

4.10 Public Services and Recreation

This section summarizes the public services, including fire and police protection, public schools, and public facilities including parks that serve the Planning Area and analyzes the impacts on public services and recreation due to the project.

4.10.1 Setting

a. Fire Services

The Ukiah Valley Fire Authority (UVFA) provides fire protection and emergency medical response services to approximately 90 square miles in and around Ukiah containing a population of approximately 30,000. UVFA service area contains historic downtown buildings, county governmental buildings, Mendocino Community College, Dharma Realm Buddhist University, a regional hospital, and all residential and commercial developments within Ukiah. UVFA is also responsible for the lower half of Lake Mendocino, including the Coyote Dam, expansive wildland urban interface areas, the Ukiah Municipal Airport, US 101, and State Route 253.

The California Department of Forestry and Fire Protection (Cal Fire) is responsible for fire protection of the forested areas in the hills west of the city. Cal Fire's Mendocino Unit is stationed in Ukiah at 2690 North State Street (Ukiah 2020).

Staffing, Facilities and Equipment

UVFA is staffed by 19 full-time safety employees (Fire Chief, 3 Division Chiefs, 6 Captains, 6 Engineers and 3 Firefighters), one full-time administrative-clerical employee, and up to 25 dedicated volunteer firefighters, including a Volunteer Division Chief (Ukiah 2020). UVFA maintains four fire stations. Each station is staffed daily with at least two crews consisting of two or more personnel. Available equipment includes Type I Engines that are best suited for structural fires and Type II/III Engines that are best suited for the Wildland Interface.

b. Police Services

The City of Ukiah Police Department (UPD) provides law enforcement and dispatch services from a single station located at 300 Seminary Avenue. In 2020, UPD authorized 34 sworn personnel (Ukiah 2020). In 2018, UPD made 945 misdemeanor arrests, 427 felony arrests, 125 Driving Under the Influence arrests, and issued 875 traffic citations. In general, UPD handled over 70 calls for service per day. Except for vehicle theft and arson, crimes have been in decline from 2016 to 2018 (Ukiah 2020).

c. Schools

Both the City of Ukiah and Ukiah Planning Area are served by the Ukiah Unified School District (UUSD), which operates all public schools in the area, including the following:

- Four preschools, three in the city and one in the Planning Area
- Six elementary schools, four in the city and two in the Planning Area
- Two middle schools, one in the city and one in the Planning Area

- Two high schools (Ukiah High School and South Valley High), both in the city
- One adult school (Ukiah Adult School), in the city

In addition to the UUSD schools, there are four private preschools, four charter schools, and a private religious school in the city. There are two higher education institutions in the Planning Area:

- Mendocino College, a community college is north of the city.
- Dharma Realm Buddhist University, which is part of the City of Ten Thousand Buddhas, is in neighboring Talmage.

Prior to March 2020 (beginning of COVID-19 pandemic), UUSD was projecting a slight increase in enrollment for the 2020-21 school year at approximately 6,040 students from preschool to 12th grade. However, actual 2020-21 enrollment was lower, at only 5,938 students, with mostly in the primary grades containing fewer students than budgeted. UUSD projects a decrease of approximately 58 students for the 2021-22 school year resulting in an estimated enrollment of 5,938 students across the entire district (Ukiah Unified School District 2021). As of the 2018-19 school year, the student to teacher ratio within for UUSD is roughly 18 students for every one teacher (Education Data Partnership 2022).

d. Parks and Recreation

According to the California Department of Finance (DOF) Ukiah has a population of 16,080 people (DOF 2021). The City of Ukiah operates approximately 260 acres of parkland, recreational areas, and city facilities that function as community gathering places. Additionally, Mendocino County operates an 80-acre open space park in the city. Considering the parks operated by both the City of Ukiah and Mendocino County, residents of Ukiah have a service ratio of approximately 16.2 acres per 1,000 residents (DOF 2021, Ukiah 2020). A summary of park and recreation areas in Ukiah is provided in Table 4.10-1.

