

Occidental Wastewater Transport and Treatment Project

INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION



October 31, 2019

Initial Study/Proposed Mitigated Negative Declaration
Graton Community Services District
Occidental Wastewater Transport and Treatment Project

Prepared for:



Graton Community Services District
250 Ross Lane, Sebastopol, CA 95472

Prepared by:



GHD
2235 Mercury Way, Suite 150
Santa Rosa, California 95407

October 31, 2019

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1. Project Information

Project Title	Occidental Wastewater Transport and Treatment Project
Lead Agency Name & Address	Graton Community Services District (Graton CSD) 250 Ross Lane Sebastopol, CA 95472
Contact Person & Phone Number	Jose Ortiz, PE, General Manager, Graton CSD (707) 330-3542
Project Location	4115 North Gravenstein Highway and Green Valley Road Sebastopol, CA 95472
Project Sponsor's Name & Address	Graton CSD 250 Ross Lane Sebastopol, CA 95472
General Plan Land Use Designation	Rural Residential (RR 2)
Zoning	Agriculture and Residential District, Combining District B6 (AR B6 2) Local Guidelines Combining District, Highway 116 Scenic Corridor (LG/116 SR)

1.1 Introduction

The Graton CSD, serving as the California Environmental Quality Act (CEQA) Lead Agency, has prepared this Initial Study to provide the public, responsible agencies, and trustee agencies with information about the potential environmental effects of the Graton CSD Occidental Wastewater Transport and Treatment Project. Graton CSD is a local government agency that manages the public sewer system in the unincorporated community of Graton in Sonoma County. Graton CSD serves about 1,700 rural residents, as well as businesses. Graton CSD also provides reclaimed water to several agricultural producers in the Graton area. Graton CSD is governed by an elected, five-member Board of Directors.

Sonoma Water (formerly known as Sonoma County Water Agency) is a special district that provides flood protection and water supply services to Sonoma and Marin Counties and manages several sanitation zones and districts in Sonoma County. The sanitation zones include Airport/Larkfield/Wikiup, Geyserville, Penngrove, and Sea Ranch. The sanitation districts include the Occidental, Russian River, Sonoma Valley, and South Park County Sanitation Districts.

1.2 Project Background

The Occidental County Sanitation District (Occidental CSD) is managed by Sonoma Water. Historically, Occidental CSD discharged secondary treated recycled water into a pond located at the headwaters of Dutch Bill Creek in Occidental during the summer and to Dutch Bill Creek during the winter. A 1997 Cease and Desist Order (CDO) from the North Coast Regional Water Quality Control

Board (NCRWQCB) directed the Occidental CSD to end discharges of secondary treated recycled water to Dutch Bill Creek by January 31, 2018. The 1997 CDO mandated the implementation of short-term solutions until a long-term capital improvement program to avoid continuous violation of waste discharge requirements is developed. Although short-term solutions are in place and the Occidental CSD is now in compliance with all regulatory requirements, Sonoma Water continues to work towards finding the most economical means of continuing to provide sanitary sewer services to the Occidental CSD while complying with the Waste Discharge Requirements adopted in Order R1-2012-0101 and CDO No. R1-2012-0102.

A series of potential alternatives presented over the course of two decades failed to gain community support or provide a viable economic option. After analyzing costs for facility modifications associated with wastewater transport compared to costs associated with treatment upgrade alternatives, Sonoma Water determined that annual operations and maintenance costs of wastewater transport to other sanitation facilities for treatment, storage, and disposal would be lower than operations and maintenance costs for facility upgrades. In addition, it was determined that there would be a lesser environmental impact with transporting wastewater compared to upgrading facilities. Therefore, in 2018, Sonoma Water decommissioned the Occidental CSD wastewater treatment facilities, constructed a truck fill/transfer station at the Occidental CSD's Lift Station on Occidental-Camp Meeker Road, and began trucking Occidental CSD's untreated wastewater 18 miles to the Airport-Larkfield-Wikiup Sanitation Zone (ALWSZ) wastewater treatment facility (WWTF) near the Town of Windsor. During heavy rainfall events when inflow to the Occidental CSD's Lift Station exceeds the storage capacity of the lift station, untreated wastewater is stored at the Occidental CSD's former wastewater treatment facility. As a result, untreated wastewater from the Occidental CSD is also transported, though less frequently, from the Occidental CSD's wastewater treatment facility located on Lu Dan Road to the ALWSZ WWTF.

Graton CSD, in partnership with Sonoma Water, is now proposing to provide treatment, storage, and disposal of wastewater from Sonoma Water's Occidental CSD over a 10-year agreement period. Whereas the Occidental CSD and ALWSZ are managed by Sonoma Water, the Graton CSD is a separate, independent, local government agency responsible for operating and maintaining wastewater treatment facilities in the unincorporated community of Graton. The proposed project would serve to reduce transport costs and mobile source air emissions by reducing the overall distance of wastewater transportation trips, and would help the Graton CSD solve a number of financial challenges including unstable rates, servicing a small customer base, high fixed costs for wastewater collection and treatment, and lack of revenue for future large projects.

1.3 CEQA Requirements

The purpose of this Initial Study is to provide a basis for deciding whether to prepare an Environmental Impact Report, a Mitigated Negative Declaration or a Negative Declaration. This Initial Study has been prepared to satisfy the requirements of CEQA (Public Resources Code, Div 13, Sec 21000-21177) and the CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387).

Section 15063(d) of the State CEQA Guidelines states the content requirements of an Initial Study as follows:

1. A description of the project including the location of the project;
2. An identification of the environmental setting;

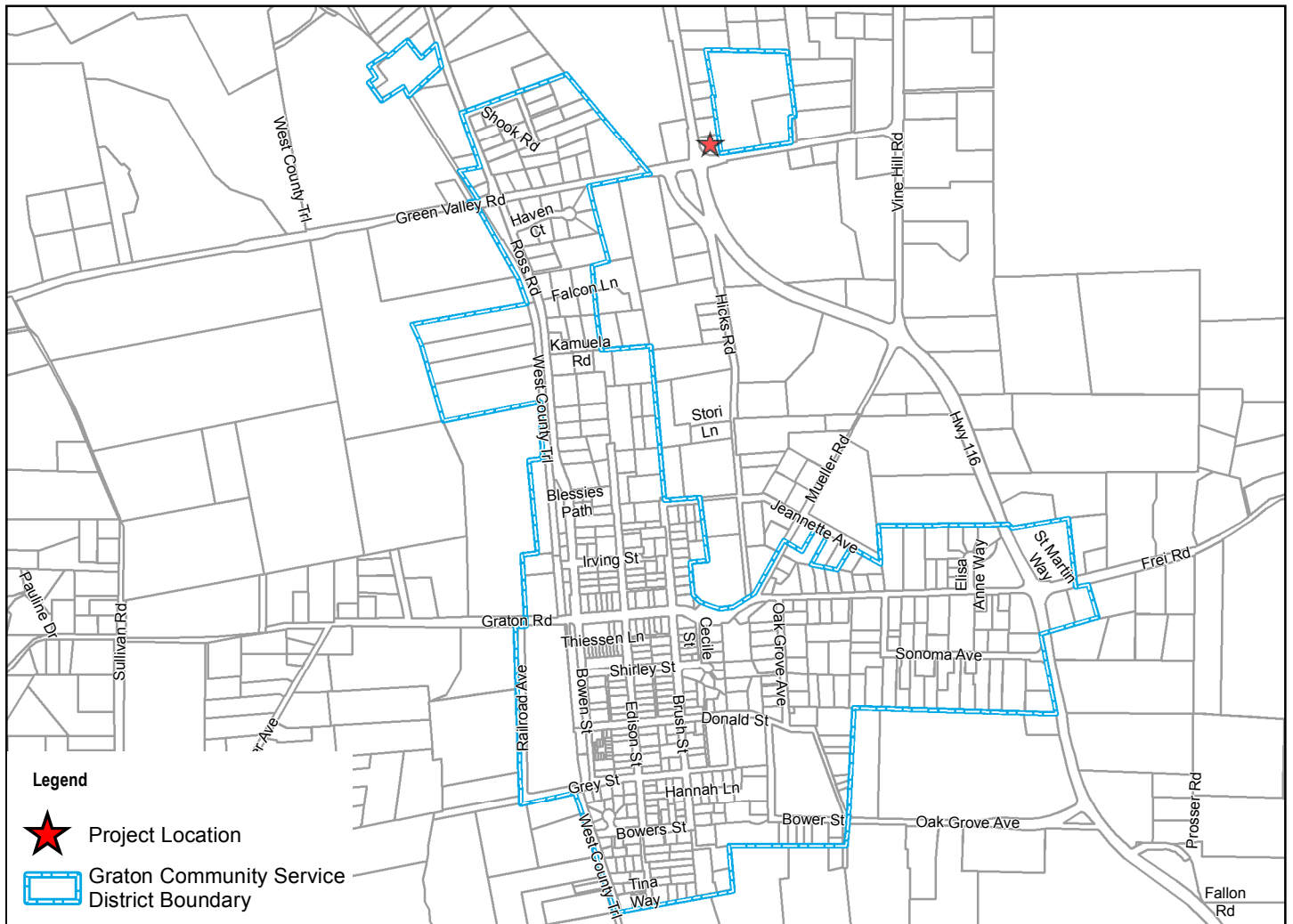
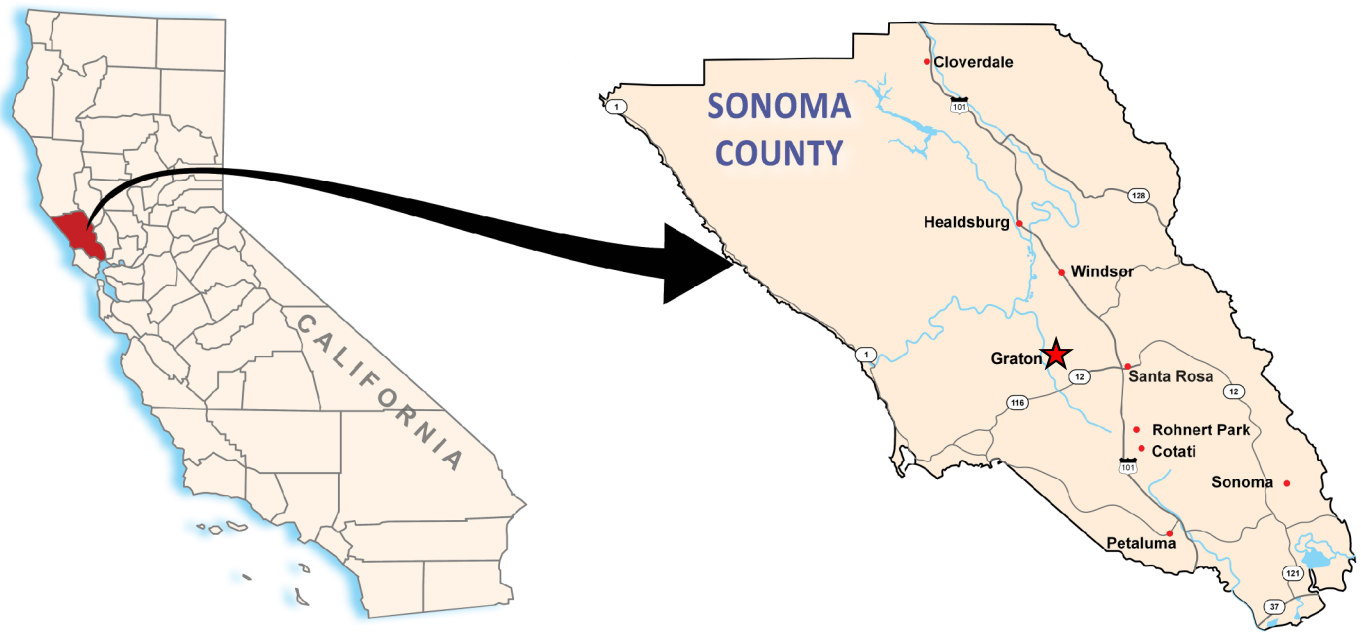
3. An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
4. A discussion of the ways to mitigate the significant effects identified, if any;
5. An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and
6. The name of the person or persons who prepared or participated in the Initial Study.

