



# ***Proposed Negative Declaration***

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

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Publication Date: March 23, 2021  
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Permit Sonoma File Numbers: UPE20-0031  
Prepared by: Eduardo Hernández  
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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:** Lynch Road Animal Place Sanctuary

**Project Applicant:** Kim Sturla, Animal Place Non-Profit Corporation

**Property Owner:** Animal Place Non-Profit Corporation

**Project Agent:** Steve Brown, Adobe Associates, Inc.

**Project Location/Address:** 70 & 80 Lynch Rd., Petaluma, CA 94954

**APN:** 137-090-031

**General Plan Land Use Designation:** DA 30 (Diverse Agriculture)

**Zoning Designation:** DA (Diverse Agriculture) B6 30/3 (Acres per dwelling unit /Acres Minimum), LG/MTN (Taylor Sonoma Mayacamas Design Guidelines) SR (Scenic Resources) VOH (Valley Oak Habitat Combining District)

**Decision Making Body:** Permit Sonoma Director (with Hearing Waiver)

**Appeal Body:** Board of Zoning Adjustments

**Project Description:** See Item III, below

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below in Table 1 would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” or “Less than Significant with Mitigation” as indicated in the attached Initial Study and in the summary table below.

**Table 1.**

Topic Area	Abbreviation	Yes	No
Aesthetics	VIS		X
Agriculture & Forestry Resources	AG		X
Air Quality	AIR		X
Biological Resources	BIO		X
Cultural Resources	CUL		X
Energy	ENERGY		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	TRANS		X
Tribal Cultural Resources	TCR		X
Utilities and Service Systems	UTL		X
Wildfire	FIRE		X
Mandatory Findings of Significance	MFS		X

**RESPONSIBLE AND TRUSTEE AGENCIES**

Table 2 lists other public agencies whose approval may be required for the project, or who have jurisdiction over resources potentially affected by the project.

**Table 2.**

Agency	Activity	Authorization
Regional Water Quality Control Board (North Coast or San Francisco Bay)	Discharge or potential discharge to waters of the state	California Clean Water Act (Porter Cologen) – Waste Discharge requirements, general permit or waiver
Bay Area Air Quality Management District (BAAQMD)	Stationary air emissions	BAAQMD Rules and Regulations

**ENVIRONMENTAL FINDING:**

Based on the evaluation in the attached Initial Study, I find that the project described above could not have a significant effect on the environment, and a Negative Declaration is proposed.

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Prepared by: Eduardo Hernández on March 2, 2021



## ***Initial Study***

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

### **I. INTRODUCTION:**

Applicant Kim Sturla, from Animal Place Non-Profit Corporation, proposes the establishment of an Animal Sanctuary for rescued hens on an 11.92-acre agricultural parcel. The project also involves the construction of three new barns, visiting hours for the public to the site for occasional classes and events. A referral letter was sent to the appropriate Local, State and Federal agencies and interest groups who may wish to comment on the project.

This report is the Initial Study required by the California Environmental Quality Act (CEQA), prepared by Eduardo Hernández, Project Review Planner with the Sonoma County Permit and Resource Management Department (PRMD, AKA Permit Sonoma). Sturla and her Agent provided information on the project. Other reports, documents, maps and studies referred to in this document are available for review at PRMD or on the County's website at: <https://share.sonoma-county.org/link/iYmvX76V-iw/>

For more information, please send an e-mail to [Eduardo.Hernandez@sonoma-county.org](mailto:Eduardo.Hernandez@sonoma-county.org).

### **II. EXISTING CONDITIONS**

The project site is comprised of one legal parcel with an individual assessor's parcel number assigned. The 11.92-acre parcel with street addresses of 70 & 80 Lynch Rd., in Petaluma, is already developed. The lot is situated on the southern side of the road intersection of Lynch and Old Adobe Roads, in the Sonoma Mountain Plan Area. The site contains existing structures and driveway, and used to be utilized as a dog-training center.

### **III. PROJECT DESCRIPTION**

This project requires a use permit, due to the offering of classes and events for members of the public. The requested use permit is considered to be of minor nature since the project will house farm animals; which are allowed without limit on-site per the Zoning and Land Use designations, the construction of three new 288 sq. ft. barns, and visiting hours for the public. The site will be open to the public by reservation only, once a week on Saturdays from 11:00 a.m. to 4:00 p.m. The site will generally be open to receive up to 20 attendees, and four times a year it will host educational classes about animal care and behavior for up to 100 attendees. An administrative review for approval (AKA hearing waiver) was requested, and approval of this project and adoptions of this Negative Declaration may occur without a public hearing consistent with County Code (Sec. 26-92-040d).

The project site is zoned with the Scenic Resources (SR) combining district by the County (scenic corridor and scenic landscape unit). The project involves the construction of three 288 sq. ft. barns to help house the animals in the Sanctuary, which requires a Use Permit, and therefore the barns are subject to design review. Staff has reviewed the proposed 12 x 24 feet structures, and they have been deemed adequate. The barns will still require ministerial approval through building permit applications. The public will not be able to access the proposed barns; but will have access to the road and driveways, parking area, restrooms,

and designated lawn area for the classes and events.

