



Proposed Mitigated Negative Declaration

Sonoma County Permit and Resource Management Department
2550 Ventura Avenue, Santa Rosa, CA 95403
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Permit Sonoma File Number: MNS20-0006
Prepared by: Eduardo Hernández at
Phone: (707) 565-1735

Pursuant to Section 15071 of the State CEQA Guidelines, this proposed Mitigated 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: 19190 Old Winery Rd Minor Subdivision

Project Applicant/Operator: Ridge Design and Build LLC

Project Location/Address: 19190 Old Winery Rd., Sonoma, CA 95476

APN: 127-191-012

General Plan Land Use Designation: Rural Residential, 2-acre density (RR 2)

Zoning Designation: Rural Residential, 2-acre density (RR B6 2), Riparian Corridor 100/25 ft. setback (RC 100/25), Valley Oak Habitat (VOH) and Vacation Rental Exclusion Zone (X)

Decision Making Body: Sonoma County Project Review and Advisory Committee

Appeal Body: Sonoma County Planning Commission

Project Description: See Item III, below

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below 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. Summary of Topic Areas

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	WILD		X

RESPONSIBLE AND TRUSTEE AGENCIES

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

Table 2. Agencies and Jurisdiction

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
State Water Resources Control Board	Generating stormwater (construction, industrial, or municipal)	National Pollutant Discharge Elimination System (NPDES) requires submittal of NOI

Bay Area Air Quality Management District (BAAQMD)	Stationary air emissions	BAAQMD Rules and Regulations (Regulation 2, Rule 1 – General Requirements; Regulation 2, Rule 2 – New Source Review; Regulation 9 – Rule 8 – NOx and CO from Stationary Internal Combustion Engines; and other BAAQMD administered Statewide Air Toxics Control Measures (ATCM) for stationary diesel engines
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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: Eduardo Hernández

Date: January 31, 2022



Expanded Initial Study

Sonoma County Permit and Resource Management Department

2550 Ventura Avenue, Santa Rosa, CA 95403

(707) 565-1900 · FAX (707) 565-1103

I. INTRODUCTION:

Ridge Design and Build LLC, with the assistance of Bear Flag Engineering Inc., is proposing to subdivide an existing parcel into three single family residential parcels at 19190 Old Winery Road in Sonoma. The project site is an existing 6.32-acre rural residential parcel (APN 127-191-012) located on the east side of Old Winery Road. Land uses surrounding the project site consist of residences and vineyards to the north and east, and residences to the west and south. Most of the project site is undeveloped, as the site only contains a 975 sf residence, two sheds, one well and one septic system. All existing development is within 320 feet from the northwest property line (front of the parcel).

The proposed subdivision would consist of the following: parcel 1 at 2.09± acres, parcel 2 at 2.20± acres, and parcel 3 at 2.03± acres. An 18-foot wide paved private road would be developed to provide access to the new lots and would include four turnouts and a turnaround meeting local fire department standards. The project does not include construction of any structures; however, future residential development on the proposed lots consistent with the zoning code can be expected.

A referral letter was sent to the appropriate local, state, 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). The report was prepared by Eduardo Hernández, Project Review Planner with the Sonoma County Permit and Resource Management Department (also known as Permit Sonoma). Information on the project was provided by representatives from Ridge Design and Build LLC, and Bear Flag Engineering Inc. Technical studies were provided by qualified consultants to support the conclusions in this Expanded Initial Study. Technical studies, other reports, documents, and maps referred to in this document are available for review through the Project Planner, or the Permit and Resource Management Department (Permit Sonoma) Records Section.

Please contact Eduardo Hernández, Planner III, at Eduardo.Hernandez@sonoma-county.org or (707) 565-1735 for more information.

II. SITE LOCATION AND SETTING

The proposed minor subdivision would be located at 19190 Old Winery Road (Figures 1 through 3). The site is currently developed with a single-family residence and accessory structures. The 6.32-acre parcel has a zoning designation of Rural Residential of 2 acres density (RR B6 2); and combining districts of Riparian Corridor 100/25 ft. setback (RC 100/25), Valley Oak Habitat (VOH) and Vacation Rental Exclusion Zone (X). The project setting is low-density residential with most of the parcel undisturbed, and located in Sonoma approximately 1.7 miles from downtown Sonoma. The project site is served by an existing private well, and primary and secondary septic system areas. The property falls under a local responsibility fire protection response area, and is served by the Schell-Vista Fire Protection District.

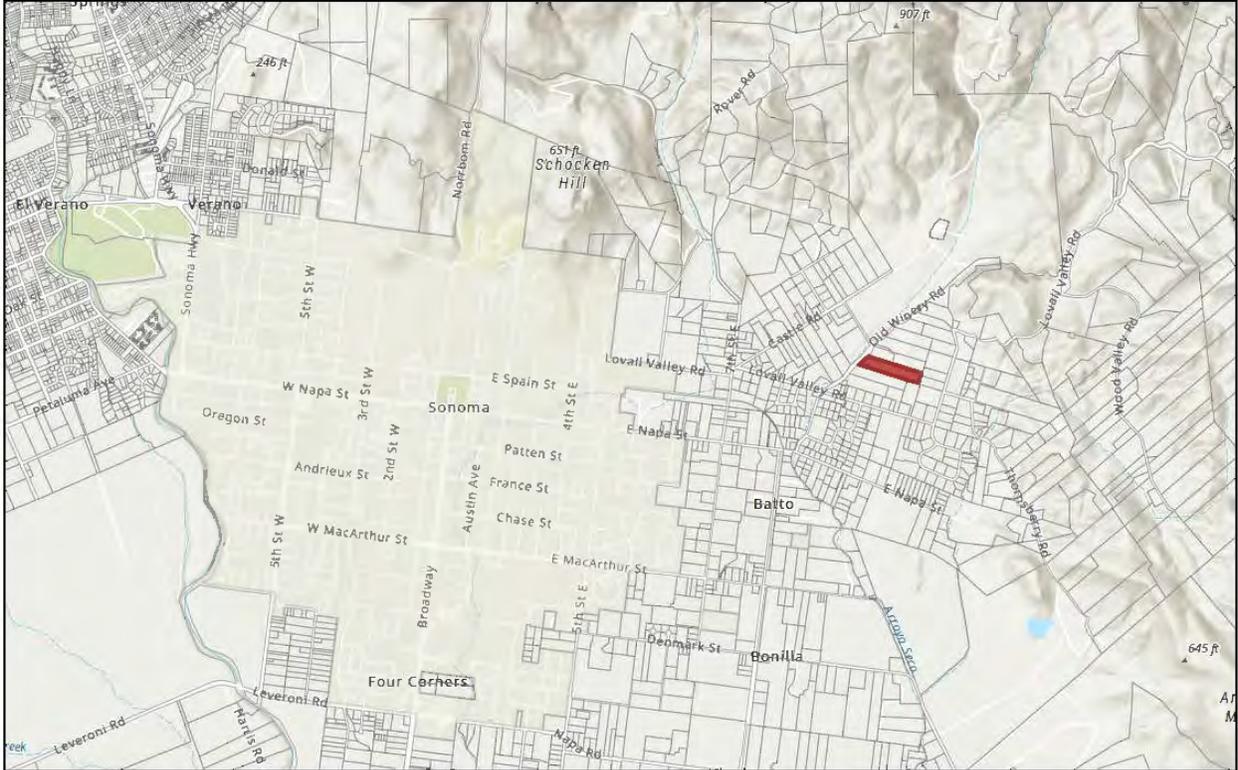


Figure 1. Project location (source: esri, 2021)



Figure 2. Aerial map (source: esri, 2021)

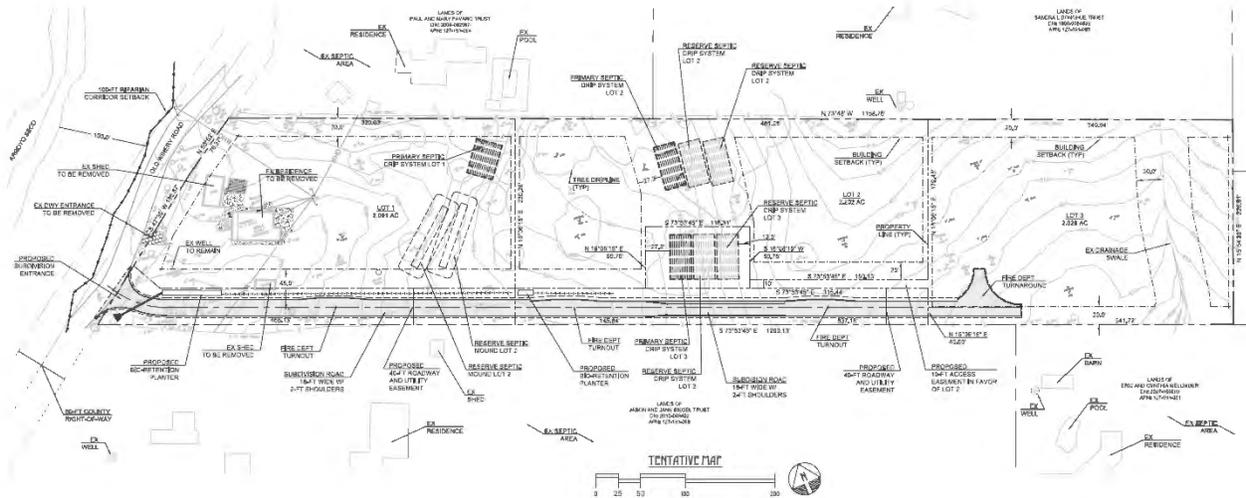


Figure 3. Tentative Map (source: Bear Flag Engineering, 2021)

III. PROJECT DESCRIPTION

Ridge Design and Build LLC proposes a minor subdivision to turn one 6.32-acre parcel into three separate single-family residential parcels located at 19190 Old Winery Road, in Sonoma, California. The proposed three-parcel subdivision would consist of the following: parcel 1 at 2.09± acres, parcel 2 at 2.20± acres, and parcel 3 at 2.03± acres. The project site is not located within the boundaries of an urban service area, and each of the proposed parcels would be served by an on-site well and septic systems. The project construction would include earthwork, grading, paving, and installation of utilities. The site improvements include a maximum cut of 600 cubic yards (CY) and maximum fill of 600 CY. Future development is anticipated on the newly created parcels, including one single-family residence per parcel.

