



## ***Initial Study Mitigated Negative Declaration***

Publication Date:  
Public Review Period: Sept. 19 – Oct. 19, 2023  
State Clearinghouse Number:  
Permit Sonoma File Number: ADR22-0058  
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Pursuant to Section 15071 of the State CEQA Guidelines, this Initial Study, recommended permit conditions of approval and Categorical Exemption, constitute the environmental review conducted by the County of Sonoma as lead agency for the proposed project described below:

**Project Name:** Sonoma Moll Storage Design Review

**Project Applicant/Operator:** Evan Lillevand

**Project Location/Address:** 22684 Broadway, Sonoma

**APN:** 128-422-062

**General Plan Land Use Designation:** Limited Rural Industrial District (M3)

**Zoning Designation:** M3 (Limited Rural Industrial District), F2 (Floodplain), VOH (Valley Oak Habitat)

**Decision Making Body:** Staff as assigned through Director  
Action by staff is appealable within 10 calendar days.

**Appeal Body:** Design Review Committee

**Project Description:** New 55,170 sq ft self-storage building.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

Environmental factors listed below were considered by evaluating the project. 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:

**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.

**Table 1. Initial Study**

Topic Area	Abbreviation	No Impact	Less than Significant Impact	Potentially Significant Unless Mitigated	Potentially Significant or Significant Impact
Aesthetics	VIS	X			
Agricultural & Forest Resources	AG	X			
Air Quality	AIR			X	
Biological Resources	BIO			X	
Cultural Resources	CUL		X		
Energy	ENE	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	TRAF	X			
Tribal Cultural Resources	TCR		X		
Utility and Service Systems	UTL		X		
Wildfire	WILD		X		
Mandatory Findings of Significance			X		

**RESPONSIBLE AND TRUSTEE AGENCIES**

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

Table 2. <b>Agency</b>	<b>Activity</b>	<b>Authorization</b>
Regional Water Quality Control Board	Potential wetland fill or disturbance	Section 401 and 404 permitting
Army Corps of Engineers		

**ENVIRONMENTAL FINDING:**

Based on the evaluation in the attached 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.

*Peter Kaljian*

August 24, 2023

Prepared by: Peter Kaljian

Date:

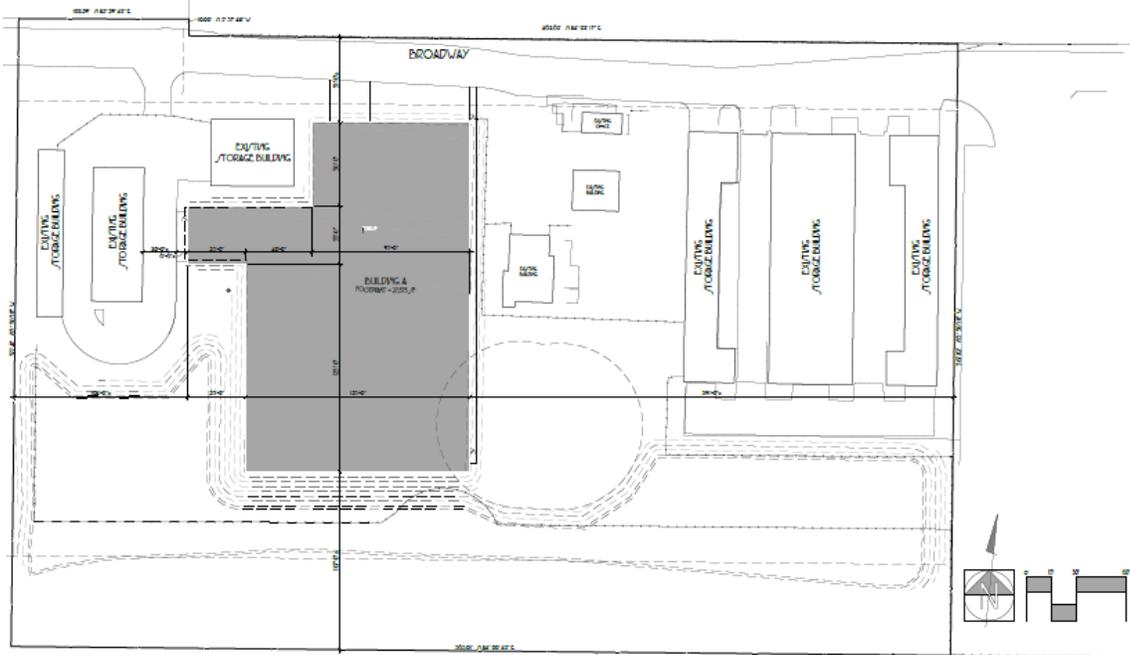
## Initial Study

### I. INTRODUCTION:

Permit Sonoma, (Sonoma County Permit and Resource Management Department) has prepared an Initial Study for a Design Review application to build a 55,170 sq ft self-storage facility on a 4.79-acre parcel.