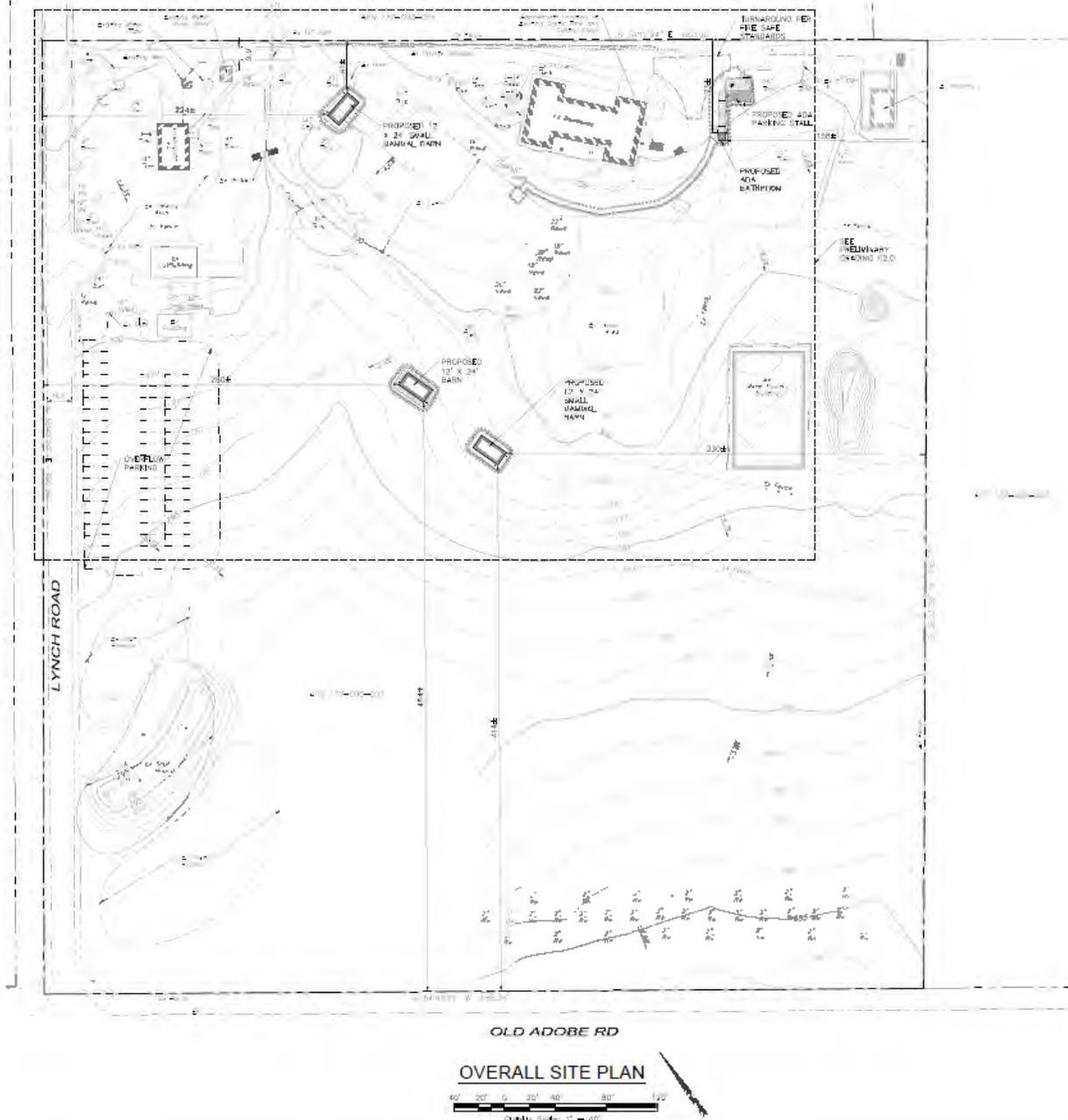


Figure 1. Site Plan

The 11.92-acre project lot is located on the southern side of the intersection of Lynch and Old Adobe roads. The project lays within the Taylor/Sonoma/Mayacamas Mountains area, which sets Local Area Development Guidelines for proposed new structures, except for agricultural structures. Because, the proposed animal sanctuary requires a Use Permit, it is therefore subject to the Local Area Development Guidelines.

The main purpose of the Sanctuary is to house rescued hens, who are available for adoption. The Sanctuary will also have a few permanent animals such as chickens, goats, sheep, and rabbits. There will be three employee farmhands living in the residence on-site that will be responsible for all animal care. Up to three volunteers will assist the farmhands. The Sanctuary will be open to visitors on Saturdays from 11:00 a.m. to 4:00 p.m. Visitors will be by reservation only, at no more than 20 people visiting a day. The

Sanctuary will host a maximum of four events a year on educational events surrounding animal care and behavior, for a maximum of 100 attendees. The classes and events will be held on the existing lawn area.