1.4 Project Location and Surrounding Land Uses

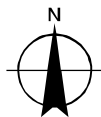
The proposed project site is located in the unincorporated community of Graton, in western Sonoma County. The project site is located adjacent to, but currently outside of, the Graton CSD service area boundary (see Figure 1, Regional Location Map).

All improvements associated with the proposed project would occur in the vicinity of 4115 North Gravenstein Highway and along Green Valley Road (see Figure 2, Proposed GCSD Improvements). The property at 4115 North Gravenstein Highway is a 0.55-acre privately-owned parcel in Sonoma County General Plan Planning Area 4 – Russian River Area and is designated as Rural Residential (RR 2). The site is currently developed as the Bridgeway Gas Station (formerly the West View Beacon Service Station). The proposed receiving station would take up an approximately 1,000-square-foot area on the eastern portion of the property. Surrounding land uses include the Blue Spruce Lodge (mobile home community) to the east and northeast, single-family residences to the north, and Dutton Estate Winery and tasting room to the south. Approximately 300 feet of sewer main would be installed in the Green Valley Road and across Highway 116 to an existing sewer manhole near Hicks Road (see Figure 2, Proposed GCSD Improvements). Existing land uses along the proposed sewer main alignment on the west side of Highway 116 include single-family residences and a private vineyard and orchard.

Wastewater transport would primarily occur between the existing Occidental CSD Lift Station at Occidental-Camp Meeker Road and the proposed new receiving station that would be located on the project site (see Figure 3, Proposed Wastewater Transportation Routes). At certain times, wastewater would continue to be transported from the Occidental CSD Lift Station to the ALWSZ WWTF near the Town of Windsor using existing established routes (see Figure 3, Proposed Wastewater Transportation Routes).



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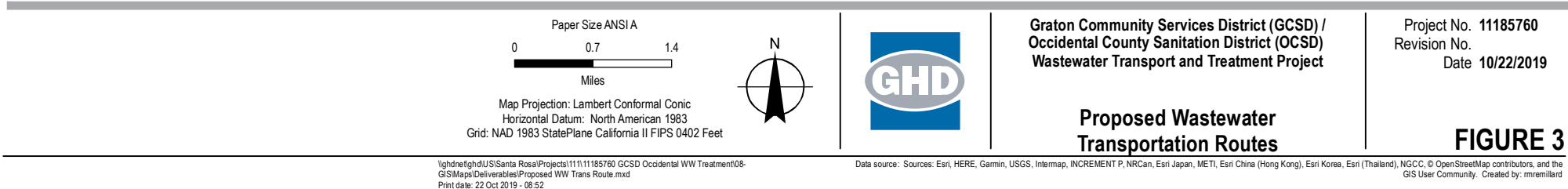
**Graton Community Services District (GCSD) /
Occidental County Sanitation District (OCSD)
Wastewater Transport and Treatment Project**

Project No. 11185760
Revision No.
Date 09/27/2019

Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
Grid: NAD 1983 StatePlane California II FIPS 0402 Feet

Regional Location Map

FIGURE 1



1.5 Project Description

The Project Description is organized as follows:

- Section 1.5.1 – Proposed Improvements
- Section 1.5.2 – Project Operations and Maintenance
- Section 1.5.3 – Project Construction

1.5.1 Proposed Improvements

New Graton CSD Wastewater Receiving Station and Sewer Main

The proposed project would include the construction of a wastewater receiving station and sewer main on previously disturbed and developed lands at 4115 North Gravenstein Highway and within Green Valley Road (see Figure 2, Proposed GCSD Improvements). Proposed improvements would include installation of above- and below-ground piping and appurtenances including a new driveway, valves, pipeline, electrical and control panels, and surveillance cameras and signage.

A new 16-foot wide concrete driveway would be installed on the eastern portion of the property that would be accessed by wastewater transport trucks off of Green Valley Road. An aboveground control box housing electrical controls and plumbing connections would measure approximately six feet in height, six feet in width, and approximately two feet in depth. Trucks would pull into the driveway and then connect to new receiving station control valves that would transfer the untreated wastewater through a closed system to a new sewer main. The receiving station would include concrete curbing and drainage to contain potential spills and would direct runoff into the wastewater collection system. The receiving station would be connected to an existing water line on the property to provide flush water, if needed. Bollards would be installed to protect the new control box and an existing power pole on the property. The receiving station would not require a new pump station or new lighting, as booster pumps on the transport trucks would provide pumping under pressure, and the receiving station would be utilized only during daytime hours.

The new sewer main would be 6-inches in diameter and would be routed south beneath the proposed new driveway to Green Valley Road. The new 6-inch sewer main would then be routed approximately 300 feet westward within Green Valley Road parallel to an existing Graton CSD 6-inch sewer main. The new sewer main would cross Highway 116 and connect to an existing manhole located near the intersection of Green Valley Road and Hicks Road. The proposed sewer main would be installed at a depth of approximately 4 to 5-feet below ground surface. Trenchless methods would be used to install the sewer main segment that would extend beneath Highway 116.

Beyond the improvements described above, no additional modifications to Graton CSD wastewater treatment facilities would be required for treatment, storage, and disposal of Occidental CSD's wastewater flows.

Change to Graton CSD Service Area to Include 4115 N Gravenstein Highway

Graton CSD proposes to change its service area boundary to include the property located at 4115 North Gravenstein Highway. The property, identified as Sonoma County Assessor's Parcel Number 130-060-009, is a 24,024 square foot (sf) (0.55 acre) site currently improved as a gasoline service station. The property is located in the unincorporated community of Graton, northwest of the City of Sebastopol. The property is located immediately adjacent to a parcel that is currently included in the Graton CSD service area (i.e., the Blue Spruce Lodge mobile home community to the east).

As part of the project, the existing Bridgeway Gas Station that operates on the property would be connected to Graton CSD's existing 6-inch sewer main located in Green Valley Road. A lateral connection to Graton CSD's existing sewer main in Green Valley Road may also be constructed for future improvements that may occur on the property, including a potential residential connection. The new sewer connections would allow for removal of an existing on-site septic tank or abandoning the tank in place in accordance with County of Sonoma requirements.

