



# Mitigated Negative Declaration

Sonoma County Permit and Resource Management Department  
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Public Review Period: 30 Days  
State Clearinghouse Number:  
Permit Sonoma File Number: MNS16-0002  
Prepared by: Derik Michaelson  
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## PROJECT DATA

Pursuant to Section 15071 of the State CEQA Guidelines, this proposed Mitigated Negative Declaration and the attached Initial Study with identified mitigation measures and monitoring constitute the environmental review conducted by the County of Sonoma as the lead agency for the proposed project

**Project Name:** Craig Avenue Minor Subdivision  
**Owner/Applicant:** 1100 Craig Avenue, LLC / Jerry Igra, Managing Partner  
**Consultant:** Adobe Associates, Civil Engineering  
**Project Location:** 1100 Craig Avenue, Sonoma County (west of Arnold Drive)  
**Assessor Parcel Number:** 052-251-034 and 052-251-031  
**General Plan Land Use:** RR 5 (Rural Residential), 5 acres per unit density  
**Zoning Designation:** RR B6 5 (Rural Residential), RC50/25 (Riparian Corridor, 50 foot setback) X (Vacation Rental Exclusion Zone)  
**Decision Body:** Project Review Advisory Committee  
**Appeal Body:** Planning Commission

**Project Description:** Tentative map proposal for subdividing a 16.28 acre rural infill property with riparian (Dowdell Creek) sensitivity into three separate parcels for single-family development.

## ENVIRONMENTAL FACTORS

This project potentially affects the following environmental factors as discussed within the attached Initial Study. Those checked under "Yes" involve at least one impact identified as either "Potentially Significant" or "Less than Significant with Mitigation". Those checked under "No" involve either "No Impact" or has been determined "Less than Significant".

**Table 1. Summary of Environmental Factors**

Environmental Factors	Abbreviation	Yes	No
1. Aesthetics	VIS		X
2. Agricultural & Forest Resources	AG		X
3. Air Quality	AIR		X
4. Biological Resources	BIO	X	
5. Cultural Resources	CUL	X	
6. Geology and Soils	GEO		X
7. Greenhouse Gas Emission	GHG		X
8. Hazards and Hazardous Materials	HAZ		X

Environmental Factors (Continued)	Abbreviation	Yes	No
9. Hydrology and Water Quality	HYD	x	
10. Land Use and Planning	LUP		X
11. Mineral Resources	MIN		X
12. Noise	NOI	X	
13. Population and Housing	POP		X
14. Public Services	PUB		X
15. Recreation	REC		X
16. Transportation and Traffic	TRA		X
17. Utility and Service Systems	UTL		X
18. Mandatory Findings of Significance		X	

### RESPONSIBLE AND TRUSTEE AGENCIES

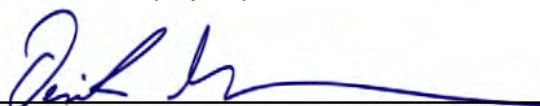
The following table lists the other public agencies whose approval may be required to construct and/or operate the project, or who have jurisdiction over resources potentially affected by the project.

**Table 2. Responsible Agencies / Other Permits Required**

Agency	Activity	Authorization
U. S. Army Corps of Engineers	Dredge or fill potential on US waters / wetlands	Clean Water Act, Section 401
Regional Water Quality Control Board (San Francisco Bay)	Discharge potential into State waters / wetlands	California Clean Water Act (Porter Cologen)
Regional Water Quality Control Board (San Francisco)	Dredge or fill potential on State waters / wetlands	Clean Water Act, Section 404
State Water Resources Control Board	Generating stormwater	National Pollutant Discharge Elimination System (NPDES)
California Department of Fish and Wildlife	Lake or streambed alteration agreement	Fish and Game Code, Section 1600
Bay Area Air Quality Management District (BAAQMD)	Stationary air emissions	
Northern Sonoma County Air Pollution Control District (NSCAPCD)	Stationary air emissions	
Valley of the Moon Water District	Public water connection	

### 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.

  
 Prepared by:  
 Derik Michaelson, Project Planner

February 26, 2021  
 Date



February 26, 2021

## I. INTRODUCTION

On March 27, 2018, the Sonoma County Permit and Resource Management (Permit Sonoma) Department, Project Review division published the original version of this Initial Study for public review. The project was referred to at that time as the "Larbre Minor Subdivision". Presently, Jerry Igra, Managing Partner, on behalf of 1100 Craig Avenue, LLC, proposes to revive the project and proceed with securing tentative map approval as the new owner. The project scope as previously proposed remains the same, a minor subdivision of 16.21 acres into three separate parcels for single-family development. This recirculation of the Initial Study includes further analysis based on two additional technical reports, a groundwater study and a rare species plant survey. The reports are addressed under the Biology and Hydrology sections of this study.