**PROJECT SITE AND SURROUNDING LANDS:**

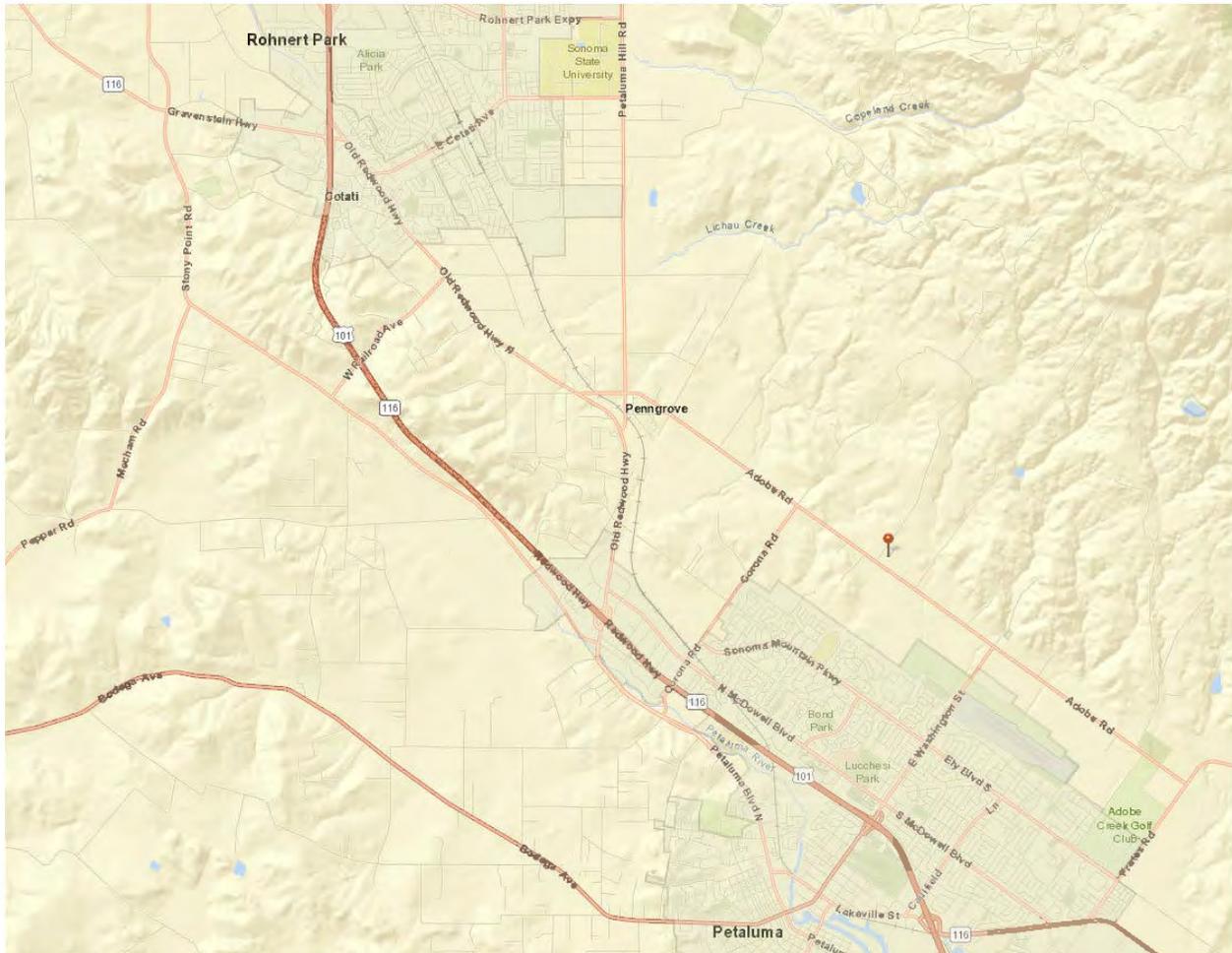


Figure 2. Vicinity Map

The 11.92-acre project site is located roughly 2 miles northeast of US Highway 101, and 2,000 feet from the Petaluma City limits. The area consists of one moderately flat parcel. The subject parcel, and all of those adjacent to it are zoned Agricultural.

The site is not served by water or sanitation districts; it does have existing well and septic systems on-site. The size of the project site is comparable to other DA zoned parcels in the vicinity and meets the minimum lot size of 10 acres.

Figure 2 shows the project site vicinity, while Figure 3 provides an aerial view of the project and its surrounding areas.



Figure 3. Aerial Map

#### IV. SETTING

The project site is located in unincorporated, rural agriculture area between Sonoma Mountain and the City of Petaluma. Access to the site is from Lynch Road. Surrounding land uses are predominantly agricultural and rural residential development. Nearby commercial operations include general contractor, nursery, and horse riding schools.

The proposed development is on the upper portion of the site. Stormwater sheet flows across the site to the southwest and drains into the ditch between the property's line and Old Adobe Road. There are no water bodies in the immediate vicinity of the site.

#### 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.

Some public comments were received in regards to this project. Comments of concern were in regards to the health of the animals and noise. The public comments were all addressed by the applicants directly to the members of the public who commented, as well as solved in consultation with County trustee agencies.

Consultation with the California Department of Fish and Wildlife (CDFW) was made; however, no

comments were received. No blue line streams pass by or through the property and there is no identified concerns for sensitive species on-site or its vicinity.

The project was also referred to the Northwest Information Center at Sonoma State University (NWIC, S.S.U.) for review of potential archaeological records through the California Historical Resources Information System (CHRIS). The NWIC Staff responded to the referral indicating a low possibility of containing unrecorded archaeological site(s) and, therefore, no further studies were recommended. The NWIC also recommended the County contact the local Native American tribes regarding traditional, cultural, and religious heritage values. The project was referred out to those local registered tribes. Lytton Rancheria and the Kashia Band of Pomo Indians responded to the referral stating they had no concerns at this time, and consultation was not requested. The County has a "discovery clause" which requires construction managers to halt construction and reach out to the authorities whenever cultural or archaeological resources are found during the ground disturbance of native soils; therefore, a condition of approval emphasizing this requirement is incorporated to this permit.

## VI. OTHER RELATED PROJECTS

There are no other known private or public projects in the area that may affect the proposed project, or the vicinity in a cumulative negative manner.