Currently, access to the site is via Old Winery Road. The project would include the construction of an 18-foot-wide paved private road with 2-foot shoulders, and four fire department turnouts and a turnaround as approved by the Sonoma County Fire Marshal. A 40-foot-wide roadway and utility easement is proposed to serve all three new parcels off Old Winery Road.

Topography: The site is relatively flat, with a slope less than 2% and elevations ranging from 521 to 497 feet above sea level. An existing drainage swale exists within the 100 feet southeastern portion.

Drainage: Site drainage consists primarily of sheet flow and surface infiltration, which generally flows from the higher elevations at the southern portion of the site to the lower northern areas. There are two primary drainage courses at the project site. The first is through gentle slopes running from virtually east to west (for which two bio-retention planters are proposed) and the second is a swale on the southeastern end of the project site.

Vegetation: Most of the parcel is undisturbed land covered by native grasses and some oak trees. The Valley Oak (*Quercus lobata*) receives special consideration, per the County's Tree Protection Ordinance. At least 14 trees, including oaks, would be removed to accommodate the access road. Additional trees may need to be removed to make space for future development on-site.

Proposed buildings and uses: The project does not propose any buildings; however, it is anticipated that each of the three new parcels would be developed with single-family residences in the future.

Parking: All parking for the newly created lots would be located within each parcel. There shall not be less than one covered off-street parking for each dwelling unit, per the County's Zoning Code.

Access: All access and egress for vehicles would occur via Old Winery Road, a publicly road. The project includes construction of an 18-foot-wide paved private road with 2-foot shoulders and four turnouts and a

turnaround per fire safety standards.

Wastewater disposal: Parcel 1 would be served by an existing septic system, and parcels 2 and 3 would have their own new systems.

Stormwater management: A stormwater management plan has been designed to meet a 100% capture for the project area. Stormwater treatment would be provided by existing vegetation between the proposed improvements and downhill drainage courses. Runoff would be allowed to flow over the existing vegetated buffer areas and into bio-retention planters.

Water supply: Parcel 1 would be served by an existing well, and parcels 2 and 3 would have their own new wells.

Landscaping: There is no proposed landscaping plan nor are landscaping improvements currently anticipated. However, future landscaping would be limited to xeriscape plantings per the applicant's agreement and a Note on the Map.

Grading and earthwork: Project improvements would involve a maximum cut of 600 CY and maximum fill of 600 CY.

Construction: No construction of residence is proposed as part of this project. The construction schedule of the access road and supporting utilities has not been determined but would need to occur within 18 months after approval of the tentative map (County Code Sec. 25-46). Alternatively, the property owner would be able to enter into a subdivision improvement agreement and construct the access road and supporting utilities within a period of two years following the filing of the Final Map (Sec. 26-50).

IV. ISSUES RAISED BY THE PUBLIC OR AGENCIES

A referral packet was drafted and circulated on October 23, 2020, 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.

As of November 17, 2021, the project planner has received responses to the referral from the following departments and agencies: Permit Sonoma Building Inspection, Permit Sonoma Natural Resources, Permit Sonoma Project Review Health Specialist, Permit Sonoma Fire Prevention, Permit Sonoma Survey & Land Development, Permit Sonoma Engineering and Water Resources, Sonoma County Assessor's Office, Sonoma County Department of Transportation and Public Works, Northwest Information Center, Graton Rancheria, and Lytton Rancheria. No tribal entities requested further consultation. The referral responses included several project subdivision permit conditions of approval.

A neighborhood notification letter was sent on October 27, 2020, to each owner on record of property within 300 feet of the subject property. The project planner received multiple public inquiries about the project and zero stands of opposition.

V. 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.

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

1. AESTHETICS

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 is not in an area designated as visually sensitive by the Sonoma County General Plan. It is not located on a scenic hillside, nor would it involve construction or grading that would affect a scenic vista. The proposed buildings would be screened from view from public roads and parks by existing vegetation. The viewshed of the project area as seen from public roads and parks will not substantially change as a result of the project.

Significance Level:

No 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 proposed project would result in a three-lot subdivision and enable future development of three single-family residential homes. The project is consistent with the land use designation and zoning for the site. The purpose of the Rural Residential zone is to *"preserve the rural character and amenities in areas best utilized for low-density residential development."*

Following County Visual Assessment Guidelines, public viewpoints were considered for determining the project's visibility to the public. Based on the Visual Assessment Guidelines, Table 1: Site Sensitivity, the project location would be considered "Moderate" because:

The site or portion thereof is within a rural land use designation and surrounded by other rural development, but the site has no land use or zoning designations protecting scenic resources. The project vicinity is characterized by rural development.

Based on County Visual Assessment Guidelines, Table 2: Visual Dominance, the project would be considered inevent because the project site is flat and new homes would generally not be visible from public view because of intervening natural land forms or vegetation."

The project's visual effect on the visual character or quality of the site and its surroundings was determined based on County Visual Assessment Guidelines, Table 3: Thresholds of Significance for Visual Impact Analysis.

Table 3

Sensitivity	Visual Dominance			
	<i>Dominant</i>	<i>Co-Dominant</i>	<i>Subordinate</i>	<i>Inevent</i>
<i>Maximum</i>	Significant	Significant	Significant	Less than significant
<i>High</i>	Significant	Significant	Less than significant	Less than significant
<i>Moderate</i>	Significant	Less than significant	Less than significant	Less than significant
<i>Low</i>	Less than significant	Less than significant	Less than significant	Less than significant

Considering the project site's "Moderate" sensitivity and the project's "Inevent" visual dominance, the project would be considered to have a less-than-significant effect on the existing visual character or quality of the site and its surroundings.

Significance Level:

Less than Significant Impact

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

Comment:

The project does not propose any structures, but at future buildout, residential structures will introduce new sources of light and glare. Lighting on future development will be required to be Dark Sky compliant or a similar certification.

Significance Level:

Less than Significant Impact with Mitigation Incorporated

Mitigation Measure VIS-1:

Prior to issuance of building permits, an exterior lighting plan shall be submitted for review by Permit

Sonoma Project Review staff. Exterior lighting shall be low mounted, downward casting and fully shielded to prevent glare. Lighting shall not wash out structures or any portions of the site. Light fixtures shall not be located at the periphery of the property and shall not spill over onto adjacent properties or into the night sky. Floodlights are not permitted.

Mitigation Monitoring VIS-1:

Permit Sonoma shall not issue a Building Permit until an exterior night lighting plan has been submitted that is consistent with the approved plans and County standards. Permit Sonoma shall not sign off final occupancy on the Building Permit until a site inspection of the property has been conducted that indicates all lighting improvements have been installed according to the approved plans and conditions. If light and glare complaints are received, Permit Sonoma shall conduct a site inspection and require the property be brought into compliance or initiate procedures to revoke or modify the permit.

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:

According to the Sonoma County Important Farmlands Map, the project site contains approximately 4.28 acres of designated Important Local Farmland. The site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Currently, there is no farm operation on-site, and development is not proposed other than subdividing the parcel into three independent lots. The intent is to develop each lot with a residence in the future, consistent with the Rural Residential designation of the site where residential uses are primary and farming uses are secondary.

Significance Level:

No Impact

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

Comment:

The project site is zoned Rural Residential (RR 2) which allows single-family residential development, lots at minimum of 1.5 acres in size, and a residential density of 2 acres minimum per unit. The project site is not included in a Williamson Act contract.

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 site is not in a Timberland Production zoning district and the project would not cause a rezoning of forest land.

Significance Level:

No Impact

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

Comment:

The project site is not designated as forest land, and the project would not convert forest land to non-forest land use. Approximately 14 trees would be removed to accommodate the subdivision road. Additional trees may be removed to accommodate future development on the new parcels. However, project related tree removal does not constitute loss or conversion of forest land.

Significance Level:

Less than Significant Impact

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

Comment:

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

Significance Level:

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), which is currently designated as a nonattainment area for state and federal ozone standards, the state PM 10 standard, and the state and federal PM 2.5 standard. The District has adopted an Ozone Attainment Plan and a Clean Air Plan in compliance with Federal and State Clean Air Acts. These plans include measures to achieve compliance with both ozone standards. The plans deal primarily with emissions of ozone precursors (nitrogen oxides (NO_x) and volatile organic compounds, also referred to as Reactive Organic Gases (ROG)).

