

Executive Summary

This document is a Draft Environmental Impact Report (EIR) analyzing the environmental effects of the proposed City of Ukiah 2040 General Plan, herein referred to as “Ukiah 2040” or “the project.” This section summarizes the characteristics of the project, alternatives to the project, and the environmental impacts and mitigation measures associated with the project.

Project Synopsis

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Project Description

This EIR has been prepared to examine the potential environmental effects of Ukiah 2040. The following is a summary of the full project description, which can be found in Chapter 2, *Project Description*.

Guiding Principles

The City of Ukiah developed guiding principles to expand on the main ideas contained in the vision statement. The following guiding principles express the key values and aspirations for Ukiah’s future and serve as guideposts for the goals, policies, and implementation programs contained in Ukiah 2040:

- Guide land uses and development that meet the needs of the community, are environmentally conscious, and maintain Ukiah as a diverse, family-oriented, and friendly community, where people from all racial, ethnic and cultural backgrounds thrive socially, economically, academically, and physically.
- Ensure development in all neighborhoods is compatible with the unique characteristics and land use patterns and fosters a sense of place.
- Promote resilient and sustainable facilities and infrastructure to ensure delivery of high-quality services.
- Promote a diverse, local, business-friendly economy that fosters new job growth and is adaptable to changes in consumer habits and market trends.

- Maintain and advance a well interconnected circulation network that accommodates and encourages alternative modes of transportation that reduce congestion and encourage walkable and bikeable neighborhoods.
- Preserve existing open space resources while enhancing accessibility to parks and recreational amenities.
- Manage, conserve, and preserve the existing natural environment to ensure sustainable longevity for present and future generations.
- Provide for a safe community through resilient infrastructure, community-wide education and preparation, and hazard planning that is responsive to potential climate-related, natural, and human-caused disasters.
- Preserve Ukiah Municipal Airport as a vital economic driver and transportation system and maintain consistency with the criteria and policies of the Ukiah Municipal Airport Master Plan and Mendocino County Airport Land Use Compatibility Plan.
- Foster an inclusive community through conditions that allow for and stimulate a diversity of housing options for community members of all ages, incomes, and ethnicities.

Ukiah 2040 Organization

The project is a comprehensive update of the City's current 1995 General Plan, which is made up of 13 chapters. To provide a contemporary plan that will guide the community through the year 2040, Ukiah 2040 has been reorganized and reformatted to addresses changes in the community, including new issues and opportunities, changes in state law, and new trends. Ukiah 2040 is comprised of seven elements, summarized as follows:

- **Land Use Element.** This element will consider current and proposed land use amendments.
- **Economic Development Element.** This element will focus on goals and policies to promote and further economic development, job retention, and fiscal sustainability within Ukiah.
- **Agricultural Element.** This element will focus on goals and policies to conserve agricultural resources within Ukiah.
- **Mobility Element.** This element will address existing and planned vehicle, pedestrian, and bicycle infrastructure across the City.
- **Public Facilities, Services, and Infrastructure Element.** This element will focus on goals and policies related to public services, including but not limited to police, fire, airport, recreation, water/wastewater, and emergency services.
- **Environment and Sustainability Element.** This element will address the wide variety of parks, trails, and open spaces serving the diverse recreation needs of Ukiah residents, particularly youth, and emphasize the unique features of the City's natural environment. This element will also consider the effects of existing and planned development on natural resources located on public lands.
- **Hazards and Safety Element.** This element will cover seismic activity, other geologic hazards, fire hazards, hazardous materials, flooding, and other potential hazards, consistent with Government Code Section 65302(g). It will also address resiliency and risks from natural hazards in Ukiah, pursuant to SB 379. This element will also cover noise element requirements, consistent with Government Code Section 65302(f), including new existing noise contours as well as projected noise contours based on future traffic volumes projected to arise from improvements planned for in the Mobility Element.

Proposed Land Use Designations

The project would result in changes to the existing land use pattern in the City. Ukiah 2040 introduces new and expanded land use designations that provide a greater distinction between residential and commercial land use types and better align existing land uses with corresponding designations. Specifically, the project divides the existing Commercial land use designation into more detailed designations: Downtown Core, Highway Commercial, Community Commercial, and Neighborhood Commercial. The project also introduces four new designations to the City's Land Use Map: Hillside Residential, Agriculture, Mixed Use: Brush Street Triangle, and Mixed Use: AIP-PD.

Planning Area

A general plan, pursuant to State law, must address all areas within the jurisdiction's Planning Area. The Planning Area encompasses all incorporated and unincorporated territory that bears a physical relationship to the long-term planning of the city. For Ukiah, the Planning Area is defined as the area that includes both the city limits and SOI, as well as the existing Ukiah Valley Area Plan boundary.

Proposed Sphere of Influence

The City of Ukiah's current sphere of influence (SOI) was adopted in 1984, Ukiah 2040 would result in an update to the City's SOI, and would include areas north, east, and south of city limits. The SOI update is intended to reduce the City's ultimate probable boundary. The decision to update the City's SOI is based upon direction provided by the Ukiah City Council in January 2020.