1.5.2 Project Operation and Maintenance

Agreement Between Sonoma Water and Graton CSD

The proposed project would include a 10-year agreement between Sonoma Water and Graton CSD for transferring of trucking operations to the Graton CSD and treatment and disposal of Occidental CSD's wastewater. The agreement would include Sonoma Water providing as-needed services during the operational agreement term, including training of Graton CSD staff on hauling and transferring procedures. It is anticipated that transport, treatment, and disposal of wastewater would begin in July or August of 2020.

Wastewater Transport

The project would include transport of wastewater from the Occidental CSD to the Graton CSD for treatment, storage, and disposal. The proposed transport route is shown on Figure 3 (Proposed Wastewater Transportation Routes). Transport trucks would be filled with wastewater at the Occidental CSD Lift Station. A truck would travel south on Occidental-Camp Meeker Road to Graton Road, then east on Graton Road to Highway 116 or Graton Road to Mueller Road to Highway 116, then north on Highway 116 to Green Valley Road. Trucks would turn east on Green Valley Road to access the proposed new driveway on the eastern portion of the property at 4115 North Gravenstein Highway. The proposed transport route would be approximately 7 miles in length for a one-way trip.

The transport trucks to be utilized would be 4-axle trucks with a 4,200-gallon vacuum tank and 500 cubic feet per minute pumping system with pressure relief valves. The trucks would be 30 feet in length and approximately 15,914 pounds. The trucks would have 2017 EPA emission engines and back up alarms. The process of transferring wastewater from a transport truck to the proposed Graton CSD receiving station would require approximately 10 to 15 minutes per truck. During this time, a truck would idle for approximately 5 minutes in order to pump wastewater under pressure.

Transport of wastewater from the Occidental CSD to the proposed new Graton CSD receiving station would be scheduled to occur on a weekday (Monday through Friday) between 7 a.m. and 5 p.m. It is anticipated that transport to the proposed Graton CSD receiving station would occur approximately 3 to 5 days per week. On a day when wastewater transport occurs, approximately 5 to 10 trips would typically occur, however, there could be additional daily trips to reduce the number of transport days during a week, or during wet weather events. On average, 30 trips per week would occur during dry weather periods. Transport of wastewater to the proposed Graton CSD receiving station would not be scheduled on weekends or after 5 p.m. on a weekday.

When transport of wastewater is required outside of scheduled hours, or during peak wet weather periods when flows exceed Graton CSD's capacity to treat, wastewater would be transported to Sonoma Water's ALWSZ WWTF located near the Town of Windsor. During an average rainy season and year, it is anticipated that hauling to the ALWSZ WWTF would be required on less than 30 days of the year. Such days would typically occur when daily average inflow to the Graton CSD WWTP is greater than 200-300 gallons per minute (gpm).

The existing wastewater transportation route from the Occidental CSD to the ALWSZ is approximately 18 miles for a one-way trip. Therefore, once completed, the project would reduce one-way trip lengths by 11 miles compared to baseline conditions.

Operation and Maintenance of Graton CSD WWTP

The Graton CSD operates in accordance with Waste Discharge Requirements and NPDES Permit No. CA0023639 established by Order No. R1-2018-0001 and currently treats wastewater to Title 22 disinfected tertiary recycled water standards as its primary treatment mode. During the wet season (October 1 through May 14), the Graton CSD discharges treated effluent to Atascadero Creek at rates not exceeding one percent of the creek flow. During the dry season (May 15 through September 30), the recycled water is used for agricultural irrigation whenever possible or disposed of by irrigation on a 21-acre Graton CSD-owned parcel.

The proposed project would not require any modifications to Graton CSD's wastewater treatment facilities. Routine operation and maintenance of the treatment, storage, and disposal facilities at the Graton CSD's wastewater treatment, reclamation, and disposal facility would remain similar to current levels. Routine operation and maintenance of the new Graton CSD receiving station would occur on an annual or as needed basis. Vehicles utilized for the transport of wastewater would be staged and maintained at the Graton CSD WWTP when not in use. The project is anticipated to create the equivalent of up to 1 new full-time Graton CSD employment opportunity for a truck driver.

Operations and Maintenance of Occidental CSD Lift Station and Former WWTP

Operational activities would include the continued collection and storage of untreated wastewater at the Occidental CSD Lift Station and former wastewater treatment facility, including aeration at the former wastewater treatment facility to prevent odors. The existing Occidental CSD Lift Station would continue to function as a collection and short-term storage system and would have operations and maintenance activities similar to existing activities. Sonoma Water would continue to perform operation and maintenance activities at these facilities.

Maintenance activities would include continued routine maintenance of the plumbing and electrical systems associated with the collection and storage facilities. Maintenance would also include routine management and maintenance of the plumbing and electrical systems associated with the truck filling and receiving activities.

1.5.3 Project Construction

Construction Schedule

Construction of the project is expected to begin in Spring 2020 and require approximately 3 months to complete. Construction activities would generally occur between 7:00 a.m. and 5:00 p.m. on weekdays. The work hours for construction of the proposed new sewer main beneath Highway 116 would be subject to utility encroachment permit conditions with the California Department of Transportation (Caltrans). To be conservative, this Initial Study presumes that Caltrans may require nighttime construction for a trenchless Highway 116 undercrossing. Anticipated nighttime work hours are assumed to be 7:00 p.m. to 7:00 a.m. Based on the type and extent of trenchless work to be performed, construction could require up to 5 nighttime work periods for the Highway 116 undercrossing.

Construction Staging and Equipment

Prior to construction, the contractor would mobilize resources to a staging area that would be located on a portion of the property at 4115 North Gravenstein Highway (See Figure 2, Proposed GCSD Improvements). A variety of construction equipment would be used to build the project, including backhoes, excavators, pile driver, paving equipment, welding equipment, concrete truck, dump truck, water truck, utility trucks, air compressors, and power hand tools including a pavement saw and jack hammer.

The primary construction-related vehicle and haul truck route to the project site is anticipated to be Highway 116 to Green Valley Road. The number of construction-related vehicles traveling to and from the project areas would vary on a daily basis. It is anticipated that up to 8 round trip haul truck trips could occur during peak construction periods. In addition, it is anticipated that construction crew trips would require up to 8 round trips vehicle trips per day.

Pipeline Construction

The construction corridor for the proposed new sewer main would be approximately 12 feet wide at its widest extent (i.e., tunneling pits). The new sewer main would be installed within the County road right-of-way within Green Valley Road and the Caltrans right-of-way within Highway 116.

The proposed new sewer main would primarily be installed using conventional open-trench methods. Open-trench methods would typically include excavating the trench, preparing and installing pipeline sections and other pipeline components, backfilling the trench with non-expansive fills, and restoring and re-paving the pipeline alignment. Trenchless methods such as jack-and-bore would potentially be used to install the proposed new sewer main segment across Highway 116. The jack-and-bore method entails excavating a sending pit and receiving pit at either end of the pipe segment. An auger boring machine is then used to drill a hole, and a hydraulic jack is used to push a casing through the hole to the opposite pit. For the crossing of Highway 116, the sending pit would be approximately 12-feet wide and 30-feet long, and the receiving pit would be approximately 12-feet wide and 12-feet long. The pits would be excavated to a depth of approximately 5 to 7 feet. Shoring for the sending and receiving pits would be installed to approximately 5 to 10 feet below the bottom of the pit excavations.

Construction Traffic Control

Construction of the new sewer main within Green Valley Road would take place within a County of Sonoma right-of-way requiring a partial lane closure and encroachment permit. Construction of the new sewer main across Highway 116 would occur within a Caltrans right-of-way and require a utility encroachment permit. As part of the encroachment permit process, Graton CSD and its construction contractor would be required to prepare traffic control plans for review and acceptance of planned work within the County and Caltrans right-of-way. This would include information on the lengths and widths of work zones, tapers and sign spacing, and all lanes to be used, reduced, or left open. The development and implementation of traffic control plans may also include, but not necessarily be limited to:

- Traffic controls, signs, and flaggers required for conformance with the current California Manual of Uniform Traffic Control Devices;
- Pedestrian and bicycle control devices;
- Notifications/arrangements for any driveway access restrictions;
- Notifications to emergency responders and public transit agencies;

- Scheduling of major lane closures during off-peak hours; and
- Detour routes, if needed.

Groundwater Dewatering (If Required)

If needed, temporary groundwater dewatering would be conducted to provide a dry work area during construction-related excavations. Dewatering would involve pumping water out of a trench into a Baker tank (or other similar type of settling tank). Following the settling process provided by a tank, groundwater would typically be pumped to a bag and cartridge filter system (or similar system) before being discharged to the sanitary sewer system.

1.6 Required Agency Approvals

The following discretionary actions and other approvals from the Graton CSD may be required for the project:

- Sonoma Water Agreement: The proposed project would include a 10-year agreement between Graton CSD and Sonoma Water for transferring of trucking operations and treatment and disposal of Occidental's CSD's wastewater.
- Service Area Expansion: The proposed project would include a change to the Graton CSD service area to include the property located at 4115 North Gravenstein Highway.
- Easement with Property Owner: The proposed project would include a 10-year temporary easement affecting an approximately 1,000 square foot portion of APN 130-060-009 located at 4115 North Gravenstein Highway. The easement would allow for aboveground access as well as an underground pipeline connection.

