



Proposed Mitigated Negative Declaration

Sonoma County Permit and Resource Management Department
2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 565-1900 FAX (707) 565-1103

Publication Date: 30 July 2019
Public Review Period: 30 July – 29 August 2019
State Clearinghouse Number:
Permit Sonoma File Number: **UPE18-0010**
Prepared by: Gary Helfrich
Phone: (707) 565-2404

Pursuant to Section 15071 of the State CEQA Guidelines, this proposed Negative Declaration and the attached Initial Study, constitute the environmental review conducted by the County of Sonoma as lead agency for the proposed project described below:

Project Name: Bergin University of Canine Studies

Project Applicant/Operator: Bonita and James Bergin

Project Location/Address: 10201 Old Redwood Highway, Penngrove, CA 94951

APN: 047-052-001

General Plan Land Use Designation: RR (Rural Residential) 2.5 acre density

Zoning Designation: AR (Agriculture and Residential) B6 2.5, RC50/50 (Riparian Corridor with 50-foot setbacks)

Decision Making Body: Planning Director, provided that pursuant to Section 26-02-050 of the Municipal Code, no timely, written, and signed requests for public hearing are received

Appeal Body: Board of Zoning Adjustments. Board of Zoning Adjustments decisions are appealable to the Sonoma County Board of Supervisors

Project Description: See Item III, below

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**Table 1. Summary of Topic Areas**

Topic Area	Abbreviation*	Yes	No
Aesthetics	VIS		X
Agricultural & Forest Resources	AG		X
Air Quality	AIR		X
Biological Resources	BIO	X	
Cultural Resources	CUL		X
Geology and Soils	GEO		X
Greenhouse Gas Emission	GHG		X
Hazards and Hazardous Materials	HAZ		X
Hydrology and Water Quality	HYDRO		X
Land Use and Planning	LU		X
Mineral Resources	MIN		X
Noise	NOISE		X
Population and Housing	POP		X
Public Services	PS		X
Recreation	REC		X
Transportation and Traffic	TRAF	X	
Utility and Service Systems	UTL		X
Mandatory Findings of Significance			X

RESPONSIBLE AND TRUSTEE AGENCIES

The following lists other public agencies whose approval is required for the project, or who have jurisdiction over resources potentially affected by the project.

Federal Agencies

1. *Army Corps of Engineers* - regulates activities that have the potential to affect navigable waters under Section 10 of the Rivers and Harbors Act of 1899 (Section 10 permits) and waters of the United States under Section 404 of the Clean Water Act (Section 404 permit). The Corps would be responsible for determining its jurisdiction over wetlands and waters of the U.S. that would be removed or filled and determining what level of mitigation would be required for that removal/filling.
2. *U.S. Fish and Wildlife Service* - administers the Federal Endangered Species Act and the Marine Mammal Protection Act. The USFWS is an advisory agency to the Army Corps on Section 404 and Section 10 projects. The USFWS reviews mitigation plans for these projects.

State Agencies

1. *North Coast Regional Water Quality Control Board (RWQCB)* – regulates discharges to waterways through the adoption of Waste Discharge Requirements (WDR) and National Pollution Discharge Elimination System (NPDES) permits.

2. *Office of Planning and Research* - circulates CEQA documents for review by State agencies.
3. *Department of Fish and Wildlife (CDFW)* – is also a Trustee Agency and has authority to oversee work done in streams pursuant to Fish and Game Code 1601 and 1603. An applicant who proposes to substantially divert the natural flow of a stream, substantially alter its bed or bank, or use any material from the streambed must first enter into a "Streambed Alteration Agreement" with CDFG.
4. *Native American Heritage Commission* - mandated to preserve and protect places of special religious or cultural significance pursuant to Section 5097 et seq. of the Public Resources Code.

Local Agencies

1. *Sonoma County Department of Transportation and Public Works* - responsible for reviewing projects for impacts to County roads. The Department will determine the Road Fee required for the project.
2. *Permit Sonoma Well and Septic Section* – responsible for reuse of on-site wastewater disposal systems and permitting for new systems. Well and Septic will determine allowable wastewater flows for Phase 1, and design of the new system that will serve Phase 2.

The *CEQA Guidelines* (Section 15386) define "trustee agency" as "a State agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California." Trustee Agencies include the California Department of Fish and Wildlife, which has jurisdiction over State fish and wildlife, designated rare or endangered native plants, and game refuges, ecological reserves, and other areas. (See discussion under "State Agencies" above.)

ENVIRONMENTAL FINDING:

Based on the evaluation in the attached Expanded Initial Study, I find that the project described above will not have a significant adverse impact on the environment, provided that the mitigation measures identified in the Initial Study are included as conditions of approval for the project and a Mitigated Negative Declaration is proposed. The applicant has agreed in writing to incorporate identified mitigation measure into the project plans.



Expanded Initial Study

Sonoma County Permit and Resource Management Department
2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 565-1900 FAX (707) 565-1103

I. INTRODUCTION:

Bergin University for Canine Studies has applied for a Use Permit for a private post-secondary educational/vocational institution for training service dogs on a 9.68 acre parcel. The project will be implemented in two phases: Phase 1 will install modular units in the existing parking lot to allow limited operations to begin prior to renovating the site to accommodate the full project. Phase 2 is the conversion of an existing restaurant building to a permanent training facility and to remove the modular units.

This report is the Initial Study required by the California Environmental Quality Act (CEQA). The report was prepared by Gary Helfrich, Planner III, Permit Sonoma Project Review Division. Information on the project was provided by Bergin University for Canine Studies. Technical studies provided by qualified consultants are attached to this Expanded Initial Study to support the conclusions. Other reports, documents, maps and studies referred to in this document are available for review at the Permit and Resource Management Department (Permit Sonoma) or on the County's website at: <http://www.sonoma-county.org/prmd/divpages/projrevdiv.htm>

Please contact Gary Helfrich at (707) 565-2404 for more information.

II. EXISTING FACILITY

The site is developed with a vacant 14,000 square foot building that formerly housed the Green Mill Inn and Restaurant, an approximately 900 square foot single family dwelling, several small miscellaneous sheds/out buildings and a 100-foot tall water tower that provides water for fire suppression and supports numerous telecommunication facilities. The main building was constructed in 1932, operated as a restaurant until 2003, and has been vacant since the restaurant closed. The site is served by an existing on-site well and wastewater disposal system.

An ephemeral tributary of Lichau Creek runs from the northerly side of the parcel towards the southerly side of the parcel. The tributary is culverted under the parking lot to the northeast where it drains under Old Redwood Highway to Lichau Creek.

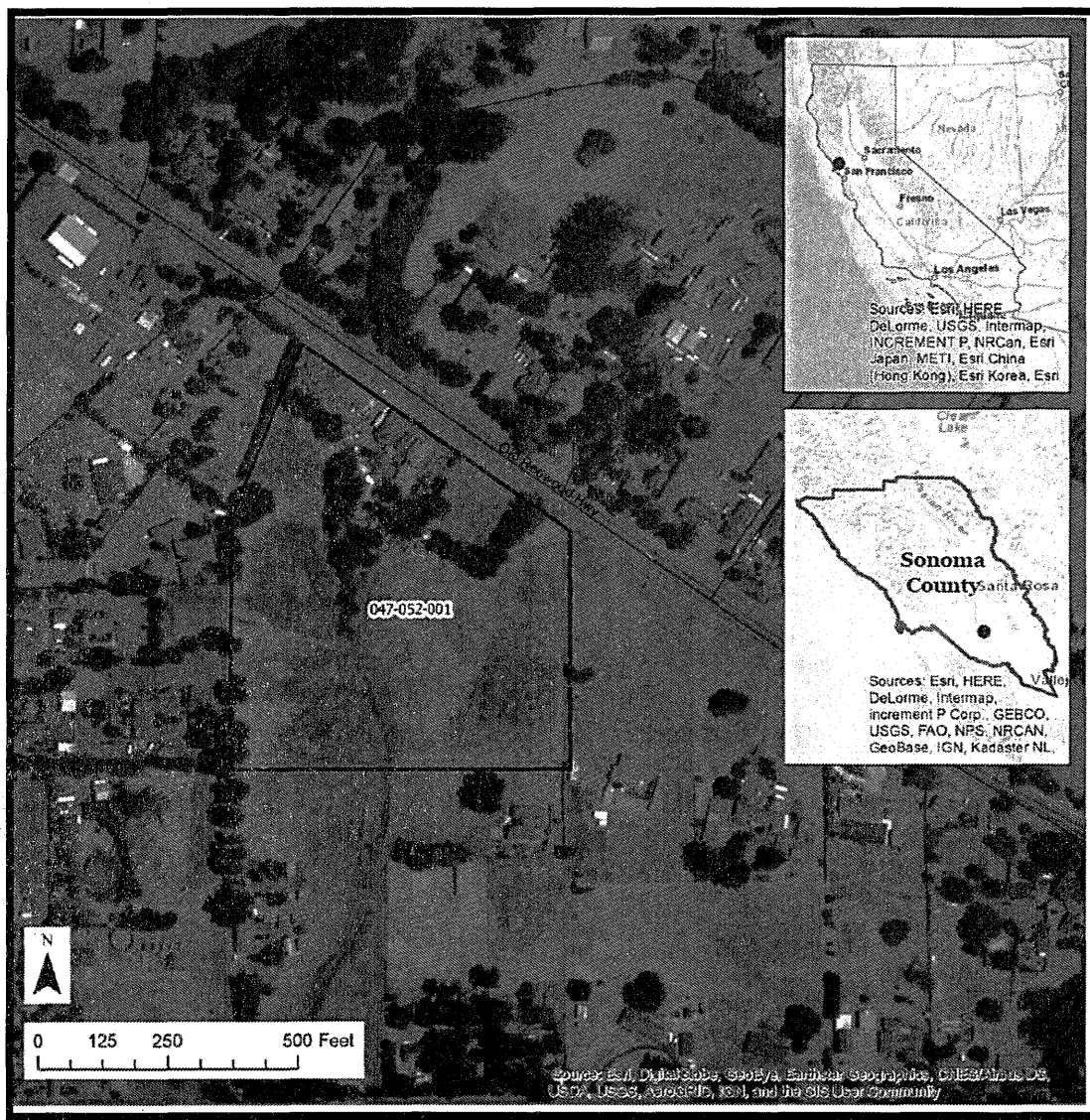
All new structures, excluding vehicle access routes, are located greater than 100 feet from the property lines, and greater than 300 feet from the surrounding residential properties.

Existing trees shall remain in order to continue providing visual screening and to maintain an undisturbed appearance. An effort will be made to blend the grading and landscaping into the natural

terrain to create a native appearance.

The project will use the existing on-site wastewater disposal system (septic system) on a temporary basis. This system, constructed in 1974, was designed to serve the restaurant and existing residence and is currently being used by the existing residence. Because of the age of this system and past history of failure, it is not capable of serving the proposed project on a permanent basis. During Phase 1 operation, the existing system will be subject to regular monitoring by Permit Sonoma Well and Septic staff. A new system will be installed prior to implementing Phase 2 or if monitoring determines the existing system performance is no longer performing adequately.

Figure 1. Location Map



III. PROJECT DESCRIPTION

Bergin University of Canine Studies, formerly the Assistance Dog Institute, is a private, non-profit, post-secondary educational/vocational institution. The primary mission is to educate students to select, train and place service dogs with individuals with mobility and mental disabilities. Bergin University prepares students to work with dog owners to help them manage their dog's problematic behaviors, ultimately reducing the number of dogs that are surrendered to animal shelters.

In addition to or as part of educating students, Bergin University provides dogs to individuals with mobility and mental disabilities, Veterans and first responders with Post-traumatic Stress Disorder and Traumatic Brain Injury and places dogs in schools and group homes with varying needs.

Additionally, Bergin University will hold classes for the general public in: obedience, scent detection and agility classes, and other sporting and recreational activities.

Bergin University for Canine Studies will construct a two phase project to develop a facility to educate people (students) to select, train and place service dogs with individuals with mobility and mental disabilities. Phase 1 of the project is to construct a temporary modular primary school, with open space on the west side of the existing restaurant building to be used for dog walking, exercising and training. Outside areas will have a yard monitor on duty to prevent dog barking.

A new code-compliant septic system will be installed prior to implementing Phase 2

Phase 2 will remove the modular buildings and renovate the existing restaurant to provide permanent training facilities for the project. The property will be fenced in by 7' high cyclone fencing and buried 8" into the ground, preventing dogs from digging under the fence. The fence will have regular openings that are wide enough to allow wildlife passage, but too small for dogs to fit through. The dog kennel areas will be enclosed and exceed Apparent Sound Transmission Class rating of at least 60dB per ASTM E413 – 16 or the standard in effect when construction permits are submitted.

Phase 1 Description

Bergin University of Canine Studies will construct a temporary modular primary school approximately located at the existing parking lots on the south side of the restaurant building. The modular buildings will be used while the existing restaurant building is remodeled for phase 2. The open space in the westerly direction of the site will be used as student and dog walking, exercising and training areas.

The parking lot and courtyard surrounding the modular buildings will be fenced with a 6 foot high ornamental metal fence.

The insides of the dog kennels will be sound-proofed and outside areas will have a yard monitor on duty to prevent dog barking. Dog waste will be cleaned up, stored in airtight containers and disposed of on a weekly basis. Dog feces in outdoor areas will be collected and managed to prevent odors and flies from affecting adjoining properties.

Phase 1 Project Staffing

Four administration staff including President/CEO; Chief Operations Officer; Receptionist/Bookkeeper; and Building/Property Maintenance Manager.

One full time Director of Development/Volunteer Manager staff member.

Three full-time and three part-time University Educational Program staff including Chief Academic Officer; Director of Student Services; Sonisweb Campus Operations Manager; and Adjunct Instructors (part-time).

Two full-time and two part-time Dog Program staff including Dog Wellness and Breeding Manager; Dog Kennel Manager; Client Manager (part-time); and Kennel Maintenance (part-time).

General hours of operations for Phase 1 and 2:

Program class hours are approximately 8:00am-4:30pm Monday-Friday

Administration, development and program/instructional staff are scheduled for 8 hour shifts between 7:00am-6:00pm (special projects may include longer days and weekends)

Kennel employees: Weekday shifts 7:00-8:30am, 6:00-9:00pm, Saturdays, Sundays, holidays: 7:00am-9:00pm

Phase I Staff, Students, and Hours of Operation

Arrival/Departure Times	Number of people	Role
7:00am-8:30pm	1	Staff: Kennel/Maintenance
7:00am-3:30pm	1	Staff: Building/Property Maintenance Mgmt

Arrival/Departure Times	Number of people	Role
7:30am-4:00pm	1	Staff: Chief Operations Officer (COO)
8:00am-4:30pm	5	Staff: Receptionist/Bookkeeper; Sonisweb Programs Assistant; Wellness & Breeding Manager; Director of Development; Dog Kennel Manager
8:30am-11:20am	1	Faculty: Adjunct instructor
8:30am-5:00pm	2	Staff: CAO/Governance; Director of Admissions
9:00am-5:30pm	2	Staff: CEO, Client manager
10:10am-2:20pm	1	Faculty: Adjunct instructor
1:10pm-2:20pm	1	Faculty: Adjunct instructor
Total Faculty and Staff	15	Faculty, staff
8:30am-2:20pm	7	Students: Associates - Aug 19-May 4
9:00am-3:20pm	17	Students: Bachelors - Aug 19-May 4
Total	24	NOTE: Some students also kennel maintenance
8:00am-6:50pm	10	Students: Masters students attend 2-week session – June 17-29
9:00am-4:00pm	10	Students: Summer Seminar – June 3- July 20
Total	20	Students in Summer programs

Phase 2 Description

Prior to implementing Phase 2, a code compliant septic system will be installed and credits purchased to compensate for loss of California Tiger Salamander habitat resulting from installation of the septic system.