Proposed Annexation Areas

As part of the proposed project, the City of Ukiah is pursuing three separate annexation areas currently located in the County of Mendocino's jurisdictional boundaries, totaling approximately 1,617 acres. Annexation Area A consists of 16 City-owned properties located southeast, northeast, and west of the City, totaling approximately 437 acres. Annexation Area B is comprised of the Bush Street Triangle/Masonite area north of the City and contains 63 properties, totaling approximately 473 acres. Annexation Area C is concentrated in the hills west of Ukiah. This area contains approximately 752 acres and a portion of that area (707 acres) is being pursued as part of the Western Hills Open Land Acquisition and Limited Development Agreement, approved by City Council on September 15, 2021.

Project Buildout

Ukiah 2040 designates land uses defining the type and amount of development that can occur throughout the City and proposed annexation areas through the planning horizon year of 2040 (over approximately 18 years). Ukiah 2040 also includes increased residential densities (number of units) and building intensities (floor area ratio [FAR]) for certain land use designations compared to the existing density and intensity thresholds. Development projections for the project were determined by analyzing vacant and underutilized parcels with the buildout capacity potential that is allowed under the applicable updated land use designations, the incorporation of annexation areas being pursued by the City of Ukiah, and the development of mixed-use designated areas anticipated under Ukiah 2040. Based on the potential land use changes, the project has a maximum buildout potential of an additional 2,350 housing units and an additional 4,514,820 square feet of non-residential use. This buildout is an estimate of maximum buildout and is used as a conservative assumption in the environmental analysis of this EIR. While Ukiah 2040 would facilitate development, the development of the various land uses associated with Ukiah 2040 would occur over an extended

period and would depend on factors such as local economic conditions, market demand, and other financing considerations. For example, a future developer may choose to develop a site at a density lower than what is allowed, or a vacant lot could remain vacant for several years until a development is identified for that property. For these reasons, the maximum buildout is an estimate and is not intended to predict the amount of development that will occur in the City in the future. Furthermore, this buildout is projected to occur specifically within the existing City limits and Annexation Areas. Overall, Ukiah 2040 would promote infill development; the redevelopment of abandoned, obsolete, or underutilized properties; and the adaptation of existing residential units to support multi-family use. Future development within the remaining SOI and Planning Area will be analyzed under California Environmental Quality Act (CEQA) on a project-level basis.

Alternatives

As required by CEQ, this EIR examines alternatives to the proposed project. Studied alternatives include the following two alternatives.

- Alternative 1: No Project Alternative
- Alternative 2: Decreased Residential Density

Alternative 1

The CEQA Guidelines (Section 15126.6[e][2]) require that the alternatives discussion include an analysis of a No Project Alternative. Pursuant to CEQA, the No Project Alternative refers to the analysis of existing conditions and what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

The No Project Alternative assumes there is no change in zoning or General Plan land use designations and analyzes the existing General Plan land use designations and densities for vacant land within the City. The No Project Alternative includes identified sites for annexation, as well as housing sites identified as part of the 2019-2027 Housing Element. As the No Project Alternative focuses on existing designations, Annexation Areas would have existing land use designations, in contrast to the proposed project, which apply City land use designations to these areas. Buildout under the No Project Alternative, assuming a maximum buildout scenario, would allow for 1,692 housing units and approximately 3,831,300 square feet of additional non-residential land uses. However, the No Project Alternative would not accomplish project objectives to the extent that the proposed project would, as the No Project Alternative would provide reduced housing options and exclude multiple policies from Ukiah 2040 pertaining to community development, preservation of natural resources, sustainability, and improvement of Ukiah's circulation network.

Alternative 2

The Decreased Residential Density Alternative (Alternative 2) assumes increased residential densities (1,868 units total) allowed by each land use designation compared to the existing General Plan or No Project Alternative (1,692 units total) but decreased residential densities when compared to the proposed project (2,350 total units). For example, the existing General Plan allows High Density Residential development of up to 28 dwelling units per acre (du/ac) and the proposed project (as well as Alternative 2) would allow a density of up to 40 du/ac. Both the proposed project and Alternative 2 would apply new and/or existing General Plan land use designations to lands within the city limits and Annexation Areas. However, Alternative 2 would not add new land use designations intended to increase commercial land uses and would rely on existing General Plan

land use designations (and densities). Because Alternative 2 would maintain the same designations as the General Plans for non-residential spaces, the buildout of non-residential space would be the same as the No Project Alternative. In addition, Alternative 2 would not add some of the new land use designations identified for the proposed project, which explains why Alternative 2 would have less residential units than the proposed project.

Assuming a maximum buildout scenario, buildout under Alternative 2 would allow for 1,868 housing units and approximately 3,831,300 square feet of additional non-residential land uses (refer to Table 5-1). Non-residential development would be the same as the No Project Alternative but would be less than the proposed project. Resulting residential density would be less than the proposed project and more than the No Project Alternative. However, Alternative 2 would not accomplish project objectives to the extent that the proposed project would, as Alternative 2 would provide reduced housing options.

Environmentally Superior Alternative

CEQA requires identification of the environmentally superior alternative among the alternatives to the proposed project. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as the environmentally superior alternative may not be that which best meets the goals or needs of the proposed project.