The Planner sent a referral letter to the appropriate local, state and federal agencies and interest groups who may wish to comment on the project. Assembly Bill 52 Project Notifications were sent to the Lytton Rancheria of California, Middletown Rancheria Band of Pomo Indians, Mishewal Wappo Tribe of Alexander Valley, the Federated Indians of Graton Rancheria, Cloverdale Rancheria Band of Pomo Indians and Kashia Pomo's Stewarts Point Rancheria. Graton Rancheria identified the area as being within the tribe's ancestral territory and wished to remain informed of any cultural resource studies. All cultural resources studies were sent to the tribe for review and no request for consultation was received.

This report is the Initial Study prepared pursuant to the California Environmental Quality Act (CEQA). Peter Kaljian, Project Review Planner I for the Sonoma County Permit and Resource Management Department, Project Review Division (Permit Sonoma) prepared this report with technical assistance. Qualified Consultants provided the attached technical studies attached to this Initial Study to support the conclusions. Other reports, documents, maps and studies referred to in this document are available for review at the Permit and Resource Management Department (Permit Sonoma) or on the County's website at: <https://permitsonoma.org/regulationsandinitiatives>



### II. ENVIRONMENTAL SETTING

The 4.79-acre project site is a partially developed parcel located at 22684 Broadway in Sonoma, CA (APN 128-422-062), 2-mi south of the City of Sonoma. The surrounding land uses are industrial (warehouses and commercial millworks) and residential. The parcels on either side of the project site include Daniels Classic Auto Body to the west, Bright Event Rentals to the east, All Truss roof truss manufacturing to the south, and Arbor Fencing to the north. A single-family residence also exists on the abutting parcel to the north behind Arbor Fencing. All abutting parcels are zoned M3 (Limited Rural Industrial District), F2 (Floodplain), VOH (Valley Oak Habitat).

Existing Uses: The parcel is presently developed with two self-storage facilities on either end of the property and a single-family residence in between. The existing self-storage facilities were built in 1990 and 1995 in accordance with building permits (B-130545 & B-101549), with the single-family dwelling being built under a 1973 permit (B-002724) issued to John Moll. The current self-storage facilities include 6 existing buildings, 3 on the west side of the parcel and 3 on the east side. Two workshops and a small single-family dwelling exist in the middle of the site. A septic field is located behind the existing single-family dwelling and would be protected with this project. The lot entrance from highway 12 is through an easement located on the property to the west (APN128-422-069). All existing uses are allowed under the M3 (Limited Rural Industrial District) base zoning.

Topography and Soils: The existing site is flat with slopes ranging from 0 to 13%. The soils are mapped as Zamora silty clay loam, 0 to 2 percent slopes.

Drainage: Runoff from the existing development flows to a 4ft depression stormwater retention basin on the south side of the property. A stormwater retention and management plan has been prepared for this development in accordance with Low Impact Development requirements and submitted with grading permit (GRD20-0025).

Vegetation, Habitats, and Biological Resources: The site is dominated by tall grasses and some mature trees including oaks on the property. No streams or riparian corridors are located within or near the project site. The existing drainage basin contains potential wetlands that may be subject to permit approval for disturbance due to proposed grading.

Cultural Resources: Historical research and an evaluation of the on-site residence at 22684 Broadway was conducted and found that no portion of the parcel is eligible for inclusion on the California Register of Historical Places. A cultural resource was identified near the property, Vaca-Lakeville #1 (P-49-005193) electrical transmission lines. Although P-49-005193 is plotted within the study area, no structures (e.g. towers) related to the transmission line are present on the project site and no other resources were identified.

Noise: Existing ambient noise on the parcel is from California 12, the adjacent truss manufacturing facility, and customer parking (engine starts, door closing).

