size, a Grading Permit must be approved by MCAQMD, and MCAQMD may require additional mitigations.</p> <ol style="list-style-type: none"> <li>Covering open bodied trucks when used for transporting materials likely to give rise to airborne dust.</li> <li>The use of water or chemicals for control of dust in the demolition of existing buildings or structures.</li> <li>All visibly dry disturbed soil road surfaces shall be watered to minimize fugitive dust emissions.</li> <li>All unpaved surfaces, unless otherwise treated with suitable chemicals or oils, shall have a posted speed limit of 10 miles per hour.</li> <li>Earth or other material that has been transported by</li> </ol>

TABLE 4 - IMPACT AND MITIGATION SUMMARY

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION	SIGNIFICANCE AFTER MITIGATION
3.6-B	PS	<p>trucking or earth moving equipment, erosion by water, or other means onto paved streets shall be promptly removed.</p> <p>f. Asphalt, oil, water or suitable chemicals shall be applied on materials stockpiles, and other surfaces that can give rise to dust emissions.</p> <p>g. All earthmoving activities shall cease when sustained winds exceed 15 miles per hour.</p> <p>h. The operator shall take reasonable precautions to prevent the entry of unauthorized vehicles onto the site during non-work hours.</p> <p>i. The operator shall keep a daily log of activities to control fugitive dust.</p> <p>No mitigation is available.</p>	S
3.6-C	LTS	<p>Construction activities associated with development of the project would be responsible for the one-time emission of Greenhouse Gases (GHG) into the atmosphere.</p> <p>Project operation would increase regional emissions of criteria pollutants (ROG, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>) from on-road motor vehicle traffic traveling to and from the project area and from on-site area sources associated with the project.</p>	LTS
3.6-D	LTS	<p>Mobile source emissions generated by project traffic would increase carbon monoxide (CO) concentrations at intersections in the project vicinity.</p>	LTS
3.6-E	LTS	<p>The project plus buildout of the Ukiah Valley would generate air pollutants.</p>	LTS
3.6-F	PS	<p>The project will use more energy and thereby generate greenhouse gas emissions that would adversely affect the global climate.</p>	S
3.6-F.1		<p>The project shall minimize the emission of greenhouse gases by including at least the following:</p> <ul style="list-style-type: none"> <li>• Install solar hot water heaters with a back-up electric water heater.</li> <li>• The project shall be constructed to incorporate the 2010 Title 24 building standards (or whatever standards have been adopted at the time that building permits are issued).</li> <li>• The project shall include a photovoltaic (PV) solar electricity system that will be owned and operated by the Homeowner's Association for the benefit of the future residents. The system will be sized</li> </ul>	

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
		<p>sufficiently so that it totally offsets electrical use from project parks, recreational facilities, and other facilities owned or managed by the Homeowners Association.</p> <ul style="list-style-type: none"> <li>Project residential units shall be oriented for maximum solar access. Roofs shall be constructed to allow easy and efficient retrofitting with roof-top solar panels.</li> <li>The project applicant shall ensure that the CC&amp;Rs of the Homeowner's Association do not preclude the use of energy- or water-saving technologies or practices for aesthetic reasons.</li> <li>The project applicant shall ensure the Homeowner's Association develops and maintains energy- and water-efficient practices for the common areas of the subdivision and follows a landscaping plan that does not impair the efficient operation of the solar collection facilities.</li> </ul>
<b>3.7</b>		
3.7-A	Noise The east end of the project would be exposed to excessive noise.	<p>3.7-A.1 PS</p> <p>Project-specific acoustical analyses shall be required to confirm that outdoor activity areas are provided with Ldn values at or below 60 dBA, and interior Ldn values will not exceed 45 dBA. Sound insulation measures, including any mechanical ventilation systems needed to permit closed windows, should be designed by an experienced acoustical consultant and incorporated into construction documents submitted for permits.</p> <p>No mitigation is required.</p> <p>LTS</p>
3.7-B	The project would increase noise levels in the area surrounding the project site.	<p>3.7-C.1 PS</p> <p>Project construction shall not cause excessive noise. To accomplish this standard, the following measures are required:</p> <ul style="list-style-type: none"> <li>Noise-generating activities at the construction site or in areas adjacent to the construction site associated with the project in any way should be restricted to the hours of 7:00 a.m. to 6:00 p.m., Monday through Friday. No construction activities</li> </ul> <p>LTS</p>
3.7-C	Construction of project improvements would generate construction noise over a period exceeding one year.	<p>3.7-C.1 PS</p> <p>Project construction shall not cause excessive noise. To accomplish this standard, the following measures are required:</p> <ul style="list-style-type: none"> <li>Noise-generating activities at the construction site or in areas adjacent to the construction site associated with the project in any way should be restricted to the hours of 7:00 a.m. to 6:00 p.m., Monday through Friday. No construction activities</li> </ul> <p>LTS</p>

