



2550 Ventura Avenue
Santa Rosa, CA 95403

p: (707) 565-1900
f: (707) 565-1017

Tennis Wick
Director

Scott Orr
Assistant Director

Michelle Arellano
Deputy Director, Administration

Nathan Quarles
Deputy Director, Engineering and Construction

Emi Theriault
Deputy Director, Planning

Proposed Mitigated Negative Declaration

Publication Date:	March 4, 2024
Public Review Period:	March 4 – April 3, 2024
State Clearinghouse Number:	
Permit Sonoma File Number:	PLP23-0026
Prepared by:	Joshua Miranda at
Phone:	(707) 565-1948

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

Project Name: Airport Major Subdivision and Planned Community

Project Applicant/Operator: Rick Rosenbaum, Lennox Home LLC

Project Location/Address: 175 & 245 Airport Boulevard Santa Rosa, CA

APN: 039-025-028 & 039-025-026

General Plan Land Use Designation: APN -028: UR 9; APN -026: UR 20

Zoning Designation: -028: Medium Density Residential (R2) with a density of 9 dwelling units per acre, with combining districts of Affordable Housing (AH) and Valley Oak Habitat (VOH).
-026: High Density Residential (R3) with a density of 20 dwelling units per acre and combining district of Valley Oak Habitat (VOH).

Decision Making Body: Sonoma County Planning Commission

Appeal Body: Sonoma County Board of Supervisors

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	FIRE		X
Mandatory Findings of Significance	MFS		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. Agency	Activity	Authorization
U. S. Army Corps of Engineers	Wetland dredge or fill	Clean Water Act, Section 401
	Work in navigable waters	Rivers and Harbors Act, Section 106
Regional Water Quality Control Board (North Coast)	Discharge or potential discharge to waters of the state	California Clean Water Act (Porter Cologne) – Waste Discharge requirements, general permit or waiver
	Wetland dredge or fill	Clean Water Act, Section 404
State Water Resources Control Board	Generating stormwater (construction, industrial, or municipal)	National Pollutant Discharge Elimination System (NPDES) requires submittal of NOI
California Department of Fish and Wildlife	Incidental take permit for listed plant and animal species; Lake or streambed alteration	Fish and Game Code, Section 1600

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
U. S. Fish and Wildlife Service (FWS) and or National Marine Fisheries Service (NMFS)	Incidental take permit for listed plant and animal species	Endangered Species Act
Sonoma Public Infrastructure (SPI)	Traffic and road improvements	Sonoma County Section 15 Municipal Code,

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.



March 4, 2024

Prepared by: Joshua Miranda

Date



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:

The project applicant Rick Rosenbaum, on behalf of Lennox Homes LLC, proposes a Major Subdivision to subdivide a 4.78-acre property into 57 residential lots with one 0.20 acre common area lot and a Use Permit for a Planned Development project to allow construction of 43 detached single family homes and 14 duet units for a for sale Planned Development. A referral letter was sent to the appropriate local, state and federal agencies and interest groups who may wish to comment on the project.

This report is the Initial Study required by the California Environmental Quality Act (CEQA). The report was prepared by Joshua Miranda, Project Review Planner with the Sonoma County Permit and Resource Management Department, Project Review Division. Information on the project was provided by Lennox Homes LLC. 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 Joshua Miranda, Planner, at (707) 565-1948, for more information.

II. EXISTING FACILITY

The 4.78-acre project site is located at 175 & 245 Airport Boulevard, Santa Rosa, and is comprised of two separate legal lots. It is in the unincorporated area of Larkfield-Wikiup, between the municipal boundaries of the City Santa Rosa and the City of Windsor. See Figure 1 for a vicinity map.

The project site is currently vacant, but past development activity has included three structures, two that were approximately located in the middle of the project site, and a single-family dwelling, that was near the southwestern corner of the project site, however all such structures have been demolished.

The property is triangular in shape and the level of terrain ranges from the western portion of the project site varies from approximately 150 feet above sea level in elevation on the flatter portions to 165 feet above sea level in elevation where the earthen dirt-fill hill occurs. The eastern portion of the project site is largely flat with very small undulations from past land use (buildings, driveways and associated activities over the years). A small "hill" is located on the western portion of the project site that was created by fill dirt that was deposited onsite. The remainder of the site is level to slightly level as there are small undulations from discing and mowing activities that take place annually for fire control. Prior to the currently property owner's ownership the project site had an army surplus store and shale rock was imported to the eastern portion of the project site to allow for parking.

Vegetations communities onsite consist of ruderal herbaceous habitat. Ruderal herbaceous communities are assemblages of non-native plants that thrive in waste areas, roadsides and other sites that have been disturbed by human activity which the project site can be characterized as from the project's proximity to old redwood highway and from past development activity described above.

Surface water runoff flows to the east and west into linear ditches that seasonally convey storm water. A total of 0.104 acres of seasonal wetlands are present on the site, which will be permanently filled and require authorization from the North Coast Regional Water Quality Control Board and the United States Army Corps of Engineers. No creeks or drainage swales pass directly through the site. The project site is

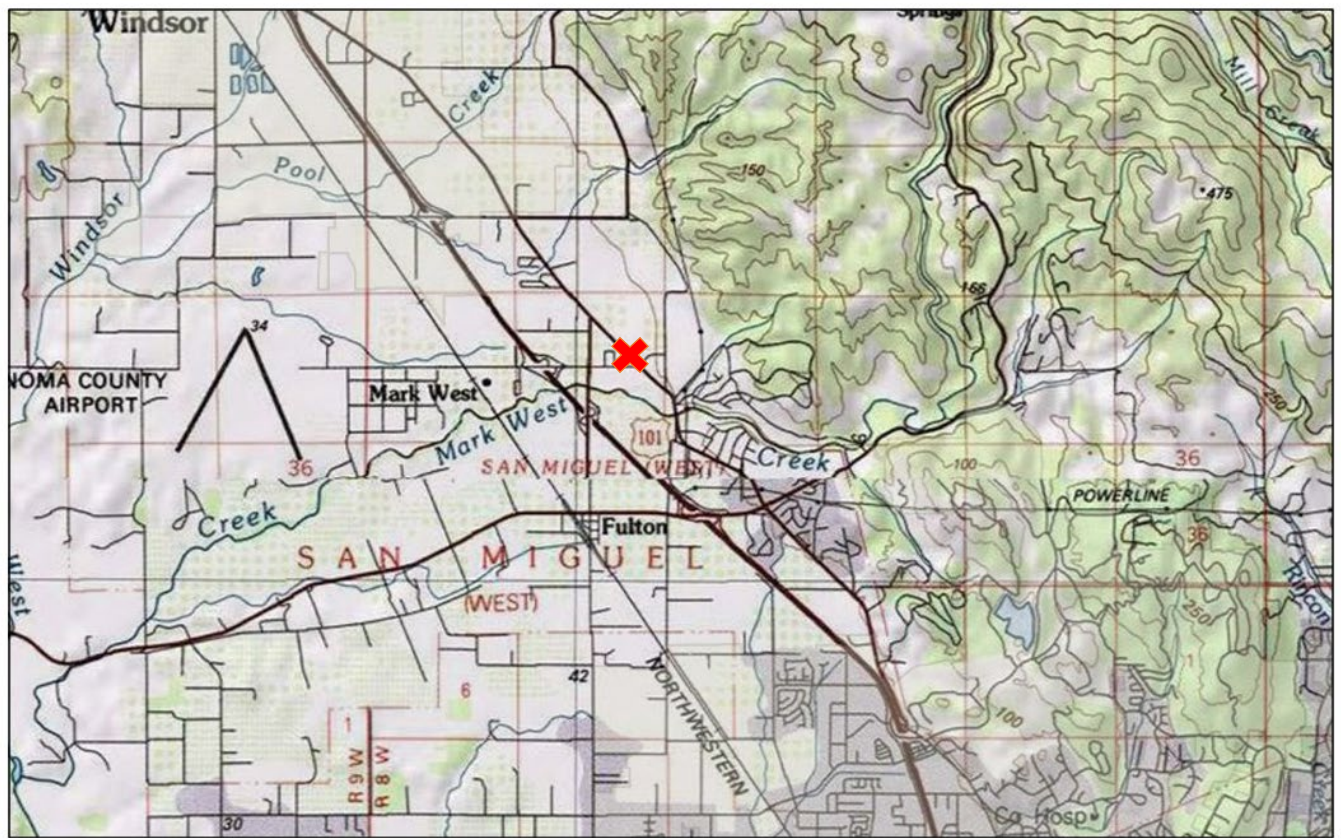
located within the Santa Rosa Plain Conservation area, however, is located outside of the Management and Core area of the Plan.

There are a total of 25 trees onsite or immediately adjacent to the site along the property lines. The tree species include oaks, Monterey pine, coast redwood, glossy privet and flowering pear.

The site is within a Zone 1 major groundwater availability area, and also within a medium priority ground water basin (Santa Rosa Plain) where groundwater use is managed by the Santa Rosa Groundwater Sustainability Agency.

As depicted in Figure 2 below, the site is situated in a mixed-use area in the Larkfield area. The surrounding uses include residential development, a gas station to the north, mobile home park development to the east, general commercial development to the south, and multi-family development to the east.

Figure 1. Vicinity Map



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City Limit

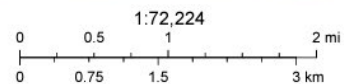
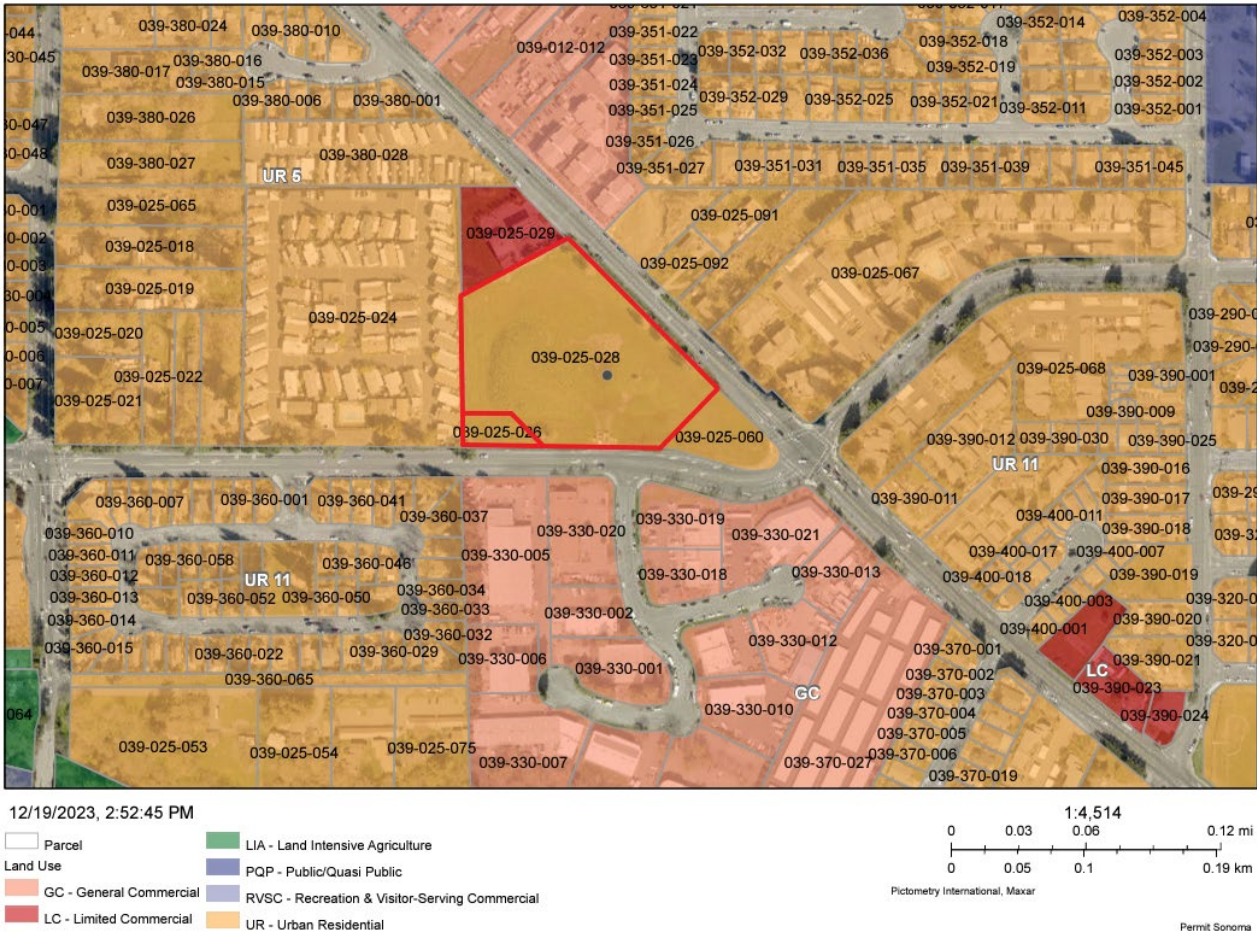


Figure 2. Surrounding Land Uses



Background:

In June 2004, Permit Sonoma prepared a Mitigated Negative Declaration (MND) in accordance with CEQA for a previous project on the site which was a request for 1) a General Plan Amendment from the Limited Commercial designation to the Urban Residential 11 dwelling units per acre designation, and 2) A Larkfield Wikiup Area Plan amendment from the Commercial designation to the Multi-Family Residential (5-11 units per acre) designation, and 3) a zone change from CO (Administrative and Professional Office) district to the R2 (Medium Density Residential), B6 11 dwelling units per acre district, and 4) Design Review of a 53 unit affordable housing project, on a 4.78 acre property located at 175 Airport Boulevard, Santa Rosa (APN's 039-025-026-028) . The Planning Commission held a public hearing on July 15, 2004, and recommended to the Board of Supervisors approval of the proposed project, and adoption of a mitigated negative declaration. The Board of Supervisors held a public hearing on August 17, 2004 and adopted the MND and approved the project subject to conditions of approval set forth in Board Resolution No. 04-1040.

On November 2, 2006 the project expired. No construction occurred onsite however the plan amendment and zone change completed.

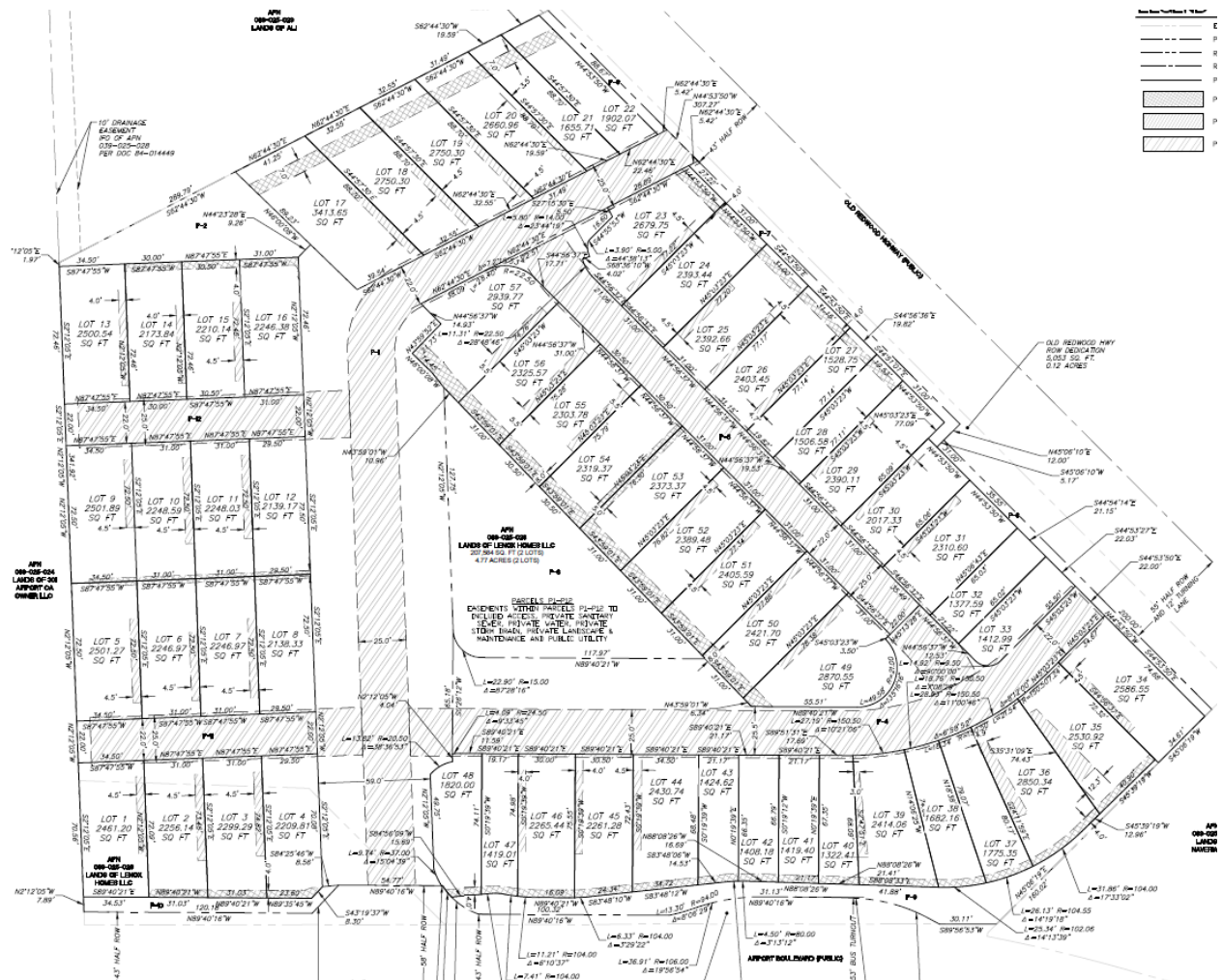
Since the current PLP23-0026 project was initially submitted, parcel -026 was rezoned with the adoption of the County's 2023-2031 Housing Element update. Previously the parcel's zoning and General Plan land use designation matched parcel -028 (i.e. Medium Density Residential with 9 dwelling unit per acre density). The Housing Element Update and related rezonings required an environmental impact report

and a Mitigation Monitoring and Reporting Program was adopted with the EIR. The following mitigations from the Housing Element Update EIR (State Clearinghouse #2022060323) apply to this project, have been incorporated into this ISMND as applicable, and/or will be included as conditions of approval for the project: AES-1, AES-2, AQ-1, AQ-2, BIO-1 through BIO-6, BIO-10 through BIO-12, BIO-14 through BIO-16, CUL-1, CUL-3, CUL-9, GEO-1, GHG-1, NOI-7, TRA-1, TRA-2, UTIL-1, WFR-1, and WFR-2.