Traffic and Parking: The parcel is accessed by vehicles via Highway 12 and then a private road with access over APN: 128-422-069. The private road serves the project parcel (including the existing self-storage facilities and the single-family residence) as well several other parcels. The self-storage facilities are presently accessible to customers 24hr a day. There are 11 existing on-site parking spaces for customers of the existing self-storage facility (6 at the facility on the east side and 5 at the facility on the west side). The proposed development includes 7 new parking spaces to support the development.

Air Quality and Greenhouse Gas Emissions: Current conventional pollutant and greenhouse gas (GHG) emissions are predominately from customer vehicle emissions and electricity consumption for the existing single-family dwelling. Proposed emissions include additional customer vehicle emissions and construction-related emissions.

Scenic corridors and landscapes: This parcel is not located within a scenic resource unit or view corridor.

Water, Wastewater, and Waste Disposal: The existing self-storage facilities and residences are served

by an on-site private well and septic system (on-site mound septic system). Proposed water use (predominately for irrigation) was estimated to be .23-acre feet per year by MacNair Landscape architects. Improvements are proposed to the existing septic to relocate leach lines outside of the proposed building envelope (SEP22-0434). All solid wastes are removed by a local waste hauler.

### III. PROPOSED PROJECT

This project proposes to continue and expand this parcel's established self-storage facilities. The project seeks to fill the spaces between two existing self-storage facilities with a 55,170 sq ft two-story facility. The existing facilities are smaller in scale than the proposed 2-story building and are open-air style. This proposed expansion of use would maximize the buildable space on this parcel by adding the proposed building and reconfiguring the existing septic leach line. Seven new parking spots are proposed 6 standard parking spaces, and 1 ADA-compliant space. The site is relatively level so minimal earthwork will be required; however, a grading permit has been applied for by the applicant.

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

On September 26, 2022, Permit Sonoma circulated a referral packet to inform and solicit comments from selected relevant local, state and federal agencies and special interest groups anticipated to take interest in the proposed project. The following issues were raised:

Fire Prevention:

- Water system capacity in relation to fire suppression system

Grading and Stormwater:

- Stormwater management

Measures that substantially reduce potential impacts to a level of insignificance are incorporated into the project and presented in the Initial Study.

### 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 applicant, Cort Munselle, 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.

## 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 would not have a substantial adverse effect on a scenic vista as it is not visible from public roads or scenic resource areas.

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: Although the discussion of tree removal was raised in the arborist's report the final proposal would save most of the trees. The project site is not visible from any portion of Highway 12. The project will be conditioned to protect and preserve existing trees during construction.

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 project is not located within a scenic view corridor or in a scenic landscape unit and would not be visible from the public right of way on highway 12 as it would be screen by the immediately adjacent property, including mature trees. Therefore, the project would not degrade the existing visual character or quality of public views of the site and its surroundings.

Significance Level: No Impact

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

Comment: The project is shielded from view from the public right of way on Highway 12 and does not propose substantial lighting. The project uses minimal lighting, and all proposed lighting is fully shielded, down cast and dark sky compliant. For these reasons, the project does not create a new source of substantial light or glare.

Significance Level: No Impact

## 2. AGRICULTURE AND FOREST RESOURCES:

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: Not applicable.

Significance Level: No impact.

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

Comment: Not applicable.

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: Not applicable.

Significance Level: No impact.

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

Comment: Not applicable.

Significance Level: No impact.

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

Comment: Not applicable.

Significance Level: No impact.

### **3. AIR QUALITY:**

Where applicable, the significance criteria established by the applicable air quality management district 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 would not conflict with or obstruct implementation of the applicable air quality plan.

Significance Level: No Impact

- b) **Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable federal or state ambient air quality standard?**

Comment: State and Federal governments have established standards for six criteria air pollutants:

ozone, carbon monoxide (CO), nitrogen dioxide, sulfur dioxide, and particulates with a diameter of less than 10 and 2.5 microns (PM<sub>10</sub> and PM<sub>2.5</sub>, respectively). In addition to criteria air pollutants, there are other, secondary pollutants that can lead to the formation of criteria air pollutants. For example, nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOC) react with sunlight and can lead to the formation of ground level ozone. Once completed this project would not result in a cumulatively considerable net increase of any criteria pollutant due to low traffic generation.