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
		<p>should occur on weekends or holidays.</p> <ul style="list-style-type: none"> <li>• Equip all internal combustion engine driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.</li> <li>• Unnecessary idling of internal combustion engines should be strictly prohibited.</li> <li>• Locate stationary noise generating equipment such as air compressors or portable power generators as far as possible from sensitive receptors. Construct temporary noise barriers to screen stationary noise generating equipment when located near adjoining sensitive land uses.</li> <li>• Utilize "quiet" air compressors and other stationary noise sources where technology exists.</li> <li>• Control noise from construction workers' radios, CD players, etc. to a point that they are not audible at existing residences bordering the project site.</li> <li>• Designate a "disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.</li> <li>• Notify existing residents when especially noisy operations are scheduled near their property, allowing the residents to plan activities accordingly. Examples of especially noisy sources: heavy earth moving equipment, jack hammers, pile drivers.</li> </ul>

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
3.7-D Traffic noise generated by the project plus other projects that would be completed by 2015 would increase noise levels in the area surrounding the project site.	PS	There are no mitigation measures available for this impact.  S
<b>3.8</b>		
3.8-A <b>Aesthetics</b> The project would replace views from South State Street and other vantage points east of the site of open space with views of residential development.	PS	3.8-A.1 The Development Agreement between the County and the applicant shall include a condition that the applicant agrees that final project design and landscape plan shall undergo design review by the County Department of Planning and Building Services and/or the County Planning Commission to ensure consistency with the County General Plan, the Ukiah Valley Area Plan (if adopted at the time the final design is submitted), the County design review guidelines (if adopted at the time the final design is submitted), and the County Code. The final project shall be revised, if requested, to comply with the County's review recommendations.  3.8-A.2 Landscaping will be mature within 15 years of initial project construction (Phase 1). Mature means that perimeter trees shall be at least 20 feet tall. The final landscape plan shall include tree landscaping along the north and east sides of the site using species that fully screen views from the east and screens at least half of the buildings on the north side. The plan shall include specifications for planting, irrigating, fertilizing, and replacing dead trees so that the landscaping will be mature within 15 years.  LTS
3.8-B The project would replace views from Highway 101 of open space with views of residential development.	LTS	No mitigation is required.  LTS
3.8-C The project would replace views from Gobalet Lane, residences north of Gobalet Lane, and residences south of Oak Knoll Road of open space with views of residential development.	PS	Mitigation Measures 3.8-A.1 and 3.8-A.2 apply to this impact.  LTS
3.7-D The project would replace views from residences along Stipp Lane and other residences to the south of open space with views of residential development.	LTS	No mitigation is required.  LTS
3.8-E The project would replace views from residences along Oak Knoll Road and possibly other residences at upper elevations to the northwest of open space	LTS	No mitigation is required.  LTS