This report is the Initial Study required by the California Environmental Quality Act (CEQA). The report was prepared by Derik Michaelson, Project Review Planner with the Sonoma County Permit and Resource Management Department, Project Review Division. Information on the project was provided by the property owner, and on behalf of the property owner by Adobe Associates. This initial study provides analysis and conclusions based on technical studies submitted as part of the project. The referenced studies are available for review and listed with appropriate website and file download locations under Section VI (Document Sources) below. A referral letter addressed to appropriate local, state and federal agencies and interest groups with potential interest in commenting on the project was sent prior to the original circulation of this environmental document. Copies of the agency referral comments are also available for review as noted within the Document Sources section. For general inquiries regarding this project, please contact the Project Planner at [derik.michaelson@sonoma-county.org](mailto:derik.michaelson@sonoma-county.org).

## II. PROJECT DESCRIPTION

The project applicant requests approval of a minor subdivision tentative map to create three legal parcels for single-family development on 16.28 acres. The project site is an undeveloped rural infill parcel with Dowdell Creek running northeast by southwest through its center and developed single-family properties making up its immediate surroundings. County regulations designate the property Rural Residential (RR) with allowable development potential established per the following requirements:

Maximum density:	1 dwelling unit per 5 acres (16.28 / 5 = 3 dwelling units);
Minimum lot standards:	1.5 acre parcel size / 80 foot lot width;
Riparian corridor:	50 foot setback requirement from outer creek banks;
Building setbacks:	20 feet from access frontage and rear lot lines, 5 feet from side lot lines;
Minimum septic size:	3 bedroom capacity with 200% reserve area.

### Tentative Map

The proposed tentative map identifies three separate lot configurations conforming to current County regulations for Rural Residential (RR) development. Development potential resulting from the project will support future construction of three single-family homes and related site improvements on individual parcels of 4.96 acres, 4.60 acres, and 6.72 acres in size. Lots 1 and 2 are located on the northerly side of Dowdell Creek fronting Craig Avenue. Lot 3 is proposed on the opposite southerly side of the creek with access from Elm Avenue. The specific lot sizes and access streets are as follows:

Lot 1:	4.96 acres	Craig Avenue
Lot 2:	4.60 acres	Craig Avenue
Lot 3:	6.72 acres	Elm Avenue



*Project Location*

### Site Development

Exact building locations will be confirmed in accordance with zoning setback requirements at the time of permitting for each lot. Anticipated site improvements for each home will involve construction of individual driveway configurations, drainage and storm water features, private sewage disposal systems, and possible well or public water connection improvements. Lot-specific improvements will involve construction of a small footbridge and septic line crossing over time Dowdell Creek for Parcel 3. The applicant will confirm the design and location of the footbridge during the permitting phase for development of Lot 3. Additionally, the tentative map identifies the following site features as part of the proposed subdivision design:

- Preliminary septic system and building envelope locations for each proposed lot;
- 30 foot wide access parcel and driveway alignment on Elm Avenue serving Lot 3.
- 20 foot wide access easement along Lot 2 easterly boundary serving Lot 3 septic system;
- 50 foot riparian corridor setback limit from outer boundary of Dowdell Creek bank.

### Site Access

The tentative map locates Lots 1 and 2 on the northerly side of Dowdell Creek fronting Craig Avenue. Exact locations of individual driveway alignments on Craig Avenue will be confirmed at the time of permitting. Lot 3 is located on the opposite side of the creek with access provided from Elm Avenue by way of a separate 30 foot wide access parcel. The access parcel enters Lot 3 near the southeast corner of site and extends approximately 160 feet to align with Elm Avenue. The preliminary alignment concept and initial driveway configuration for Lot 3 is identified on the tentative map.

The tentative map identifies an access easement serving the septic system location for Lot 3 from Craig Avenue. The tentative map identifies the septic location on the northerly side of Dowdell Creek adjacent to Lot 2. The proposed easement extends across the eastern lot line of Lot 2 to access the septic location. The applicant also proposes a small footbridge over Dowdell Creek for direct access from Lot 3 to its proposed septic location. The specific design and location of the footbridge will be confirmed at the time of permitting for the parcel

### Sewage Disposal

All three proposed parcels have been tested for private sewage disposal systems. The tentative map identifies the proposed septic locations and required reserve area for each parcel. A portion of Lot 3 is located on the opposite northerly side of the creek adjacent to Lot 2. The northeasterly segment supports the proposed mound septic system for the property. The Lot 3 septic design proposes a 4-inch connection line that will be suspended beneath a small footbridge crossing over Dowdell Creek. The footbridge design and specific location will be determined at the time of permitting for Parcel 3.