#### Construction Emissions

Project construction activities would include site preparation, grading, building construction, paving, and architectural coating. Ground disturbing activities, such as site preparation and grading, and construction could generate dust and particulate matter, that if not regulated, could result in adverse cumulatively significant air quality impacts. Potential construction impacts are addressed in the following mitigation measure and conditions of approval of the project.

Significance Level: Potentially Significant Unless Mitigated

#### Mitigation:

##### Dust Control

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

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

Mitigation Monitoring: The above notes shall be included on construction permits prior to issuance and inspectors shall verify compliance during construction.

#### Operational Emissions

Following construction, operational activities would generate air pollutant emissions from the following sources: mobile (i.e., vehicle trips), energy (building electricity and natural gas usage), and area (consumer products, periodic architectural coating, and landscape maintenance activities). Vehicle emissions would not be significant due to the low trip generation of the project at approximately 10 trips during the p.m. peak hour as identified by the Institute of Traffic Engineers mini storage use.

Significance Level: Less than Significant Impact

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

Comment: The project is located approximately 300 feet from the nearest off-site residence and is not located near any other sensitive receptor or population (school, hospital, nursing facility, etc.). In operation the project also will not emit a substantial pollutant concentration based on analysis 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 expected to result in other emissions, including odors.

Significance Level: No 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 preliminary biological assessment was conducted by botanist/wetland ecologist Jane Valerious. The site was relatively unchanged from a much earlier evaluation in 2005 and is dominated by non-native grasses. The grassland does not provide suitable habitat for any of the special status plants known to occur in the area and no special status plants were identified. Plants on the site are primarily upland species. An existing/proposed stormwater retention area appears to contain wetlands and would be regraded and continue to be utilized for stormwater retention. Regional Board 401 and USACE 404 permitting is required as necessary prior to grading permit issuance for potential disturbance of wetlands.

A Red shouldered hawk was observed during the site visit, however, no nesting trees were observed in the area and no other sensitive natural communities are present within the project parcel. Avoidance measures will be applied to protect any potential nesting. pre-construction surveys for potential nesting birds (passerine and raptors) if construction occurs during the nesting season.

Significance Level: Potentially Significant Unless Mitigated

**Mitigation Measure BIO-1: NOTE ON PLANS** Grading and any removal of vegetation should be conducted outside of the nesting season. If initial ground disturbance or vegetation removal occurs during the breeding season for nesting birds (February 1 through August 31), a qualified biologist shall conduct a breeding bird survey within 7 days of ground disturbance to determine if any birds are nesting in grasslands or adjacent trees. If active nests are found close enough to the project site to affect breeding success, the biologist shall establish an appropriate exclusion zone around the nest. This exclusion zone may be modified depending on the species, nest location, and existing visual buffers, but typically would entail a minimum of 500 feet for raptor species and 300 feet for other migratory species. Once all young have become independent of the nest, vegetation removal and grading may take place in the former exclusion zone.

**Monitoring BIO-1:** Prior to issuance of any building or grading permit(s), the Project Review Division shall ensure the above notes are shown on the plans, review the results of pre-construction surveys as applicable, and ensure that measures recommended by the biologist to avoid potential sensitive habitat or species are followed. All protection measures shall be noted on the final project construction plans.

- 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: No riparian areas or special status plants were identified by Jane Valerius, environmental consultant. An approximately 50-foot-wide depression running the length of the south side of the property has been identified as potential wetland and is proposed to be regraded and continue to be utilized for stormwater retention.

Significance Level: No impact.

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

Comment: No riparian areas or special status plants were identified by Jane Valerius, environmental consultant. An approximately 50-foot-wide detention basin running the length of the south side of the property has been identified as potential wetland. Potential wetlands are shown to be avoided by the proposed grading plan.

- 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: A Red shouldered hawk was observed during the site visit, however, no nesting trees were observed in the area. Avoidance measures have been applied to protect any potential nesting. No other sensitive natural communities are present within or near the project parcel.

Significance Level: Potentially Significant Unless Mitigated (see Bio 1 above).

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

Comment: The project will not conflict with any local policies or ordinances protecting biological resources including, but not limited to, the Sonoma County riparian corridor, valley oak habitat or tree protection ordinance. All existing trees were inventoried by MacNair and associates (consulting arborist) report. Although the arborists report performed in 2019 identifies trees to be removed the current project most of the existing trees are proposed to be saved. Any tree removal is subject to compliance with the County's tree mitigation requirements.

Significance Level: Less than Significant.

- 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: Not applicable.

