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BROOKTRAILS SPECIFIC PLAN

FINAL ENVIRONMENTAL IMPACT REPORT

SCH #96052002

Prepared For:
County of Mendocino

Funded By:
Brooktrails Township
community Services District

Prepared By:
EIP Associates
601 Montgomery Street, Suite 500
San Francisco, Calif. 94111

(415) 362-1500

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INTRODUCTION

PURPOSE OF EIR

This Environmental Impact Report (EIR) for the Brooktrails Township Specific Plan (the "project"), has been prepared in conformance with the provisions of the California Environmental Quality Act (CEQA) Guidelines as amended.¹ The purpose of this EIR is to provide the County of Mendocino (Lead Agency), public agencies and the public in general with detailed information about the environmental effects of implementing the Brooktrails Township Specific Plan, and to examine and institute methods of mitigating any adverse environmental impacts should the Specific Plan be adopted by the Mendocino County Board of Supervisors for implementation, and to consider alternatives to the Specific Plan as proposed. CEQA provides that public agencies should not approve projects as proposed (in this case the Brooktrails Township Specific Plan), until all feasible means available have been employed to substantially lessen the significant effects of such projects. "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time.²

The EIR will be considered at public hearings by officials of the County of Mendocino, including the Planning Commission and Board of Supervisors, and the Brooktrails Township Community Services District Board of Directors prior to any decisions being made on modifying and/or adopting the Brooktrails Township Specific Plan. Certification of the Final EIR by the County of Mendocino as complete and adequate in conformance with CEQA does not grant any approvals to the Specific Plan. The merits of the Brooktrails Township Specific Plan will be considered separately by the Mendocino County Planning Commission and Board of Supervisors after certification of the EIR.

The Brooktrails Township Specific Plan is available for public inspection and review at the Mendocino County Department of Planning and Building Services, Courthouse, Ukiah, Calif., 95482, the Brooktrails Township Community Services District office, 24860 Birch Street, Willits, Calif., 95490, and County libraries in Ukiah (105 North Main Street) and Willits (390 East Commercial Street).

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1. CEQA, California Environmental Quality Act, Statutes and Guidelines, June, 1992, published by the Governor's Office of Planning and Research, Office of Permit Assistance.
 2. Public Resources Code 21061.1.

EIR SCOPING

In October of 1995, the County of Mendocino, Department of Planning and Building Services, issued a Notice of Preparation that an EIR would be prepared for the Brooktrails Township Specific Plan. The Notice was submitted to Federal agencies (i.e., U.S. Army Corps of Engineers, U.S. Department of the Interior Geological Survey and Fish and Wildlife Service, local agencies (i.e., Mendocino County Water Agency, Mendocino County Department of Public Works, City of Willits), and the State Office of Planning and Research. The State Office of Planning and Research in turn forwarded the Notice of Preparation on to Responsible State agencies including the California Department of Fish and Game, Department of Transportation, Department of Water Resources and other State agencies. The purpose of the Notice was to allow these and other public agencies to transmit their concerns and comments on the scope and content of the EIR, focusing on specific information related to their own statutory responsibility early in the environmental review process.

In response to the Notice, letters of comment were received from the following:

Federal Agencies

Department of the Army, Corps of Engineers
San Francisco District
211 Main Street
San Francisco, CA 94105

United States Department of Commerce
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
Habitat Conservation Branch
777 Sonoma Avenue, Room 325
Santa Rosa, CA 95404

State Agencies

California Water Resources Control Board
Division of Water Rights
Environmental Review Unit
P.O. Box 2000
Sacramento, CA 95810

California Department of Conservation
Division of Mines and Geology
801 K Street, MS 12-30
Sacramento CA 95814

California Regional Water Quality
Control Board
North Coast Region
5550 "A"
Skylane Boulevard
Santa Rosa, CA 95403

California Department of
Water Resources
Division of Safety of Dams
1416 Ninth Street, P.O. Box 942836
Sacramento, CA 94236

State Department of Transportation
District 1
P.O. Box 3700
Eureka, CA 95502

Office of Planning & Research
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

Local Agencies

County of Mendocino
 Sheriff - Coroner
 Water Agency
 Department of Public Works
 Air Quality Management District
 Courthouse
 Ukiah, CA 95482

Tom Porter
 P.O. Box 178
 San Ramon, CA 94583

Betty Ball
 Mendocino County Transportation
 Coalition
 733 S. Main Street, #20
 Willits, CA 95490

Institutions and Organizations

Sierra Club
 Mendocino Lake Group
 106 West Standley Street
 Ukiah, CA 95482

California Archaeological Inventory
 Northwest Information Center
 Department of Anthropology
 Sonoma State University
 Rohnert Park, CA 94928

Willits Environmental Center
 316 Main Street
 Willits, CA 95490

In addition, an agency/public EIR scoping meeting was held at the Brooktrails Township Community Center on the morning of October 24, 1995 at 10:00 AM. The meeting was noticed by the County of Mendocino and Brooktrails Township in advance of the scoping meeting. The purpose of the scoping meeting was to allow agency representatives, organizations, individuals and the public at large to express the environmental concerns that should be addressed in the EIR. There were no attendees.

In response to letters received as a result of the Notice of Preparation, all correspondence was passed on to the EIR preparers for their consideration in preparing the Draft EIR for the Brooktrails Township Specific Plan, and it was determined that a full EIR would be prepared for the Specific Plan. Major EIR issues were determined to be the following:

- Land Use;
- Traffic and Circulation;
- Visual Quality and Community Character;
- Utilities;
- Public Services;
- Cultural Resources;
- Soils, Geology and Seismicity;
- Hydrology and Water Quality;

- Vegetation and Wildlife;
- Air Quality;
- Noise; and
- Growth Inducements.

The environmental effects of implementing the Brooktrails Township Specific Plan are analyzed under each major topic categories as listed above. The CEQA Guidelines define the effects of a project as changes from the environmental setting (existing conditions), that are attributable to the project. Short-term construction impacts as well as the long-term operational impacts are described as appropriate for each topic.

PROGRAM EIR

Because of the complex nature of the Brooktrails Township Specific Plan, this EIR presents the environmental setting and findings of impacts and mitigation measures in a consistent format for comprehension.

The Specific Plan itself is treated as the "project". The Specific Plan is addressed in a general way, similar to the way an EIR would address a City or County General Plan. This is because the Specific Plan is not specific to any single project that would be proposed for construction by the Brooktrails Township Community Services District or an individual (for example a water impoundment feature for domestic water supply or a commercial development). This is consistent with CEQA Guidelines Section 15146 which provides that the degree of specificity required in an EIR should correspond to the degree of specificity involved in the underlying activity which is described in the EIR.³

In addition, the EIR analysis of the Specific Plan addresses cumulative development. This means that buildout of the Specific Plan Area is addressed in the assessment of environmental impacts, rather than addressing only a portion of the Specific Plan. This EIR that addresses the Specific Plan is developed as a "Program" EIR under CEQA. A "Program" EIR is an EIR which is prepared on a series of actions that can be characterized as one large project that are geographically related.

3. An EIR on a construction project may be more detailed on the specific effects of the project than an EIR on the adoption of a General Plan or zoning ordinance because the effects of construction can be predicted with greater accuracy.

There are basic advantages to the Program EIR level of analysis. For example, a Program EIR provides for a more exhaustive consideration of the effects and alternatives than would be practical for an EIR on an individual action (such as an individual project comprising only a part of the Specific Plan area development). In addition, a Program EIR ensures the consideration of cumulative impacts that otherwise could be overlooked on a case-by-case basis, avoids duplicative reconsideration of basic policy issues, and allows the Lead Agency under CEQA (the County of Mendocino), to consider broad policy alternatives and area wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts. Subsequent activities in the program, for example new access roads, may be later examined in the light of the Program EIR in order to provide additional environmental documentation.

STANDARD FOR ADEQUACY

Section 15151 of the CEQA Guidelines specifies that an EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Where a particular project effect is too speculative for evaluation, discussion of the effect is ended. What is desired is completeness and a good faith effort at full disclosure.

SIGNIFICANT EFFECT ON THE ENVIRONMENT

In accordance with Section 15143 of the CEQA Guidelines, this EIR focuses on the significant effects on the environment. Each major topic (i.e., Hydrology, Vegetation and Wildlife), provides criteria for evaluating whether an environmental impact is significant or insignificant. As explained in Section 15002 (g) of the CEQA Guidelines, a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project.

The definition of impact using terms such as "beneficial" or "insignificant" is not defined in the CEQA Guidelines, but for purposes of this EIR a beneficial environmental impact is one in which an environmental condition is enhanced or improved, while an insignificant environmental impact is one in which there is no long or short-term significant adverse change in environmental conditions.

Determining that a mitigation measure reduces an impact's significant level to a level of insignificance

rests with understanding the criteria for determining a significant impact. If the criteria for determining a significant impact is not met, the impact is considered insignificant. For one or more significant unavoidable impacts that cannot be substantially mitigated, the Lead Agency (County of Mendocino), under CEQA must prepare a Statement of Overriding Considerations in which the Lead Agency sets forth its views in writing on the ultimate balancing of the merits of approving a project despite the environmental impacts which may result from project implementation. This process requires consideration of the decision maker (the Lead Agency), to balance the benefits of a proposed project against its potential unavoidable environmental impacts in determining whether to approve a project. The Statement is preserved in the record of project approval (if a project is approved), and is prepared after the Final EIR has been completed and certified as complete and adequate.

In the discussion of environmental impacts and mitigation measures in this EIR, a code is used to convey information regarding the significance of impacts before and after mitigation. The codes and their meanings are as follows:

- (S) = Significant adverse impact
- (PS) = Potentially Significant adverse impact
- (B) = Beneficial impact
- (I) = Insignificant impact

In Section 3, *Environmental Setting, Impacts and Mitigation Measures*, the impacts for each environmental topic are numbered, with one of the above codes following the discussion of impact. In addition, each mitigation measure for an environmental impact is similarly numbered with one of the above codes following the discussion of a mitigation measure. Cumulative impacts resulting from growth, inclusive of regional growth, that would affect the Township are specified in each technical section of the EIR where such cumulative impacts have been identified.

MITIGATION MONITORING AND REPORTING

The California Environmental Quality Act (CEQA) requires public agencies to adopt mitigation monitoring and reporting programs, for changes to a project to mitigate or avoid significant effects on the environment.

CEQA requires that a monitoring and reporting program be adopted "When making findings required by subdivision (a) of Section 21081 (Public Resources Code), or when adopting a (mitigated) Negative Declaration —." The monitoring and reporting program need not be a component of the EIR. The program is part of the project approval process, not necessarily part of the impact analysis process.

A Draft Mitigation Monitoring and Reporting Program has been prepared for the Specific Plan project (Appendix C). The mitigation monitoring and reporting program is intended to identify each mitigation measure for a significant environmental impact and indicate the responsible party or agency to conduct the monitoring and reporting program.

1. SUMMARY

1.1 BACKGROUND AND SPECIFIC PLAN PROJECT ORIGINATION

Brooktrails Township is an unincorporated Mendocino County community of approximately 6,000 parcels located immediately northwest of the City of Willits. Brooktrails area property has historically been used for a wide range of land uses. In the 1880s, the Brooktrails Township area was occupied by the Northwestern Lumber Company. As logging operations were completed, the land was sold to the Diamond D Ranch and served as a dude ranch. Ultimately, the land was subdivided in the 1960s into approximately 6,000 lots ranging in size from one-sixth of an acre (7,260 square feet), to 230 acres. The development was intended to be primarily for second homes, but most of the homes are occupied by year-around permanent residents.

Currently, Lake Emily and Lake Ada Rose at Brooktrails provide sufficient domestic water supply for approximately 2,000 equivalent single-family dwelling units at Brooktrails. However, as currently subdivided, approximately 4,000 residential lots would not be supplied with water from existing sources. In 1981, the Township retained a consulting team to prepare an analysis of three alternative dam sites. Eight years later, the Township initiated preparation of the Willits Creek Reservoir Project Draft Environmental Impact Report (EIR). The Willits Creek Reservoir was a proposed 2,400 acre-foot impoundment, considered by the Township sufficient in size to allow buildout of the Township.

Through the process of addressing comments on the scope and content of the EIR by various regulatory agencies and the public, the Brooktrails Township Community Services District Board of Directors recognized that a community plan was necessary to address Township development potential, how many residential units would be appropriate for Township buildout, and land use and environmental concerns to allow for a better understanding of the costs and impacts associated with the proposed Willits Creek Reservoir project. Accordingly, after several years of effort, the Brooktrails Township obtained special legislation by the State legislature through Assembly Bill No. 266, and Township voter approval,¹ authorizing the District to become the first special district in California to engage in land use planning decision-making. The Specific Plan is the result of that legislation and voter approval.

1. At the June 2, 1992 election, 69% of those voting in Brooktrails cast their ballots in favor of Measure C.

1.2 SPECIFIC PLAN PROJECT

The purpose of the Brooktrails Township Specific Plan is to serve as a comprehensive planning document for the Township as it continues to grow. It includes development goals and policies, land use regulations, a capital improvement program and an overview of financing measures. It integrates land use controls that replace the existing Development Review Board Ordinance and Interim Site Development Standards.

The Specific Plan is not intended to be a rigid framework, but provides flexibility to respond to changes over time that are consistent with the Plan goals and policies. The Specific Plan may be updated at periodic intervals, for example every five years if warranted, to reflect changes in community standards, rate of Township growth, use of natural and man-made resources, and general community concerns regarding quality of life issues.

It should be noted that Brooktrails Township is an existing community. Thus the Specific Plan does not address a new community; rather, the Specific Plan addresses refinements to the existing subdivision as new information on growth and development of the Township has become available, and responds to changing physical conditions, community concerns and governmental regulations regarding Township growth and development.

1.3 PROJECT DESCRIPTION

At buildout, and as envisioned in the Specific Plan, the Brooktrails subdivision would contain 3,815 residential units (4,000 SFRs)² supporting a resident population of about 9,919 individuals. New commercial development to augment existing commercial land uses would be expected to occur on land zoned for commercial uses, consistent with the needs and requirements of the local population. The predominant land use would remain singly-family residential with 2,817 acres devoted to Public Facilities open space. Various community services and infrastructure improvements and additions would be required to support the growing community as follows:

-
2. SFR = "equivalent single-family residential unit"; SFR is used for water consumption planning purposes. Excludes Spring Creek and Public Facility SFRs (100 SFRs for public use and 85 SFRs for the Spring Creek subdivision).
 3. Assumes 7% multifamily (6% two-family residential, 1% four-family residential - existing is 6% two-family residential and 3% four-family residential), and 93% single-family. Assumes 2.6 persons/unit, which could change over time depending on potential changes in demographic conditions. Source: 1990 census and Brooktrails Community Services District.