TABLE 4 - IMPACT AND MITIGATION SUMMARY

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
<p>3.8-F with views of residential development. New lighting on the project site will change nighttime views in the area.</p>	<p>PS</p>	<p>3.8-F.1 The final design shall include a lighting plan that minimizes light escape from the site. The final plan shall become part of the CC&amp;Rs for the Homeowners Association. This plan shall include the following:  1. <i>Light shielding is required.</i> Except as otherwise exempt, all outdoor lighting fixtures shall be constructed with full shielding. Shielding shall prevent the light source from being visible to adjacent residential properties.  2. <i>Minimum/Maximum Level of Illumination.</i> The minimum and maximum levels of illumination permitted are listed below. A photometric study listing the number, type, height, and level of illumination of all outdoor lighting fixtures shall be required prior to issuance of a building permit or site improvement plans to ensure compliance with these provisions.  a. Minimum security lighting for sidewalks, walkways, parking areas, and similar areas shall be 1.0 foot-candles, measured at ground level, not to exceed 4.0 foot-candles on average.  b. In order to minimize light trespass on abutting property, illumination measured on the property line of a subject parcel shall not exceed 0.5 foot-candles, measured on a vertical plane along the property line.  c. Building-mounted decorative or security lights shall not exceed 5.0 foot-candles, measured a distance of five feet from the light source. All building lighting shall be reviewed and authorized by Mendocino County prior to the initiation of lighting installation.  3. <i>Maximum Height of Outdoor Light Fixtures.</i> The maximum height of freestanding outdoor light</p>

TABLE 4 - IMPACT AND MITIGATION SUMMARY

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
		<p>fixtures for multi-family residential development and non-residential development abutting a single-family residential zoning district or use shall be 20 feet. Otherwise, the maximum height for freestanding outdoor light fixtures shall be 25 feet.</p> <p>4. <i>Type of illumination.</i> All outdoor lighting fixtures shall be energy efficient. Energy efficient lights include all high-intensity discharge lamps (mercury vapor, high-pressure sodium, low-pressure sodium, and metal halide). The concentrated and/or exclusive use of either low-pressure sodium or metal halide lighting is prohibited.</p> <p>5. <i>Hours of illumination.</i> Automatic timing devices shall be required for all outdoor light fixtures on multi-family residential and non-residential development (e.g., parks) with off hours (exterior lights turned off) between 11:00 p.m. and 6:00 a.m. Exceptions are that outdoor lights may remain on in conjunction with the hours of operation of the corresponding use, for security purposes, or to illuminate walkways, roadways, equipment yards, and parking lots.</p> <p>6. <i>Prohibited Lighting.</i> The following outdoor light fixtures shall be prohibited as specified below.</p> <ol style="list-style-type: none"> <li>Lighting of parks for active nighttime recreation.</li> <li>Uplighting/back-lit canopies or awnings.</li> <li>The concentrated and/or exclusive use of either low-pressure sodium or metal halide lighting</li> <li>Neon tubing or band lighting along building structures</li> <li>Searchlights.</li> <li>Flashing lights.</li> <li>illumination of entire buildings. Building illumination shall be limited to security</li> </ol>

TABLE 4 - IMPACT AND MITIGATION SUMMARY

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
		lighting and lighting of architectural features authorized by the designated Approving Authority in conjunction with the required development permit(s). h. Roof mounted lights except for security purposes with motion detection and full shielding so that the glare of the light source is not visible from any public right-of-way.
<b>3.9</b>		
<b>Public Services and Utilities</b>		
3.9-A	LTS	No mitigation is required.
3.9-B	LTS	No mitigation is required.
3.9-C	PS	3.9-C.1 The final project design shall be reviewed by the Sheriff's Office to determine if it provides adequate access, security lighting, and other factors affecting police response. The final map shall incorporate security measures required by the Sheriff's Office.
3.9-D	LTS	No mitigation is required
3.9-E	PS	No mitigation is required beyond compliance with County Environmental Health requirements.
3.9-F	PS	3.9-F.1 If the County has not adopted additional funding for the EMS system at the time of approval of the Development Agreement, then the applicant shall agree within the Development Agreement to pay any fees that the County adopts for EMS funding prior to and/or within five years of approval of the Development Agreement.
3.9-G	LTS	No mitigation is required.