The No Project Alternative is the environmentally superior alternative as it lessens the severity of most impacts of the proposed project. Because the No Project Alternative would reduce overall development (residential and non-residential) compared to the proposed project, the overall impacts from construction would also be reduced since there would be less construction. If the No Project Alternative is determined to avoid or reduce more impacts than any other alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e]). Of the other alternatives evaluated in this EIR, the Decreased Residential Density Alternative (Alternative 2) would be the environmentally superior alternative. Alternative 2 would result in less construction impacts (air quality construction emissions, biological resources, cultural resources, greenhouse gas emissions, temporary noise, tribal cultural resources, and paleontological resources) than the proposed project because of a reduction in buildout. In addition, Alternative 2 would result in less operational impacts (aesthetics, air quality, greenhouse gas emissions, noise, public services, recreation, and utilities) due to the reduced buildout. Nonetheless, compared to the proposed project, Alternative 2 would not fulfill the project objectives as well. This is because the proposed project would offer more housing opportunities and a diversity of land uses for future Ukiah residents.

Pursuant to CEQA requirements, Alternative 2 would be considered the environmentally superior alternative; however, the proposed project would offer benefits that would not be achieved by Alternative 2, primarily housing opportunities and a diversity of land uses.

Areas of Known Controversy

The EIR scoping process did not identify areas of known controversy for Ukiah 2040. Responses to the Notice of Preparation of a Draft EIR as well as public input received at the EIR scoping meeting held by the City are summarized in Chapter 1, *Introduction*.

Issues to be Resolved

There are no CEQA-related issues to be resolved at this time.

Issues Not Studied in Detail in the EIR

Section 4.16, *Effects Found Not to be Significant*, briefly analyzes issues from the environmental checklist that were determined to not have significant impacts. As discussed in Section 4.16, there is no substantial evidence that significant impacts would occur to Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, and Mineral Resources.

Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the environmental impacts, mitigation measures, and the residual impact (impact after application of mitigation, if required) associated with implementation of Ukiah 2040. Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved pursuant to Section 15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures.
- **No Impact.** The project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure(s)	Residual Impact
Aesthetics		
Impact AES-1. Development facilitated by the project may impact scenic vistas; however, compliance with Ukiah 2040 proposed goals and policies, Ukiah City Code, and the City’s Design Guidelines would ensure that new development does not have a substantial adverse effect on scenic vistas. Impacts would be less than significant.	None required.	Less than Significant
Impact AES-2. The project would have no impact to scenic resources visible from a state scenic highway.	None required.	No Impact
Impact AES-3. Implementation of the project would facilitate development in previously undeveloped areas through rezoning and changes to land use. Scenic quality would be protected through adherence to City design guidelines, Ukiah city code, and implementation of Ukiah 2040 proposed goals and policies that address visual quality. Impacts would be less than significant.	None required.	Less than Significant
Impact AES-4. Development facilitated by the project would introduce new sources of light and glare. With adherence to existing ordinances that regulate light and glare for new development, impacts would be less than significant.	None required.	Less than Significant
Agricultural and Forestry Resources		
Impact AG-1. Development facilitated by the project is designed to encourage the continued operation of existing agriculture in and surrounding the city. Buildout of the project would result in a decrease of seven acres of designated agricultural land within the proposed annexation areas but with implementation of Ukiah 2040 goals and policies, impacts would be less than significant.	None required.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
<p>Impact AG-2. The project would not conflict with existing zoning for forest land, timberland, or timberland production, nor result in the loss of forest land or convert forest land to non-forest uses. There would be no impact.</p>	<p>None required.</p>	<p>No Impact</p>
Air Quality		
<p>Impact AQ-1. The project would be consistent with MCAQMD’s 2005 Particulate Matter Attainment Plan and BAAQMD’s 2017 Clean Air Plan. Impacts would be less than significant.</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact AQ-2. Development facilitated by the project would result in the generation of air pollutants during construction, which could affect local air quality. Development facilitated by the project would also result in a net increase of criteria pollutants due to VMT. All feasible mitigation measures to reduce VMT are included as Policies in Ukiah 2040. Overall operational impacts would be significant and unavoidable.</p>	<p><i>AQ-1 Implement BAAQMD and MCAQMD Basic Construction Mitigation Measures</i></p> <p>To reduce fugitive dust emissions from the construction of individual projects, the City shall require that future projects implement the BAAQMD and MCAQMD Basic Construction Mitigation Measures. These include, but are not limited to, the following:</p> <ul style="list-style-type: none"> ▪ All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times a day. ▪ All haul trucks transporting soil, sand, or other loose material off-site shall be covered. ▪ All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. ▪ All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. ▪ All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. ▪ Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points. ▪ All construction equipment shall be maintained and properly tuned in accordance with manufacture’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper conditions prior to operation. 	<p>Significant and Unavoidable</p>

Impact	Mitigation Measure(s)	Residual Impact
	<ul style="list-style-type: none"> ▪ Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s number shall also be visible to ensure compliance with applicable regulations. <p><i>AQ-2 Implement Measures to Reduce Operational Emissions</i></p> <p>Prior to discretionary approval by the City of Ukiah for development projects subject to CEQA review (i.e., non-exempt projects), a screening assessment shall be performed by the City using the screening criteria from the 2017 BAAQMD CEQA Air Quality Guidelines. If the project exceeds the screening size by land use type, the project applicant shall prepare and submit a technical assessment to the City for review and approval, which evaluates potential project-related operational air quality impacts. The evaluation shall be prepared in conformance with BAAQMD methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the BAAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:</p> <ul style="list-style-type: none"> ▪ For site-specific development that requires refrigerated vehicles, the planning documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers, to reduce idling time and emissions. ▪ Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use. ▪ Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 California Code of Regulations Chapter 10 Section 2485). ▪ Provide changing/shower facilities as specified in Section A5.106.4.3 of the CalGreen Code (Nonresidential Voluntary Measures). ▪ Provide bicycle parking facilities pursuant to Section A4.106.9 (Residential Voluntary Measures) of the CalGreen Code. ▪ Provide preferential parking spaces for low-emitting, fuel-efficient, and carpool/van vehicles per Section A5.106.5.1 of the CalGreen Code (Nonresidential Voluntary Measures). 	