Significance Level: No impact

## **5. CULTURAL RESOURCES:**

On September 12, 2022, Assembly Bill 52 Project Notifications were sent to the Lytton Rancheria of California, the Federated Indians of Graton Rancheria, Kashia Band of Pomo Indians of California, and Stewarts Point Rancheria. These Native American tribes were invited to consult on the project pursuant to Public Resources Code sections 21080.3.1 and 21080.3.2.

**Would the project:**

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

Comment: Historical research and an evaluation of the site was conducted by Tom Origer & Associates, Archaeology/Historical Research. They found that no part of the property appears eligible for inclusion on the California Register of Historical Places.

Research found no historically important people associated with this property, the buildings are not

architecturally distinctive, and they possess no intrinsic qualities that will yield important information.  
Significance Level: No impact

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

Comment: Tom Origer & Associates report includes Native American contact, archival research, and a field study. Native American contact resulted in a request to review the cultural resources study, but did not result in any further request for consultation. The field survey found no archaeological sites or no significant resources in the study area. However, the study also identified a 5-20% chance of unearthing potentially buried resources. As a result of those finding the following language be printed on the construction plans:

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

Significance Level: Less than Significant

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

Comment: No human remains have been identified on the project site. However, the following language shall be printed on the construction plans:

**NOTES ON PLANS:** “If human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and PRMD staff, County Coroner and a qualified archaeologist must be notified immediately so that an evaluation can be performed. If the remains are deemed to be Native American and prehistoric, the Native American Heritage Commission must be contacted by the coroner so that a “Most Likely Descendant” can be designated.”

Significance Level: Less than Significant.

## **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: The project will not result in significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Standard construction practices will be used. The self-storage facility will use modern energy efficient materials, lighting and appliances in accordance with local building and energy codes.

Significance Level: No impact.

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

Comment: Not applicable.

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 is located on an alluvial plain in the Sonoma Valley. The Rodgers Creek fault is over 3 miles to the west. The project site is not located in or near a zone mapped in the Alquist-Priolo Earthquake Fault Zoning Map or in an area with other substantial evidence of a known fault based on published 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. Standard 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.

Grading permits are required for all project related construction prior to commencement of ground disturbance and therefore, any required earthwork, grading, trenching, backfilling or compaction operations will be done in accordance with the erosion control provisions of the Drainage and Storm Water Management Ordinance (Chapter 11, Sonoma County Code and Building Ordinance (Chapter 7, Sonoma County Code).

All project related construction activities are required to comply with the California Building Code regulations for seismic safety (i.e., reinforcing perimeter and/or load bearing walls, bracing parapets, etc.) as part of the permitting process. Construction plans shall be subject to review and approval of Permit Sonoma prior to the issuance of a building permit. All work shall be subject to inspection by PRMD and must conform to all applicable code requirements and approved improvement plans prior to the issuance of a certificate of occupancy.

Based on this uniformly applied regulatory process, the project would not expose people to substantial risk of injury from seismic shaking, and the potential impact is less than significant.

Significance Level: Less than significant.

**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 in ground failure. The project site is located in a Liquefaction Hazard Area of high susceptibility. All new structures are subject to engineering standards of the California Building Code and site specific soil and construction requirements. Because of the permitting standards required for all construction activities, potential impacts are less than significant.

Significance Level: Less than significant.

**iv. Landslides?**

Comment: The project site is located on relatively flat, alluvial plains and not in an area of known landslides or otherwise prone to landslides.

Significance Level: No impact.

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

Comment: The project site is developed with buildings, landscaping and a septic field. Soil erosion during construction will be minimized through the implementation of erosion control best practices as required by the grading ordinance. The post-project site will also be fully developed in the same manner. The project once it is completed, should not directly or indirectly cause potential substantial adverse effects due to erosion or loss of topsoil given the project landscaping and low impact development water quality treatment features.

Significance Level: Less than Significant

**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: See discussion in subparagraph (a), above.

Significance Level: Less than Significant.

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

Comment: See discussion in subparagraph (a), above.

Significance Level: Less than Significant.

**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 Existing Septic system will be expanded or replaced, and the applicant will be required to comply with current Sonoma County On-Site Wastewater Treatment System (OWTS) requirements and to obtain a permit for the construction and operation of the system.

Significance Level: Less Than Significant.