Water: Water supply is the most immediate constraint facing Brooktrails, with the existing system reaching capacity at around 2,000 units. Water infrastructure consists of the development of additional water sources including a new dam and 1,600 acre-foot reservoir, plus added storage and treatment facilities to augment existing storage and treatment facilities commensurate with the level of demand.

Sewer: Development beyond 2,000 units will require the expansion of sewer capacity. Sewer improvements to serve up to 4,000 units consist of one main from Brooktrails to the Willits Wastewater Treatment Plant constructed in two stages.

Circulation: Two circulation projects are anticipated for the near future. The first project involves improvements to Sherwood Road, including shoulders, turn pockets, and signals. The second project is the second access route into the Township, established by the Brooktrails Board of Directors as the number one priority among infrastructure expansions. Traffic volumes generated by development of 4,000 units would require a third access route into the Township.

Fire: The Township plans to add one new fire station, including a fire engine and water tender, before reaching the 2,000 unit level of development. Development at 4,000 units would require a second additional station plus another engine and staff car. In addition to the two new fire stations noted above, the Brooktrails Township anticipates an additional station to serve development in the vicinity of the Ells Field Airport near the northeast quadrant of the Township.

1.4 REQUIRED APPROVALS

The Specific Plan EIR must be certified as complete and adequate under CEQA by the Mendocino County Board of Supervisors prior to considering a General Plan amendment, rezoning and approving and adopting the Specific Plan. A General Plan amendment is needed to reflect the Specific Plan's greater level of specificity applying to the Township proper, while rezoning of specified commercial and multiple-residential unit parcels is called for in the Specific Plan.

1.5 AREAS OF CONTROVERSY

Several areas of potential environmental impact controversy currently affect, but are not necessarily affected by, the Brooktrails Township Specific Plan. Those issues of environmental impact controversy that are discussed in the EIR are as noted below. The issues of controversy known at this time include:

- 1) Caltrans' proposals for a U.S. 101 freeway bypass, that routes freeway traffic around rather than through the City of Willits, and the effect of the proposed bypass on circulation patterns and intersection service levels within the City of Willits. The bypass would also have importance on decisions regarding a third access route into Brooktrails Township. This subject is discussed in Section 3.1.2, Traffic and Circulation.
- 2) The timing of constructing a future Caltrans' U.S. 101 bypass around the City of willits. This project is not currently listed in the State Transportation Improvement Program (STIP), and funding for the project could be delayed in future years while congestion along U.S. 101 gets progressively worse with area growth.
- 3) Potential impacts of residential construction on steep and/or unstable slopes areas, and in geologically seismically active areas. This subject is discussed in Section 3.2.2, Soils, Geology and Seismicity.
- 4) The level of proposed development. Although the Township, through an extensive community involvement program to promote consensus regarding preparation of the Specific Plan to accommodate 4,000 equivalent single-family dwellings, this reduces potential Township buildout from 6,000 residential units as envisioned when Brooktrails was initially conceived. This issue generated some controversy, particularly with respect to individuals in the real estate community. The choice among alternatives, including buildout of Brooktrails Township as envisioned in the Specific Plan, relates to a careful balancing of the need for maintaining a community character desired by Township property owners, environmental protection and fiscal responsibility.

The alternatives studied include the following:

1. No Project (no Specific Plan)
2. Alternative Development Scenarios
 - Fixed Growth Scenario #1: 2,000 units
 - Low Growth Scenario #2: 2,500 units
 - Medium Growth Scenario #3: 3,500 to 4,000 units
 - Medium-High Growth Scenario #4: 5,000 units
 - High Growth Scenario #5: 6,000 units
3. Environmentally Superior Alternative

Other areas of controversy may include impacts on the providers of public services and utilities, pedestrian safety (especially school children), potential air quality and noise impacts, and the potential for growth inducing impacts. These subjects are discussed in the respective technical sections of this EIR.

1.6 MAJOR EIR CONCLUSIONS

The following presents the major conclusions and findings of the EIR. A table that summarizes the environmental impacts and mitigation measures as contained in the body of the EIR is provided. The description of some impacts and mitigation measures has been abbreviated consistent with the format of a summary section, and the reader is referred to the main EIR text for a complete discussion of environmental impacts and mitigation measures (refer to the numbering sequence for location). A summary description of each Specific Plan alternative studied is also provided.

Alternatives

The purpose of the discussion of alternatives is to focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of project objectives or would be more costly.

No Project

For purposes of definition, the No Specific Plan Alternative is synonymous with the description of the No Project Alternative. Alternative Development Scenario #1 described below is analogous to the No-Project (no Specific Plan) Alternative because the existing Township water supply can provide up to about 2,000 residences, and no Specific Plan would be prepared without the need for a new reservoir due to circumstances surrounding the issue of growth within Brooktrails Township.

The Township with 6,000 residential units as originally envisioned when the land was subdivided is not feasible without environmental evaluation because of the determination of need for the Specific Plan. Therefore, development not exceeding 2,000 residences is the respective limit of growth within the Township without the Specific Plan.

The No Project alternative includes maintenance of the existing environment at the 2,000 unit level as a basis for comparison of the other alternatives considered.

Alternative Development Scenarios

The Brooktrails Township Community Services District initiated the process of forming a Specific Plan Advisory Committee consisting of Brooktrails property owners. In working with the Advisory Committee, the first step was to prepare and present for review a series of potential growth scenarios for Brooktrails Township, up to and including Township buildout as originally envisioned when Brooktrails was

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.1.1 LAND USE			
3.1.1-1 Rezoning nine commercially (C-1) zoned parcels to single-family (R-1) residential use.	I	3.1.1-1 None required.	--
3.1.1-2 Rezoning two multiple-family (R-3) parcels to two-family (R-2) use and one two-family parcel to commercial use.	I	3.1.1-2	--
3.1.2-1 TRAFFIC AND CIRCULATION			
The additional development allowed under the Specific Plan would result in approximately 2,000 additional peak hour external vehicle trips and 763 additional internal vehicle trips. This represents an increase of 380 percent from 1993 levels for external trips, while internal trips are projected to increase 635 percent. These trips would result in increased congestion and safety impacts due to the increased demand on the roadway capacity.	S	3.1.2-1 The following roadway improvements will be required by build-out (4,000 equivalent dwelling units) to accommodate future traffic in and around Brooktrails. <ul style="list-style-type: none"> Sherwood Road - Shoulders and left turn lanes from U.S. 101 to Poppy Drive. Pedestrian pathway to be included along entire length. Re-design Birch Street intersection to enhance safety. Southern Access Road - Construct new 2-lane arterial between Primrose Dr. and S.R. 20 to relieve Sherwood Road. Signalize intersection with S.R. 20. Clover Road/Primrose Dr. - New signal required. Primrose Dr./Sherwood Road - New signal required. 	I

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.1.2-2 Development pursuant to the Specific Plan would increase the number of vehicles and people that would use the existing emergency exit routes which could result in a potential safety hazard to human life and property.	PS	<ul style="list-style-type: none"> • Upgrade Primrose Dr. to include shoulders, pedestrian pathways and left-turn bays. • State Route 20 - While entirely outside Brooktrails, S.R. 20 between the Southern Access Road and Main Street (U.S. 101) will need to be expanded to a 4-lane arterial by buildout. 	I
3.1.2-3 Additional residential development at Brooktrails could result in additional on-street parking, which would result in potential significant impacts to the circulation system.	PS	<p>Construct new 2-lane arterial between Primrose Dr. and S.R. 20 to relieve Sherwood Road. Signalize intersection with S.R. 20.</p> <p>Implement all of the recommendations in the Brooktrails Evacuation Plan. This includes one new all-weather route along the Meadowlark Trail in northeast Brooktrails, and a new southern access route. These corridors should be maintained to accommodate all vehicles in Brooktrails, and all residents should be notified of the evacuation route to use in the event of an emergency.</p> <p>Off-street parking requirements and on-street regulations should be enforced by the Mendocino County Sheriff's Department. The off-street requirements identified in the Specific Plan should be implemented. In addition, on-street parking bays should be provided throughout the Township where feasible.</p>	I
3.1.2-4 Build-out pursuant to the Specific Plan would generate additional vehicle trips that would contribute to cumulative traffic impacts, which would result in congestion at U.S. 101 and Sherwood Road, U.S. 101 and Commercial Street, U.S. 101 and S.R. 20 and S.R. 20 and the planned Southern Access Route.	S	<p>3.1.2-4 It is infeasible for the County of Mendocino or the Township to implement possible mitigation measures. The design and implementation of such measures would be under the jurisdiction of Caltrans.</p>	PS

PS=Potentially Significant; S=Significant; I=Insignificant; B=Beneficial

1. SUMMARY

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		Impact Significance Without Mitigation	Mitigation Measures		Impact Significance With Mitigation
3.1.3	VISUAL QUALITY				
	Collectively, buildout of the Specific Plan area would convert land parcels that currently appear semi-rural to rural in character to a suburban condition. This development would constitute a potentially significant change in visual conditions within the Township.	PS	3.1.3-1	The planning and design of projects slated for construction within the Township should conform to the goals and policies for community Design as contained within the Community Design chapter of the Specific Plan. Conformance review would occur with each development proposal and decisions under the provisions of the Community Design chapter. Conformance review would occur during the Township's design review process consisting of the Architectural Review Commission and District Architect.	PS
3.1.3-1					
3.1.4	UTILITIES				
3.1.4-1	Upgrades to existing PG&E conductors and electrical substations serving Brooktrails Township would be required from time to time to accommodate the community's electrical needs as it grows.	I	3.1.4-1	Where possible, allow for off-grid energy systems.	I
3.1.4-2	Pacific Bell would need to reinforce its cable facilities between their Willis switching station and the Township to accommodate full buildout.	I	3.1.4-2	Allow for new technologies such as satellite delivery systems and improved accommodations for digital communication.	I
3.1.5	PUBLIC SERVICES				
3.1.5-1	Police Protection				
	Township buildout could require additional Sheriff's staff and/or equipment to maintain acceptable law enforcement services.	PS	3.1.5-1	Any requirement for increased Sheriff's Department staffing would have to be determined from annual reviews on growth until the number of new residences in Brooktrails has stabilized. The Township would coordinate with the Sheriff's Department annually to assure that any mutual concerns are addressed.	I

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
Schools			
3.1.5-2	PS	Those responsible for new construction would pay a per unit impact fee in accordance with Willits Unified School District requirements, to provide a local share of funding for the necessary expansions.	I
3.1.5-3	--	Continue with the Township's recently augmented solid waste recycling program in order to minimize solid waste disposal requirements within the County.	--
Solid Waste			
3.1.5-3	--	Full buildout would increase the solid waste stream to Mendocino County solid waste management facilities. Given the time frame for Township buildout to occur, it would be speculative to compare the Township's percentage of solid waste contribution to the County total, and the impact cannot be realistically quantified.	--
3.1.6 CULTURAL RESOURCES			
3.1.6-1	PS	Construction and grading related to the widening of Sherwood Road could affect cultural resources located on site CA-MEN-383.	I
3.1.6-2	PS	Unknown cultural resources may be encountered during ground disturbance activities associated with development in the Specific Plan area.	I
3.1.6-2	PS	A qualified archaeologist would need to assess the significance of any find and develop a mitigation plan in accordance with the implementation policies of the Specific Plan that deals with cultural resources.	I

PS = Potentially Significant; S = Significant; I = Insignificant; B = Beneficial

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.2.1 SOILS, GEOLOGY AND SEISMICITY			
3.2.1-1 Grading and excavation on, or adjacent to, existing steep slopes could create or exacerbate unstable slope conditions at construction sites.	PS	3.2.1-1 Require site-specific minimal grading concepts, stability analysis, stabilization procedures and design criteria for cut slopes and fill slopes, inconclusive of geologically constrained areas.	I
3.2.1-2 Grading, excavation and construction activities would have the potential to increase erosion from building sites, and to cause subsequent deposition of particles in drainage ways, creeks or reservoirs.	PS	3.2.1-2 Require the preparation of an erosion and sediment transport control plan to meet specified objectives during design review.	I
3.2.1-3 Use of weak soils for foundation support without prior treatment could create unstable soil conditions at construction sites.	PS	3.2.1-3 Require site-specific soil suitability analysis and stabilization procedures, and design criteria for foundations according to specified objectives during design review.	I
3.2.1-4 The northeast corner of the Plan Area is subject to the damaging effects of surface rupture along traces of the Maacama fault.	S	3.2.1-4 Secure the recommendations of a site-specific fault trace location and activity level investigation to be incorporated in the design of all structures intended for human occupancy within the Earthquake Fault Zone that crosses the Township.	I
3.2.1-5 Brooktrails will be subject to damaging seismically induced groundshaking during the useful economic life of the Specific Plan.	S	3.2.1-5 During design review, require site-specific seismic-restraint criteria to be incorporated in the design of slopes, foundations and structures for projects in the Township.	I
3.2.1-6 The Specific Plan would increase the number of dwelling units in an area subject to seismic groundshaking with its attendant secondary effects of ground failure.	S	3.2.1-6 Implement mitigation measures 3.2.1-1 through 3.2.1-5. Make EIR available to interested parties.	I
3.2.2 HYDROLOGY AND WATER QUALITY			
3.2.2-1 Grading and excavation on, or adjacent to, existing steep slopes could create or exacerbate erosion conditions at construction sites and cause subsequent sedimentation in drainage ways, creeks or reservoirs.	PS	3.2.2-1 Minimize grading required for construction. Prepare an erosion and sediment transport control plan prior to construction.	I

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Impacts	Impact Significance Without Mitigation	Impact Significance With Mitigation	Mitigation Measures
3.2.3 BIOLOGICAL RESOURCES			
3.2.3-1 Residential lot development would result in the loss of trees and associated wildlife habitat.	S	S	3.2.3-1 Tree and native vegetation removal shall be minimized to the extent possible. Fire-resistant native plant landscaping shall be encouraged.
3.2.3-2 Residential lot development could result in loss or damage to sensitive plant species.	PS	I	3.2.3-2 Conduct surveys for north coast semaphore grass in May prior to development. Site structures to avoid semaphore grass.
3.2.3-3 Lot development could result in the loss of or damage to nesting birds protected under the Migratory Bird Treaty Act.	PS	I	3.2.3-3 All tree removals should take place between September 1 and February 1 if feasible.
3.2.3-4 Residential lot development could result in erosion which could cause loss or damage to aquatic species inclusive of sensitive animal species such as the red-legged frog, pond turtle, and steelhead in Lake Emily and Lake Ada Rose, and in Willits, Dutch Henry and Upp Creeks and their tributaries during construction.	PS	I	3.2.3-4 Implement erosion control programs, minimize disturbance to habitat, avoid disturbance during breeding or migration seasons.
3.2.3-5 Residential lot development could result in adverse effects to biological resources as a result of increased human presence.	PS	I	3.2.3-5 Replant unauthorized trails leading into creek channels, post fencing and signs in consultation with the California Department of Fish and Game to educate the public, and direct public access shall not be permitted except for overcrossings and carefully sited view points.
3.2.3-6 Residential lot development could interfere with wildlife movement.	PS	I	3.2.3-6 Leave natural open space in a configuration that provides corridors and linkages with natural areas outside the Township.
3.2.4 AIR QUALITY			
3.2.4-1 Construction activities would generate particulate emissions which could exceed federal and/or State ambient air quality standards.	PS	I	3.2.4-1 Implement dust suppression measures in accordance with specified EIR standards.