Impact	Mitigation Measure(s)	Residual Impact
	<ul style="list-style-type: none"> ▪ Provide facilities to support electric charging stations pursuant to Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of the CalGreen Code. ▪ Applicant-provided appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers) shall be Energy Star–certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star–certified or equivalent appliances shall be verified by Building & Safety during plan check. ▪ Applicants for future development projects along existing and planned transit routes shall coordinate with the City and County to ensure that bus pad and shelter improvements are incorporated, as appropriate. 	
<p>Impact AQ-3. Construction activities for individual projects facilitated by Ukiah 2040 could expose sensitive receptors to substantial pollutant concentrations; however, impacts would be less than significant with mitigation.</p>	<p><i>AQ-3 Conduct Construction Health Risk Assessment</i></p> <p>For individual projects (excluding accessory dwelling units, single-family residences, and duplexes) where construction activities would occur within 1,000 feet of sensitive receptors, would last longer than two months, and would not utilize Tier 4 and/or alternative fuel construction equipment, the project applicant shall prepare a construction health risk assessment (HRA) prior to project approval. The HRA shall determine potential risk and compare the risk to the following BAAQMD thresholds:</p> <ul style="list-style-type: none"> ▪ Non-compliance with Qualified Community Risk Reduction Plan; ▪ Increased cancer risk of > 10.0 in a million; ▪ Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or ▪ Ambient PM_{2.5} increase of > 0.3 µg/m³ annual average <p>If risk exceeds the thresholds, measures such as requiring the use of Tier 4 and/or alternative fuel construction equipment shall be incorporated to reduce the risk to appropriate levels.</p>	<p>Less than Significant with Mitigation</p>
<p>Impact AQ-4. Development facilitated by Ukiah 2040 would not create objectionable odors that could adversely affect a substantial number of people and impacts would be less than significant.</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Biological Resources</p>		
<p>Impact BIO-1. Development facilitated by the project would have the potential to modify habitat that could affect special-status species during construction and operation. Implementation of federal, state, and local regulations and policies, as well as Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4 would ensure riparian</p>	<p><i>BIO-1: Recommended Policy for Biological Resource Assessment</i></p> <p>The City shall implement the following policy into Ukiah 2040:</p> <p>Policy ENV-4.9: Biological Resource Assessment. The City shall require that new development proposed in or adjacent to ecologically sensitive areas, to</p>	<p>Less than Significant with Mitigation</p>

Impact	Mitigation Measure(s)	Residual Impact
<p>habitat and wetlands are not significantly impacted. Impacts would be less than significant with mitigation.</p>	<p>complete a site-specific biological resource assessment prepared by a qualified biologist that establishes the existing resources present.</p> <p><i>BIO-2: Pre-Construction Bird Surveys, Avoidance, and Notification</i></p> <p>For construction activities initiated during the bird nesting season (February 1 – September 15), involving removal of vegetation, abandoned structures, man-made features, or other nesting bird habitat, a pre-construction nesting bird survey shall be conducted no more than 14 days prior to initiation of ground disturbance and vegetation removal. The nesting bird pre-construction survey shall be conducted on foot and shall include a buffer around the construction site at a distance determined by a qualified biologist. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in the Mendocino Region. If nests are found, an avoidance buffer shall be determined by the biologist dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site. The buffer shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s) shall be prepared by a qualified biologist and shall be submitted to the City prior to the commencement of construction activities.</p> <p>Project site plans shall include a statement acknowledging compliance with the federal MBTA and California Fish and Game Code that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to September 15, and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.</p> <p><i>BIO-3: Roosting Bat Surveys and Avoidance Prior to Removal</i></p> <p>Prior to tree and structure removal, a qualified biologist shall conduct a focused survey of all trees and structures to be removed or impacted by construction activities to determine whether active roosts of special-status bats are present on site. Tree or structure removal shall be planned for either the spring or the fall, and timed to ensure both suitable conditions for the detection of bats and adequate time for tree and/or structure removal to occur during seasonal periods of bat</p>	