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

Comment: The alluvial plains and terraces of the Sonoma Valley region are not generally known for unique paleontological resources or geological features. Alluvial soil deposits can be very deep with bedrock located tens to hundreds of feet below the ground surface. The proposed changes will only require surface grading and will not further disturb natural soils below areas already disturbed.

Significance Level: Less Than Significant

## 8. GREENHOUSE GAS EMISSIONS:

Would the project:

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

Comment:

The Climate Action 2020 Plan developed by the Sonoma County Regional Climate Plan Authority (RCPA) in 2016 was unable to be formally adopted due to litigation. The Sonoma County Board of Supervisors-adopted May 8, 2018, Climate Change Action Resolution acknowledged the Climate Action 2020 Plan and resolved to "...work towards the RCPA's countywide target to reduce GHG emissions by 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050", consistent with SB32 and AB197 climate pollution reduction targets, as well as adopting twenty goals for reducing GHG emissions including increasing carbon sequestration, increasing renewable energy use, and reducing emissions from the consumption of goods and services. The Bay Area Air Quality Management District (BAAQMD) has published greenhouse gas significance thresholds for use by local governments in the report titled California Environmental Quality Act Air Quality Guidelines May 2017.

In order to determine the significance of the impact the project was analyzed against BAAQMD 2017 screening criteria for operational GHG emissions. The project (55,170 sq. ft.) is below the operational screening criteria for warehouse development set at 64,000 square feet. Because the project is below the applicable screening criteria, it will not exceed the BAAQMD recommended GHG emission thresholds or result in significant impacts.

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's adopted goals and policies include GP Policy OSRC-14.4 to reduce greenhouse gas emissions 25% below 1990 levels by 2015. Sonoma County emissions in 2015 were 9% below 1990 levels, while the countywide population grew 4%. In May 2018, the Board of Supervisors adopted a Resolution of Intent to Reduce Greenhouse Gas Emissions that included adoption of the Regional Climate Protection Agency's goal to further reduce greenhouse gas emissions by 40% below 1990 levels by 2030 and by 80% below 1990 levels by 2050, consistent with SB32 and AB197 climate pollution reduction targets. The Resolution of Intent included the following measures that can further reduce greenhouse gas emissions:

- 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

All new development is required to evaluate all reasonably feasible measures to reduce greenhouse gas emissions and potentially enhance carbon sequestration. A standard condition of approval has been incorporated into the project, requiring the applicant submit a Greenhouse Gas Emissions Reduction Plan prior to building permit issuance. The plan shall include all reasonably feasible greenhouse gas emission reduction measures outlined above. As discussed in section (a) above, the proposed project would not be expected to generate GHG emissions that exceed BAAQMD-recommended CEQA thresholds. The project, therefore, would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

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 uses do not involve the routine transport, use or disposal of hazardous materials,

Significance Level: No 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: The project uses do not involve the routine transport, use, or disposal of hazardous materials and are not expected to otherwise create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

Significance Level: No 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 uses do not involve the routine transport, use, emissions, or disposal of hazardous materials.

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: This parcel does not appear on the Government Code Section 65962.5 list and the nearest evaluated site is approximately 3 miles to the north.

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 is within two miles of the privately owned Schellville airport, but would not result in a safety hazard.

Significance Level: No impact.

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

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

Significance Level: No impact.

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

Comment: The project is not within a designated fire hazard severity zone., The fire protection Response area is local (Schell-Vista FPD). It is possible that a fire could start or spread onto the property, however, there are no features of the project that are inherently flammable such as to create unusual exposure to people or property loss. The project is conditioned to comply with current building and fire codes.

Significance Level: Less than significant.

## **10. HYDROLOGY AND WATER QUALITY:**

**Would the project:**

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

Comment: The project is located in the Lower Sonoma Creek, a tributary of the San Pablo Bay Estuaries but streams are not located in or near the project parcel. Currently, the project parcel is developed with built features. Stormwater from parking areas or roof drains is collected in a depression area on the back (south) end of the property where it can infiltrate.

The proposed project will expand stormwater retention features and comply with current Sonoma County stormwater management standards by installing bio-retention features surrounding the proposed development to treat and infiltrate or store stormwater. This will address post construction storm water

impacts and be an improvement over current condition.

Significance Level: No impact.