Table 4.10-1 Parks and Recreation Facilities

Name	Description
Alex Rorabaugh Recreation Center	The 14-acre Alex Rorabaugh Recreation Center includes a meeting room available to the public and a gymnasium
Alex R. Thomas Plaza	Alex R. Thomas Plaza is a 0.8-acre gathering space with benches, public restrooms, a pavilion, and amphitheater. Facilities are available to rent for the public.
Gardner Park	Gardner Park is a 0.2-acre park with picnic tables.
Giorno Park/Anton Stadium/Lions Field	Giorno Park/Anton Stadium/Lions Field is a 12-acre complex with softball/baseball diamonds and public restrooms.
Rail Trail	Rail Trail provides two miles of easily accessible and safe alternate modes of transportation for bicycle and pedestrian traffic through downtown Ukiah.
Grace Hudson Park "Wild Gardens"	Grace Hudson Park "Wild Gardens" is located just north of the Grace Hudson Museum & Sun House and recently underwent a transformation into an outdoor art and education space. The wild Gardens feature native plant gardens with exhibits and art that educates about the local environment and how Pomo Indians managed this landscape.
Low Gap Park	Low Gap Park is an 80-acre open space park located in the western hills of Ukiah. The park includes a one-acre off-leash dog park, a picnic area with tables and barbecues, tennis courts, an archery range, horseshoe pits, a disc golf course, and public restrooms. Low Gap Park is operated by Mendocino County.

Name	Description
McGarvey Park	McGarvey Park is approximately one acre and features benches.
Oak Manor Park	Oak Manor Park is a four-acre park with playground equipment, picnic tables, barbecues, reservable group areas, and tennis courts.
Oak Street Pocket Park	Oak Street Pocket Park is home of the Veteran's Garden that provides veterans a space to heal and find camaraderie among other veterans along with healthy food. The park is located on the 900 block of Oak Street between Cypress Avenue and Low Gap Road. A walking trail connects pedestrians between Oak and Bush Streets.
Observatory Park	Observatory Park was opened to the public in March 2014. The 2.5-acre park features a historical observatory, walking labyrinth, and Petanque courts. Events within the observatory encourage children and adults to explore space and learn about the solar system. Family- friendly events include Bounce to the Stars, docent tours, and Open Skies for the amateur astronomer to explore the night sky.
Orchard Park	Orchard Park is a 0.25-acre park with playground equipment and picnic tables.
Riverside Park	Riverside Park is a 38-acre open space park featuring open grass areas, picnic tables, benches, walking access to the Russian River, and birding opportunities.
Todd Grove Park	Todd Grove Park is a 16-acre park with playground equipment, picnic tables, barbecues, reservable group areas, and volleyball courts. Located in Todd Grove Park, the Ukiah Municipal Swimming Pools include diving board, concessions, public restrooms, changing rooms, showers, benches, and picnic tables. Swimming facilities are open to the public from early June through mid-August each year.
The Ukiah Civic Center	The Ukiah Civic Center is a 2.5-acre complex with an open space park for recreation or picnicking, benches, and shade areas.
The Ukiah Municipal Golf Course	The Ukiah Municipal Golf Course is a city-owned 152-acre facility with an 18-hole course, pro shop, and snack bar.
The Ukiah Skate Park	The Ukiah Skate Park is a 0.6-acre skate park with public restrooms and benches.
The Ukiah Sports Complex	The Ukiah Sports Complex is a 10-acre site featuring playground equipment, picnic tables, softball/baseball diamonds, public restrooms, and stands. The Sports Complex also hosts youth soccer, ultimate frisbee, and rugby.
The Ukiah Valley Conference Center	The Ukiah Valley Conference Center is a city-owned facility that features meeting rooms, public restrooms, and shops
Vinewood Park	Vinewood Park is a 4.7-acre park featuring playground equipment, picnic tables, barbecues, reservable group areas, and a basketball court.