## 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.

Kim Sturla has agreed with the discussions made in this Initial Study, the 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:

**Except as provided in Public Resources Code Section 21099, would the project:**

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

Comment:

The Project site is located within a Scenic Resource combining district as identified by the Sonoma County General Plan: Scenic Corridor and Scenic Landscape Unit. The Zoning Ordinance exempts from design review agricultural structures (barns, stables, etc.) which do not require Use Permits, with the exception of properties subject to the Bennett Valley Area Plan or the Local Coastal Plan neither of which apply to this project. The project included the construction of three new barns, which would house animals as a refuge and some of them awaiting adoption; not production which would indicate an agricultural operation. These barns would not be constructed within the Scenic Corridor area, but would be inside the Scenic Landscape Unit area. Structures not visible from public roads are also exempt from design review. The proposed barns will be built 414 feet from the property line adjacent to Old Adobe Road (a public road and Scenic Corridor). The design of the barns has been reviewed and deemed adequate by Staff. The site is already developed, and the new structures seem fitting within their environment. The Project will not require any tree removal, construction, or grading that would degrade a scenic vista.

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) In non-urbanized areas substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

Comment:

The site is in a rural area, and has already been developed. As mentioned in Item 1.a above, a compatible use is proposed along with the construction of three barns, which are also compatible as they are usually allowed by right per the subject parcel zoning and land use designations. The Project design is considered to be fitting within its built environment as the colors and design are those of typical agricultural structures in the area. The project will not require the removal of any existing trees or structures.

Significance Level:

No Impact

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

Comment:

Three barns are proposed to be built, which will introduce new sources of light and glare. All new lighting will be reviewed with the building permit and is required to be down-cast, in compliance with the County's dark sky policy. The project, as proposed, will not create a visual impact and therefore no mitigation measures are required.

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 site does not include any farmland considered prime, unique, or of statewide importance; and therefore no lands of this character would be converted to a non-agricultural use.

Significance Level:

No Impact

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

Comment:

The project site is in a Diverse Agriculture zoning district, which allows agricultural uses, and is not included in a Williamson Act contract. The purpose of the Diverse Agriculture District, per Sec. 26-08-005 of the Sonoma County Zoning Code is *"to enhance and protect those land areas where soil, climate and water conditions support farming but where small acreage intensive farming and part-time farming activities are predominant, but where farming may not be the principal occupation of the farmer; and to implement the provisions of the diverse agriculture land use category of the General Plan and the policies of the Agricultural Resource Element."* The project proposes a farm animal sanctuary, construction of three barns, and limited events for educational purposes surrounding farming and animal care. These uses are compatible with both the parcel's Zoning designation and land use classification per the General Plan. The discretionary Use Permit is required for the animal sanctuary and public visitation aspect of the project; however, these uses are consistent with the Agricultural Resources Element of the Sonoma County General Plan.

Significance Level:

No Impact

- 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:

The project is not forest land and is not zoned Timberland Production (TP), or located near forest land or lands zoned TP, and therefore would not conflict with or have any effect on forest lands or lands zoned TP. The subject parcel and all of the parcels in the vicinity are zoned agricultural.

Significance Level:  
No Impact

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

Comment:  
The project is not forest land and is not located near any forest land, and would therefore not result in the loss of forest land.

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 forestland to non-forest use?**

Comment:  
The project does not involve other changes in the environment that could result in conversion of forestland to non-forest use. The project involves the establishment of limited public visitation on-site, under certain hours and special events around the farming subject. There are four events proposed to occur annually, with a limit capacity of 100 attendees per event. Approximately 540 sq. ft. of land adjacent to the access road would be used as visitor parking, which represents a small portion of the property.

Significance Level:  
Less than Significant 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/>), which is currently designated as a nonattainment area for state and federal ozone standards, the state PM<sub>10</sub> standard, and the state and federal PM<sub>2.5</sub> 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 (NO<sub>x</sub>) 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.

Significance Level:  
Less than Significant Impact

**b) 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?**

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<sub>x</sub>). The project will have no long-term effect on PM<sub>2.5</sub> and PM<sub>10</sub>, because all surfaces will be paved gravel, landscaped or otherwise treated to stabilize bare soils, and dust generation will be insignificant. Standard dust control best management practices are required to be implemented to minimize dust during construction.

Although the project will generate some ozone precursors from new vehicle trips caused by public visits to the animal sanctuary and limited events, 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<sub>x</sub>).

Significance Level:

Less than Significant Impact

**c) Expose sensitive receptors to substantial pollutant concentrations?**

Comment:

There are no sensitive receptors located within 1,000 feet of the proposed project. The proposed project would not emit stationary sources of criteria pollutants, and would support limited public vehicle trips to the animal sanctuary.

Significance Level:

No Impact

**d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?)**

Comment:

The project involves bringing rescued hens to the agricultural site, which is a suitable place for such use. Although some odor would be generated by the concentration of poultry on-site, is an expected element of the operation in Sonoma County where there is a "Right to Farm." Furthermore, the project was referred out to local agencies such as the County's Agricultural Commissioner's Office and Animal Control & Welfare; no concerns or conditions were provided for the project.

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:

There is no record of candidate, sensitive or special status species; nor identified critical habitat area for these types of species on the property. The project was referred out to the California Department of Fish and Wildlife (CDFW), and no response was provided. The project proposes the establishment

of an animal sanctuary, with limited access to the public during certain hours and times of the year for educational and adoption purposes, in an already developed parcel. The project involves the construction of three new barns, which are usually permitted by right on the property; except when they are not designated for agricultural use but other use such as the proposed sanctuary. Site improvements are limited to the building and parking footprints which would not result in adverse impacts to sensitive species or habitat.