PS = Potentially Significant; S = Significant; I = Insignificant; B = Beneficial

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.2.4-2 New vehicle trips and wood-burning stoves installed in Township residences would generate reactive organic compounds, nitrogen dioxide and particulates which could worsen ambient ozone and particulate levels.	S	3.2.4-2 Implement specified EIR Transportation Management measures. Install only clean fuel burning Phase II catalytic fireplaces in new residential dwellings.	S
3.2.4-3 Vehicle trips associated with Township buildout would generate carbon monoxide emissions, but there would be no violations of the federal or State carbon monoxide emissions resulting from vehicular use.	I	3.2.4-3 No mitigation required.	
3.2.5 NOISE			
3.2.5-1 Construction activities would generate high noise levels on and around the locations of activity over the entire period of construction, potentially disturbing area residents.	PS	3.2.5-1 Limit construction to between the hours of 7 A.M and 6 P.M., Monday through Friday. Construction specifications should include a provision requiring adequate mufflers on trucks and other construction equipment.	I
3.2.5-2 At Township buildout, traffic noise levels at the homes closest to Sherwood Road would exceed County preferred levels and State normally acceptable levels.	PS	3.2.5-2 Install sufficient acoustic insulation in proposed residences along Sherwood Road to assure that maximum noise levels in any inhabitable room will not exceed 45 dBA.	I

PS = Potentially Significant; S = Significant; I = Insignificant; B = Beneficial

established. Five Alternative Development Scenarios were developed and presented for review and discussion, together with the criteria and considerations documenting the origin of each Scenario.⁴

The ultimate objective was for the Advisory Committee and District Board of Directors to agree on a series of Development Scenarios for testing in terms of environmental practicality, consistency with the *Proposed Goals and Objectives* of the Community Vision Focus Group Report as adopted by the Township Board of Directors, and to assess each Scenario for economic feasibility.

The following is a summary review of the potential environmental implications of initiating either of the five Alternative Development Scenarios. Potential risk of adverse environmental impact by subject area is provided to facilitate evaluation of the alternative development scenarios. Generally, order of magnitude of impact risk is provided.

Fixed Growth Scenario #1: 2,000 Units (No Specific Plan Project)

- Land Use - Scenario #1 would create the least risk of land use impact of all the development scenarios. New Development would be infill development and primarily residential in character (there could be some locally-serving commercial uses), with no discernable land use conflicts.
- Traffic and Circulation - Circulation improvements are currently warranted, including a second access road, regardless of additional development in the Township.
- Visual Quality - Of all the Alternative Development Scenarios, alternative #1 would create the least risk of altering existing visual resources or changing the semi-rural character of the Township.
- Utilities and Public Services - Additional demands would be placed on utilities and public services, but, Fixed Growth Scenario #1 would be the least intense of the development scenarios. There would be no new dam construction.
- Soils and Seismicity - Alternative #1 would afford the greatest opportunity to avoid development on steep slopes or within unstable soils, areas of high constraint to development.
- Drainage and Water Quality - Scenario #1 would generate the least increase in stormwater runoff of all the alternatives, and present the least risk to water quality.
- Vegetation and Wildlife - Scenario #1 would minimize disturbance to forest habitat because of reduced development.
- Air Quality - Scenario #1 would minimize potential air quality impacts because of the reduced development profile as compared with the other alternatives.

4. Refer to the body of the EIR text, pages 6-2 and 6-3, for a discussion of community involvement up to and including preparation of the Specific Plan. See also Chapter 2 of the Specific Plan, Section 2.4, *Basis of Specific Plan*, regarding preparation, amendment and adoption of the community Vision Statement and Preliminary Overall Goals and Objectives.

- Noise - Scenario #1 would minimize adverse noise impacts because of reduced development density and population.

Low Growth Scenario #2: 2,500 Units

- Land Use - New development would be infill development in a random lot selection pattern, and primarily residential in character, consistent with existing residential land use.
- Traffic and Circulation - Circulation improvements are currently warranted, including a second access road. Increased development over Fixed Growth Scenario #1 would create an increased need for circulation improvements.
- Visual Quality - Under Low Growth Scenario #2, there would be a low risk of altering visual resources or changing the existing community character because of scattered infill development throughout an established lotting pattern.
- Utilities and Public Services - Under Scenario #2, there would be additional demands placed on utilities and public services, but there would correspondingly be less demand than under the increased Development Scenarios #3, #4 and #5. There would be no new dam construction.
- Soils and Seismicity - Alternative #2 would afford significant opportunities to avoid development on steep slopes or within unstable soils.
- Drainage and Water Quality - Scenario #2 would provide an increase in the amount of stormwater runoff over Fixed Growth Scenario #1 because of the increased area of construction, but the increase in intensity and amount of runoff would be less than development scenarios #3, #4 and #5.
- Vegetation and Wildlife - Scenario #2 would require more disturbance to forest habitat than Fixed Growth Scenario #1 because of increased development.
- Air Quality - Alternative #2 would generate more vehicular traffic than Fixed Growth Scenario #1 because of the greater population base, potentially adversely affecting air quality due to increased vehicular, heating, cooling and fireplace emissions.
- Noise - Alternative #2 would generate more vehicular traffic and bring more people into the Township than Fixed Growth Scenario #1, increasing noise levels over what would be generated under Scenario #1.

Medium Growth Scenario #3: 3,500 to 4,000 Units

- Land Use - New development would be infill development, and primarily residential, consistent with existing land uses. At this level of development, it would be expected that most of the more easily developable lots (lots that are not steeply sloping or heavily forested), would be developed and other lots that are in high constraint areas or without sewer hookups would remain for development.
- Traffic and Circulation - Circulation improvements are currently warranted, including a second access road. Increased development above Low Growth Scenario #2 would create an increased need for circulation improvements.
- Visual Quality - Scenario #3 would pose an increased risk of altering visual resources or changing the existing community character because of increased, more dense, suburban infill development throughout an established lotting pattern.

- Utilities and Public Services - Additional demands would be placed on utilities and public services under Alternative #3, but these demands would be the less than for Alternative Development Scenarios #4 and #5. Scenario #3A at 3,500 units would require additional water for domestic use through increasing the capacity of Lake Ada Rose and/or Lake Emily in conjunction with the use of wells and conservation efforts.

Alternative #3B, at 4,000 units, would trigger a major threshold decision since Alternative #3B would involve the construction of a new minimum-size reservoir that, together with existing water supplies, could support up to 4,000 units and provide water for fish flows.
- Soils and Seismicity - Alternative #3 would afford opportunities to avoid development on steep slopes or within unstable soils.
- Drainage and Water Quality - Scenario #3 would generate an increase in the amount of stormwater runoff over Low Growth Scenario #2, but the increase in intensity and amount of runoff would be less than for Scenarios #4 and #5.
- Vegetation and Wildlife - Scenario #3 would generate more disturbance to forest habitat because of increased development as compared to Alternative Development Scenarios #1 and #2.
- Air Quality - Scenario #3 would generate more vehicular traffic than Fixed Growth Scenario #1 or Low Growth Scenario #2, potentially adversely affecting air quality.
- Noise - Scenario #3 would generate more vehicular traffic and bring more people into the Township than Fixed Growth Scenario #1 or Low Growth Scenario #2, increasing noise levels over what would be generated under Scenario #1 and #2.

Medium-High Growth Scenario #4: 5,000 Units

- Land Use - New development would be infill development, and primarily residential, consistent with existing land uses. As with Medium Growth Scenario #3, under Scenario #4 at this higher level of development potential, it would be expected that most of the more easily developable lots (lots that are not steeply sloping or heavily forested), would be developed and other lots that are in high constraint areas or without sewer hookups would remain available for development.
- Traffic and Circulation - Circulation improvements are currently warranted, including a second access road. Increased development over Medium Growth Scenario #3 would create increased need for circulation improvements. There would be increased risk of peak hour congestion under this growth scenario.
- Visual Quality - There would be a substantially increased risk of altering visual resources or changing the existing community character because of increased development under Scenario #4, even though the development would be infill development.
- Utilities and Public Services - Scenario #4 would require the construction of a new dam on Willits Creek to provide a new source of municipal water supply to enable increased development and provide water for required fish flows.
- Soils and Seismicity - Scenario #4 would afford fewer opportunities to reassemble lots into larger developable parcels in the effort to avoid development on steep slopes or within unstable soils.

- Drainage and Water Quality - Scenario #4 would provide an increase in the amount of runoff over Alternative Development Scenarios #1, #2 and #3, but would be less than full buildout of the Township. There would be an increased potential for adverse water quality impacts because of the higher level of construction and additional stormwater runoff under this alternative.
- Vegetation and Wildlife - Scenario #4 would generate increased disturbance to forest habitat because of increased development in comparison to Alternative Development Scenarios #1, #2 and #3. There would be increased risk to maintaining existing open space conditions, wetlands and riparian habitat because of the greater local population base.
- Air Quality - Scenario #4 would generate more vehicular traffic than Scenarios #1, #2 and #3. The larger population could potentially adversely affect air quality due to increased vehicular, heating, cooling and fireplace emissions.
- Noise - Scenario #4 would generate more vehicular traffic and bring more people into the Township than Scenarios #1, #2 and #3, increasing noise levels over what would be generated under either alternative of less intense development.

High Growth Scenario #5: 6,000 Units

- Land Use - New development under Scenario #5 would be infill development coinciding with the existing lotting pattern. The overall level of density and intensity of land use would be greater than all other Alternative Development Scenarios because of community buildout.
- Traffic and Circulation - Circulation improvements are currently warranted, including a second access road. Community buildout would create a correspondingly increased need for circulation improvements within the Township and possibly the City of Willits. There would be a substantially increased risk of peak hour congestion under this long-term growth scenario.
- Visual Quality - Under buildout, there would be a significantly increased risk of altering existing visual resources or changing the existing community character because of increased development, even though the development would be infill development over an existing lotting pattern. This would be because of increased density and intensity of development throughout the Township.
- Utilities and Public Services - Buildout would place additional demands on utility systems and public services. As with Medium-High Growth Scenario #4 at 5,000 units, under Scenario #5, a new dam would need to be constructed on Willits Creek to provide an additional source of domestic water supply.
- Soils and Seismicity - Scenario #5 would afford fewer opportunities to avoid development on steep slopes, areas of high constraint to development. Owners of currently unimproved lots in high constraint areas would either not be able to build because of the costs to mitigate existing conditions, or be forced to acquire whatever remaining adjacent parcels may be developable, if they continue to desire to build.
- Drainage and Water Quality - Buildout would generate an increase in the amount of stormwater runoff above all other Alternative Development Scenarios. There would be increased potential for localized flooding, erosion, sedimentation and adverse water quality impacts. The ability of the existing drainage system and local creeks to adequately handle increased stormwater runoff would need to be determined.

- **Vegetation and Wildlife** - Buildout would require increased disturbance to forest habitat because of increased development over all other Alternative Development Scenarios. There would be significantly increased risk to maintaining existing open space conditions, and increased risk of adverse impact to existing wetlands, riparian habitat and wildlife migration corridors.
- **Air Quality** - Buildout would generate more vehicular traffic than the other Alternative Development Scenarios because of the increased population. Accordingly, there would be increased risk of adversely affecting existing air quality because of vehicular, heating, cooling and fireplace emissions.
- **Noise** - Buildout would generate more vehicular traffic and bring more people into the Township than Alternatives #1, #2, #3 and #4, increasing noise levels over what would otherwise be generated under reduced development. It would be expected that under buildout conditions, traffic noise would become objectionable to area residents, particularly residents living in more hilly areas where traffic would be accelerating up steep grades generating higher engine noise.

Conclusion

Fixed Growth Scenario #1 with 2,000 residential units would provide the least risk of environmental impact. However, as explained previously, Scenario #1 is analogous to the No-Project alternative because the existing Township water supply can provide up to about 2,000 units.

The economic analysis conducted for the Alternative Development Scenarios indicated no development rights acquisition may be required under Scenario #4 at 5,000 units or Scenario #5 at 6,000 units. The economic analysis also indicated development upwards of 4,000 units under Scenario #3B would create less pressure to acquire development rights and have a lower order-of-magnitude economic impact on property values than the lower growth scenarios. Although infrastructure costs of Scenario #3B would be higher than Scenarios #1, #2 or #3A, this would be more than offset by a reduction in development rights acquisition costs.

It was concluded that the optimum community size would be Medium Growth Scenario #3B with 4,000 units. Scenario #3B was determined to provide an optimum balance between the need for environmental protection and the economic costs of expanding infrastructure and/or limiting growth.

Environmentally Superior Alternative

Of all the Alternative Development Scenarios, Low Growth Scenario #2 at 2,500 units (excludes Scenario #1 as the No Project Alternative), would appear to be the Environmentally Superior Alternative and would be most consistent with the proposed goals and objectives of the Brooktrails Township Focus Group Report recommendations.