III. PROJECT DESCRIPTION

The applicant proposes a major subdivision to subdivide, See Figure 3 below for Tentative Map, a 4.78 acre lot into 57 residential lots ranging from 1,332 square feet to 3,414 square feet in size, and one 0.20-acre common area lot (See also Attachment 2). Additionally, the project includes a Use Permit to allow a Planned Development Community involving new construction of 'for sale' units and reductions to standards for minimum lot size, lot width, setbacks, and lot coverage. The Planned Development project proposes 43 new detached single-family units and 14 new attached duet units between 1,230 to 2,058 square feet in size, as well as parking for 136 residents and guests. The base density of site allows for 42.93 units, which is rounded up to 43 units to allow for the 57 units. The applicant also requests a 32.6 percent density bonus under State law to achieve the 57-unit project by providing 13 percent of the base units or (6 units) for low-income households and 13 percent of the base units for moderate income households or another (6 units).

Figure 3. Proposed Tentative Map



Buildings, Units, and Uses.

The proposed building and unit inventory is provided in Table 1 below. The 57 new units following the subdivision will be entirely for residential uses. The proposed housing units range in size from approximately 1,230 to 2,058 square feet and feature 3 to 4 bedrooms floor plans (see Attachment 1 for Architecture Plans). Building heights for the new units will range from 26 to 30 feet depending on the plan number and elevation style.

The project proposes a 0.20-acre open space common area that would be accessible from all the homes and include picnic tables and a turf field. This common area will be maintained by the new Homeowner’s Association who will govern its use.

Each dwelling unit has a private outside yard space located in the side yard area between the homes. The minimum dimension for this private yard space in most cases is 20’ x 9’ or 180 square feet. These side-yard spaces are indicated on the site plan.

Table 1. Building and Unit Inventory

Unit Mix	Plan Number	Bedrooms	Livable Footage	Total Sq. Footage	Unit Mix
11	Plan 5	4+ bed	2,058	22,638	19%
9	Plan 4 Market Rate	4+ bed	1,885	16,965	21%
3	Plan 4 BMR	4+ bed	1,885	5,655	incl
11	Plan 3	4+ bed	1,987	21,857	19%
9	Plan 2	3 bed	1,609	14,481	16%
5	Plan 1 Market Rate	3 bed	1,230	6,150	25%
9	Plan 1 BMR	3 bed	1,230	11,070	incl
57				98,816	100%

Design Style.

There are five sets of home plans, and all units are two story in design and feature exterior finishes with modern interpretations of classic farmhouse, cottage and craftsmen styles featuring stucco and horizontal and vertical siding, see Figure 4 below for proposed exterior design styles. The 5 home plans will utilize 9 different color schemes and materials consisting of neutral tone colors and materials, see figure 5 below. Most of the elevations feature both horizontal and vertical siding or stucco and siding materials accents. Porch elements are included on all plans and elevations of varying size to promote pedestrian access to the front doors and interaction among residents. Street-facing left-side elevations on lots 4, 8, 12 and 16 have larger windows and additional detailing to further enhance the streetscape.

Figure 4. Proposed Design Style



PLAN 1
Elevation 'B' Cottage
Color Scheme #4

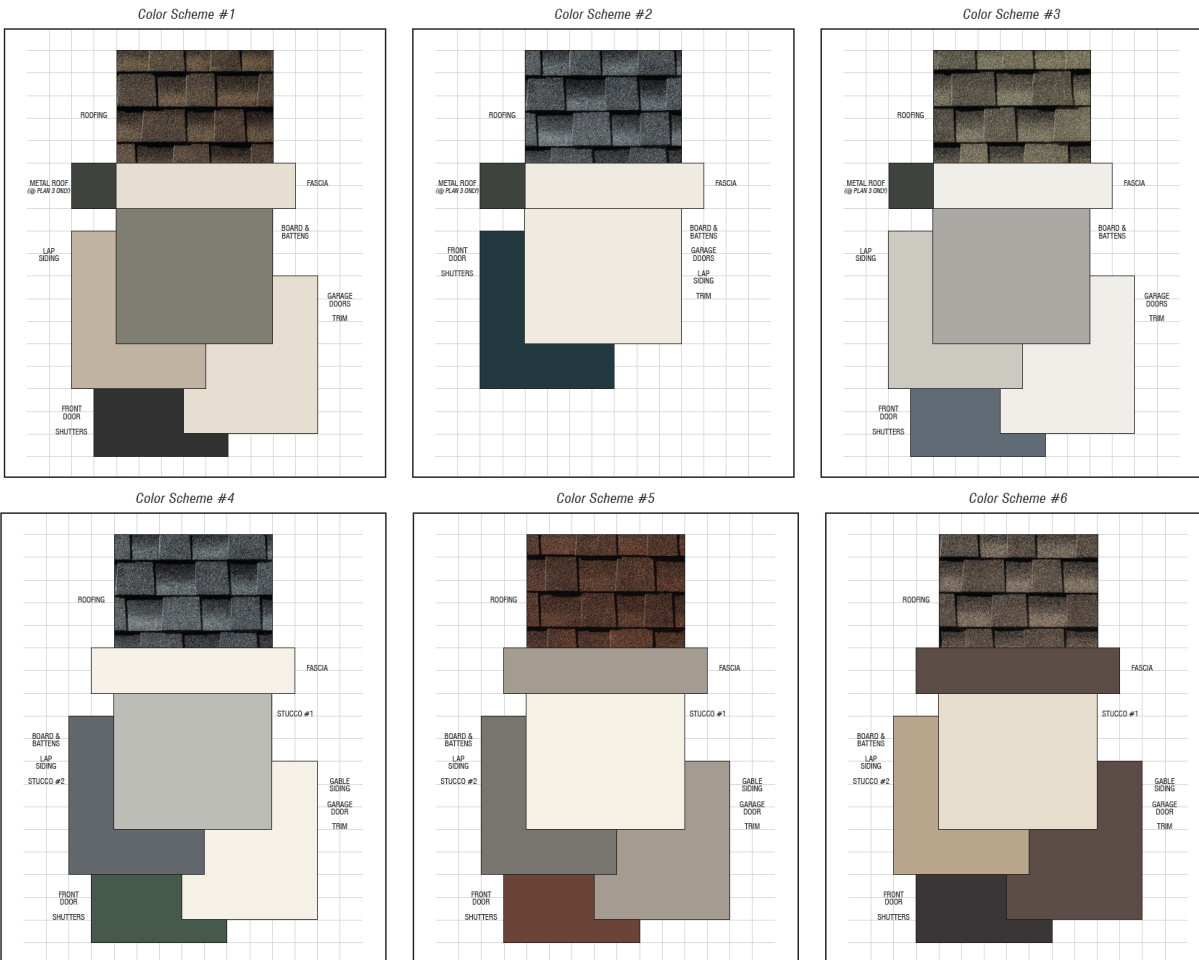
PLAN 2
Elevation 'A' Farmhouse
Color Scheme #3

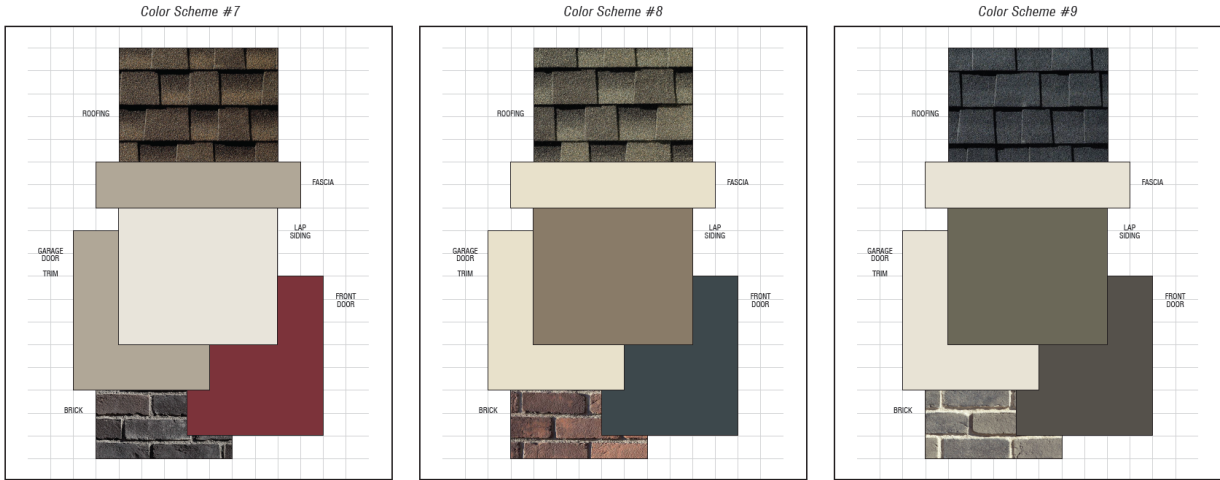
PLAN 3
Elevation 'C' Craftsman
Color Scheme #9

PLAN 4
Elevation 'B' Cottage
Color Scheme #6

PLAN 5
Elevation 'A' Farmhouse
Color Scheme #3

Figure 5. Proposed Colors and Materials





Parking.

Vehicle and bicycle parking for most new homes would be via an enclosed two-car garage, see figure 6 below for proposed parking spaces and access. Each duet unit would have a one-car enclosed garage. There are no driveway aprons proposed so additional on-street guest parking would be provided in designated parking areas throughout the site. The project parking totals 136 parking spaces: 100 covered garage spaces, 34 uncovered “guest” spaces, and two handicap accessible spaces. All homes will include bicycle storage hooks inside the garage on walls or ceiling areas and electric vehicle charging outlets for easy connection of an electric vehicle charger.

Figure 6. Proposed Parking Plan

- (09) PLAN 2 SFD
- (11) PLAN 3 SFD
- (12) PLAN 4 SFD
- (11) PLAN 5 SFD

Total Units: 57 Homes

Circled lot # indicates proposed BMR unit
12 Units Total



Access.

The projects main entrance is from Airport Boulevard, as displayed in figure 6 above, with a secondary Emergency Vehicle Access (EVA) from Old Redwood Highway. Internal circulation would be via a private road 21-feet to 25-feet wide, that will serve as direct access, or shared access via driveway to the proposed new dwellings. No new dwelling units proposed with the project will have direct access onto Old Redwood Highway or Airport Boulevard. Pedestrian access from each home is provided by a concrete path from the front of the home to an interconnected shared walking path or sidewalk within the project.

Setbacks and Building Height.

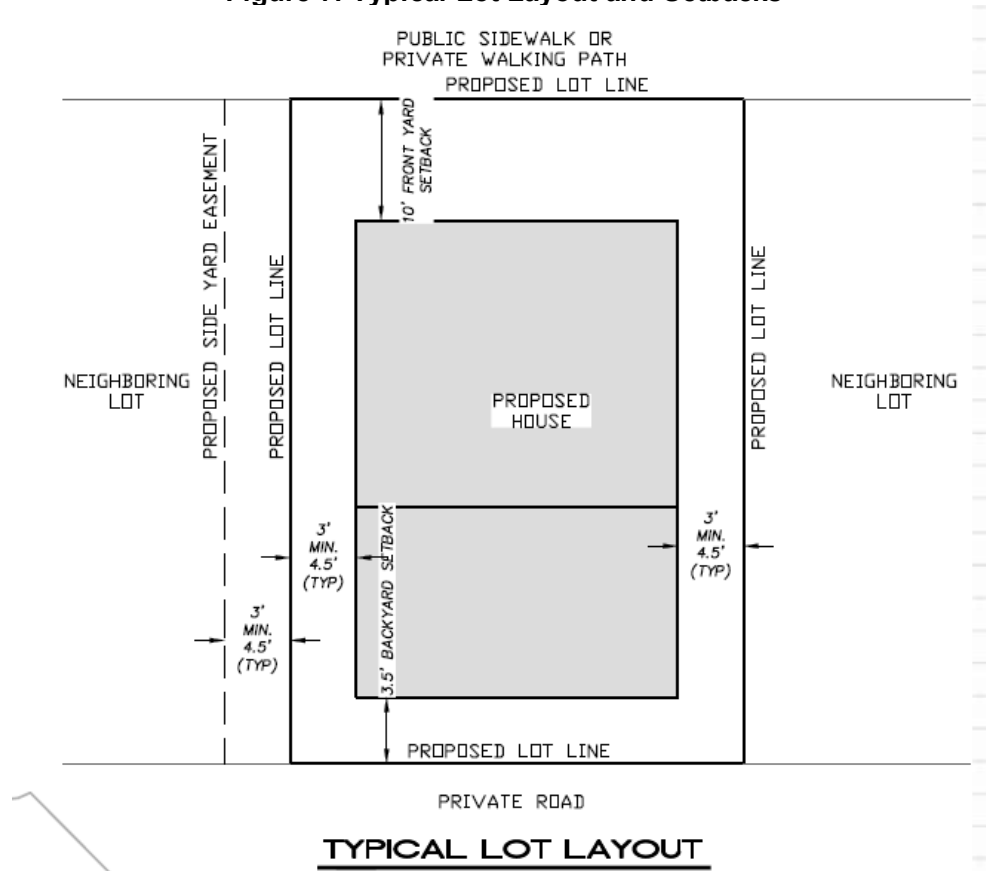
The applicant has proposed to use a “zero lot line” type of layout between the homes. Due to this proposal the outdoor yard spaces will be located between the homes rather than in the rear of the homes. In accordance with State Density Bonus Law (Government Code Section 65915), the applicant requested the waiver or reduction of any development standard that would have the effect of physically precluding the construction of the project at the density permitted with the density bonus. The applicant has submitted a request for a reduction in the following development standards applicable in the Medium Density Residential (R2) Zoning District:

Lot size, Lot width, Minimum front property line setback, Minimum rear setback, Minimum interior side setback, Minimum street side setback, Minimum front street centerline setback, Minimum side street centerline setback, and maximum lot coverage. The concessions in development standards are summarized below in Table 2, and Figure 7 displays what a typical lot in the subdivision will look like.

Table 2. Concessions of Development Standards

Zoning District Development Standards	R2 District Requirements	R3 District Requirements	Proposed Project
Minimum Lot Size	6000 square feet	6000 square feet	1,322 – 3,414 square feet
Minimum Lot Width	60 feet	80 feet	18.34 feet
Front Street Centerline Setback	45 feet	45 feet	13.4 feet
Street Centerline Setback	45 feet	45 feet	17 feet
Front Property Line Setback	20 feet	15 feet	10 feet
Street Side Setback	20 feet	15 feet	3.5 feet
Rear Property Line Setback	20 feet	10 feet	3.5 feet
Interior Side Setback	5 feet	5 feet	3 feet

Figure 7. Typical Lot Layout and Setbacks



Sewage Disposal.

Sewage disposal will be provided by the Larkfield Wikiup Sanitation operated by Sonoma Water (Sonoma County Water Agency).

Water Supply.

Water service will be provided by the Cal American Water district.

Construction.

The project proposes to construct a total of 57 new housing units of which 12 are designated affordable housing units. Since the project proposes affordable housing units Sonoma County Zoning Code Section 26-89-070 (A)(1) – Design and Construction Standards for Affordable Housing (Timing of Construction) applies and requires *“Affordable units shall be constructed concurrently with the other units in the project. Where construction phasing is necessary, each phase shall provide the same ratio of lower-or moderate income units to the market rate or other unrestricted units in the phase as that required for the development as a whole”*. The project is proposed to be built out over 5-7 phases depending on lender and market conditions where the above would apply. The applicants have requested as a part of their Density Bonus a concession on the “Timing of Construction” for Affordable Housing Zoning Code standard based on hardship. Construction will occur over 5-7 phases and is expected to provide a minimum of one (1) below- market rate unit with every 8 homes constructed in the project with the exception of the first phase containing just the 3-4 model homes.

IV. SETTING

The proposed subdivision and planned development project is a residential infill, 57 unit 'for sale' residential development project located in a mixed-use neighborhood in the unincorporated area of northeast Santa Rosa. Subject parcel -028 has a base zoning district of Medium Density Residential (R2) with a density of 9 dwelling units per acre, with combining districts of Affordable Housing (AH) and Valley Oak Habitat (VOH) Combining Districts. Subject parcel -026 has a base zoning district of High Density Residential (R3) with a density of 20 dwelling units per acre and combining district of Valley Oak Habitat (VOH). Subject parcel -028 has a General Plan Land Use designation of Urban Residential (UR) with a density of 9 dwelling units per acre and subject parcel -026 has a general plan land use designation of Urban Residential (UR) with a density of 20 dwelling units per acre.

The project is not located in a high fire hazard or a wildland urban interface area. The site is served by the Sonoma County Fire Protection District County Station Number 2, located at 207 Todd Road, Santa Rosa, which is approximately 1 mile from the project site.

The site is currently vacant within an urbanized area. The surrounding uses include residential development and a gas station to the north, mobile home park development to the east, general commercial development to the south, and multi-family development to the east. The site topography is generally flat except for a large dirt stockpile located at the center of the site. Overhead power lines are located along both frontages. The site has frontages on both Airport Boulevard and Old Redwood Highway and there are no existing frontage improvements on either side.

The site is within the Santa Rosa Plain and is subject to the Santa Rosa Plain Conservation Strategy, however the site is located outside of the designated Critical Habitat Area. Undeveloped portions of the Santa Rosa Plain can be characterized by vernal pools, seasonal wetlands, and associated grasslands. These habitats can support a unique population of the State and federally listed California tiger salamander, and three State and federally listed endangered plant species that have a large proportion of their population on the Plain. Additionally, the site is a Groundwater Class 1 – Major Groundwater Basin, located within the Santa Rosa Plain Priority Groundwater Basin.

V. ISSUES RAISED BY THE PUBLIC OR AGENCIES

A referral packet was drafted and circulated on July 6, 2023 to inform and solicit comments from selected relevant local, state and federal agencies, local Tribes, neighbors within 300-feet of the project site; and to special interest groups that were anticipated to take interest in the project. Comments were received from:

- Permit Sonoma Survey
- Permit Sonoma Building Division
- Permit Sonoma Fire Prevention
- Permit Sonoma Natural Resources Division
- Permit Sonoma Sanitation Section
- Permit Sonoma Grading and Stormwater Section
- Sonoma County Public Infrastructure
- Sonoma County Water Agency
- Northwest Information Center

Referral Agency comments included recommended mitigation measures and standard conditions of approval for the project.