The project would create three parcels and enable construction of three single-family homes. As described in Sections 3.b and 8.a below, the proposed project would not result in a significant impact related to air quality or greenhouse gas emissions. Additionally, as described below, the project would implement conditions and measures to reduce air quality emissions during construction. The proposed

project would not hinder or disrupt implementation of any control measures from the Clean Air Plan. Implementation of the proposed project would result in a less-than-significant impact related to implementation of an applicable air quality plan.

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:

As described in the BAAQMD CEQA Guidelines, the BAAQMD has developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether the proposed project could result in potentially significant air quality impacts. If all of the screening criteria are met by a proposed project, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions.

If the project meets the screening criteria in Table 3-1 (Operational-Related Criteria Air Pollutant and Precursor Screening Level Sizes) of the BAAQMD CEQA Guidelines, the project will not result in the generation of operational-related criteria air pollutants and/or precursors that exceed the Thresholds of Significance shown in Table 2-2 of the BAAQMD CEQA Guidelines. Additionally, operation of the proposed project would also result in a less-than-significant cumulative impact to air quality from criteria air pollutant and precursor emissions.

Based on its size, the proposed project is below the single-family land use construction-related screening size (114 dwelling units) and the operation criteria pollutant screening size (325 dwelling units). Following use of the screening criteria for ROG and NOx, found in the BAAQMD Air Quality Guidelines (Table 3-1), a detailed air quality study is not required, and emissions of criteria pollutants from the project would be less than significant. Furthermore, as the project would not result in a significant air quality impact, it would not result in a cumulatively considerable contribution to regional air quality impacts.

The project would not have a cumulative effect on ozone because it would not generate substantial traffic, which would result in substantial emissions of ozone precursors (ROG and NOx). The project would have no long-term effect on PM2.5 and PM10, because all surfaces would be paved gravel, landscaped or otherwise treated to stabilize bare soils, and dust generation would be minimal. However, there could be a significant short-term emission of dust (which would include PM2.5 and PM10) during construction. Mitigation Measure AIR-1 would reduce this potential impact to a less than significant level.

Although the project would generate some ozone precursors from new vehicle trips, the size of the project is small, and the project would not have a cumulative effect on ozone because it will not generate substantial traffic resulting in significant new emissions of ozone precursors (ROG and NOx).

Wood smoke from fireplaces and wood stoves are sources of fine particulate matter. Wood smoke is a major contributor to reduced visibility and reduced air quality on winter evenings in both urban and rural areas. Sonoma County building regulations limit fireplaces to natural gas fireplaces, pellet stoves and EPA-Certified wood burning fireplaces or stoves. With the restriction on fireplace design, fine particulate emissions from this project would be a less than significant impact.

Construction activities would generate dust, particulates, and emissions from construction related vehicles, resulting in potential cumulative impacts. However, Mitigation Measure AIR-1 below would address these impacts.

Significance Level:

Less than Significant Impact with Mitigation Incorporated

Mitigation Measure AIR-1:

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

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

In addition, the following BAAQMD BMPs shall be included in the project:

- a. Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) two times per day during construction to limit visible dust emissions.
- b. Cover all haul trucks transporting soil, sand, or other loose materials off the project site.
- c. Vehicle speeds on unpaved roads/areas shall not exceed 15 miles per hour.
- d. Complete all areas to be paved as soon as possible and lay building pads as soon as possible after grading unless seeding or soil binders are used.
- e. Minimize idling time of diesel-power construction equipment to five minutes and post signs reminding workers of this idling restriction at all access points and equipment staging areas during construction of the proposed project.
- f. Maintain and properly tune all construction equipment in accordance with manufacturer's specifications and have a CARB-certified visible emissions evaluator check equipment prior to use at the site.
- g. Post a publicly visible sign with the name and telephone number of the construction contractor and County staff person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The publicly visible sign shall also include the contact phone number for the BAAQMD to ensure compliance with applicable regulations.

Mitigation Monitoring AIR-1:

Permit Sonoma Project Review staff shall ensure that these construction period air quality measures are listed on all site alteration, grading, building, or improvement plans prior to issuance or grading or building permits. With implementation of the above mitigation measure, the proposed project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation.

c) Expose sensitive receptors to substantial pollutant concentrations?Comment:

Sensitive receptors include hospitals, schools, convalescent facilities, and residential areas. The project site is located in an area with rural residential and agricultural uses. As described above in section 3.b, due to the limited size of the project (a three-parcel subdivision with the intent of construction and occupation of three single-family homes), the project would not contribute to a significant impact related to construction or operational air quality impacts.

Although there would be no long-term increase in emissions, during construction there could be significant short-term dust emissions that would affect nearby residents. Dust emissions would be reduced to a less than significant level by the mitigation measure described in item 3.b above.

Significance Level:

Less than Significant Impact

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

Comment:

The project is not an odor generating use, nor located near an odor-generating source that may affect the use and would have no odor impact. Construction equipment may generate odors during project construction. The impact would be less than significant as it would be a short-term impact that ceases upon completion of the project.

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:

A Biological Resources Assessment was prepared by Ms. Lucy Macmillan, M.S., on behalf of the applicant's representative Mr. A.J. Tudisco. The assessment, dated September 21, 2021, involved a study for the potential of special status species occurrences on-site and on the immediate vicinity. Due to the lack of surface water on-site, it is not suitable for most of the species listed to be found within a 5-mile radius of the site. The special status species identified that could be present at the site are those such as bird and bats due to the trees on-site. Mitigation measures below will help the project having a less than significant impact on this topic.

Significance Level:

Less than Significant Impact with Mitigation Incorporated

Mitigation Measure BIO-1:

Guidelines to prevent significant impact on potential nesting birds in the project area.

- a. If initial ground disturbance or vegetation removal occurs during the breeding season (February 1 through August 31), a qualified biologist will conduct a breeding bird survey no more than 7 days prior to these activities, to determine if any birds are nesting in trees in the area.
- b. If active nests are found close enough to the proposed activities to affect breeding success, the biologist will establish an appropriate exclusion zone around the nest. This exclusion zone may be modified depending upon the species, nest location, and existing visual buffers. Once all youngling have become independent of the nest, vegetation removal and grading may take place in the former exclusion zone.
- c. If initial ground disturbance is delayed or there is a break in project activities of greater than 7 days within the bird-nesting season, then a follow-up nesting bird survey should be performed to ensure no nests have been established in the interim.

Mitigation Monitoring BIO-1:

Permit Sonoma Project Review staff will not authorize issuance of grading or building permits until a pre-construction survey from a qualified biologist is submitted. Photo documentation shall be

provided to Permit Sonoma Project Review staff, demonstrating ground disturbance and vegetation removal has started within 7 days of the date of survey.

Mitigation Measure BIO-2:

Guidelines to prevent significant impact on potential maternity roosting bats in the project area.

- a. If initial ground disturbance occurs during the bat maternity roosting season (May 1 through August 31), a qualified biologist will conduct a bat roost assessment of trees within 100 feet of the intended ground disturbance area.
- b. If the biologist determines there is a potential for maternity roosting bats to be present within 100 feet of the intended ground disturbance area, nighttime emergence surveys should be performed to determine if maternity roosting bats are present.
- c. If bat maternity roosts are present, the biologist will establish appropriate exclusion zones around all maternity roost areas.

Mitigation Monitoring BIO-2:

Same as Mitigation Monitoring BIO-1.

- 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:

A riparian corridor originated at the Arroyo Seco creek has been identified across Old Winery Road from the project site. Per the Zoning Code, development within 100 feet of the top of bank of Arroyo Seco at this location would require further examination and mitigation measures. However, the project site is further than 100 feet from the top of bank, and therefore no further analysis of the potential project impact on the riparian corridor is required.

It is estimated that 14 trees will need to be removed to accommodate the subdivision's driveway, of which at least 6 are not considered to be protected trees, per the County's Tree Ordinance arboreal value table. It is also estimated that a minimal amount of adult trees will need to be replaced in order to build residences in the future. The applicant understands the value and benefits of keeping trees on-site, and will try and develop future residences around the large trees and replant on-site those that need to be moved.

Additionally, among vegetation communities of value to the County of Sonoma, is the Coast Live Oak Woodlands. Although some oaks are identified to be on-site (Macmillan report) and may be affected by the project, these are not considered to be a sensitive natural community, per calculations following California's Department of Fish and Wildlife's CaCode document.

Vegetation Alliance	California Natural Community	Sensitive Habitat	Acres	Percent Cover
Total Acres	Code	Y/N	6.34	
Annual Grassland	42.027.200	N	4.23	66.72%
Coast Live oak woodland	71.060.02	N	1.58	24.92%
Eucalyptus grove	79.100.00	N	0.36	5.68%
Arundo and Tamarisk	invasive	invasive	0.034	0.54%

stands				
Developed	n/a	n/a	0.14	2.21%

Significance Level:

Less than Significant Impact with Mitigation Incorporated

Mitigation Measure BIO-3:

Guidelines to compensate for the loss of protected trees.