Table 1 lists other regulatory agencies that may have permitting or approval authority over certain aspects of the project.

Table 1-1 Required Permits and Authorizations

Agency	Requirement	Trigger
Sonoma Water	10-year Agreement for Transfer of Trucking Operations	Operating agreement with Graton CSD
Sonoma County Local Agency Formation Commission	Change of Organization Application	Change to Graton CSD boundary
County of Sonoma	Encroachment Permit	Improvements made within a County right-of-way along Green Valley Road
Caltrans District 4	Utility Encroachment Permit	Improvements made within a Caltrans right-of-way along Highway 116

1.7 Tribal Consultation

Graton CSD has not received requests for notification of proposed projects from California Native American tribes pursuant to Public Resources Code Section 21080.3.1. See Section 3.17, Tribal Cultural Resources, for additional information.

2. 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" as indicated by the checklist on the following pages. Where checked below, the topic with a potentially significant impact will be addressed in an environmental impact report:

- | | | |
|--|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agricultural & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities/Service Systems |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there would not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION would be prepared.
- ☐ I find that the proposed MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


LEAD AGENCY Signature

10/31/2019
Date

3. Environmental Analysis

3.1 Aesthetics

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				✓
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			✓	
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings?			✓	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		✓		

a) Have a substantial adverse effect on a scenic vista? (No Impact)

The Sonoma County General Plan does not explicitly identify scenic vistas (Sonoma County 2008). The proposed aboveground project improvements would be installed in the eastern portion of the property located at 4115 North Gravenstein Highway, which operates as the Bridgeway Gas Station. The majority of the proposed improvements, such as the proposed new sewer main, would be located below ground. The aboveground improvements that would be constructed as part of the project would be limited to an approximately 1,000-square-foot paved area with concrete curbs and a 6-foot-tall and 6-foot-wide aboveground control box. Such improvements would not be visible from a designated scenic vista, therefore, no impact would result.

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

Highway 116 (Gravenstein Highway) in the project vicinity is an officially designated State scenic highway. The *Sonoma 116 Scenic Highway Corridor Study* identifies several contributing elements to the scenic quality of Highway 116, including stands of trees, the Russian River and its associated vegetation, varied and undulating terrain, and small-scale man-made structures (Caltrans 1988).

Construction activities would result in temporary changes in the visual character of the immediate project area for approximately 3 months. Trenchless methods such as jack-and-bore would be used to install the proposed new sewer main beneath Highway 116. The jack-and-bore method entails excavating a sending pit and receiving pit at either end of the pipe segment. Such construction

activities would include the presence of construction equipment, trucks, staging and laydown areas, and associated fugitive dust adjacent to the Highway 116 corridor. However, given the temporary nature and short duration (3 months) of project construction activities, the impact of such activities would be less than significant.

Following construction, disturbed areas adjacent to Highway 116 would be repaved and the proposed sewer main would not be visible. The proposed aboveground utility infrastructure improvements that would be installed on the east side of the Bridgeway Gas Station property would include a new 16-foot wide concrete driveway, an aboveground control box housing electrical controls and plumbing connections measuring approximately six feet in height and six feet in width. Existing views of the eastern portion of the project site from Highway 116 includes gas station buildings and pump islands, an aboveground propane tank, overhead utility lines, and asphalted and concrete paved parking areas. The proposed improvements would be set back approximately 160 feet from Highway 116 and would not be out of character with the design and appearance of the existing Bridgeway Gas Station. No trees, rock outcroppings, or historic buildings would be removed or altered for the project. No placement of new signs or substantial site re-grading would occur. Therefore, existing views of the project site from Highway 116 would not substantially change. The impact would be less than significant.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (Less than Significant)

The property at 4115 North Gravenstein Highway is an active gasoline service station. The site is within a rural residential (RR 2) land use designation and a scenic resources combining district (LG/116 SR). Utilizing the Sonoma County Permit and Resource Management Department (PRMD) *Visual Assessment Guidelines*, the site sensitivity of the project site would be high, which is a category applied to sites with zoning designations protecting scenic resources. The proposed aboveground improvements would be located on a property that is used as a gasoline station and convenience store. The aboveground improvements that would be constructed as part of the project would be limited to an approximately 1,000 sf area with concrete curbs and a 6-foot-tall and 6-foot-wide aboveground control box. The improvements would be minimally visible from public views along Highway 116, and would not contrast with the existing developed gas station site in a manner that would attract attention. Utilizing the Sonoma County PRMD *Visual Assessment Guidelines*, the visual dominance of the project would be subordinate. Therefore, the project would have a less-than-significant impact on the visual character of the site and its surroundings.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Less than Significant with Mitigation)

Caltrans may require that the proposed trenchless Highway 116 undercrossing be completed during nighttime work periods. Lighting would be needed for completion of nighttime work. Based on the type and extent of trenchless work to be performed, construction could require up to 5 nighttime work periods. Although such lighting would be temporary, it may create a new source of light and glare on adjacent residences. The construction-related impact would therefore be potentially significant. Following construction, all project operations would occur during daylight hours. New lighting would not be installed at the proposed wastewater receiving station. No operational impact would result.

Mitigation

Implementation of Mitigation Measure AES-1 would reduce the potential impact of nighttime lighting to a less-than-significant level through implementation of measures to avoid glare that would be a hazard to vehicles and to avoid light trespass onto adjacent residential uses.

Mitigation Measure AES-1: Avoid Glare and Light Trespass from Nighttime Construction Lighting

The Graton CSD and its contractor shall prepare and implement a Nighttime Construction Lighting Plan for any nighttime construction work so as to avoid glare that would be a hazard to vehicles and to avoid light trespass onto adjacent residential uses. The lighting plan shall be developed to guide the use of lighting during project construction in such a way as to effectively light the work area while limiting light spill onto adjoining properties. This shall include the layout of lighting equipment necessary for all work to be completed at night and descriptions of hardware, including hoods, louvers, shields or other means to be used to control glare and light trespass onto adjoining property. Lighting systems with flood, spot, or stadium type luminaires shall be aimed downward at the work. The recommendations contained in the Nighttime Construction Lighting Plan shall be incorporated into the final plans and specifications for the project and implemented during construction.

3.2 Agricultural and Forestry Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?				✓
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✓
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?				✓

a-e) Convert farmland or forest land? (No Impact)

The project would not be located on lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide importance (CDC, 2018), or on land under a Williamson Act contract (County of Sonoma, 2018). The project would not be constructed on land zoned for agricultural or forestland uses. Thus, the project would not convert Important Farmland, land under a Williamson Act contract, or forest land to other uses, nor conflict with zoning for agricultural or forestry uses. No impact to agriculture or forestry resources would result.

3.3 Air Quality

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				✓
b) Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			✓	
c) Expose sensitive receptors to substantial pollutant concentrations?			✓	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✓	

a) Conflict with or obstruct implementation of the applicable air quality plan? (No Impact)

The project site and the majority of the proposed wastewater transportation route is located within the North Coast Air Basin and within the jurisdiction of the Northern Sonoma County Air Pollution Control District (NSCAPCD). The North Coast Air Basin is in attainment for all criteria air pollutants, and no applicable air quality plan exists for the project area (Personal Communication, NSCAPCD 2019).

An approximately 4-mile segment of the wastewater transportation route between the Occidental CSD Lift Station and the proposed Graton CSD receiving station would be within the San Francisco Bay Area Air Basin and within the jurisdiction of the Bay Area Air Quality Management District. Under California standards, the San Francisco Bay Area Air Basin is currently designated as a nonattainment area for particulate matter 2.5 microns or less in diameter (PM_{2.5}), particulate matter 10 microns or less in diameter (PM₁₀), and ozone. Under national standards, the San Francisco Bay Area Air Basin is currently designated as nonattainment for PM_{2.5} and 8-hour ozone. The Air Basin is in attainment (or unclassified) for all other air pollutants. (BAAQMD 2018)

The BAAQMD's 2017 Clean Air Plan (BAAQMD 2017a) is the applicable air quality plan for the San

Francisco Bay Area Air Basin. The 2017 Clean Air Plan contains 85 individual control measures in nine economic sectors: stationary (industrial) sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Many of these control measures require action on the part of the BAAQMD, the California Air Resources Board (CARB), or local communities, and are not directly related to the actions undertaken for an individual development project. The project would not prevent the BAAQMD from implementing these actions and none apply directly to the project. As a result, the project would not conflict with or obstruct implementation of the 2017 Clean Air Plan. No impact would result.

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

The project site and the majority of the proposed wastewater transportation route is located in an area that is in attainment for all criteria air pollutants. By its nature, air pollution is largely a cumulative impact, in that individual projects are rarely sufficient in size to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions may contribute to cumulative adverse air quality impacts.

Construction activities are anticipated to take approximately 3 months to complete. The types of air pollutants generated by construction activities are typically nitrogen oxides and particulate matter, such as dust and exhaust. Construction activities could temporarily increase levels of PM_{2.5} and PM₁₀ downwind of construction activity. These are temporary emissions that vary considerably from day-to-day and by the type of equipment and weather. In addition, CO and reactive organic gases are emitted during operation of gas and diesel-powered construction-equipment.

