



CITY OF FORT BRAGG

Incorporated August 5, 1889
416 North Franklin Street
Fort Bragg, California 95437
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1. PROJECT TITLE

Inland Land Use and Development Code Amendment 1-19

2. LEAD AGENCY NAME AND ADDRESS

City of Fort Bragg
416 North Franklin Street
Fort Bragg, CA 95437
707-961-2823

3. CONTACT PERSON AND PHONE NO.

Scott Perkins
Public Works Manager
Public Works Department
707-961-2823

4. PROJECT LOCATION

The Inland Land Use and Development Code (ILUDC) regulates all areas of Fort Bragg located east of Highway 1 and north of Walnut Street, that are outside the California Coastal Zone. **Figure 1 (Location Map)** illustrates the jurisdiction of the ILUDC.

5. PROJECT SPONSOR'S NAME AND ADDRESS

City of Fort Bragg
416 North Franklin Street
Fort Bragg, CA 95437
707-961-2823

6. GENERAL PLAN DESIGNATION

Central Business District (CBD), General Commercial (CG), Highway Visitor Commercial (CH), Light Industrial (IL), and Heavy Industrial (IH)

7. ZONING

Central Business District (CBD), General Commercial (CG), Highway Visitor Commercial (CH), Light Industrial (IL), and Heavy Industrial (IH)

8. DESCRIPTION OF PROJECT

The State of California has passed the Medical Marijuana Regulation and Safety Act (MMRSA, 2015) and the Adult Use of Marijuana Act (AUMA, 2016) since the City's cultivation and dispensary ordinances became effective (2009 and 2005, respectively). Each State law places various levels of regulatory responsibility on local jurisdictions. In response of the new legislation, both the Public Safety Committee and the City Council have discussed the regulation of cannabis uses in the City of Fort Bragg.

This amendment to the Municipal Code involves changes to Chapter 18, the Inland Land Use and Development Code (ILUDC). Proposed Sections 18.42.057 and 18.42.059 would apply to retail cannabis businesses (dispensaries) and delivery-only cannabis retail businesses (respectively), and changes are proposed to the land use tables of ILUDC Article 2 to specify where retail cannabis businesses are allowable with discretionary permits. The land use tables in Article 2 would also be amended to remove cannabis manufacturing as a use type. Instead, cannabis manufacturing uses will be regulated under the existing policies for manufacturing/processing use types. Changes are proposed to the definitions in Article 10, and the specific use regulations for cannabis manufacturing in Article 4 would be rescinded. A table summarizing the proposed amendments is below:

Ordinance Amendments for Cannabis Businesses	
Municipal Code Section	Proposed Change(s)
Chapter 18.22	<ul style="list-style-type: none"> ■ Revise Commercial Land Use Table 2-6 to include Cannabis Retail as a land use, and indicate its allowance in the CBD, CG and CH districts with Minor Use Permit approval and subject to the Specific Use Regulations in Chapter 18.42.057 and 9.30. ■ Revise Commercial Land Use Table 2-6 to include Cannabis Retail – Delivery Only as a land use, and indicate its allowance in CG and CH districts with Minor Use Permit approval and subject to the Specific Use Regulations in Chapter 18.42.059 and 9.30.
Chapter 18.24	<ul style="list-style-type: none"> ■ Revise Industrial Land Use Table 2-10 removing Manufacturing/processing – Cannabis as a land use type. ■ Revise Industrial Land Use Table 2-10 to include Cannabis Retail – Delivery Only as a land use, and indicate its allowance in IH and IL districts with Minor Use Permit approval, subject to the Specific Use Regulations in Chapter 18.42.059 and 9.30, and add a footnote indicating the use is only allowable as accessory to an approved cannabis business engaged in manufacturing, distribution and/or processing.
Chapter 18.42	<ul style="list-style-type: none"> ■ Add Section 18.42.057 – Cannabis Retail to provide Specific Use Regulations for retail cannabis uses. ■ Add Section 18.42.059 – Cannabis Retail – Delivery Only to provide Specific Use Regulations for delivery only retail cannabis uses. ■ Rescind Section 18.42.055 – Cannabis, Manufacturing.
Chapter 18.100	<ul style="list-style-type: none"> ■ Revise definition of Cannabis Dispensary to Cannabis Retail. ■ Add definition of Cannabis Retail – Delivery Only ■ Rescind definition of Cannabis Manufacturing. ■ Revise definitions of Wholesaling and Distribution, Manufacturing-Heavy, -Medium, and -Light to include industrial cannabis uses.