NOTE ON MAP:

"The proposed project shall be required to adhere to all general provisions, tree protection methods during construction, and compensatory mitigation requirements of the Sonoma County Tree Protection Ordinance (Sonoma County Code of Ordinances, Chapter 26, Article 88, Sec. 26-88-010 [m]). The applicant is required to plant replacement trees or prepare and/or issue payment of in-lieu fees that may be used to acquire and protect stands of native trees in preserves or place trees on public lands. Furthermore, only the minimum amount of vegetation shall be pruned or removed that is necessary to construct the project. Where possible, vegetation shall be tied back in-lieu of cutting. Native vegetation that must be removed shall be cut at or above grade to facilitate re-growth. Any pruning that is done, including for utility line clearance, shall conform to the *American National Standard for Tree Care Operation Tree, Shrub, and Other Woody Plant Maintenance Standard Practices, Pruning (ANSI A300 Part 1)-2008 Pruning*, and the companion publication *Best Management Practices: Tree Pruning (ISA 2008)*. Roots shall only be unearthed when necessary."

Mitigation Monitoring BIO-3:

Prior to the issuance of any grading permit, the County shall review and approve the applicant's demonstration of compliance with all provisions of the Sonoma County Tree Protection Ordinance.

- 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:

There are no wetlands on-site or the near vicinity of the site, therefore the project would have no impact on this area.

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:

As mentioned in Section 4.a above, due to the lack of surface water sources on-site and the immediate vicinity, it is unlikely for sensitive wild animal species to live on this site. However, there is the potential for sensitive birds and/or bats to temporarily inhabit trees on the project site during nesting and roosting season. Mitigation measures BIO-1 and BIO-2 will reduce impact on native wildlife nursery sites at a less than significant level. In regards to the likelihood for this project to have an impact on fish or other migrating species is unlikely, due to the public road adjacent to the west and the developed lots to the other sides of the project site.

Significance Level:

Less than Significant with Mitigation Incorporated

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

Comment:

With implementation of Mitigation Measures BIO-1 through BIO-3, the project would be consistent with Sonoma County General Plan 2020 Land Use Element and Open Space & Resource Conservation Element goals, policies, and objectives to protect natural resources and lands including, but not limited to, watershed, fish and wildlife habitat, biotic areas, and habitat connectivity corridors.

The project is located within a Riparian Corridor Combining Zone with 100/25 setbacks (RC 100/25) due to its close proximity to a creek known as *Arroyo Seco*; however and as mentioned in Section 4.b above, the project site is proven to be located further than 100 feet from the top-of-bank of the creek. The project is consistent with the guidelines for Riparian Corridor Combining Zones, and would have no impact.

The project is also located within a Valley Oak Habitat Combining District (VOH). Project implementation would be consistent with the County's policies for projects located in the VOH district. The project site does contain oak woodland and native trees protected under the Sonoma County Tree Ordinance (Sonoma County Municipal Code Chapter 26). It is estimated that fourteen trees would be removed as part of the project, including valley oaks. The VOH Combining District permits the removal of valley oaks within the District with uniformly applied mitigation requirements (Section 26-67-030). The Sonoma County Tree Protection Ordinance allows the following forms of mitigation for tree removal: (1) on-site planting, (2) payment of an in-lieu fee, or (3) analysis of arboreal value comparative to remaining trees. Implementation of mitigation measure BIO-4 would reduce impacts from removal of protected trees and valley oaks to a less-than-significant level.

Significance Level:

Less than Significant Impact with Mitigation Incorporated

Mitigation Measures BIO-1 through BIO-3.

Mitigation Monitoring BIO-1 through BIO-3.

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:

Habitat Conservation Plans and natural community conservation plans are site-specific plans to address effects on sensitive species of plants and animals. The project site is not located in an area subject to a habitat conservation plan or natural community conservation plan.

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:

Upon approval of the subdivision, it is the intent of the applicants to demolish the existing residence and sheds on site, in order to make space for new residential structures. A Historic Resource

Evaluation was performed on the structures on-site, and provided to staff for their review. The study, prepared by Historic Preservation Planner Alice P. Duffee and dated September 2021, indicates neither of the structures qualify as historic resources under CEQA. The residence and a shed are not old enough to qualify, as they were built on 1966 and 2000 respectively; and the other shed “the tank house” has lost physical integrity. Permit Sonoma Project Review staff agree with the findings of the study and, therefore, the project would not have an impact on historic resources as defined in §15064.5.

Significance Level:

No Impact

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

Comment:

The subdivision proposes disturbance of native soils in order to accommodate a driveway, and it enables the possibility of development of more houses in the future.

On October 23, 2020, Permit Sonoma staff referred the project application to Native American Tribes within Sonoma County to request consultation under AB-52. On November 24, 2020, a representative for the Federated Indians of Graton Rancheria requested a cultural report of the site to be prepared and provided to them for their review. A Cultural Resources Study dated May 18, 2021, was performed by Taylor Alshuthm, BA and Tom Origer, MA/RPA. The study was routed to Graton Rancheria for their review on May 19, 2021. Consultation with Graton Rancheria concluded on June 23, 2021, when both parties agreed to construction monitoring Mitigation Measure TCR-1, which is also included as a Condition of Approval of the project.

Significance Level:

Less than Significant Impact with Mitigation Incorporated (See Section 18. Tribal Cultural Resources below).

Mitigation Measure TCR-1 (See Section 18 below).

Mitigation Monitoring TCR-1.

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

Comment:

According to the Cultural Resources Study and outcome from the Tribal Referral, no cemeteries or burial sites have been identified on the project site. The site would be disturbed by grading and construction activities. While the potential for the discovery of human remains during ground disturbing activities was determined unlikely, implementation of Mitigation Measure TCR-1 would reduce potential impacts to less than significant.

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

Significance Level:

Less than Significant Impact with Mitigation Incorporated

Mitigation Measure TCR-1.

Mitigation Monitoring TCR-1.

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:

As the project would include the subdivision of the project site into three parcels, and the eventual development of three single-family homes, the proposed project would increase electricity and natural gas consumption. In accordance with California Energy Code Title 24, the proposed project would not use energy in a wasteful manner. Minimum efficiency standards for household appliances, water and space heating and cooling equipment and insulation for doors, pipes, walls and ceilings would ensure that the proposed project would not use energy in a wasteful manner.

Significance Level:

Less than Significant Impact

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

Comment:

Construction of the proposed project, due to its scale, would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Significance Level:

No Impact

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.

Significance Level:

No 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. Based on this uniformly applied regulatory process, the project would not expose people to substantial risk of injury.

Significance Level:

Less than Significant Impact

iii. Seismic-related ground failure, including liquefaction?

Comment:

Strong ground shaking can result in liquefaction, the sudden loss of shear strength in saturated sandy material, resulting ground failure. Areas of Sonoma County most at risk of liquefaction are along San Pablo Bay and in alluvial valleys. The site is not within a liquefaction hazard area and, therefore, there is no significant impact.

Significance Level:

Less than Significant Impact

iv. Landslides?

Comment:

Steep slopes characterize much of Sonoma County, particularly the northern and eastern portion of the County. Where these areas are underlain by weak or unconsolidated earth materials landslides are a hazard. The site is not located within a deep-seated landslide hazard area, based on Figure PS-1d from the Public Safety Element of the Sonoma County General Plan.

Significance Level:

Less than Significant Impact

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

Comment:

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

Erosion and sediment control provisions of the Drainage and Storm Water Management Ordinance (Chapter 11, Sonoma County Code) and Building Ordinance (Chapter 7, Sonoma County Code) requires implementation of flow control best management practices to reduce runoff. The Ordinance requires treatment of runoff from the two year storm event. Required inspection by Permit Sonoma staff insures that all grading and erosion control measures are constructed according to the approved plans. These ordinance requirements and adopted best management practices are specifically designed to maintain potential water quantity impacts at a less than significant level during and post construction.

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

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

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

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 would be subject to seismic shaking and other geologic hazards as described in section 7.a.ii above. However, as described in that section, standard County Code and State Building Code requirements (all of which shall be required as conditions of approval for the project), would reduce potential soil stability impacts to less than significant.

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:

Table 18-1-B of the Uniform Building Code is an index of the relative expansive characteristics of soil as determined through laboratory testing. For the proposed project, soils at the site have not been tested for their expansive characteristics. No substantial risks to life or property would be created from soil expansion at the proposed project, even if it were to be affected by expansive soils through the practice of construction standards under the CBC.

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 could support a septic system and the required expansion area. Permitting by Permit Sonoma Well & Septic would be required for new septic systems to be installed and connected to new residences in the new lots.

Significance Level:

No Impact

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

Comment:

As mentioned in section 5 above, a Cultural Resources Survey was prepared for the project and no paleontological resources were found. Mitigation Measure TCR-1 would reduce the impact of construction activities on unknown paleontological resources to a less than significant level by prescribing the necessary handling and notification procedures in case of the accidental discovery of unanticipated buried resources.

Significance Level:

Less than Significant Impact with Mitigation Incorporated

Mitigation Measure TCR-1.

Mitigation Monitoring TCR-1.

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:

Construction activities, such as site preparation and site grading, and motor vehicles transporting equipment, materials, and the construction crew would produce combustion emissions. During construction of the project, greenhouse gas emissions (GHGs) would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The BAAQMD does not have a quantitative threshold of significance for construction related GHG emissions.

The Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines provides suggestions for screening potential air quality impacts for different land uses. The Air District developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether the proposed project could result in potentially significant air quality impacts. If all of the screening criteria are met by a proposed project, then the lead agency or the applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. Projects below the applicable screening criteria shown in Table 3-1 of the BAAQMD CEQA Guidelines would not exceed the 1,100 MT of CO₂e/year GHG threshold of significance for projects other than permitted stationary sources.

Based on its size, the proposed project is below the operational GHG single-family screening size (56 dwelling units). Given this, the project would not be anticipated to generate significant GHG emissions; this impact would be considered less than significant.

Significance Level:

Less than Significant Impact

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

Comment:

The County does not have an adopted Climate Action Plan but has established GHG reduction goals and 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 resolution includes the following goals:

- Increase building energy efficiency
- Increase renewable energy use
- Switch equipment from fossil fuel to electricity
- Reduce travel demand through focused growth
- Encourage a shift toward low-carbon transportation options
- Increase vehicle and equipment fuel efficiency
- Encourage a shift toward low-carbon fuels in vehicles and equipment
- Reduce idling
- Increase solid waste diversion
- Increase capture and use of methane from landfills
- Reduce water consumption
- Increase recycled water and graywater use
- Increase water and waste-water infrastructure efficiency
- Increase use of renewable energy in water and wastewater systems
- Reduce emissions from livestock operations
- Reduce emissions from fertilizer use
- Protect and enhance the value of open and working lands
- Promote sustainable agriculture
- Increase carbon sequestration
- Reduce emissions from the consumption of goods and services

In addition, Sonoma County has the goal of increasing resilience by pursuing local actions that support the following goals:

- Promote healthy, safe communities
- Protect water resources
- Promote as sustainable, climate-resilient economy
- Mainstream the use of climate projections

The project, by implementing current county codes would be consistent with local or state plans, policies, or regulations adopted for the purpose of reducing emissions of greenhouse gases.

Significance Level:

Less than Significant Impact

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 is proposing to subdivide land into three parcels and develop a driveway, with the intent to also develop three single-family homes in the future. The property is currently developed with three residential structures, which would be demolished after approval. During construction and operation at the project site, small amounts of potentially hazardous materials would likely be used on this project such as fuel, lubricants, and cleaning materials. Proper use of materials in accordance with local, state, and federal requirements, and as required in the construction documents, would minimize the potential for accidental releases or emissions from hazardous materials. In addition, as standard County procedure, project construction contracts would be required to comply with Sonoma County Fire Code regulations for storage of flammable liquids and Sonoma County Municipal Code regulations related to hazardous materials management (protection of surface waters pursuant to Caltrans Standard Specifications, or functional equivalent). Project construction contracts would also be required to specify procedures in the event of a spill of hazardous materials (i.e., Contractor responsible for immediately calling emergency number 9-1-1 to report spill, taking appropriate actions to contain spill to prevent further migration of hazardous materials, contacting County to verify appropriate clean-up procedures). With existing General Plan policies and Federal, State, and Local Regulation and oversight of hazardous materials, the potential threat to public health and safety for the environment from hazardous materials transport, use or disposal would represent a less-than-significant impact.

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:

See Section 9.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 located within one-quarter mile of an existing or proposed school. The nearest school is Montessori School of Sonoma, approximately 1 mile from the project site.

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:

There are no known hazardous materials sites within or adjacent to the project limits, based on a review of the following databases on December 30, 2021.

1. The State Water Resources Control Board Geotracker database,
2. The Department of Toxic Substances Control EnviroStor database (formerly known as CalSites), and
3. The California Integrated Waste Management Board Solid Waste Information System (SWIS).

Significance Level:

No Impact

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

Comment:

The project site is not within two miles of a public airport or public use airport and is not within the Airport Referral Area as designated by the Sonoma County Comprehensive Airport Land Use Plan.

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 outside the area. See section 17, Transportation and Traffic, for discussion of emergency access.

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:

According to the Sonoma County General Plan (Figure PS-1g, Wildland Fire Hazard Areas), the proposed project area is located within a Local Responsibility Area (LRA), and therefore is not within a fire hazard severity zone. The Schell-Vista Fire Protection District would serve the newly created lots.

Permit Sonoma Fire Prevention Division reviewed the project as part of the referral process and provided standard conditions of approval.

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 proposed project is a three-lot subdivision that would result in grading of a ± 19,000 sq. ft. driveway, with further development of residential structures in the future. The proposed new impervious surface could affect the quantity and/or quality of storm water run-off.

The project site is located in the San Pablo Bay watershed, in the Napa-Sonoma Valley basin. The Sonoma Creek is listed by both the State and North Coast Resource Water Quality Control Boards under the Clean Water Act as impaired for sediment, nutrients, pathogens and temperature (General Plan, WR-14).

The Arroyo Seco creek is approximately 150 feet from the site and the nearest proposed new impervious surface (the driveway). However, there are no blue line streams located on the property, and the driveway will be graded towards new bio-retention planters to serve as swales to filtrate any particles running off the driveway. There are no wetlands on site of its near vicinity and, therefore, no impacts to wetlands or riparian areas would occur.

A Stormwater Management Plan Narrative has been prepared by the applicants and was reviewed by Permit Sonoma Grading and Storm Water division (GSW) as part of the project referral process. GSW approved the document and provided standard conditions of approval for the project. Following subdivision approval and at the time of proposed construction, the applicant/operator will be required to submit a grading permit application and will go through the standard review process to ensure conformance with the Grading and Drainage Ordinance (Chapter 11) and Storm Water Quality Ordinance (Chapter 11a) of the Sonoma County Code and the Sonoma County Storm Water Low Impact Development Guide, all of which set performance standards and Best Management Practices for pre-construction, construction, and post-construction to prevent and/or minimize the discharge of pollutants, including sediment, from the project site.

Significance Level:

Less than Significant 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 parcel is in groundwater areas classified as 1 (major groundwater basin) and 3 (marginal groundwater availability). The project parcel is located in the Napa-Sonoma Valley priority groundwater basin. Sonoma County General Plan Policy WR-2e requires groundwater studies that demonstrate adequate groundwater supply for projects in Class 3 and 4 areas. A hydrogeologic report titled "Net Zero Water Budget for Proposed Subdivision, 19190 Old Winery Road (APN 127-191-012)" dated August 4, 2021 was prepared for the project by O'Connor Environmental, Inc. (OEI).

In the report, OEI identifies the current annual water demand of the 6.32-acre parcel to be of 0.5 acre-feet, with 0.2 acre-feet for domestic use and 0.3 acre-feet for unspecified landscape irrigation.

OEI mentions in their proposed water budget to limit each of the 3 new parcels to only one single-family residence and no ADUs, all landscaping to meet xeriscape standards (which require minimal irrigation), roof-top runoff collection and tank storage, and Low Impact Design (LID) to collect and retain on-site all runoff from hardscapes (seen in the tentative map as bio-retention planters and grade). All these calculations provide an estimated increase in water use from the current 0.5 acre-feet to somewhere between 0.51 acre-feet to 0.6 acre-feet.

The OEI report was reviewed by Permit Sonoma's Geologist Robert Pennington and was deemed consistent with General Plan Policy WR-2e and County guidelines. Due to the project site location within a priority groundwater basin, Pennington recommended conditions of approval including proof of adequate water yield to be demonstrated prior to recordation of the map and notes on map to help prevent excessive water consumption at the new parcels. The notes on map include those measures identified in the OEI report, as well additional ones provided by Pennington, which are also mitigation measures for this project. Permit Sonoma will, further reinforce the condition of approval accounted for as Mitigation Measure HYDRO-1, by designating the project site within the Accessory Dwelling Unit Exclusion Combining District (Z) through a technical correction, to inform staff and applicants understanding of the restriction while navigating departmental tools such as zoning maps.

On December 6, 2021, the Sonoma Valley Groundwater Sustainability Agency (GSA) board approved a Groundwater Sustainability Plan (GSP) for the Sonoma Valley sub-basin. The plan was created under the mandate from the California's Sustainable Groundwater Management Act (SGMA). The GSP lays out a management process for ensuring sustainable groundwater supply in the future by improving the understanding of this resource, measuring progress through metrics that will be monitored, actively implementing projects, adopting policies and management actions in response to groundwater

conditions if they decline unacceptably, and developing the funding needed for long-term implementation.

SGMA requires GSAs to evaluate groundwater conditions using six indicators of groundwater sustainability: groundwater levels, groundwater in storage, groundwater quality, land subsidence, seawater intrusion, and interconnected surface water. Of the six indicators, declining groundwater levels in portions of the basin are of greatest concern to the basin, and potentially applicable to the project.

Groundwater Levels: Groundwater levels for the majority of shallow aquifer monitoring wells are generally stable and predominantly above sea level. There are two persistent groundwater-pumping depressions in the deep aquifer system in southern Sonoma Valley. Southeast of the City of Sonoma (and primarily east of the Eastside Fault), measured groundwater levels are as deep as 126 feet below mean sea level (msl) and southwest of El Verano groundwater levels are as deep as 28 feet below msl in the deep aquifer system. Declining groundwater levels have persisted and expanded in some portions of these areas. Most of these chronic declines are considered likely to have resulted from increased local groundwater extraction.