Construction-related air pollutant emissions were estimated for the project using the California Emissions Estimator Model (CalEEMod). The results were then compared to the NSCAPCD thresholds of significance for criteria pollutants. As shown in Table 3.2-1 (Construction Air Emissions Associated with Project), the estimated construction-related emissions are less than the thresholds of significance adopted by the NSCAPCD. Therefore, the impact from construction related emissions would be less than significant.

Table 3.2-1 Construction Air Emissions Associated with Project

Project Construction Emissions	CO (tons/yr)	NO _x / VOCs (tons/yr)	PM ₁₀ (tons/yr)	PM _{2.5} (tons/yr)
2020	0.46	0.45	0.06	0.02
<i>NSCAPCD Thresholds</i>	<i>100</i>	<i>40</i>	<i>15</i>	<i>10</i>

Following construction, the project would not result in new stationary sources of criteria air pollutants. Trucks transporting wastewater from the Occidental CSD to the proposed Graton CSD receiving station would travel approximately 7 vehicle miles for a one-way trip. Under existing conditions, trucks transporting wastewater from the Occidental CSD to the ALWSZ WWTF travel approximately 18 vehicle miles for a one-way trip. Reducing haul trip lengths from 18 miles to 7 miles would reduce mobile source air emissions by more than 50 percent, resulting in a beneficial air quality effect. No operational impact would result.

c) Expose sensitive receptors to substantial pollutant concentrations? (Less than Significant)

Sensitive receptors are members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. No schools, hospitals, child care centers, or other similar facilities are located near the project site. The nearest schools, Oak Grove Elementary and Acorn Preschool, are located approximately 0.9 mile to the south of the project site. The nearest sensitive receptors to the project site are residential land uses at the adjacent Blue Spruce Lodge mobile home community to the east and northeast of the project site, as well as the single-family residences to the north of the project site. Construction would also occur along Green Valley Road related to installing approximately 300 feet of sewer force main, which is bordered to the north and south by single-family residences.

As required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]), construction contractors would be required to minimize idling times for trucks and equipment to five minutes, as well as ensuring that construction equipment is maintained in accordance with manufacturer's specifications. Given the short construction period (3 months) and continuous shifting of the construction activities, prolonged exposure of sensitive receptors to substantial pollutant concentrations would not occur. Therefore, the impact of construction-related emissions on sensitive receptors would be less than significant.

Following construction, the project would not result in a new stationary source of criteria air pollutants. The project would reduce mobile source air emissions by more than 50 percent compared to baseline emissions, resulting in a beneficial air quality effect. The project would require periodic idling of transport vehicles at the proposed receiving station site, which is located approximately 75 feet from the nearest receptor. However, idling of vehicles during the wastewater transfer process would be non-continuous, occurring in approximately 5-minute increments 3 to 5 days per week. The operational impact on sensitive receptors to substantial pollutant concentrations would be less than significant.

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

The transfer of wastewater from trucks to the Graton CSD collection system would occur through a closed system. Trucks would pull into the proposed driveway and connect to the proposed receiving station control valves. The closed system would prevent odors from emanating from the transfer process and the collection system. The receiving station would include concrete curbing, drainage, and a potable water connection to ensure that any accidental spills would be discharged to the wastewater collection system. Therefore, the impact related to odor emissions would be less than significant.

3.4 Biological Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?			✓	
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?				✓
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?				✓
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?				✓
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
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?				✓

- 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 Game or U.S. Fish and Wildlife Service? (Less than Significant)**

An evaluation of the existing biological setting on and near the project site was conducted to determine the potential for any special-status plants or animal species to occur. A reconnaissance-level site visit was also conducted by a qualified biologist on August 7, 2019 to evaluate on-site and

adjacent habitat types. Information on special-status species was compiled through a review of the literature and database searches. The following sources were reviewed to determine which special-status plant and wildlife species have been documented in the vicinity of the project site:

- California Department of Fish and Wildlife Natural Diversity Database (CNDDB)
- California Native Plant Society (CNPS) Rare and Endangered Plant Inventory
- United States Fish and Wildlife (USFWS) Information for Planning and Conservation (IPaC)

The project would include improvements to an approximately 1,000 sf portion of the existing Bridgeway Gas Station property at 4155 North Gravenstein Highway, and a new sewer main within an existing asphalted section of Green Valley Road. The project site is comprised of existing hardscapes, landscaped areas, and roadways. Based on the existing conditions at the project site and on the site reconnaissance, no suitable habitat for special-status plants is present, therefore, no special-status plants are expected to occur. No impact to special-status plant species would result.

No occurrences of special-status wildlife species have been recorded on the project site, and none were identified during a site reconnaissance. The project site lacks vegetation for passerine, raptor, and bat habitat. The project site is mapped as a noise impacted segment in Sonoma County (Sonoma County 2012), and estimated construction noise levels in the project area would be temporary and moderate and not expected to effect potential nesting in off-site trees. Existing trees and roadside areas would not be altered by project construction or operations. There are no vernal pools, wetlands, creeks, rivers, riparian zones, ponds, lakes, marshes, or other open water bodies on or adjacent to the project site, nor any grasslands, woodlands, or open forests. Because of the lack of suitable habitat and the location of the project in a developed environment, no special-status wildlife species are expected to occur within the project area. The impact would be less than significant.

b,c) 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 Game or US Fish and Wildlife Service, including wetlands? (No Impact)

The project site is comprised of existing hardscapes, landscaped areas, and roadways. The project site does not include riparian habitat or other sensitive natural communities, such as grasslands or wetlands (including marsh or vernal pools). No impact would result.

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? (No Impact)

The project site does not include waterways or other sensitive natural communities that provide wildlife movement corridors. The project site and general vicinity does not provide high quality wildlife habitat and is limited to rural residential neighborhoods and wineries. Above-ground physical changes to the project area would be minimal and limited to the proposed wastewater receiving station on the existing gas station property. Given the location of the project and its small footprint, the project would not interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or nursery sites. No impact would result.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (No Impact)

The *Sonoma County General Plan 2020* includes goals to protect and enhance the County's natural habitats and diverse plant and animal communities (Goal OSRC-7), and to protect and enhance riparian corridors and functions (Goal OSRC-8). The project site is not located within a resource protection zone as defined by the Sonoma County General Plan, or an area designated as a protected area by the Riparian Corridor Ordinance. Additionally, the project would not remove trees that are protected by the Tree Protection Ordinance listed in the Sonoma County Code (Chapter 26, Article 88 Sec. 26-08-010). Therefore, the project would not conflict with local policies or ordinances. No impact would result.

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? (No Impact)

The project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As such, the project would not conflict with the provisions of an adopted habitat conservation plan. No impact would result.

3.5 Cultural Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?				✓
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		✓		
c) Disturb any human remains, including those interred outside of formal cemeteries?		✓		

An *Archaeological Resources Study* was prepared for the project by the Sonoma State University Anthropological Studies Center (ASC 2019). The study assessed the potential for surficial and/or buried archaeological resources in the proposed improvement area through the completion of the following:

- Records and literature search at the Northwest Information Center (NWIC) of the California Historical Resources Information Center (CHRIS);
- Further literature review of publications, files, and maps for ethnographic, historic-era, and prehistoric resources and background information;
- Communication with the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File and contact information for the appropriate tribal communities;
- Contact with the appropriate local Native American Tribes; and
- Pedestrian archaeological survey of the project area.

Study results were used as a technical basis for evaluating potential impacts to historic and cultural resources under CEQA.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (No Impact)

The project would include improvements to an approximately 1,000 sf portion of the existing Bridgeway Gas Station property at 4155 North Gravenstein Highway, and a new sewer main within an existing asphalted section of Green Valley Road. There are no listed historical resources, including historic properties, present within the project area (ASC 2019), and the existing Bridgeway Gas Station property would not meet any of the context types required for establishment of historic significance. No impact would result.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (Less than Significant with Mitigation)

The *Archaeological Resources Study* conducted for the project found no previously recorded cultural resources located within the proposed improvement area. A pedestrian archaeological survey of the project site also identified no archaeological resources. Two cultural resources studies have

previously been conducted over the majority of the project area, and no cultural resources were recorded within one-quarter mile. The study concluded that the sensitivity of the project area for buried archaeological resources is low (ASC 2019). Although no known archaeological resources were identified within the project area, the potential exists for encountering previously undiscovered archaeological resources during project construction. Therefore, the impact is considered potentially significant.

Mitigation

Implementation of Mitigation Measure CR-1 would reduce the potential impact to previously undiscovered archaeological resources by outlining procedures to be taken in the event of inadvertent discovery.

Mitigation Measure CR-1: Minimize Impacts to Unknown Archaeological Resources

In the event that any subsurface archaeological features or deposits, including locally darkened midden soil, are discovered during construction-related earth-moving activities, all ground-disturbing activity in the vicinity of the resource shall be halted, a qualified professional archaeologist shall be retained to evaluate the find, and the appropriate tribal representative(s) shall be notified. If the find qualifies as a historical resource or unique archaeological resource as defined by CEQA, the archaeologist shall develop appropriate measures to protect the integrity of the resource and ensure that no additional resources are affected. In considering any suggested measures proposed by the consulting archaeologist in order to mitigate impacts to historical resources or unique archaeological resources, the Graton CSD shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project while mitigation for unique archaeological resources is being carried out.

c) Disturb any human remains, including those interred outside of formal cemeteries? (Less than Significant with Mitigation)

No human remains are known to exist within the project area. However, there is potential for earthwork and grading to result in the disturbance of previously unrecorded human remains, if present. Therefore, the impact is considered potentially significant.