The existing restaurant building will be repaired and remodeled and the Phase 1 modular buildings will be removed from the site and all parking facilities that supported the restaurant will be restored. Bergin University of Canine Studies will use the remodeled building as its new training facility.

The property will be entirely fenced in by 7 foot high cyclone fencing and buried 8 inches into the ground, preventing dogs from digging under fences. The fencing will incorporate small pass through sections that will allow for passage of smaller wildlife but not allow dogs to pass through. All entrances and exits will be double gated to reduce the chance of dogs escaping from the facility.

Phase 2 Project Staffing

There will be ten administration staff including President/CEO, Assistant to the President, Chief Operations Officer, Assistant Operations, Chief Financial Officer, Bookkeepers, Receptionist, Building/Property Maintenance Manager and Assistant Building/Property Maintenance Manager.

There will be six Development staff including Director of Development, Assistant Developer, Director of Public Relations Media, Assistant Public Relations, Volunteer Manager, and Assistant Volunteer Manager.

There will be twelve full time and eight part time University Educational Program staff including Chief Academic Officer, Assistant Academic Officer, Director of Student Services, Director of Admissions, Sonisweb Personnel, Full time Instructors and Adjunct Instructors (part time).

There will be twelve full time and ten part time Dog Program and Kennel staff including Breeding Manager, Veterinarian, Client Manager, Assistant Client Manager Dog Wellness Manager, and Breeding Manager, Client Manager (part time), Kennel Manager, Kennel Manager, Assistant Kennel Management, part time Kennel Maintenance, Puppy Parent Manager, and Assistant Puppy Parent Manager.

Phase I Staff, Students, and Hours of Operation

Arrival/Departure Times	Number of people	Role
7:00am-3:30pm	2	Staff: Kennel & Maintenance staff
7:15am	5	Students: Some Associates arrive early to do kennel work.
7:30am-4:00pm	1	Staff: COO

Arrival/Departure Times	Number of people	Role
8:00am-4:30pm	4	Staff: Receptionist, Programs Assistant, Breed Coordinator, Development
8:30am-9:20am	2	Faculty: Adjunct instructor
8:30am-11:20am	1	Faculty: Adjunct instructor
8:30am-5:00pm	2	Staff: Governance, Admissions
8:30am-2:20pm	15	Students: Associates (1st 1/2 students, includes kennel)
9:00am-3:20pm	20	Students: Bachelors (2nd 1/2 student body)
9:00am-5:30pm	3	Staff: CEO, PPH Admin, PPH Client manager
10:10am-2:20pm	1	Faculty: Adjunct instructor
1:10pm-2:20pm	1	Faculty: Adjunct instructor
Total	57	Faculty, staff, students
8:00am-6:50pm	10	Students: Masters students attend 2 week sessions mid-Oct, late-Feb, mid-June
9:00am-4:00pm	14	Students: Summer Seminar – June through mid-July
Total	24	Summer programs

PROJECT SITE AND SURROUNDING LANDS:

The parcel is located at 10201 Old Redwood Highway in Penngrove, CA 94951, with assessor's parcel number 047-052-001. The parcel is 9.68 acres and zoned AR B6 2.5. The parcel is in a zone 3 groundwater availability area.

A 14,000 square foot restaurant and banquet room and approximately 900 square foot single family dwelling are located on the property. Additional accessory structures include miscellaneous sheds/out

buildings and a large water tower supporting numerous telecommunication facilities. The restaurant, previously the Green Mill Inn, is not in operation currently. The façade of the Green Mill Inn will be restored as part of Phase 2 of this project.

A minor riparian corridor runs from the northerly side of the parcel towards the southerly side of the parcel.

Surrounding parcels are developed with single family dwellings on 2-4 acre lots.

Existing Use: The restaurant building is vacant. Behind the vacant restaurant is an 800-square foot single family dwelling, garage, and 100-foot tall water tower that provides water for fire suppression and supports numerous telecommunication facilities.

IV. SETTING

The site is located near the unincorporated community of Penngrove, on Old Redwood Highway equidistant from the cities of Cotati in the northwest and Petaluma to the southeast. Surrounding land uses are predominantly very low density residential development on large lots, pasture land, vineyards, and occasional commercial uses adjoining Old Redwood Highway.

The site is west of Old Redwood Highway and developed with a large building that was formerly used as a restaurant, two parking lots covering approximately 1 acre of the site, a 100-foot tall water tower that stores water for fire protection and supports telecommunication facilities, a 900 square foot single family residence, and numerous small storage buildings. The developed area along Old Redwood Highway covers approximately 3 acres of the 9.68 acre parcel. A line of trees separates the developed area from the undeveloped southern portion of the site.

The site is relatively flat and a drainage channel directs water towards an unnamed tributary of Lichau Creek. The drainage features may be classified as a waters and is potentially subject to U.S. Army Corps of Engineers jurisdiction, North Coast Regional Water Quality Control Board jurisdiction, and California Department of Fish and Wildlife jurisdiction.

The site is located in a Class 3 groundwater area defined by Sonoma County as having marginal groundwater availability and is within the Petaluma Valley Groundwater Basin, a medium-priority basin subject to regulation and planning per the Sustainable Groundwater Management Act (SGMA), administered through the State of California Department of Water Resources.

General Plan Land Use Designation is Rural Residential 2.5 acre density. Zoning is Agriculture and Residential 2.5 acre density, Riparian Corridor 50 foot setback.

Old Redwood Highway between Cotati and Petaluma is identified by the Sonoma County Bicycle and Pedestrian Plan development of Class II bicycle lanes.

V. ISSUES RAISED BY THE PUBLIC OR AGENCIES

A referral packet was drafted and circulated to inform and solicit comments from selected relevant local, state and federal agencies; and to special interest groups that were anticipated to take interest in the project.

Agency Comments

The State Water Resources Control Board Division of Drinking Water – Sonoma District. The Division of Drinking Water commented that a water supply permit application for Bergin University of Canine Studies (Water System No. 4901456) has been received, but the required permit application submittals have not been received by the Division for issuance of a water supply permit. Upon completion and approval of the entire permit application process the Division will issue a water supply permit or a complete permit application letter to Bergin University of Canine Studies indicating that occupancy may proceed.

Tribal Consultation Under AB52

Referrals were sent the following Tribes on 5 June 2018:

Cloverdale Rancheria of Pomo Indians
Dry Creek Rancheria Band of Pomo Indians
Lytton Rancheria of California
Kashia Pomos Stewarts Point Rancheria
Federated Indians of Graton Rancheria
Middletown Rancheria Band of Pomo Indians
Mishewal Wappo Tribe of Alexander Valley

The Federated Indians of Graton Rancheria and Lytton Rancheria of California responded that the project has been reviewed, they had no comments and were not requesting further consultation. No response was received from the other Tribes.

VI. OTHER RELATED PROJECTS

There are no known private or public projects in the area that may affect the proposed project or result in cumulative impacts.

VII. EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts of this project based on the criteria set forth in the State CEQA Guidelines and the County's implementing ordinances and guidelines. For each item, one of four responses is given:

No Impact: The project would not have the impact described. The project may have a beneficial effect, but there is no potential for the project to create or add increment to the impact described.

Less Than Significant Impact: The project would have the impact described, but the impact would not be significant. Mitigation is not required, although the project applicant may choose to modify the project to avoid the impacts.

Potentially Significant Unless Mitigated: The project would have the impact described, and the impact could be significant. One or more mitigation measures have been identified that will

reduce the impact to a less than significant level.

Potentially Significant Impact: The project would have the impact described, and the impact could be significant. The impact cannot be reduced to less than significant by incorporating mitigation measures. An environmental impact report must be prepared for this project.

Each question was answered by evaluating the project as proposed, that is, without considering the effect of any added mitigation measures. The Initial Study includes a discussion of the potential impacts and identifies mitigation measures to substantially reduce those impacts to a level of insignificance where feasible. All references and sources used in this Initial Study are listed in the Reference section at the end of this report and are incorporated herein by reference.

Bergin University of Canine Studies has agreed to accept all mitigation measures listed in this Initial Study as conditions of approval for the proposed project, and to obtain all necessary permits, notify all contractors, agents and employees involved in project implementation and any new owners should the property be transferred to ensure compliance with the mitigation measures.

1. AESTHETICS:

Would the project:

a) Have a substantial adverse effect on a scenic vista?

Comment:

The project is not in an area designated as visually sensitive by the Sonoma County General Plan. Check Open Space and Resource Conservation map and Zoning for SR (Scenic Landscape Unit, Scenic Corridor, Community Separator). It is not located on a scenic hillside, nor would it involve tree removal, construction or grading that would affect a scenic vista. The proposed project will restore the exterior of an existing deteriorating building and landscape existing parking areas. The viewshed of the project area as seen from public roads and parks will not substantially change as a result of the project.

Significance Level:

Less than Significant Impact

b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Comment:

The parcel is not located on a site visible from a state scenic highway.

Significance Level:

No Impact

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Comment:

A large dilapidated building formerly used as a restaurant and two large overgrown parking lots dominate the site as seen from Old Redwood Highway. Numerous deteriorating sheds and storage structures are also visible from Old Redwood Highway. The proposed project will restore the existing restaurant building, landscape the parking areas and remove the deteriorating sheds and storage buildings. The project will improve the overall visual character of the site.

Significance Level:

Less than Significant Impact

d) Create a new source of substantial light or glare which would adversely affect day or nighttime view in the area?

Comment:

All exterior lighting will be replaced and new lighting will be required to conform to the Permit Sonoma standard for exterior lighting:

“All exterior lighting shall be “Dark-sky” compliant and fully shielded to avoid nighttime light pollution. Reference can be made to the International Dark Sky Association website for guidance on exterior lighting: www.darksky.org. All exterior lighting shall be downward facing, located at the lowest possible point to the ground to prevent spill over onto adjacent properties, glare, nighttime light pollution and unnecessary glow in the rural night sky. Light fixtures shall not be located at the periphery of the property and shall not wash out structures on any portions of the project site. Security lighting shall be put on motion sensors. Flood lights and uplights are not permitted. Luminaries shall have a maximum output of 1000 lumens per fixture. Total illuminance beyond the property line, created by simultaneous operation of all exterior lighting, shall not exceed 1.0 lux. Color temperature of exterior light sources shall be 3000 Kelvin or lower.”

Significance Level:

Less than Significant Impact

2. AGRICULTURE AND FOREST RESOURCES:

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

Comment:

The parcel is not designated as Prime or Unique Farmland or Farmland of Statewide Importance on the Important Farmland maps.

Significance Level:

No Impact

- b) **Conflict with existing zoning for agricultural use, or Williamson Act Contract?**

Comment:

The project site is in Agriculture and Residential zoning district which allows limited agricultural activities and processing as a secondary use, and is not included in a Williamson Act contract.

Significance Level:

Less than Significant with Mitigation Incorporated

- c) **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

Comment:

Project is not within a Resource and Rural Development, or Timberland Production District, and does not contain any commercial timber resources.

Significance Level:

No Impact

- d) **Result in the loss of forest land or conversion of forest land to non-forest use?**

Comment:

The project site does not contain any forest or commercial timberlands.

Significance Level:

No Impact

- e) **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use?**

Comment:

The project does not involve other changes in the environment that could result in conversion of farmland to non-agricultural use or forest land to non-forest use.

Significance Level:

No Impact

3. AIR QUALITY:

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

- a) **Conflict with or obstruct implementation of the applicable air quality plan?**

Comment:

The project is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD) (check map at <http://sonomacounty.ca.gov/Air-Quality/Air-Quality-District-Boundaries/>), which is currently designated as a nonattainment area for state and federal ozone standards, the state PM 10 standard, and the state and federal PM 2.5 standard. The District has adopted an Ozone Attainment Plan and a Clean Air Plan in compliance with Federal and State Clean Air Acts. These plans include measures to achieve compliance with both ozone standards. The plans deal primarily with emissions of ozone precursors (nitrogen oxides (NOx) and volatile organic compounds, also referred to as Reactive Organic Gases (ROG)). The project will not conflict with the District's air quality plans because the proposed use is well below the emission thresholds for ozone precursors or involve construction of transportation facilities that are not addressed in an adopted transportation plan (see discussion in 1 (b) below).

Significance Level:

Less than Significant Impact

- b) **Violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

Comment:

State and Federal standards have been established for the "criteria pollutants": ozone, carbon

monoxide, nitrogen dioxide, sulfur dioxide and particulates (PM₁₀ and PM_{2.5}).

The pollutants NO_x (nitrogen oxides) and reactive organic gases (ROG) form ozone in the atmosphere in the presence of sunlight. The principal source of ozone precursors is vehicle emissions, although stationary internal combustion engines are also considered a source.

Following use of the screening criteria for ROG and NO_x, found in the BAAQMD Air Quality Guidelines (Table 3-1), a detailed air quality study is not required, and emissions of criteria pollutants from the project would be less than significant.

Detailed air quality analysis was not required for localized CO concentrations because the project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.

Significance Level:

Less than Significant Impact

- c) **Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

Comment:

The project is within the jurisdiction of the Bay Area Air Quality Management District (check map at <http://sonomacounty.ca.gov/Air-Quality/Air-Quality-District-Boundaries/>), which is currently designated as a nonattainment area for state and federal ozone standards

The project will not have a cumulative effect on ozone because it will not generate substantial traffic which would result in substantial emissions of ozone precursors (ROG and NO_x). See discussion above in 3 (b). The project will have no long-term effect on PM_{2.5} and PM₁₀, because all surfaces will be paved gravel, landscaped or otherwise treated to stabilize bare soils, and dust generation will be insignificant. However, there could be a significant short-term emission of dust (which would include PM_{2.5} and PM₁₀) during construction. These emissions could be significant at the project level, and could also contribute to a cumulative impact.

Although the project will generate some ozone precursors from new vehicle trips (discuss project trip generation if applicable), the project will not have a cumulative effect on ozone because it will not generate substantial traffic resulting in significant new emissions of ozone precursors (ROG and NO_x). See discussion in 3 (b) above.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measure AIR-1:

The following dust control measures shall be included in the project:

1. Water or alternative dust control method shall be sprayed to control dust on construction areas, soil stockpiles, and staging areas during construction as directed by the County.
2. Trucks hauling soil, sand and other loose materials over public roads will cover the loads, or will keep the loads at least two feet below the level of the sides of the container, or will wet the load sufficiently to prevent dust emissions.
3. Paved roads will be swept as needed to remove soil that has been carried onto them from the project site.