The minor subdivision incorporates water conservation tools such as a 1-residence limit per parcel, xeriscape landscaping, storm water retention and storage, among others. With required water conservation measures, the project is not expected to increase net groundwater use relative existing baseline conditions. Therefore, the project is not expected to decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Significance Level:

Less than Significant Impact with Mitigation Incorporated

Mitigation Measure HYDRO-1:

NOTE ON MAP:

“Each of the resulting lots shall be limited to one single-family residence. No accessory dwelling units (ADUs) shall be allowed due to groundwater availability at this priority groundwater basin.”

Mitigation Measure HYDRO-2:

NOTE ON MAP:

“Prior to issuance of any grading or building permit on each lot, WELO compliant landscape plans specifying very low water use (example: xeriscape design) shall be submitted and approved by PRMD Natural Resources. Once plants are established, total annual irrigation demand shall not exceed 10,000 gallons per year. All landscape irrigation water shall be provided by captured rainwater and/or graywater. Groundwater shall not be used for landscape irrigation.”

Mitigation Measure HYDRO-3:

NOTE ON MAP:

“Prior to issuance of any grading or building permit on each lot, a rainwater capture system plan shall be submitted and approved by PRMD Well and Septic. The rainwater capture system shall route a minimum of 50% of roof area to storage tanks. Storage tanks for rainwater capture shall have a minimum volume of 10,000 gallons.”

Mitigation Measure HYDRO-4:

NOTE ON MAP:

“Prior to issuance of any building permit involving plumbing on each lot, plumbing plans specifying future graywater use shall be submitted and approved by PRMD Well and Septic. Graywater from all laundry, baths, showers, and HVAC condensate shall flow through dual drainage plumbing to a

pre-determined access point where a future diverter valve could be installed without requiring re-plumbing of the drain pipes.”

Mitigation Measure HYDRO-5:

NOTE ON MAP:

“No pool or spa with a capacity greater than 600 gallons shall be approved or installed.”

Mitigation Measure HYDRO-6:

NOTE ON MAP:

“Prior to occupancy, all landscaping and irrigation shall be installed according to approved plans. Verification of installation from the landscape architect or qualified irrigation specialist is required.”

Mitigation Measure HYDRO-7:

NOTE ON MAP:

“Prior to occupancy, the rainwater capture system shall be installed according to approved plans. Verification of installation by PRMD staff or representative is required.”

Mitigation Measure HYDRO-8:

NOTE ON MAP:

“Prior to occupancy, graywater dual drainage plumbing shall be installed according to approved plans. Verification of installation by PRMD staff or representative is required.”

Mitigation Monitoring HYDRO-1 through HYDRO-8:

Permit Sonoma Project Review staff shall not provide clearance for recordation of the final map unless the notes mentioned in these mitigation measures are included.

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:

County adopted grading standards and best management practices (such as silt fencing, straw wattles, construction entrances to control soil discharges, primary and secondary containment areas for petroleum products, paints, lime and other materials of concern, etc.), mandated limitations on work in wet weather, and standard County grading inspection requirements, are specifically designed to maintain potential water quality impacts at a less than significant level during project construction. Therefore, construction activities associated with the proposed project are not anticipated to alter the existing drainage pattern of the site or area in a way that would result in downstream erosion and/or sedimentation. All construction activities are required to adhere to Sonoma County Code Sections 11-14-040 requiring that BMPs be incorporated in project activity to control surface water runoff.

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 parcel is not in the 100-year flood zone based on the online Sonoma County GIS tool. According to FEMA, the project is not within a Special Flood Hazard Area (SFHA), which is an "area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year." These areas are also depicted on the zoning maps with the F1 (Flood Zone) and F2 (Flood Plain) combining zones (General Plan 2020 PS-1e). Because the project site is not within a 100-year floodplain and there is no other potential source of flood water in the project vicinity, the project would not result in onsite or offsite flooding.

Significance Level:

Less than Significant 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; or**

Comment:

Storm water treatment BMPs will address potential for water quality impacts and shall address water quantity through storm water flow control BMPs. Storm water treatment BMPs shall be designed to treat storm events and associated runoff to the 85-percentile storm event, in accordance with County standards. Storm water treatment BMPs shall be designed to treat storm events and associated runoff to the channel forming discharge storm event, which is commonly referred to as the two-year 24-hour storm event.

Significance Level:

Less than Significant Impact

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

Comment:

The site does not contain any stream, nor the proposed development would redirect flood flows.

Significance Level:

Less than Significant Impact

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

Comment:

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

Significance Level:

No Impact

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

Comment:

Storm water treatment Best Management Practices (BMPs) will address potential for water quality impacts and shall also address water quantity through storm water flow control Best Management Practices. Storm water treatment Best Management Practices shall be designed to treat storm events and associated runoff to the 85 percentile storm event in accordance with County Standards. Storm water treatment Best Management Practices shall be designed to treat storm events and associated

runoff to the channel forming discharge storm event, which is commonly referred to as the two year 24 hour storm event.

The location of the storm water Best Management Practices are site specific and depend on details of future development. The type and approximate size of the selected storm water Best Management Practices are in accordance with the adopted Sonoma County Best Management Practice Guide. The preliminary report and conceptual plan has been reviewed and approved by the Grading & Storm Water Section of Permit Sonoma, with conditions added as needed.

The GSP identifies conceptual projects and management actions that help avoid chronic lowering of groundwater levels. Projects include voluntary water conservation programs, implementation and expansion of recycled water projects, enhanced groundwater recharge projects, development of additional policy options, and coordination of farm plan with GSP implementation.

This project does not obstruct any GSP projects. Water conservation measures such as a 1-residence limit per parcel, xeriscape landscaping, stormwater retention and storage, among others, are in general alignment with the GSP's recommendations and future for water conservation and enhanced groundwater recharge.

At the time of submitting of a grading, drainage, or building permit application, a final drainage report for each parcel must be submitted for review. A typical drainage report would include a project narrative, on- and off-site hydrology maps, hydrologic calculations, hydraulic calculations, pre- and post-development analysis for all existing and proposed drainage facilities. The drainage report shall abide by and contain all applicable items in the Drainage Report Required Contents (DRN-006) handout.

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 physical structure (such as a major transportation facility) or removal of a primary access route (such as a road or bridge) that would impair mobility within an established community or between a community and outlying areas.

Significance Level:

No Impact

b) 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 project would not conflict with any applicable land use plan adopted for the purpose of avoiding or mitigating environmental effect, including the Sonoma County General Plan and Zoning Ordinance.

The General Plan Land Use designation for the parcel is Rural Residential with a 2-acre density. The Zoning designation is also Rural Residential. The minimum lot size at locations such as the project site where no public water or sewer are available is 1.5 acres. The proposed project would be consistent with the residential densities and lot size requirements established for the Rural Residential zone.

The project would be consistent with the following goals, policies, and objectives in the Sonoma County General Plan:

- Rural Residential Policy (General Plan Land Use Section 2.2)
- Wastewater (General Plan Policy LU0-8a): The project would comply with regional waste discharge requirements and County regulations to minimize storm water, surface water and groundwater pollution.
- Protection of Water Resources (General Plan Goal LU-8, Objective LU-8.1, Goal, Policy LU8a): The project would be consistent with regulations pertaining to protecting Sonoma County's water resources and would also be largely consistent with regulations designed to avoid long term declines in available groundwater resources or water quality.
- Noise (General Plan Goal NE-1): Project construction and operations would not exceed the general plan noise standards Table NE-2 (See Section 12, Noise, for further discussion).
- Vacation Rental Exclusion Combining District (X): No vacation rentals are proposed under this project.

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

Significance Level:

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). Sonoma County has adopted the Aggregate Resources Management Plan that identifies aggregate resources of statewide or regional significance (areas classified as MRZ-2 by the State Geologist). Consult California Geologic Survey Special Report 205, Update of Mineral Land Classification: Aggregate Materials in the North San Francisco Bay Production-consumption region, Sonoma, Napa, Marin, and Southwestern Solano Counties, California (California Geological Survey, 2013).

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 result in:

- 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:

The proposed subdivision and paved driveway to be used in the future for access to three residential lots, would generate noise levels similar to or less than the current noise levels at the residential area. No substantial permanent increase in ambient noise levels near the project is anticipated with the potential future of a site with three single-family homes.

Short-term construction activities would periodically increase ambient noise levels at the project site and vicinity but would subside once construction is completed. Mitigation Measure NOISE-1 would reduce construction period noise impacts to a less than significant level.