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

Comment: Proposed water use from irrigation is estimated to be .23-acre feet per year according the MacNair landscape architects. Additional water use from one on-site employee would likely be less than this amount. Overall, the anticipated water use from the new use is expected to be less than .5 acre feet per year, considered as diminimus in the Sonoma Valley Ground Water Management Plan.

Significance Level: No impact.

**c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which**

**i. would result in substantial erosion or siltation on- or off-site?**

Comment: As discussed in paragraph 7(b), above, the project will be required to comply local, state and federal standards for erosion and sediment control during active construction which will avoid or limit the chances of substantial erosion or siltation on- or off-site.

Significance Level: No impact.

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

Comment: The site is within an area known for flooding. However, as discussed in subparagraph (a) above, the project would utilize and expand an existing on-site storm water feature for retention and treatment. Standard drainage conditions require that an engineers report be provided to demonstrate that stormwater associated with the project meet flood control design criteria to ensure flooding in the area will not be exacerbated by the project.

Significance Level: Less than Significant.

**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: The project will be required to comply with local, state and federal standards for storm water and erosion and sediment control, which will avoid flooding and protect water quality.

Significance Level: Less than significant.

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

Comment: The project would not impede or redirect flood flows as onsite stormwater capture is provided.

Significance Level: No impact.

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

Comment: The site is within a special flood hazard area, but includes a stormwater management plan to address potential flooding.

Significance Level: Less than significant.

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

Comment: The project is aligned with the applicable basin plan by upgrading stormwater management on the site to include on-site bioretention features and by minimizing groundwater use.

Significance Level: No impact.

## **11. LAND USE AND PLANNING:**

**Would the project:**

**a) Physically divide an established community?**

Comment: The project does not physically divide an established community.

Significance Level: No impact.

**b) Cause a significant environmental impact due to a conflict with any and use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

Comment: All applicable land use policies and regulations were applied and any potential significant environmental effects, were addressed in the project design and conditions of approval.

Significance Level: No 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: Not applicable.

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: Not applicable.

Significance Level: No impact.

## **13. NOISE:**

**Would the project:**

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

Comment: no significant increases in ambient noise are expected as a result of this project. Short-term construction activities would periodically increase ambient noise levels at the project site and vicinity and would subside once construction of the proposed project is completed. Mitigation Measure NOISE-1 would reduce the potential temporary noise impact to a less than significant level.

Significance Level: Potentially Significant Unless Mitigated

**Mitigation Measure NOISE-1: NOTE ON PLANS:** All 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. (use this if no nearby receptors, or 5:00 pm if nearby receptors) on weekdays and 9:00 a.m. and 7:00 p.m. (same note as above) on weekends and holidays. If work outside the times specified above becomes necessary, the applicant shall notify the PRMD Project Review Division as soon as practical.
- c) There will be no startup of 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, (same note as above) Monday through Friday or prior to 9:00 a.m. nor past 7:00 p.m. on weekends and holidays and no servicing of equipment past 7:00 p.m., Monday through Friday, or weekends and holidays. A sign(s) shall be posted on the site regarding the allowable hours of construction and including the developer- and contractors mobile phone number for public contact 24 hours a day or during the hours outside of the restricted hours.
- d) Pile driving activities shall be limited to 7:30 a.m. to 7:00 p.m. weekdays only (same note as above).
- e) Construction maintenance, storage and staging areas for construction equipment shall avoid proximity to residential areas to the maximum extent practicable. Stationary construction equipment, such as compressors, mixers, etc., shall be placed away from residential areas and/or provided with acoustical shielding. Quiet construction equipment shall be used when possible.
- f) The developer shall designate a Project Manager with authority to implement the mitigation prior to issuance of a building/grading permit. The Project Managers 24-hour mobile phone number shall be conspicuously posted at the construction site. The Project Manager shall determine the cause of noise complaints (e.g., starting too early, faulty muffler, etc.) and shall take prompt action to correct the problem.

**Monitoring NOISE-1:** PRMD Project Review Division staff shall ensure the Note is on all site alteration, grading, building or improvement plans, prior to issuance of grading or building permits. PRMD staff shall verify that the signs are in place and the applicable phone numbers are correct. Any noise complaints will be investigated by PRMD staff. If violations are found, PRMD 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: No substantial groundborne vibration or noise are expected as a result of this project. Short-term construction activities may periodically produce groundborne vibration at the project site and vicinity and would subside once construction of the proposed project is completed.