9. SURROUNDING LAND USES AND SETTING:

Citywide—the ILUDC regulates all areas of Fort Bragg outside the California Coastal Zone.

10. OTHER AGENCIES REQUIRING APPROVAL

The ILUDC Amendment does not require other agencies' approval.

PROJECT LOCATION

The project is located in the portion of Fort Bragg east of Main Street and North of Walnut Street, as shown in **Figure 1 (Location Map)**. The Inland Land Use and Development Code regulates land use, subdivisions and development for the eastern portion of the City outside the California Coastal Zone.

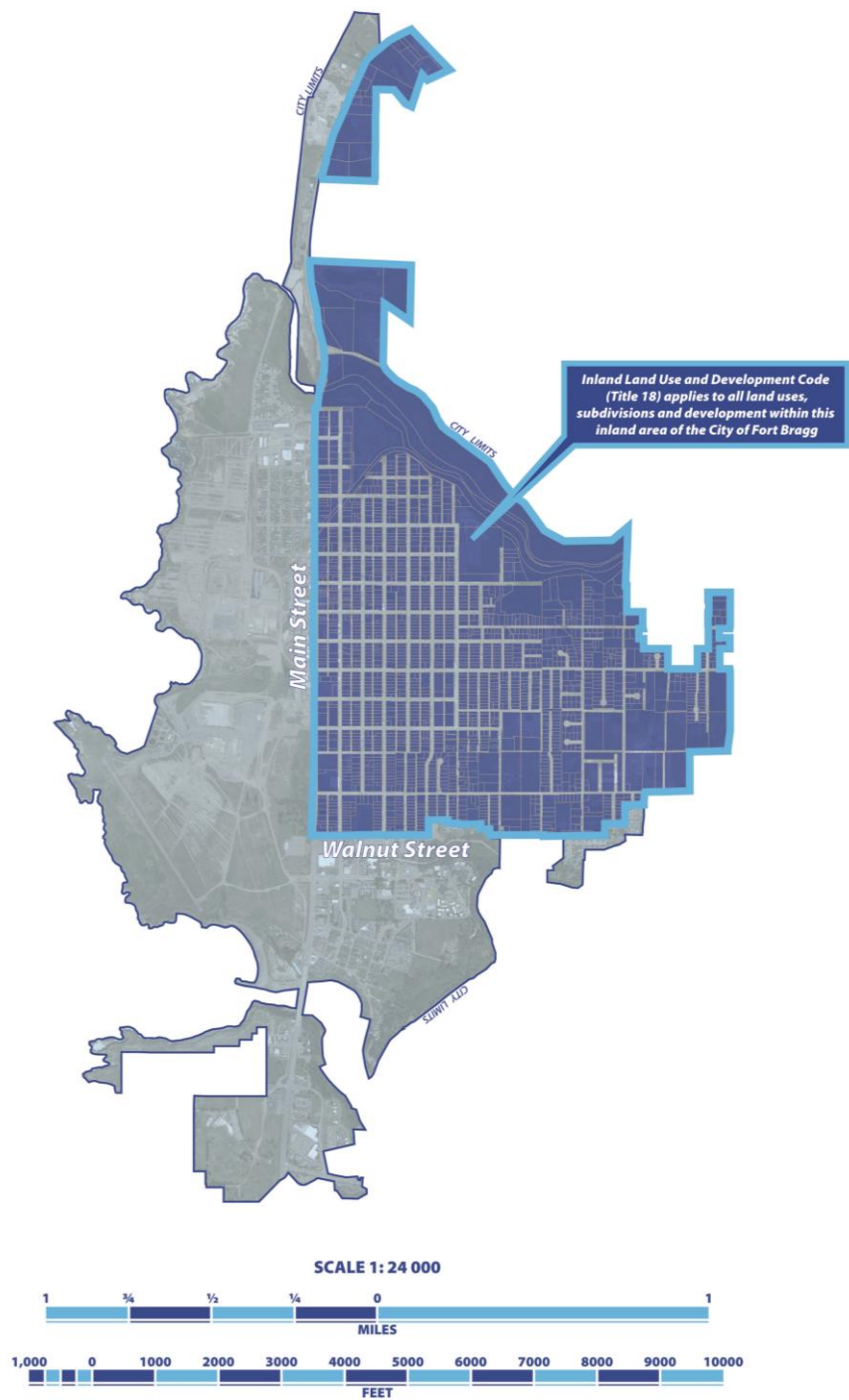


Figure 1: Location Map

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance | <input type="checkbox"/> Greenhouse Gas Emissions |