2. PROJECT DESCRIPTION

2.1 BACKGROUND AND SPECIFIC PLAN ORIGINATION

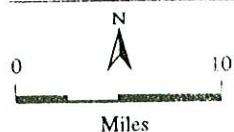
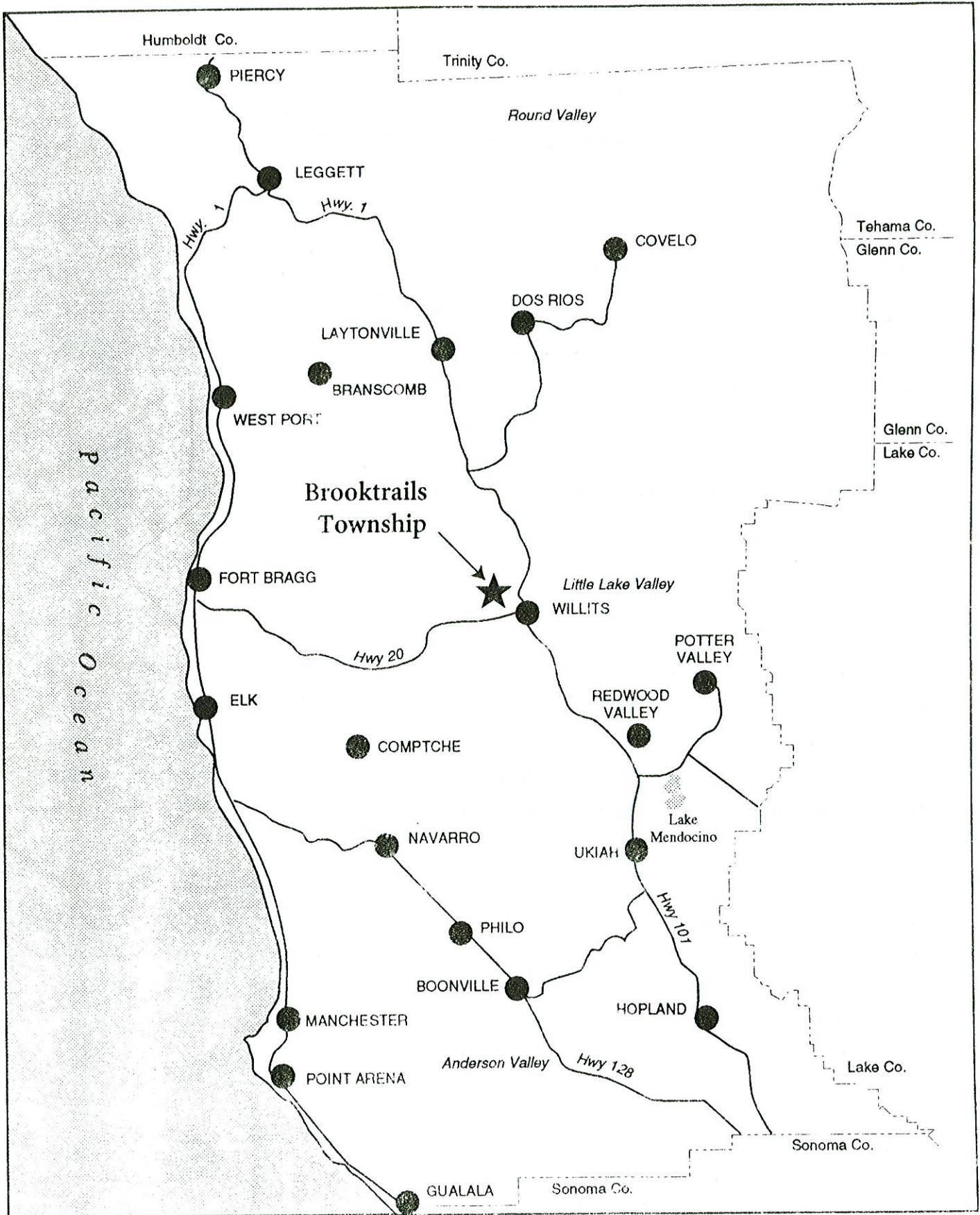
Brooktrails Township is an unincorporated Mendocino County community of approximately 6,000 parcels located immediately northwest of the City of Willits (see Figure 2-1, Regional Location Map, and Figure 2-2, Site Location Map).

Brooktrails area property has historically been used for a wide range of land uses. In the 1880s, the Brooktrails Township area was occupied by the Northwestern Lumber Company. As logging operations were completed, the land was sold to the Diamond D Ranch and served as a dude ranch. In the 1960s a developer proposed to convert the lands into a planned development and began subdividing the land. The Brooktrails Company Ltd., of Beverly Hills and New York, acquired the land in 1967.

Ultimately, the land was subdivided into 6,605 lots ranging in size from one-sixth of an acre (7,260 square feet), to 230 acres. The development was intended to be primarily for second homes; it was conceived of as a "Vacation Village" resort. This "second home" intent is acknowledged in the Housing Element of the Mendocino County General Plan (page I-64), although it is not consistent with current fact, since most of the homes are occupied by year-around permanent residents.

Currently, Lake Emily and Lake Ada Rose at Brooktrails provide sufficient domestic water supply for 2,000 equivalent single-family dwelling units at Brooktrails.¹ However, as currently subdivided, approximately 4,000 residential lots would not be supplied with water from existing sources. Over the past decade, the Brooktrails Township Community Services District (Township) has investigated ways to meet anticipated water needs for future growth. In 1981, the Township retained a consulting team to prepare an analysis of three alternative dam sites. Eight years later, the Township initiated preparation

1. Water at Brooktrails is measured according to SFRs, or Single Family Residential water usage units, which is the average water usage rate of a full-time, occupied single family residential unit. Lacking adequate historical documentation, it was thought that an additional water source would be necessary to provide for development at Brooktrails over 1,330 connections. However, on January 12, 1994, based on a technical analysis performed for the District regarding the available water supply to Brooktrails, the California Department of Health Services, Office of Drinking Water, amended Domestic Water Supply Permit No. 82-020 to allow the District to serve up to 2,000 service connections.

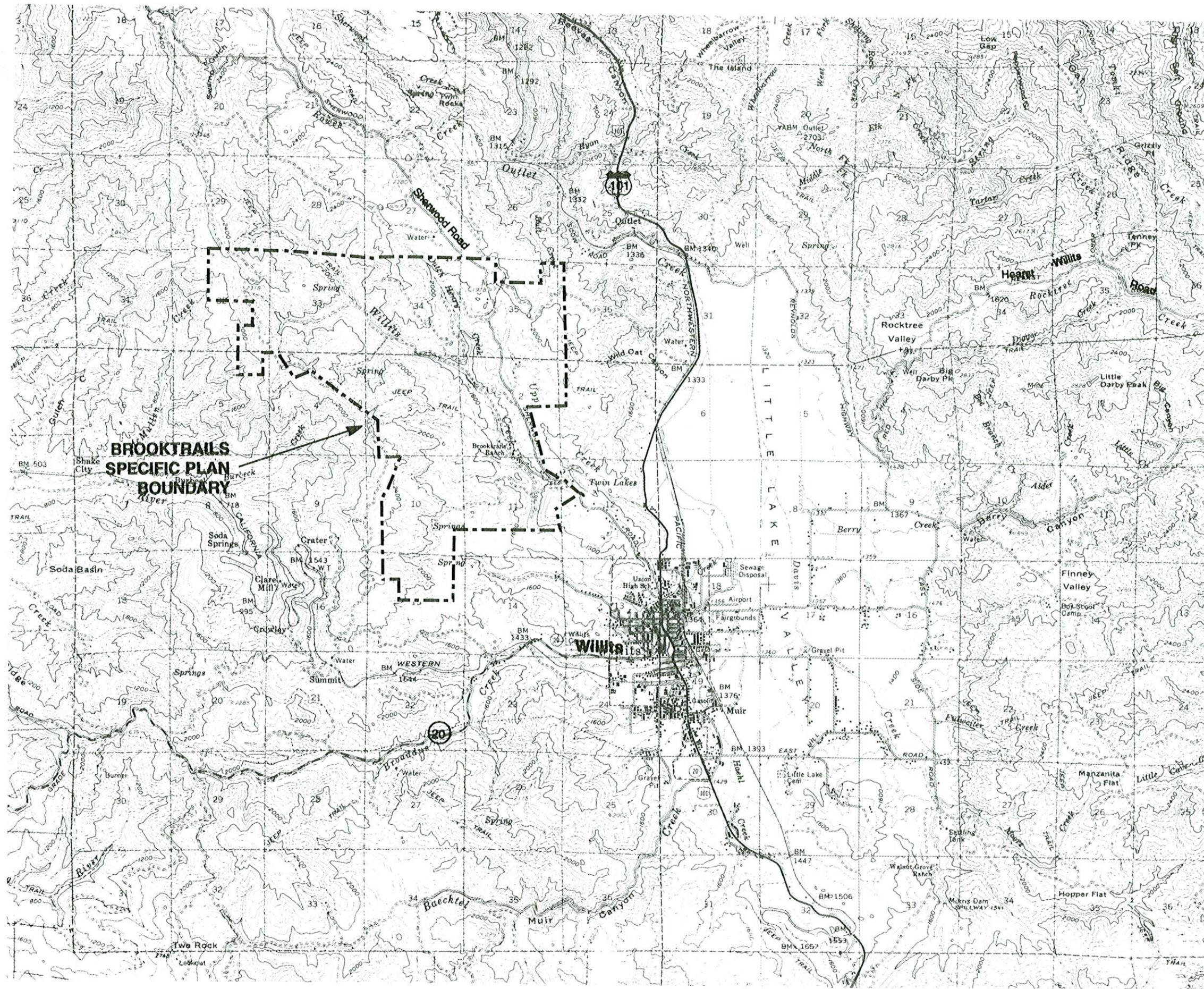


Source: EIP Associates

BROOKTRAILS TOWNSHIP SPECIFIC PLAN EIR

Figure 2.1-1
Regional Location Map





BROOKTRAILS TOWNSHIP SPECIFIC PLAN EIR
 Figure 2.1-2
 Site Location Map



of the Willits Creek Reservoir Project Draft Environmental Impact Report (EIR). The Willits Creek Reservoir was a proposed 2,400 acre-foot impoundment, considered by the Township sufficient in size to allow buildout of the Township. The Draft EIR was completed and issued for agency and public review in July, 1991. However, through the review process, given existing environmental constraints of steepness of slope, slope stability, habitat, access and other community development issues, it became apparent that the size and cost of the reservoir would ultimately depend on how many residential units would, or could, actually be constructed within the Township.

Through the process of addressing comments on the scope and content of the EIR by various regulatory agencies and the public, the Brooktrails Township Community Services District (Township) Board of Directors recognized that a community plan was necessary to address Township development potential and land use and environmental concerns to allow for a better understanding of the costs and impacts associated with the proposed Willits Creek Reservoir project. Accordingly, after several years of effort, the Brooktrails Township obtained legislation by the State legislature through Assembly Bill No. 266, and Township voter approval (69%), authorizing the District to become the first special district in California to engage in land use planning decision-making. Mendocino County Ordinance No. 3829 adopted by the Board of Supervisors on August 18, 1992, established the Brooktrails Township Community Services District as the Brooktrails Area Planning Commission (planning authority granted by the State of California as delegated through Mendocino County), and noted it was the "function and duty" of the Planning Commission to prepare a Specific Plan pursuant to Section 65450 of the California Government Code and related General Plan amendments. The Specific Plan is the result of that legislation (does not include the Spring Creek and Sylvandale subdivisions).²

2. Spring Creek and Sylvandale are both subdivisions which were annexed to the District. The District provides water service, recreation and fire protection services to the Spring Creek subdivision and recreation and fire protection services to the Sylvandale subdivision. Both subdivisions have associations and have been active in the community planning process. The residents of both subdivisions have expressed concern over the years as to the possibility that the District's efforts to provide rules and regulations for Brooktrails proper might result in unanticipated consequences in the two subdivisions where conditions are perceived by residents to be substantially different. The District Board has expressed its intent to refrain from preparing planning studies which would relate to land use and criteria by which development would proceed in the Spring Creek and Sylvandale subdivisions.

Ordinance 3829 excluded the Spring Creek and Sylvandale subdivisions from the area to be covered by the Specific Plan.

2.2 SPECIFIC PLAN PROJECT

A Specific Plan, as its name implies, is a definitive plan for the development of a specific area. The Brooktrails Township Specific Plan represents the culmination of a planning concept that first surfaced approximately four years ago, and is the result of a community planning effort conducted over approximately three years. The Specific Plan has been prepared in an attempt to address numerous issues and concerns with respect to Brooktrails Township which have arisen over the past few years, related primarily to the quality and character of new development, the sequencing of community facilities and infrastructure, environmental protection and enhancement, public safety, recreation and related issues.

Because the Township is in an unincorporated area of Mendocino County, the Specific Plan is intended to provide a bridge between the County's General Plan and future development within the Township in a more specific manner than is possible under the current Development Review Board procedures and community-wide zoning ordinance. The Specific Plan will also have implications for the financing and provision of, community services inclusive of utilities, roads, fire protection and other functions and activities.

The purpose of the Brooktrails Township Specific Plan is to serve as a comprehensive planning document for the Township as it continues to grow. It includes development goals and policies, land use regulations, a capital improvement program and an overview of financing measures.

The Specific Plan is not intended to be a rigid framework, but provides flexibility to respond to changes over time that are consistent with the Plan goals and policies. The Specific Plan may be updated at periodic intervals, for example every five years if warranted, to reflect changes in community standards, rate of Township growth, use of natural and man-made resources, and general community concerns regarding quality of life issues.

It should be noted that Brooktrails Township is an existing community. The Brooktrails subdivision is an existing subdivision that was created in the mid 1960s as described previously. Thus, the Specific Plan does not address a new community; rather, the Specific Plan addresses refinements to the existing subdivision as new information on growth and development of the Township has become available, and responds to changing physical conditions, community concerns and governmental regulations regarding Township growth and development.

2.3 PROJECT DESCRIPTION

At buildout, and as envisioned in the Specific Plan, the Brooktrails subdivision would contain 3,815 residential units (4,000 SFRs³) supporting a resident population of 9,919 individuals.⁴ New commercial development to augment existing commercial land uses would be expected to occur on land zoned for commercial uses, consistent with the needs and requirements of the local population. The predominant land use would remain singly-family residential with 2,817 acres devoted to Public Facilities open space, inclusive of greenbelt, golf course, community center Fire Department and water supply/treatment (see Section 3.1.1, *Land Use and Zoning* for additional statistical information regarding Brooktrails Township). Various community services and infrastructure improvements and additions would be required to support the growing community as follows:

Water: Water supply is the most immediate constraint facing Brooktrails, with the existing system reaching capacity at around 2,000 equivalent units. Water infrastructure consists of the development of additional water sources including a new dam and 1,600 acre-foot reservoir, plus added storage and treatment facilities to augment existing storage and treatment facilities commensurate with the level of demand. The Township's internal water distribution network already exists so, beyond maintaining the existing system, no further expansions are anticipated other than noted herein.

Sewer: Sewer improvements to serve up to 4,000 units consist of one main from Brooktrails to the Willits Wastewater Treatment Plant constructed in two stages. The first stage, an external reach from the Brooktrails metering station to the Willits Wastewater Treatment Plant, will be required at 2,000 units. The second stage, an internal reach to the metering station, would be required at around 3,000 units of development. Additional internal sewer lines would be required for the few areas of the Specific Plan area that presently lack sewer service. These are local to individual benefit areas, and could be constructed and funded through assessments specific to these areas at such time as the appropriate petitions are submitted.

3. SFR = "equivalent single-family residential unit"; SFR is used for water consumption planning purposes. Excludes Spring Creek and Public Facility SFRs (100 SFRs for public use and 85 SFRs for the Spring Creek subdivision).

4. Assumes 7% multifamily (6% two-family residential, 1% four-family residential - existing is ^5 two-family residential and 3% four-family residential), and 93% single-family. Assumes 2.6 persons/unit, which could change over time depending in potential changes in demographic conditions. Source: 1990 census and Brooktrails Community Services District.