Impact	Mitigation Measure(s)	Residual Impact
	<p>activity exclusive of the breeding season, as described below. Trees and/or structures containing suitable potential bat roost habitat features shall be clearly marked or identified. If no bat roosts are found, the results of the survey will be documented and submitted to the City within 30 days of the survey, after which no further action will be required.</p> <p>If day roosts are present, the biologist shall prepare a site-specific roosting bat protection plan to be implemented by the contractor following the City’s approval. The plan shall incorporate the following guidance as appropriate:</p> <ul style="list-style-type: none"> ▪ When possible, removal of trees/structures identified as suitable roosting habitat shall be conducted during seasonal periods of bat activity, including the following: <ul style="list-style-type: none"> ▪ Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than 0.5 inch of rainfall within 24 hours occurs. ▪ Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than 0.5 inch of rainfall within 24 hours occurs. ▪ If a tree/structure must be removed during the breeding season and is identified as potentially containing a colonial maternity roost, then a qualified biologist shall conduct acoustic emergence surveys or implement other appropriate methods to further evaluate if the roost is an active maternity roost. Under the biologist’s guidance, the contractor shall implement measures similar to or exceeding the following: <ul style="list-style-type: none"> ▪ If it is determined that the roost is not an active maternity roost, then the roost may be removed in accordance with the other requirements of this measure. ▪ If it is found that an active maternity roost of a colonial roosting species is present, the roost shall not be disturbed during the breeding season (April 15 to August 31). ▪ Tree removal procedures shall be implemented using a two-step tree removal process. This method is conducted over two consecutive days and works by creating noise and vibration by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery) on day one. The noise and vibration disturbance, together with the visible alteration of the tree, is very effective in causing bats that emerge nightly to feed to not return to the roost that night. The remainder of the tree is removed on day two. 	

Impact	Mitigation Measure(s)	Residual Impact
	<ul style="list-style-type: none"> ▪ Prior to the demolition of vacant structures within the project site, a qualified biologist shall conduct a focused habitat assessment of all structures to be demolished. The habitat assessment shall be conducted enough in advance to ensure the commencement of building demolition can be scheduled during seasonal periods of bat activity (see above), if required. If no signs of day roosting activity are observed, no further actions will be required. If bats or signs of day roosting by bats are observed, a qualified biologist will prepare specific recommendations such as partial dismantling to cause bats to abandon the roost, or humane eviction, both to be conducted during seasonal periods of bat activity, if required. <p>If the qualified biologist determines a roost is used by a large number of bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultation with CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500-foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed. Once it has been determined that the roost is clear of bats, the roost shall be removed immediately.</p> <p><i>BIO-4: Bird Safe Design</i></p> <p>Development shall incorporate bird-friendly building materials and design features, including but not limited to the following:</p> <ul style="list-style-type: none"> ▪ There are no “see through” passageways or corners. ▪ Outside lighting is appropriately shielded and directed to minimize attraction to night migrating or nocturnal birds. ▪ Interior lighting is turned off at night if not in use and designed to minimize light escaping through windows during night operation. ▪ Landscaping is designed without features known to increase collisions. <p>The City shall review and approve the bird-friendly building materials and design features prior to project approval.</p>	
<p>Impact BIO-2. Development facilitated by the project could adversely impact riparian habitat or other sensitive natural communities during construction and/or operation. Implementation of federal, state, and local regulations and policies, as well as Mitigation Measure BIO-1 would ensure riparian habitat and wetlands are</p>	<p>Mitigation Measure BIO-1</p>	<p>Less than Significant with Mitigation</p>

Impact	Mitigation Measure(s)	Residual Impact
not significantly impacted. Impacts would be less than significant with mitigation.		
Impact BIO-3. Development facilitated by the project would avoid impacts to wildlife movement corridors by conserving natural areas, as directed by proposed policies and would minimize impacts to wildlife movement through implementation of Mitigation Measure BIO-1, BIO-2, BIO-3, and BIO-4. Impacts would be less than significant with mitigation.	Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4	Less than Significant with Mitigation
Impact BIO-4. Development facilitated by the project would conform with applicable local policies protecting biological resources and impacts would be less than significant.	None required.	Less than Significant
Impact BIO-5. Implementation of 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. No impact would occur.	None required.	No Impact
Cultural Resources		
Impact CUL-1. Development facilitated by the project would have the potential to impact historical resources. Existing Ukiah City Code and CEQA regulations, in addition to proposed Ukiah 2040 policies and mitigation would reduce impacts to historic resources. Nonetheless, impacts would be significant and unavoidable.	<p><i>CUL-1 Historical Resources Study Program</i></p> <p>The City shall require project applicants for discretionary projects to investigate the potential to impact historical resources. For a project involving a property that contains buildings structures, objects, sites, landscape/site plans, or other features that are 50 years of age or older, a historical resources study shall be conducted to determine if the project would demolish or otherwise alter the characteristics that make a historical resource eligible for inclusion in the CRHR. The study shall, at a minimum, be conducted by a qualified professional meeting the Secretary of the Interior’s (SOI) Professional Qualifications Standard (PQS) for architectural history (NPS 1983). The study shall include a pedestrian survey of the project site and background research including a records search at the Northwest Information Center (NWIC), building permit research, and/or research with the local historical society(ies). The subject property(ies) and/or structures shall be evaluated for federal (as applicable), and state significance on California Department of Parks and Recreation 523 series forms, included as an appendix to the study.</p> <p>If historical impacts are identified, the study shall include recommendations to avoid or reduce impacts on historical resources and the project sponsor shall</p>	Significant and Unavoidable