Assembly Bill 52 Project Notifications were sent to the Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Torres Martinez Desert Cahuilla Indians, Mishewal Wappo Tribe of Alexander Valley, Middletown Rancheria Band of Pomo Indians, Lytton Rancheria of

California, Kashia Pomos Stewarts Point Rancheria and Federated Indians of Graton Rancheria. No Tribe requested formal consultation on the proposed project.

No Public Comments on the proposed project have been received to date.

On December 20, 2023, the County of Sonoma Design Review Committee (DRC) held a public meeting on the project. The DRC provided recommendations for project site layout and access, house design and exterior colors / materials, landscaping, and exterior lighting.

No written public comment has been received to date about the project.

VI. EVALUATION OF ENVIRONMENTAL IMPACTS

The following sections analyze 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.

Less Than Significant with Mitigation Incorporated: 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 Lennox Homes, 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 site is not in an area designated as visually sensitive by the Sonoma County General Plan. Using the County's Visual Assessment Guidelines (Attachment 3), the projects Site Sensitivity can be characterized as Low, because the project site is located within an urban land use designation (-028 UR 9 and -026 UR 20) and the site is not zoned with a combining district for protecting scenic

resources. Additionally, the surrounding vicinity to the project site can be characterized as urban development with an urban land use designation and general commercial land use designations. The project site is not located on a prominent ridgeline and has no significant natural vegetation of aesthetic value to the surrounding community.

On December 20, 2023, the County of Sonoma Design Review Committee (DRC) held a public meeting on the project. The DRC provided recommendations on project site layout and access, house design and exterior colors / materials, landscaping, and exterior lighting. The DRC supported the preliminary design preliminary design review proposal with a 3-0-0 vote and recommended the applicant consider addressing the following design review comments:

LANDSCAPING

- Submit complete landscaping planting and irrigation plan for final design review consideration.
- Consider removing rosemary from the proposed plant palette to soften fire impacts.

COLORS / MATERIALS

- Submit complete color and materials pallet for final design review consideration.
- The Committee raises attention regarding owner use and enjoyment of private yard areas shared with large blank facades of adjacent units.
 - a. Consider opportunities for allowing use of adjoining façade exteriors to support accessory landscape trellising, lighting, or other decorative installations.
 - b. Consider incorporating an exterior band-like material across the mid-elevation of the façade to break up the vertical massing, or to support minor mounting opportunities.

LIGHTING

- Consider use of a more traditional or decorative wall sconce design over garage frontages
- Consider garage LED fixtures with options for a warmer color temperature of 3000k or less.
- Submit complete lighting plans and fixture cut sheets for final design review consideration.

SIGNAGE

- Submit plans for any monument signage proposed as part of the subdivision for final design review consideration.

The applicant has indicated their intent to address the DRC comments as part of their final design action, subsequent to Planning Commission action on the Major Subdivision and Use Permit applications. To ensure DRC comments are addressed and the project complies with the Sonoma County Design Review Ordinance (Chapter 26, Article 82), a standard condition of approval requires the project return to the DRC for review and approval of final design plans for building, colors and materials, landscaping, exterior lighting, and parking prior to issuance of any grading or building permit.

Significance Level:

Less than Significant Impact.

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

Comment:

The project is not located on a site visible from a state scenic highway and is not within the HD (Historic District) combining district. The project will involve the removal of 19 out of the 25 trees documented onsite, however the trees proposed for removal are not located within state scenic highway, (See attachment 4)

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:

As discussed in Section 1 (a) above, a standard condition of approval has been incorporated into the project that requires the site plan, building elevations, walls and fences, signage, lighting plan, landscaping and irrigation plans receive final design review approval by the Design Review Committee to ensure compliance with the Sonoma County Design Review Ordinance. Additionally, the site is in an urbanized area surrounded by existing mixed-use development and is designated as an Urban Land Use in the Sonoma County General Plan. The site is not zoned for any Scenic Resource Combining District or Local Area Development Guidelines.

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 will add new structures to the site and thus introduce new sources of light and glare, see figure 8 below for lighting study (see also Attachment 5). The County's Design Review Ordinance (Chapter 26, Article 82) minimizes the impact of new development by required exterior lighting is design to prevent glare, and preclude the trespass of light onto adjoining properties and into the night sky. Impacts would be reduced to less than significant by requiring all exterior lighting on the proposed future development to be Dark Sky compliant or a similar certification as described in the mitigation measure below.

Figure 8. Lighting Study



Significance Level:
Less than Significant with Mitigation Incorporated.

Mitigation Measure VIS-1:

Prior to issuance of building permits, an exterior lighting plan shall be submitted for design review (by PRMD or Design Review Committee). 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. Flood lights are not permitted. All parking lot and street lights shall be full cut-off fixtures. Lighting shall shut off automatically after closing and security lighting shall be motion sensor activated.

Mitigation Monitoring VIS-1:

The Permit and Resource Management Department shall not issue the Building Permit until an exterior night lighting plan has been submitted that is consistent with the approved plans and County standards. The Permit and Resource Management Department 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, the Permit and Resource Management Department shall conduct a site inspection and require the property be brought into compliance or initiate procedures to revoke or

modify the permit. (Ongoing)

2. AGRICULTURE AND FOREST RESOURCES:

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

Would the project:

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

Comment:

The project site is not designated as Prime or Unique Farmland, or Farmland of Statewide Importance on the Important Farmland maps¹. It is designated as Urban Lands, and the surrounding properties reflect an urbanized landscape with a lack of significant agricultural operations in the area.

Significance Level: No Impact.

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

Comment:

The project site is zoned R2 (Medium Density Residential) and R3 (High Density Residential, with no immediate surrounding properties zoned for agricultural use. The R2 and R3 zoning Districts allow for Subdivision and Planned Developments. The project site is not subject to a Williamson Act Contract and is not expected to conflict with zoning for agricultural use or lands under a Land Conservation 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 is not forest land, is not zoned Timberland Production (TP), or located near forest land or lands zoned TP. Therefore, the project will not conflict with or have any effect on forest lands or lands zoned TP.

Significance Level:

No Impact.

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

¹ California Department of Conservation, "Sonoma County Important Farmland 2016", April 2018, <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Sonoma.aspx>

Comment:

See the comment under section 2(c) above.

Significance Level:

No Impact.

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

Comment:

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

Significance Level:

No Impact.

3. AIR QUALITY:

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

Would the project:

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

Comment:

The project is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD), which is currently designated as a nonattainment area for state and federal ozone standards, the state PM 10 standard, and the state and federal PM 2.5 standard. The District has adopted an Ozone Attainment Plan and a Clean Air Plan in compliance with Federal and State Clean Air Acts. These plans include measures to achieve compliance with both ozone standards. The plans deal primarily with emissions of ozone precursors (nitrogen oxides (NOx) and volatile organic compounds, also referred to as Reactive Organic Gases (ROG)). The project will not conflict with the District's air quality plans because the proposed use is well below the emission thresholds for ozone precursors or involve construction of transportation facilities that are not addressed in an adopted transportation plan (see discussion in 3 (b) below).

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 current 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.

The project proposes 57 new dwelling units. Based on its size, the proposed project is below the single-family land use construction-related screening size of 114 dwelling units and the operation criteria pollutant screening size of 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 with Mitigation Incorporated.

Mitigation Measure AIR-1:

All development facilitated by the project on the Rezoning Sites (regardless of whether the development is under the jurisdiction of the NSCAPCD or the BAAQMD) shall be required to reduce construction emissions of reactive organic gases, nitrogen oxides, and particulate matter (PM10 and PM2.5) by implementing the BAAQMD's Basic Construction Mitigation Measures (described below) or equivalent, expanded, or modified measures based on project and site-specific conditions.

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day, with priority given to the use of recycled water for this activity.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping shall be prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 mph.
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
8. A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.
9. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.
10. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
11. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks shall have at maximum 50 percent air porosity.
13. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
14. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
15. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
16. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel.
17. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.
18. Minimizing the idling time of diesel powered construction equipment to two minutes.
19. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NOX reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.
20. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).
21. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM.
22. Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.

Mitigation Monitoring AIR-1:

Permit Sonoma staff shall verify that the AIR-1 measures are noted on the subdivision map prior to recordation and on subsequent site alteration, grading, building, and subdivision improvement plans prior to issuance of permits.

- c) Expose sensitive receptors to substantial pollutant concentrations?

Comment:

Sensitive receptors are facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Hospitals, schools, convalescent facilities, and residential areas are examples of sensitive receptors. Localized impacts to sensitive receptors generally occur when sources of air pollutants and sensitive receptors are located near one another. The project would not expose these sensitive receptors to significant concentrations of pollutants because of the analysis above in 3(b). The proposed project would not create an

incompatible situation as neither the residential use of the project site nor the neighboring uses involve stationary or point sources of air pollutants which generate substantial pollutant concentrations. Although there will be no significant long-term increase in emissions, during construction of future build-out there could be significant short-term dust emissions that would affect nearby residents. Dust emissions can be reduced to less than significant by Mitigation Measure AIR-1.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation Measure:

See Mitigation Measure AIR-1.

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 according to the BAAQMD's 2022 CEQA Air Quality Guidelines, nor located near an odor generating source that may affect the use and would have no odor impact.

Significance Level:

No Impact.

4. BIOLOGICAL RESOURCES:

Regulatory Framework

The following discussion identifies federal, state and local environmental regulations that serve to protect sensitive biological resources relevant to the California Environmental Quality Act (CEQA) review process.

Federal

Federal Endangered Species Act (FESA)

FESA establishes a broad public and federal interest in identifying, protecting, and providing for the recovery of threatened or endangered species. The Secretary of Interior and the Secretary of Commerce are designated in FESA as responsible for identifying endangered and threatened species and their critical habitat, carrying out programs for the conservation of these species, and rendering opinions regarding the impact of proposed federal actions on listed species. The USFWS and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries) are charged with implementing and enforcing the FESA. USFWS has authority over terrestrial and continental aquatic species, and NOAA Fisheries has authority over species that spend all or part of their life cycle at sea, such as salmonids.

Section 9 of FESA prohibits the unlawful "take" of any listed fish or wildlife species. Take, as defined by FESA, means "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such action." USFWS's regulations define harm to mean "an act which actually kills or injures wildlife." Such an act "may include "significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering" (50 CFR § 17.3). Take can be permitted under FESA pursuant to sections 7 and 10. Section 7 provides a process for take permits for federal projects or projects subject to a federal permit, and Section 10 provides a process for incidental take permits for projects without a federal nexus. FESA does not extend the take prohibition to federally listed plants on private land, other than prohibiting the

removal, damage, or destruction of such species in violation of state law.

The Migratory Bird Treaty Act of 1918 (MBTA)

The U.S. MBTA (16 USC §§ 703 et seq., Title 50 Code of Federal Regulations [CFR] Part 10) states it is “unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill; attempt to take, capture or kill; possess, offer for sale, sell, offer to barter, barter, offer to purchase, purchase, deliver for shipment, ship, export, import, cause to be shipped, exported, or imported, deliver for transportation, transport or cause to be transported, carry or cause to be carried, or receive for shipment, transportation, carriage, or export any migratory bird, any part, nest, or egg of any such bird, or any product, whether or not manufactured, which consists, or is composed in whole or in part, of any such bird or any part, nest or egg thereof...” In short, under MBTA it is illegal to disturb a nest that is in active use, since this could result in killing a bird, destroying a nest, or destroying an egg. The USFWS enforces MBTA. The MBTA does not protect some birds that are non-native or human-introduced or that belong to families that are not covered by any of the conventions implemented by MBTA. In 2017, the USFWS issued a memorandum stating that the MBTA does not prohibit incidental take; therefore, the MBTA is currently limited to purposeful actions, such as directly and knowingly removing a nest to construct a project, hunting, and poaching.

The Clean Water Act (CWA)

The CWA is the primary federal law regulating water quality. The implementation of the CWA is the responsibility of the U.S. Environmental Protection Agency (EPA). However, the EPA depends on other agencies, such as the individual states and the U.S. Army Corps of Engineers (USACE), to assist in implementing the CWA. The objective of the CWA is to “restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” Section 404 and 401 of the CWA apply to activities that would impact waters of the U.S. The USACE enforces Section 404 of the CWA and the California State Water Resources Control Board enforces Section 401.

Section 404.

As part of its mandate under Section 404 of the CWA, the EPA regulates the discharge of dredged or fill material into “waters of the U.S.”. “Waters of the U.S. include territorial seas, tidal waters, and non-tidal waters in addition to wetlands and drainages that support wetland vegetation, exhibit ponding or scouring, show obvious signs of channeling, or have discernible banks and high-water marks. Wetlands are defined as those areas “that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support a prevalence of vegetation typically adapted for life in saturated soil conditions” (33 CFR 328.3(b)). The discharge of dredged or fill material into waters of the U.S. is prohibited under the CWA except when it is in compliance with Section 404 of the CWA. Enforcement authority for Section 404 was given to the USACE, which it accomplishes under its regulatory branch. The EPA has veto authority over the USACE’s administration of the Section 404 program and may override a USACE decision with respect to permitting. Substantial impacts to waters of the U.S. may require an Individual Permit’s Projects that only minimally affect waters of the U.S. may meet the conditions of one of the existing Nationwide Permits, provided that such permit’s other respective conditions are satisfied. A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for Section 404 permit actions (see below).

Section 401.

Any applicant for a federal permit to impact waters of the U.S. under Section 404 of the CWA, including Nationwide Permits where pre-construction notification is required, must also provide to the USACE a certification or waiver from the State of California. The “401 Certification” is provided by the State Water Resources Control Board through the local Regional Water Quality Control Board (RWQCB). The RWQCB issues and enforces permits for discharge of treated water, landfills, storm-water runoff, filling of any surface waters or wetlands, dredging, agricultural activities and wastewater recycling. The RWQCB recommends the “401 Certification” application be made at the same time that any applications are

provided to other agencies, such as the USACE, USFWS, or NOAA Fisheries. The application is not final until completion of environmental review under the CEQA. The application to the RWQCB is similar to the pre-construction notification that is required by the USACE. It must include a description of the habitat that is being impacted, a description of how the impact is proposed to be minimized and proposed mitigation measures with goals, schedules, and performance standards. Mitigation must include a replacement of functions and values, and replacement of wetland at a minimum ratio of 2:1, or twice as many acres of wetlands provided as are removed. The RWQCB looks for mitigation that is on site and in-kind, with functions and values as good as or better than the water-based habitat that is being removed.

State

California Endangered Species Act (CESA)

Provisions of CESA protect state-listed threatened and endangered species. The CDFW is charged with establishing a list of endangered and threatened species. CDFW regulates activities that may result in “take” of individuals (i.e., “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”). Habitat degradation or modification is not expressly included in the definition of “take” under the California Fish and Game Code (CFGC), but CDFW has interpreted “take” to include the killing of a member of a species which is the proximate result of habitat modification.

Fish and Game Code 1600-1602

Sections 1600-1607 of the CFGC require that a Notification of Lake or Streambed Alteration Agreement (LSAA) application be submitted to CDFW for “any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake.” CDFW reviews the proposed actions in the application and, if necessary, prepares a LSAA that includes measures to protect affected fish and wildlife resources, including mitigation for impacts to bats and bat habitat.

Nesting Birds

Nesting birds, including raptors, are protected under CFGC Section 3503, which reads, “It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” In addition, under CFGC Section 3503.5, “it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto”. Passerines and non-passerine land birds are further protected under CFGC 3513. As such, CDFW typically recommends surveys for nesting birds that could potentially be directly (e.g., actual removal of trees/vegetation) or indirectly (e.g., noise disturbance) impacted by project-related activities. Disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “take” by CDFW.

Non-Game Mammals

Sections 4150-4155 of the CFGC protects non-game mammals, including bats. Section 4150 states “A mammal occurring naturally in California that is not a game mammal, fully protected mammal, or fur-bearing mammal is a nongame mammal. A non-game mammal may not be taken or possessed except as provided in this code or in accordance with regulations adopted by the commission”. The non-game mammals that may be taken or possessed are primarily those that cause crop or property damage. Bats are classified as a non-game mammal and are protected under the CFGC.

California Fully Protected Species and Species of Special Concern

The classification of “fully protected” was the CDFW’s initial effort to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish,

amphibians and reptiles, birds, and mammals. Most of the species on these lists have subsequently been listed under CESA and/or FESA. The Fish and Game Code sections (fish at §5515, amphibians and reptiles at §5050, birds at §3503 and §3511, and mammals at §4150 and §4700) dealing with “fully protected” species state that these species “...may not be taken or possessed at any time and no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to take any fully protected species,” although take may be authorized for necessary scientific research. This language makes the “fully protected” designation the strongest and most restrictive regarding the “take” of these species. In 2003, the code sections dealing with “fully protected” species were amended to allow the CDFW to authorize take resulting from recovery activities for state-listed species.

California Species of Special Concern (CSC) are broadly defined as animals not listed under the FESA or CESA, but which are nonetheless of concern to the CDFW because they are declining at a rate that could result in listing or because they historically occurred in low numbers and known threats to their persistence currently exist. This designation is intended to result in special consideration for these animals by the CDFW, land managers, consulting biologists, and others, and is intended to focus attention on the species to help avert the need for costly listing under FESA and CESA and cumbersome recovery efforts that might ultimately be required. This designation also is intended to stimulate collection of additional information on the biology, distribution, and status of poorly known at-risk species, and focus research and management attention on them. Although these species generally have no special legal status, they are given special consideration under the CEQA during project review.

Porter-Cologne Water Quality Control Act

The intent of the Porter-Cologne Water Quality Control Act (Porter-Cologne) is to protect water quality and the beneficial uses of water, and it applies to both surface and ground water. Under this law, the State Water Resources Control Board develops statewide water quality plans, and the RWQCBs develop basin plans that identify beneficial uses, water quality objectives, and implementation plans. The RWQCBs have the primary responsibility to implement the provisions of both statewide and basin plans. Waters regulated under Porter-Cologne, referred to as “waters of the State,” include isolated waters that are not regulated by the USACE. Projects that require a USACE permit, or fall under other federal jurisdiction, and have the potential to impact waters of the State are required to comply with the terms of the Water Quality Certification Program. If a proposed project does not require a federal license or permit, any person discharging, or proposing to discharge, waste (e.g., dirt) to waters of the State must file a Report of Waste Discharge and receive either waste discharge requirements (WDRs) or a waiver to WDRs before beginning the discharge.