Significance Level:  
No Impact

- 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:  
There are no riparian habitat or similar sensitive natural communities identified on or near the site.

Significance Level:  
No Impact

- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

Comment:  
No State of Federally protected wetlands were observed on-site.

Significance Level:  
No Impact

- 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:  
The project site is not located in an area that would affect any known migrating animal or nursery site. The project is not expected to conflict with any local policies or ordinances protecting biological resources. The project is not within an adopted habitat or natural community conservation plan.

Significance Level:  
No Impact

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

Comment:  
The site is located within the Valley Oak Combing District; however, the project does not involve the removal of any trees. Land uses and development consistent with the General Plan would not conflict with any General Plan policies requiring the protection of biological resources.

Significance Level:  
No 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:

There are no adopted habitat conservation plans or natural community conservation plans covering the project site, nor is it located in the Santa Rosa Plain. The proposed project would not be subject to any habitat conservation plan or natural community conservation plan and would not conflict with any such plans.

Significance Level:  
No Impact

## 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:

On May 15, 2020, Permit Sonoma staff referred the project application to Native American Tribes within Sonoma County to request consultation under AB-52. Only responses from the Kashia Band of Pomo Indians and Lytton Rancheria (two tribes) were received by Permit Sonoma Staff, both responses stated these tribes had no concerns or comments on the project. The Northwest Information Center at Sonoma State University (NWIC, S.S.U.) was also referred the project, for which they responded there are no records of any previous cultural resources found on-site and there is a low possibility for archaeological site(s) being found at the project site. The County has a "discovery clause" incorporated in Sec. 11.14.050 of the County Code, which requires that, in the event of any cultural or archaeological discovery on-site during native grounds disturbance, the construction workers must halt operations and contact the local agencies. This standard "discovery clause" requirement has been included as a Condition of Approval.

Significance Level:  
Less than Significant Impact

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

Comment:

Discussion in Section 5.a covers this section.

Significance Level:  
Less than Significant Impact

- c) **Disturb any human remains, including those interred outside of dedicated cemeteries?**

Comment:

There are no known burial sites on the project site or in its vicinity.

Significance Level:  
No Impact

## 6. ENERGY:

Would the project:

**a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Comment:

Short-term energy demand would result from construction activities related to the project. This would include energy demand from worker and construction equipment usage. Long-term energy demand would result from vehicle trips by the public and volunteers. Operation of the new barns would result in energy usage from electricity for lighting at minor intensity.

Operation of the proposed project would result in a negligible increase in energy usage relative to existing conditions in Sonoma County. However, this increase in energy use would not be wasteful or inefficient because of efficiencies incorporated in the barns design to comply with building codes and standards.

Significance Level:

Less than Significant

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

Comment:

The proposed barns would comply with any applicable renewable energy or energy efficiency codes, which will be verified during the review of building permits.

Significance Level:

Less than Significant

## **7. GEOLOGY AND SOILS:**

Would the project:

**a) Directly or indirectly cause 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. The General Plan provides uniform standards and policies, including the requirement for development of project specific geotechnical reports and associated studies to determine the potential impacts and reduce risks to structures and people from a proposed project. The proposed project would meet State and County design and development standards, thereby reducing project level impacts to less than significant.

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.

Significance Level:

Less than Significant Impact

**iii. Seismic-related ground failure, including liquefaction?**

Comment:

Strong ground shaking can result in liquefaction, which is the sudden loss of shear strength in saturated sandy material, resulting in ground failure. Areas of Sonoma County most at risk of liquefaction are along San Pablo Bay and in alluvial valleys. According to General Plan Public Safety Element Figure PS-1c (Liquefaction Hazard Areas), the project site is not located within a liquefaction hazard area. Regardless, all structures would be required to meet building permit requirements, including seismic safety standards and soil test/compaction requirements.

Significance Level:

Less than Significant Impact

**iv. Landslides?**

Comment:

The proposed project site is on flat topography, thus impacts from naturally occurring landslides are not significant. Regardless, structures would be required to meet County building permit requirements, including seismic safety standards and soil test/compaction requirements.

Significance Level:

No Impact

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

Comment:

The County adopted a Grading Ordinance and Standard Conditions of Approval, which will help ensure compliance with all erosion control and water quality 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 (BMPs). Therefore, no significant adverse soil erosion or related soil erosion water quality impacts would occur 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.

The General Plan EIR evaluated potential cumulative soil erosion and related impacts. The project as subject to uniformly applied development policies and standards will not result in any new significant geology and soils impacts not adequately evaluated by the General Plan 2020 EIR (see Impacts 4.7-1, 4.7-2, 4.7-3, 4.7-4, 4.7-7, and 4.7-8).

Significance Level:

Less than Significant Impact

**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 but it is not located on an unstable geologic unit or soil, and is a flat site that is not subject to lateral spreading, subsidence, liquefaction or collapse.

The project as subject to uniformly applied development policies and standards will not result in any new significant geology and soils impacts not adequately evaluated by the General Plan 2020 EIR (see Impacts 4.7-1, 4.7-2, 4.7-3, 4.7-4, 4.7-7, and 4.7-8).

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 potential for expansive soils exist, and although the area is level, the loss of soil through erosion during the construction process is possible if work continues through the rainy season.