Mitigation Monitoring:

Mitigation Monitoring AIR-1:

PRMD staff shall ensure that the measures are listed on all site alteration, grading, building or improvement plans prior to issuance of grading or building permits.

d) Expose sensitive receptors to substantial pollutant concentrations?

Comment:

There are no sensitive receptors are located near the proposed construction areas for the project, and the project would not expose sensitive receptors to significant concentrations of pollutants because of the analysis above in 1 (b) and 1(c).

Although there will be no long term increase in emissions; during construction there could be significant short term dust emissions that would affect nearby residents. Dust emissions can be reduced to less than significant by the mitigation measure described in item 3c above.

Significance Level:

Less than Significant Impact

e) Create objectionable odors affecting a substantial number of people?

Comment:

Under BAAQMD Guidelines, the project is not an odor generating use, nor located near an odor generating source that may affect the use, and would have no odor impact.

Construction equipment may generate odors during project construction. The impact would be less than significant as it would be a short-term impact that ceases upon completion of the project.

The project will generate dog feces, which has potential to create objectionable odors if not properly managed. Dog waste will be cleaned up, stored in airtight containers and disposed of on a weekly basis. Dog feces in outdoor areas will be collected and managed to prevent odors and flies

from affecting adjoining properties. containers for at least weekly removal to the landfill.

Significance Level:

Less than Significant Impact

4. BIOLOGICAL RESOURCES:

Would the project:

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Comment:

Regulatory Framework

Special-Status Species

Special-status species include those plant and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the federal Endangered Species Act (ESA) or California Endangered Species Act (CESA). These acts afford protection to both listed and proposed species. In addition, California Department of Fish and Wildlife (CDFW) Species of Special Concern, which are species that face extirpation in California if current population and habitat trends continue, U.S. Fish and Wildlife Service (The Service) Birds of Conservation Concern, and CDFW special-status invertebrates, are all considered special-status species. Although CDFW Species of Special Concern generally have no special legal status, they are given special consideration under the California Environmental Quality Act (CEQA). In addition to regulations for special-status species, most birds in the United States, including non-status species, are protected by the Migratory Bird Treaty Act of 1918. Plant species on California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants with California Rare Plant Ranks (Rank) of 1 and 2 are also considered special-status plant species and must be considered under CEQA. Bat species designated as "High Priority" by the Western Bat Working Group (WBWG) qualify for legal protection under Section 15380(d) of the CEQA Guidelines. Species designated High Priority" are defined as "imperiled or are at high risk of imperilment based on available information on distribution, status, ecology and known threats.

Endangered Species Act

The Endangered Species Act (ESA) of 1973, as amended (16 USC 1531 *et seq.*) was enacted to provide a means to identify and protect endangered and threatened species. Under the Section 9 of the ESA, it is unlawful to take any listed species. "Take" is defined as harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting a listed species. "Harass" is defined as an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering. "Harm" is defined as an act which

actually kills or injures fish or wildlife and may include significant habitat modification or degradation which actually kills or injures fish or wildlife by significantly impairing essential behavioral patterns, including breeding, spawning, rearing, migrating, feeding, or sheltering. Actions that may result in "take" of a federal-listed species are subject to The Service or National Marine Fisheries Service (NOAA Fisheries) permit issuance and monitoring. Section 7 of ESA requires federal agencies to ensure that any action authorized, funded, or carried out by the agency is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of designated critical habitat for such species. Any action authorized, funded, or carried out by a federal agency or designated proxy (e.g., Army Corps of Engineers) which has potential to affect listed species requires consultation with The Service or NOAA Fisheries under Section 7 of the ESA.

Critical Habitat

Critical habitat is a term defined in the ESA as a specific geographic area that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection. The ESA requires federal agencies to consult with the USFWS to conserve listed species on their lands and to ensure that any activities or projects they fund, authorize, or carry out will not jeopardize the survival of a threatened or endangered species. In consultation for those species with critical habitat, federal agencies must also ensure that their activities or projects do not adversely modify critical habitat to the point that it will no longer aid in the species' recovery. In many cases, this level of protection is similar to that already provided to species by the ESA jeopardy standard. However, areas that are currently unoccupied by the species but which are needed for the species' recovery are protected by the prohibition against adverse modification of critical habitat.

California Department of Fish and Wildlife (CDFW) maintains three lists of species of special concern including U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern, sensitive species included in USFWS Recovery Plans, and CDFW special-status invertebrate that serve as "watch" lists. These species are considered during the environmental review process but do not receive statutory protection under the California Endangered Species Act although they may be protected under other state and federal laws. California Species of Concern receive no legal protection but may also be considered during the environmental review process and most are protected under state and federal law.

Project Evaluation

A biological resource evaluation for the project in May of 2018 was prepared by Lucy Macmillian. While this report focused on a two acre portion of the project site that will be developed with parking and structures to be used for the proposed facility, the entire site was evaluated for special-status plant and wildlife species and sensitive habitats (including wetlands and creeks) that have the potential to occur on or in the vicinity of the project and to determine if the proposed development will affect these resources.

Wetlands

On 28 March 2018, a preliminary wetlands delineation of the project site utilizing the methods and procedures prescribed in the 1987 *Arid West supplement and Corps of Engineers Federal Manual*.

One natural drainage channel was identified on the western wedge of project site but this channel is outside the proposed improvement area. The channel measures approximately 4-6 feet wide where it terminates at the northern parking lot and is culverted under the parking lot and Old Redwood Highway. There is a concrete headwall at the inlet for the channel just west of the parking lot. Vegetation associated with the channel includes non-native blackberry (*Rubus armeniacus*), Coast live oak (*Quercus agrifolia*), and willow (*Salix* sp.). Water was flowing in the creek at the time of survey at a depth of approximately 2 inches.

Two man-made drainage ditches were observed on the backside of the various buildings. These ditches appear to be intended to divert stormwater, but were dry at the time of survey. One of these ditches is located between the existing inn and southernmost parking lot and drains towards the water tank and then takes a sharp turn to the north. The ditch connects to a second ditch via a culvert and then drains into a tributary of Lichau Creek.

This tributary to Lichau Creek may be classified as a waters and is potentially subject to U.S. Army Corps of Engineers jurisdiction, North Coast Regional Water Quality Control Board jurisdiction, and California Department of Fish and Wildlife jurisdiction. Potential impacts to the tributary would need to be mitigated in accordance with these agencies requirements. However, the project does not propose to alter the drainage ditches or existing culverts.

Special Status Plants

In addition to species listed by USFWS and CDFW, plant species on California Native Plant Society (CRPR) Lists 1 and 2 are also considered special status plant species and must be considered under CEQA.

Most of the proposed project area is existing hardscape, compacted gravel, and structures that lacks potential to provide habitat for special-status plants. The southern portion of the site that will be used for outdoor training and installation of a new septic system consists of non-native grasslands used for pasture, and disturbed areas with ornamental plantings and other invasive plant species. While no special status plants have been identified in this area, there may be occurrences of special status wildlife as discussed below. The drainage channel on the western portion of the site is considered a riparian corridor and therefore is considered a sensitive habitat. However, the project does not propose development in or near the drainage channel.

Table 1. Special-status plant species with potential to occur within project site.

Listing status:

Federal (USFWS 2017a): FE – endangered; FT – threatened

State of California (CDFW 2017): SE– endangered; ST – threatened; SR – rare

California Rare Plant Rank (CRPR) (CNPS 2017):

CRPR 1A: Presumed extinct in California.

CRPR 1B: Rare, Threatened, or Endangered in California and elsewhere.

CRPR 2A: Presumed extinct in California, more common elsewhere

CRPR 2B: Rare, Threatened, or Endangered in California, more common elsewhere.

CRPR 3: Plants about which more information is needed.

CRPR Threat Code extensions:

1: Seriously endangered in California.

2: Fairly endangered in California.

3 Not very endangered in California.

In habitat descriptions, “?” indicates a discrepancy in habitat information between standard references (CNDDDB; Baldwin et al. 2012; CNPS 2010)

Plant Species	Status	Habitat	Potential for Occurrence
Franciscan onion (<i>Allium peninsulare</i> var. <i>franciscanum</i>)	CRPR 1B.2	Clay soil, volcanic or serpentine substrate; cismontane woodland, valley and foothill grassland.	Suitable soils or substrate not present on site No Potential in Study Area
Sonoma alopecurus (<i>Alopecurus aequalis</i> var. <i>sonomensis</i>)	FE, CRPR 1B.1	Wet places; freshwater marshes and swamps, riparian scrub, streambanks in valley and foothill grassland.	Suitable habitat may occur in drainage channel but no proposed improvements in drainage channel No Potential in Study Area
Napa false indigo (<i>Amorpha californica</i> var. <i>napensis</i>)	CRPR 1B.2	Broadleaved upland forest, chaparral; cismontane woodland, North Coast coniferous forest.	No suitable habitat occurs in survey area. Conspicuous shrub observable but not observed at time of No Potential in Study Area
Bent-flowered fiddleneck (<i>Amsinckia lunaris</i>)	CRPR 1B.2	Coastal bluff scrub, cismontane woodland, valley and foothill grassland, openings in broadleaved upland forest.	Suitable substrate probably not present in survey area. No Potential in Study Area
Sonoma manzanita (<i>Arctostaphylos</i> <i>canescens</i> ssp. <i>sonomensis</i>)	CRPR 1B.2	Sometimes serpentine substrate; chaparral, lower montane coniferous forest.	No suitable habitat occurs in survey area. No Potential in Study Area
Vine Hill manzanita (<i>Arctostaphylos</i> <i>densiflora</i>)	SE, CRPR 1B.1	Acid marine sandy or sandy clay soil; maritime chaparral.	No suitable habitat occurs in survey area. No Potential in Study Area
Rincon manzanita (<i>Arctostaphylos</i> <i>stanfordiana</i> ssp. <i>decumbens</i>)	CRPR 1B.1	Red rhyolitic substrate; chaparral, cismontane woodland.	No suitable habitat occurs in survey area. No Potential in Study Area

Plant Species	Status	Habitat	Potential for Occurrence
Clara Hunt's milk-vetch (<i>Astragalus claranus</i>)	FE, ST, CRPR 1B.1	Rocky open, generally exposed places, clay soil, serpentine or And, valley and foothill grassland, openings in chaparral.	No suitable habitat occurs in survey area. No Potential in Study Area
Alkali milk-vetch (<i>Astragalus tener</i> var. <i>tener</i>)	CRPR 1B.2	Alkaline, often adobe clay soil; playas, vernal pools, alkali flats within valley and foothill grassland, coastal salt marsh.	No suitable habitat occurs in survey area. No Potential in Study Area
Big-scale balsamroot (<i>Balsamorhiza macrolepis</i>)	CRPR 1B.2	Chaparral, cismontane woodland, valley and foothill grassland, sometimes serpentine substrate.	No suitable habitat occurs in survey area. No Potential in Study Area
Sonoma sunshine (<i>Blennosperma bakeri</i>)	FE, SE, CRPR 1B.1	Vernally moist to inundated places; vernal pools, valley and foothill grassland.	No suitable habitat occurs in survey area. No Potential in Study Area
Narrow-anthered brodiaea (<i>Brodiaea leptandra</i> [<i>B. californica</i> var. <i>leptandra</i>])	CRPR 1B,2	Gravelly soil (?), volcanic substrate (?); broadleaved upland forest, chaparral, cismontane woodland, lower montane coniferous forest, valley and foothill grassland.	Suitable substrate and soil type not present in survey area. No Potential in Study Area
Thurber's reed grass (<i>Calamagrostis crassiglumis</i>)	CRPR 2B.1	Moist to wet places; coastal scrub, freshwater marsh.	Marginally suitable habitat may occur in drainage ditch Low Potential in Study Area
Round-leaved filaree (<i>California macrophylla</i> [= <i>Erodium macrophyllum</i>])	CRPR 1B.2	Clay soil; cismontane woodland, valley and foothill grassland.	No suitable habitat occurs in survey area. No Potential in Study Area
Swamp harebell (<i>Campanula californica</i>)	CRPR 1B.2	Wet, boggy places; bogs and fens, closed-cone coniferous forest, coastal prairie, meadows and seeps, freshwater marshes, North Coast coniferous forest.	No suitable habitat occurs in survey area. No Potential in Study Area
Pitkin Marsh paintbrush (<i>Castilleja uliginosa</i>)	SE, CRPR 1A	Freshwater marsh.	No suitable habitat occurs in survey area. No Potential in Study Area
Rincon Ridge ceanothus (<i>Ceanothus confusus</i>)	CRPR 1B.1	Dry sites, volcanic or serpentine substrate; closed-cone coniferous forest, chaparral, cismontane woodland.	No suitable habitat occurs in survey area. No Potential in Study Area
Calistoga ceanothus (<i>Ceanothus divergens</i>)	CRPR 1B.2	Rocky places, serpentine or volcanic substrate; chaparral, cismontane woodland.	No suitable habitat occurs in survey area. No Potential in Study Area
Vine Hill ceanothus (<i>Ceanothus foliosus</i> var. <i>vineatus</i>)	CRPR 1B.1	Sandy (and rocky?) acidic soil; chaparral, cismontane woodland (?), broadleaved evergreen forest (?).	No suitable habitat occurs in survey area. No Potential in Study Area