Local

Sonoma County General Plan

The *Sonoma County General Plan 2020* Land Use Element and Open Space & Resource Conservation Element both contain policies to protect natural resource lands including, but not limited to, watershed, fish and wildlife habitat, biotic areas, and habitat connectivity corridors.

Riparian Corridor Ordinance

The RC combining zone is established to protect biotic resource communities, including critical habitat areas within and along riparian corridors, for their habitat and environmental value, and to implement the provisions of the General Plan Open Space and Resource Conservation and Water Resources Elements. These provisions are intended to protect and enhance riparian corridors and functions along designated streams, balancing the need for agricultural production, urban development, timber and mining operations and other land uses with the preservation of riparian vegetation, protection of water resources, floodplain management, wildlife habitat and movement, stream shade, fisheries, water quality, channel stability, groundwater recharge, opportunities for recreation, education and aesthetic appreciation and other riparian functions and values.

Valley Oak Habitat (VOH) Combining District

The VOH combining district is established to protect and enhance valley oaks and valley oak woodlands and to implement the provisions of *Sonoma County General Plan 2020* Resource Conservation Element Section 5.1. Design review approval may be required of projects in the VOH, which would include measures to protect and enhance valley oaks on the project site, such as requiring that valley oaks shall comprise a minimum of fifty percent (50%) of the required landscape trees for the development project.

Sonoma County Tree Protection Ordinance

The Sonoma County Tree Protection Ordinance (Sonoma County Code of Ordinances, Chapter 26, Article 88, Sec. 26-88-010 [m]) establishes policies for protected tree species in Sonoma County. Protected trees are defined (Chapter 26, Article 02, Sec. 26- 02-140) as the following species: big leaf maple (*Acer macrophyllum*), black oak (*Quercus kelloggii*), blue oak (*Quercus douglasii*), coast live oak (*Quercus agrifolia*), interior live oak (*Quercus wislizenii*), madrone (*Arbutus menziesii*), oracle oak (*Quercus morehus*), Oregon oak (*Quercus garryana*), redwood (*Sequoia sempervirens*), valley oak (*Quercus lobata*), California bay (*Umbellularia californica*), and their hybrids.

Project Analysis

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:

The project site is primarily composed of ruderal herbaceous habitat; this is likely due to the past presence of buildings, asphalt driveways and parking areas, and cars onsite which altered the native plant community. Dominant non-native grasses observed on the project site include Italian rye grass (*Festuca perennis*), slender wild oat (*Avena barbata*) and Harding grass (*Phalaris aquatica*). Dominant non-native forbs are blue sailors (*Cichorium intybus*), bristly ox-tongue (*Helminthotheca echioides*), Queen Anne's lace (*Daucus carota*), salsify (*Tragopogon porrifolius*), sharp point fluellin (*Kickxia elatine*) and the highly invasive stinkwort (*Dittrichia graveolens*). Himalayan blackberry (*Rubus armeniacus*) was also present in the uplands on the western portion of the project site. Very few native, herbaceous species are found on the project site. The only upland native species found in the ruderal community were summer cottonweed (*Epilobium brachycarpum*) and hayfield tarweed (*Hemizonia congesta luzulifolia*).

Animals observed or expected to occur in ruderal herbaceous habitats are typically those species adapted to human disturbance such as the following species observed on the project site: European Starling (*Sturnus vulgaris*), Northern Flicker (*Colaptes auratus*), Turkey Vulture (*Cathartes aura*), Killdeer (*Charadrius vociferus*), Black Phoebe (*Sayornis nigricans*), American Crow (*Corvus brachyrhynchos*), and Brewer's Blackbird (*Euphagus cyanocephalus*).

A few seasonal wetlands are interspersed throughout the site. These seasonal wetlands have been disturbed over the years due to land uses and are dominated primarily by non-native wetland species including Mediterranean barley (*Hordeum marinum* ssp. *gussoneanum*), prostrate knotweed (*Polygonum aviculare*), Italian rye grass (*Festuca perennis*), prickly lettuce (*Lactuca serriola*), curly dock (*Rumex crispus*), English plantain (*Plantago lanceolata*), tall flatsedge (*Cyperus eragrostis*), rabbit's foot grass (*Polypogon monspeliensis*), hyssop loosestrife (*Lythrum hyssopifolia*), bristly ox-tongue (*Helminthotheca echioides*) and some spikerush (*Eleocharis* sp.).

Seasonal wetlands provide wildlife with a seasonal water source that allows animals to drink and

forage in the water during the winter and spring months. Sierran tree frogs (*Pseudacris sierra*) complete their aquatic life cycle in the project site's wetlands, as do a number of aquatic invertebrates including insects. The seasonal wetlands onsite do not persist long enough for amphibians that require a longer hydroperiod to complete their aquatic life cycle; for example, the California tiger salamander (*Ambystoma californiense*) requires inundated conditions, typically 12 inches deep or greater, through the month of May in order for the larvae to metamorphose into its terrestrial salamander life stage. This persistent aquatic habitat is not provided on the project site.

On April 5, 2022, Monk & Associates (M&A) Principal Biologist Ms. Sarah Lynch conducted a reconnaissance survey of the project site to record biological resources, compose project species lists (plants and wildlife) and to assess the status of likely resource agency-regulated areas on the project site. The entire project site was walked on foot. M&A Project Biologist, Ms. Monica Matthews, along with Ms. Lynch, conducted a wetland delineation on September 29, 2022 to assess the presence of wetlands and other water features located on the project site.

The assessment (see attachment 6) determined a total of 12 special-status plant species and a total of 6 special-status wildlife species are known to occur in the region of the project site. At the time of the field surveys, no special-status species were observed within the studied area.

Special-status Plant Species

Of the twelve plants listed in the CNDDDB for the project vicinity, eleven of these special-status plants require specialized habitats which are not present on the project site, including vernal pools, marshes, broadleaved forests, chaparral, and coniferous forest. The twelve plant species include; Sonoma sunshine; Pappose tarplant; White seaside tarplant; Burke's goldfields; Dwarf downingia; Napa false indigo; Pitkin Marsh lily; Sebastopol meadowfoam; Jepson's leptosiphon; Baker's navarretia; Many-flowered navarretia; and Narrow-anthered California brodiaea. None of these twelve plants, in total, have been noted on the project site during surveys. Given the results of the protocol-level survey conducted by M&A, there is a low possibility of impacts to these special status plant species because they do not occur on the project nor provide the specialized habitat required by the species. However, to ensure there are no impacts on special status plant species, mitigation measures for Special Status Plant Species avoidance, minimization, habitat restoration and monitoring, and habitat compensation have been incorporated into the project under Mitigation Measures BIO-1 and BIO-2.

Special-status Wildlife Species

A total of 6 special-status wildlife species are known to occur in the region of the project site. These species include; Coho Salmon; California tiger salamander; Red-bellied newt; Foothill yellow-legged frog; Western pond turtle; and Western Burrowing Owl. Of these six species, four rely on highly specialized habitats including riverine aquatic habitats that are not present on the project site. No special-status animals have ever been mapped on or adjacent to the project site.

Though California tiger salamanders rely on highly specialized habitat such as vernal pools and seasonal wetland habitats that hold water until late-May, which are not present on the project site, the species is discussed below as it is a focal species for CDFW for Sonoma County projects. Similarly, the Western Burrowing Owl (*Athene cunicularia hypugaea*), though unlikely to occur on the project site due to an absence of suitable habitat and nesting records in the county, is also discussed below as this is also a CDFW focal species for Sonoma County projects. The remaining species, foothill yellow-legged frog (*Rana boylei*), red-bellied newt (*Taricha rivularis*), western pond turtle (*Emys marmorata*), and Coho salmon (*Oncorhynchus kisutch*) are not expected on the project site due to an absence of suitable habitat.

California Tiger Salamander

The California tiger salamander (CTS) is a federally listed endangered species and a State-listed threatened species under the CESA. California tiger salamanders occur in grasslands and open oak

woodlands that provide suitable overwintering and/or breeding habitats. California tiger salamanders spend the majority of their lives underground. They typically only emerge from their subterranean refugia for a few nights each year during rainfall events typically in late October through December to migrate to breeding ponds where they lay eggs. After spending up to a few weeks and sometimes longer in breeding ponds the adult salamanders then return to their subterranean overwintering refugia not to resurface until the following breeding season.

Young hatch typically in February and March and metamorphose leaving natal ponds in search of subterranean refugia typically in late April and May. Deep, seasonal and sometimes perennial wetlands typically provide most of the breeding habitat used by California tiger salamanders. California tiger salamanders attach their eggs to rooted, emergent vegetation, and other stable filamentous objects in the water column. Eggs are gelatinous and are laid singly or occasionally in small clusters. Eggs range in size from about three-quarters ($\frac{3}{4}$) the diameter of a dime to the full diameter of a dime. Typically, seasonal breeding pools must hold water into the month of May to allow enough time for larvae to fully metamorphose. Pools that are 16 inches or deeper in the peak winter months usually will remain inundated long enough to provide good breeding conditions for California tiger salamanders. Optimal pools are typically deeper than 16 inches consistently in most winters. One reason deeper pools are generally better for larval development is because the water remains cooler. Shallow pools are warmed faster by the sun, evaporate more quickly becoming smaller and more prone to successful predation, and most importantly, warmer water carries less free oxygen which is necessary for California tiger salamander larvae to mature and metamorphose. With ample free oxygen in the water, California tiger salamander larvae are able to reach full metamorphosis even with partially to fully absorbed gills.

Shallow pools are not optimal California tiger salamander breeding sites. Pools that are as shallow as 10 to 12 inches may still attract breeding salamanders, but young do not often successfully metamorphose from such pools except in years exhibiting wet springs. In dry years, seasonal wetlands, especially shallower pools, may dry too early to allow enough time for California tiger salamander larvae to successfully metamorphose. As pools dry down to very small areas of inundation, California tiger salamander larvae become concentrated and are particularly susceptible to predation. In Cotati, Ms. Lynch observed drying pool predation of larvae by red-sided garter snakes (*Thamnophis sirtalis infernalis*). Similarly, ducks (various spp.) are often observed preying breeding pools. In duck-ravaged pools, larvae may be concentrated in deeper water or are found in areas along the pool margins where pools remain relatively deep and there is dense emergent vegetation. When pools dry too soon, desiccated California tiger salamander larvae can be found, but owing to scavengers usually disappear within a day or two.

Adult California tiger salamanders have been observed up to 2,092 meters (1.3 miles) from breeding ponds (USFWS 2004). The closest known CNDDDB record (CNDDDB Occurrence No. 8) for the California tiger salamander to the project site is located approximately 2.6 miles to the southwest at the Alton Lane Mitigation Site. This record resulted from the translocation of California tiger salamander larvae from the Wright Conservation Site to the man-made pools at the Alton Lane Mitigation Site circa 1990-91. Alton Lane Mitigation Site is a former vineyard that was restored into a vernal pool complex in 1989-1992. California tiger salamander adults were also translocated to the Alton Lane Mitigation Site by CDFW (then CDFG) from an M&A salvage project in Cotati immediately west of Highway 101 and north of Highway 116. The distance of 2.6 miles is much greater than the recorded distance of 1.3 miles that a California tiger salamander is known to migrate.

The project site is located in an area of the Santa Rosa Plain that is listed as "Potential for CTS and listed plants" on the Santa Rosa Plain Conservation Strategy Map, Figure 10. However on January 17, 2023, M&A Principal Biologist Ms. Sarah Lynch spoke with Mr. Ryan Olah, Chief of the USFWS' Coast, Bay, Delta Branch, who confirmed that the USFWS does not consider the 175 Airport Boulevard project site to be suitable or occupied habitat for California tiger salamanders; Mr. Olah confirmed this in a January 26, 2023, email. This statement is based on several factors: (1) The property is located in a developed neighborhood and is completely surrounded by development; (2) The closest known CTS record is located at Alton Lane (2.6 miles to the southwest and on the

opposite side of Highway 101); (3) The property does not provide any breeding habitat, only very shallow seasonal wetlands are onsite that have been modified by site development/redevelopment for decades; (4) The property is located outside designated critical habitat. Therefore, based on all of the above, the project is not expected to impact the California tiger salamander.

Western Burrowing Owl

The Western Burrowing Owl is a California “species of special concern.” Its nest, eggs, and young are also protected under California Fish and Game Code (§3503 and §3503.5) and it is protected under the federal Migratory Bird Treaty Act. This owl has no special federal listing status.

Burrowing owl habitat is usually found in annual and perennial grasslands, characterized by low-growing vegetation. Often, the Burrowing Owl utilizes rodent burrows, typically California ground squirrel burrows, for nesting and cover. They may also on occasion dig their own burrows or use man-made objects such as concrete culverts or rip-rap piles for cover. They exhibit high site fidelity, reusing burrows year after year. Occupancy of suitable Burrowing Owl habitat can be verified at a site by observation of these owls during the spring and summer months or, alternatively, its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement (white wash) at or near a burrow. Burrowing owls typically are not observed in grasslands with tall vegetation or wooded areas because the vegetation obscures their ability to detect avian and terrestrial predators. Since Burrowing Owls spend the majority of their time sitting at the entrances of their burrows, grazed grasslands seem to be their preferred habitat because it allows them to view the world at 360 degrees without obstructions.

One adult Western Burrowing Owl was identified 2.6 miles west of the project site in the winter of 2017 (CNDDDB Occurrence No. 2023) (Figure 4), and was presumed to be overwintering as it was detected in the same culvert two times during the 2017 winter season. There are several other winter records for the Burrowing Owl in Santa Rosa, specifically around the Charles M. Schultz airport and at the west Santa Rosa airport (former military airport) in several different years (eBird records). There are no Burrowing Owl nesting records on the Santa Rosa Plain and that is likely because this owl typically nests in California ground squirrel (*Otospermophilus beechyi*) burrows. There are no California ground squirrels on the Santa Rosa Plain likely due to the fact that there is a high water table in much of the Plain. There are also very few California ground squirrels in the hills around Santa Rosa. Since there are no California ground squirrels on the project site and no burrows or burrow donors, there is no suitable habitat for the Burrowing Owl to nest onsite. Thus, while there is a very slight possibility that this owl could be observed stopping over on the project site during the winter months, nesting onsite is unlikely.

Given the low number of known occurrences of Western Burrowing Owl throughout Sonoma County, as well as the region’s lack of suitable nesting habitat, it is extremely unlikely that Western Burrowing Owls would nest on the project site. While a transient owl may stop by the project site in the winter months on its way elsewhere, it would not be expected to spend any length of time onsite due to an absence of protective cover (burrows) or other suitable habitat. Accordingly, impacts to Western Burrowing Owl from project implementation are less than significant pursuant to CEQA and mitigation is not warranted.

Remaining species

The remaining species, foothill yellow-legged frog (*Rana boylii*), red-bellied newt (*Taricha rivularis*), western pond turtle (*Emys marmorata*), and Coho salmon (*Oncorhynchus kisutch*) are not expected on the project site due to an absence of suitable habitat.

Nesting Birds

Common songbirds (passerine birds) and common waterfowl such as Mallard (*Anas platyrhynchos*) duck could nest on the project site. While the project site does not have any trees of suitable size or height to support most nesting raptor species known from the area (such as red-tailed hawks), during trees surveys for passerine birds and ground nesting surveys for

common waterfowl species, the trees will be scanned for nesting raptors. All of these birds and their eggs and young are protected under California Fish and Game Code Sections 3503, 3503.5 and the federal Migratory Bird Treaty Act. Any project-related impacts to these species would be considered a significant impact. Potential impacts to these species from the proposed project include disturbance to nesting birds and possibly abandonment of the nest which would result in death of the eggs and/or young. The potential impacts can be mitigated to a less than significant level with Mitigation Measure BIO-4.

To ensure the project does not result in impacts to any protected aquatic and/or terrestrial animal species, measures for avoidance and minimization of impacts to endangered/threatened animals have been incorporated into the project under Mitigation Measure BIO-3.

Significance Level:

Less than Significant with Mitigation Incorporated.

Mitigation Measure BIO-1 Special Status Plant Species Avoidance, Minimization, and Mitigation:

If federally and/or state-listed or CRPR 1B or 2 species are found during special status plant surveys (pursuant to Mitigation Measure BIO-2), and would be directly impacted, or there would be a population-level impact to non-listed sensitive species, then the project shall be re-designed to avoid impacting those plant species. Rare and listed plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm.

For projects on Rezoning Sites in BSAs located within the Santa Rosa Plain Area, protocol rare plant surveys shall be conducted, and impacts to suitable rare plant habitat mitigated, in accordance with the 2007 USFWS Santa Rosa Plain Programmatic Biological Opinion, as amended in 2020.

Mitigation Monitoring BIO-1:

Prior to building permit issuance Permit Sonoma shall verify that the project is designed to avoid impacting special status plant surveys, that protective fencing is in place to protect rare and listed plants located within 50 feet of disturbance limits, and that projects in the BSAs located within the Santa Rosa Plain Area have protocol rare plant surveys conducted on site.

Mitigation Measure BIO-2 Restoration and Monitoring, and Habitat Compensation:

Development and/or restoration activities shall be conducted in accordance with a site-specific Habitat Restoration Plan. If federally or state-listed plants or non-listed special status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 and to be determined by the County (in coordination with CDFW and USFWS as applicable) for each species as a component of habitat restoration, unless otherwise approved in writing by CDFW. For impacts to state-listed plants, habitat compensation at a minimum 1:1 mitigation to impact ratio shall be provided, which may include either the purchase of credits at a CDFW-approved mitigation or conservation bank or purchasing appropriate habitat and conserving it in perpetuity through a conservation easement and management plan, which shall be prepared, funded, and implemented by the Project in perpetuity, unless otherwise approved in writing by CDFW. A qualified biologist shall prepare and submit a restoration plan to the County and CDFW for review and approval. (Note: if a federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization will be obtained from these agencies.) The restoration plan shall include, at a minimum, the following components:

1. Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type)

2. Goal(s) of the compensatory mitigation project (type[s] and area[s]) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type[s] to be established, restored, enhanced, and/or preserved)
3. Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions, and values)
4. Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan)
5. Maintenance activities during the monitoring period, including weed removal as appropriate (activities, responsible parties, schedule)
6. Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports)
7. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants and 30 percent relative cover by vegetation type or other industry standards as determined by a qualified restoration specialist
8. An adaptive management program and remedial measures to address any shortcomings in meeting success criteria
9. Notification of completion of compensatory mitigation and agency confirmation
10. Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism)

Mitigation Monitoring BIO-2:

Prior to building permit issuance Permit Sonoma shall review and approve a restoration plan prepared by a qualified biologist if federally or state-listed plants or non-listed special status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development. The County shall verify that all impacts are mitigated by the applicant at a ratio not lower than 1:1.