Source: City of Ukiah 2020

The City also offers several recreation programs. The City of Ukiah Community Services Department (Parks and Recreation divisions) seeks to involve all ages and interests. The Department offers a variety of classes under topics such as pet training, dance, music, art, and health and fitness. In 2019, Ukiah Parks and Recreation Department offered sports leagues for ping pong, tennis, soccer, baseball, softball, and pickleball. Additionally, the Department takes suggestions from residents and holds specialized classes based on public input. These classes include topics such as Cardiopulmonary resuscitation (CPR) training, babysitting training for teens, life coaching, and women's groups (Ukiah 2020).

e. Library Services

Ukiah’s library services are provided by Mendocino County. The Ukiah Branch Library, located at 105 North Main Street, provides public computers, free Wi-Fi, curbside book pickup, printing and copy services, special events, and video game and board games to the residents of Ukiah. In 2021, Mendocino County Library was primarily funded through sale and other taxes (Mendocino County 2021).

4.10.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations pertaining to public services that are applicable to this analysis. Applicable State and local regulations are described below.

b. State Regulations

California Fire and Building Code

The State of California provides minimum standards for building design through the California Building Code (CBC), which is in Part 2 of Title 24, California Building Standards Code, of the California Code of Regulations (CCR). The CBC is based on the International Building Code but has been amended for California conditions. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local building officials for compliance with the CBC. Typical fire safety requirements of the CBC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Code of Regulations

The CCR, Title 5 Education Code, governs all aspects of education within the State. California State Assembly Bill (AB) 2926 – School Facilities Act of 1986 – was enacted by the State of California in 1986 and added to the California Government Code (Section 65995). It authorizes school districts to collect development fees, based on demonstrated need, and generate revenue for school districts for capital acquisitions and improvements. It also established that the maximum fees which may be collected under this, and any other school fee authorization are \$1.50 per square foot (\$1.50/ft²) for residential development and \$0.25/ft² for commercial and industrial development. AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 et seq. of the Government code. Under this statute, payment of statutory fees by developers serves as total mitigation under CEQA to satisfy the impact of development on school facilities. However, subsequent legislative actions have alternatively expanded and contracted the limits placed on school fees by AB 2926.

California Senate Bill 50

As part of the further refinement of the legislation enacted under AB 2926, the passage of SB 50 in 1998 defined the Needs Analysis process in government Code Sections 65995.5-65998. Under the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing

school capacity because of development. SB 50 generally provides for a 50/50 State and local school facilities match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether State funding is available; whether the school district is eligible for State funding; and whether the school district meets certain additional criteria involving bonding capacity, year-round schools, and the percentage of moveable classrooms in use.

California Government Code sections 65995-65998 sets forth provisions to implement SB 50. Specifically, in accordance with section 65995(h), the payment of statutory fees is “deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities.” The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Pursuant to Government Code section 65995(i), “A State or local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in section 56021 or 56073 on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized pursuant to this section or pursuant to section 65995.5 or 65995.7, as applicable.”

California Education Code section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.

State Public Park Preservation Act (California Public Resource Code Section 5400 – 5409)

The State Public Park Preservation Act is the primary instrument for protecting and preserving parkland in California. Under the Act, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This ensures a no net loss of parkland and facilities.

Quimby Act (California Government Code Section 66477)

The Quimby Act allows cities and counties to adopt park dedication standards/ordinances requiring developers to set aside land, donate conservation easements, or pay fees towards parkland when property is subdivided.

c. Local Regulations

The City does not currently have certain public services goals, such as a parks to person ratio goal or response time goals for the UVFA and the UPD.

Ukiah City Code

Ukiah City Code Sections 1965 through 2002 identifies parks within the City limits and contains regulations for City parks pertaining to hours of use, camping, fires, parking, trash and refuse, animals, alcohol consumption, music, special events, prohibited uses, etc.