DETERMINATION

On the basis of this initial evaluation:

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

Signature

Date

Printed Name

I. Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a. Have a substantial adverse effect on a scenic vista?				✓
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c. Substantially degrade the existing visual character or quality of the site and its surroundings?				✓
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				✓

Impacts a-d: No impact

The ILUDC boundaries do not include areas that are part of a scenic vista, per the City's General Plan. There are no Caltrans-designated state scenic highways in Mendocino County; therefore, this ILUDC update will not impact these thoroughfares.

Although some scenic resources—such as open space, trees, waterways and historic buildings—are present within the ILUDC plan area, the proposed ordinance amendment does not include changes that would impact scenic resources. New businesses under the proposed ordinance could occupy existing buildings, which would have no impact on scenic vistas. The development of new structures to accommodate the cannabis businesses would be subject to a Minor Use Permit and Design Review, and during permit review, the review authority would ensure that the development would be consistent with zoning requirements for site planning and design standards (ILUDC Article 3) and the Citywide Design Guidelines to mitigate impacts to the scenic qualities of the specific development.

II. Agricultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?				✓
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				✓

Impacts a-e: *No impact*

The plan area does not include agricultural lands or forest land, nor are there agriculturally-zoned parcels in the ILUDC plan area. The California Department of Conservation Farmland Mapping and Monitoring Program designates the majority of the plan area as "Urban and Built-Up Land." Other designations include "Vacant or Disturbed Land" and "Nonagricultural or Natural Vegetation." The ILUDC amendment would not convert farmland to non-agricultural use, would not conflict with the existing zoning for forest land and would not affect any property subject to a Williamson Act contract. Due to the limited amount of agricultural resources in the City, the proposed amendment would not impact agricultural resources.

III. Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a. Conflict with or obstruct implementation of the applicable air quality plan?				✓
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				✓
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				✓
d. Expose sensitive receptors to substantial pollutant concentrations?				✓
e. Create objectionable odors affecting a substantial number of people?				✓

Impacts a-e: No impact

The Clean Air Act, as amended in 1990, is the federal law governing air quality. Its counterpart in California is the California Clean Air Act of 1988. These laws set standards for the quantity of pollutants permitted in the air. At the federal level, these are National Ambient Air Quality Standards (NAAQS). Standards have been established for six criteria pollutants linked to potential health concerns; the criteria pollutants are: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM), lead (Pb), and sulfur dioxide (SO₂).

The ILUDC boundaries are located in Mendocino County within the North Coast Air Basin (NCAB) and the plan area is under the jurisdiction of the Mendocino County Air Quality Management District (MCAQMD). The MCAQMD reviews CEQA documents and has established quantitative thresholds of significance for environmental documentation. These thresholds are consistent with those developed by the Bay Area Air Quality Management District.

Mendocino County is non-attainment for the State PM-10 standard (particulate matter less than 10 microns in size). The primary manmade sources of PM-10 pollution in the area are wood combustion (woodstoves, fireplaces, and outdoor burning), fugitive dust, automobile traffic, and industry. The MCAQMD maintains full-time monitoring equipment in the City of Fort Bragg. Development within Mendocino County must comply with all applicable provisions of the Particulate Matter Attainment Plan adopted by the Mendocino County Air Quality Management District on March 15, 2005.

The ILUDC amendment proposes to allow the establishment of new retail cannabis uses in the commercial zoning districts with an approved Minor Use Permit, and regulate cannabis manufacturing uses consistent with current manufacturing/processing use types. Future cannabis businesses would be individually subject to environmental review, and any project impacts would require mitigation at that time.

IV. Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?				✓
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				✓
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				✓
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

Impacts a-f: No impact

The majority of the ILUDC plan area is comprised of urban development; however, small patches of open space, wetlands and bishop cone forest remain in the inland plan area.