Significance Level:

Less than Significant Impact with Mitigation Incorporated

Mitigation Measure NOISE-1:

Construction activities for this project shall be restricted as follows:

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

- a. All internal combustion engines used during construction of this project will be operated with mufflers that meet the requirements of the State Resources Code, and, where applicable, the Vehicle Code. Equipment shall be properly maintained and turned off when not in use.
- b. Except for actions taken to prevent an emergency, or to deal with an existing emergency, all construction activities shall be restricted to the hours of 7:00 a.m. and 7:00 p.m. on weekdays and 9:00 a.m. and 7:00 p.m. on weekends and holidays. If work outside the times specified above becomes necessary, the applicant shall notify Permit Sonoma Project Review staff as soon as practical.
- c. There will be no startup of machines nor equipment prior to 7:00 a.m., Monday through Friday or 9:00 am on weekends and holidays; no delivery of materials or equipment prior to 7:00 a.m. nor past 7:00 p.m., Monday through Friday or prior to 9:00 a.m. nor past 7:00 p.m. on weekends and holidays and no servicing of equipment past 7:00 p.m., Monday through Friday, or weekends and holidays. A sign shall be posted on the site regarding the allowable hours of construction, and including the developer- and contractors mobile phone number for public contact 24 hours a day or during the hours outside of the restricted hours.
- d. Pile driving activities shall be limited to 7:30 a.m. to 7:00 p.m. weekdays only.
- e. Construction maintenance, storage and staging areas for construction equipment shall avoid proximity to residential areas to the maximum extent practicable. Stationary construction equipment, such as compressors, mixers, etc., shall be placed away from residential areas and/or provided with acoustical shielding. Quiet construction equipment shall be used when possible.

- f. The developer shall designate a Project Manager with authority to implement the mitigation prior to issuance of a building/grading permit. The Project Manager's 24-hour mobile phone number shall be conspicuously posted at the construction site. The Project Manager shall determine the cause of noise complaints (e.g. starting too early, faulty muffler, etc.) and shall take prompt action to correct the problem.

Mitigation Monitoring NOISE-1:

Permit Sonoma Project Review staff shall ensure that the measures are listed on all site alteration, grading, building or improvement plans, prior to issuance of grading or building permits. Permit Sonoma staff shall inspect the site prior to construction to assure that the signs are in place and the applicable phone numbers are correct. Permit Sonoma staff will investigate any noise complaints. If violations are found, Permit Sonoma shall seek voluntary compliance from the permit holder, or may require a noise consultant to evaluate the problem and recommend corrective actions, and thereafter may initiate an enforcement action and/or revocation or modification proceedings, as appropriate.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Comment:

The project includes construction activities that may generate minor groundborne vibration and noise. These levels would not be significant because they would be short-term and temporary, and would be limited to daytime hours. There are no other activities or uses associated with the project that would expose persons to or generate excessive ground borne vibration or ground borne noise levels.

Significance Level:

Less than Significant Impact

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

Significance Level:

No 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 proposed project would create a three-parcel subdivision. Considering three new single-family residences may be constructed on each new lots, these new residences would not represent a substantial amount of homes and therefore would not induce population growth. As a condition of approval, a zoning overlay would be placed on each of the lots restrict development of accessory dwelling units. The project is within the projected population growth of the county's General Plan and is consistent with the applicable land use designation (Rural Residential) and zoning classification (Rural Residential) for residential densities and development.

Significance Level:

Less than Significant 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 rations, response times or other performance objectives for any of the public services:**

Comment:

The project is located within a Local Responsibility Area (LRA), under Schell-Vista Fire Protection District jurisdiction. The local fire department would continue to serve this area in coordination with the Sonoma Fire District for fire protection and emergency response services. Existing fire protection facilities are anticipated to be adequate. The parcel is located about half-mile from Schell-Vista Fire Protection District's nearest fire station, ensuring a rapid response time in the event of an emergency.

The County Fire Marshal reviewed the project description and plans and provided conditions of approval to comply with the California Fire Code, adopted with local amendments in the Sonoma County Code Chapter 13 including fire protection methods related to emergency water supply, setbacks, fuel modification and defensible space, road naming, and road access.

When the residences are constructed, the property owners will contribute Sonoma Fire District's fire development impact fee to offset the impacts to the fire protection infrastructure and capital facilities required to support the emergency response for this project. Because none of the conditions and/or requirements requires construction of new or expanded fire protection/EMS facilities, project impacts on fire protection/EMS would be less than significant.

Significance Level:

Less than Significant Impact

- i. **Fire protection?**

Comment:

The Schell-Vista Fire Protection District will continue to serve this area. There will be no increased need for fire protection resulting from the subdivision.

As mentioned above, the project description was reviewed and accepted with conditions by Permit Sonoma Fire Prevention staff.

Sonoma County Code requires that all new development meet Fire Safe Standards (Chapter 13). The County Fire Marshal reviewed the project description and requires that the expansion comply

with Fire Safe Standards, including fire protection methods such as sprinklers in buildings, alarm systems, extinguishers, vegetation management, hazardous materials management and management of flammable or combustible liquids and gases. This is a standard condition of approval and required by county code and impacts would be less than significant.

Significance Level:

Less than Significant Impact

ii. Police?

Comment:

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

The proposed project would create part-time jobs for the construction work of the proposed minor subdivision (e.g., driveway construction, utility undergrounding, culvert expansion, etc.) and potential construction work for the existing residential structures demolition and future residences anticipated to be developed. The three future single-family houses would not constitute a substantial amount of new housing and would not induce substantial population growth. Existing police protection facilities would be adequate to serve the project and additional Sheriff's Department facilities would not be needed.

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. Although three future residences are anticipated as a result of the project, the number of school-aged children from these residences would not be substantially large enough to require the construction of new or altered schools.

Significance Level:

No Impact

iv. Parks?

Comment:

Construction of the project would not involve substantial adverse physical impacts associated with parks. The project would not alter or impede any existing or future park plans, as the project does not propose a substantial increase in housing or population.

In addition, Sonoma County Code Chapter 20 provides for payment of parkland mitigation fees from all new residential development to meet General Plan Objective OSRC-17.1: "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. Each of the three future residences would be individually responsible for paying the required park development fee.

Significance Level:

No Impact

v. Other public facilities?

Comment:

The project would not be served by public sewer or water facilities. Expansion or construction of

additional types of public facilities, such as community centers, libraries, or other municipal centers, is not anticipated as a result of the development of this project.

Significance Level:

No 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 allow for the future development of three single-family homes, which would not result in activities that would cause or accelerate substantial physical deterioration of parks or recreation facilities. Although these three future residences could increase visitation of neighborhood and regional park facilities, the increase would not be significant, and project impacts on existing neighborhood and regional parks or other recreational facilities would be minimal.

Significance Level:

Less than Significant 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 16.a. above.

Significance Level:

No 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:

A traffic study was not prepared for the project, however, the Trip Generation Rates from the 8th Edition ITE Trip Generation Report were used to estimate that 3 single-family homes would result in an average of 29 trips per day. The relatively small increase in average daily traffic per day because of the project would not result in a substantial increase in traffic.

Old Winery Road is a rural residential and agricultural road with no shoulders, fencing, or other physical separation from surroundings. Public Works reviewed the project description and plans on September 30, 2021, and offered standard conditions including paying a Traffic Mitigation Fee and construction of proper intersections of roads and driveways. Because the conditions are standard practice of the Department of Transportation and Public Works, the project would not conflict with an applicable plan, ordinance, or policy.

Pedestrian and Bicycle Facilities – Currently there are no designated bicycle facilities in the project vicinity. Development of the project and increased use of Old Winery Road and the extended access drive would not impede pedestrian access to sidewalks, public transit stations, or pedestrian circulation as there are no existing or planned pedestrian facilities on Old Winery Road and project traffic would be minimal. Therefore, pedestrian and bicycle facilities would not be impacted by the project.

Transit Stops – The project site vicinity is not served by any public transit. The closest bus/transit stop is located within the City of Sonoma, approximately 1.8 miles away from the project site at the Sonoma Plaza.

The project is not proposing a significant increase in traffic, and traffic resulting from the project would not be expected to substantially affect existing traffic operations. As discussed below in section 17.c, the applicant would be required by County Transportation and Public Works to ensure that the sightlines, road material, and width for both the existing and proposed driveways meet American Association of State Highway and Transportation Officials (AASHTO) and County design standards. Therefore, because project operations and design would not interfere with bicycle, pedestrian, or transit facilities, the proposed project would not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. In addition, the County would require the project, as a condition of approval, to pay a development fee (Traffic Mitigation Fee), per Chapter 26, Article 98 of the County Code.

Significance Level:

Less than Significant Impact

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

Comment:

Traffic impacts under CEQA have traditionally been assessed based on increases in intersection delay measured by Level of Service (LOS). However, with the passage of SB 743, transportation impacts under CEQA are now to be measured based on the vehicle miles traveled (VMT) generated by a project (effective July 1, 2020).

Sonoma County has not yet adopted a VMT standard, nor has the County adopted a policy or threshold of significance regarding VMT. As with other cities and counties throughout the state that have not established VMT standards and thresholds, the Governor's Office of Planning and Research (OPR) "Technical Advisory on Evaluating Transportation Impacts in CEQA" (2018) is used in the interim to determine if the project's VMT may or may not cause a transportation impact. According to the guidelines, the screening threshold indicates that projects that generate or attract fewer than 110 trips per day "generally may be assumed to cause a less-than-significant transportation impact."

As discussed earlier in Section 17.a, the proposed project is anticipated to generate approximately 29 average daily vehicle trips using the industry accepted standard generation rate methodology from the Institute of Transportation Engineers (ITE). Because the project is anticipated to generate an average daily trip count below the 110 average daily trip threshold, it is reasonable to conclude that the project will have a less-than-significant impact on VMT. Therefore, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

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 could occur during construction operations. This temporary construction-related impact will cease upon project completion, and the following mitigation

will reduce the impact to a level of insignificance.