Expansive soils are generally high in clays or silts that shrink or swell with variation in moisture. Standards in the General Plan and additional safeguards provided by California Building Code requirements, and other County standards provide sufficient protections to reduce the impacts from construction on these sites to a less than significant level. The General Plan EIR determined that implementation of uniform standards would reduce impacts to less than significant. The proposed project is subject to these standard measures, which would result in the project having a less than significant impact.

Significance Level:

Less than Significant 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 can support the existing septic system and their required expansion area.

Significance Level:

No Impact

- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Comment:

See discussion under Cultural Resources Section 5-a above. The site does not contain any known unique paleontological resources or unique geologic feature.

Significance Level:

No Impact

## **8. 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:

The proposed project is not anticipated to generate GHG emissions that would have a significant impact on the environment. The project involves limited public visits during specific times of the day, and up to four events a year with an estimated average of 25 cars per event.

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 adopted a Climate Change Action Resolution (May 8, 2018) "to support a county-wide framework for reducing greenhouse gas emissions and to pursue local actions that support the identified goals therein." As a response to litigation against the County's proposed Climate Action Plan and subsequent decision not to appeal the court's ruling, the County's resolution demonstrates commitment to working towards the RCPA's countywide greenhouse gas (GHG) emissions reduction targets: 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050. The project is well below the screening criteria for GHG impact analysis.

The project, by implementing current County codes, would be consistent with Local and State plans, policies, or regulations adopted for the purpose of reducing emissions of greenhouse gases. Therefore, the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Significance Level:

Less than Significant Impact

## **9. 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:

The project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Small amounts of potentially hazardous materials may be used on this project such as fuel, lubricants, and cleaning materials related to the barns use and limited events. 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 help reduce risks of the project uses affecting human or biological environment.

Significance Level:

Less than Significant Impact

**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:

Hazardous materials may be spilled during the construction of the barns; however, the applicants are required to implement BMPs consistent with federal, state and local regulations during construction. 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 project site is not within 0.25 miles of an existing or proposed school.

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 site is not included on a list of hazardous materials sites pursuant to Government Code Section 65962.5.

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 result in a safety hazard or excessive noise 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 (CALUP).

Significance Level:

No Impact

- f) 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

- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

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.

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 site under a Local Responsibility Area designated to the Rancho Adobe Fire Protection District. The proposed project is located in a developed site. 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.

Significance Level:  
Less than Significant Impact

## 10. HYDROLOGY AND WATER QUALITY:

**Would the project:**

- a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

Comment:

The project site does not contain a designated blue line stream, and development of the project would not violate any water quality standards or waste discharge requirements that could degrade surface or groundwater quality based on the implementation of standard grading, stormwater and septic requirements.

Significance Level:  
No Impact

- b) **Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

Comment:

The project site is located in Groundwater Availability Class 3 – Marginal Groundwater Basin area. A letter dated June 29, 2020 prepared and stamped by Civil Engineer Steven R. Brown was provided which summarized existing and proposed water use and supply. The letter specified that water use of the proposed project would be equivalent to the existing water use, with an annual use rate of less than 4-acre feet per year. Water use for domestic use and landscape irrigation is not expected to change. Water use for the Sanctuary is expected to be similar to the permitted dog-training center. The analysis of the report was found to be well documented and of appropriate detail and effort to support the findings. The project has been condition in order to help ensure the operation will count with enough water supply and also for it to not exceed the aforementioned 4-acre feet per year usage. The project is found to have a less than significant impact and no additional analysis is required at this 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?**
- i. **would result in substantial erosion or siltation on- or off-site?**

Comment:

Potential water quality impacts associated with the proposed project would include short-term construction-related erosion/sedimentation and long-term operational stormwater discharge. The proposed barns represents a small area of the parcel and would not require significant grading to accommodate them, therefore the project is not expected to redirect flows or otherwise affect surface drainage patterns. Compliance with the County grading regulations is aimed at capturing and treating all project runoff onsite, thereby reducing the potential for soil erosion and sediment delivery from the site.

Significance Level:

Less than Significant Impact

- ii. **substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;**

Comment:

The proposed project will not substantially increase the rate or amount of surface runoff on or off site. Prescriptive Low Impact Development standards are required to be implemented.

Significance Level:

No Impact

- iii. **create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;**

Comment:

Increased stormwater runoff from development projects including agricultural structures, could increase stormwater runoff, influencing local drainages to handle this increased runoff. On-site construction would result in new impervious surface and generation of stormwater. The project would require a grading permit, which would not be issued until all required stormwater control and treatment options have been incorporated in compliance with all applicable standards, including flood control requirements.

Significance Level:

Less than Significant Impact

- iv. **impede or redirect flood flows?**

Comment:

The project site is not subject to flooding, and it will not redirect flood flows.

Significance Level:

No Impact

- d) **In flood hazard, tsunami, or seiche zones; risk release of pollutants due to project inundation?**

Comment:

The proposed project site is not located within a 100-year flood hazard area, and is not subject to seiche or tsunami.

Significance Level:

No Impact

- e) **Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

Comment:

Degradation of water quality has been evaluated above in Hydrology and Water Quality Section 10.a. As noted in that section, implementation of standard grading, stormwater, and erosion control requirements will minimize water quality impacts.

Standards for issuance of grading, drainage, or building permits require submittal of a drainage report that is compliant with applicable water quality control plans and/or groundwater management plans. Conformance to these uniformly applied standards will adequately treat stormwater. BMPs shall be designed to treat storm events and associated runoff to the channel forming discharge storm event which is commonly referred to at the two year 24-hour storm event.