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
3.9-H The project would contribute to the need for a new water storage facility.	PS	3.9-H.1 The applicant shall enter into an agreement with the Willow County Water District to pay a capital improvement fee (estimated at \$400,000) to fund the project's share of the replacement and expansion of the Fircrest Drive water storage tank. LTS
3.9-I The project would increase the demands for wastewater collection, treatment, and disposal but would not exceed wastewater treatment requirements or require construction or expansion of wastewater facilities.	LTS	No mitigation is required. LTS
3.9-J The project plus other new development in the Ukiah Valley Sanitation District would increase the demands for wastewater services.	LTS	No mitigation is required. LTS
3.9-K Development in the plan area would generate solid waste that would need to be accommodated at the Ukiah Valley Transfer Station and the Potrero Hills Regional Landfill.	LTS	No mitigation is required. LTS
3.9-L The project plus other new development in the area would increase the demands for solid waste services.	LTS	No mitigation is required. LTS
3.9-M The project would increase the plan area population, thereby increasing the demand for parks and recreational facilities. This increased demand could result in significant deterioration of existing facilities and the need for new or expanded facilities.	PS	3.9-M.1 Construct and maintain a "tot lot" with playground equipment on one of the two project parks. The tot lot will be maintained by the Homeowner's Association. 3.9-M.2 Construct a soccer field or ballfields on the larger proposed park. The soccer field/ballfields will be available for public use. OR The project applicant will agree to pay the County's park in-lieu fee when the County adopts the fee program. If the County has not adopted such a fee by 2012, then the applicant will be required to construct the soccer field or ballfields. The applicant shall notify in writing all future homebuyers on the project that the park may be developed with an active playfield at some point in the future. LTS
3.9-N The project plus other new development in the area would increase the demands for parks and recreational services.	LTS	No mitigation is required. LTS
3.9-O Future development could be placed in locations where people and structures would be exposed to	PS	3.9-O.1 The project shall be designed and constructed to minimize risk of wildfire destroying residences. The LTS

**TABLE 4 - IMPACT AND MITIGATION SUMMARY**

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
potential wildland fires.		Ukiah Valley Fire District shall review project plans and determine in writing that adequate access, emergency response, and fireflow are available, and that the project complies with the most current State requirements for development in the wildland/urban interface. Final project design shall conform with any changes that the District requires.
3.9-P Future development in the plan area could cause conflicts with emergency response and evacuation plans.	LTS	No mitigation is required.
3.9-Q Aircraft using the Ukiah Municipal Airport could crash on the project site causing bodily harm and property damage.	LTS	No mitigation is required.
3.9-R Toxic materials and wastes on the site could pose a risk to human health.	PS	<p>3.9-R.1 All potential toxic wastes and materials shall be removed and/or remediated prior to site grading. The applicant shall do the following, as recommended in the Phase I Environmental Site Assessment:</p> <ul style="list-style-type: none"> <li>• Abandon any inoperable water supply wells on the site following all the requirements of the Mendocino County Division of Environmental Health.</li> <li>• Collect soil samples in the area of the former underground storage tank and the aboveground fuel storage tank. The soil samples shall be tested for Total Petroleum Hydrocarbons as gasoline and the constituents benzene, toluene, ethylbenzene, xylenes, fuel oxygenates, lead scavengers, and total lead. Results of the testing shall be provided to the Mendocino County Division of Environmental Health. If the Division, determines that additional testing or remediation is required, the applicant shall fulfill all County requirements.</li> <li>• Dispose of any waste oil, lubricants, paints, or other liquids in accordance with all applicable regulatory requirements.</li> <li>• Investigate the fuel source for the prune dryer that formerly was located on the west side of the site to determine its fuel source. If it was gasoline, then conduct soil tests at that site as described above.</li> </ul>

TABLE 4 - IMPACT AND MITIGATION SUMMARY

IMPACT	SIGNIFICANCE BEFORE MITIGATION	SIGNIFICANCE AFTER MITIGATION
3.9-S	Providing new traffic access via Oak Knoll Road emergency response and evacuation plans.	B
<b>3.10</b>	<b>Land Use</b>	No mitigation is required.
3.10-A	Project development would convert approximately 31 acres of Prime Farmland and 2 acres of Unique Farmland to non-agricultural uses.	PS
3.10-B	Project development could result in Farmlands to the south and north of the site being converted to non-agricultural use.	LTS
	<ul style="list-style-type: none"> <li>Assess whether the workshop/storage building has the potential for lead paint or asbestos. If so, then demolition shall follow all requirements established by the Mendocino County Division of Environmental Health.</li> </ul>	B
	No mitigation is required.	B
	No mitigation is available.	S
	No additional mitigation is required.	LTS