Significance Level:

Less than Significant Impact with Mitigation Incorporated

Mitigation Measure TRANS-1:

Traffic safety guidelines compatible with Section 12 of the Caltrans Standard Specifications, "Construction Area Traffic Control Devices" shall be followed during construction. Project plans and specifications shall also require that adequate signing and other precautions for public safety be provided during project construction.

Mitigation Monitoring TRANS-1:

Permit Sonoma Project Review staff shall not provide clearance for grading permit issuance unless the notes mentioned in this mitigation measure are included.

d) Result in inadequate emergency access?

Comment:

Construction activities may result in traffic delays possibly slowing emergency response vehicles or restricting access to residences or nearby businesses. This is a short term construction related impact that will cease upon project completion. Mitigation Measure TRANS-1 mentioned above will help reduce this impact to a level of less than significant.

Significance Level:

Less than Significant Impact with Mitigation Incorporated

Mitigation Measure TRANS-1.

Mitigation Monitoring TRANS-1.

18. TRIBAL CULTURAL RESOURCES

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:

a) 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 5030.1(k), or

Comment:

As discussed in section 5.a, Alice P. Duffee conducted a cultural resources evaluation of the project site. The investigation determined that none of the existing structures on-site qualifies to be classified as structures of historical significance due to either their deteriorating or semi-recent construction.

Significance Level:

No Impact

b) 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:

As discussed in Section 5.b, a cultural resources study was performed and reviewed by a local tribe upon their request. The tribe requested a native monitor to be present at the site during ground disturbance to accommodate the project, the request was accepted by Permit Sonoma staff and the applicant, and has been made condition of approval and Mitigation Measure TCR-1.

Significance Level:

Less than Significant Impact with Mitigation Incorporated

Mitigation Measure TCR-1:

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

- a. Prior to ground disturbance, the applicant/operator shall have secured an Archeological Monitor approved by the Federated Indians of Graton Rancheria to be on-site and report on the findings or lack thereof during the activities.
- b. On the first day of scheduled earth disturbing operations (grading, scraping, grubbing, vegetation stripping, trenching, or other site preparation), the work crew should meet with the Project Archaeologist and the Archaeological Monitor for an explanation of the contingency plan for encountering historic properties, and the appropriate actions for them to take. The meeting will include a description of the indicators of an archaeological deposit and distribution of brochures describing the appropriate actions to take if anything is encountered.
- c. Monitoring shall consist of direct observation the major excavation process. Monitoring shall occur during all project ground-disturbing activities involving grading and/or excavation up to a depth of five feet, unless the Archaeological Monitor determines that additional monitoring is required. Spot checks shall consist of partial monitoring of the progress of excavation over the course of the project. During spot checks all spoils material, open excavations, recently grubbed areas, and other soil disturbances shall be inspected. The frequency and duration of spot checks shall be based on the relative sensitivity of the exposed soils and active work areas, as determined by the Archaeological Monitor.
- d. In the event that paleontological resources or prehistoric, historic, or tribal cultural resources are discovered at any time during grading, scraping, excavation, or other ground disturbing activity within the property, all work should be halted in the vicinity of the find and the applicant/operator must immediately notify Permit Sonoma Project Review staff of the find. Paleontological resources include fossils of animals, plants or other organisms. Prehistoric resources include humanly modified stone, shell, or bones, hearths, firepits, obsidian and chert flaked-stone tools (e.g., projectile points, knives, choppers), midden (culturally darkened soil containing heat-affected rock, artifacts, animal bone, or shellfish remains), stone milling equipment, such as mortars and pestles, and certain sites features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe. Historic resources include all byproducts of human use greater than fifty (50) years of age including, backfilled privies, wells, and refuse pits; concrete, stone, or wood structural elements or foundations; and concentrations of metal, glass, and ceramic refuse. Permit Sonoma staff should consult with the appropriate tribal representative(s) from the tribes known to Permit Sonoma to have interests in the area to determine if the resources qualify as Tribal Cultural Resources (as defined in Public Resource Code § 21074). If determined to be a Tribal Cultural Resource, Permit Sonoma would further consult with the Federated Indians of Graton Rancheria and project proponents in order to develop and coordinate proper protection/mitigation measures required for the discovery. Permit Sonoma may refer the mitigation/protection plan to designated tribal representatives for review and comment. No work shall commence until a protection/mitigation plan is reviewed and approved by Permit Sonoma Project Review Staff. Mitigations may include avoidance, removal, preservation and/or recordation in accordance with California law. The applicant/operator shall be responsible for the cost to have a qualified paleontologist,

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

Mitigation Monitoring TCR-1:

Action: Conduct cultural resource awareness training prior to any ground disturbance. A qualified archaeologist shall monitor excavation work. Stop work if any artifacts or human remains are encountered; include notes on all site plans.

Implementing Party: Project Applicant

Timing: Prior to and during ground disturbing activities and project construction

Monitoring Party: Permit Sonoma

Failure by the Permit-Holder to comply with these requirements shall be considered a violation of the Permit and may result in the modification or revocation proceedings of the Permit.

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:

The project would involve construction of new on-site water and septic systems.

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:

As mentioned in Hydrology and Water Quality Sub-section 10.b and 10.e, the project is located in a priority groundwater basin, and the site is dissected in groundwater availability areas classified as 1 (major groundwater basin) and 3 (marginal groundwater availability). Permit Sonoma's Geologist review the proposal and deemed it adequate for approval, subject to standard conditions and water consumption restricting conditions described under Mitigation Measures HYDRO-1 through HYDRO-8.

Significance Level:

Less than Significant Impact with Mitigation Incorporated

- 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:

New septic systems would be constructed for future residential development. There would 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:

Sonoma County has a solid waste management program in place that provides solid waste collection and disposal services for the entire County. The program can accommodate the permitted collection and disposal of the waste that would result from the proposed project. The addition of a few single-family residences would not create solid waste in excess of the capacity of the County's solid waste system.

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

Significance Level:

Less than Significant Impact

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:

There is no adopted emergency response or evacuation plan for this area. As mentioned in Public Services Sub-section 15.a.i, the proposed project includes access improvements that comply with County-adopted Fire Regulations to ensure safe access for emergency vehicles concurrently with civilian evacuation, and unobstructed traffic circulation in the event of a wildfire emergency. In addition, when the residences are constructed, the property owners would be required to pay the fire development impact fees to support the Sonoma Fire District. This will support emergency services response to proposed home sites and that will support evacuation in the event of an emergency.

Project compliance with the California Fire Code and approval of project compliance with these standards by the Sonoma County Fire Marshal would ensure the project would have a less than significant impact related to emergency response and evacuation planning.

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:

As mentioned in Hazards and Hazardous Materials Sub-section 9.g, the project site is not within a fire hazard severity zone; due to a mix of topographic aspect of the project site and its vicinity, as well as the surrounding urban buildup. The overall topography of the project site is gently sloped with a slight easterly aspect, and elevations range from approximately 521 to 497 feet above sea level. The project site contains slopes of 2% and lower, which are not proposed to be increased. The project would not contribute to fire ignition or intensification.

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 project involves the construction of a roadway and utilities easement, to be used by all three new parcels. The project was reviewed and conditionally accepted by Permit Sonoma's Engineering and Fire Prevention divisions, as well as the County's Department of Transportation of Public Works. One of the conditions of approval is to require utilities to be underground whenever possible. The minor subdivision is not considered a large-scale project, and therefore it will have a less than significant impact on fire risk.

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:

As mentioned in Geology and Soils Sub-section 7.a, Hazards and Hazardous Materials Sub-section 9.g, Hydrology and Water Quality Section 10, and Wildfire Sub-section 20.b; the existing and proposed site conditions would not expose people or structures to significant risks involving downslope or downstream flooding, landslides, runoff, post-fire instability, or drainage changes. The project is not located in a flood zone, will adhere to County standards and BMPs to minimize erosion, and is not in a landslide prone area.

Significance Level:

Less than Significant 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?**

Comment:

Potential project impacts on special-status plant and wildlife species and habitat are addressed in Section 4. Implementation of required Mitigation Measures BIO-1 through BIO-3 would reduce these potential impacts to a less-than-significant level.

Potential adverse project impacts to cultural resources are addressed in Section 18. Implementation of required Mitigation Measure TCR-1 would reduce these potential impacts to a less-than-significant level.

Significance:

Less than Significant Impact with Mitigation Incorporated

- 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)?**

Comment:

No project impacts have been identified in this Initial Study that are individually limited but cumulatively considerable. The project would contribute to cumulative impacts related to air quality, biological resources, cultural resources, and noise, but mitigation measures included in this Initial Study would reduce the project’s contribution to these cumulative impacts to less than significant levels (i.e., not cumulatively considerable).

Significance:

Less than Significant Impact with Mitigation Incorporated

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

Comment:

Proposed project operations have the potential to cause substantial adverse impacts on human beings, both directly and indirectly. However, all potential impact and adverse effects on human beings (resulting from air quality, noise, traffic, aesthetics, geology and soils, wildfire) were analyzed, and would be less than significant with the mitigations identified in the Initial Study and would be incorporated into the project.

Significance:

Less than Significant Impact with Mitigation Incorporated

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