Mitigation Measure BIO-3 Endangered/Threatened Animal Species Avoidance and Minimization:

The following measures shall be applied to aquatic and/or terrestrial animal species as determined by the project specific Biological Resources Screening and Assessment required under mitigation measure BIO-1.

1. Ground disturbance shall be limited to the minimum necessary to complete the project. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said areas and the limits of disturbance.
2. All projects occurring within/adjacent to sensitive habitats that may support federally and/or state listed endangered/threatened species shall have a CDFW and/or USFWS approved biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed said biologist shall conduct daily pre activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW, NMFS, and/or USFWS said biologists may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are fully implemented.
3. No endangered/threatened species shall be captured or and relocated without express permission from the CDFW NMFS and/or USFWS.
4. If at any time during project construction and endangered/threatened species enters the construction site or otherwise may be impacted by the project all project activities shall cease. A CDFW / USFWS approved biologist shall document the occurrence and consult with the CDFW and USFWS as appropriate to determine whether it was safe for project activities to resume.

5. For all projects occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade as shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete.
6. At the end of each work day, excavation shall be secured with cover or a ramp provided to prevent wildlife and treatment.
7. All trenches pipes culverts or similar structures shall be inspected for animals prior to burying capping moving or filling.

Mitigation Monitoring BIO-3:

Prior to building permit issuance Permit Sonoma shall verify that avoidance and minimization measures are applied to sites that are determined to have aquatic and/or terrestrial animal species by the Biological Resources Screening and Assessment required under mitigation measure BIO-1.

Mitigation Measure BIO-4 Pre-Construction Surveys for Nesting Birds:

NOTE ON MAP: "If initial ground disturbance or vegetation removal occurs during the breeding season for nesting birds (February 1 through September 15), a qualified biologist shall conduct a breeding bird survey no more than 14 days prior to project activities to determine if any birds are nesting in underground burrows or dens, or in trees on or adjacent to the project sites and shall conduct additional surveys if there is a lapse of 14 days or more in construction activities. The surveys shall include the entire disturbance area plus at least a 500-foot buffer around the project site. 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. If initial ground disturbance is delayed or there is a break in project activities of more than 14 days within the bird-nesting season, then a follow-up nesting bird survey shall be performed to ensure no nests have been established in the interim. If a burrowing owl or occupied burrow is found, CDFW will be contacted to determine the appropriate mitigation measure to avoid impacts on the species, which may include relocating the owl or burrow to a safe location."

Mitigation Monitoring BIO-4:

Prior to approval of the map for recordation, Permit Sonoma staff shall ensure the note is shown correctly on the map. Prior to issuance of grading or building permits, Permit Sonoma staff shall ensure that minimization measures are listed on all site alteration, grading, building or improvement plans. Prior to construction and through completion of initial site disturbance, Permit Sonoma staff shall verify that all surveys have been conducted according to applicable protocols and shall review the results of all pre-construction surveys and any measures recommended by the biologist to avoid sensitive habitat or species and ensure compliance.

- 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:

Since the project site has been greatly disturbed from years of past use and development, there are no native or natural habitats onsite that will result in the substantial adverse effect on sensitive natural communities such as oak woodlands. Additionally, the project site does not contain any riparian habitat as no creeks run through the project site thus resulting in no impact to riparian function onsite.

A referral to the California Department of Fish and Wildlife and the U.S. Fish and Wildlife service was sent to get comments on the proposed project, however none were received. The project with its proposed mitigations measures will ensure a Less than Significant Impact.

Significance Level:

Less than Significant Impact with Mitigation Incorporated.

Mitigation Measure:

See BIO-5 through BIO-7, see below.

- 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:

M&A Project Biologist, Ms. Monica Matthews, along with Ms. Lynch, conducted a wetland delineation on September 29, 2022 to assess the presence of wetlands and other water features located on the project site. According to the Corps confirmed Preliminary Jurisdictional Determination (PJD), there are 1.04-acres of waters of the United States on the project site. Of this .104-acre, 0.086-acres are “seasonal wetlands,” and 0.018-acres are “other waters” of the United States/State. The proposed project will result in impacts to areas that are within the Corps’ and RWQCB’s jurisdiction pursuant to Sections 404 and 401 of the Clean Water Act, respectively.

The project proposes to fill all seasonal wetlands onsite (See Figure 9 below) as well a portion of a linear other waters feature (OW1) and all of the road frontage ditch (OW2) which run along the northwestern and northeastern borders of the project site, respectively.

The proposed project’s total impacts to waters of the United States is less than 0.5-acres and should therefore qualify the project for a Nationwide Permit pursuant to Section 404 of the CWA. In accordance with any Nationwide Permit issued by the Corps for the proposed project, the applicant will be required to mitigate for the impacts to waters of the US (see mitigation measures below).

The two ditches (OW1 & OW2) are both features with a bed, bank and channel, and as such would likely fall under the CDFW’s jurisdiction pursuant to Section 1602 of the California Fish and Game Code. Construction activities will result in the filling of a portion of the ditch on the western portion of the project site (OW1) and all of the eastern ditch (OW2). These activities will impact the ditches below the top of banks. These impacts as illustrated by Munselle Civil Engineering in the Site Plan for 175 Airport Boulevard dated 2023, will be subject to CDFW regulation.

Figure 9. Wetlands Map

Impacts to seasonal wetlands and drainage ditches can be mitigated to a level considered less than significant by incorporating Mitigation Measures BIO-5, BIO-6, and BIO-7 below.

Significance Level:

Less than Significant with Mitigation Incorporated.

Mitigation Measure BIO-5

The project applicant will apply for a Nationwide Permit Program (NWP) from the Corps and a Section 401 Certification of water quality from the RWQCB. Proof of a Section 404 permit from the Corps and a Section 401 water quality certification (permit) from the RWQCB shall be provided to the County prior to filling any wetlands or other waters on the project site. Any conditions or stipulations in the Section 404 and 401 permits issued for this project will become conditions of project approval.

Mitigation Monitoring BIO-5

Permit Sonoma shall not allow the tentative map to record prior to the NWP and Section 401 Certifications being submitted and accepted by Permit Sonoma.

Mitigation Measure BIO-6

Any impacts to the waters of U.S./State shall be mitigated for at a minimum 1:1 mitigation ratio or at a ratio stipulated in the agency permits. To mitigate impacts to waters of the U.S./State, wetland credits



will be purchased from an agency-approved mitigation bank in accordance with all permits acquired that authorize impacts to jurisdictional waters (which includes wetlands). Proof of credit purchase must be submitted to the Corps and RWQCB prior to filling the waters/wetlands onsite.

Mitigation Monitoring BIO-6

Permit Sonoma shall not allow the tentative map to record prior until proof of purchase of wetland mitigation credits are provided to Permit Sonoma.

Mitigation Measure BIO-7

The applicant shall secure a Stream Bed Alteration Agreement (SBAA) from the CDFW if required for alterations to OW1 and OW2 and implement all measures identified in the SBAA including but not limited to the following:

- a. To avoid fuels, lubricants, soils and other pollutants from entering any portion of the onsite ditches to remain or any offsite water feature, wildlife friendly hay wattles (that is, no mono-filament netting) and silt fencing shall be installed at the top of bank of the feature or in a strategic position to protect offsite water ways. The use of mulch, loose straw, or any other substitute that may enter into any waters shall be prohibited.
- b. Staging, operation and maintenance of heavy duty construction equipment shall be located open waterways at all times unless the equipment is needed to specifically work on the ditch for the project.
- c. To mitigate for any impacts to the ditch, the CDFW may allow the purchase of mitigation credits similar to the RWQCB or the CDFW may allow riparian enhancement/planting of offsite areas to be preserved in perpetuity.

Any further requirements set forth in the Streambed Alteration Agreement (SBAA) issued for the project from the CDFW, such as specific erosion control measures, shall also be implemented.

Mitigation Monitoring BIO-7

Permit Sonoma shall not allow the tentative map to record prior until proof of the SBAA has been accepted by Permit Sonoma.

- 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:

Wildlife corridors are linear and/or regional habitats that provide connectivity to other natural vegetation communities within a landscape fractured by urbanization and other development. Wildlife corridors have several functions: 1) they provide avenues along which wide-ranging animals can travel, migrate, and breed, allowing genetic interchange to occur; 2) populations can move in response to environmental changes and natural disasters; and 3) individuals can recolonize habitats from which populations have been locally extirpated (Beier and Loe 1992). All three of these functions can be met if both regional and local wildlife corridors are accessible to wildlife. Regional wildlife corridors provide foraging, breeding, and retreat areas for migrating, dispersing, immigrating, and emigrating wildlife populations. Local wildlife corridors also provide access routes to food, cover, and water resources within restricted habitats. The project site currently does not serve as a wildlife corridor as it is surrounded by a mixture of commercial and residential development; this is an infill development. Given the project site's location, the project will not result in any long-term or temporary impacts to wildlife movement through the work area during or after construction, and thus the project will not adversely impact wildlife movement corridors once the project is constructed. The project site does not have any trees of suitable size or height to support most nesting raptor species, and potential impacts to these species will be addressed through Mitigation Measure BIO-1 above.

Significance Level:

Less than Significant with Mitigation Incorporated.

Mitigation:

See Mitigation Measure BIO-4 above.

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

Comment:

John C. Meserve ISA Certified Arborist prepared a tree inventory report for the project, dated August May 29, 2023. The report indicates that there are 25 trees on the site or immediately adjacent to the property, of which 14 trees are protected trees consisting of; Monterey Pine, Coast Live Oak, Glossy Privet, Coast Redwood, Valley Oak, and Flowering Pear, under the County's Tree Protection ordinance. The project proposes to retain all 13 oaks onsite and incorporates these trees into the landscaping plan for the project. Consistent with the County's tree protection ordinance, protected trees proposed for removal will be mitigated through replanting at the ratio required by the County ordinance. See Mitigation Measure BIO-8 below for tree removal. Additionally, with the incorporation of Mitigation Measure BIO-9, all personnel associated with project construction shall attend a worker environmental awareness training, conducted by a qualified biologist, to be trained on protecting biological resources onsite.

Significance Level:

Less than Significant with Mitigation Incorporated.

Mitigation Measure BIO-8 Tree Removal:

The project shall comply with the County's Tree Protection Ordinance by mitigating the removal of protected trees through replanting. Documentation of tree removal mitigation shall be provided on the final landscape plans.

Mitigation Monitoring BIO-8: Prior to building permit issuance, the Design Review Committee and/or Permit Sonoma staff will ensure that the plans include adequate tree planting, consistent with the County Tree Protection Ordinance. Prior to building permit final, the planner will verify that tree plantings have been installed.

Mitigation Measure BIO-9 Worker Environmental Awareness Program:

If potential impacts to special status species are identified in the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall attend Worker Environmental Awareness Program training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the BSAs for the project. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of projects. All employees shall sign a form documenting provided by the trainer indicating they have attended the Worker Environmental Awareness Program and understand the information presented to them. The form shall be submitted to the County to document compliance.

Mitigation Monitoring BIO-9:

Prior to building permit issuance Permit Sonoma shall receive and review a form signed by all personnel associated with project construction to verify that they have attended the Worker Environmental Awareness Program and understand the information presented to them.

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

Comment:

There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state Habitat Conservation Plans within the project area. Federally designated Critical Habitat and the project's consistency with the Santa Rosa Plain Conservation Strategy is discussed in 4(a) above. Because the project site is located within the Santa Rosa Plain Conservation Strategy, Best Management Practices for invasive weed prevention and management have been incorporated into the project under Mitigation Measure BIO-10 below.

Significance Level:

Less than Significant Impact.

Mitigation Measure BIO-10 Invasive Weed Prevention and Management Program:

Prior to start of construction a qualified biologist shall develop an Invasive Weed Prevention and Management Plan to prevent invasion of native habitat by non-native plant species. A list of target species shall be included, along with measures for early detection and eradication. All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six weeks since ground disturbing activities ceased. If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan. Landscape species shall not include noxious, invasive, and/or non-native plant species that are recognized on the federal Noxious Weed List, California Noxious Weeds List, and/or California Invasive Plant Council Moderate and High-Risk Lists.

Mitigation Monitoring BIO-10:

Prior to building permit issuance Permit Sonoma shall verify that a qualified biologist has developed an Invasive Weed Prevention and Management Plan for projects which include activity that would occur within or adjacent to sensitive habitats, as determined by the project-specific Biological Resources Assessment.

5. CULTURAL RESOURCES:

Would the project:

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

Comment:

Taylor Alshuth, BA and Eileen Barrow, MA/RPA of Tom Origer & Associates ²conducted a cultural resources evaluation of the project site in April of 2023 which concluded that except for the former power pole and asphalt, no evidence of buildings previously within the study area were identified and these features would not meet criteria for inclusion on the California Register.

Significance Level:

No Impact.

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

Comment:

On July 31, 2023, Permit Sonoma staff referred the project application to Native American Tribes

² CONFIDENTIAL Taylor Alshuth, BA and Eileen Barrow, MA/RPA, "Cultural Resources Study of the Property at 175 Airport Boulevard Santa Rosa, Sonoma County, California", April 7, 2023

within Sonoma County to request consultation under AB-52 (the request for consultation period ended August 31, 2023). No requests for consultation were received.

As mentioned in the discussion of section 5(a), Tom Origer & Associates conducted a cultural resources evaluation of the project site, and no cultural or historic resources were found on the site. The project site presents a moderate probability of there being buried resources within the study area and could uncover such materials during construction. Consistent with the CEQA guidelines, Mitigation Measures TCR-1 and TCR-2 have been incorporated into the project to ensure accidental discoveries are mitigated to a less than significant impact.

Significance Level:

Less than Significant with Mitigation Incorporated.

Mitigation Measure:

See Mitigation Measure TCR-1 and TCR-2

Mitigation Monitoring:

See Mitigation Monitoring TCR-1 and TCR-2

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

Comment:

According to the project cultural resource study, prepared by Tom Origer & Associates in 2023, the field survey found no archaeological sites within the study area but the application of the buried sites model indicates a high potential for buried resources. However, no archaeological site indicators were observed within the soil excavated by the auger borings which reduces the buried site potential to a 2-3% probability of their being buried resources within the study area, and the project site has already been disturbed by past construction. Mitigation Measure TCR-1 will reduce potential impacts to less than significant.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation Measure:

See Mitigation Measure and Monitoring TCR-1 and TCR-2

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:

During construction, the proposed project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment. No natural gas would be utilized as part of construction. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site preparation, grading, paving, and building construction. The types of equipment could include gasoline- and diesel powered construction and transportation equipment, including trucks, bulldozers, frontend loaders, forklifts, and cranes. Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools.

Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations Title 13, Sections 2449(d)(3) and 2485 limit idling from both on-road and off-road diesel-powered equipment and are enforced by

the Air Resources Board (ARB). In addition, given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. Construction shall be limited between the hours of 7:00 a.m. and 5:00 p.m. on weekdays, and between 9:00 a.m. and 5:00 p.m. on weekends. As on-site construction activities would be restricted to these hours, it is anticipated that the use of construction lighting would also be similarly limited. Because of the temporary nature of construction and the financial incentives for developers and contractors to implement efficient energy use, the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. Therefore, the construction-related impact related to fuel and electricity consumption would be less than significant.

The proposed project would be designed and constructed in accordance with CALGreen standards. CALGreen Requirements include building, electricity, and water conservation energy saving measures that are required to be completed as part of the building permitting process. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building.

Compliance with Title 24 standards would ensure that operational energy consumption would not result in the use of energy in a wasteful or inefficient manner. Therefore, the operational impact related to building electricity and natural gas consumption would be less than significant.

Significance Level:

Less than Significant Impact.

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

Comment:

The County of Sonoma has not adopted a local renewable energy plan; however, the General Plan includes a variety of policies intended to encourage development of renewable energy systems, while protecting sensitive resources and ensuring neighborhood compatibility. Although renewable energy is encouraged, there is no requirement to develop renewable energy sources for single family residential development projects, outside of meeting Title 24 requirements discussed above. Title 24 Building Energy Efficiency Standards are intended to increase the energy efficiency of new development projects in the state and move the State closer to its zero-net energy goals. The project would be automatically enrolled as a member of the SCP, which serves as the Community Choice Aggregate (CCA) for the County. SCP works in partnership with PG&E to deliver GHG-efficient electricity to customers within its member jurisdictions.

Additionally, the project is not located in an identified area designated for renewable energy productions nor would the project interfere with the installation of any renewable energy systems. Therefore, the project would not conflict with or obstruct with applicable State and local plans for promoting use of renewable energy and energy efficiency.

Significance Level:

Less than Significant 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.**

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

Comment:

The applicant provided a 2003 Geotechnical Investigation report prepared by PJC & Associates, Inc. for the original residential housing project previously approved for the vacant site (see attachment 7). On June 1, 2023, PJC & Associates updated their 2003 Geotechnical Investigation report and concluded the project is feasible from a geotechnical engineering standpoint, provided the recommendations in their report are incorporated into project design and construction of the project, .

The project site is not within a fault hazard zone as delineated by the Alquist-Priolo fault maps³ or on a known fault based on the Safety Maps in the Sonoma County General Plan. The Uniform Building Code has been developed to address seismic events in California and development which complies with the Code will result in buildings which should withstand the most severe reasonably anticipated seismic event.

Significance Level:

Less than Significant Impact.

- ii. **Strong seismic ground shaking?**

Comment:

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

Significance Level:

Less than Significant with Mitigation Incorporated.

Mitigation GEO-1:

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

³ California Department of Conservation, "EQ Zapp: California Earthquake Hazards Zone Application", Accessed January 12, 2023, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

Mitigation Monitoring GEO-1:

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

Mitigation GEO-2:

The design of all earthwork, cuts and fills, drainage, pavements, utilities, foundations and structural components shall conform with the specifications and criteria contained in the project geotechnical report PJC & Associates, Inc. dated December 23, 2003 and updated on June 1, 2023. The geotechnical engineer shall submit an approval letter for the engineered grading plans prior to issuance of the grading permit. Prior to final of the grading permit the geotechnical engineer shall also inspect the construction work and shall certify to Permit Sonoma, prior to the acceptance of the improvements or issuance of a certificate of occupancy that the improvements have been constructed in accordance with the geotechnical specifications.