Impact	Mitigation Measure(s)	Residual Impact
	<p>implement the recommendations or conduct additional environmental review. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the implementing agency for review.</p> <p>Efforts shall be made to the greatest extent practical to ensure that the relocation, rehabilitation, or alteration of the resource is consistent with the Secretary of the Interior’s Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR Section 15126.4(b)(1)). Application of the Standards shall be overseen by a qualified architectural historian or historic architect meeting the PQS. In conjunction with any development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the implementing agency for review and concurrence.</p> <p>If significant historical resources are identified on a development site and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures may include documentation of the historical resource in the form of a Historic American Building Survey (HABS) report. The report shall comply with the Secretary of the Interior’s Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the PQS and submitted to the implementing agency prior to issuance of any permits for demolition or alteration of the historical resource. Copies of the report shall be provided to a local library and/or other appropriate repositories.</p>	
<p>Impact CUL-2. Development facilitated by the project would have the potential to impact archaeological resources. Impacts would be less than significant with mitigation.</p>	<p><i>CUL-2 Archaeological Resources Study Program</i></p> <p>The City shall require project applicants for discretionary projects to investigate the potential to disturb archaeological resources. If preliminary reconnaissance suggests that cultural resources may exist, a Phase I cultural resources study shall be performed by a qualified professional meeting the Secretary of the Interior’s (SOI) Professional Qualifications Standard (PQS) for archaeology (NPS 1983). A Phase I cultural resources study shall include a pedestrian survey of the project site</p>	<p>Less than Significant with Mitigation</p>

Impact	Mitigation Measure(s)	Residual Impact
	<p>and sufficient background research and, as necessary, field sampling to determine whether archaeological resources may be present. Archival research shall include a records search at the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search with the Native American Heritage Commission (NAHC), and coordination with Native American tribes listed by the NAHC. The Phase I technical report documenting the study shall include recommendations to avoid or reduce impacts on archaeological resources, such as establishing environmentally-sensitive areas excluded from project activities, archaeological and/or Native American monitoring, or redesign of the project to avoid known cultural resources. The project sponsor shall implement the recommendations prior to and during construction.</p>	
<p>Impact CUL-3. Ground-disturbing activities associated with development facilitated by the project could result in damage to or destruction of human burials. However, compliance with existing regulations on human remains would ensure less than significant impacts.</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Greenhouse Gas Emissions</p>		
<p>Impact GHG-1. Development facilitated by Ukiah 2040 would make progress towards achieving State goals but would not necessarily meet State 2030 or 2045 goals. Mitigation Measures GHG-1 and GHG-2 would result in implementation of CEQA GHG thresholds and a CAP update; however, development facilitated by Ukiah 2040 would not meet the 2030 or 2045 goals until the CAP is updated and adopted. this impact would be significant and unavoidable.</p>	<p><i>GHG-1 Adopt and Implement a CEQA GHG Emissions Threshold</i> The City shall include and implement a new 2040 General Plan policy under the Environment and Sustainability Element to prepare, adopt, and implement a CEQA GHG Emissions threshold of significance. The City shall adopt the CEQA GHG Emissions threshold of significance by Fall 2024 for use in future CEQA GHG emissions analyses through 2030. In addition, upon completion of future CAP updates and as necessary, the City shall update the CEQA GHG Emissions threshold of significance and Ukiah CEQA GHG Checklist to be consistent with each CAP update.</p> <p><i>GHG-2 Update Ukiah CAP to the State’s 2030 and 2045 GHG Emissions Goals</i> The City shall update the Ukiah CAP by Fall 2024 to outline how Ukiah will meet the State’s 2030 goal of 40 percent below 1990 emissions levels and 2045 goal of carbon neutrality. Implementation measures in the updated CAP to achieve the 2030 and 2045 goals may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> ▪ Develop and adopt Zero Net Energy requirements for new and remodeled residential and non-residential development; ▪ Develop and adopt a building electrification ordinance for existing and proposed structures; ▪ Expand charging infrastructure and parking for electric vehicles; 	<p>Significant and Unavoidable</p>

Impact	Mitigation Measure(s)	Residual Impact
	<ul style="list-style-type: none"> ▪ Implement carbon sequestration by expanding the urban forest, participating in soil-based or compost application sequestration initiatives, supporting regional open space protection, and/or incentivizing rooftop gardens; and ▪ Implement policies and measures included in the California 2017 Climate Change Scoping Plan, such as mobile source strategies for increasing clean transit options and zero emissions vehicles by providing electric vehicle charging stations. 	
Land Use and Planning		
<p>Impact LU-1. Implementation of the project would maintain orderly development in the planning area and would not physically divide an established community. Impacts would be less than significant.</p>	None required.	Less than Significant
<p>Impact LU-2. Implementation of the project would be generally consistent with applicable land use plans, policies, or regulations adopted to avoid or mitigate environmental effects. Impacts would be less than significant.</p>	None required.	Less than Significant
Noise		
<p>Impact NOI-1. Construction of individual projects facilitated by Ukiah 2040 would temporarily increase noise levels, potentially affecting nearby noise-sensitive land uses. Development facilitated by the project would introduce new on-site noise sources and would contribute to increases in traffic noise. The continued regulation of on-site noise, consistent with the Ukiah City Code and implementation of proposed Ukiah 2040 policies would minimize disturbance to adjacent land uses. However, construction noise and traffic noise may still exceed noise standards and impacts would be significant and unavoidable.</p>	<p><i>NOI-1 Construction Noise Reduction Measures</i></p> <p>The following measures to minimize exposure to construction noise shall be included as standard conditions of approval for applicable projects involving construction:</p> <ul style="list-style-type: none"> ▪ Mufflers. During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards. ▪ Stationary Equipment. All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers. ▪ Equipment Staging Areas. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers. ▪ Smart Back-up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and 	Significant and Unavoidable