Mitigation

Implementation of Mitigation Measure CR-2 would reduce the potential impact by outlining procedures to be taken in the event of inadvertent discovery of human remains.

Mitigation Measure CR-2: Protect Human Remains if Encountered

If human remains, associated grave goods, or items of cultural patrimony are encountered during construction, work shall halt in the vicinity of the find and the County Coroner shall be notified immediately. The following procedures shall be followed as required by Public Resources Code § 5097.9 and Health and Safety Code § 7050.5. If the human remains are determined to be of Native American origin, the Coroner shall notify the Native American Heritage Commission within 24 hours of the determination. The Native American Heritage Commission shall then notify the Most Likely Descendant (MLD), who has 48 hours to make recommendations to the landowner for the disposition of the remains. A

qualified archaeologist, the Graton CSD and the MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of any human remains and associated or unassociated funerary objects. The agreement would take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, and final disposition of the human remains and associated or unassociated funerary objects.

3.6 Energy

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			✓	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				✓

a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Less than Significant)

Construction of the project would involve grading, excavation and use of heavy machinery as discussed under Section 3.3 (Air Quality). Construction would require the use of fuels, primarily gas, diesel, and motor oil. The precise amount of construction-related energy consumption that would occur is uncertain. However, construction would not require a large amount of fuel or energy usage because of the moderate number of construction vehicles and equipment, worker trips, and truck trips that would be required for a project of this scale. Construction equipment would remain staged in the project area once mobilized. Use of fuels would not be wasteful or unnecessary because their use is necessary to complete the project. Excessive idling and other inefficient site operations would be prohibited. Equipment idling times would be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes or less (as required by the California airborne toxics control measure (Title 13, Section 2485 of the CCR). Therefore, construction would not result in the use of large amounts of fuel and energy in a wasteful manner, and the impact would be less than significant.

Following construction, trucks transporting wastewater from the Occidental CSD to the proposed Graton CSD receiving station would travel approximately 7 vehicle miles for a one-way trip. Under existing conditions, trucks transporting wastewater from the Occidental CSD to the ALWSZ WWTF travel approximately 18 vehicle miles for a one-way trip. Reducing haul trip lengths from 18 miles to 7 miles would result in substantial long-term operational energy savings. The energy required to treat Occidental's wastewater at the Graton CSD WWTP would be offset by the reduction in energy at the ALWSZ WWTP. Therefore, the project would result in a net reduction in energy consumption. No operational impact would result.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (No Impact)

In 2003, the California Energy Commission (CEC), the California Power Authority (CPA), and the California Public Utilities Commission (CPUC) jointly adopted an Energy Action Plan (EAP) that listed goals for California's energy future and set forth a commitment to achieve these goals through specific actions (CEC 2003). In 2005, the CPUC and the CEC jointly prepared the EAP II to identify the further

actions necessary to meet California's future energy needs. Additionally, the CEC prepared the State Alternative Fuels Plan in partnership with the California Air Resources Board and in consultation with the other state, federal, and local agencies. The alternative fuels plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production (CEC 2007).

Locally, the *Sonoma County 2020 General Plan* includes goals to promote energy conservation in the County (Goal OSRC-14) and to increase use of renewable energy resources (OSRC-15).

Construction and operation of the project would not conflict with or obstruct implementation of either the EAP, EAP II, the State Alternative Fuels Plan or local County general plan goals. Project construction would not require a large amount of fuel or energy usage because of the limited extent and nature of the proposed improvements and the minimal number of construction vehicles and equipment, worker trips, and truck trips that would be required for a project of this small scale. Project operation would result in a net reduction in energy consumption by substantially reducing existing vehicle miles travelled for wastewater transportation. No conflicts with a state or local plan for renewable energy or energy efficiency have been identified. Therefore, no impact would result.

3.7 Geology and Soils

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?				✓
ii) Strong seismic ground shaking?			✓	
iii) Seismic-related ground failure, including liquefaction?			✓	
iv) Landslides?				✓
b) Result in substantial soil erosion or the loss of topsoil?			✓	
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?			✓	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			✓	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✓
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		

a, 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. (No Impact)

The project site is not located within a designated Alquist-Priolo Earthquake Fault Zone or near a known active fault. The nearest active fault is the Rodgers Creek Fault located approximately eight miles west of the site (ABAG 2019). The project would not change the exposure of people of structures to risk of loss, injury, or death from fault rupture. Thus, no impact would result.

a, ii) Strong seismic ground shaking? (Less than Significant)

The project site is expected to experience strong seismic groundshaking over the life of the project, with strong shaking (Modified Mercalli Intensity 7) predicted at the site if a large earthquake occurs along the Berryessa, Maacama, or Rodgers Creek Faults, or the northern segments of the San Andreas Fault (ABAG 2019). The proposed project would not alter the seismic environment or affect the risk of seismically-induced groundshaking. Therefore, there would be no change regarding the exposure of people or structures to substantial adverse effects related to the risk of property loss, injury, or death due to seismically-induced groundshaking compared to existing conditions. If strong seismic groundshaking were to damage the proposed facilities, it is unlikely that human lives would be put at risk because the project does not involve the construction of habitable structures. The project would be constructed to the seismic standards of the most recent California Building Code, as applicable. Therefore, the impact to people and structures from strong seismic groundshaking would be less than significant.

a.iii) Seismic related ground failure, including liquefaction? (Less than Significant)

The project site and surrounding properties are located in an area mapped as having Very Low Susceptibility to liquefaction (Permit Sonoma GIS 2019). The project would not alter the seismic environment or affect the risk of seismically-induced ground failure, including liquefaction. There would be no change regarding the exposure of people or structures related to the risk of property loss, injury, or death due to seismically-induced ground failure compared to existing conditions. Therefore, the impact related to seismic-related liquefaction would be less than significant.

a.iv) Landslides? (No Impact)

The proposed improvements would be located on relatively level, previously developed and/or paved land. The project site and surrounding properties are located in an area mapped as having few landslides (Permit Sonoma 2019). The project site is not located within a deep-seated landslide hazard area (Sonoma County 2008), or on a mapped landslide complex or debris flow source area (USGS 1997; USGS 1998). No impact would result.

b) Result in substantial soil erosion or the loss of topsoil? (Less than Significant)

Areas to be disturbed during construction would consist predominantly of hardscapes and underlying soils that have been highly altered from their original, natural state. As a result, the project would result in little disturbance to native soils.

The project includes grading, cuts, and fills that have the potential to cause erosion. Erosion and sediment control provisions of the County Construction Grading and Drainage Ordinance (Municipal Code Chapter 11) and Storm Water Quality Ordinance (Municipal Code Chapter 11A) require submission of an Erosion and Sediment Control Plan and implementation of best management practices to reduce erosion. These mandatory ordinance requirements and adopted best management practices are designed to maintain potential water quantity impacts at a less than significant level during and post construction. Therefore, the potential soil erosion impact would be less than significant.

c, d) Be located on a geologic unit or soil that is unstable or expansive? (Less than Significant)

Based on results of a geotechnical field exploration (GHD 2019), subsurface materials at the site and within Green Valley Road generally consist of very loose to medium dense silty sand. The project

would include the use of on-site soils or imported material that meets engineered fill specifications. The project would not otherwise alter the properties of the soils at the project site nor cause or worsen the risks associated with unstable or expansive soils. There would be no change regarding substantial risks to life or property due to expansive or corrosive soils compared to existing conditions. The impact would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (No Impact)

The project would eliminate the use of an existing septic tank system at 4115 North Gravenstein Highway. No new septic tanks or alternative wastewater disposal systems requiring infiltration to soils would be constructed. No impact would result.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Less than Significant with Mitigation)

The proposed improvements would not require modification of any unique geologic features. Excavation and earthmoving activities would primarily occur within highly disturbed areas that are underlain by engineered soils and/or fill. Geologic materials underlying the project area are mapped as Miocene to Pleistocene aged marine rocks. Because project excavations would primarily occur in previously disturbed sites and soils, the sensitivity of the project area for buried paleontological resources is considered to be low. However, older alluvium has yielded vertebrate fossils in Sonoma County and throughout California. Therefore, although it is unlikely that project construction would impact paleontological resources, the potential exists for encountering previously undiscovered resources during project construction. The impact is considered potentially significant.

Mitigation

Mitigation Measure GEO-1 would reduce the impact of construction activities on unknown paleontological resources to a less-than-significant level by addressing discovery of any unanticipated buried resources and preserving and/or recording those resources consistent with appropriate laws and requirements.