The ILUDC contains numerous policies aimed at the preservation and protection of biological resources, specifically ILUDC Article 5, Resource Protection. This amendment does not seek to modify or eliminate these regulations. These existing policies would apply to future cannabis business uses. Additionally, future cannabis businesses would be individually subject to environmental review, where any project-specific impacts would require mitigation.

No preservation, protection or adopted conservation plans apply to the ILUDC plan area.

V. Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?				✓
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?				✓
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				✓
d. Disturb any human remains, including those interred outside of formal cemeteries?				✓

Impacts a-d: *No impact*

The proposed amendment retains all of the 2014 ILUDC update regulations protecting cultural resources (specifically, Section 18.50.030 *Archaeological Resource Preservation*). The existing policies will continue to apply to new development, including any new cannabis businesses, and as a result, there will be no significant impacts to cultural resources.

VI. Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i. Rupture of known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides? 				✓
b. Result in substantial soil erosion or the loss of topsoil?				✓
c. Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				✓
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code creating substantial risks to life or property?				✓
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.				✓

Impacts a-e: *No impact*

ILUDC Chapter 18.60, Site Development Regulation, provides existing policy to ensure new development will not be located on unstable, expansive, or otherwise inadequate soils, and would not be affected by this ILUDC amendment. The California Building Code also regulates construction to protect building occupants from exposure to hazards from structures. This amendment proposes no modifications to the existing policies designed to keep geologic impacts at less than significant levels for individual projects.

VII. Greenhouse Gas Emissions

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

Impacts a-b: *No impact*

The City of Fort Bragg has adopted a greenhouse gas (GHG) emission reduction target of 7% by 2020, and has prepared a Climate Action Plan and Greenhouse Gas inventory. The proposed Green Building and Energy Conservation measures in the *Sustainability Element* of the General Plan are intended to help achieve the City's GHG reduction goal. The proposed amendment does not conflict with the Climate Action Plan or the Sustainability Element of the General Plan nor does it propose any changes to the existing policies.

VIII. Hazards and Hazardous Materials

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

Impacts a-h: No impact

There are no known locations in the ILUDC plan area on the Department of Toxic Substances Control Hazardous Waste and Substances list.

A private airstrip exists north of the City boundary, and a helipad operates at the Mendocino Coast District Hospital. Both facilities are outside of the ILUDC plan area, and no impacts will result from the proposed amendment.

The ILUDC plan area is not located within a wildland fire hazard area. It is located in an urbanized portion of the City of Fort Bragg.

The City's Emergency Operations Plan (EOP) has been developed to provide a comprehensive emergency management program for the City. It mitigates the effects of hazards and includes measures to be taken to preserve life and minimize damage, enhance response during emergencies, provide necessary assistance, and establish a recovery system, in order to return the City to its normal state of affairs in case of an emergency. The plan defines preparations and mitigations to respond to the effects of natural disasters including wildfire, technological accidents, nuclear incidents, and other major incidents/hazards. The proposed amendment has no impact on this plan.

IX. Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporat ed	Less than Significant Impact	No Impact
<i>Would the project</i>				
a. Violate any water quality standards or waste discharge requirements?				✓
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table (e.g. the production rate of a pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				✓
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				✓
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				✓
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				✓
f. Otherwise substantially degrade water quality?				✓
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				✓
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				✓
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				✓
j. Inundation by seiche, tsunami, or mudflow?				✓

Impacts a-j: No impact

Development entitled through compliance with the ILUDC would increase stormwater flows in the plan area; however, the existing ILUDC includes numerous regulations requiring stormwater infiltration, treatment and improved conveyance. The proposed amendment will have no impact on hydrology or water quality, and future projects in reliance on this amendment would be individually subject to environmental review.

The proposed amendment will not alter any existing standards designed to reduce or eliminate impacts relating to flooding, seiche, tsunami or mudflow. All new development will be subject to the existing standards and will produce no new impacts, and will be individually subject to environmental review.

X. Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project</i>				
a. Physically divide an established community?				✓
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				✓
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				✓

Impacts a-c: No impact

This amendment does not propose any physical development, and will not divide or have any other impact on an established community. Future proposals to develop cannabis business uses, in reliance on this proposed amendment, would be reviewed for consistency with the applicable plans, policies and regulations. Project-specific environmental analysis will occur during project review, and any future impacts would require mitigation as part of that project's review.