Chapter 1 section 8403 and section 8404 of Ukiah’s City Code outlines the city’s formula to calculate required park land designation for new residential subdivision development and the payment of a development fee in lieu of park land designation, respectively. Any money collected in lieu of park land designation is used for the purpose of providing park or recreational facilities reasonably related to serving the subdivision by way of the purchase of necessary land or, if the City Council deems that there is sufficient land available for the subdivision, for improving such land for park and recreational purposes.

4.10.3 Impact Analysis

a. Significance Thresholds and Methodology

According to Appendix G of the *CEQA Guidelines*, impacts related to public services and recreation from implementation of the project would be significant if it would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other objectives for any of the public services:
 - a. Fire protection;
 - b. Police protection;
 - c. Schools;
 - d. Parks; or
 - e. Other public facilities;
2. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
3. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

In terms of Threshold 1e regarding impacts on “other public facilities,” such facilities include libraries and other public utility infrastructure. Impacts related to libraries are discussed in this section under Impact PS-4. Impacts related to public stormwater facilities are addressed in Section 4.16.4, *Hydrology and Water Quality*, and impacts related to public wastewater, water, and solid waste facilities are discussed in Section 4.13, *Utilities and Service Systems*.

b. Project Impacts and Mitigation Measures

Threshold 1a:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?
Threshold 1b:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

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.

As a result of annexation, Ukiah 2040 would physically expand the service area of both the UVFA and UPD. Additionally, implementation of the project would result in additional growth. This EIR identifies a maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. The following estimate of population growth is a conservative estimate based on the maximum buildout scenario. The development of approximately 2,350 additional residential units, which is based on the maximum buildout scenario could add approximately 5,640 residents by the year 2040 (see Section 4.9, *Population and Housing*). The UVFA has a current service ratio of 1.2 personnel to 1,000 residents. With the addition of 5,640 residents the service ratio of the UVFA would fall to 0.87 personnel to 1,000 residents. The UPD currently employs 34 authorized sworn personnel and has a current service ratio 2.1 officers to 1,000 residents. With the addition of 5,640 residents the service ratio of the UPD would fall to 1.5 officers to 1,000 residents.

The UPD will continue to coordinate with Mendocino County Sherriff's Office on joint operations and services according to proposed Policy PFS 9.3 of Ukiah 2040, as seen below. Furthermore, the incremental contribution to demand for increased UVFA protection services from implementation of the project would be offset by payment of proportionate property taxes and sales taxes to the City of Ukiah by developers and the addition of new residents. Taxes to the City's General Fund would support the City's budget for protection services. The addition of staffing or purchase of additional equipment would not result in a physical impact on the environment; however, buildout and annexation of the project could result in the need for new or expanded facilities for both the UVFA and UPD.

The following goals and policies from Ukiah 2040 would reduce impacts to police and fire protection:

Goal PFS-9: To maintain effective, fast, and dependable fire protection and emergency medical response in Ukiah.

Policy PFS 9.1: Emergency Medical Services. The City shall coordinate emergency medical services between agencies servicing the city.

Policy PFS 9.2: Fire Prevention. The City shall require all new development to include provisions for onsite fire suppression measures and/or management of surrounding vegetation to provide minimum clearance between structures and vegetation.

Policy PFS 9.3: Interagency Coordination. The City shall coordinate with Cal Fire and the Ukiah Valley Fire Authority regarding the fire protection and wildfire safety standards.

Goal PFS-10: To provide high-quality public safety and crime reduction services to maintain a safe and secure community.

Policy PFS-10.1: Police Staffing. The City shall prioritize the maintenance of Police Department staffing levels in line with community needs.

Policy PFS-10.2: Interagency Coordination. The City shall coordinate with the Mendocino County Sherriff's Office on joint operations and services.

Policy PFS-10.3: Community Policing Strategies. The City shall promote community policing strategies that strengthen trust and collaboration with the residents of Ukiah, including those of all races, ethnicities, and cultural backgrounds, and ensure public safety through meaningful cooperation and problem-solving techniques.