Mitigation Measure GEO-1: Protect Paleontological Resources during Construction

In the event that fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities shall be diverted away from the discovery within 50 feet of the find, and a professional paleontologist shall be notified to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the material, if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they will be properly curated and preserved.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				✓

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Less than Significant)

No applicable standard or significance threshold has been established pertaining to construction-related greenhouse gas emissions. Therefore, this review uses a qualitative approach to construction emissions in accordance with Section 15064.4(a)(2) of the CEQA Guidelines. Project construction activities would result in a temporary increase in GHG emissions, including exhaust emissions from on-road trucks, worker commute vehicles, and off-road heavy-duty machinery. Construction would require clearing, earthmoving, and delivery equipment, as used for similar projects, and which have been accounted for in the State's emission inventory and reduction strategy for both on and off-road vehicles. Project construction activities are limited in scope and duration (3 months), and would not involve construction activities associated with higher-level greenhouse gas emissions such as use of a significant amount of heavy construction equipment, substantial earth-moving activities, or import/export of a substantial amount of material. Project construction activities would not impede the State in meeting the AB 32 greenhouse gas reduction goals. Therefore, impacts from the project's construction emissions would be less than significant.

Following construction, trucks transporting wastewater from the Occidental CSD to the proposed Graton CSD receiving station would travel approximately 7 vehicle miles for a one-way trip. Under existing conditions, trucks transporting wastewater from the Occidental CSD to the ALWSZ WWTF travel approximately 18 vehicle miles for a one-way trip. Therefore, the project would reduce haul one-way trip lengths from 18 miles to 7 miles, which would reduce long-term operational greenhouse gas emissions. The increased energy required to treat Occidental's wastewater at the Graton CSD WWTP would be offset by a reduction in energy at the ALWSZ WWTP. Therefore, the project would result in a net reduction in energy consumption and greenhouse gas emissions. No operational impact would result.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (No Impact)

This analysis uses the California Air Resources Board (CARB) *2017 Climate Change Scoping Plan* as the applicable greenhouse gas reduction strategy (CARB 2017). The Sonoma County Regional Climate Protection Authority's Climate Action Plan is not used as a qualified greenhouse gas reduction strategy for CEQA purposes due to a court settlement.

The 2017 Climate Change Scoping Plan provides strategies for meeting the mid-term 2030 greenhouse gas reduction target set by Senate Bill (SB) 32. The 2017 Climate Change Scoping Plan also identifies how the State can substantially advance toward the 2050 greenhouse gas reduction target of Executive Order S-3-05, which consists of reducing greenhouse gas emissions to 80 percent below 1990 levels. The recommendations cover several key sectors, including: energy and industry; transportation; natural and working lands; waste management; and water. The recommended measures in the 2017 Scoping Plan are broad policy and regulatory initiatives that will be implemented at the State level and do not relate to the construction and operation of individual projects. The project would not impede the State developing or implementing the greenhouse gas reduction measures identified in the Scoping Plan. Therefore, the project would not conflict with AB 32 or the 2017 Climate Change Scoping Plan. No impact would result.

The County's Climate Change Action Resolution (May 8, 2018) resolved to reduce GHG emissions by 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050 and noted twenty strategies for reducing GHG emissions, including increasing carbon sequestration, increasing renewable energy use, and reducing emissions from the consumption of good and services. Project operation would result in a net reduction in energy consumption by substantially reducing existing vehicle miles travelled for wastewater transportation. The project would not conflict with the County's Climate Change Action Resolution. No impact would result.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
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?			✓	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
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?		✓		
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?				✓
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✓
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			✓	

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

Small amounts of common hazardous materials such as fuel, solvents, and lubricants would be used during construction of the project. During construction activities, any on-site hazardous materials that may be used, stored, or transported would be required to follow standard protocols (as determined by the U.S. EPA, California Department of Health and Safety, and Sonoma County) for maintaining health and safety. Caltrans and the California Highway Patrol regulate the transportation of hazardous materials and wastes, including container types and packaging requirements, as well as licensing and training for truck operators, chemical handlers, and hazardous waste haulers. The California Division of Occupational Safety and Health (Cal-OSHA) also enforces hazard communication program regulations which contain worker safety training and hazard information requirements, such as procedures for identifying and labeling hazardous substances, communicating hazard information related to hazardous substances and their handling, and preparation of health and safety plans to protect workers and employees. Because the Graton CSD and its contractors would be required to comply with existing and future hazardous materials laws and regulations and applicable best management practices addressing the transport, storage, use, and disposal of hazardous materials, the potential to create a significant hazard to the public or the environment during construction of the project would be less than significant.

Following construction, operation of the project would include ongoing and regulator transport of wastewater, which would require fuel. Fueling and other haul truck vehicle maintenance that may require use of common hazardous materials (e.g. lubricants or oil) would not occur on site. The operational impact would be 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? (No Impact)**

Oak Grove Elementary and Acorn Preschool are the nearest schools to the proposed construction area, located approximately 0.9 mile to the south. The schools are also located approximately one-quarter mile south of Graton Road, which is currently utilized as the wastewater transportation route for transport of wastewater from Occidental CSD to the ALWSZ WWTP. The project would not result in a change in the number of transport trucks that would travel along Graton Road north of the schools. No impact would result.

- 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? (Less than Significant with Mitigation)**

The provisions in Government Code Section 65962.5 are commonly referred to as the "Cortese List." A search of the Cortese List search (CalEPA 2019) was completed to determine if any known hazardous waste sites have been recorded on or adjacent to the project construction area.

The site at 4115 North Gravenstein Highway is the current location of the Bridgeway Gas Station and is included on a list of active leaking underground storage tank (LUST) sites (Site No. T0609700188). The cleanup status is listed as open-remediation, with the potential contaminant of concern identified

as gasoline. A review of the electronic submittals available on the State Geotracker database indicates that several underground storage tanks have been previously removed from the site in 1991 and 1998 (CalEPA 2019). Since 1993, monitoring and remediation wells have been installed and regularly monitored at the site. Remediation activities have included soil vapor extraction and ozone injection.

According to the *Fourth Quarter 2018 and First Quarter 2019 Groundwater Monitoring and Remediation Status Update Report* (Stratus 2019), depth to groundwater at the site ranged from 17.20 to 20.77 feet bgs in shallow screened wells and 19.26 to 22.59 feet bgs in deep screened wells. During a geotechnical instigation completed in June 2019, groundwater was encountered at approximately 14.5 feet bgs at the project site. The groundwater flow direction was identified as northwest, north, northeast for the shallow screened wells, and northeast for the deep screened wells. Historical monitoring reports also indicate that groundwater flow directions at the project site range to the west and southwest.

The project would include improvements to an approximately 1,000 sf portion of the existing property at 4155 North Gravenstein Highway, and a new sewer main within an existing asphalted section of Green Valley Road. The deepest excavations anticipated for construction would be approximately 5 to 7 feet. Given the relatively shallow depth of excavation and the deeper underlying groundwater table, project construction activities are not anticipated to encounter groundwater. Therefore, trenching and installation of the proposed new sewer main would not result in a change in the groundwater flow pathways or the spread of contaminated groundwater.

In July 2019, discrete soil samples were collected at depths of 5-feet and 13.5-feet bgs from the eastern portion of the property where excavation would occur. Composite soil samples were also collected from four borings located within Green Valley Road where excavation would occur. Laboratory results indicated that the tested soil was below the reportable detection limits for total petroleum hydrocarbons (TPH) as gasoline, benzene, toluene, ethylbenzene, and xylenes (AAL 2019). Based on the results of the soil samples, construction activities including utility trenching is not anticipated to encounter residual concentrations of hydrocarbons or other hazardous wastes in the soil. However, because the project site is undergoing active monitoring and remediation, in the event that conditions change prior to construction and utility trenching excavations encounter low level residual concentrations of hydrocarbons in the soil, the impact is conservatively considered potentially significant.

Mitigation

Implementation of Mitigation Measure HAZ-1 would reduce the potential for a hazardous waste-related impacts to a less-than-significant level by requiring the proper handling and disposal of hazardous wastes per applicable local, state and federal regulations and/or guidelines.

Mitigation Measure HAZ-1: Handling and Disposal of Contaminated Soil

Graton CSD and its contractor shall prepare and implement a Soil Management Plan for project-related excavation activities. Elements of the Soil Management Plan shall include, but would not necessarily be limited to, the following:

- Measures to address hazardous materials and other worker health and safety issues during construction, including the specific level of protection required for construction workers. This may include preparation of a site-specific health and safety plan in accordance with federal OSHA and Cal-OSHA regulations to address worker health and safety issues during construction.

- Monitoring of excavation activities, including visual and organic vapor monitoring by personnel with appropriate hazardous materials training, including 40 hours of HAZWOPER training. If visual and organic vapor monitoring indicates signs of suspected contaminated soil, then soil samples shall be collected and analyzed to characterize soil quality for gasoline and associated constituents.
- Provisions for excavation, stockpiling, and disposal of any contaminated soil. This shall include the separation of contaminated soils from non-contaminated soils, and procedures to ensure that contaminated soils are stored, managed, and disposed of in a manner that is protective of human health and in accordance with applicable laws and regulations.