Impact	Mitigation Measure(s)	Residual Impact
	<p>replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.</p> <ul style="list-style-type: none"> ▪ Signage. For the duration of construction, the applicant or contractor shall post a sign in a construction zone that includes contact information for any individual who desires to file a noise complaint. ▪ Temporary Noise Barriers. Erect temporary noise barriers, where feasible, when construction noise is predicted to exceed the acceptable standards (e.g., 80 dBA Leq at residential receivers during the daytime) and when the anticipated construction duration is greater than is typical (e.g., two years or greater). Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. If a sound blanket is used, barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class (STC) 32 or higher. 	
<p>Impact NOI-2. Development facilitated by the project could temporarily generate groundborne vibration during construction, potentially affecting nearby land uses. Operation of future development would not result in substantial vibration or groundborne noise. Impacts would less than significant with mitigation.</p>	<p><i>NOI-2 Construction Vibration Control Plan</i></p> <p>Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed FTA architectural damage thresholds (e.g., 0.12 in/sec PPV for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, and static rollers as opposed to vibratory rollers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.</p>	<p>Less than Significant with Mitigation</p>
<p>Impact NOI-3. Development facilitated by the project would not result in significantly increased airport and airstrip activity, since the Ukiah Municipal Airport would not serve travelers or industry. The continued regulation of airport noise consistent with state and federal</p>	<p>None required.</p>	<p>Less than Significant</p>

Impact	Mitigation Measure(s)	Residual Impact
<p>regulations as well as the implementation of proposed policies in Ukiah 2040 and the Ukiah Municipal Airport Land Use Compatibility Plan would minimize disturbance to people residing or working within proximity of the Ukiah Municipal Airport. Impacts would be less than significant.</p>		
<p>Population and Housing</p>		
<p>Impact POP-1. Implementation of the project would facilitate the construction of new housing in Ukiah and would increase population growth. However, the project is intended to accommodate and plan for population growth and includes policies to manage growth and development. Therefore, impacts would be less than significant.</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact POP-2. Implementation of the project would not result in the displacement of substantial numbers of housing or people. The project would facilitate the development of new housing in accordance with state and local housing requirements, while preserving existing residential neighborhoods. Impacts would be less than significant.</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Public Services and Recreation</p>		
<p>Impact PSR-1. Development facilitated by the project would result in an increase to the city’s population. The estimated population increase would increase demand for fire and police protection services and potentially create the need for new or altered police, fire, or other service facilities. The timing, intensity, and location of potential new facilities is unknown at this time, but new development would require additional CEQA review and compliance with existing building and zoning codes. Ukiah 2040 policies would ensure that police and fire services staffing and facilities are maintained at a level which accommodates for sustained population growth. Therefore, impacts to police and fire services associated with Ukiah 2040 would be less than significant.</p>	<p>None required.</p>	<p>Less than Significant</p>

Impact	Mitigation Measure(s)	Residual Impact
<p>Impact PSR-2. Development facilitated by the project would result in an increase in population of school-aged children. Population increase would increase demand for school services and potentially create the need for new school facilities. Compliance with Ukiah 2040 policies would reduce impacts to school facilities. The timing, intensity, and location of potential new facilities is unknown at this time, but new development would require additional CEQA review and compliance with existing building and zoning codes. Therefore, impacts to schools associated with Ukiah 2040 would be less than significant.</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact PSR-3. Development facilitated by the project would result in an increase to population, which could increase the use of existing parks and recreational facilities, and thus reduce the city’s parkland to population ratio. However, Ukiah 2040 policies would also result in additional recreational facilities. The timing, intensity, and location of potential new facilities is unknown at this time, but new development would require additional CEQA review and compliance with existing building and zoning codes. Therefore, impacts to park facilities associated with Ukiah 2040 would be less than significant.</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact PSR-4. Development facilitated by the project would result in an increase to population, which could increase demand for existing public facilities such as libraries. The timing, intensity, and location of potential new facilities is unknown at this time, but new development would require additional CEQA review and compliance with existing building and zoning codes. Therefore, impacts to libraries associated with Ukiah 2040 would be less than significant.</p>	<p>None required.</p>	<p>Less than Significant</p>

Impact	Mitigation Measure(s)	Residual Impact
Transportation		
Impact TRA-1. The project would not conflict with a program, plan, ordinance or policy addressing the circulation system and impacts would be less than significant.	None required.	Less than Significant
Impact TRA-2. The project would provide a diversity of land uses superior to countywide averages and would thus be anticipated to generate VMT at lower rates than countywide averages. The project would not conflict with or be inconsistent with CEQA Guidelines 15064.3(B) and impacts would be less than significant.	None required.	Less than Significant
Impact TRA-3. The project would not substantially increase hazards due to a geometric design feature and impacts would be less than significant.	None required.	Less than Significant
Impact TRA-4. The project would not result in inadequate emergency access and impacts would be less than significant.	None required.	Less than Significant
Tribal Cultural Resources		
Impact TCR-1. Development facilitated by the project may involve excavation, which has the potential to impact previously unidentified tribal cultural resources. However, with adherence to existing CEQA regulations and proposed Ukiah 2040 policies, impacts on tribal cultural resources would be less than significant with mitigation.	<p><i>TCR-1: Avoidance of Tribal Cultural Resources</i></p> <p>When feasible, development facilitated by the project shall be designed to avoid known tribal cultural resources. Any tribal cultural resource within 60 feet of planned construction activities shall be protected by establishing an Environmentally Sensitive Area (ESA) that would be fenced, or otherwise protected to ensure avoidance. The feasibility of avoidance of tribal cultural resources shall be determined by the City and applicants in consultation with local California Native American tribe(s).</p> <p><i>TCR-2: Unanticipated Discovery</i></p> <p>If previously unidentified tribal cultural resources are encountered during project implementation, altering the materials and their stratigraphic context shall be avoided and work shall halt immediately. Project personnel shall not collect, move, or disturb cultural resources. A representative from a locally-affiliated Native American Tribe shall be contacted to evaluate the resource and prepare a tribal cultural resources plan identifying methods necessary to protect the resource, in consultation with the City.</p>	Less than Significant with Mitigation