Policy PFS-10.4: School Safety. The City shall collaborate with the Ukiah Unified School District to enhance school security and student, teacher, and administrator safety.

Policy PFS-10.5: Public Safety Communications. The City shall use a variety of communication methods (e.g., social media, text messaging, television and radio alerts, website postings) to communicate and inform residents and businesses about crimes, investigations, and emergencies.

The proposed Ukiah 2040 policies, shown above, would ensure that police and fire services staffing and facilities are maintained at a level which accommodates for sustained population growth. Specifically, proposed Policies PSF-10.1 through PSF-10.2 would ensure that the city will prioritize maintaining Police Department staffing levels in line with community needs as the UPD's service area grows as well as promoting coordination with Mendocino County Sherriff's Office. Proposed Policies PFS-9.1 through PFS-9.3 would require on-site fire suppression measures and coordination of emergency services, including Cal Fire to maintain effective, fast, and dependable fire protection and emergency medical response in Ukiah.

Nonetheless, Ukiah 2040 could potentially result in the need for new or expanded facilities for both the UVFA and UPD. Because the scope of this analysis is limited to the existing City limits and Annexation Areas where buildout is anticipated to occur, it is expected that new facilities would be located within infill or previously developed areas. As discussed in Section 4.9, *Population and Housing*, one purpose of Ukiah 2040 is to direct future development in such a way to minimize the impacts of growth by emphasizing the intensification and reuse of already developed areas and redevelopment to infill areas, thus minimizing pressure to develop the remaining open space in the city and directing growth.

Future fire and police facilities could be located within the City’s proposed sphere of influence (SOI) or larger Planning Area but would require adherence to all applicable building and zoning codes and additional CEQA review to analyze project and location specific impacts. Overall, it is anticipated that many of the impacts identified in this EIR related to construction of new facilities (e.g., impacts on cultural and biological resources) would also apply to development of new future fire and police facilities. However, it is not possible to identify the specific nature, extent, and significance of physical impacts on the environment that could result from the construction and operation of future fire and police facilities without knowing the size and nature of the facility, or its location. For example, new future fire and police facilities could feasibly be housed in an existing building, which would have much less of a physical impact on the environment than the construction of a new facility. As such, impacts associated with implementation of Ukiah 2040 to police and fire services would be less than significant.

Mitigation Measures

No additional mitigation measures beyond those identified in the EIR would be required.

Significance After Mitigation

Impacts would be less than significant.

Threshold 1c: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

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.

A student generation rate is not available for the UUSD. However, for the purpose of this analysis, a student generation rate was estimated based on the number of existing school-aged children and the number of existing housing units. The current number of students in Ukiah is 5,909 and there are 6,955 housing units in the city. Therefore, a reasonable student generation rate for the City is 0.85 students per housing unit.¹ This EIR identifies a maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth would be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. The following estimate of additional residences is a conservative estimate based on the maximum buildout scenario. The project could facilitate the development of approximately 2,350 residential units in the maximum buildout scenario. Therefore, assuming full project buildout, the project could add approximately 2,000 new students to Ukiah.² These additional students would increase enrollment in schools in the

¹ Calculation: 5,909 students / 6,955 housing units = 0.85 students per housing unit

² Calculation: 0.85 students per housing unit * 2,350 new housing units = 1,997 students or approximately 2,000 new students

City of Ukiah and Annexation Areas potentially requiring the construction of new or expansion of existing school facilities.

The Public Facilities and Services Element of the Ukiah 2040 includes proposed goals and policies specific to education and providing school facilities for the City. Relevant goals and policies are listed below.

Goal PFS-13: To ensure high-quality educational institutions for all community members that foster diversity and educational attainment.

Policy PFS-13.1: Consideration of Impacts. The City shall consider potential impacts on the Ukiah Unified School District during the review of new development projects.