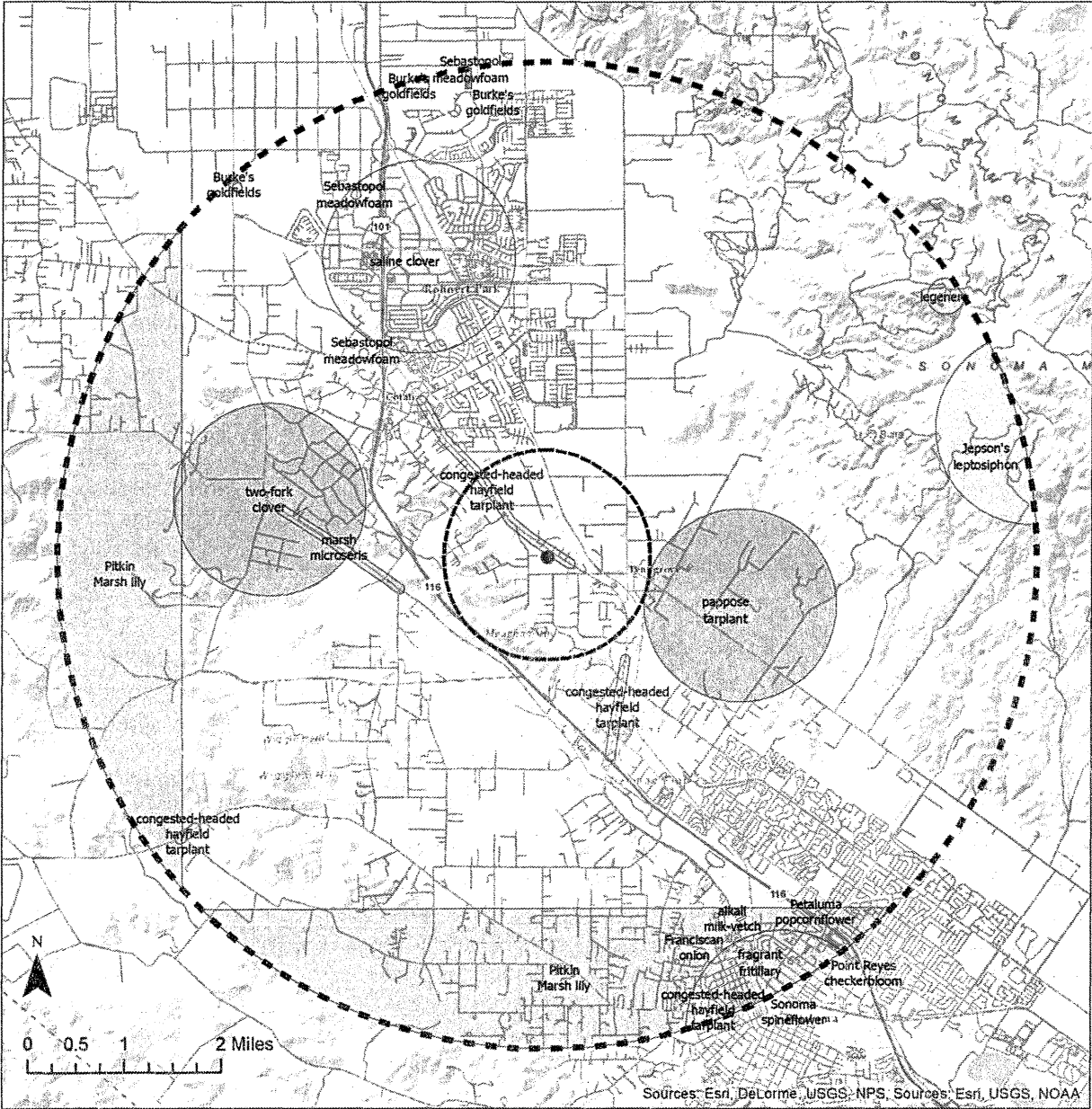
Plant Species	Status	Habitat	Potential for Occurrence
Mason's ceanothus (<i>Ceanothus masonii</i>)	SR, CRPR 1B.2	Rocky places, serpentine substrate; openings in chaparral.	No suitable habitat occurs in survey area. No Potential in Study Area
Holly-leaved ceanothus (<i>Ceanothus purpureus</i>)	CRPR 1B.2	Rocky soil, volcanic substrate; chaparral, cismontane woodland.	No suitable habitat occurs in survey area. No Potential in Study Area
Sonoma ceanothus (<i>Ceanothus sonomensis</i>)	CRPR 1B.2	Sandy soil, serpentine or volcanic substrate; chaparral.	No suitable habitat occurs in survey area. No Potential in Study Area
Pappose tarplant (<i>Centromadia [Hemizonia] parryi ssp. parryi</i>)	CRPR 1B.2	Vernally moist sites, often alkaline soil; chaparral, coastal prairie, meadows, coastal salt marshes, valley and foothill grassland.	No suitable habitat occurs in survey area. No Potential in Study Area
Point Reyes bird's- beak (<i>Chloropyron maritimum ssp. palustre</i>)	CRPR 1B.2	Coastal salt marshes.	No suitable habitat occurs in survey area. No Potential in Study Area
Soft bird's beak (<i>Chloropyron molle ssp. molle</i>)	FE, SR, CRPR 1B.2	Coastal salt marshes.	No suitable habitat occurs in survey area. No Potential in Study Area
Sonoma spineflower (<i>Chorizanthe valida</i>)	FE, SE, CRPR 1B.1	Sandy soil, coastal prairie.	No suitable habitat occurs in survey area. No Potential in Study Area
Franciscan thistle (<i>Cirsium andrewsii</i>)	CRPR 1B.2	Moist places, sometimes serpentine substrate; broadleafed upland forest, coastal bluff scrub, coastal prairie, coastal scrub.	No suitable habitat occurs in survey area. No Potential in Study Area
Peruvian dodder (<i>Cuscuta obtusiflora var. glandulosa</i>)	CRPR 2B.2	Parasitic on herbs including <i>Alternanthera</i> spp., <i>Dalea</i> spp., loosestrife (<i>Lythrum</i> spp.), knotweed (<i>Polygonum</i> spp.), and cocklebur/lotbur (<i>Xanthium</i> spp.); freshwater marsh.	Marginally suitable habitat may occur on drainage ditch on site. Low Potential in Study Area
Baker's larkspur (<i>Delphinium bakeri</i>)	FE, SE, CRPR 1B.1	Decomposed shale substrate; broadleafed upland forest, coastal scrub, valley and foothill grassland, possibly sometimes disturbed areas (e.g. fencelines).	No suitable habitat occurs in survey area. No Potential in Study Area
Golden larkspur (<i>Delphinium luteum</i>)	FE, SR, CRPR 1B.1	± moist places, rocky soil, generally north- facing slopes; chaparral, coastal prairie, coastal scrub.	No suitable habitat occurs in survey area. No Potential in Study Area
Dwarf downingia (<i>Downingia pusilla</i>)	CRPR 2B.2	Vernal pools, vernal moist places in valley and foothill grassland, sometimes ditches.	Suitable habitat may occur in drainage ditch on site. Low Potential in Study Area

Plant Species	Status	Habitat	Potential for Occurrence
Streamside daisy (<i>Erigeron biolettii</i>)	CRPR 3	Rocky soil, sometimes ledges along rivers; broadleaved upland forest, cismontane woodland, North Coast coniferous forest.	No suitable habitat occurs in survey area. No Potential in Study Area
Tiburon buckwheat (<i>Eriogonum luteolum</i> var. <i>caninum</i>)	CRPR 1B.2	Sandy or gravelly soil, serpentine substrate; chaparral, coastal prairie, valley and foothill grassland, cismontane woodland.	No suitable habitat occurs in survey area. No Potential in Study Area
Marin checker lily (<i>Fritillaria lanceolata</i> var. <i>tristulis</i>)	CRPR 1B.1	Sometimes rock outcrops, often serpentine substrate; coastal bluff scrub, coastal prairie, coastal scrub, riparian habitats (?).	Suitable habitat does not occur in survey area. Known only from habitats nearer immediate coast. Not known to occur in Sonoma County. No Potential in Study Area
Fragrant fritillary (<i>Fritillaria liliacea</i>)	CRPR 1B.2	Generally heavy clay soil, often serpentine substrate; cismontane woodland, coastal prairie, coastal scrub, valley and foothill grassland.	Suitable soil type probably not present in survey area. Low Potential in Study Area
Woolly-headed gilia (<i>Gilia capitata</i> ssp. <i>tomentosa</i>)	CRPR 1B.1	Rocky places, rock outcrops, serpentine substrate; coastal bluff scrub, valley and foothill grassland.	No suitable habitat occurs in survey area. No Potential in Study Area
Congested-headed hayfield tarplant (<i>Hemizonia congesta</i> ssp. <i>congesta</i>)	CRPR 1B.2	Grassy places, often disturbed areas, fallow fields, other ruderal areas; valley and foothill grassland, coastal scrub.	Marginally suitable habitat occurs in survey area. Low Potential in Study Area
Marin western flax (<i>Hesperolinon congestum</i>)	FT, ST, CRPR 1B.1	Sometimes barrens, serpentine substrate; valley and foothill grassland, chaparral.	No suitable habitat occurs in survey area. No Potential in Study Area
Thin-lobed horkelia (<i>Horkelia tenuiloba</i>)	CRPR 1B.2	Moist places, open areas, sandy soil; broadleaved upland forest, chaparral, coastal scrub, valley and foothill grassland.	Suitable habitat probably does not occur on project site Low Potential in Study Area
Burke's goldfields (<i>Lasthenia burkei</i>)	FE, SE, CRPR 1B.1	Wet or moist (at least vernal) places; generally vernal pools and swales, sometimes meadows.	Suitable habitat unlikely Low Potential in Study Area
Baker's goldfields (<i>Lasthenia californica</i> ssp. <i>bakeri</i>)	CRPR 1B.2	Open places; closed-cone coniferous forest, coastal scrub, meadows, marshes and swamps.	No suitable habitat occurs in survey area. No Potential in Study Area
Contra Costa goldfields (<i>Lasthenia conjugens</i>)	FE, CRPR 1B.1	Vernally moist, open, low-lying places, sometimes alkaline soil; vernal pools, wet meadows, valley and foothill grassland, cismontane woodland, alkaline playas.	Suitable habitat probably does not occur on project site Low Potential in Study Area
Colusa layia (<i>Layia septentrionalis</i>)	CRPR 1B.2	Sandy or serpentine soil; chaparral, cismontane woodland, valley and foothill grassland.	No suitable habitat occurs in survey area. No Potential in Study Area

Plant Species	Status	Habitat	Potential for Occurrence
Legenere (<i>Legenere limosa</i>)	CRPR 1B.1	Vernal pools and swales.	No suitable habitat occurs in survey area. No Potential in Study Area
Jepson's leptosiphon (<i>Leptosiphon [Linanthus] jepsonii</i>)	CRPR 1B.2	Usually volcanic soil (sometimes periphery of serpentine), chaparral, cismontane woodland.	No suitable habitat occurs in survey area. No Potential in Study Area
Woolly-headed lessingia (<i>Lessingia hololeuca</i>)	CRPR 3	Clay or serpentine soil, broadleafed upland forest, coastal scrub, lower montane coniferous forest, valley and foothill grassland.	No suitable habitat occurs in survey area. No Potential in Study Area
Pitkin marsh lily (<i>Lilium pardalinum ssp pitkinense</i>)	FE, SE, CRPR 1B.1	Saturated places, sandy soil; cismontane woodland, meadows and seeps, freshwater marshes.	No suitable habitat occurs in survey area. No Potential in Study Area
Sebastopol meadowfoam (<i>Limnanthes vincularis</i>)	FE, SE; CRPR 1B.1	Seasonally wet places, poorly drained, clay or sandy soil; meadows, valley and foothill grassland, vernal pools.	No suitable habitat occurs in survey area. No Potential in Study Area
Mt. Diablo cottonweed (<i>Micropus amphibolus</i>)	CRPR 3.2	Sparsely vegetated places, rocky soil; broadleafed upland forest, chaparral, cismontane woodland, valley and foothill grassland, coastal prairie.	No suitable habitat occurs in survey area. No Potential in Study Area
Marsh microseris (<i>Microseris paludosa</i>)	CRPR 1B.2	Closed-cone coniferous forest, cismontane woodland, coastal scrub, valley and foothill grassland.	No suitable habitat occurs in survey area. No Potential in Study Area
Baker's navarretia (<i>Navarretia leucocephala ssp. bakeri</i>)	CRPR 1B.1	Seasonally moist places, cismontane woodland, meadows and seeps, vernal pools, valley and foothill grassland, lower montane coniferous forest.	Suitable habitat probably does not occur on project site Low Potential in Study Area
Many-flowered navarretia (<i>Navarretia leucocephala ssp. plieantha</i>)	FE, SE, CRPR 1B.2	Volcanic ash flow vernal pools.	No suitable habitat occurs in survey area. No Potential in Study Area
Sonoma beardtongue (<i>Penstemon newberryi</i> var. <i>sonomensis</i>)	CRPR 1B.3	Rocky places, generally rock outcrops or talus; chaparral.	No suitable habitat occurs in survey area. No Potential in Study Area
Petaluma popcorn-flower (<i>Plagiobothrys mollis</i> var. <i>vestitus</i>)	CRPR 1A	Wet places; valley and foothill grassland, coastal salt marshes (?).	No suitable habitat occurs in survey area. No Potential in Study Area
North Coast semaphore grass (<i>Pleuropogon hooverianus</i>)	ST, CRPR 1B.1	Moist to wet, open or partly shaded places; broadleafed upland forest, meadows and seeps, North Coast coniferous forest, freshwater marsh.	Suitable habitat probably does not occur on project site Low Potential in Study Area

Plant Species	Status	Habitat	Potential for Occurrence
Marin knotweed (<i>Polygonum marinense</i>)	CRPR 3.1	Coastal salt or brackish marshes.	No suitable habitat occurs in survey area. No Potential in Study Area
Cunningham Marsh cinquefoil (<i>Potentilla uliginosa</i>)	CRPR 1A	Permanent oligotrophic (low-nutrient) wetlands; freshwater marsh.	No suitable habitat occurs in survey area. No Potential in Study Area
White beaked-rush (<i>Rhynchospora alba</i>)	CRPR 2B.2	Wet places; bogs and fens (including sphagnum bogs), meadows and seeps, freshwater marshes and swamps.	No suitable habitat occurs in survey area. No Potential in Study Area
California beaked-rush (<i>Rhynchospora californica</i>)	CRPR 1B.1	Wet, generally open places; bogs and fens, lower montane coniferous forest, freshwater seeps, freshwater marshes and swamps.	No suitable habitat occurs in survey area. No Potential in Study Area
Brownish beaked-rush (<i>Rhynchospora capitellata</i>)	CRPR 2B.2	Moist to wet places; lower and upper montane coniferous forest, meadows and seeps, marshes and swamps.	No suitable habitat occurs in survey area. No Potential in Study Area
Round-headed beaked-rush (<i>Rhynchospora globularis</i>)	CRPR 2B.1	Freshwater marsh.	No suitable habitat occurs in survey area. No Potential in Study Area
Point Reyes checkerbloom (<i>Sidalcea calycosa</i> ssp. <i>rhizomata</i>)	CRPR 1B.2	Freshwater marsh.	No suitable habitat occurs in survey area. No Potential in Study Area
Kenwood Marsh checkerbloom (<i>Sidalcea oregana</i> ssp. <i>valida</i>)	FE, SE, CRPR 1B.1	Freshwater marsh, especially edges.	No suitable habitat occurs in survey area. No Potential in Study Area
Two-fork clover (<i>Trifolium amoenum</i>)	FE, CRPR 1B.1	Moist open sites, heavy soil, sometimes serpentine substrate, sometimes roadsides or eroded areas; coastal bluff scrub, valley and foothill grassland.	No suitable habitat occurs in survey area. No Potential in Study Area
Santa Cruz clover (<i>Trifolium buckwestiorum</i>)	CRPR 1B.1	Seasonally moist places, sometimes disturbed areas; coastal prairie, margins of cismontane woodland and broadleaved upland forest.	Suitable habitat probably does not occur on project site Low Potential in Study Area
Saline clover (<i>Trifolium hydrophilum</i>)	CRPR 1B.2	Moist or seasonally moist sites, alkaline or saline soil; marshes and swamps (including coastal salt marshes?), valley and foothill grassland, vernal pools.	Suitable habitat probably does not occur on project site Low Potential in Study Area
San Francisco owl's-clover (<i>Triphysaria floribunda</i>)	CRPR 1B.2	Usually serpentine substrate; coastal prairie, coastal scrub, valley and foothill grassland.	No suitable habitat occurs in survey area. No Potential in Study Area
Oval-leaved viburnum (<i>Viburnum ellipticum</i>)	CRPR 2B.3	Often north-facing slopes; chaparral, cismontane woodland, lower montane coniferous forest.	No suitable habitat occurs in survey area. No Potential in Study Area