Impact	Mitigation Measure(s)	Residual Impact
Utilities and Services Systems		
<p>Impact U-1. Development facilitated by the project would increase demand for water, wastewater, electric power, natural gas, telecommunications, and stormwater drainage facilities. However, Adherence to Ukiah 2040 policies would facilitate efficient energy use, sustainable and renewable energy, and safe and resilient utility and infrastructure systems that would lessen the need for new or expanded facilities. Impacts would be less than significant.</p>	None required.	Less than Significant
<p>Impact U-2. Development facilitated by the project would increase water demand; however, the City has sufficient water supply to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.</p>	None required.	Less than Significant
<p>Impact U-3. Development facilitated by the project would increase demand for wastewater treatment. The timing, intensity, and location of an expansion of wastewater treatment facilities is unknown at this time, but an expansion would require additional CEQA review and compliance with existing building and zoning codes. As such, impacts related to expansion of wastewater treatment facilities as a result of Ukiah 2040 would be less than significant.</p>	None required.	Less than Significant
<p>Impact U-4. Development facilitated by the project would increase the volume of solid waste generated in Ukiah. However, Ukiah 2040 contains policies to increase recycling and comply with federal, State, and local management reduction regulations. Therefore, impacts would be less than significant.</p>	None required.	Less than Significant
Wildfire		
<p>Impact WFR-1. Buildout of the project could result in new development in Very High FHSZs. However, existing local and state regulations, and Ukiah 2040 proposed policies address emergency planning, management, access, and education; as well as enforce maintaining an</p>	None required.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
<p>emergency management plan. These regulations and proposed policies would address issues related to access and emergency response and the project would not impair an emergency response plan or emergency evacuation plan. Impacts would be less than significant.</p>		
<p>Impact WFR-2. The project envisions potential future development on sites that are in or near moderate, high, and very high FHSZs. Development facilitated by the project would expose project occupants and structures to wildfire risks for sites located in or near SRAs or very high FHSZs. Wildfire risk would be less than significant with mitigation.</p>	<p><i>WFR-1 Construction Wildfire Risk Reduction</i></p> <p>The City shall require the following measures during project construction:</p> <ol style="list-style-type: none"> 1. Construction activities with potential to ignite wildfires shall be prohibited during red-flag warnings issued by the National Weather Service for the site. Example activities include welding and grinding outside of enclosed buildings. 2. Fire extinguishers shall be available onsite during project construction. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher. 3. Construction equipment powered by internal combustion engines shall be equipped with spark arresters. The spark arresters shall be maintained pursuant to manufacturer recommendations to ensure adequate performance. <p>At the City’s discretion, additional wildfire risk reduction requirements may be required during construction. The City shall review and approve the project-specific methods to be employed prior to building permit approval.</p> <p><i>WFR-2 Project Design Wildfire Risk Reduction</i></p> <p>Prior to finalizing site plans, proposed structure locations shall, to the extent feasible given site constraints, be located outside of known landslide-susceptible areas and located at least 50 feet from sloped hillsides. Project landscape plans shall be encouraged to include fire-resistant vegetation native to Mendocino County and/or the local microclimate of the site and prohibit the use of fire-prone species especially non-native, invasive species. Should the project meet the above criteria, no additional measures are necessary. Should the location be within a known landslide area or within 50 feet of a sloped hillside, structural engineering features shall be incorporated into the design of the structure to reduce the risk of damage to the structure from post-fire slope instability resulting in landslides or flooding. These features shall be recommended by a qualified engineer and approved by the City prior to the building permit approval.</p>	<p>Less than Significant with Mitigation</p>

Impact	Mitigation Measure(s)	Residual Impact
Paleontological Resources		
<p>Impact PAL-1. Development facilitated by the project has the potential to impact paleontological resources. Impacts would be less than significant with mitigation.</p>	<p><i>PAL-1 Retention of Qualified Professional Paleontologist</i> The City shall implement the following policy into Ukiah 2040: Prior to initial ground disturbance in areas underlain by high sensitivity geologic units (i.e., Quaternary terrace deposits and Plio-Pleistocene sedimentary rocks), the City shall require the project applicant retain a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP) (2010), to determine the project’s potential to significantly impact paleontological resources according to SVP (2010) standards. If necessary, the Qualified Professional Paleontologist shall recommend mitigation measures to reduce potential impacts to paleontological resources to a less than significant level.</p>	<p>Less than Significant with Mitigation</p>