Policy PFS-13.2: Planning for Future Growth. The City shall collaborate with Ukiah Unified School District in its long-range planning efforts to ensure the adequacy of school facilities to serve new development.

Policy PFS-13.3: School Siting Coordination. The City shall coordinate with Ukiah Unified School District on the future location of schools in relation to transportation and land use plans and seek to avoid traffic impacts and facilitate joint use of community parks and other public facilities by schools.

As discussed in Section 4.9, *Population and Housing*, one purpose of Ukiah 2040 is to direct future development in such a way to minimize the impacts of growth by emphasizing the intensification and reuse of already developed areas and redevelopment to infill areas, thus minimizing pressure to develop the remaining open space in the city and directing growth.

Like the discussion regarding police and fire services facilities described above, future new school facilities could be located within the City's proposed SOI or larger Planning Area. However, it is not possible to identify the specific nature, extent, and significance of physical impacts on the environment that could result from the construction and operation of future school facilities without knowing the size and nature of the facility, or its location. It is anticipated that construction of new facilities would result in similar physical impacts discussed throughout this EIR, but impacts could also be reduced depending on location and intensity. For example, schools could be expanded, which would have much less of a physical impact on the environment than the construction of a new facility. New facilities would require adherence to all applicable building and zoning codes, and additional CEQA review to analyze project and location specific impacts. Lastly, proposed policies in Ukiah 2040 would ensure that the City and UUSD coordinate on long range planning efforts for future growth. As such, impacts to school facilities from implementation of Ukiah 2040 would be less than significant.

Mitigation Measures

No additional mitigation measures beyond those identified in the EIR would be required.

Significance After Mitigation

Impacts would be less than significant.

- Threshold 1d:** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?
- Threshold 2:** Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- Threshold 3:** Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

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.

The City of Ukiah has a ratio of 16.2 acres of parks per 1,000 residents (DOF 2019, Ukiah 2020). This EIR identifies a maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. The following estimate of population growth is a conservative estimate based on the maximum buildout scenario. The project could add up to 5,640 persons to Ukiah's population in the maximum buildout scenario. With implementation of the project, the City of Ukiah would have a ratio of approximately 12 acres of park land per 1,000 residents. However, Ukiah 2040 would also result in additional recreation opportunities for residents in and around Ukiah.

As described in section 2, *Project Description*, a guiding principle for Ukiah 2040 is the preservation of existing open space resources while enhancing accessibility to parks and recreational amenities. The Environment and Sustainability Element and the Public Facilities, Services, and Infrastructure Element of Ukiah 2040 includes proposed goals and policies specific to maintaining park and recreational facilities. Relevant goals and policies are listed below.

Goal PFS-11: To ensure adequate community facilities.

Policy PFS- 11.1: Adequate Community Facilities. The City shall develop or identify adequate and appropriate community facilities for public meetings and cultural activities.

Policy PFS- 11.2: Joint-Use Facilities. The City shall partner with Mendocino County and the Ukiah Unified School District to provide joint-use facilities.

Goal PFS-12: To provide parks, recreational facilities, and trails for residents and visitors.

Policy PFS-12.1: Connected Park System. The City shall provide an interconnected park system that creates an urban greenbelt and links all trail systems within the City.

Policy PFS-12.2: Expansion of Recreational Amenities and Programs. The City shall expand amenities and recreational programs in parks and recreational facilities that accommodate a variety of ages and address the needs of families.

Policy PFS-12.3: Equitable Access to Parks and Recreation Facilities. The City shall establish new parks and recreation facilities to ensure all residents have access within a one-mile radius of their place of residence regardless of socio-economic status.

Policy PFS-12.4: Access for Persons with Disabilities. The City shall design all parks and recreation facilities to have adequate access for those with accessibility issues.

Policy PFS-12.5: Park Visibility. The City shall assure that all parks are visible from the public right-of-way when possible and remain clear of visual obstructions that reduce visual connections for safety concerns.