Mitigation Monitoring GEO-2:

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

iii. Seismic-related ground failure, including liquefaction?

Comment:

Strong ground shaking can result in liquefaction, the sudden loss of shear strength in saturated sandy material, resulting ground failure. Areas of Sonoma County most at risk of liquefaction are along San Pablo Bay and in alluvial valleys. The project includes new residential structures within a designated medium liquefaction area. Therefore, the property has the potential to experience liquefaction and settlement during a seismic event. All structures will be required to meet building permit requirements, including seismic safety standards and soil test/compaction requirements. Implementation of Mitigation Measures GEO-1, above would reduce any impacts to less than significant.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation Measure:

See Mitigation Measure and Monitoring GEO-1.

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. According to the Sonoma County Hazard Mitigation Plan (Figure 8.11), the project site is located in an area with very low susceptibility to landslides⁴. All structures are required to meet building permit requirements, including seismic safety standards and soil test/compaction requirements. The design and construction of new structures are subject to engineering standards of the California Building Code (CBC), which consider soil properties, seismic shaking and foundation type. Project conditions of approval require that building and grading permits be obtained for all construction and that the project meet all standard seismic and soil test/compaction requirements.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation Measure:

See Mitigation Measure and Monitoring GEO-2

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

Comment:

Future project related construction involves 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.

Issuance of a grading permit requires the applicant to prepare and conform to an erosion prevention/sediment control plan which clearly shows best management practices to be implemented, limits of disturbed areas, vegetated areas to be preserved, pertinent details, notes, and specifications to prevent damages and minimize adverse impacts to the environment. Tracking of soil or construction debris into the public right-of-way shall be prohibited. Runoff containing concrete waste or by-products shall not be allowed to drain to the storm drain system, waterway(s), or adjacent lands.

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 with Mitigation Incorporated.

Mitigation Measure GEO-3:

The project site will be inspected following the first heavy rain, during the middle of the rainy season and at the end of the rainy season following construction. During each visit, areas of significant erosion or erosion control device failure shall be noted and appropriate remedial actions taken.

Mitigation Monitoring GEO-3:

The project site shall be inspected by County staff after storm events that produce 1 inch of rain or greater within 24 hour period in the Santa Rosa area. During every inspection, areas of significant erosion or erosion control device failure shall be noted and appropriate remedial actions will be taken as soon as practical. If erosion control measures appear to be effective for three consecutive site inspections following 1-inch storm events, then site inspections will only be required following storm events that result in 2 inches of rain, or greater, within a 24-hour period in the Santa Rosa area.

At the end of the rainy season, County staff shall re-inspect the site and evaluate the effectiveness of the erosion control measures that were used. If there were problem areas at the site, recommendations will be made to improve methods used in subsequent projects.

Mitigation Measure GEO-4:

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

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

Mitigation Monitoring GEO-4:

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

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

Comment:

The project site is subject to seismic shaking and other geologic hazards as described in item 6.a.ii, iii, and iv, above. However, site specific geologic investigation will be conducted through the site development permitting process, which require construction techniques that account for site specific conditions. Refer to Mitigation Measures GEO-1 and GEO-2 above.

Significance Level:

Less than Significant with Mitigation Incorporated.

Mitigation Measure:

See Mitigation Measures GEO-1 and GEO-2.

- 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. Soils on site have been tested Design Level Geotechnical Investigation, PJC & Associates, Inc., 2003, the surface and near surface soils are judged to have high expansion potential. It will be necessary to support foundations and concrete slabs on-grade on a blanket of non-expansive, compacted engineered fill or compacted lime treated soils. 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 provided the project incorporates recommendations provided in the geotechnical study.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation Measure:

See Mitigation Measures GEO-1 and GEO-2.

- 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 will be served by public sewer for disposal of wastewater.

Significance Level:

No Impact.

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

Comment:

The cultural resources evaluation conducted by professional archaeologists in 2023 did not discover any unique paleontological or geological feature on the property, although paleontological features may be uncovered during project-related construction. Mitigation Measure GEO-5 will reduce potential impacts to less than significant.

Significance Level:

Less than Significant with Mitigation Incorporated.

Mitigation Measure GEO-5:

For projects with proposed ground-disturbing activity, the project applicant shall retain a Qualified Professional Paleontologist to review proposed ground disturbance associated with development to:

1. Assess if the project will require paleontological monitoring;
2. If monitoring is required, to develop a project-specific Paleontological Resource Mitigation and Monitoring Program (PRMMP) as outlined in Mitigation Measure GEO-2 from the Final EIR of the Housing Element Update (State Clearinghouse #2022060323);

3. Draft the Paleontological Worker Environmental Awareness Program as outlined in Mitigation Measure GEO-3 from the Final EIR of the Housing Element Update (State Clearinghouse #2022060323); and
4. Define within a project specific PRMMP under what specific ground disturbing activity paleontological monitoring will be required and the procedures for collection and curation of recovered fossils, as described in Mitigation Measures GEO-4, GEO-5, and GEO-6 from the Final EIR of the Housing Element Update (State Clearinghouse #2022060323).

The Qualified Paleontologist shall base the assessment of monitoring requirements on the location and depth of ground disturbing activity in the context of the paleontological potential and potential impacts outlined in this section. A qualified professional paleontologist is defined by the SVP standards as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years (SVP 2010). The County shall review and approve the assessment before grading permits are issued.

Mitigation Monitoring GEO-5:

Prior to issuance or grading permits Permit Sonoma shall review and approve an assessment of monitoring requirements prepared by a Qualified Professional Paleontologist

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:

Section 15064.4 of the State CEQA Guidelines assists lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 gives lead agencies the discretion to assess emissions quantitatively or qualitatively. The CEQA Guidelines do not establish a threshold of significance. Lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or other experts, so long as any threshold chosen is supported by substantial evidence.

The Bay Area Air Quality Management District's (BAAQMD) 2022 Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects acknowledges that evaluating climate impacts under CEQA can be challenging because global climate change is inherently a cumulative problem, rather than the result of a single source of greenhouse gas (GHG) emissions. With that in mind, the BAAQMD has recommended thresholds of significance as to whether a proposed project would have a "cumulatively considerable" contribution to the significant cumulative impact on climate change.

For land use development projects, the BAAQMD recommends using an approach which evaluates a project based on its effect on California's efforts to meet the State's long-term climate goals. Using this approach, a project that is consistent with and would contribute its "fair share" towards achieving those long-term climate goals can be found to have a less-than-significant impact on climate change under CEQA because the project would, in effect, help to solve the problem of global climate change. Applying this approach, the Air District has analyzed what will be required of new land use development projects to achieve California's long-term climate goal of carbon neutrality by 2045.

Because GHG emissions from the land use sector come primarily from building energy use and from transportation, these are the areas that the BAAQMD evaluated to ensure that a project can and will

do its fair share to achieve carbon neutrality. With respect to building energy use, the BAAQMD recommends replacing natural gas with electric power and eliminating inefficient or wasteful energy usage. This will support California's transition away from fossil fuel-based energy sources and will bring a project's GHG emissions associated with building energy use down to zero as the state's electric supply becomes 100 percent carbon free. With respect to transportation, the BAAQMD recommends that projects be designed to reduce project-generated Vehicle Miles Travelled (VMT) and to provide sufficient electric vehicle (EV) charging infrastructure to support a shift to EVs over time.

The BAAQMB has found, based on this analysis, that a new land use development project being built today either must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b), or must incorporate the following design elements to achieve its "fair share" of implementing the goal of carbon neutrality by 2045:

A. Projects must include, at a minimum, the following project design elements:

1. Buildings

a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).

b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

2. Transportation

a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's (OPR) 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA:

- i. Residential projects: 15 percent below the existing VMT per capita
- ii. Office projects: 15 percent below the existing VMT per employee
- iii. Retail projects: no net increase in existing VMT

b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

New land use projects are required to meet either section A or B from the above list, not both, to be considered less than significant. There is currently no applicable local GHG reduction strategy, such as an adopted Climate Action Plan, for Sonoma County. Therefore, the applicants provided a GHG Assessment prepared by Illingworth & Rodkin, Inc., dated June 14, 2023 (see attachment 9). The GHG Assessment's findings are discussed below.

Buildings: As discussed in the Energy Section 6a, the project does include new construction and the new construction has the potential to result in wasteful, inefficient or unnecessary energy usage. Plans for the housing development include electric heat pumps and do not propose natural gas connections. The 57 new residential dwelling units are small energy efficient living units that range approximately 1,230 to 2,058 square feet in size and will comply with the latest Title 24 Building Energy Efficiency Standards. The project also proposes solar arrays and the use of Sonoma Clean Power as their utility provider. Therefore, impacts due to energy consumption would be less than significant.

Transportation: The project proposes 57 new single family dwelling units and is estimated to generate an average of 502 daily trips based on the project Traffic Study prepared by W-Trans, dated December 1, 2023..

As discussed in the Transportation Section 17b, VMT refers to the amount and distance of automobile travel attributable to a project. The County of Sonoma has not yet adopted specific VMT policies or thresholds of significance. However, the OPR Technical Advisory, 2018, indicates that a residential project generating vehicle travel that is 15 or more percent below the existing citywide residential VMT per capita may indicate a less-than-significant transportation impact. Based on data from the recently updated SCTA travel demand model, the County of Sonoma has a baseline average residential VMT of 16.60 miles per capita. Applying OPR's guidance, a residential project generating a VMT that is 15 percent or more below this value, or 14.11 miles per capita, would have a less-than-significant VMT impact. The SCTA model includes traffic analysis zones (TAZ) covering geographic areas throughout Sonoma County. The proposed housing development project site is located within TAZ 112, which has a baseline VMT per capita of 9.94 miles. Thus, the project would have a less-than-significant impact on VMT.

The latest California Green Building Standards Code (CALGreen) was published in 2022 and went into effect on January 1, 2023. The 2022 CALGreen Tier 1 and 2 requirements for EV charging stations apply to new residential dwelling units and require that a complete EV charging circuit and receptacle is provided for each new dwelling unit. Per the project GHG Assessment, the project includes hook-up ready EV charging outlets in each garage.

The BAAQMD 2022 guidance does not propose construction-related climate impact thresholds, stating that GHG emissions from construction represent a very small portion of a project's lifetime GHG emissions, and that land use project thresholds are better focused on addressing operational GHG emissions, which represent the vast majority of project GHG emissions. Therefore, construction related GHG would not exceed established thresholds.

Because the proposed in-fill housing development project does not propose the use of natural gas, will comply with Title 24 Building Energy Efficiency Standards, generate a less than significant impact on VMT, and meet 2022 CALGreen requirements for EV charging stations, the project would contribute its "fair share" towards achieving the State's long-term climate goals, and therefore, would have a less-than-significant impact on climate change.

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:

A Climate Action 2020 Plan was developed by the Sonoma County Regional Climate Plan Authority (RCPA) in 2016 but was unable to be formally adopted due to litigation. 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 reduce greenhouse gas emissions by 40 percent below 1990 levels by 2030 and by 80 percent below 1990 levels by 2050. The Resolution of Intent included specific goals that can further reduce greenhouse gas emissions. All new development is required to evaluate all reasonably feasible measures to reduce greenhouse gas emissions and enhance carbon sequestration. The project will not conflict with applicable goals, objectives, plans, policies, or regulations because the project by design has measures included in design to meet the County Goals of GHG reduction.

The project is consistent with the Board's 2018 Climate Change Action Resolution as it is expected to have less-than-significant vehicle miles travelled (VMT) impacts and proposes the following project design elements:

- Small energy efficient living units that would meet State and local building code requirements for energy efficiency
- Solar power generating systems
- No use of natural gas.

- Electric heat pumps
- Hook-up ready EV charging outlets in each garage
- Low-flow water fixtures
- Small landscaped areas
- Water-efficient irrigation systems

By incorporating these GHG reduction strategies, the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Significance Level:

Less than Significant Impact.

9. HAZARDS AND HAZARDOUS MATERIALS:

Would the project:

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

Comment:

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.

- 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 would not generate or produce substantial quantities of hazardous material or unsafe conditions. During construction activities there could be spills of hazardous materials. To address this possibility, the project is required to comply with all applicable hazardous materials handling and storage requirements and would use qualified contractors for construction. See Section 9.a, above.

Significance Level:

Less than Significant.

- 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 is located approximately .25 miles from the San Miguel Elementary School; however, the project does not involve hazardous emissions or handle hazardous materials.

Significance Level:

Less than Significant 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 subject property, based on a review of the following databases on January 10, 2024:

1. The State Water Resources Control Board Geotracker database⁵,
2. The Department of Toxic Substances Control EnviroStor database⁶ (formerly known as Calsites), and
3. The Calrecycle Solid Waste Information System (SWIS)⁷.

The closest hazardous materials sites on record are LUST (Leaking Underground Storage Tank) cleanup sites. One LUST Cleanup site is located on the adjacent Gas Station Property to the North of the project site, the site is under a "Verification Monitoring" status according to the State Water Resources Control Board Geotracker database. The State Water Resources Control Board Geotracker defines the "Verification Monitoring" status as "*Remediation phases are essentially complete and a monitoring/sampling program is occurring to confirm successful completion of cleanup at the Site. (e.g. No "active" remediation is considered necessary or no additional "active" remediation is anticipated as needed. Active remediation system(s) has/have been shut-off and the potential for a rebound in contaminant concentrations is under evaluation).*" No new ground disturbing activities are proposed on the adjacent neighboring property therefore no impacts are expected.

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 site is not within the Airport Referral Area as designated by the Sonoma County Comprehensive Airport Land Use Plan. With the project site being just over 2 miles from the Sonoma County Airport.

Significance Level:

No Impact.

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

⁵ State Water Resources Control Board Geotracker, "Geotracker", State of California, Accessed July 15, 2021, <https://geotracker.waterboards.ca.gov/>

⁶ Department of Toxic Substances Control Envirostor, "Envirostor", State of California, Accessed July 15, 2021, <https://www.envirostor.dtsc.ca.gov/public/>

⁷ CalRecycle, "SWIS Facility/Site Search", Accessed July 15, 2021, <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>

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. Subsequent residential development of the proposed parcels would not change existing circulation patterns significantly, would not generate substantial new traffic, and therefore 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:

According to the Wildland Fire Hazard Area map (Figure PS-1g) in the Sonoma County General Plan, the project site is located in a Local Responsibility Area (LRA) served by the Sonoma County Fire District. It is not within a Fire Hazard Severity Zone.

Strong north-east "Santa Ana" winds, typical in Sonoma County, can increase the severity of wildland fire in the fall months. During fire season, gradient winds are generally out of the south/southwest at 5-10 mph, strengthening to 10-15 mph in the late afternoon. These prevailing wind conditions are not unique to the project site.

All construction projects must comply with County Fire Safe Standards (Sonoma County Municipal Code Chapter 13), including but not limited to, installing fire sprinklers in buildings, providing emergency vehicle access, and maintaining a dedicated fire-fighting water supply on-site. Other code-required fire safe standards relate to fuel modification, defensible space, road naming, and addressing through the projects proposed Fire and Survey conditions of approval.

Application of County and State fire safe standards reduces the project's potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires to a less than significant level.

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 Clean Water Act (CWA) governs and authorizes water quality control at the federal level. The CWA established the National Pollutant Discharge Elimination System (NPDES) permit program to regulate municipal and industrial discharge.

At the State level, the Porter-Cologne Water Quality Control of 1969 oversees California's water quality. Under the Porter-Cologne Act, the State must adopt water quality policies, plans, and objectives that protect the State's waters. Regional authority for the planning, permitting, and enforcement of the State's policies, plans and objectives is delegated to the Regional Water Quality

Control Boards. The project is located within the jurisdiction of the North Coast Regional Water Quality Control Board (NCRWQCB).

The project is located within the Windsor Creek watershed boundaries and within the Santa Rosa Plain priority groundwater basin. The Windsor Creek watershed flows into the Russian River, which flows into the Pacific Ocean. The site is within the Larkfield Urban Service Area, and the applicant will be required to obtain a utility certificate to receive water service. Wastewater service will be provided by the Larkfield Wikiup Sanitation zone, which is treated by the Airport-Larkfield-Wikiup treatment facility. This facility has adequate capacity for the project and operates in compliance with Conditions of Waste Discharge issued by the North Coast Regional Water Quality Control Board. The project will discharge storm water into the City of Santa Rosa storm water drainage system, which discharges into the Russian River via Santa Rosa Creek.

Munselle Civil Engineering prepared a preliminary Initial Storm Water Low Impact Development report for the project, February 2, 2024 (see attachment 11). According to the report, the project site is within the permit boundary of the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4), which regulates discharges into the watershed with the intent to reduce storm water pollution and protect the water quality of our local creeks and waterways and continue to promote groundwater recharge.

Construction activities for the project will involve disturbing one or more acres of ground, so the project is subject to the requirements of the State Water Resources Control Board (SWRCB) NPDES General Permit for Discharges of Storm Water Runoff Associated with Construction Activity (General Construction Permit). Construction activities include clearing, grading, excavation, stockpiling, and reconstruction of existing facilities involving removal and replacement. Applicants of construction projects must file for coverage under the General Construction Permit by submitting a complete Notice of Intent (NOI) package to the SWRCB; and developing and implementing a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must contain a site map that shows the construction site perimeter; existing and proposed buildings, lots, roadways, and storm water collection and discharge points; general topography both before and after construction; and drainage patterns across the project site. The SWPPP must include the Best Management Practices (BMPs) that the applicant will use to protect the quality of storm water runoff and the placement of those BMPs.

Implementation of the BMPs identified in the SWPPP would assure that the proposed project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality at the time of construction.

The project involves placement of more than 10,000 square feet of impervious surface area therefore, it must both meet the requirements of the Sonoma County Storm Water Quality Ordinance and incorporate Low Impact Development (LID) Best Management Practices (BMPs) contained in the City of Santa Rosa and County of Sonoma Storm Water Low Impact Development Technical Design Manual.