The site is located within the Petaluma Valley Priority Ground Water Basin. As mentioned in Section 10.b above; a water study was made, and conditions of approval are provided to help ensure an adequate amount of water is consumed by the project.

The proposed construction associated with the development will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Significance Level:

Less than Significant Impact

## 11. 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 major physical structure (such as a large 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) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

Comment:

The proposed project would not conflict with applicable land use plans, policies, or regulations, including the General Plan and Zoning Code. Development of the proposed project would be in alignment with these uniform plans and policies of the County, including development standards and Building Codes. The proposed project would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

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. The discretionary approval is required to allow the animal sanctuary and visitors on-site, which is allowed by the County zoning ordinance and General Plan.

Significance Level:

Less than Significant Impact

## 12. 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

## 13. NOISE:

Would the project:

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Comment:

County noise standards for non-transportation operation noise are provided in Table NE-2 of the General Plan. These thresholds may be adjusted based on site-specific conditions, such as a very high or very low ambient noise level, specific types of noise (e.g., dog barking, simple tone noises), or short-term noise sources permitted to occur no more than six days per year (e.g., concerts, special events). The primary noise sources associated with the project are limited vehicle traffic, and activities and events associated with the proposed educational aspect of the project. Temporary ambient noise levels associated with the construction of the barns are considered to be minimal, as construction will occur not closer than 41 feet from any neighboring property line.

Furthermore, the project was reviewed by a County Health Specialist, which confirmed noise surpassing the established limits in the County General Plan is not expected. The limits, located in the Noise Element Table NE-2, were shared with the applicant and they agree the noise created by the normal operations of the project will be kept below the established limits. The limits, which were added as part of the project's conditions of approval, are shown below:

TABLE NE-2: Maximum Allowable Exterior Noise Exposures

Hourly Noise Metric <sup>1</sup> , dBA	Daytime (7 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7 a.m.)
L50 (30 minutes in any hour)	50	45
L25 (15 minutes in any hour)	55	50
L08 (4 minutes 48 seconds in any hour)	60	55
L02 (72 seconds in any hour)	65	60
<sup>1</sup> The sound level exceeded n% of the time in any hour. For example, the L50 is the value exceeded 50% of the time or 30 minutes in any hour; this is the median noise level. The L02 is the sound level exceeded 72 seconds in any hour.		

Significance Level:  
Less than Significant Impact

**b) Generation of excessive groundborne vibration or groundborne 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 the standard daytime hours from 7:00 a.m. to 10:00 p.m. 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) For a project located within the vicinity of a private airstrip or 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 project is located approximately 1 mile away from the Petaluma Municipal Airport. Intermittent aircraft noise is not expected to reach levels that would have significant environmental impact on the on the project. The Airport Noise/Land Use Compatibility Standards of Sonoma County CALUP are not applicable to the subject parcel, as this is outside of the required referral area identified by the County; therefore no further analysis is required.

Significance Level:  
Less than Significant Impact

## 14. POPULATION AND HOUSING:

**Would the project:**

**a) Induce substantial unplanned 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 any houses or additional businesses or infrastructure,

and therefore would not induce substantial population growth.

Significance Level:  
No Impact

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

Comment:  
No housing will be displaced by the project and no replacement housing is proposed to be constructed.

Significance Level:  
No Impact

## **15. 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 ratios, 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. The proposed project does not propose new housing, nor would it generate a significant new demand for housing in the area, three employee farmhands will live in existing housing on-site and up to three volunteers will assist the farmhands. This small increase in employment opportunities is not anticipated to result in an indirect increase in population requiring construction of new or altered government facilities. Therefore, the project does not necessitate or facilitate construction of new public facilities.

Significance Level:  
No 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 the proposed project.

Sonoma County Code requires that all new development meet Fire Safe Standards (Chapter 13). The County Fire Marshal reviewed the project 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. Therefore, the project would not necessitate or facilitate construction of new fire protection facilities in order to maintain acceptable service ratios or response times.

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 the proposed project, similarly as mentioned in Section (i) above.

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. No new schools are reasonably foreseeable as a result of this development, as this project does not involve subdivisions or residential development.

Significance Level:

No 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 does not involve residential development, and the maximum of six new job opportunities would not be anticipated to result in a substantial number of new residents moving to the area and requiring additional park facilities. Therefore, the project would not necessitate or facilitate construction of new parks resulting in environmental impacts in order to maintain acceptable service ratios or response times.

Significance Level:

No Impact

**v. Other public facilities?**

Comment:

The project would not be served by public sewer or water facilities. No other public facilities are anticipated to be required as a result of the project.

Significance Level:

Less than Significant Impact

**16. 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:  
Less than Significant Impact

## 17. TRANSPORTATION:

**Would the project:**

- a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?**

Comment:  
The project would not conflict with any program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities.

There are currently no pedestrian facilities near the project site. Due to the rural and agricultural nature of the project area, it is reasonable to assume there would not be any pedestrian traffic generated by the project and therefore that no facilities are needed.

The access road, Lynch Road, is not part of the County's Bicycle & Pedestrian Plan (B&PP). The road where Lynch Road is rooted, Adobe Road, is a Class II Bikeway as recognized by the B&PP. The Adobe Road bikeway is identified by painted pavement and bike lane signs. As the project proposes only limited amount of visitors, the sporadic public vehicular visitations are not expected to interrupt transient cyclists.