Circulation: Two circulation projects are anticipated for the near future. The first project involves improvements to Sherwood Road, including shoulders, turn pockets, and signals. The second project is the second access route into the Township, established by the Brooktrails Board of Directors as the number one priority among infrastructure expansions. Accordingly, the second access route, connecting south from the Township to State Route 20, is assigned priority, and would be constructed as soon as the planning, engineering, and financing can be put in place.

Traffic volumes generated by development of 4,000 units would require a third access route into the Township. The Upcreek Route, connecting east to U.S. 101, is assumed to be the most likely alignment (see Section 3.1.2, *Traffic and Circulation*, for additional information regarding new access routes).

Fire: The Township plans to add one new fire station, including a fire engine and water tender, before reaching the 2,000 unit level of development. Development at 4,000 units would require a second additional station plus another engine and staff car. In addition to the two new fire stations noted above, the Brooktrails Township anticipates an additional station to serve development in the vicinity of the Ells Field Airport near the northeast quadrant of the Township, to be constructed in the near-term. Beyond serving areas of Brooktrails, the proposed Airport area station would provide back-up to the City of Willits and the Little Lake Fire District.

SCHEDULING

Historically, residential construction within the Township has varied from 15 to 100 units per year. For comparison purposes, buildout of the Specific Plan area would occur around the year 2039 if 60 units were constructed each year, or as late as 2083 if the development rate was 30 units per year. In any case, depending upon the rate of development, infrastructure projects for the Specific Plan area are expected to stretch well into the next century.

The second access route is required now for community safety, irrespective of the rate of Township development. Beyond the near-term circulation improvements, the next phase of major construction consisting of a new dam and 1,600 acre-foot reservoir at around 2,000 units is 10 to 20 years off. Though, in most cases, the new infrastructure needs are not immediate (excluding the second access route and Sherwood Road improvements), addressing the needed future infrastructure requirements now will allow time to review and establish the necessary engineering and financing programs to anticipate growing public service demands.

2.4 RELATIONSHIP TO JURISDICTION AND PLANS

General

While the Specific Plan addresses Brooktrails proper, the area to be considered for planning purposes includes those lands within and adjacent to the Township that could reasonably be expected to be influenced by growth within the Township up to and including buildout. Therefore, the implications of potential growth within the Township as relates to unincorporated lands surrounding the Township and nearby City of Willits are considered in the Specific Plan, inclusive of traffic, utilities, public services and other subject areas.

Mendocino County

This Specific Plan is structured to implement the provisions of the Mendocino County General Plan by creating a bridge between broad based General Plan policies and specific social, physical and environmental characteristics of the Brooktrails Township. The Mendocino County General Plan was adopted by the Mendocino County Board of Supervisors, as revised, on April 26, 1993, and sets forth the general guidelines for orderly growth and development within unincorporated areas of Mendocino County. It also provides direction for zoning, subdivision regulations, intensity of development, land use and the design of public facilities.

The Brooktrails Township Specific Plan is a refinement of the basic development goals and policies of the General Plan. The Brooktrails Township Specific Plan establishes more detailed and specific goals and policies for development of the Township.

City of Willits

Brooktrails Township is located approximately one mile northwest of the City of Willits, a city with a population of 5,300 residents. The City of Willits is an incorporated area of about 2.8 square miles, and is recognized in the City's General Plan as a subregional commercial and industrial center, serving a market area of about 15,000 people. The City's location along the U.S. Highway 101 growth corridor suggests that Willits is increasingly linked to the growing San Francisco Bay Area, particularly with regard to the emerging employment center in and around the City of Santa Rosa in Sonoma County.

The City of Willits General Plan revision, adopted by the Willits City Council on August 12, 1992, stresses the creation of a self-sustaining community with a balance of jobs and housing, and the retention

of a small town character which is reflected in the design of its residences, commercial buildings and public open space, in lieu of what could otherwise be perceived as a residential bedroom community. The Willits General Plan recognizes the presence of Brooktrails Township, and recognizes the potential for growth and an increased population base within the Township. Correspondingly, growth within Brooktrails Township under buildout conditions, would be expected to affect the City of Willits, particularly with respect to traffic increases, commercial/office space use, increased demands on utilities inclusive of sewage treatment. Correspondingly, the Brooktrails Township Specific Plan and EIR consider these potential impacts on the City of Willits resulting from growth within the Township, and contains features to mitigate these potential impacts.

2.5 REQUIRED APPROVALS

The Specific Plan EIR must be certified as complete and adequate under CEQA by the Mendocino County Board of Supervisors prior to considering a General Plan amendment, rezoning and approving and adopting the Specific Plan. A General Plan amendment is needed to reflect the Specific Plan's greater level of specificity applying to the Township proper, while rezoning of specified commercial and multiple-residential unit parcels is called for in the Specific Plan. In addition, Mendocino County requires that a General Plan amendment application accompany any request for rezoning.

Approval and adoption of the Brooktrails Township Specific Plan by the Board of Supervisors is required prior to the Brooktrails Township Community Services District, instituting the goals and policies as set forth in the Specific Plan, inclusive of limiting development up to 4,000 residential units, providing new infrastructure of access roads, water reservoir and related water delivery facilities to support 4,000 dwelling units, and implementing the amended Site Development Standards as contained in the Specific Plan. In addition, as noted in the *Introduction* to this EIR, separate environmental review under CEQA will be required for major infrastructure improvements.

Infrastructure projects would need to comply with Mendocino County plans and specifications for roadway/utility design. A series of permits and approvals from public agencies would be required before these project could be constructed. Individual construction projects (i.e., new residential dwellings), proposed by individuals for construction within the Township would need to comply with the Township Site Development Standards; compliance would be through design review by the Township Architectural Review Commission and District Architect.

of a small town character which is reflected in the design of its residences, commercial buildings and public open space, in lieu of what could otherwise be perceived as a residential bedroom community. The Willits General Plan recognizes the presence of Brooktrails Township, and recognizes the potential for growth and an increased population base within the Township. Correspondingly, growth within Brooktrails Township under buildout conditions, would be expected to affect the City of Willits, particularly with respect to traffic increases, commercial/office space use, increased demands on utilities inclusive of sewage treatment. Correspondingly, the Brooktrails Township Specific Plan and EIR consider these potential impacts on the City of Willits resulting from growth within the Township, and contains features to mitigate these potential impacts.

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Infrastructure projects would need to comply with Mendocino County plans and specifications for roadway/utility design. A series of permits and approvals from public agencies would be required before these project could be constructed. Individual construction projects (i.e., new residential dwellings), proposed by individuals for construction within the Township would need to comply with the Township Site Development Standards; compliance would be through design review by the Township Architectural Review Commission and District Architect.

The County of Mendocino would need to review and approve Tentative and Final Maps for individual development proposals in order to issue grading and construction permits. Any project that would propose disturbance to existing wetlands prior to site grading would require approvals from the California Department of Fish and Game and U.S. Army Corps of Engineers; there is no guarantee these approvals would be given if requested.

The rights to impound additional water with a new dam and reservoir would be required from the California Water Resources Control Board, Division of Water Rights. In addition, approvals from the California Department of Water Resources, Division of Safety of Dams would be required in order to construct the proposed new dam.

The County of Mendocino will place the entire Specific Plan area within a Specific Plan (SP) overlay combining district to highlight the fact that a specific set of goals, policies, regulations and implementation programs apply to the Specific Plan area.

3. ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

3.1 SOCIAL/CULTURAL ISSUES

3.1.1 LAND USE

3.1.1-1 INTRODUCTION

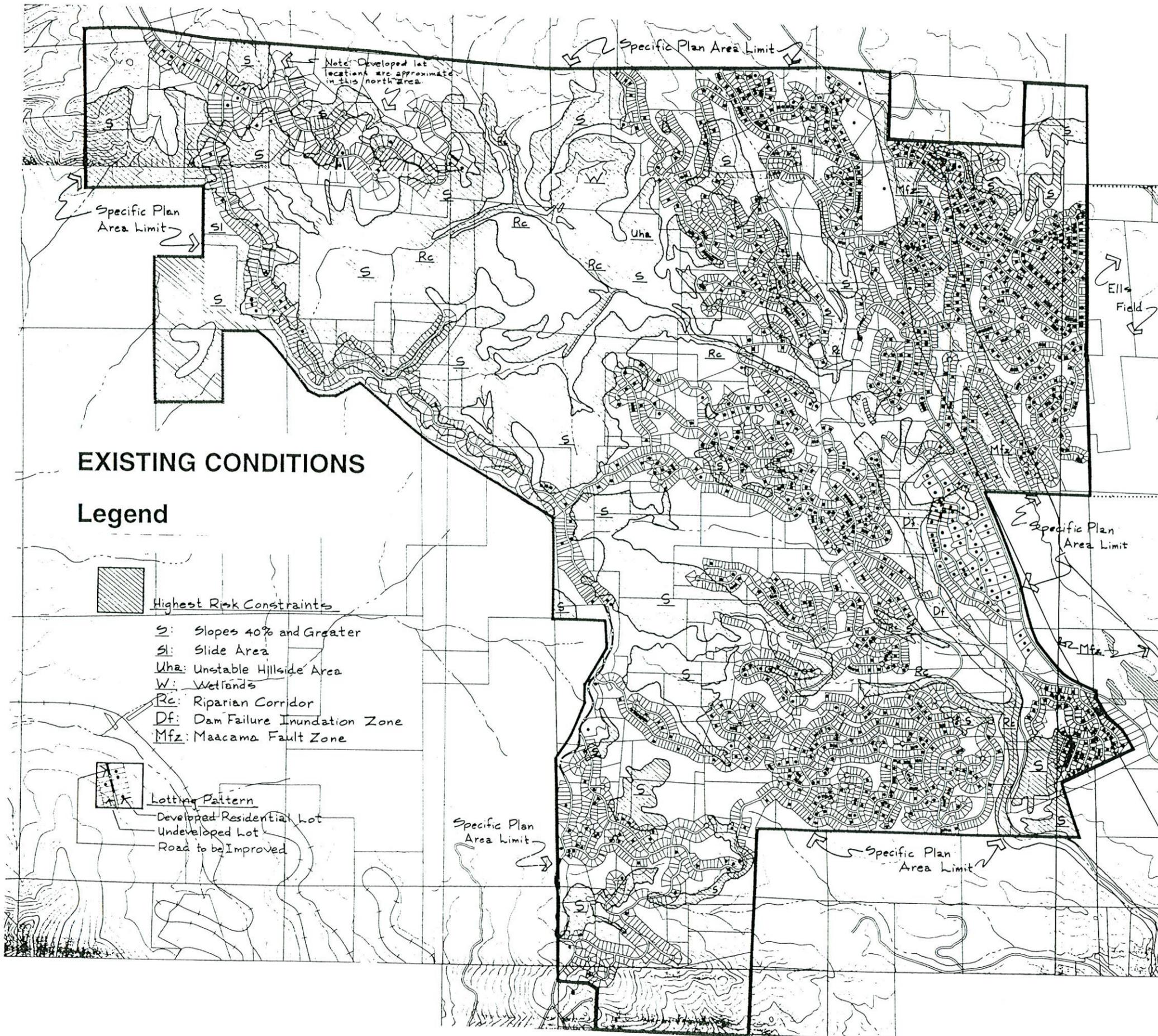
This section of the EIR establishes current conditions with respect to the number of existing lots within the Township, number of improved (developed) residential lots, and other development characteristics of the Township. This section of the EIR also evaluates the potential land use impacts of the Specific Plan, including existing and planned land uses within and surrounding the Township.

An Existing Conditions Map (Figure 3.1.1-1), has been prepared and is included on the following page. The Existing Conditions Map indicates the Specific Plan study area, Highest Risk Construction Constraint areas as derived from an Environmental Assessment previously prepared for the Township (EIP Associates, *Environmental Assessment*, Fall 1993), the existing lotting pattern and developed residential lots as of February, 1995. The Highest Risk Constraints areas are broken down by category; for example, slopes 40 percent and greater, riparian corridor, dam failure inundation zone and other features as shown on the map.

3.1.1-2 SETTING

Community Profile

Brooktrails Township is a recognizable community with a broad array of natural resources available for the use of Township residents. Brooktrails Township also has never been a suburban community particularly subservient to a larger metropolitan center. Rather, the Township has traditionally served as a community with its own identity within a larger geographic area that includes the City of Willits. In a December 17, 1969 article in the *New York Times*, Brooktrails was noted as being the first



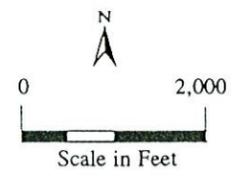
EXISTING CONDITIONS

Legend

-  Highest Risk Constraints
- S: Slopes 40% and Greater
- Sl: Slide Area
- Uha: Unstable Hillside Area
- W: Wetlands
- Rc: Riparian Corridor
- Df: Dam Failure Inundation Zone
- Mfz: Maacama Fault Zone

-  Lotting Pattern
-  Developed Residential Lot
-  Undeveloped Lot
-  Road to be Improved

Note: Developed lot locations are approximate in this north area.



BROOKTRAILS TOWNSHIP SPECIFIC PLAN
Figure 3.1.1-1
 Existing Conditions Map



community in the United States to blend a four-square-mile redwood and mixed-growth forest conservation park with a contiguous, fully lotted residential area. The term coined for this residential area built in a forest was *hyleopolis*.

The term *hyleopolis* essentially refers to the fact that Brooktrails functions as an urban-to-forest interface: it is a suburban development within a contiguous wooded park. *Hyleopolis* also refers to the character of the urban-forest interface where protection of the forest is paramount. That was the objective in Brooktrails from the beginning, and is the purpose of Ordinance 63, adopted by the Township Community Services District Board of Directors on June 23, 1988.