Figure 4. Special Status Plant Species within 1 Mile and 5 Miles of the Project Site



Sources: Esri, DeLorme, USGS, NPS, Sources: Esri, USGS, NOAA

- | | | |
|----------------------------|--------------------------------|--|
| ● Project Location | ▨ Petaluma popcornflower (1) | ▨ congested-headed hayfield tarplant (4) |
| ⊖ 1-Mile Buffer | ▨ Pitkin Marsh lily (2) | ▨ fragrant fritillary (1) |
| ⊖ 5-Mile Buffer | ▨ Point Reyes checkerbloom (1) | ▨ legenere (1) |
| — Roads and Streets | ▨ Sebastopol meadowfoam (3) | ▨ marsh microseris (1) |
| ▨ Burke's goldfields (3) | ▨ Sonoma spineflower (1) | ▨ pappose tarplant (1) |
| ▨ Franciscan onion (1) | ▨ Sonoma sunshine (2) | ▨ saline clover (1) |
| ▨ Jepson's leptosiphon (1) | ▨ alkali milk-vetch (1) | ▨ two-fork clover (1) |

Special Status Wildlife

The following sources were reviewed to determine which special-status wildlife species have been documented to occur in the surrounding 5-mile vicinity of the Project Site:

- California Natural Diversity Database (CNDDDB) records and Spotted Owl Viewer (CDFW 2018)
- USFWS Information for Planning and Conservation Species Lists (USFWS 2018)
- CDFG publication "California's Wildlife, Volumes I-III" (Zeiner et al. 1990)
- CDFG publication *California Bird Species of Special Concern* (Shuford and Gardali 2008)
- CDFW and University of California Press publication *California Amphibian and Reptile Species of Special Concern* (Thomson et al. 2016)

A reconnaissance-level survey for special status wildlife species on and adjacent to the Study Area on March 29, 2018. This survey identified if suitable habitat elements for each of the special status species documented in the project vicinity are present within the project site and if implementation of the proposed project has potential to result in impacts to any of these species and/or their habitats either on- or off-site. Habitat elements examined included the presence of: dispersal habitat, foraging habitat, refugia or estivation habitat, and breeding (or nesting) habitat.

Seventeen special-status wildlife species have been documented within five miles of the Project Site (Figure 5), but a number of these species are likely absent due to lack of suitable aquatic habitat (for vernal pool crustaceans, fish and aquatic insects) and/or suitable riparian habitat for western yellow-billed cuckoo. Foothill yellow-legged frog is not likely present within the tributary to Lichau Creek due to a lack of contiguous suitable gravel/cobble habitat needed for their survival. Unlike other amphibians, foothill yellow-legged frog spends limited time in upland habitats and is not known to make overland movements during dispersal events. The single burrowing owl and tricolored blackbird colony observations are more than 15 years old, and there have been no subsequent sightings. Burrowing owl is presumed to be extirpated from the County except for the occasional winter migrant, and no suitable nesting habitat is present for tricolored blackbird.

The following species have potential to be present on the project site:

- Pacific pond turtle
- California red-legged frog
- California tiger salamander
- American badger
- Pallid bat
- Townsend's western big-eared bat

Pacific (Western) pond turtle (*Actinemys marmorata*):
CDFW Species of Special Concern.

The Pacific pond turtle is the only native freshwater turtle in California. Pacific pond turtles inhabit perennial aquatic habitats, such as lakes, ponds, rivers, streams, and canals that provide submerged cover and suitable basking structures, such as rocks and logs. Pacific pond turtles prefer to nest on unshaded upland slopes close to their aquatic habitat, and hatchlings require shallow water with relatively dense emergent and submergent vegetation for foraging for aquatic invertebrates.

The on-site tributary contains suitable dispersal habitat for Pacific pond turtle and there are several occurrences surrounding the site, including one within one mile. However, due to lack of connectivity and seasonal nature of the aquatic habitat, it is unlikely to host pond turtle year-round. This species may potentially nest in upland habitat in the southern portion of the project site.

California Red-legged Frog (*Rana draytonii*):
Federal Threatened Species, CDFW Species of Special Concern.

The Project Site is not within designated critical habitat for this species, but the on-site tributary of Lichau Creek may contain suitable aquatic non-breeding and/or dispersal habitat. Due to lack of connectivity and seasonal nature of the aquatic habitat, no breeding is likely to occur on-site. There are several documented occurrences within two miles of the site; none are recorded within the known dispersal distance. It is unlikely that California Red-legged Frog occur on the site, but presence cannot be ruled out and the species may disperse through the site during extended rain events. California Red-legged Frog is not likely to be present on-site during the summer months.

California Tiger Salamander (*Ambystoma californiense*) Sonoma County Distinct Population Segment:
Federal Endangered Species, State Threatened Species.

Critical Habitat for California Tiger Salamander (CTS) in the Santa Rosa Plain inhabits low-elevation (below 500 feet) vernal pools and seasonal pools, associated grassland, and the grassy understory of oak savannah plant communities. CTS breed in natural ephemeral pools, or ponds that mimic ephemeral pools (stock ponds that go dry), and occupy substantial areas surrounding the breeding pool as adults. CTS spend most of their time in the grasslands surrounding breeding pools. They survive hot, dry summers by living underground in burrows (such as those created by ground squirrels and other mammals and deep cracks or holes in the ground) where the soil atmosphere remains near the water saturation point. During wet periods, the salamanders may emerge from refugia and feed in the surrounding grasslands. CTS may disperse into uplands up to 1.3 miles from breeding ponds.

There are multiple occurrences surrounding the project site with the nearest being within one mile (though greater than 2,200 feet). The site is also within designated critical habitat. Exercise areas and the new septic system that will be installed prior to Phase 2 are in an area with potential to provide potential upland habitat to CTS. Additionally, CTS may breed in the on-site creek where emergent vegetation is present.

American badger (*Taxidea taxus*):
CDFW Species of Special Concern.

The American badger is a large, semi-fossorial member of the Mustelidae (i.e. weasel family). It is found uncommonly within the region in drier open stages of most scrub, forest, and herbaceous habitats where friable soils and prey populations are present. Badgers are typically solitary and nocturnal, digging burrows to provide refuge during daylight hours. Burrow entrances are usually elliptical (rather than round), and each burrow generally has only one entrance. Young are born in the spring and independent by the end of summer. Badgers are aggressive carnivores, preying on a variety of fossorial mammals (especially ground squirrels) and occasionally other vertebrates and their eggs. Home ranges for this species to be large, depending on the habitat available; population density averages one badger per square mile in prime open country.

Suitable grassland habitat is present in the southern pasture area that will be used for outdoor training and development of the septic system. There are also multiple recorded occurrences surrounding the site and suitable foraging habitat is present, indicating there is a high potential for this species to be present.

Pallid bat (*Antrozous pallidus*) and Townsend's western big-eared bat, (*Corynorhinus townsendii townsendii*):

CDFW Species of Special Concern, Western Bat Working Group High Priority:

Both species are distributed from southern British Columbia and Montana to central Mexico, and east to Texas, Oklahoma, and Kansas. Pallid bats wedge themselves into tight cracks and crevices and big-eared bats hang from walls and ceilings in the open. Roosts are typically in rock crevices, tree hollows, mines, caves, and a variety of man-made structures, including vacant and occupied buildings. Tree roosting has been documented inside basal hollows of redwoods and, and within bole cavities in oak trees. They have also been reported roosting in stacks of burlap sacks and stone piles. Pallid bats are primarily insectivorous, feeding on large prey that is usually taken on the ground but sometimes in flight. Townsend's western big-eared bat typically forages near streams and wooded areas, where moths are the primary prey.

Guano and urine staining was observed in a storage room on the south side of the former Green Mill Restaurant and Inn. This structure and various sheds and other outbuildings on the site may provide suitable roost habitat for both bat species.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation Measures:

Mitigation Measure BIO-1:

1. Work within 300 feet of the on-site creek shall be restricted to periods of dry weather when water is not flowing. All exterior work shall be confined to 30 minutes after sunrise to 30 minutes before sunset.
2. Wildlife exclusion fencing shall be placed around the perimeter of the on-site tributary to prevent animals from entering the work area. Fencing shall be a minimum of 36 inches high,

with a minimum of 4 inches trenched into the ground. Fencing shall be installed under the guidance of a qualified biologist.

3. A pre-construction survey shall be performed within 48 hours prior to the start of activities by a qualified biological monitor. The biological monitor shall also oversee all ground-disturbing activities with the exception of demolition of existing buildings and/or removal of existing hardscape within the existing developed portion of the site. The biological monitor has authority to halt activities if presence of listed wildlife is observed. Non-listed species if found, may be relocated to suitable habitat outside the Project Site. If California Red-legged Frog is found, work shall be halted and the United States Fish and Wildlife Service (USFWS) contacted. Permit Sonoma shall be notified within one business day if USFWS is contacted. If possible, the frog should be allowed to leave the area on its own. If the frog does not leave on its own, all work shall remain halted until the USFWS issues a biological opinion or provides authorization for work to resume. Should a Biological Opinion be obtained in advance, measures outlined in the opinion must be followed.
4. Environmental awareness training shall be provided to all construction workers prior to the start of work. Training will include a description of all biological resources that may be found on or near the Project site, the laws and regulations that protect those resources, the consequences of non-compliance with those laws and regulations, instructions for inspecting equipment each morning prior to activities, and a contact person if protected biological resources are discovered on the Project site.
5. Tightly woven fiber netting or similar material shall be used for erosion control or other purposes to ensure amphibian and reptile species do not get trapped. Plastic monofilament netting (erosion control matting), rolled erosion control products, or similar material is prohibited.

Mitigation Measure BIO-2:

Prior to Phase 2, construction of the new septic system, or any ground disturbance beyond the existing hardscape and structures, the applicant shall consult with California Department of Fish and Wildlife to determine whether a CESA Section 2081 Incidental Take Permit should be obtained due to the potential for take of listed species from construction-related activities. Minimum avoidance and minimization measures prescribed in the 2007 Programmatic Biological (PBO) should also be implemented.

Mitigation Measure BIO-3:

The project site is within designated critical habitat for CTS, and is also within 1.3 miles of an adult CTS occurrence, mitigation for the loss of non- hardscape CTS upland habitat is prescribed at a 1:1 ratio or greater and may be obtained through purchase of CTS credits at a USFWS and CDFW-approved mitigation bank or through the purchase, enhancement, and protection of an off-site property subject to the requirements of the 2007 Programmatic Biological Opinion for establishing an off-site preserve. The applicant shall purchase credits prior to construction of the new septic system, any ground disturbance beyond the existing hardscape and structures, or implementation of Phase 2.

Mitigation Measure BIO-4:

Pallid bat and Townsend's big-eared bat may maternity roost in buildings present on the project site. To minimize impacts to this species, Construction-related activities within existing buildings shall be initiated between September 15 and April 15 to avoid impacts to pregnant females and active maternity roosts (colonial or solitary), if present. If activities must occur during the maternity season, a pre-construction roost assessment and emergence survey should be conducted in suitable habitat on or adjacent to the project site. If a maternity roost is located, that roost must remain undisturbed until September 15 or until a qualified biologist has determined the roost is no longer active.

Mitigation Measure BIO-5:

Prior to any grading or construction activities in the undisturbed portions of the site, a pre-construction survey shall be performed by a qualified biologist to map the location of any potential badger dens. If potential dens are observed, a minimum 300-foot no disturbance setback/buffer shall be established around the potential den during the breeding/pupping/rearing season (December 1 to May 31). During the non-breeding season (June 1 to November 31), a minimum 100-foot no disturbance setback/buffer shall be established.

If planned construction activities are to occur within the 100-foot non-breeding season setback, a qualified biologist will perform track plate and/or push camera surveys to determine occupancy in consultation with CDFW. If occupied, the biologist will install one-way doors to exclude badgers temporarily until work is completed. No work will occur within the setback until it is confirmed in consultation with CDFW that the den is no longer occupied.

A qualified biologist shall conduct a worker environmental awareness program to provide construction personnel with information on their responsibilities with regard to the American badger. The training shall describe the species and their habitat, the importance of the species and its habitat, measures that are being implemented to conserve the species, and actions to take in the event badgers are observed in the work area.

All fencing around the outer property shall maintain openings at the bottom large enough to allow free movement of badgers through the project area.

If an active badger den is observed during the pre-construction survey, then fencing around the outer perimeter of the property shall be modified and maintained to allow for badgers to move freely through the area. This may include pass-through fencing along portions of the parcel to allow badgers to disperse between properties or access natal dens if present. Such fence modifications shall be performed under the direction of the biologist. Impacts to a natal den and/or creation of a dispersal barrier would be considered significant under CEQA. Outer perimeter fencing modifications to allow passage will ensure no significant impacts to badger occur.

Mitigation Monitoring**Mitigation Monitoring BIO-1-5:**

Permit Sonoma staff will not issue grading, building, or septic permits until the site has been

surveyed by a qualified biologist to ensure proper fencing and buffers are in place prior to issuance.

Mitigation Monitoring BIO-3:

Permit Sonoma staff will not issue permits to construct a new septic system or any permits necessary to implement Phase 2 until the applicant provides a mitigation credit memo from U.S. Fish and Wildlife Service concurring with the proposed mitigation ratio and disturbed area, and a bill of sale for credits from an approved mitigation bank.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Comment:

The tributary to Lichau Creek may be classified as a waters and is potentially subject to U.S. Army Corps of Engineers jurisdiction, North Coast Regional Water Quality Control Board jurisdiction, and California Department of Fish and Wildlife jurisdiction. Potential impacts to the tributary would need to be mitigated in accordance with these agencies requirements, and is discussed in (c) below.

The project is not within a Riparian Corridor Combining Zone.

As discussed in (a) above, the project will involve potential disturbance to California Tiger Salamander habitat. See Mitigation BIO-3.

Significance Level:

Less than Significant Impact

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

Comment:

A tributary of Lichau Creek runs along the western edge of project site. The channel measures approximately 4-6 feet wide where it terminates at the northern parking lot and is culverted under the parking lot and Old Redwood Highway. There is a concrete headwall at the inlet for the channel just west of the parking lot. Vegetation associated with the channel includes non-native blackberry (*Rubus armeniacus*), Coast live oak (*Quercus agrifolia*), and willow (*Salix* sp.). During a March 2018 field visit, water was flowing in the creek at a depth of approximately 2 inches.

Two man-made drainage ditches were observed on the backside of the various buildings. These ditches appear to carry stormwater during rain events but were dry at the time of survey. One of these ditches is located between the existing restaurant building and southernmost parking lot and drains towards the water tank and then takes a sharp turn to the north. The ditch connects to a second ditch via a culvert and then drains into the tributary to Lichau Creek.

