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COUNTY OF MENDOCINO
DEPARTMENT OF TRANSPORTATION

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April 6, 2026

TO: Board of Supervisors

FROM: Howard N. Dashiell, Director of Transportation

RE: RESPONSE TO ROLLS, ANDERSON, & ROLLS LETTER DATED MARCH 21, 2026, REGARDING BELLA VISTA REQUEST FOR TAB H EXCEPTIONS – REFERRAL TO THE BOARD OF SUPERVISORS

The Bella Vista developer has requested two separate exceptions from the Mendocino County Road and Development Standards, one for rolled curbs and the other to use HDPE pipe for storm drains. The Department has reviewed the requests of the developer and strongly recommends against the use of HDPE pipe for storm drains but is less opposed to the use of rolled curbs within the subdivision.

The Department Recommends Reinforced Concrete Pipe (RCP) over HDPE pipe

Section 51 of the Mendocino County Road and Development Standards states only that storm drain structures shall be constructed in conformance with the County's standard road plans, and this section is followed by Sections 63 through 66, which contain standards for installation of various pipes. Section 64 does include standards for HDPE pipe, but only *if* it is to be used as storm drain material. However, Section A51C of the Road Plans provides that culvert material is subject to the approval of the County. The Department strongly recommends the use of RCP within the Bella Vista subdivision.

Concrete has a long history of durability and resistance to environmental factors. Vastly superior to metal pipe in that it will not rust, it is also impervious to wildfires, unlike plastic pipe. As stated in the Department's initial response to the developer about using HDPE, the Department has seen that HDPE pipe is susceptible to damage from high heat from wildfire events. It is not proven which would sustain less damage from an earthquake, but concrete is better in a wildfire, which have become an annual threat in California. There are fewer likely

scenarios in which RCP would need to be replaced as compared to plastic. In this application, plastic cannot be considered as equivalent or superior to concrete, in which case the Department does not believe that finding 1 of paragraph H.B.6 can be made in favor of HDPE pipe.

Further, storm drains are located under the curb/gutter/sidewalk, alongside and crossing with electric conduits, communication lines, water lines, and sewer lines, since all utilities in this subdivision are underground. Any replacement of the storm drains will be at a very high expense to the County. Given that the current direction is for the County to be the eventual owner of infrastructure like the curbs, gutters, sidewalks and storm drains, this difference in durability could have very real, significant financial impacts to the County.

Finding 2 of paragraph H.B.6 is that the exception will not constitute a grant of special privilege. One purpose of having standards in development is to remain consistent when setting development requirements. Since the increase in wildfires, the Department's stance on storm drains in future developments is that they should be RCP, though the Bella Vista subdivision is the first major subdivision approval of the County following the wildfire events that have happened with increasing frequency since approximately 2017. Allowing HDPE pipe in this instance could be claimed as setting a precedent for future development as well. This could make it more difficult for the County to require RCP in the future for later subdivisions.

In regards to environmental impact, the developer's request alleges that HDPE allows more pipe per delivery truck, easier handling, smaller construction crews, less heavy equipment at the site, less potential damage to the pipe and better safety during construction. The Department acknowledges that concrete pipe takes more time and equipment to install, resulting in more carbon being released. However, Department believes that it would be much more energy intensive to dig up and replace damaged plastic pipe if it is impacted by a wildfire.

The Department Believes the Rolled Curb Exception Request Can Be Approved

The other exception to the County standards requested by the developer is to use rolled curbs instead of vertical curbs. Rolled curbs allow for the curb/gutter/sidewalk to be built before the location of driveways are decided, allowing for more flexibility in house location on a lot. The developer submitted four standard drawings from other public agencies for rolled curbs, since Mendocino County does not have a standard for rolled curbs. The Department indicated that rolled curbs are an acceptable, if not preferred, alternative, choosing the standard from Sonoma County which requires reinforcing bar (rebar). Rolled curbs encourage drivers to park on the curb and gutter, causing more damage to the concrete than a traditional curb. To help longevity, a

standard with rebar was chosen by the Department. The developer has still sought a referral to the Board of Supervisors, which the Department is based on a desire for a standard without rebar.

The Department has greater liability concerns regarding the material of the storm drains as compared to rolled curbs. The Department agrees that the rolled curb and gutter will convey stormwater similar to a vertical curb and gutter. Rolled curbs have been used in other residential subdivisions in unincorporated areas on both the north and south sides of the City of Ukiah, and allowing it in this instance would not be considered a special privilege. As stated by the developer, the construction techniques can be efficient and reduce construction duration, and the Department sees no increase in adverse environmental impacts in its use, nor does the Department believe installation of rolled curbs and gutters will be injurious or detrimental to the public health and safety.

In its letter to the Board of Supervisors, the developer has stated it would like to use a rolled curb standard without rebar as opposed to the Sonoma County standard initially selected by the Department from the four options provided by the developer. The developer did not specify a standard it would like used. The Department would still recommend the Board adopt the Sonoma County standard for increased longevity, but believes the City of Sacramento standard could reasonably be approved by the Board.

The resolution proposed for the Board's adoption recommends the use of the Sonoma County rolled curb specifications and the denial of the request to use HDPE instead of RCP. Should the Board determine to approve alternatives, the Department would request a continuance to provide time to revise the resolution in order to make the appropriate findings.

Also included in this agenda packet is the developer's request for a Tab H referral to the Board of Supervisors, which includes the original requests made to the Department, the Department's responses and an article regarding HDPE materials used by the Town of Paradise. The County's Road Standards, including Tab H, can be found at the following webpage:

<https://www.mendocinocounty.gov/departments/transportation/road-standards>.

Department staff will be present at the Board meeting to answer any questions.



HOWARD N. DASHIELL
Director of Transportation

4/6/26
Date

cc: Bella Vista Estates Project File