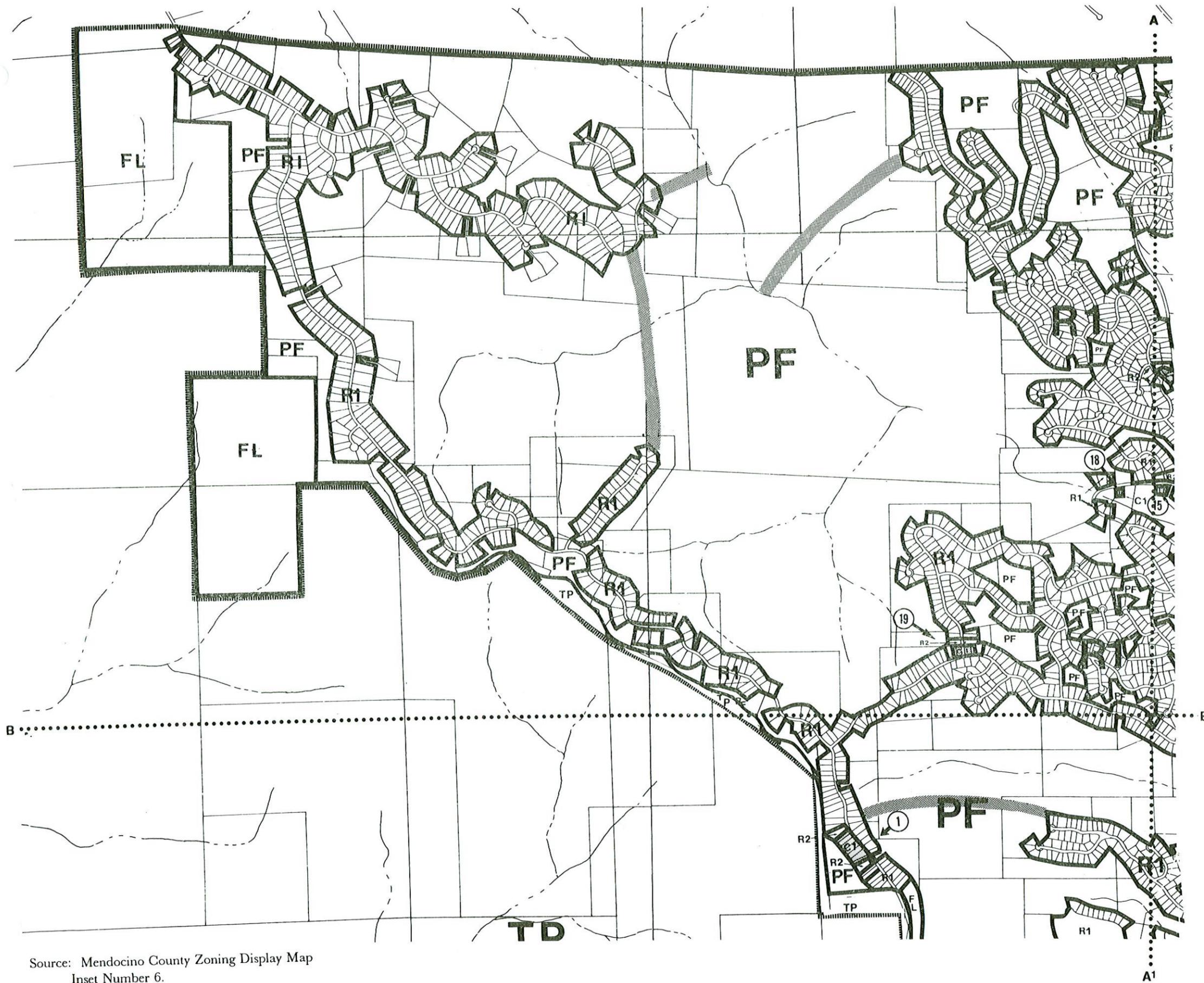
The original dedication of the forest "greenbelt" was for any use permitted to a resort improvement district. County zoning is consistent with this interpretation of the range of potential uses, designating that property for "Public Facilities". Ordinance 63 narrowed the use of the property by creating "Brooktrails Redwood Park" and including all of that "greenbelt" property within it. The Ordinance states that the Park constitutes much of the watershed of the Township, and as such is a facility incidental to the water system of the Township. The Ordinance further states that the primary public purpose of the Park is to protect, conserve, and manage trees, other vegetation and wildlife in order to retain and create a natural environment readily available for the enjoyment of property owners and residents of the Township. The Ordinance provides for a master plan for the Park which controls the uses of the property.

Land Use and Zoning

The breakdown of land area indicating existing/designated land use within Brooktrails Township by zoning district is presented in Table 3.1.1-1. The Township Specific Plan area is shown on Figures 3.1.1-2a through 3.1.1-2d and displays existing and designated land uses by zoning district.¹ As shown in Table 3.1.1-1 and on Figure 3.1.1-2, existing land uses by zoning district include public facilities, residential and commercial facilities, and forest land. Figure 3.1.1-3 is the Specific Plan proposed zoning Map. Figure 3.1.1-3 includes existing land uses, rezoned residential and commercial parcels, a new 1,600 acre-foot impoundment for domestic water supply, and circulation and infrastructure improvements to accommodate buildout.

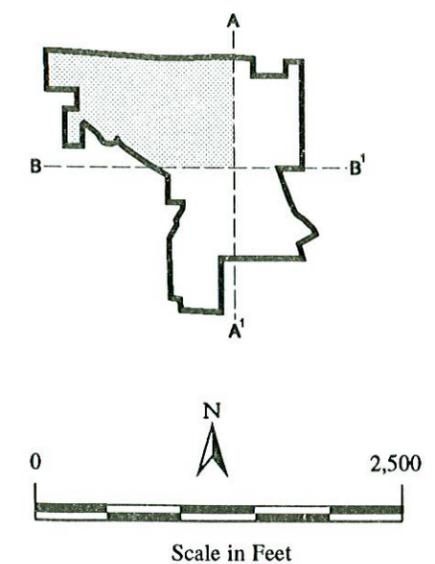
It should be noted that Table 3.1.1-1 and Figures 3.1.1-2 and 3.1.1-3 specifically exclude the Spring

1. Zoning Map source: County of Mendocino Planning Department, *Zoning Display Map Inset Number 6*.



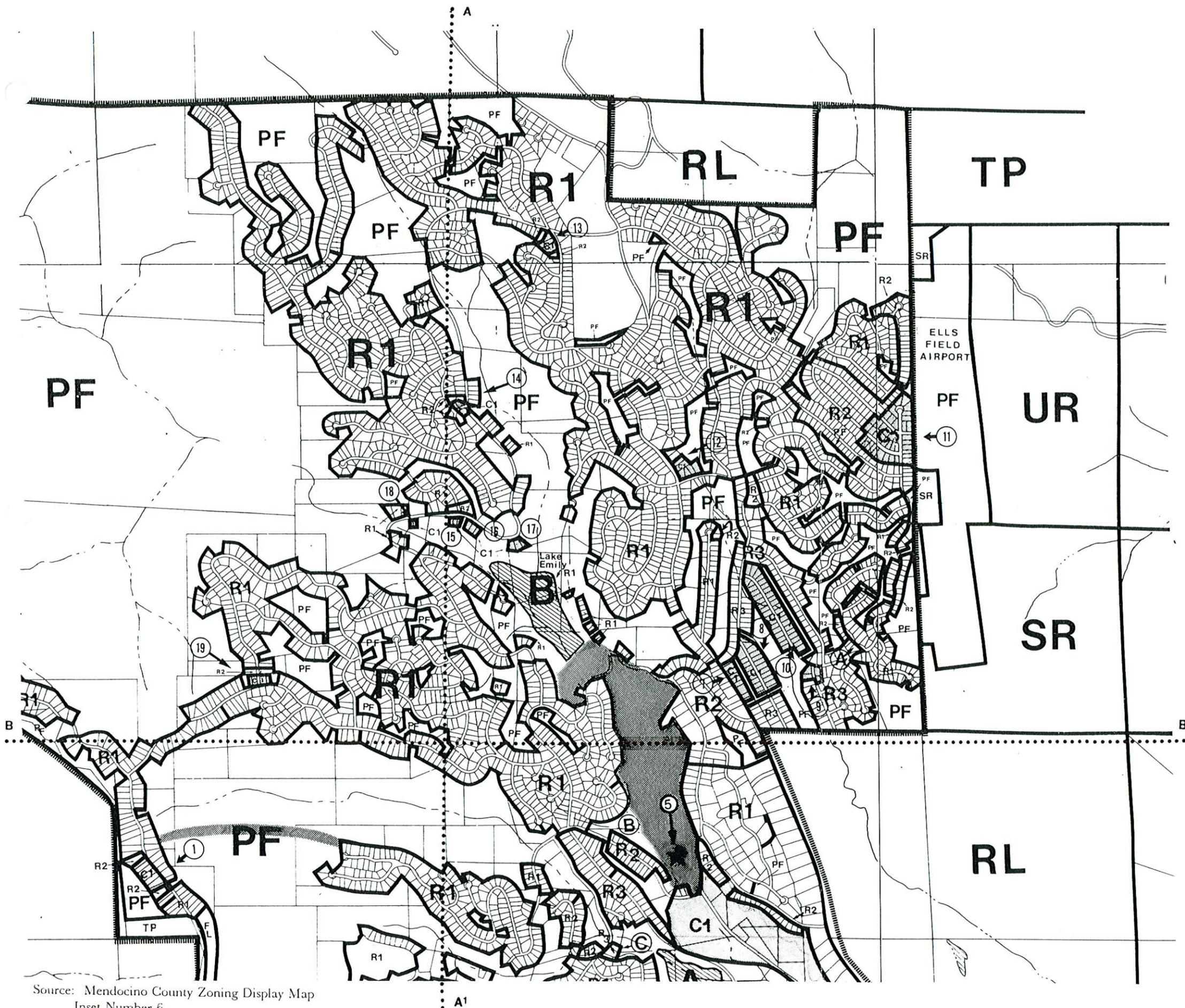
Legend:

- R1 Single Family Residential
- R2 Two Family Residential
- R3 Multiple-Family Residential
- C1 Limited Commercial (1-19 Site #'s)*
- PF Public Facilities
- TP Timberland Production
- FL Forest Land
- UR Upland Residential
- SR Suburban Residential
- RI Rangeland
- Lake (A-Ada Rose, B-Emily)
- Community Center/Fire Station
- Fuel Break
- Specific Plan Boundary
- See Specific Plan text for discussion
- See Specific Plan text for discussion



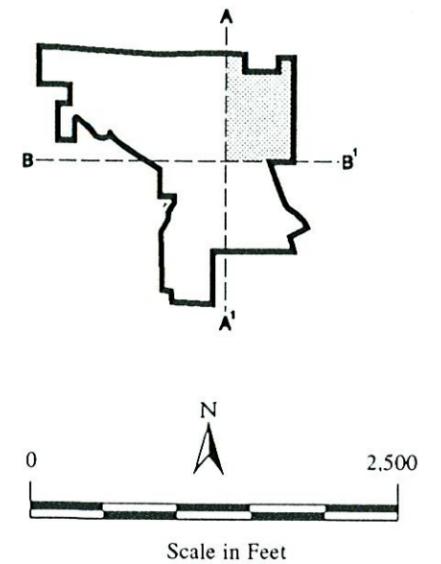
Source: Mendocino County Zoning Display Map
Inset Number 6.

BROOKTRAILS TOWNSHIP SPECIFIC PLAN EIR
Figure 3.1.1-2a
Zoning Map



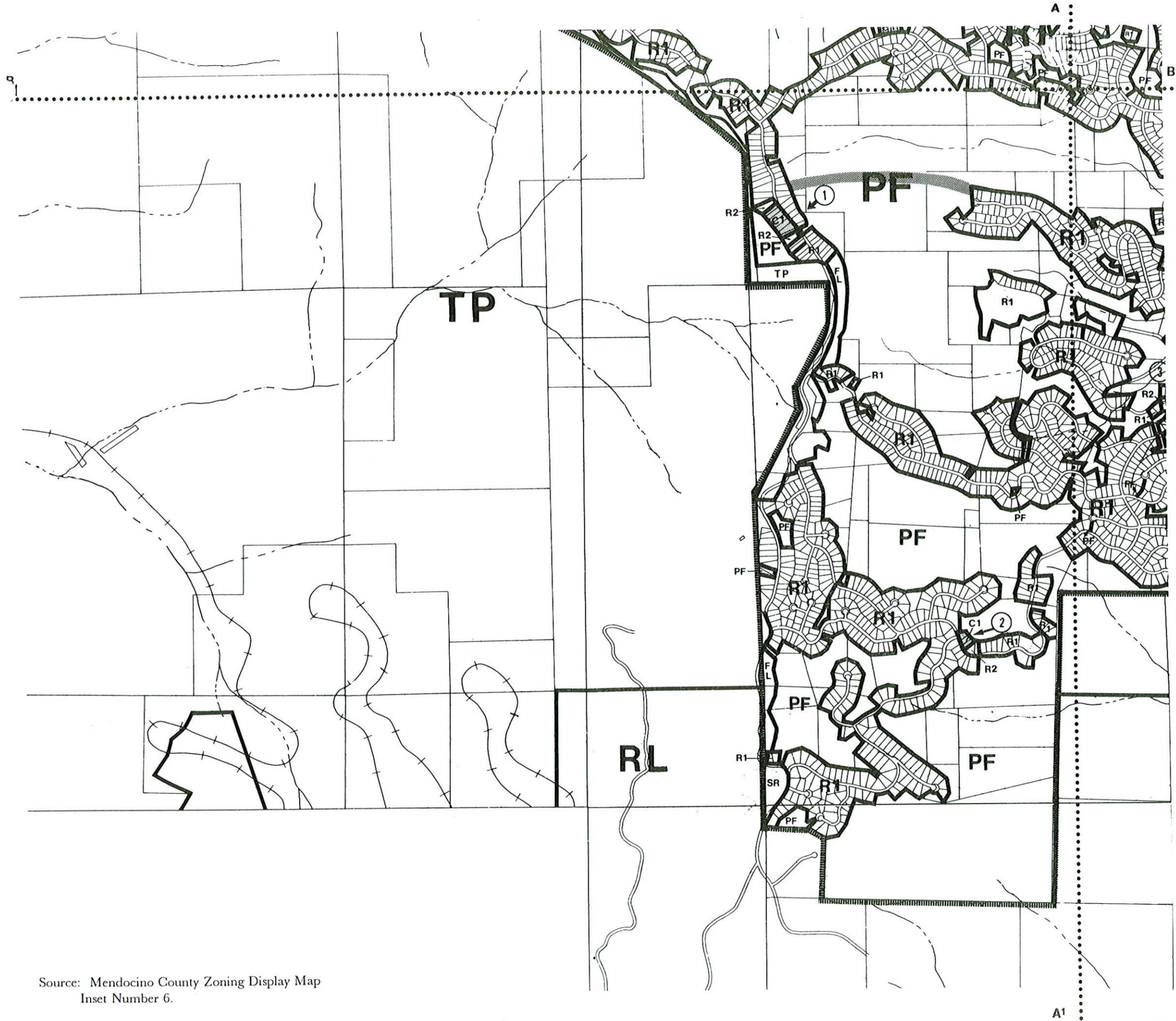
Legend:

- R1 Single Family Residential
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- ★ Community Center/Fire Station
- ▨ Fuel Break
- ▬ Specific Plan Boundary
- Ⓐ Ⓑ Ⓒ See Specific Plan text for discussion
- ① - ⑱ See Specific Plan text for discussion

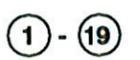


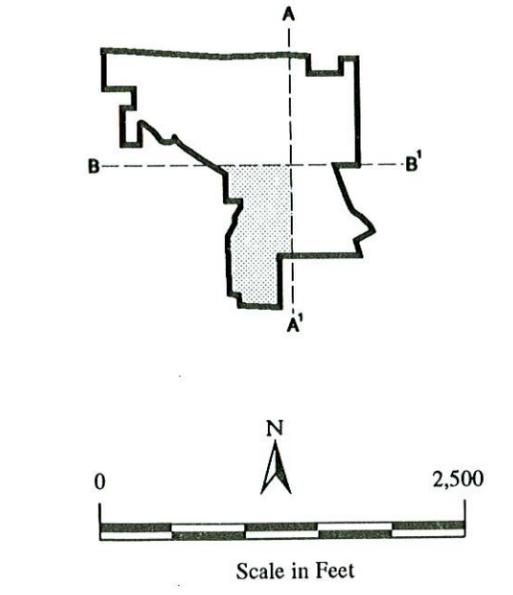
Source: Mendocino County Zoning Display Map
Inset Number 6.