Significance Level: Less than significant

**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: Not applicable.

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 current project includes one employee, and the proposed project also includes one employee. The project does not propose new homes or new businesses or other uses that would induce substantial population growth.

Significance Level: No impact.

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

Comment: Not applicable.

Significance Level: No impact.

## **15. PUBLIC SERVICES:**

**Would the project:**

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

Comment: There is a currently a commercial business and single-family residence on the project parcel. This will stay the same under the proposed project. Land use of commercial facilities will expand to include the proposed 55k sq ft building but will not change hours of operation. It is not expected that this will result in the need for new or physically altered governmental facilities in order to provide services to the project parcel.

The Schell-Vista FPD will continue to serve this area. Sonoma County Code requires that all new development meet Fire Safe Standards (Chapter 13), which includes 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 requirement for all new development and therefore potential impacts would be less than significant.

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 project would not increase regional recreational facility usage,

Significance Level: No impact.

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

Comment: Not applicable.

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: The project would result in low traffic generation (less than 10 p.m peak hour trips) according to the institute of traffic engineers manual. Therefore, no traffic analysis is required and no adverse impacts have been otherwise been identified with the project. It has been determined that the project would comply with General Plan Level of Service requirements. However, due to substandard conditions at nearby intersections in the area, the applicant is required to pay their fair share of traffic mitigation fees to contribute to area-wide transportation improvements.

Significance Level: Less than significant.

- b) **Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) (evaluation of transportation impacts of land use projects using vehicle miles traveled)?**

Comment: Due to low traffic generation, the project would be under the mandated targeted reduction for VMT and is exempt from further VMT analysis.

Significance Level: No 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 commercial access to Highway 12 and the alignment of the private roadway access. Caltrans and Sonoma Public infrastructure have not identified a need for improvements. Standard traffic mitigation fees are required. 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: No impact

**d) Result in inadequate emergency access?**

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

Significance Level: No impact.

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

Comment: Based on the results of the circulation and parking analysis study prepared by Architecture Real Estate Associates, the proposed project would have adequate parking capacity.

Significance Level: No impact.

## 18. TRIBAL CULTURAL RESOURCES:

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California native American tribe, and that is i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5030.1(k), or ii) A resource determined by the lead agency. In its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Comment: All applicable tribes consulted regarding the project declined to request further consultation and did not provide information that the project site has tribal cultural resources. Graton Rancheria requested results of cultural resources analysis as the projects may impact tribal cultural resources. However, did not wish to consult after receiving the resulting cultural resources report from Permit Sonoma. Additionally, the condition of approval discussed in 5.B offer protections for tribal cultural resources.

Significance Level: Less Than Significant

## 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 will require the construction of new storm water drainage facilities, however, these facilities will result in an improvement over existing conditions and will not result in a significant environmental impact. Septic improvements are required per County health and safety codes. No other utility concerns have been identified as documented in this report.

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 discussed in Section 10.B above the additional water use from the project would be de minimus at less than a half-acre-ft per year (0.23 Arce-ft Per year) and would result almost entirely from landscaping. The project is found to have sufficient water supplies available through use of the existing well to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Significance Level: Less than significant

- 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: Not applicable.

Significance Level: No impact.

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

Comment: The project will not generate excess solid waste.

Significance Level: Less than significant.

**e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

Comment: The project will comply with applicable solid waste management and reduction requirements.

Significance Level: No impact.

## **20. WILDFIRE**

**If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project: 1) Substantially impair an adopted emergency response plan or emergency evacuation plan; 2) 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; 3) 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; 4) 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: The project would not substantially impair an adopted emergency response plan or emergency evacuation plan; nor would it exacerbate wildfire risks, or require the installation or maintenance of associated infrastructure. The project would not contribute to any exposure of people or structures to significant risks. Water storage would be required to support a new fire sprinkler system and otherwise comply with County Fire safe standards.

Significance Level: No impact.

## **21. MANDATORY FINDINGS OF SIGNIFICANCE**

**a) Does the project have the potential to substantially 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, substantially 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: No substantial trees are to be removed as a result of the project nor will the project substantially reduce the habitat of a fish or wildlife species.

Significance Level: Less than Significant

- 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: For all of the reasons outlined above, it is not expected that this project will have impacts that are individually limited but cumulatively considerable.

Significance Level: Less than significant.

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

Comment: For all of the reasons outlined above, it is not expected that this project will cause substantial adverse effects on human beings.

Significance Level: No impact.

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