The tributary to Lichau Creek may be classified as "Waters of the United States", and is potentially under the jurisdiction of U.S. Army Corps of Engineers, North Coast Regional Water Quality Control Board, and California Department of Fish and Wildlife. Installation of pipes connecting the structures to the new septic system may create a minor disturbance to this tributary and would require permits in accordance with these agencies requirements.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measure BIO-6

Prior to the issuance of the septic permit, a wetland assessment of the disturbed area shall be provided to Permit Sonoma staff. The disturbed area shall include any required leachfield reserve area as well as the area disturbed by installation and operation of the septic system. In the event that disturbance of wetlands cannot be avoided, the applicant shall obtain necessary permits from state and federal regulatory agencies.

Mitigation Monitoring

Mitigation Monitoring BIO-6:

Permit Sonoma staff will not issue septic permits until the wetland assessment has been reviewed by Permit Sonoma and the applicant has obtained the necessary permits from state and federal regulatory agencies.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Comment:

See discussion in (a) above.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation:

See mitigation measures BIO-1-5

Mitigation Monitoring

See mitigation monitoring BIO-1-5

e) **Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?**

Comment:

The project does not propose to remove any native vegetation or trees. The Sonoma County Zoning Code does not recognize the tributary of Lichau Creek as a riparian corridor conservation area. Additional measures to protect biological resources are found in (a) above.

Significance Level:

Less than Significant Impact

f) **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan?**

Comment:

The Santa Rosa Plain Conservation Strategy was published on December 1, 2005. The Strategy provides the biological framework for conservation of the California tiger salamander (CTS) and four rare plant species found in conjunction with wetland habitat on the Santa Rosa Plain, which includes the project site. It identifies conservation areas and mitigation requirements for development projects that will impact the habitat of protected species, as illustrated within Enclosures 1&2 of the Programmatic Biological Opinion and Figure 3 of the SR Plains Conservation Strategy Plan.

The project is within the area that has Strategy Designation indicating a possible presence of CTS. The Strategy allows an applicant may assume the presence of CTS and use the mitigation requirements contained in the Programmatic Biological Opinion (PBO). In the case of this project, it is between 2,200 feet and 1.3 miles of a known CTS breeding site, which requires compensation for loss of CTS habitat at a minimum of 1:1 through purchase of CTS credits at a USFWS and CDFW-approved mitigation bank.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation:

See Mitigation Measure BIO-3

Mitigation Monitoring

See Mitigation Monitoring BIO-3

5. **CULTURAL RESOURCES:**

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Comments:

An evaluation of the site was conducted by Evans & De Shazo, Inc to evaluate potential impacts that may result from the proposed project. The study considered the Green Mill Restaurant and Inn building, water tower, single family building, and various outbuildings.

The study concluded that the Green Mill Restaurant and Inn does not retain enough integrity to convey significance for listing on the NRHP under any category and therefore the site can no longer convey significance as part of a district. Additionally, the house and outbuildings do not meet do not meet California Register of Historical Resources (CRHR) eligibility criteria.

Although the Green Mill Restaurant and Inn does not does not qualify for listing on the CRHR, the restaurant building and water tower however, the Green Mill Water Tower/Tank may still qualify as a local landmark. The existing building should be documented and artifacts recovered prior to demolition or restoration of the Green Mill Inn restaurant building.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measure CUL-1:

Prior to any demolition, the building floor plan and elevations shall be documented and preserved in electronic format and archival quality prints that can be utilized for future exhibits, documentation and research associated the property. The applicant shall work with local historical groups, such as the Penngrove Historical Society or Cotati Historical Society to recover and preserve physical artifacts prior to demolition or renovation of the Green Mill Restaurant and Inn building.

Mitigation Monitoring

Mitigation Monitoring CUL-1:

Building and demolition permits for the Green Mill Restaurant and Inn building shall not be issued until the existing structure has been documented and local historical groups given a reasonable opportunity to recover physical artifacts from the site that would be destroyed or damaged by implementation of the proposed project.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Comment:

On 5 June 2018 Permit Sonoma staff referred the project application to Native American Tribes

within Sonoma County to request consultation under AB-52 (the request for consultation period ended 5 July 2018). No request for consultation or additional information was received.

There are no known archaeological resources on the site, but the project could uncover such materials during construction. The following measure will reduce the impact to less than significant.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation

Mitigation Measure CUL-2

All building and/or grading permits shall have the following note printed on grading or earthwork plan sheets:

NOTE ON PLANS:

A Tribal or Archaeological Monitor is required to be present during all grading or other ground-disturbing work. The Tribal Monitor must be present on site before the start of any ground-disturbing work, including scraping. In the event that cultural resources are discovered at any time during grading, scraping or excavation within the property, all work should be halted in the vicinity of the find. Artifacts associated with prehistoric sites may include humanly modified stone, shell, bone or other cultural materials such as charcoal, ash and burned rock indicative of food procurement or processing activities. Prehistoric domestic resources include hearths, firepits, or house floor depressions whereas typical mortuary resources are represented by human skeletal remains. The Tribal Monitor, Archaeological Monitor, and Permit Sonoma - Project Review Staff shall be notified. Permit Sonoma Staff should consult with the appropriate tribal representative(s) from the tribes known to Permit Sonoma to have interests in the area to determine if the resources qualify as Tribal Cultural Resources (as defined in Public Resource Code § 21074). If determined to be a Tribal Cultural Resource, Permit Sonoma would further consult with the appropriate tribal representative(s) and project proponents in order to develop and coordinate proper protection/mitigation measures required for the discovery. Permit Sonoma may refer the mitigation/protection plan to designated tribal representatives for review and comment. No work shall commence until a protection/mitigation plan is reviewed and approved by Permit Sonoma - Project Review Staff. Mitigations may include avoidance, removal, preservation and/or recordation in accordance with California law. Evaluation and mitigation shall be at the applicant's sole expense.

"If human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and Permit Sonoma Staff and County Coroner must be notified immediately pursuant to State law so that an evaluation can be performed. If the remains are deemed to be Native American, the Native American Heritage Commission must be contacted by the Coroner so that a "Most Likely Descendant" can be designated and the appropriate provisions of the California Government Code and California Public Resources Code would be followed."

Mitigation Monitoring

Mitigation Monitoring CUL-1

Building/grading permits shall not be approved for issuance by Permit Sonoma - Project Review Staff until the above notes are printed on the building, grading and improvement plans.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?Comment:

A Cultural Resources Survey was prepared for the project by Garcia and Associates on 1 April 2018

Known prehistoric settlement patterns, specific environmental conditions, and geomorphology were considered to assess the potential for encountering buried archaeological sites in the project area. A comprehensive analysis of previously conducted archaeological investigations and recorded sites resulted in the identification of seven environmental factors associated with prehistoric settlement patterns: climate, ethnography, latitude, hydrography, lithic sources, topography, and vegetation class. Applying these seven factors to the archaeological record, they further observed that three specific environmental factors were identified as effectively classifying the majority of known site locations. These three factors are: 1) proximity to perennial freshwater, 2) proximity to freshwater confluences or shorelines, and 3) slope.

Based on the results of this site analysis, there is an overall low to moderate sensitivity rating for the presence of buried prehistoric archaeological sites within the Study Area where native soils are present. This result is attributed to the combined factors of a mid-to-late Holocene-aged landform, proximity to a perennial stream (Lichau Creek), landscape stability and slope, and proximity (.22 mile) to one previously recorded prehistoric archaeological site. The site survey did not result in the discovery of any prehistoric archaeological materials at the surface. While surface visibility was variable at the time of the survey, the lack of any prehistoric discoveries in exposed patches of native soils or rodent dirt piles is a strong indication that none will be found below the surface.

No unique geologic features exist on the project site or in the surrounding area.

It is highly unlikely that this project has potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

Significance Level:

No Impact

Less than Significant Impact

d) Disturb any human remains, including those interred outside of formal cemeteries?Comment:

No burial sites are known in the vicinity of the project, and most of the project site has already been

disturbed by past construction.

Mitigation measure described in 5b (above) will apply and all grading and building permits plans involving ground disturbing activities shall include the following notes:

"If paleontological resources or prehistoric, historic or tribal cultural resources are encountered during ground-disturbing work, all work in the immediate vicinity shall be halted and the operator must immediately notify the Permit and Resource Management Department (PRMD) – Project Review staff of the find. The operator shall be responsible for the cost to have a qualified paleontologist, archaeologist or tribal cultural resource specialist under contract to evaluate the find and make recommendations to protect the resource in a report to PRMD. Paleontological resources include fossils of animals, plants or other organisms. Prehistoric resources include humanly modified stone, shell, or bones, hearths, firepits, obsidian and chert flaked-stone tools (e.g., projectile points, knives, choppers), midden (culturally darkened soil containing heat-affected rock, artifacts, animal bone, or shellfish remains), stone milling equipment, such as mortars and pestles, and certain sites features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe. Historic resources include all by-products of human use greater than fifty (50) years of age including, backfilled privies, wells, and refuse pits; concrete, stone, or wood structural elements or foundations; and concentrations of metal, glass, and ceramic refuse.

If human remains are encountered, work in the immediate vicinity shall be halted and the operator shall notify PRMD and the Sonoma County Coroner immediately. At the same time, the operator shall be responsible for the cost to have a qualified archaeologist under contract to evaluate the discovery. If the human remains are determined to be of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of this identification so that a Most Likely Descendant can be designated and the appropriate measures implemented in compliance with the California Government Code and Public Resources Code."

Significance Level:

Less than Significant Impact

6. GEOLOGY AND SOILS:

Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Comment:

The project site is not within a fault hazard zone as defined by the Alquist-Priolo fault maps. Remodeling of existing structures will bring these buildings into conformance with the most recent

seismic standards under the California Building Code as modified by Sonoma County Code Chapter 7.

Significance Level:

Less than Significant Impact

ii. Strong seismic ground shaking?

Comment:

All of Sonoma County is subject to seismic shaking that would result from earthquakes along the San Andreas, Healdsburg-Rodgers Creek, and other faults. By applying geotechnical evaluation techniques and appropriate engineering practices, potential injury and damage from seismic activity can be diminished, thereby exposing fewer people and less property to the effects of a major damaging earthquake. The design and construction of new structures are subject to engineering standards of the California Building Code (CBC), which take into account soil properties, seismic shaking and foundation type. Project conditions of approval require that building permits be obtained for all construction and that the project meet all standard seismic and soil test/compaction requirements. The project would therefore not expose people to substantial risk of injury from seismic shaking. The following mitigation measures will ensure that potential impacts are reduced to less than significant levels.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation

Mitigation GEO-1

All earthwork, grading, trenching, backfilling and compaction operations shall be conducted in accordance with the County Subdivision Ordinance (Chapter 25, Sonoma County Code). All construction activities shall meet the California Building Code regulations for seismic safety. Construction plans shall be subject to review and approval of Permit Sonoma prior to the issuance of a building permit. All work shall be subject to inspection by Permit Sonoma and must conform to all applicable code requirements and approved improvement plans prior to the issuance of a certificate of occupancy.

Mitigation Monitoring GEO-1

Building/grading permits for ground disturbing activities shall not be approved for issuance by Project Review staff until the above notes are printed on applicable building, grading and improvement plans. The applicant shall be responsible for notifying construction contractors about code requirement.

Mitigation GEO-2

The design of all earthwork, cuts and fills, drainage, pavements, utilities, foundations and structural

components shall be prepared by a qualified engineer. The project engineer shall submit an approval letter for the engineered grading plans prior to issuance of the grading permit. Prior to final of the grading permit the project engineer shall also inspect the construction work and shall certify to Permit Sonoma, prior to the acceptance of the improvements or issuance of a certificate of occupancy that the improvements have been constructed in accordance with the geotechnical specifications.

Mitigation Monitoring GEO-2

Permit Sonoma Plan Check staff will ensure plans are in compliance with geotechnical requirements and Permit Sonoma inspectors will ensure construction is in compliance with geotechnical requirements.

iii. Seismic-related ground failure, including liquefaction?

Comment:

Strong ground shaking can result in liquefaction, the sudden loss of shear strength in saturated sandy material, resulting ground failure. The project site is on soils with very low susceptibility to liquefaction. All structures will be required to meet building permit requirements, including seismic safety standards and soil test/compaction requirements. Implementation of Mitigation Measures GEO-1, above would reduce any impacts to less than significant.

Significance Level:

Less than Significant Impact

iv. Landslides?

Comment:

The project site is relatively flat with no mapped landslide at the site or in the project vicinity.

Significance Level:

No Impact

b) Result in substantial soil erosion or the loss of topsoil?

Comment:

The project includes grading, cuts and fills which require the issuance of a grading permit. Improper grading, both during and post construction, has the potential to increase the volume of runoff from a site which could have adverse downstream flooding and further erosional impacts, and increase soil erosion on and off site which could adversely impact downstream water quality.

Erosion and sediment control provisions of the Drainage and Storm Water Management Ordinance (Chapter 11, Sonoma County Code) and Building Ordinance (Chapter 7, Sonoma County Code) requires implementation of flow control best management practices to reduce runoff. The

Ordinance requires treatment of runoff from the two year storm event. Required inspection by Permit Sonoma staff insures that all grading and erosion control measures are constructed according to the approved plans. These ordinance requirements and adopted best management practices are specifically designed to maintain potential water quantity impacts at a less than significant level during and post construction.

In regard to water quality impacts, County grading ordinance design requirements, adopted County grading standards and best management practices (such as silt fencing, straw wattles, construction entrances to control soil discharges, primary and secondary containment areas for petroleum products, paints, lime and other materials of concern, etc.), mandated limitations on work in wet weather, and standard grading inspection requirements, are specifically designed to maintain potential water quality impacts at a less than significant level during project construction.

For post construction water quality impacts, adopted grading permit standards and best management practices require that storm water to be detained, infiltrated, or retained for later use. Other adopted water quality best management practices include storm water treatment devices based on filtering, settling or removing pollutants. These construction standards are specifically designed to maintain potential water quality grading impacts at a less than significant level post construction.

The County adopted grading ordinances and standards and related conditions of approval which enforce them are specific, and also require compliance with all standards and regulations adopted by the State and Regional Water Quality Control Board, such as the Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, Low Impact Development and any other adopted best management practices. Therefore, no significant adverse soil erosion or related soil erosion water quality impacts are expected given the mandated conditions and standards that need to be met. See further discussion of related issues (such as maintenance of required post construction water quality facilities) refer to the Hydrology and Water Quality.

If project construction were to occur during wet weather however, it is possible that stormwater could carry soil offsite into local storm drains. This impact can be reduced to less than significant by using standard construction erosion control measures at the project site and including conditions of approval that prohibit grading when rain is in the forecast (ABAG, 1995).