### Water Service

The property is within the service boundaries of the Valley of the Moon Water District (Water District), and is in a Class 1 water availability area and the designated priority groundwater basin of Sonoma Valley. The applicant intends to secure public connections from the District for each lot, and/or drill private wells per the allowances and conditions provided in the hydrological report. The Water District confirms sufficient water availability to serve the three parcels subject to meeting service connection fees and requirements. These requirements may include, but are not limited to, the following:

- Fire flow review including letter from system designer
- Irrigation demand review
- Indoor water demand review
- Utility easements etc.

### Drainage and Storm Water

Natural runoff patterns currently sheet flow from the western portion of the site to the east, ultimately into the existing Dowdell Creek that runs west to east across the three proposed lots. The applicant has submitted preliminary stormwater management plan identifying Low Impact Development (LID) criteria for required storm water mitigation. Best management practices require that each parcel direct runoff from impervious surfaces areas to permanent bioretention facilities sized at 4% of the tributary areas. Permit Sonoma will review a final stormwater control plan during permitting to ensure proper design and implementation of required bioretention facilities for each of the three proposed lots.

### Emergency Services

The Sonoma Valley Fire Protection District serves the project site with its nearest station located one mile away to the south east at 877 Center Street. Proposed residences will be sprinklered and fire sensitive vegetation managed appropriately around all habitable structures per current fire safe standards and permitting requirements. Existing public streets are available to provide required access to prospective building sites for each lot. A 30 foot wide private access parcel currently serves the proposed location of Lot 3. The access parcel will accommodate proposed development of a 12 foot wide private driveway per current fire safe standards, including one foot shoulders with an inside pavement radius of 50 foot, and 25 foot radius returns at the Elm Avenue pavement edge. The project vicinity is located within a moderate wildfire risk area. The moderate designation is due to increase in higher risk areas associated with Sonoma Mountain foothills approximately 0.7 miles to the west.

## **III. BACKGROUND DATA**

### Existing Conditions

The project site is located in southwestern Sonoma Valley west of Arnold Drive and is bound by Craig Avenue to the north, Elm Avenue to the south, and single-family residences to the west. Access to the property is presently from a 30 foot wide parcel located on Elm Avenue. The site is relatively level with slopes ranging between 1% and 5% falling west to east. The site covers approximately 16 acres and is bisected by Dowdell Creek, which is shown as a blue-line creek on the Sonoma 7.5 minute U.S.G.S. quadrangle. Dowdell Creek measures approximately 1,050 linear feet on the property entering the direction off the site at the southeastern corner. The majority of the site may be characterized as nonnative grassland with several large heritage oak trees (*Quercus lobata*) on the site. A few large oaks and willow grow along the creek banks although the canopy is mostly non-native grasses, blackberry and poison oak. Historically the site was used for hay production and grazing. There is a slight hill on the southwestern portion of the site on Parcel 3.

### General Plan and Zoning

The Sonoma County General Plan map designates the project site as Rural Residential (RR 5) with a density requirement of five acres per dwelling unit. The corresponding zoning district is RR B6 5, with a combining district designation for Riparian Corridor (RC50/25). The RC designation establishes a 50 foot setback requirement from the top of creek bank along both sides of Dowdell Creek. Minimum development requirements under the corresponding zoning designation for Rural Residential include a lot size of 1.5 acres, a lot width of 80 feet, and a lot depth of 150 feet. Property line setback requirements for new buildings include a 20 foot front setback and a 5 foot side setback, with the rear setback standard (20 feet) superseded in this case by the 50 foot riparian setback requirement.

### Surrounding Uses

Existing single-family development borders the project site to the west, north, east, and south. The surrounding neighborhood includes a total of 17 residential properties fronting Craig Avenue to the north, Elm Drive to the south, and Orange Avenue to the west. The residential lots range primarily between 0.25 to 2.0 acres in size, each containing an existing single-family home. Two larger parcels border the easterly boundary of the project site. The two parcels front Arnold Drive and are each over seven acres in size. One of the parcels is a former golf driving range and currently being developed as a single family residence. The other is currently developed with two existing residences and three small commercial buildings. An existing well and pump business occupies two of the commercial structures. An existing restaurant/café building occupies the other.

## **IV. ISSUES RAISED BY THE PUBLIC OR AGENCIES-**

On March 27, 2018, the Sonoma County Permit and Resource Management (Permit Sonoma) Department, Project Review division submitted the original publication of this Initial Study and Mitigated Negative Declaration (IS/MND) to the State Clearing House for public review and circulation. Issues concerning the IS/MND were raised by public comments submitted by a neighboring property owner of the project. No public agency comments were received during the 30-day review period.