BROOKTRAILS TOWNSHIP SPECIFIC PLAN EIR
Figure 3.1.1-2b
Zoning Map



Legend:

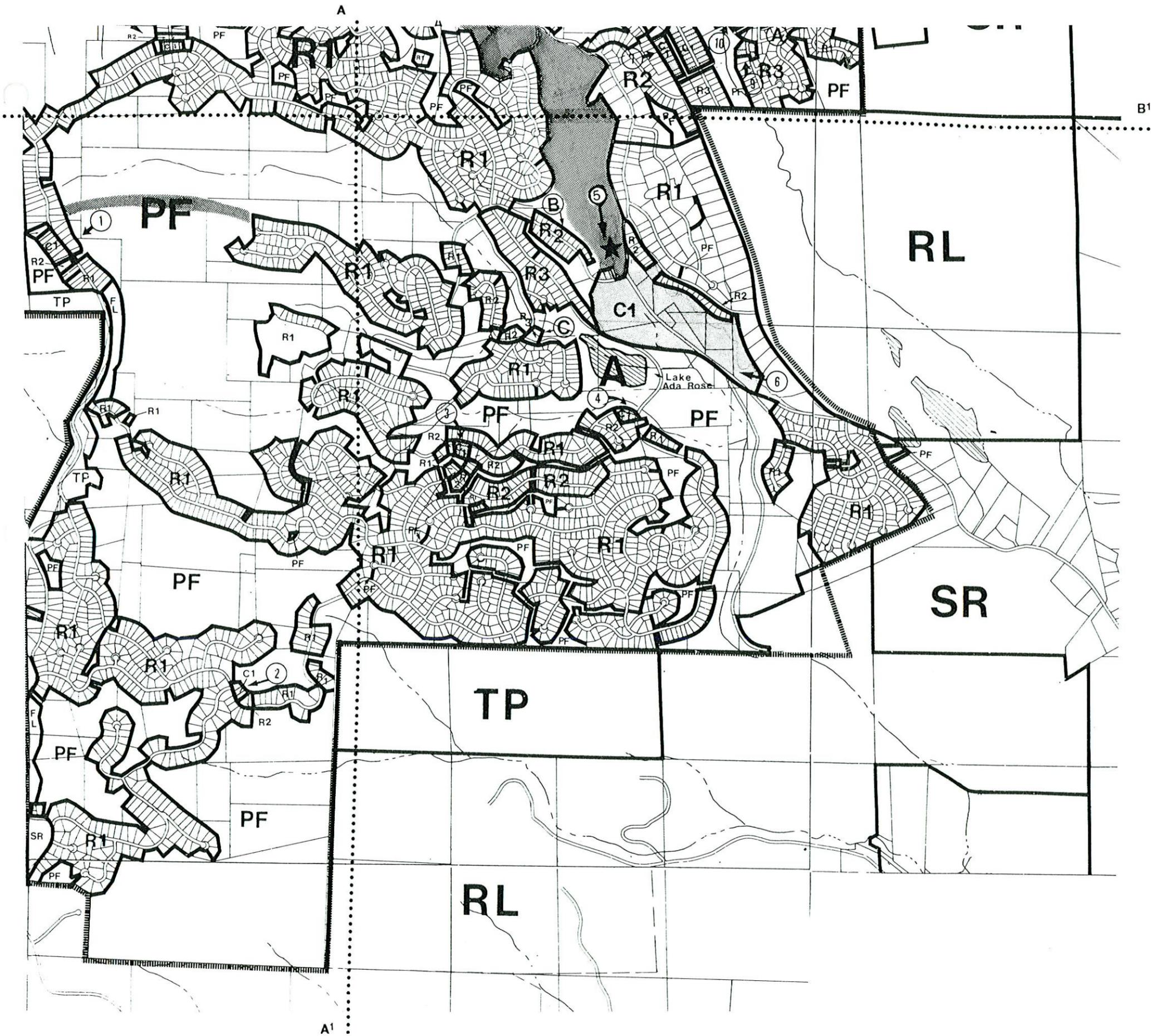
- R1 Single Family Residential
- R2 Two Family Residential
- R3 Multiple-Family Residential
- C1 Limited Commercial (1-19 Site #'s)*
- PF Public Facilities
- TP Timberland Production
- FL Forest Land
- UR Upland Residential
- SR Suburban Residential
- RI Rangeland
-  Lake (A-Ada Rose, B-Emily)
-  Community Center/Fire Station
-  Fuel Break
-  Specific Plan Boundary
-  See Specific Plan text for discussion
-  See Specific Plan text for discussion



Source: Mendocino County Zoning Display Map
Inset Number 6.

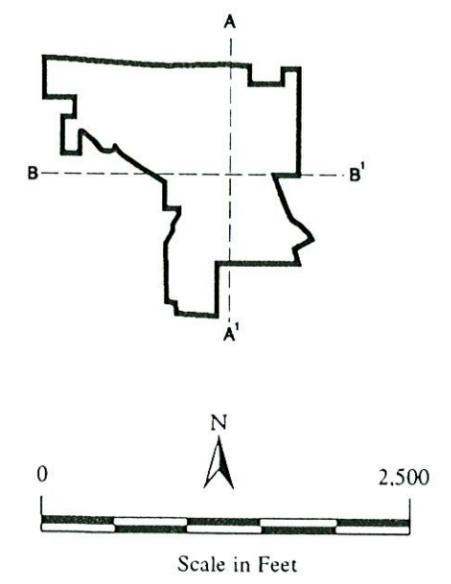
BROOKTRAILS TOWNSHIP SPECIFIC PLAN EIR
Figure 3.1.1-2C
Zoning Map



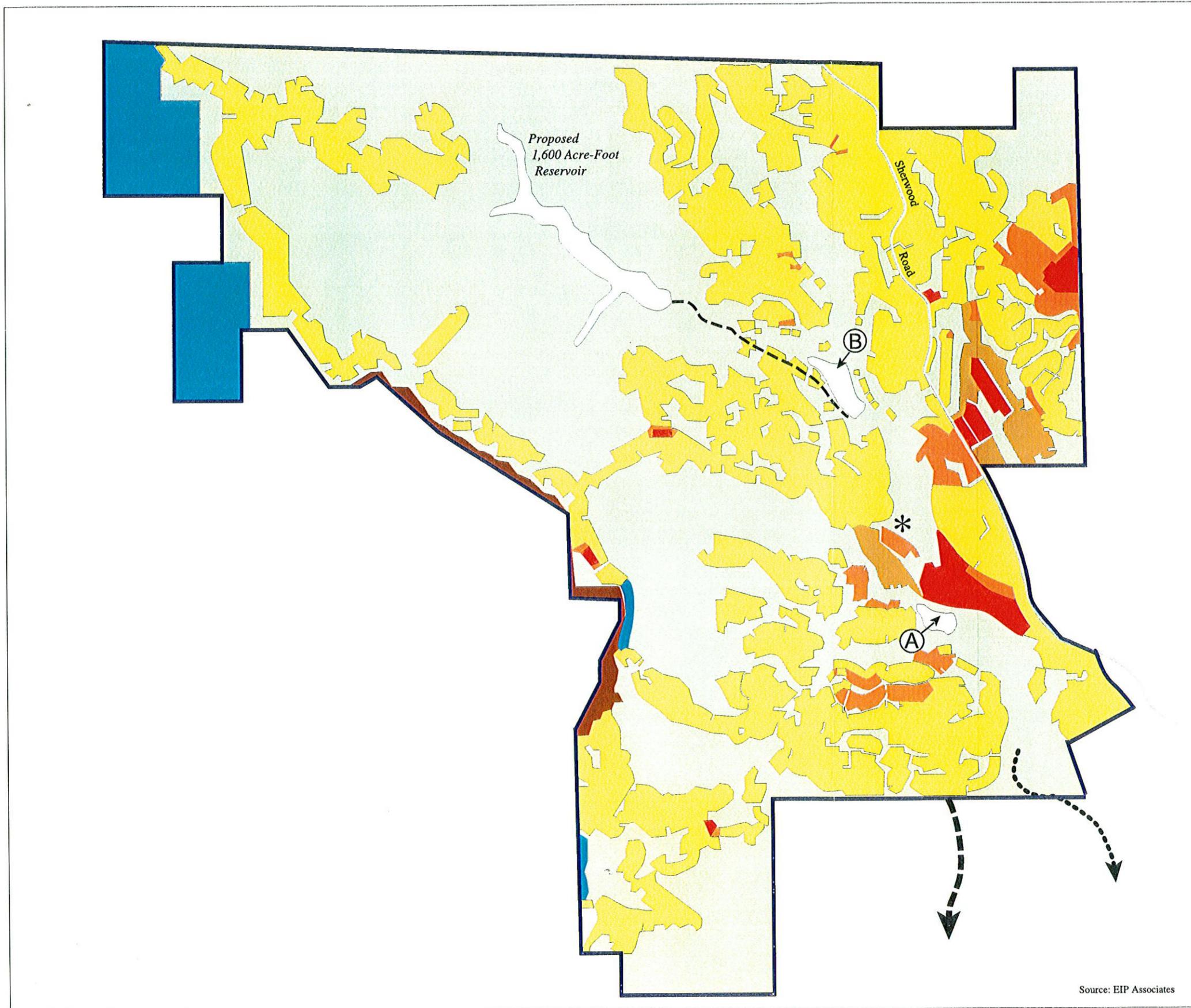


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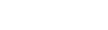
- R1 Single Family Residential
- R2 Two Family Residential
- R3 Multiple-Family Residential
- C1 Limited Commercial (1-19 Site #'s)*
- PF Public Facilities
- TP Timberland Production
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- Ⓐ Ⓑ Ⓒ See Specific Plan text for discussion
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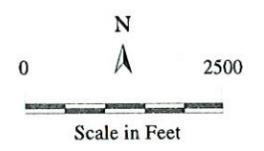


BROOKTRAILS SPECIFIC PLAN EIR
Figure 3.1.1-2d
 Zoning Map



Source: EIP Associates

-  Suburban Residential
-  Residential (Single-Family)
-  Residential (Two-Family)
-  Residential (Multiple-Family)
-  Limited Commercial
-  Public Facility
-  Forest Land
-  Timberland Production
-  Lake (A-Ada Rose, B-Emily)
-  Proposed Access Route to State Route 20
-  Proposed Trunk Sewer Main to City of Willits
-  Proposed Raw Water Main
-  Community Center/Fire Station
-  Specific Plan Boundary



BROOKTRAILS TOWNSHIP SPECIFIC PLAN EIR
Figure 3.1.1-3
 Specific Plan Zoning Map-Proposed



Creek and Sylvandale subdivisions, which are also part of the Township as explained previously (see section 2.1, Background and *Specific Plan Origination*). The Specific Plan addresses the 4,943 acre Brooktrails subdivision only. Because commercially zoned areas allow residential land uses, certain commercially zoned areas within the Township currently contain residential dwellings where commercial uses could otherwise occur. Zoning is more specifically described herein.

**TABLE 3.1.1-1
Breakdown of Brooktrails Township Land Area by Zoning District**

Zoning District	Existing/Designated Land Use	Acres	Lots	Existing Dwellings
R-1 Single Family Residential	Residential	1,613	5,444	1,109
R-2 Two-Family Residential	Residential	107	394	25
R-3 Multiple-Family Residential	Residential	71	201	104
S-R Suburban Residential	Residential	<u>40</u>	<u>8</u>	<u>-</u>
	(Subtotal)	1,831	6,047	1,238
C-1 Limited Commercial	Residential, Lodge Community Commercial	73	146	40
P-F Public Facilities	Greenbelt, Golf Course, Community Center, Fire Department, Water Supply/Treatment	<u>2,817</u>	<u>401</u>	<u>1</u>
	(Subtotal)	2,890	547	41
F-L Forest Land	Forest and Timber Preserve	<u>222</u>	<u>11</u>	<u>-</u>
	TOTAL	4,943	6,605	1,279

Source: Brooktrails Township Community Services District.

As indicated in Table 3.1.1-1 and shown on the Figures 3.1.1-2 and 3.1.1-3, residential land uses are the substance of the Brooktrails community. More than any other use, residential land uses predominate within the Township. Existing residential zoning is predominantly single-family residential zoning. The single-family district is envisioned to remain as the primary residential district in the Specific Plan.

The following zoning designations are currently in effect within the Township. The zoning district information provided in Table 3.1.1-2 is as specified in the Mendocino County Zoning Ordinance, Title 20 — Division I of the Mendocino County Code.

- R-1 Single-Family Residential
- R-2 Two-Family Residential
- R-3 Multiple-Family Residential
- Suburban Residential
- C-1 Limited commercial
- P-F Public Facilities
- F-L Forest Land

Areas immediately surrounding Brooktrails Township are zoned R-L Rangeland (livestock grazing, protection of natural resources), T-P Timberland Production (growing and production of timber), S-R Suburban Residential (residential with some commercial uses), and U-R Upland Residential (low-density agricultural/residential uses).

**TABLE 3.1.1-2
Brooktrails Township Zoning**

Residential

- R-1 Single-Family Residential District (Chapter 20.072)

The R-1 Single-Family Residential District extends throughout major portions of the Township. This district is intended to create and enhance neighborhoods where topography, access, utilities and public services make the land suitable and desirable for single-family home development and community services appurtenant thereto. Permitted uses include single family residential, community recreation, fire and police protection services, minor impact utilities, and other specified uses subject to issuance of a Use Permit (see Sections 20.072.005 through 20.072.045 of the Zoning Ordinance).

- R-2 Two-Family Residential District (Chapter 20.076)

The R-2 Two-Family Residential District intermingles with the R-1 Single-Family District throughout the Township. The R-2 District is intended to create and enhance certain medium-density residential areas, where a compatible mingling of single-family units, dual-unit dwellings and community services are likely to occur. Permitted uses include those land uses permitted in the R-1 Single-Family Residential District, two-family residential dwellings, and other specified uses subject to issuance of a Use Permit (see Sections 20.076.005 through 20.076.045 of the Zoning Ordinance).