LID is a site design strategy of BMPs that mimics the pre-development site hydrology. To this end, the project will collect overland flow and route it to a series of proposed stormwater treatment facilities before entering the underground drainage system. These features will be constructed over aggregate layers where stormwater will be retained. This pretreatment design feature will not only remove pollutants, but also will reduce the amount of runoff by capturing and infiltrating storm water onsite. The treatment facilities are proposed at various locations throughout the project site.

Standard project conditions of approval for implementation of permanent stormwater quality features as required to obtain grading and drainage permits, and implementation of post-construction BMPs as required under the NPDES permit have been incorporated into the project to ensure that no stormwater discharge requirements are violated. Therefore, the proposed project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface

or groundwater quality. The potential impacts would therefore be less than significant.

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 is located in a Class 1 Major Groundwater Basin and will receive municipal water from Cal American through the Utility Certificate process. Cal American is served by wells that pump water from the Glen Ellen formation. In addition, in 2022 California American Water purchased water from the Sonoma County Water Agency (SCWA). Water purchased from SCWA originates from Ranney Collectors and wells along the Russian River in the Santa Rosa Plain. On July 21, 2023, Permit Sonoma's staff geologist reviewed the project and determined no additional conditions of approval related to hydrology and water quality were necessary for the project.

Significance Level:

Less than Significant Impact.

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

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

Comment:

Construction of the proposed project involves minor cuts, fills, and other grading. Unregulated grading during construction has the potential to increase soil erosion from a site, which could cause downstream flooding and further erosion, which could adversely impact downstream water quality. Construction grading activities shall be in compliance with performance standards in the Sonoma County Grading and Drainage Ordinance. The ordinance and adopted construction site Best Management Practices (BMPs) require installation of adequate erosion prevention and sediment control management practices. These ordinance requirements and BMPs are specifically designed to maintain water quantity and ensure erosion and siltation impacts are less than significant level during and post construction. Therefore, construction activities associated with the proposed project will not alter the existing drainage pattern of the site or area in a way that would result in downstream erosion and/or sedimentation.

Significance Level:

Less than Significant Impact.

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

Comment:

The proposed project would increase the amount of surface runoff generated on the project site because of an increase in impervious surfaces compared to existing conditions. As outlined in the Initial Storm Water Low Impact Development report prepared for the project by Munselle Civil Engineering, the project includes a storm drainage system consisting of bio-retention beds. Bio-retention beds have been selected for this project because of their ability to remove pollutants through a variety of natural physical, biological and chemical treatment processes. These BMPs are considered a Low Impact Development (LID) device for treatment control. They have also been selected because they provide an opportunity for the runoff to settle any suspended solids and

remove hydrocarbons, both of which have been identified as pollutants that can degrade the downstream receiving waters of the project. Compared to pipe networks, bio-retention beds with gravel storage areas will reduce runoff from the site and provide ground water recharge. This provides the opportunity to reduce the peak flow in a basin. For this project, hydromodification requirements are required because the project creates more than 1 acre of impervious surface. The proposed project fulfills the Hydromodification requirement (100% volume capture of runoff from 1.0" of rain over a 24-hr period) by providing 100% of the required volume capture in proposed Priority 1 bioretention BMPs. BMP sizing calculations are attached to this report. Separate from SWLID requirements, this project is required to detain the net increase of the 10-year storm. However, the net increase of the 10 year storm is less than the amount of storage required to meet the Hydromodification requirement.

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:

See comments (a) and (c)(i) above.

Significance Level:

Less than Significant Impact.

iv. Impede or redirect flood flows?

Comment:

The parcel is not in the 100-year flood zone or Special Flood Hazard Area (SFHA) (i.e., the area that will be inundated by the flood event having a 1 percent chance of being equaled or exceeded in any given year). 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. As described in further detail under Impact 10(d), the project site is not susceptible to inundation from flood hazards, tsunamis, or seiches. As a result, the proposed project would not impede or redirect flood flow, and there would be no impact.

Significance Level:

No Impact.

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

Comment:

According to Figure PS-1e of the General Plan, the project site is outside of the 100-year Flood Hazard Area⁸. There are no blue line streams on the property. The project site is not located in an area subject to seiche or tsunami. Mudflow can be triggered by heavy rainfall, earthquakes, or volcanic eruption. Existing flood hazards that could affect new development are considered in this analysis. Impacts of the environment on the proposed project are analyzed as a matter of County policy, not because such analysis is required by CEQA.

Significance Level:

Less than Significant Impact

⁸ "Sonoma County General Plan 2020 (as amended)", County of Sonoma, September 23, 2008

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

Comment:

The project is subject to Chapter 11 (Construction Grading and Drainage Ordinance) and Chapter 11A (Storm Water Quality Ordinance) of the Sonoma County Code and the Sonoma County Storm Water Low Impact Development Guide, all of which include performance standards and Best Management Practices for pre-construction, construction, and post-construction to prevent and/or minimize the discharge of pollutants, including sediment, from the project site. The site is located within the Santa Rosa Plain Priority SGMA basin, however, the project relies on municipal water service provided by the City of Santa Rosa. The project will not impede or conflict with implementation of the Sonoma County Storm Water Low Impact Development Guidelines or the goals of the Sustainable Groundwater Management Act.

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 an environmental effect, including in the Sonoma County General Plan and zoning ordinance.

The General Plan Land Use Designation for the property is Urban Residential and allows for the development of single family housing subject to a Major Subdivision and Use Permit for a Planned Development. The base density of site allows for 42.93 units, rounded up to 43. The applicant requests a 32.6 percent density bonus under State law to achieve the 57-unit project by providing 13 percent of the base units (6 units) for low income households and 13 percent of the base units for moderate income households (6 units). Under Government Code 65915, the State density bonus law, the County finds this increased density consistent with the General Plan.

In accordance with State Density Bonus Law (Government Code Section 65915), the applicant may request the waiver or reduction of any development standard that would have the effect of physically precluding the construction of the project at the density permitted with the density bonus. The applicant has submitted a request for a reduction in the following development standards applicable in the R2 Medium Density and R3 High Density Residential Zoning Districts:

Zoning District Development Standards	R2 District Requirements	R3 District Requirements	Proposed Project
Minimum Lot Size	6000 square feet	6000 square feet	1,322 – 3,414 square feet
Minimum Lot Width	60 feet	80 feet	18.34 feet
Front Street Centerline Setback	45 feet	45 feet	13.4 feet
Street Centerline Setback	45 feet	45 feet	17 feet
Front Property Line Setback	20 feet	15 feet	10 feet
Street Side Setback	20 feet	15 feet	3.5 feet
Rear Property Line Setback	20 feet	10 feet	3.5 feet
Interior Side Setback	5 feet	5 feet	3 feet

With the request for concessions summarized above, the project would comply with applicable Zoning Code Development Standards of the R2 and R3 Zoning Districts. The project site is not located within an area that is subject to a specific plan, area plan, or local development guidelines. The project site is zoned with the Affordable Housing (AH) Combining District which is used to

identified as a Planned, Approved, and Pending Project per Table 9 Appendix D of the Sonoma County General Plan Housing Element, adopted August 2023. The proposed project will contribute six Low Income Housing Units, six Moderate Income Housing Units.

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

Significance Level:
No Impact.

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

Comment:
The project site is not located within an area of locally-important mineral resource recovery site and the site is not zoned MR (Mineral Resources). No locally-important mineral resources are known to occur at the site.

Significance Level:

No Impact.

13. NOISE:

Would the project:

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

Comment:

Illingworth & Rodkin prepared an Environmental Noise Assessment for the project, dated June 30, 2023 (see attachment 12). The report used the policies and objectives of the Sonoma County 2020 General Plan Noise Element as its regulatory criteria. The Noise assessment finds that all potential noise impacts generated by the project, including traffic, parking lot operations, mechanical equipment, and residential outdoor activities, would have less than significant impacts, based on measurements of ambient noise levels and the acceptable ranges established by General Plan Noise Table NE-2 and General Plan Policy NE-1b. However, the Housing Rezoning Sites EIR recommends reducing noise from HVAC systems that located within 30 feet of existing noise sensitive receptors to ensure these noise generating uses do cumulatively exceed County noise standards (see Mitigation Measure NOISE-1). Additionally, to ensure noise generated from project construction activities are mitigated to a level less than significant, Mitigation Measure NOISE-2 below has been incorporated into the project.

Residential projects are considered to be sensitive noise receptors. Sonoma County's acceptable exterior noise level objective is 60 dBA Ldn (see Noise Assessment Table 1 for definitions of acoustical terms) for residential land uses. The future noise environment at the project site will continue to result primarily from vehicular traffic along Airport Boulevard and Old Redwood Highway. Based on the SoundPLAN noise model used in the Noise Assessment, contours the noise levels at the residential facades facing Old Redwood Highway would range from 66 to 67 dBA Ldn. Residences facing Airport Boulevard would experience noise levels ranging from 67 to 70 dBA Ldn. For the private residential yards facing Old Redwood highway, noise levels would range from 61 to 62 dBA Ldn. Noise levels would range from 63 to 65 dBA Ldn at private residential yards facing Airport Boulevard. The loudest noise levels would be expected at the residential yards directly adjacent to the roadways at Lots 22 and 34 (66 to 67 dBA Ldn).

Noise levels predicted at the 'Community Common Open Space' would be about 57 dBA Ldn.

The noise modeling results summarized in Table 4 of the Noise Assessment indicate that future Ldn exposures at the facades and private outdoor residential yards exceed the Sonoma County 60 dBA Ldn limit. Using SoundPLAN, it was determined that a solid noise barrier with a height of 6 feet above the residential pad elevation would have to be constructed to enclose the private residential yards of the buildings facing Old Redwood Highway and Airport Boulevard as shown in Figure 3 of the Noise Assessment. Barriers higher than 6 feet would not provide a substantial reduction in noise levels when compared to a 6-foot barrier. For residences at Lots 22 and 34 that have their yards directly facing the roadways, an 8-foot barrier provides the most substantial noise level reduction. Table 5 of the Noise Assessment provides a summary of predicted noise levels after installation of 6 feet high barriers at locations shown in Figure 3 of the Noise Assessment.

Per Policy NE-1b of the Sonoma County General Plan where it is not possible to meet the 60 dB Ldn standard using a practical application of the best available noise reduction technology, a maximum level of up to 65 dBA Ldn may be allowed but interior noise level shall be maintained so as not to exceed 45 dBA Ldn. For this project, increasing the noise barrier height up to 20 feet would not substantially reduce noise levels as compared to a 6 feet barrier. A perimeter fence with a height of 6 feet above the residential pad elevation was also assessed as part of the sound model. This did not

provide any substantial noise reduction or increase the amount of noise reduction already achieved by a 6-foot barrier. The 65 dBA Ldn limit hence applies in this instance. Thus, an 8-foot barrier for the yards adjacent to residences at Lots 22 and 34 and 6-foot barriers for the rest are the most practical barriers with noise levels predicted to be below the County's adjusted threshold.

To be effective as a noise barrier, the walls for the residential yards must be built without cracks or gaps in the face or large or continuous gaps at the base and have a minimum surface weight of 3 lbs. per sq. ft. Acceptable materials for such walls include a 2x4 wood framed wall with wood or stucco finishes, masonry block walls, and solid wood fencing. For wood fences to meet these requirements, it is recommended that the fence be double faced with butted vertical fence boards on each side with a continuous layer of 1/2" plywood. Using plywood ensures continued effectiveness of the barrier with age, since wood slats alone tend to warp and separate with age allowing gaps to form and the barrier effect of the wall to diminish.

A previously mentioned the interior noise level must be limited in order to utilize policy NE-1b. Interior noise levels within new residential units are required to be maintained at or below 45 dBA Ldn as per the County's General Plan. Standard residential construction, assuming windows to be partially open, provides exterior-to-interior noise reduction of approximately 15 dBA. With the standard thermal insulating windows maintained closed, typical California residential construction normally provides an average noise reduction of about 25 dBA from the building exterior to its interior spaces. Thus, where exterior noise levels are 60 dBA Ldn or less, standard construction with windows in the open or closed position would be anticipated to be sufficient to reduce interior levels to 45 dBA Ldn or less. Where exterior noise levels range from 60 to 65 dBA Ldn, the inclusion of adequate forced-air mechanical ventilation is often the method selected to reduce interior noise levels to acceptable levels by allowing occupants the option of closing the windows to control noise. Where noise levels exceed 65 dBA Ldn, forced-air mechanical ventilation systems and sound-rated construction methods may be required.

The SoundPLAN noise modeling results indicate that the facades of the residences directly facing either Old Redwood Highway or Airport Boulevard would experience noise levels ranging from 66 to 70 dBA Ldn. Based on a review of the building plans and elevation documents, the exterior walls of each residence are assumed to be wood stud framed walls with cavity insulation. This would give the exterior walls an STC rating of 39. Considering these exterior walls on each façade of the five different plan types proposed, the following STC ratings are recommended for doors and windows (Table 6) to achieve an interior noise level of 45 dBA Ldn or lower. In addition to the STC ratings of doors and windows recommended below, forced-air mechanical ventilation systems are required for all residences directly facing any of the roads to provide an acceptable amount of fresh air in these homes with windows closed.

For all other residences not directly facing either Old Redwood Highway or Airport Boulevard, standard construction windows and doors can be used to ensure an interior noise level of 45 dBA Ldn or lower.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation Measure NOISE-1 HVAC:

For any individual project on a Rezoning Site that would place one or more HVAC unit(s) within 30 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of the HVAC unit(s) shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses, listed in Table 4.13 4. The analysis shall be completed in accordance with the County's current Guidelines for the Preparation of Noise Analysis. Noise control measures shall include, but are not limited to, the selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.

Mitigation Monitoring NOISE-1:

The Design Plan shall be submitted concurrently with final Design Review and prior to the approval of building permits. The Design Plan shall demonstrate that the noise level from the operation of the HVAC units shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses for HVAC units placed within 30 feet of an existing noise-sensitive receiver.

Mitigation Measure NOISE-2 Construction:

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 5:00 p.m. on weekdays and 9:00 a.m. and 5:00 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 start up 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 5:00 p.m, Monday through Friday or prior to 9:00 a.m. nor past 5:00 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 5:00 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 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.

Mitigation Monitoring NOISE-2:

PRMD Project Review Division 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. PRMD staff shall inspect the site prior to construction to assure 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. (Ongoing)

Mitigation Measure NOISE-3:

To ensure exterior noise levels at the private residential yards of homes facing Old Redwood Highway and Airport Boulevard meet the County's adjusted limit of 65 dBA Ldn, a noise barrier wall with a minimum height of 6-feet is required. For residences on Lots 22 and 34, a minimum height of 8 feet is required for the private yards. This wall should be built without cracks or gaps in the face or large or continuous gaps at the base and have a minimum surface weight of 3 lbs. per sq. ft. No mitigation is needed for other outdoor community areas.

Mitigation Monitoring NOISE-3:

Permit Sonoma Project Review staff shall ensure that the noise barriers are shown on the building plans in the referenced locations.

Mitigation Measure NOISE-4:

To ensure interior noise levels within all homes in the residential development are maintained below 45 dBA Ldn, residences adjacent to roadways should follow the recommended STC rating for doors and windows as per Table 6 of the Illignsworth and Rodkin June 30, 2023 Noise Assessment. For these residences, forced-air mechanical ventilation shall be provided to allow residents of these homes to keep their windows closed for the purpose of noise control. In our experience a standard central air conditioning system or a central heating system equipped with a 'summer switch' which allows the fan to circulate air without furnace operation will provide a habitable interior environment with closed windows.

Mitigation Monitoring NOISE-4:

Permit Sonoma Project Review staff shall ensure that a forced air ventilation system is shown on the building plans applicable residential units.

Mitigation Measure NOISE-5:

Standard building construction materials can be used for all other residences that are located in the interior of the site plan which are not directly adjacent to the roadways. These residences would benefit from shielding due to residences located on the outer side of the site plan. Forced-air mechanical ventilation would not be needed for these homes.

Mitigation Monitoring NOISE-5:

Permit Sonoma Project Review staff shall ensure building construction materials are shown on the building plans for all residential units.

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

Comment:

The project includes construction activities that may generate ground-borne vibration and noise. These noise 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.

Mitigation Measure NOISE-2 above ensures noise generated from construction will not result in a significant impact.

Significance Level:

Less than Significant Impact with Mitigation.

Mitigation Measure: See NOISE-2 above.

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

Comment:

The project site is not located in the vicinity of an airport land use zone and would not expose people residing or working in the project area to excessive aircraft noise levels.

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 project will include 57 additional units of housing, which can be expected to add 134.52 new persons at build-out (57 new housing units x 2.36 persons per household). The project is within the projected population growth of the county's General Plan and is therefore less than significant.

Significance Level:

Less than Significant Impact.

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

Comment:

The project site contains no existing habitable residences. 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:**

- i. **Fire protection?**

Comment:

Construction of the project would not involve substantial adverse physical impacts associated with provision of public facilities or services and the impact would be less than significant. The project will include 57 additional units of housing, which can be expected to add 134.52 new persons at build-out (57 new housing units x 2.36 persons per household). The project is within the projected population growth of the County's General Plan and would not require or facilitate construction of new public facilities.

The Sonoma County Fire Protection District will continue to serve this area. There will be no increased need for fire protection resulting from the project. Sonoma County Code requires that all new development meet County Fire Code (Chapter 13). This is a standard condition of approval and required by County code and impacts would be less than significant.

Significance Level:

Less than Significant Impact.

ii. Police?

Comment:

The Sonoma County Sheriff will continue to serve this area. There will be no increased need for police protection resulting from the project. As discussed in 15(a)(i) above, the project is within the projected population growth of the County's General Plan and would not require or facilitate construction of new public facilities.

Significance Level:

Less than Significant Impact.

iii. Schools?

Comment:

As discussed in 15(a)(i) above, the project is within the projected population growth of the County's General Plan and would not require or facilitate construction of new public facilities. 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 residential developments. No new schools are reasonably foreseeable as a result of this development.

Significance Level:

Less than Significant Impact.

iv. Parks?

Comment:

Sonoma County Code, Chapter 23 requires payment of parkland mitigation fees for all new residential development for acquisition and development of added parklands to meeting General Plan Objective OSRC-17.1 to "provide for adequate parkland and trails primarily in locations that are convenient to urban areas to meet the outdoor recreation needs of the population..." Development fees collected by Sonoma County are used to offset potential impacts to public services, including park mitigation fees. As discussed in 15(a)(i) above, the project is within the projected population growth of the County's General Plan and would not require or facilitate construction of new public facilities. The project will not result in the need for any new park facilities, and demand for parks in general is addressed through fees.