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation

Mitigation Measure GEO-3

The applicant shall submit an Erosion and Sediment Control Plan prepared by a registered professional engineer as an integral part of the grading plan. The Erosion and Sediment Control Plan shall be subject to review and approval of the Permit Sonoma prior to the issuance of a grading permit. The Plan shall include temporary erosion control measures to be used during construction of cut and fill slopes, excavation for foundations, and other grading operations at the site to prevent discharge of sediment and contaminants into the drainage system. The Erosion and Sediment Control Plan shall include the following measures as applicable:

- a. Throughout the construction process, ground disturbance shall be minimized and existing vegetation shall be retained to the extent possible to reduce soil erosion. All construction and grading activities, including short-term needs (equipment staging areas, storage areas and field office locations) shall minimize the amount of land area disturbed. Whenever possible, existing disturbed areas shall be used for such purposes.
- b. All drainage ways, wetland areas and creek channels shall be protected from silt and sediment in storm runoff through the use of silt fences, diversion berms and check dams. Fill slopes shall be compacted to stabilize. All exposed surface areas shall be mulched and reseeded and all cut and fill slopes shall be protected with hay mulch and /or erosion control blankets as appropriate.
- c. All erosion control measures shall be installed according to the approved plans prior to the onset of the rainy season but no later than October 15th. Erosion control measures shall remain in place until the end of the rainy season, but may not be removed before April 15th. The applicant shall be responsible for notifying construction contractors about erosion control requirement.

Mitigation Monitoring

Mitigation Monitoring GEO-3

Building and grading permits for ground disturbing activities shall not be approved for issuance by Project Review staff until the above notes are printed on applicable building, grading and improvement plans.

- c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

Comment:

The project site is subject to seismic shaking and other geologic hazards as described in item 6.a.ii, iii, and iv, above. Refer back to appropriate mitigation measures.

Significance Level:

Less than Significant Impact

- d) **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

Comment:

The project site soil is Cotati Sandy Loam, which is non expansive.

Significance Level:

No Impact

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

Comment:

The project site is not in an area served by public sewer. Preliminary documentation provided by the applicant and reviewed by the Permit Sonoma Project Review Health Specialist indicates that the soils on site could support an adequate septic system and the required expansion area.

Significance Level:

No Impact

7. GREENHOUSE GAS EMISSIONS:

Would the project:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Comment:

In order to determine the significance of the impact the project was analyzed against BAAQMD screening criteria derived using default emission assumptions in URBEMIS and using off-model GHG estimates for indirect emissions from electrical generation, solid waste and water conveyance. The project is below the applicable screening criteria and so will not exceed the 1,100 MT of CO₂e/yr. threshold of significance for project other than permitted stationary sources.

A Climate Action 2020 Plan was developed by the Sonoma County Regional Climate Plan Authority (RCPA) in 2016 but was unable to be formally adopted due to litigation. The Sonoma County Board of Supervisors adopted a Climate Change Action Resolution on May 8, 2018 which acknowledged the Climate Action 2020 Plan and resolved to "...work towards the RCPA's countywide target to reduce GHG emissions by 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050" as well as adopting twenty goals for reducing GHG emissions including increasing carbon sequestration, increasing renewable energy use, and reducing emissions from the consumption of goods and services. The Bay Area Air Quality Management District (BAAQMD) has published greenhouse gas significance thresholds for use by local governments in the report titled *California Environmental Quality Act Air Quality Guidelines May 2017*. For projects other than stationary sources, the greenhouse gas significance threshold is 1,100 metric tons per year of CO₂e or 4.6 metric tons of CO₂e per service population (residents and employees) per year.

To assess potential greenhouse gas emissions related to the project, air quality modeling was performed using the CalEEMod Version 2016.3.2. The project is below the applicable screening criteria and so will not exceed the 1,100 MT of CO₂e per year threshold of significance for project other than permitted stationary sources.

Significance Level:

Less than Significant Impact

- b) **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Comment:

The County does not have an adopted Climate Action Plan but has established GHG reduction goals. The project, by implementing current county codes would be consistent with local or state plans, policies, or regulations adopted for the purpose of reducing emissions of greenhouse gases.

Significance Level:

Less than Significant Impact

8. HAZARDS AND HAZARDOUS MATERIALS:

Would the project:

- a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Comment:

Small amounts of potentially hazardous materials will be used on this project such as fuel, lubricants, and cleaning materials. Proper use of materials in accordance with local, state, and federal requirements, and as required in the construction documents, will minimize the potential for accidental releases or emissions from hazardous materials. This will assure that the risks of the project uses impacting the human or biological environment will be reduced to a less than significant level. There will be no increase in traffic as a result of this project, thus an increase in exposure due to the risks of transporting hazardous materials will not change as a result of the project.

Due to the age and previous use, the existing buildings may contain hazardous materials such as lead-based paint, pressure treated wood, and asbestos-containing materials. These materials will need to be removed and properly disposed of as part of Phase 2 of the proposed project.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measure HAZ-1

There is a presumption that any untested surface coatings in a pre-1978 structure are lead-based paints. (Title 17, California Code of Regulations, Division 1, Chapter 8, Accreditation, Certification and Work Practices for Lead-Based Paint and Lead Hazards and SB 460, the Cal/OSHA Lead in

Construction Standard), making it likely the existing restaurant building contains lead-based paint. Prior to any construction or demolition activities, materials in the existing restaurant building shall be tested by an individual holding an Inspector/Assessor (I/A) Certificate issued by California Department of Public Health. If lead is present, these materials will be treated as a hazardous material and handled in accordance with applicable regulations for the removal of lead paint. In general, these will include development of a debris containment and collection program, lead compliance plan, provisions to protect worker safety and health in compliance with Title 8 California Code of Regulations, including § 1532.1., and provisions for the proper handling and disposal of debris in accordance with all applicable Federal State and local hazardous waste laws. The contractor will be required to prepare and submit drawings to the County of the containment systems to be used.

Mitigation Measure HAZ-2

The project site shall be evaluated for presence of treated wood, and all treated wood waste shall be waste handled consistent with California Code of Regulations Title 22, Chapter 34, Sections 67386.1 through 67386.12 for labeling, accumulation, offsite shipment tracking, notification, treatment, and disposal. All personnel that may come into contact with treated wood waste will receive, at a minimum, training on safe handling, sorting and segregating, storage, labeling (including date), and proper disposal methods.

Mitigation Measure HAZ-3

The existing restaurant building shall be tested for asbestos-containing materials prior to any construction or demolition activities. If asbestos-containing materials are present, they shall be removed using one of several methods approved by the Federal EPA and California Occupational and Safety Hazard Administration (CalOSHA), at the contractor's discretion. Acceptable methods include wet scraping or the use of a dustless needle gun connected to a vacuum unit with a HEPA filter that empties directly into a waste container(s). The waste container(s) shall be properly documented and disposed of at a Class I landfill, such as the Clean Harbors Buttonwillow LLC facility in Buttonwillow, CA (CAD980675276) or the Chemical Waste Management Inc. Kettleman facility in Kettleman, CA (CAT000646117).

Mitigation Monitoring

Mitigation Monitoring HAZ-1

No permits shall be issued for Phase 2 for work involving existing structures until the applicant submits a lead hazard evaluation, and lead abatement plan (if necessary) to Permit Sonoma staff. If lead abatement is necessary, no work will be allowed within the buildings until lead abatement is complete.

Mitigation Monitoring HAZ-2

No permits shall be issued for Phase 2 for work involving existing structures until the applicant submits an evaluation of the presence of pressure treated wood to Permit Sonoma staff. Prior to occupancy of Phase 2, the applicant shall provide evidence of compliance with California Code of Regulations Title 22, Chapter 34, Sections 67386.1 through 67386.12 for labeling, accumulation,

offsite shipment tracking, notification, treatment, and disposal of pressure treated wood waste.

Mitigation Measure HAZ-2

No permits shall be issued for Phase 2 for work involving existing structures until the applicant submits an evaluation of the presence of asbestos-containing materials. If asbestos-containing materials are present, the applicant shall provide documentation of proper disposal at a Class I landfill prior to occupancy.

- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Comment:

During construction there could be spills of hazardous materials. See Item 8.a. above.

Significance Level:

Less than Significant Impact

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

Comment:

The proposed project is a school, but not within one-quarter mile of any other existing or proposed school. The project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste.

Significance Level:

No Impact

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Comment:

The project site was not identified on, or in the vicinity of, any parcels on lists compiled by the California Environmental Protection Agency, Regional Water Quality Control Board, California Department of Toxic Substances Control, and the CalRecycle Waste Management Board Solid Development Waste Information System (SWIS). The project area is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Significance Level:

No Impact

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Comment:

The site is not within the Airport Referral Area as designated by the Sonoma County Comprehensive Airport Land Use Plan.

Significance Level:

No Impact

- f) For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Comment:

There are no known private airstrips within the vicinity of the proposed project.

Significance Level:

No Impact

- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Comment:

The project would not impair implementation of, or physically interfere with the County's adopted emergency operations plan. There is no separate emergency evacuation plan for the County. In any case, the project would not change existing circulation patterns significantly, and would have no effect on emergency response routes.

Significance Level:

No Impact

- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas of where residences are intermixed with wildlands?

Comment:

According to the Wildland Fire Hazard Areas mapping (Figure PS-1g) of the Sonoma County General Plan 2020, the project is located in a moderate fire hazard zone. The proposed project is located in a flat area with limited vegetative cover. Construction on the project site must conform to Fire Safe Standards related to fire sprinklers, emergency vehicle access, and water supply making the impact

from risk of wildland fire less than significant.

Existing wildland fire conditions that could affect new development are considered in this analysis. Impacts of the environment on the proposed project are analyzed as a matter of County policy, not because such analysis is required by CEQA.

Significance Level:

Less than Significant Impact

9. HYDROLOGY AND WATER QUALITY:

Would the project:

a) Violate any water quality standards or waste discharge requirements?

Comment:

An unnamed tributary of Lichau Creek is approximately runs through the site, but no blue line streams are located on the property.

Permit Sonoma requires the project applicant to prepare a grading and drainage plan in conformance with Chapter 11 (Grading and Drainage Ordinance) and Chapter 11a (Storm Water Quality Ordinance) of the Sonoma County Code and the Sonoma County Storm Water Low Impact Development Guide, all of which include performance standards and Best Management Practices for pre-construction, construction, and post-construction to prevent and/or minimize the discharge of pollutants, including sediment, from the project site.

Application of standards associated with required grading permits will result in the proposed project having less than significant effect on water quality standards or waste discharge requirements. Under Sonoma County Code Chapter 11 (Grading and Drainage Ordinance), the project is required to implement Low Impact Development (LID), a site design strategy of Best Management Practices that mimics the pre-development site hydrology through features that promote storm water infiltration, interception, reuse, and evapotranspiration. LID techniques include use of small scale landscape-based BMPs such as vegetated natural filters and bioretention areas (e.g., vegetated swales and raingardens) to treat and filter storm water runoff. LID also requires preservation and protection of sensitive environmental features such as riparian buffers, wetlands, woodlands, steep slopes, native vegetation, valuable trees, flood plains, and permeable soils.

Significance Level:

Less than Significant Impact

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater

table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Comment:

The project is located in a Class 3 groundwater availability area. Application of the Soil Water Balance model (Groundwater Report APN 047-052-001, O'Conner Environmental - Michael Sherwood, Inc, 25 May 2018) to the project recharge area revealed that average water year groundwater recharge was approximately 7.3 inches year or 105.2 acre-feet per year for the project site recharge area. The total proposed water use is estimated to be 47.50 acre-feet per year, which represents 45% of the estimated mean annual recharge, indicating that the project is unlikely to result in declines in groundwater elevations or depletion of the groundwater resources over time.

Significance Level:

Less than Significant Impact

- c) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**

Comment:

There are no blue line streams on the site. There is an unnamed tributary of Lichau Creek crossing the project site from west to east.

Construction of the proposed project involves cuts, fills and other grading. Unregulated grading during construction has the potential to increase soil erosion from a site, which could cause downstream flooding and further erosion, which could adversely impact downstream water quality. Construction grading activities shall be in compliance with performance standards in the Sonoma County Grading and Drainage Ordinance. The ordinance and adopted construction site Best Management Practices (BMPs) require installation of adequate erosion prevention and sediment control management practices. These ordinance requirements and BMPs are specifically designed to maintain water quantity and ensure erosion and siltation impacts are less than significant level during and post construction.

Significance Level:

Less than Significant Impact

- d) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

Comment:

The project site is developed with one acre of existing parking, a 14,000 square foot restaurant building and several smaller accessory structures. The parking area and building footprints will not

be increased by the proposed project and there will be a minimal increase in impervious surface. The proposed project will be required grading permits for construction and adhere to standards of the Sonoma County Grading and Drainage Ordinance. Application of these standards will result in a less than significant impact to the existing site hydrology.

Significance Level:

Less than Significant Impact

- e) **Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?**

Comment:

The proposed project will result in less than one acre of ground disturbance and will not create any substantial additional sources of polluted runoff.

Significance Level:

Less than Significant Impact

- f) **Otherwise substantially degrade water quality?**

Comment:

Any future grading, cuts, and fills would require the issuance of a grading permit. Unregulated grading during construction has the potential to increase soil erosion which leads to water turbidity and degraded water quality. Prior to grading or building permit issuance, construction details for all water quality Best Management Practices shall be submitted for review and approval by the Grading & Storm Water Section of Permit Sonoma. The construction plans shall be in substantial conformance with the conceptual plans reviewed at the planning permit stage.

The County Grading and Drainage Ordinance and adopted Best Management Practices require installation of adequate erosion prevention and sediment control features. Inspection by County inspectors ensures that Best Management Practices are specifically designed to maintain potential water quality impacts of project construction at a less than significant level during and post construction.

Permit Sonoma would require that any construction be designed and conducted so as to prevent or minimize the discharge of pollutants or waste from the project site. Best Management Practices to be used to accomplish this goal include measures such as silt fencing, straw wattles, and soils discharge controls at construction site entrance(s). Storm water Best Management Practices may also include primary and secondary containment for petroleum products, paints, lime and other hazardous materials of concern.

Significance Level:

Less than Significant Impact

g) Place housing within a 100-year hazard area as mapped on a federal Flood hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Comment:

The County used FEMA Flood Insurance Rate Maps to map flood hazard areas in General Plan 2020 in order to guide the placement of housing outside of flood and other natural hazard areas. According to Figure PS-1e of the General Plan, the project is outside of the 100-year Flood Hazard Area. There is no potential for flooding at the site. No housing would be placed within a 100-year floodplain. (Source: FEMA Digital Flood Insurance Rate Map, Base flood Elevation Lines (100 yr flood data)

Significance Level:

No Impact

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Comment:

See the comments for Question 9(g) above. The site is outside the of the mapped 100-year flood hazard area. There is no 100-year flood hazard area on the site.

Significance Level:

No Impact

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Comment:

The project site is not located in an area that would be subject to flooding as a result of levee or dam failure.

Significance Level:

No Impact

j) Inundation by seiche, tsunami, or mudflow?

Comment:

The proposed project is not subject to seiche or tsunami. The project site is not located in an area subject to seiche or tsunami. Seiche is a wave in a lake triggered by an earthquake. Mudflow can be triggered by heavy rainfall, earthquakes or volcanic eruption.

Significance Level:

No Impact

10. LAND USE AND PLANNING:

Would the project:

a) Physically divide an established community?