The public comment letter is listed in the referenced Source Documents (Section VI) below. This recirculated version of the IS/MND identifies and responds to issues raised by those comments where appropriate under the applicable discussion sections. These sections include: Aesthetics, Biology, Geology and Soils, and Hydrology and Water Quality

## **V. INITIAL STUDY CHECKLIST**

This checklist is taken from Appendix G of the State CEQA 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 to create or add increment to the impact described.
- **Less than Significant:** 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 on the checklist was answered by evaluating the project as proposed, that is, without considering the effect of any added mitigation measures. The checklist includes a discussion of the impacts and mitigation measures that have been identified

## VI. SOURCE DOCUMENTS

The following documents were referenced or developed in preparation of the Initial Study checklist, and are hereby incorporated as part of this publication. Items 1 through 4 may be downloaded from the link location referenced below. All other documents are available by reference at the Permit and Resource Management Department via PermitSonoma.org, or as listed on the website of the Individual public agency referenced below.

**Available for download at:** [https://share.sonoma-county.org/link/drpy\\_7NAad8/](https://share.sonoma-county.org/link/drpy_7NAad8/)

1. Project Application: Proposal Statement and Tentative Map
2. Project Technical Reports:
  - a. Groundwater Report, O'Connor Environmental, Inc., July 9, 2020
  - b. Protocol-level special-status plant survey letter, SOL Ecology, July 27, 2020.
  - c. Biological Constraints Analysis, Lucy Macmillan Environmental Scientist, October 5, 2017
  - d. Cultural Resources Evaluation, Archaeological Resource Services, September 11, 2017.
  - e. Stormwater Control Plan for regulated project, Adobe Associates, Inc, August 28, 2018
3. Agency Referral Comments
4. Public Comments

**Available by reference on Permit Sonoma website:** <https://sonomacounty.ca.gov/Permit-Sonoma/>

5. Sonoma County General Plan and EIR
6. Sonoma County Zoning Ordinance
7. Tree Protection and Replacement Ordinance (Ordinance No. 4014); Sonoma County.
8. Heritage or Landmark Tree Ordinance (Ordinance No. 3651); Sonoma County.
9. Sonoma County Aggregate Resources Management Plan and Program EIR, 1994
10. Streamside Conservation Plan and Zoning Permit submittal guide and attachments

**Available by reference on Public Agency website**

11. Alquist-Priolo Special Studies Zones; State of California; 1983.  
[www.conservation.ca.gov/cgs/alquist-priolo](http://www.conservation.ca.gov/cgs/alquist-priolo)
12. BAAQMD CEQA Guidelines; Bay Area Air Quality Management District  
[www.arb.ca.gov/](http://www.arb.ca.gov/)
13. California Environmental Quality Act (CEQA)  
[www.califaep.org/docs/2020\\_ceqa\\_book.pdf](http://www.califaep.org/docs/2020_ceqa_book.pdf)
14. California Environmental Protection Agency  
[www.calepa.ca.gov/SiteCleanup/corteseList/default.htm](http://www.calepa.ca.gov/SiteCleanup/corteseList/default.htm);
15. California Regional Water Quality Control Board  
[geotracker.swrcb.ca.gov/](http://geotracker.swrcb.ca.gov/);
16. California Department of Toxic Substances Control Management Board  
<https://dtsc.ca.gov/dtscs-cortese-list/>
17. North Coast Regional Water Quality Control Board  
<https://www.waterboards.ca.gov/northcoast/>
18. Sustainable Groundwater Management Act (SGMA), September 2014.  
<https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>
19. Santa Rosa Plain Watershed Groundwater Management Plan, Advisory Panel, 2014  
[https://rpcity.granicus.com/MetaViewer.php?view\\_id=4&clip\\_id=518&meta\\_id=43080](https://rpcity.granicus.com/MetaViewer.php?view_id=4&clip_id=518&meta_id=43080)

- 1. AESTHETICS:**
- 2. AGRICULTURE AND FOREST RESOURCES:**
- 3. AIR QUALITY:**
- 4. BIOLOGICAL RESOURCES:**
- 5. CULTURAL RESOURCES:**
- 6. GEOLOGY AND SOILS:**
- 7. GREENHOUSE GAS EMISSIONS:**
- 8. HAZARDS AND HAZARDOUS MATERIALS:**
- 9. HYDROLOGY AND WATER QUALITY:**
- 10. LAND USE AND PLANNING:**
- 11. MINERAL RESOURCES:**
- 12. NOISE:**
- 13. POPULATION AND HOUSING:**
- 14. PUBLIC SERVICES:**
- 15. RECREATION:**
- 16. TRANSPORTATION / TRAFFIC:**
- 17. UTILITIES AND SERVICE SYSTEMS:**
- 18. MANDATORY FINDINGS OF SIGNIFICANCE**