Significance Level:

Less than Significant Impact.

v. Other public facilities?

Comment:

The project will receive municipal sewer from the Sonoma County Water Agency and water from the California American Water's Larkfield system through the Utility Certificate process. A 21-inch sewer line and 12-inch water line exist in the section of Airport Boulevard along the project frontage. The lines are sufficient to serve the project.

Connection fees for sewer and water services offset potential impacts to these service facilities within their respective spheres of influence for projects proposing land uses that are consistent with the General Plan. Ongoing development and maintenance costs for services are provided in the form of fees or parcel tax. Existing sewer and water facilities are adequate. Expanded facilities are not currently reasonably foreseeable.

As discussed in 15(a)(i) above, the project is within the projected population growth of the County's General Plan and would not require or facilitate construction of new public facilities.

Significance Level:

Less than Significant Impact.

16. RECREATION:

Would the project:

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

Comment:

The project proposes the construction of 57 residential units, which equates to approximately 134.52 new people. The project and population generated would not cause or accelerate substantial physical deterioration of parks or recreational facilities or require the construction of a new recreation facility. Park impact fees help offset the costs of developing recreational facilities. This potential impact is considered less than significant.

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 project include a open space common use area consistent with the requirements of zoning ordinance. The nearest regional parks are Maddux Regional Park and Shiloh Ranch Regional Park approximately .5 miles and .8 miles away respectively. A 57-unit residential project is not of sufficient size to require construction or expansion of existing park facilities. As discussed, a standard condition of approval will require the payment of impact fees that will fund new and existing recreational facilities offsite.

Significance Level:

Less than Significant Impact.

17. TRANSPORTATION:

Would the project:

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

Comment:

W-Trans prepared a Traffic Impact Study, dated December 1, 2023 (see attachment 13), consistent with the County's Guidelines and the scope of work requested by the Sonoma Public Infrastructure. The study area consisted of the section of Airport Boulevard fronting the project site and the intersections of Airport Boulevard/US 101 South Ramps, Airport Boulevard/US 101 North Ramps, Airport Boulevard/ Fulton Road, and Airport Boulevard/Old Redwood Highway. The Traffic Study concludes the following:

- The project would be expected to generate an average of 502 new trips per day, including 40 trips during the weekday a.m. peak hour and 51 trips during the weekday p.m. peak hour.
- Adequate sight distances are available at the project driveway locations. A left-turn lane would not be warranted at the proposed driveway location on Old Redwood Highway.
- While queues extend out of dedicated turn lanes under volumes without the project, the back of queue would not extend into a visually restricted area as a result of adding project-generated trips under existing or future a.m. or p.m. peak hour volumes. The project therefore has a less-than-significant impact on queuing.
- The intersections of Airport Boulevard/US 101 South Ramps and Airport Boulevard/US 101 North Ramps are currently operating acceptably during both the morning and evening peak hours, while the intersections of Airport Boulevard/Fulton Road and Airport Boulevard/Old Redwood Highway currently operate acceptably during the morning peak hour but unacceptably during the evening peak hour and would continue doing so with or without project-added trips.
- Airport Boulevard/Fulton Road is expected to operate unacceptably under future volumes during both the morning and evening peak hours. Airport Boulevard/Old Redwood Highway is expected to operate unacceptably during the evening peak hour under future volumes. Airport Boulevard/US 101 North Ramps and Airport Boulevard/US 101 South Ramps are expected to operate acceptably during the morning and evening peak hours under future volumes. Project-added trips are expected to have an acceptable effect on the study intersection.
- Access for pedestrians is expected to improve with the addition of the sidewalks and lighting proposed along the site's frontages on Airport Boulevard and Old Redwood Highway which would meet demand for pedestrian facilities and be consistent with County policy. Bicycle access would be maintained by the restriping of the existing bike lane on Airport Boulevard along the project frontage.
- The project as proposed is likely to create little additional demand for transit and as such is expected to have a less-than-significant impact on transit. The project would result in the construction of a pullout that could be used for a future transit stop, but there are currently no plans for any transit routes along Airport Boulevard.
- The study found transit, bicycle and pedestrian facilities to be sufficient. The project as proposed would not conflict with any County policies on pedestrian, bicycle, or transit facilities resulting in a less-than-significant impact on these facilities.

Significance Level:

Less than Significant Impact.

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

Comment:

The Vehicle Miles Traveled (VMT) associated with a project is the basis for determining traffic impacts under CEQA because SCTA has not yet adopted a standard of significance for evaluating VMT, guidance provided by the California Governor's Office of Planning and Research (OPR) in the publication Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory, 2018, was used. This document indicates that a residential project generating vehicle travel that is 15 or more percent below the existing citywide residential VMT per capita may indicate a less-than-significant transportation impact.

Based on data from the recently updated SCTA travel demand model, the County of Sonoma has a baseline average residential VMT of 16.60 miles per capita. Applying OPR's guidance, a residential project generating a VMT that is 15 percent or more below this value, or 14.11 miles per capita, would have a less-than-significant VMT impact. The SCTA model includes traffic analysis zones (TAZ) covering geographic areas throughout Sonoma County. The 175 Airport Boulevard project site is located within TAZ 112, which has a baseline VMT per capita of 9.94 miles. Thus, the project would have a less-than-significant impact on VMT.

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:

Sight distance along Airport Boulevard and Old Redwood Highway at the project driveways were evaluated based on sight distance criteria contained in A Policy on Geometric Design on Highways and Streets published by American Association of State Highway and Transportation Officials (AASHTO) as well as County Standard 812. The recommended sight distances for minor street approaches that are a driveway are based on stopping sight distance, with the approach travel speed used as the basis for determining the recommended sight distance. Additionally, the stopping sight distance needed for a following driver to stop if there is a vehicle waiting to turn into a side street or driveway is evaluated based on stopping sight distance criterion and the approach speed on the major street.

Since Airport Boulevard and Old Redwood Highway have different posted speed limits, they also have different minimum stopping sight distances. Based on a posted speed limit of 40 mph on Airport Boulevard, the minimum stopping sight distance is 305 feet. Old Redwood Highway has a posted speed limit of 35 mph, resulting in a minimum stopping sight distance of 250 feet.

Field measurements indicate that sight distance at the project driveway on Airport Boulevard is more than 360 feet in both directions, which exceeds the stopping sight distance needed for five mph above the posted speed limit. The sight distance at the project driveway location on Old Redwood Highway was field-measured at more than 305 feet in both directions, which exceeds the stopping sight distance for five mph over the posted speed limit. Sight distances at both driveways are therefore adequate.

While sight lines are currently clear, care should be taken to maintain unobstructed sight lines during the design and construction of the project driveways, and placement of signage, monuments, or other structures should be avoided within the sight triangles at the project driveways. Any landscaping in the vision triangle should be lower than three feet tall for ground cover and tree canopies trimmed to be seven feet above the pavement surface. Based on a review of the site plan sight lines are expected to be adequate at the proposed driveways.

W-Trans Traffic Impact Study dated December 1, 2023 finds that both driveways have stopping sight distance that exceeds the minimum requirements for five mph over the posted speed limits on the two street frontages. The design for frontage amenities such as signing or landscaping should ensure that the vision triangle remains free of objects that would impact sight lines. Project conditions of approval

required by Sonoma Public Infrastructure require the Applicant shall maintain all existing and proposed vegetation fronting the site as well as within the public right-of-way to preserve the sight distance triangles necessary to achieve the minimum County required sight distance at any project driveway where it intersects a public roadway.

Significance Level:

Less than Significant Impact.

d) Result in inadequate emergency access?

Comment:

Development on the site must comply with all emergency access requirements of the Sonoma County Fire Safety Code (Sonoma County Code Chapter 13), including emergency vehicle access requirements. The project plans include a new emergency vehicle access point off of Old Redwood Highway, additionally the project development plans are required to be reviewed by Permit Sonoma Fire Prevention Division and Fire Inspector during the building permit process to ensure compliance with emergency access issues.

Significance Level:

Less than Significant Impact

e) Result in inadequate parking capacity?

Comment:

Vehicle and bicycle parking for the single family dwelling would be via an enclosed two-car garage. Each duet unit would have a one-car enclosed garage. There are no driveway aprons proposed so additional on-street guest parking would be provided in designated parking areas throughout the site. The project parking totals 136 parking spaces: 100 covered garage spaces, 34 uncovered "guest" spaces, and two handicap accessible spaces. All homes will include bicycle storage hooks inside the garage on walls or ceiling areas and electric vehicle charging outlets for easy connection of an electric vehicle charger. The proposed 136 parking spaces is consistent with Sonoma County's Parking Regulations (Sec. 26-86-010 of the Zoning Code) which requires one covered space for each single family dwelling unit and two covered spaces for each duplex (duet).

Significance Level:

No Impact.

18. TRIBAL CULTURAL RESOURCES:

State Regulations

CEQA requires that a lead agency determine whether a project could have a significant effect on historical resources and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). A historical resource is one listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR, PRC Section 21084.1), a resource included in a local register of historical resources (PRC Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (PRC Section 15064.5[a][3]).

If a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to permit any or all these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC, Section 21083.2[a], [b], and [c]).

Impacts to significant cultural resources that affect the characteristics of any resource that qualify it for the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR are

considered a significant effect on the environment. These impacts could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (*CEQA Guidelines* Section 15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion or eligibility for inclusion in the CRHR (*CEQA Guidelines* Section 15064.5[b][2][A]).

California Public Resources Code

Section 5097.5 of the California PRC states:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

As used in this PRC section, “public lands” means lands owned by or under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, local agencies are required to comply with PRC 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

Codes Governing Human Remains

The disposition of human remains is governed by Health and Safety Code Section 7050.5 and PRC sections 5097.94 and 5097.98 and falls within the jurisdiction of the Native American Heritage Commission (NAHC). If human remains are discovered, the county coroner must be notified within 48 hours, and there should be no further disturbance to the site where the remains were found. If the coroner determines the remains are Native American, the coroner is responsible to contact the NAHC within 24 hours. Pursuant to PRC Section 5097.98, the NAHC will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

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:

On July 31, 2023, Assembly Bill 52 Project Notifications were sent to the Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Torres Martinez Desert Cahuilla Indians, Mishewal Wappo Tribe of Alexander Valley, Middletown Rancheria Band of Pomo Indians, Lytton Rancheria of California, Kashia Pomos Stewarts Point Rancheria and Federated Indians of Graton 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. No requests for consultation were received.

As mentioned in the discussion of section 5(a), Tom Origer & Associates conducted a cultural resources evaluation of the project site, and no tribal cultural resources were found on the site. The project site

presents a moderate probability of there being buried resources within the study area and could uncover such materials during construction. Consistent with the CEQA guidelines, Mitigation Measure TCR-1 and TCR-2 has been incorporated into the project to ensure accidental discoveries are mitigated to a less than significant impact.

Significance Level:

Less than Significant with Mitigation Incorporated

Mitigation Measure TCR-1:

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

NOTE ON MAP/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 (Permit Sonoma) – 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 Permit Sonoma. Paleontological resources include fossils of animals, plants or other organisms. Prehistoric resources include humanly modified stone, shell, or bones, hearths, firepits, obsidian and chert flaked-stone tools (e.g., projectile points, knives, choppers), midden (culturally darkened soil containing heat-affected rock, artifacts, animal bone, or shellfish remains), stone milling equipment, such as mortars and pestles, and certain sites features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe. Historic resources include all by-products of human use greater than fifty (50) years of age including, backfilled privies, wells, and refuse pits; concrete, stone, or wood structural elements or foundations; and concentrations of metal, glass, and ceramic refuse.

If human remains are encountered, work in the immediate vicinity shall be halted and the operator shall notify 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:

Building/grading permits shall not be approved for issuance by Permit Sonoma staff until the above note is printed on the subdivision improvement plans, the recorded subdivision map, and future building/grading permit plans on the project site.

Mitigation Measure TCR-2: If archaeological resources are encountered during ground-disturbing activities, work within 60 feet shall be halted and the project applicant shall retain an archaeologist meeting the SOI's PQS for archaeology (National Park Service 1983) immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Any reports required to document and/or evaluate unanticipated discoveries shall be submitted to the County for review and approval. Recommendations contained therein shall be implemented throughout the remainder of ground disturbance activities.

Mitigation Monitoring TCR-2:

In the event of accidental discovery, Permit Sonoma shall review and approve any reports required to document and/or evaluate unanticipated discoveries and verify that recommendations contained in are implemented throughout the remainder of ground disturbance activities.

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 not contribute to the need for construction or expansion of new water or wastewater treatment facilities as proposed. The existing sewer system has been deemed adequate to serve the proposed project as outlined in the obtained Will Serve letter, for sewer services and likewise adequate potable water service.

The County of Sonoma has adopted the City of Santa Rosa's Storm Water LID Determination Sheet, which is utilized in developing the project's Initial Storm Water Low Impact Development report. The report, worksheet and preliminary grading plan constitute the project's Standard Urban Storm Water Mitigation Plan (SUSMP). The County's SUSMP requires projects to design and implement post-development measures to reduce the potential storm water impacts to local drainages.

No new natural gas connections are proposed with the project. The proposed project would be served with electricity generated by Sonoma Clean Power and delivered by PG&E.

Significance Level:

Less than Significant Impact.

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

Comment:

The project is located within the California American Waters Larkfield System and has obtained a Will-Serve Letter from the public utility. The project will have sufficient water supplies available to serve the project for the reasonably foreseeable future development during normal, dry and multiple dry years.

Significance Level:

Less than Significant Impact.

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

Comment:

Sewage treatment will be provided by an off-site provider with sufficient capacity to treat 57 additional housing units, and the project has received a Will-Serve letter from Sonoma Water. The project has proposed to connect to the existing sewer trunk on Airport Boulevard, which has been determined to have the capacity to treat the proposed project,

Significance Level:
Less than Significant 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 57 additional dwelling units 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?**
As discussed in section 9, the project site is not within or immediately near a Fire Hazard Severity Zone, and is within a Local Responsibility Area. There is no adopted emergency response plan or an emergency evacuation plan for this area with which the project could conflict.

Significance Level
No 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 discussed in section 9, the project site is not within a Fire Hazard Severity Zone, and within a Local Responsibility Area. Topography, weather, and fuel (vegetation or structures) contribute to wildfire risk and behavior.⁹ The project site has gentle to moderate slopes between 0-20 percent, which are unlikely to significantly exacerbate wildfire risk. Strong north-east "Santa Ana" winds can increase the severity of wildland fire in the fall months. During fire season, gradient winds are generally out of the south/southwest at 5-10 mph, strengthening to 10-15 mph in the late afternoon. These prevailing wind conditions are common in Sonoma County. Potential wildfire fuel sources

⁹ Fire Safe Sonoma, "Sonoma County Community Wildfire Protection Plan", September 20, 2016, <https://www.firesafesonoma.org/wp-content/uploads/cwpp-final.pdf>

include grasslands, trees, vegetation, and structures (residential). As discussed in section 9, application of County fire safe standards will offset any increased wildfire risk presented by prevailing winds or onsite fuel to a less than significant level.

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:

As discussed in section 9, the project site is not within or immediately near a Fire Hazard Severity Zone, and is within a Local Responsibility Area, and does not require installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk as the surrounding area is developed with these features in place.

Significance Level:

No 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:

The project site is not located in an area at high risk for flooding, such as a 100-year flood hazard area. Additionally, all proposed drainage must be in compliance with Sonoma County Storm Water Quality Ordinance and incorporate Low Impact Development (LID) Best Management Practices (BMPs). LID is a site design strategy of BMPs that mimics the pre-development site hydrology. To this end, the project will collect overland flow and route it to a series of proposed stormwater treatment facilities before entering the underground drainage system. These features will be constructed over aggregate layers where stormwater will be retained. This pretreatment design feature will not only remove pollutants, but also will reduce the amount of runoff by capturing and infiltrating storm water onsite. The treatment facilities are proposed at various locations throughout the project site which will ensure that runoff is treated and not increase runoff exposing people or structures to significant downslope flooding.

The project site is located in urbanized flatland area and is not located within a deep-seated landslide hazard area or on a mapped landslide complex or debris flow source area. It is unlikely that a landslide would occur on-site as a result of runoff, post-fire slope instability, or drainage changes. Therefore, it is not anticipated that the project would expose people or structures to significant risks including flooding or landslides as a result of runoff, post-fire instability, or drainage changes.

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?**

Potential project impacts on special status plant species, special status animal species, nesting birds, wetlands habitat, and tree removal are addressed in Section 4. Implementation of the required mitigation measures (Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, BIO-8, BIO-9, and BIO-10) would reduce these potential impacts to a less-than-significant level. Potential adverse project impacts to cultural resources are addressed in Section 5 and Section 18a which requires mitigation to ensure that cultural or archaeological resources are protected if unearthed during ground disturbing activities (Mitigation Measure TCR-1, and TCR-2).

Significance Level:

Less than Significant Impact

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

Comment:

No project impacts have been identified in this Initial Study that are individually limited but cumulatively considerable. The project would contribute to impacts related to aesthetics, air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, noise and tribal resources (Mitigations Measures VIS-1, AIR-1, BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, BIO-8, BIO-9, BIO-10, GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, NOISE-1, NOISE-2, NOISE-3, NOISE-4, NOISE-5, TCR-1, and TCR-2) which may be cumulative off-site, but mitigations would reduce project impacts to less-than-significant levels.

Significance Level:

Less than Significant Impact

- 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 aesthetics, air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, noise and tribal resources (Mitigations Measures VIS-1, AIR-1, BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, BIO-8, BIO-9, BIO-10, GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, NOISE-1, NOISE-2, NOISE-3, NOISE-4, NOISE-5, TCR-1, and TCR-2), were analyzed, and would be less than significant with the mitigations identified in the Initial Study incorporated into the project.

Significance Level:

Less than Significant Impact

Attachments

1. Architecture Plans
2. Tentative Map
3. Visual Assessment Guidelines
4. Tree Inventory Report
5. Lighting Study and Cut Sheets
6. Biological Resource Assessment
7. Geotechnical Report 2003
8. Geotechnical Report 2023
9. GHG Assessment
10. Drainage Report
11. Preliminary SWLID Report
12. Noise Assessment
13. Transportation Impact Study
14. Mitigation Monitoring and Reporting Program from Final EIR of Housing Element Update

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4. California Department of Conservation, "EQ Zapp: California Earthquake Hazards Zone Application", Accessed January 12, 2023, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>
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