Comment:

The project would not physically divide a community. It does not involve construction of a physical structure (such as a major transportation facility) or removal of a primary access route (such as a road or bridge) that would impair mobility within an established community or between a community and outlying areas.

Significance Level:

No Impact

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Comment:

Sonoma County General Plan 2020 policy LU-6e states:

"Public and private schools, hospitals, places of religious worship, and similar places of public or community assembly in rural land use categories shall meet all of the following criteria:

- (1) A use permit must be obtained prior to the initiation of the use.
- (2) The use shall be prohibited on agricultural lands designated Land Intensive Agriculture, with the exception of existing legally established uses.
- (3) The use shall not result in conflicts with agricultural production or related processing, support services, or visitor serving uses.
- (4) The use shall be consistent with Agricultural Resources Element Policy AR-4a.
- (5) Conflicts with other resource production activities are avoided.
- (6) Adequate public services and infrastructure must be available for the use, without inducing unplanned growth.
- (7) Sites are limited to 50% of the parcel or 10 acres, whichever is less, with the exception of existing legally established uses.
- (8) The site has frontage on a designated collector or arterial roadway, and
- (9) The size, scale and design of the use shall be in keeping with the rural character of the area in which it is located.

The project is consistent with Policy LU-6e in that it is not on agricultural lands, does not interfere

with any current or future agricultural use, is consistent with Agricultural Resources Element Policy AR-4a, has adequate public services and resources, will develop less than 3 acres of a 9.8 acre site, has frontage on a major arterial roadway (Old Redwood Highway), and will maintain the existing character of the site.

The project is in the Agriculture and Residential Zoning District, which allows schools, subject to a Use Permit (Section 26-16-020 (k)).

The project would not conflict with any applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect, including in the Sonoma County General Plan and zoning ordinance.

Significance Level:

No Impact

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

Comment:

See 4.f. above. The project site is within the Santa Rosa Plain Conservation Strategy area.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation:

See Mitigation Measure BIO-3

Mitigation Monitoring

See Mitigation Monitoring BIO-3

11. MINERAL RESOURCES:

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Comment:

The project site is not located within a known mineral resource deposit area (Sonoma County Aggregate Resources Management Plan, as amended 2010).

Significance Level:

No Impact

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

Comment:

The project site is not located within an area of locally-important mineral resource recovery site and the site is not zoned MR (Mineral Resources) (Sonoma County Aggregate Resources Management Plan, as amended 2010 and Sonoma County Zoning Code). No locally-important mineral resources are known to occur at the site.

Significance Level:

No Impact

12. NOISE:

Would the project:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Comment:

For the practice/demonstration sessions that take place indoors, a large activity room located in southwestern corner of the main building will be used during both Phases 1 and 2. This room will also be ventilated so that doors and windows can be closed when in use. Exterior noise from indoor activities will meet the Sonoma County General Plan Table NE-2 standards for noise thresholds.

Outdoor practice/demonstration sessions will involve one dog at a time and typically not generate noise greater than normal speech, although something could disturb the dog and incite barking. Given distance to property lines and natural attenuation by existing buildings, noise would not exceed Sonoma County General Plan Table NE-2 standards.

Phase 2 will include an indoor kennel for up to 10 dogs. This building will be mechanically ventilated so that windows and doors can remain closed and the building walls will be constructed to provide the maximum amount of attenuation possible with conventional construction methods. This will result in a 20 dBA reduction in transmitted noise, meeting Sonoma County General Plan Table NE-2 standards.

Condition of Approval will impose the following standards on construction activities. Application of these standards reduces construction related noise to a less than significant level.

Construction Conditions:

Construction activities for this project shall be restricted as follows:

All plans and specifications or construction plans shall include the following notes:

- a) All internal combustion engines used during construction of this project will be operated with mufflers that meet the requirements of the State Resources Code, and, where applicable, the Vehicle Code. Equipment shall be properly maintained and turned off when not in use.
- b) Except for actions taken to prevent an emergency, or to deal with an existing emergency, all construction activities shall be restricted to the hours of 7:00 a.m. and 7:00 p.m. on weekdays and 9:00 a.m. and 7:00 p.m. on weekends and holidays. If work outside the times specified above becomes necessary, the applicant shall notify the PRMD Project Review Division as soon as practical.
- c) There will be no startup of machinery or equipment prior to 7:00 a.m., Monday through Friday or 9:00 am on weekends and holidays; no delivery of materials or equipment prior to 7:00 a.m. nor past 7:00 p.m., Monday through Friday or prior to 9:00 a.m. nor past 7:00 p.m. on weekends and holidays and no servicing of equipment past 7:00 p.m., Monday through Friday, or weekends and holidays. A sign(s) shall be posted on the site regarding the allowable hours of construction, and including the developer- and contractors mobile phone number for public contact 24 hours a day or during the hours outside of the restricted hours.
- d) Pile driving activities are prohibited.
- e) Construction maintenance, storage and staging areas for construction equipment shall avoid proximity to residential areas to the maximum extent practicable. Stationary construction equipment, such as compressors, mixers, etc., shall be placed away from residential areas and/or provided with acoustical shielding. Quiet construction equipment shall be used when possible.
- f) The developer shall designate a Project Manager with authority to implement the mitigation prior to issuance of a building/grading permit. The Project Managers 24-hour mobile phone number shall be conspicuously posted at the construction site. The Project Manager shall determine the cause of noise complaints (e.g. starting too early, faulty muffler, etc.) and shall take prompt action to correct the problem.

Significance Level:

Less than Significant with Mitigation Incorporated

- b) **Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?**

Comment:

The project includes construction activities that may generate minor ground borne vibration and noise. These levels would not be significant because they would be short-term and temporary, and

would be limited to daytime hours. There are no other activities or uses associated with the project that would expose persons to or generate excessive ground borne vibration or ground borne noise levels.

Significance Level:

Less than Significant Impact

- c) **A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

Comment:

The project would not result in a significant permanent increase in ambient noise levels.

Significance Level:

Less than Significant Impact

- d) **A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

Comment:

See discussion of construction related noise in Item 12(a) above.

Significance Level:

Less than Significant Impact

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

Comment:

The site is not within an airport land use plan as designated by Sonoma County.

Significance Level:

No Impact

- f) **For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

Comment:

There are no known private airstrips within the project area and people residing or working in the

project area would not be exposed to excessive noise.

Significance Level:

No Impact

13. POPULATION AND HOUSING:

Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Comment:

The project would not include construction of a substantial amount of homes, businesses or infrastructure and therefore would not induce substantial population growth.

Significance Level:

Less than Significant Impact

- b) Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

Comment:

The project will convert a single family home to non-residential use. This will not result in a substantial reduction of housing and will not construction of replacement housing.

Significance Level:

Less than Significant Impact

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Comment:

See Item 13(b) above.

Significance Level:

Less than Significant Impact

14. PUBLIC SERVICES:

Would the project:

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

Comment:

Construction of the project would not involve substantial adverse physical impacts associated with provision of public facilities or services and the impact would be less than significant.

Significance Level:

Less than Significant Impact

i. Fire protection?

Comment:

The Rancho Adobe Fire Protection District will continue to serve this area. There will be no increased need for fire protection resulting from implementation of the proposed project.

Sonoma County Code requires that all new development meet Fire Safe Standards (Chapter 13). The County Fire Marshal reviewed the project description and requires that the expansion comply with Fire Safe Standards, including fire protection methods such as sprinklers in buildings, alarm systems, extinguishers, vegetation management, hazardous materials management and management of flammable or combustible liquids and gases. This is a standard condition of approval and required by county code and impacts would be less than significant.

Significance Level:

Less than Significant Impact

ii. Police?

Comment:

The Sonoma County Sheriff will continue to serve this area. There will be no increased need for police protection resulting from implementation of the proposed project.

Significance Level:

Less than Significant Impact

iii. Schools, parks, or other public facilities?

Comment:

Development fees to offset potential impacts to public services, including school impact mitigation fees, are required by Sonoma County code and state law for new subdivisions and residential developments. While the project itself is a new school, it will not generate a demand for additional schools in the project vicinity.

Significance Level:

Less than Significant Impact

iv. Parks?Comment:

Sonoma County Code, Chapter 23 requires payment of parkland mitigation fees for all new residential development for acquisition and development of added parklands to meeting General Plan Objective OSRC-17.1 to "provide for adequate parkland and trails primarily in locations that are convenient to urban areas to meet the outdoor recreation needs of the population..." Development fees collected by Sonoma County are used to offset potential impacts to public services, including park mitigation fees. The project will not result in the need for any new park facilities, and demand for parks in general is addressed through fees.

Significance Level:

No Impact

v. Other public facilities?Comment:

There are no other public facilities in the project vicinity that would be affected by the proposed project.

Significance Level:

No Impact

15. RECREATION:**Would the project:**

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

Comment:

The proposed project would not involve activities that would cause or accelerate substantial physical deterioration of parks or recreational facilities. The project will have no impact on the use of existing neighborhood and regional parks or other recreational facilities.

Significance Level:

No Impact

- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Comment:

The proposed project does not involve construction of recreational facilities. See item 15.a. above.

Significance Level:

No Impact

16. TRANSPORTATION / TRAFFIC:

Would the project:

- a) **Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

Comment:

The project is located on Old Redwood Highway, which is a County major route running generally parallel to Highway 101. It connects County communities to the cities along the Highway 101 corridor. Old Redwood Highway in project vicinity has two paved 12-foot travel lanes and Class II bicycle lanes. The posted speed limit on Old Redwood Highway near the project is 50 miles per hour. Daily weekday and weekend two-way traffic counts were conducted along Old Redwood Highway adjacent to project access driveways on Thursday, March 29, 2018 and Saturday, March 31, 2018 (Focused Traffic Study for Bergin University of Canine Studies Project, Transpedia Consulting Engineers 14 May 2018).

Old Redwood Highway carries approximately 11,479 vehicles per weekday, with a peak of 1,071 vehicles per hour (vph) during weekday am peak hour (7:15 am-8:15 am) and 1,065 vph during pm peak hour (5:00 pm-6:00 pm). However, it carries approximately 9,692 vehicles per peak weekend day (Saturday), with a peak of 834 vph during the weekend peak hour (2:30 pm-3:30 pm).

TRIP GENERATION

Former restaurant use generated an average of 1,015 daily trips with 86 trips during the am peak hour and 79 trips during the PM peak hour.

Phase 1 of the proposed project will generate the following trips:

Teaching programs: 246 daily trips with 23 trips during am and pm peak hours.

Summer program: 141 daily trips with 12 trips during am and pm peak hour.

Phase 1 of the proposed project will generate the following trips:

Teaching programs: 590 daily trips with 53 trips during am and pm peak hours.

Summer program: 417 daily trips with 36 trips during am and pm peak hour.

SIGHT DISTANCE

Sight distance at Old Redwood Highway and project's driveway intersection was evaluated based on Caltrans sight distance (*Caltrans Highway Design Manual, December 30, 2015*).

The Manual requires a minimum corner sight distance of 550 feet for a 50-mph design speed. The corner sight distance at the project driveway intersection is approximately 700 feet from the south and approximately 1,800 feet when looking to the north. The project does not propose any landscaping along the project frontage, or locating any structures closer than the existing restaurant building. As proposed, the project will meet Caltrans standards for sight line distance.

Significance Level:

Less than Significant Impact

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Comment:

Sonoma County does not have a congestion management program but LOS standards are established by the Sonoma County General Plan Circulation and Transit Element. See Item 16(a) above for a discussion of traffic resulting from the proposed project.

Trip generation from the proposed project will have a less than significant impact on Old Redwood Highway and surrounding local roads.

Significance Level:

Less than Significant Impact

- c) Result in change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

Comment:

The project would have a less than significant effect on air traffic patterns.

Significance Level:

Less than Significant Impact

- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

Comment:

The project would not increase hazards, since it maintains the existing alignment of the roadway.

Significance Level:

No Impact

- e) Result in inadequate emergency access?**

Comment:

Development on the site must comply with all emergency access requirements of the Sonoma County Fire Safety Code (Sonoma County Code Chapter 13), including emergency vehicle access requirements. Project development plans are required to be reviewed by a Department of Fire and Emergency services Fire Inspector during the building permit process to ensure compliance with emergency access issues. Refer to discussion in item 16(d), above.

Significance Level:

Less than Significant Impact

- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

Comment:

The project would not create conflicts with County bicycle standards or plans for use alternative transportation, including bus turnouts.

Significance Level:

No Impact

- g) Result in inadequate parking capacity?**

Comment:

Sonoma County Zoning Code Section 26-86-010 requirement for colleges, universities and institutions of higher learning, business and professional schools and colleges, and music and

dancing schools is 1 space per employee, 1 space per 3 students and 1 secure bicycle parking space per 5 spaces of required automobile parking.

Phase 1 (18 employees and 50 students) will provide 35 parking spaces and secure parking for 7 bicycles. Phase 2 (46 employees and 104 students) will remove temporary structures from the parking area, providing 82 parking spaces and secure parking for 17 bicycles at full project implementation. Parking is consistent with Section 26-86-010 requirements.

Significance Level:

No Impact

17. UTILITIES AND SERVICE SYSTEMS:

Would the project:

- a) **Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

Comment:

Domestic wastewater disposal would be by on-site wastewater system (septic system), and therefore, would have no impact upon a wastewater treatment system, or require action by the Regional Water Quality Control Board.

Significance Level:

Less than Significant Impact

- b) **Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

Comment:

The project would not contribute to the need for construction of new water or wastewater treatment facilities, other than construction of new septic systems.

Significance Level:

Less than Significant Impact

- c) **Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

Comment:

Grading of the site for roads, septic systems and residential development may alter the natural topography and may alter the drainage pattern and increase storm water runoff. Development would only be permitted after Permit Sonoma reviews storm water drainage development plans

designed by a storm water engineer to ensure adequate management of storm-water drainage facilities on the site.

Significance Level:

Less than Significant Impact

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

Comment:

The project is located in a Class 3 groundwater availability area. Application of the Soil Water Balance model (Groundwater Report APN 047-052-001, O'Conner Environmental - Michael Sherwood, Inc, 25 May 2018) to the project recharge area revealed that average water year groundwater recharge was approximately 7.3 inches year or 105.2 acre-feet per year for the project site recharge area. The total proposed water use is estimated to be 47.50 acre-feet per year, which represents 45% of the estimated mean annual recharge, indicating that the project is unlikely to result in declines in groundwater elevations or depletion of the groundwater resources over time.

Significance Level:

Less than Significant Impact

- e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Comment:

A new septic system would be constructed for any residential development. There would be no sewage treatment by an off-site provider.

Significance Level:

No Impact

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

Comment:

Sonoma County has a solid waste management program in place that provides solid waste collection and disposal services for the entire County. The program can accommodate the permitted collection and disposal of the waste that would result from the proposed project.

Significance Level:

Less than Significant Impact

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Comment:

Sonoma County has access to adequate permitted landfill capacity to serve the proposed project.

Significance Level:

Less than Significant Impact

18. MANDATORY FINDINGS OF SIGNIFICANCE

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than Significant Impact

- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact

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