XI. Mineral Resources

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

Impacts a-b: No impact

The ILUDC plan area does not have locally important mineral resources. Therefore, development in compliance with the ILUDC would not result in the loss of known mineral resources, nor conflict with mineral resource recovery or processing facilities. The proposed revisions will have no impacts on mineral resources.

XII. Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project</i>				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				✓
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				✓
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				✓
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				✓
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				✓

Impacts a-f: No impact

Chapter 9.44 of the Fort Bragg Municipal code regulates noise in the City of Fort Bragg. The ILUDC amendment would have no impact on this chapter. However, future uses in compliance with the proposed ILUDC have the potential to create noise. Future uses would subject to the existing regulations, and should impacts be significant, project-specific mitigation would be required to reduce impacts to an insignificant level.

A private airstrip exists north of the City boundary, and a helipad operates at the Mendocino Coast District Hospital. Both facilities are outside of the ILUDC plan area, and no impacts will result from the proposed amendment.

XIII. Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project</i>				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✓
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				✓
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				✓

Impact a: *No impact*

This ILUDC amendment will not directly induce substantial population growth, as it does not propose new homes, businesses or any other physical development such as roads or other infrastructure.

This project does not propose physical development, nor does it amend the ILUDC in such a way as to displace existing housing or people.

XIV. Public Services

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Fire protection?				✓
b. Police protection?				✓
c. Schools?				✓
d. Parks?				✓
e. Other public facilities?				✓

Impacts a-e: *No impact*

The ILUDC amendment retains all regulations addressing public services in the 2014 ILUDC, which was found to have a less than significant impact on public services. The amount of development that could potentially be accommodated in the ILUDC plan area can be served by the existing unused service capacity for fire, police, schools, parks, libraries and other public service facilities. The adoption of the ILUDC amendment will have no impact on public services.

XV. Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project</i>				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✓
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓

Impacts a-b: *No impact*

The ILUDC plan area has adequate parks to serve the existing and future population. The proposed ILUDC amendment does not convert any existing park or open space area to a new use, and affects no policies requiring the development of future parks or open space areas. There will be no impacts to recreation resulting from the ILUDC amendment.

XVI. Transportation/Traffic

	Potentially Significant Impact	Less than Significant with Mitigation Incorporat ed	Less than Significant Impact	No Impact
<i>Would the project</i>				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				✓
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				✓
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				✓
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✓
e. Result in inadequate emergency access?				✓
f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				✓

Impacts a-f: No impact

The ILUDC amendment is consistent with the Inland General Plan policies pertaining, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle access, and transit. Future projects in compliance with the ILUDC will be subject to additional permit and environmental review, and would require mitigation for any impacts associated with specific projects.

The ILUDC amendment does not conflict with the *Mendocino Council of Government Regional Transportation Plan* because the ILUDC plan area does not have regional serving roads. Additionally, development pursuant to the ILUDC would not change air traffic patterns, increase air traffic levels or result in a change in location that would produce substantial safety risks.

Most of the street infrastructure in the ILUDC area is already installed. Existing streets are generally wide and interconnect in a grid pattern to facilitate emergency vehicle access. This ILUDC amendment does not alter or affect existing circulation; however, future land uses in compliance with this code would be subject to project-specific permit and environmental review, which may require mitigation measures if impacts are found to be significant.

The ILUDC amendment does not conflict with the Bicycle Master Plan, Inland General Plan, or any other plans.

XVII. Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project</i>				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				✓
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				✓
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				✓
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				✓
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				✓
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				✓
g. Comply with federal, state, and local statutes and regulations related to solid waste?				✓

Impacts a-g: No Impact

Development consistent with this amendment would increase sewer flows only marginally, due to the limited infill development opportunities. The City's sewer treatment plant can accommodate all additional flows from the inland area. Additionally, adoption of the amendment will have less than significant impacts on the need for additional stormwater conveyance facilities.

Development pursuant to the ILUDC would increase water use and solid waste generation slightly, and would place few additional demands on existing water service capacities or storage. The Inland General Plan includes additional policies and programs to reduce water use, reduce solid waste generation, and this amendment would not affect the existing policies.

XVIII. Mandatory Findings of Significance

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

Impacts: *No Impact*

Several plant and animal species listed as threatened by the state or federal government are known to exist in the area. Protection of sensitive communities and species are important for long-term ecological diversity and sustainability. The ILUDC includes regulations to protect and preserve valuable resource areas, and these existing policies are not affected by the proposed ILUDC amendment.