Policy PFS-12.6: Park Safety. The City Police Department shall patrol and secure parks and recreational facilities from potential crime and misuse.

Policy PFS-12.7: Great Redwood Trail – Ukiah. The City shall support the continued phased development of the Great Redwood Trail through and beyond the city limits, to connect adjoining regional trail networks.

Policy PFS-12.8: Collaborative Partnerships for Improved Services. The City shall work with Mendocino County, Ukiah schools, and other large land or facility owners to establish and maintain partnerships to improve access and maintenance to parks and recreation.

Goal ENV-1: Preserve open space land for the commercial agricultural and productive uses, the protection and use of natural resources, the enjoyment of scenic beauty and recreation, protection of tribal resources, and the protection from natural hazards. (Source: New Goal)

Policy ENV- 1.1: Landscaping Compatibility. The City shall require landscaping in new development to be compatible with preservation and restoration goals of open space management and native vegetation.

Policy ENV-1.2: Open Space Management. The City shall manage and maintain City-owned open spaces to preserve the integrity of these public spaces.

Goal ENV-4: To conserve and protect the city's natural woodlands and water resources for future generations.

Policy ENV- 4.1: Habitat Preservation. The City shall require new development to preserve and enhance natural areas that serve, or may potentially serve, as habitat for special-status species. Where preservation is not feasible, the City shall require appropriate mitigation

Policy ENV- 4.2: Trail Connectivity. The City shall identify appropriate areas for trails along the ridge line that can be connected to trails in the valley.

Policy ENV- 4.3: Interconnected Greenways. The City shall require new development to incorporate and facilitate interconnected greenways that support wildlife conservation and recreational purposes.

Policy ENV- 4.4: River and Creek Preservation. The City shall work cooperatively with the County and private landowners to develop pedestrian access along creeks flowing through the City where safe and feasible to do so and where it will not cause adverse impacts.

Implementation of Ukiah 2040 would result in an increase in population, which could increase the use of existing neighborhood and regional parks, in addition to the need for new facilities. Users of existing facilities would be required to adhere to all rules and regulations associated with parks, as regulated in Ukiah City Code Sections 1965 through 2002.

Compliance with proposed goals and policies in Ukiah 2040 would potentially result in development of new recreational opportunities including parks. Future new park facilities could be located within the City limits, proposed SOI, or larger Planning Area. However, it is not possible to identify the specific nature, extent, and significance of physical impacts on the environment that could result from the construction and operation of future park facilities without knowing the size and nature of the facility, or its location. New park facilities would require adherence to all applicable building and zoning codes, and additional CEQA review to analyze project and location specific impacts. In addition, the Ukiah City Code regulates provision of parkland concurrently with new development of residential subdivisions, which would reduce impacts. For the aforementioned reasons, impacts to park and recreation facilities as a result of implementation of Ukiah 2040 would be less than significant.

Mitigation Measures

No additional mitigation measures beyond those identified in the EIR would be required.

Significance After Mitigation

Impacts would be less than significant.

Threshold 1e: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

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.

Population increases from the project could result in increased demand for public services such as libraries. The additional demand could require the construction of new library facilities or expansion of existing library facilities. Consistent with the discussion of impacts on police fire and school facilities above, because future library facilities would be located within City limits, the City's proposed SOI, or Planning Area, many of the impacts identified in this EIR would also apply to future library facilities. Generally, library facilities would be allowed or permitted in areas containing Public land use designations. However, it is not possible to identify the specific nature, extent, and significance of physical impacts on the environment that could result from the construction and operation of a future library facility without knowing the size and nature of the facility, or its location. Regardless, new library facilities would require adherence to all applicable building and zoning codes, and additional CEQA review to analyze project and location specific impacts. Impacts to libraries from implementation of Ukiah 2040 would be less than significant.

Mitigation Measures

No additional mitigation measures beyond those identified in the EIR would be required.

Significance After Mitigation

Impacts would be less than significant.