Significance Level:  
Less than Significant Impact

- b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

Comment:  
New state law also requires evaluation of a project's impact on added Vehicle Miles Travels (VMT). The County is currently developing guidelines to adopt these new regulations. At this time, County staff calculated the average daily trips produced by the project with the information provided by the applicant. The project will include up to 4 events a year with a maximum count of 100 attendees, the Sanctuary will be open to up to 20 members of the public by appointment for classes or visits once a week, up to 3 volunteers will help, and 3 employees will live on-site. It is calculated that no more than 180 trips would be generated by the development during an event week, providing a daily average trip count of 25.71 per day during said week. When calculating for a whole calendar year, the calculated average daily trip count is 15.16. The calculated daily trip average is well below the 110-trip threshold identified by the State's Office of Planning and Research (OPR) to screen-out projects considered "small" from further VMT analysis.

Significance Level:  
Less than Significant Impact

**c) Substantially increase hazards due to geometric 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. However, hazards to drivers, cyclists, and pedestrians; although extremely low, could be a possibility during construction operations. The Sonoma County Department of Transportation and Public Works (DTPW) has established guidelines which require encroachment permits to be obtained prior to construction which would require temporary occupancy within the County's right-of-way. The encroachment permit process requires the permittee to establish safety measures to help prevent hazards to any person transiting by the construction area. This temporary construction-related impact will cease upon project completion, and DTPW guidelines will further help reduce the impact to a level of insignificance.

Significance Level:  
Less than Significant Impact

**d) 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.

Significance Level:  
Less than Significant Impact

**e) Result in inadequate parking capacity?**

Comment:  
The site is already developed with structures and parking for employees and some visitors. Since the project proposes a few events a year with a maximum attendee count of 100, a new parking lot with a count of 50 spaces would be constructed on the northwest side of the property. Considering the vehicular occupation average would be 2 or more, the proposed parking expansion is adequate.

Significance Level:  
Less than Significant Impact

## **18. TRIBAL CULTURAL RESOURCES:**

**Would the project:**

a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California native American tribe, and that is:**

i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**

Comment:

The project site is already developed, and is not part of the local or state register of historical resources.

ii) **A resource determined by the lead agency. In its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Comment:

See Archaeological Resources Section 5.a through 5.c.

Significance Level:

Less than Significant Impact

## 19. UTILITIES AND SERVICE SYSTEMS:

Would the project:

a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

Comment:

Domestic and commercial wastewater disposal will be provided by existing on-site septic systems and therefore would have no impact. The project would also be served by an existing well and connected to electric and gas services.

Significance Level:

No Impact

b) **Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

Comment:

Impacts have been addressed in Hydrology Subsection 10 above. The proposed development will remain with the existing water supply, and the proposed use would not result in a significant increase in water demand.

Significance Level:

Less than Significant Impact

c) **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:

An existing septic system will serve the project; therefore, there will be no sewage treatment by an off-site provider.

Significance Level:

No Impact

**d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

Comment:

The proposed development will not generate solid waste in excess of State or local standards, in excess of the capacity of local infrastructure, negatively impact the provision of solid waste services, or impair the attainment of solid waste reduction goals. Solid waste, recycling, and green waste services at the site will be provided by Recology Sonoma-Marín. Waste is transported to the central disposal site on Mecham Road in Petaluma, which has a maximum permitted throughput of 2,500 tons per day and a remaining capacity of approximately 9.1 million cubic yards. The landfill is estimated to remain in operation until 2034 (CalRecycle, 2018). The proposed project will not result in a significant increase in solid waste disposal at the central disposal site. Conditions of approval provided by a County Health Specialist will help ensure there is no significant impact in this matter.

Significance Level:

Less than Significant Impact

**e) Comply with federal, state, and local management and reduction 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

## **20. WILDFIRE:**

**If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:**

**a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**

Comment:

The proposed project is located within a Moderate Fire Hazard Severity Zone within the State Responsibility Area (CAL FIRE Sonoma County Draft Fire Hazard Severity Zones in LRA Map, 2007). Fire protection services are provided by the Rancho Adobe Fire Protection District. The project was reviewed by the Department's Fire Prevention plan examiner, which recommended its approval with specific conditions to help minimize fire hazards. The project was also referred out to CAL FIRE, which did not respond. The project is not expected to substantially impair an emergency response or evacuation, as the new structures are easily accessible and do not obstruct pass to others.

Significance Level:

Less than Significant Impact

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

Comment:

The project site has minor slopes and fair altitude; therefore is not exposed to high prevailing winds. Two of the new structures would occupy areas without other structures in its surroundings, which may affect the existing wind patterns; however the project review made by the local Fire Prevention Division and the current service by the local Fire District, indicate there would be a less than significant impact on this matter.

Significance Level:

Less than Significant Impact

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk of that may result in temporary or ongoing impacts to the environment?**

Comment:

The new structures may have electrical, which could ignite a fire on-site. However, any electrical connections would require building permits and review by Permit Sonoma, which would ensure safety elements from the State Building Code are met.

Significance Level:

Less than Significant Impact

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

Comment:

Public, workers, and structures are part of this project. The project site is fairly flat, and therefore, risks involving ground stability are improbable.

Significance Level:

No Impact

## **21. 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?**

No 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)?**

No Impact

- c) Does the project have environmental effects, which will cause substantial adverse effects on**

**human beings, either directly or indirectly?**

No Impact

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