**TABLE 3.1.1-2
Brooktrails Township Zoning**

- R-3 Multiple-Family Residential District (Chapter 20.080)

As with the R-2 Two-Family Residential District, the R-3 Multiple-Family Residential District intermingles with the R-1 Single-Family Residential District throughout the Township. The R-3 District is intended to create and enhance areas suitable for higher density residential uses, and for professional offices and institutional uses. Permitted uses include single-family, two-family and multi-family residential units (the use of a parcel for three or more dwelling units in one building). Other permitted uses include administrative services, government services, clinics, medical services, community recreation, library services, day care facilities and small schools, group care, lodge facilities and other uses subject to issuance of a Use Permit such as commercial services, educational facilities, campgrounds and major utilities (see Sections 20.080.005 through 20.080.045 of the Zoning Ordinance).

- S-R Suburban Residential District (Chapter 20.004)

The S-R Suburban Residential District, located in the southwest portion of the Township, is intended to create and enhance neighborhoods where a mixture of residential, public facilities and services and community oriented commercial convenience uses are desired. Commercial uses are to be subordinate to the dominant residential character of the area. Permitted uses include single-family residential and other uses similar to the R-1 District, with two-family and multiple-family uses subject to a Minor Use Permit. (see Sections 20.004.005 through 20.004.045).

Commercial

- C-1 Limited Commercial District (Chapter 20.008)

The C-1 Limited Commercial District, occurs at various locations throughout the Township. The C-1 District is intended to create and enhance areas where public facilities and services are available. The offices of the Brooktrails Community Services District are located in the C-1 District. Within the C-1 District, a limited number of retail commercial goods and services are desired primarily to meet day to day needs of local residents. Typically, this district would be applied within walking distance or short driving distance of a residential area, would confine the sale of goods and services to within a building and would permit only those uses which do not create, in the adjacent residential area, increased traffic, noise or other such impacts considered incompatible with the residential use.

Permitted uses include single-family residential and civic/commercial uses as described above for the R-3 Multiple-Family Residential District. Multiple-family residential uses and other commercial uses are permitted upon issuance of a Use Permit. There are few commercial uses on C-1 zoned lands within the Township, and a number of C-1 zoned parcels have been developed with residential unit (see Sections 20.088.005 through 20.088.045 of the Zoning Ordinance).

**TABLE 3.1.1-2
Brooktrails Township Zoning**

Public Facilities and Forest Land

- P-F Public Facilities District (Chapter 20.108)

The P-F Public Facilities District encompasses the most land of any zoning district within Brooktrails Township as described further below. Public Facility District lands cover both large and small land areas and intermingle considerably with residentially zoned parcels throughout the Township. The extent of Public Facilities District lands within the Township and absence of development thereon is an important element in achieving the current rural character prevalent within the Township today.

The Public Facilities District is intended to create and preserve those properties which are properly used for or are proposed to be used for public purposes or for specified public utility purposes. Permitted uses include community recreation, administrative and government services, clinic services, library services, day care and education facilities, essential services, civic assembly, commercial uses, agriculture use, forest production and processing (limited), tree crops and related uses. Other uses are permitted subject to issuance of a Use Permit such as single-family residential, mining and lodging (see Sections 20.108.005 through 20.108.040 of the Zoning Ordinance).

- F-L Forest Land District (Chapter 20.064)

The F-L Forest Land District is intended to create and preserve areas suitable for the growing, harvesting and production of timber and timber-related products. Processing of products produced on the premises would be permitted as would certain commercial activities associated with timber production and the raising of livestock. Typically¹¹ the F-L District would be applied to lands not zoned Timberland Production (T-P), but which have the present or future potential for timber production, intermixed smaller parcels and other contiguous lands, the inclusion of which is necessary for the protection of efficient management of timber resource lands.

Other permitted uses include single-family residential, community recreation and civic uses, and general agriculture. Multiple-family residential and various categories of commercial use are permitted subject to issuance of a Use Permit (see Sections 20.064.005 through 20.064.055). Forest Land District lands within the Township are located in the southwest portion of the Township (see Figure 3.1.1-2).

Based on site investigations, review of technical reports, review of Community Services District records regarding existing development, and discussions with Community Services District General Manager Mr. Paul Williams, the following statistical data regarding Brooktrails Township is provided (refer to the footnotes below for data sources).

TABLE 3.1.1-3
Brooktrails Township Statistical Data

1. Total number of existing residential lots:	6,188 ^{/1/}
2. Total number of <u>improved</u> (built) residential lots:	1,150 ^{/2/}
3. Total number of <u>unimproved</u> (unbuilt) residential lots:	5,038 ^{/3/}
4. Average annual multiple residential lot ownership rate (buyer secures more than one lot):	average 11 percent rate ^{/4/}
5. Number of residential lots in high constraint area:	985 ^{/5/}
6. Number of <u>improved</u> (built) residential lots in high constraint area:	157 ^{/6/}
7. Number of <u>unimproved</u> (unbuilt) residential lots in high constraint area:	828 ^{/7/}
8. Average annual water consumption:	220 gpd/SFR unit ^{/8/}

/1/ Derived as follows - 6,605 total lots minus the following:

Public Facility (Greenbelt)	371
Public Facility (Upper Nine)	3
Public Facility (Golf Course)	3
Public Facility (Community Center)	2
Public Facility (Fire)	2
Public Facility (Water)	20
Lodge	5
Timber Preserve	3
Forest Land	8
Total:	417

Source: Brooktrails TCSD, *Breakdown Within the Brooktrails Township CSD, December 31, 1995*. Total residential lots (6,188) includes C-1 (Limited Commercial District) zoned lots for which single-family detached units are a permitted use (146 lots total).

/2/ Includes 13 improved lots (residential) on C-1 (Limited Commercial District) zoned parcels.

/3/ Includes C-1 (Limited Commercial District) zoned lots for which single-family detached units are a permitted use.

/4/ Confirmed by Paul Williams, Brooktrails TCSD General Manager, through Planner Nancy Dakin, Memo of 11/11/94. Also, Memo to Brooktrails Township CSD Board of Directors, from Paul A. Williams, General Manager, August 25, 1994.

- /5/ Source: EIP Associates. Lot count based on lot overlay with High Constraint Area Map, October 12, 1994, supplemented with additional field inspections in November 1994, with revisions made to the High Constraint Area Map in December, 1994, based on the additional field inspections. Lot count includes Commercial zoning designations because residential land uses are permitted under the C-1 (Limited Commercial District) zoning designation.
- /6/ Brooktrails Township Includes five developed lots in the C-1 District.
- /7/ Includes lots in the C-1 District because residential is a permitted use.
- /8/ Source: Brooks and Vogel, *Management Plan Update for Brooktrails Township Community Services District, November 1993*, page 3-1.

3.1.1-3 IMPACTS AND MITIGATION MEASURES

Brooktrails Township Specific Plan Policies

Plan goals specifically related to rezoning in the Plan area appear in the Land Use and Planning Chapter of the Plan as ZONING GOAL LU-4.1. The Policies for implementing the Goal are central to the issue of rezoning and are reiterated here to allow the reader easy reference to the actual language in the Plan.

ZONING GOAL LU-4.1: Zoning shall be predominantly single-family residential.

POLICY LU-4.1A: Clarify the existing zoning and the extent of developed commercial areas; consider designation of other necessary commercial areas.

POLICY LU-4.1B: Redesignate remaining, undeveloped commercially zoned parcels to single or two-family residential, as appropriate.

Standard of Significance

A project would normally have a significant adverse land use impact if it would conflict with the adopted land use plans and zoning ordinance of the area where the project is located. For purposes of this EIR, the following are considered potentially significant land use impacts: 1) a proposed use that could not be approved by a local agency (within its permitted discretion), for the Zoning/General Plan land use designation in which it is proposed to be located; 2) a proposed project that would result in the conversion of designated open space into urban or suburban land uses; and 3) a proposed project that would result in a use substantially incompatible with existing surrounding land uses.

Zoning/General Plan Land Use Designations

The Specific Plan calls for Brooktrails to contain predominantly single-family residential zoning and single-family land uses. The Specific Plan area includes 1,613 acres currently zoned for single-family land use, and 178 acres zoned for two-family and multiple-family residential land use. With an additional 40 acres of Suburban Residential zoned land use, the total residential zoned area amounts to 1,831 acres consisting of 6,047 lots and 1,238 dwellings for an overall density of 0.68 units per acre of residentially zoned land at the time of preparing the Specific Plan.²

2. An additional 40 units, including lodge overnight units, are located on 73 acres pf C-1 (Limited Commercial) District lands.

Impact 3.1.1-1**Nine commercially zoned properties would be rezoned to residential use. (I)**

Single-family residential land use currently predominates within the Township. The Specific Plan notes that certain commercially zoned properties are either developed with residential use or are considered too steep for commercial development and/or too small to provide adequate access and parking for a commercial use. These sites, nine in total, amounting to about eight to ten acres, are to be rezoned for single-family use (see Figure 3.1.1-2 for location). Rezoning these commercially zoned properties to residential use would recognize limitations of the existing terrain and reflect residential land use within the Township as the primary land use.

Mitigation Measure 3.1.1-1

None required. Rezoning in itself is a mitigation measure to achieve a compatible tie between steeper terrain and feasible land uses.

Impact 3.1.1-2**Specified sites totaling about six acres would be downzoned from multiple-or two-family land use. (I)**

Sites A, B and C are shown on Figure 3.1.1-2, *Existing Zoning*. Rezoning of these sites is called for in the Specific Plan as follows:

Site A: Approximately one acre of this R-3 zoned area is considered to steep for R-3 development and should be rezoned to R-2 (junction of Archer and Madrone Drive).

Site B: The parcel should be rezoned from R-2 to C-1 to reflect use as a real estate office. The site is steep with limited space for any additional development or expansion of the existing facility.

Site C: The site should be rezoned from R-3 to R-2. The site contains a reasonable amount of space for development, but is subject to stormwater flow extending to the creek/riparian corridor. The area is considered sensitive to disturbance, and could generate creek sedimentation (see also Section 4.1.2, *Hydrology and Water Quality*, for issues related to sedimentation and erosion).

Under this scenario, two R-3 sites would be rezoned to R-2. Both sites could be developed with two-family structures. It is noted that retaining the R-3 Multiple-Family zoning designation within Brooktrails would assist the County in achieving its low and moderate income goals as expressed in the Housing Element of the General Plan. Multiple family zoning provides the opportunity to erect residential structures that are less costly on a per-unit basis than individual single-family units and would be

consistent with General Plan Policy 1.4c which calls for supporting the conservation of affordable housing, and Implementation Measure 1.5.5 to allow increased densities in areas with water and sewer service.

The Specific Plan does not call for a substantial reduction in R-3 zoned parcels. Rezoning the two R-3 parcels as explained above would be consistent with the need to recognize the limitations of building on steep terrain and existing drainage and soil conditions.

Mitigation Measure 3.1.1-2

None required. Rezoning in itself is a mitigation measure to achieve a compatible tie between steeper terrain and feasible land uses.

Designated Open Space

As noted previously, there are 2,817 acres of Public Facilities (PF District) zoned land, inclusive of community greenbelt (open space), for public use and hiking. The Public Facilities District would be unaffected by the provisions of the Specific Plan, with the exception of the 1,600 acre impoundment area needed for domestic water supply in order to accommodate buildout of the Township. The water impoundment would be located in the open space area as shown on Figure 3.1.1-3, *Proposed Zoning Map*, within a drainage area sufficient in size to provide adequate runoff for the impoundment and required fish flow releases. This issue will be addressed in the EIR to be prepared for the new reservoir when actual planning for the design of the reservoir takes place in the future, consistent with the provisions of this Program EIR (see the *Introduction* portion of this EIR for an explanation of a Program EIR).

Existing Land Uses

Land uses surrounding the Township consist primarily of rangeland, forest land and agricultural land except for the nearby City of Willits. No significant development is anticipated in the immediate vicinity of the Township. In addition, the Specific Plan does not establish any significant changes in land use within the Township itself, and given the existing lotting pattern, no incompatible land uses are foreseen, either within the Township or between the Township and areas immediately outside the Township.

It should be noted that Ells Field Airport is located immediately adjacent to the northeast quadrant of Brooktrails. This is a community airport suitable for one and two-engine propeller-driven aircraft. On October 21, 1993, the Mendocino County Airport Land Use Commission adopted the final

Comprehensive Land Use Plan for the Boonville, Ells Field, Little River, Ocean Ridge and Round Valley airports.³

The Airport Compatibility Land Use Plan sets forth the criteria and policies which the Mendocino County Airport Land Use Commission will use in assessing the compatibility between public use airports in Mendocino County and proposed land use development.

The Plan specifically pertains to the land uses surrounding five public use airports in Mendocino County, including Ells Field. A major finding of the Plan was that there are about 100 Brooktrails parcels located within the airport B1 Zone. The B1 Zone is classified as an approach/departure zone adjacent to a runway. The risks involved in a B1 Zone include safety (classified as "substantial risk") because aircraft in this zone are commonly below 400 feet above the ground or within 1,000 feet of the runway, and there is apt to be substantial aircraft noise.

The B1 Zone Compatibility Criteria as specified in the Plan calls for residential parcels not less than ten acres in size, that the land should not attract more than ten people per acre at any one time, and that 30 percent of the land should be "open." Residential subdivisions are listed as not normally acceptable in the B1 Zone, although single-family homes on an existing lot are normally acceptable (Table 2A, Page 2-6).

The Plan states (page 4-2):

"Although undesirable from a compatibility standpoint, there are only a few modifications which could potentially be achieved through land use regulation to improve the compatibility. Every opportunity should be taken to reduce the number of potential residential units. Approximately 35 of these parcels are designated neighborhood commercial, but are undeveloped. The neighborhood commercial designation permits the development of multifamily housing. Compatibility would be improved if either: multifamily housing were prohibited on these lots or the parcels were redesignated for single-family dwellings."

Thus, the Specific Plans calls for the Township to seek to coordinate with the Airport Land Use Commission in evaluating proposed land use development at Ells Field to enhance airport land use compatibility. Under a five year update of the Specific Plan, the County may initiate rezoning of existing

3. Mendocino County Airport Land Use Commission, *Comprehensive Land Use Plan*, Hodges and Shutt, Santa Rosa, California, Adopted October 21, 1993.

two-family and commercially zoned parcels within the B-1 zone to single-family residential use. Continued single-family development within the B-1 zone would support this action. Currently, there are a total of 139 parcels within the B1 Zone, 43 of which are improved and 96 of which are unimproved (have no residences).