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? (No Impact)

The project site is not located within an Airport Referral Area as designated by the Sonoma County Comprehensive Airport Land Use Plan or within two miles of a public use airport. No impact would result.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (No Impact)

The project would not impair or physically interfere with implementation of Sonoma County's adopted emergency operations plan. The project would not change existing circulation patterns, would not generate new traffic, and would not effect emergency response routes. No impact would result.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Less than Significant)

The project site is not located within a Fire Hazard Severity Zone (Sonoma County 2014 & 2017, Cal Fire 2008), but is located in an area mapped as a fire-threatened community for wildland fires (ABAG 2019). The project site is comprised of existing hardscapes, landscaped areas, and roadways, and the potential for construction activities to result in fires would be low. The project would not otherwise increase exposure to wildland fire above existing conditions. The impact would be less than significant.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				✓
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?				✓
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				✓
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?				✓
iv) Impede or redirect flood flows?				✓
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✓

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? (Less than Significant)

Areas to be disturbed during construction would consist predominantly of hardscapes and underlying soils that have been highly altered from their original, natural state. The project site does not include waterways. However, the project would include grading, cuts, and fills that have the potential to cause erosion. Project construction activities could also be a source of chemical contamination from use of alkaline construction materials (e.g., concrete) and hazardous or toxic materials (e.g., fuels, solvents, asphalt, and paints).

Erosion and sediment control provisions of the County Construction Grading and Drainage Ordinance (Municipal Code Chapter 11) and Storm Water Quality Ordinance (Municipal Code Chapter 11A) require submission of an Erosion and Sediment Control Plan and implementation of best management practices to reduce erosion. These mandatory ordinance requirements and adopted best management practices are designed to maintain potential water quantity impacts at a less than significant level during and post construction. Therefore, the potential impact would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (No Impact)

The proposed project improvements would be located in the Wilson Grove Formation Highlands groundwater basin (1-059). The 2019 priority ranking for this groundwater basin was low and the basin is not critically over drafted (DWR 2019). Project excavations would be shallower than the underlying groundwater table, however, if excavations encounter shallow groundwater, temporary dewatering would be required to provide a dry work area. Such temporary dewatering would have, at most, a very small effect on localized water levels in the immediate vicinity of the excavation, and no substantial deficit in aquifer volume or lowering of water levels would occur. Following construction, the project would include a connection to an existing water line that is connected to a domestic well on the project site to provide wash water in the event of an accidental spill. The project would not require a substantial increase in groundwater use. No impact would result.

c, i-iv) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site? (No Impact)

The project site is not located within a 100-year flood zone (FEMA 2008). Project improvements would be located within existing hardscapes, and areas disturbed during construction would be restored to pre-construction conditions. The project would not result in a substantial increase in new impervious surfaces, and would not result in a change to drainage patterns. The project would not alter the course of a stream or river, would not increase surface runoff, or create substantial additional sources of polluted runoff. The receiving station would include concrete curbing and drainage to contain potential spills and would direct all spills and runoff into the wastewater collection system. No impact to drainage would result.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (No Impact)

The project site is not located within a 100-year flood zone (FEMA 2008), a tsunami inundation area (Cal EMA 2009), or near a large body of water that may be affected by a seiche. No impact would result.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (No Impact)

The North Coast Regional Water Quality Control Board Basin Plan establishes thresholds for key water resource protection objectives for both surface waters and groundwater. The project is not located near a stream or river and would not alter water quality parameters established in the Basin Plan. Erosion control BMPs would be required to be implemented during construction to prevent

erosion and to protect overall water quality. The project is located within a low priority groundwater basin (No. 1-059), and the project would not utilize groundwater beyond minimal construction dewatering (if required) and use of an existing groundwater well for wash water in the event of an accidental spill. No conflicts with an existing or foreseeable sustainable groundwater management plan have been identified. No impact would result.

3.11 Land Use and Planning

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				✓
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?				✓

a) Physically divide an established community? (No Impact)

The project would include improvements to an approximately 1,000 sf portion of the existing Bridgeway Gas Station property at 4155 North Gravenstein Highway and a new sewer main within an existing asphalted section of Green Valley Road. The project does not include new features that would divide an established community. No impact would result.

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? (No Impact)

The property at 4115 North Gravenstein Highway is an active gasoline service station. The site has a rural residential (RR 2) land use designation and an agriculture and residential zoning (AR B6 2) with a scenic resources combining district (LG/116 SR). Specific Sonoma County General Plan policies adopted for the purpose of avoiding environmental effects are evaluated in this document under the corresponding issue areas; for example, policies related to noise are evaluated in Section 3.13, Noise. No conflicts with land use plans, policies, or regulations have been identified and no exceptions or reductions to standards would be necessary to approve the project. Therefore, the project would not conflict with any applicable requirements adopted for the purpose of avoiding or mitigating an environmental effect. No impact would result.

3.12 Mineral Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
f) 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?				✓
g) 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?				✓

- a, b) 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, or a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (No Impact)**

The project site is not located within a designated mineral resource deposit area (Sonoma County 2010), or within an area classified as MRZ-2 in the California Geologic Survey Special Report 205 (CGS 2013). No locally-important mineral resources are known to occur at the site. No impact would result.

3.13 Noise

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Result in 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?		✓		
b) Result in generation of excessive groundborne vibration or noise levels?			✓	
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?				✓

- a) Result in 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? (Less than Significant with Mitigation)**

The Sonoma County General Plan includes policies to avoid noise sensitive land uses in noise impacted areas (Policy NE-1b), to control non-transportation related noise from new projects (Policy NE-1c), and to require projects to include noise mitigation measures to maintain levels compatible with activities planned for a project site and vicinity (Policy NE-1f). Sonoma County's General Plan and municipal code do not establish construction-related noise standards. Therefore, construction activities would not generate noise levels in excess of applicable standards. However, Caltrans may require that the proposed trenchless Highway 116 undercrossing be completed during nighttime work periods, and based on the type and extent of trenchless work to be performed, construction could require work for approximately five nighttime periods. While nighttime construction would be temporary, it would create an increase in nighttime ambient noise levels on adjacent residences, and is therefore considered a potentially significant impact.

Following construction, the project would not result in the siting of a new noise sensitive land use and would not result in new non-transportation related noise. Therefore, noise standards established in General Plan Policy NE-1b and NE-1c would not be applicable to the project. Noise that would occur

as part of project operation would be transportation related. Neither the County of Sonoma or the State of California define the traffic noise level increase that is considered substantial. A standard industry threshold used for project generated traffic is whether traffic were to result in a permanent noise level increase of 3 dBA Ldn or greater in a residential area where the resulting noise environment would exceed or continue to exceed 60 dBA Ldn. Ldn is defined as the average A-weighted noise level during a 24-hour day, obtained after addition of 10 decibels to levels measured in the night between 10:00 pm and 7:00 am. Highway 116 in the project area is mapped as a noise impacted segment in Sonoma County (Sonoma County 2012), which extends to residential areas east of the project site off of Green Valley Road. Therefore, the above threshold of a permanent noise level increase of 3 dBA Ldn or greater is utilized for the evaluation of transportation related noise increases for the project.

The project would not result in an increase in vehicle trips along Graton Road and Highway 116 as wastewater is currently transported along the same route as proposed by the project. The change that would occur is that transport trucks would turn east onto Green Valley Road and pull into the proposed new driveway on the east side of the Bridgeway Gas Station site, and then connect to the proposed new receiving station control valves for transfer of wastewater Graton CSD collection system. Each delivery would take approximately 10 to 15 minutes on-site, and would include approximately 5 minutes of truck idling for pressurized pumping. When exiting the site, a back-up beeper would sound during reverse motions of a transport truck for safety purposes.

The transport of wastewater from the Occidental CSD to the proposed new Graton CSD receiving station would be scheduled to occur on a weekday (Monday through Friday) between 7 a.m. and 5 p.m. Transport of wastewater to the proposed Graton CSD receiving station would not be scheduled on weekends or after 5 p.m. on a weekday. It is anticipated that transport to the proposed Graton CSD receiving station would occur approximately 3 to 5 days per week. On a day when wastewater transport occurs, approximately 5 to 10 trips would occur over the course of the day. Given that transportation trips would be isolated to daytime periods and would occur at different short-term (10 to 15 minute) periods of the day, the daily average noise level increases would be less than 1 dBA Ldn. Therefore, the impact of transportation related noise would be less than significant.

Mitigation

With implementation of Mitigation Measure NO-1, construction noise levels associated with potential nighttime construction would be reduced to a less-than-significant level.

Mitigation Measure NOI-1: Reduce Nighttime Construction Noise Levels

If nighttime construction is required for the project, Graton CSD and its contractor shall implement best management practices to reduce construction noise levels emanating from construction activities and minimize disruption and annoyance at existing noise-sensitive receptors in the project vicinity. Specific measures that can be feasibly implemented to include, but are not limited to, the following:

- Provide advance notice to nearby residents within 250 feet prior to starting night time work, with information regarding anticipated schedule, hours of operation and a project contact person.
- A designated project liaison shall be responsible for responding to and resolving noise complaints.

- Best available noise control practices (including mufflers, intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds) shall be used for equipment and trucks in order to minimize construction noise impacts.
- Stationary noise sources shall be located as far from sensitive noise receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used. Enclosure openings or venting shall face away from sensitive noise receptors.
- Schedule work and deliveries to minimize noise-generating activities during night time hours at work sites (e.g., no deliveries or non-essential work).
- To the extent consistent with applicable regulations and safety considerations, operation of vehicles requiring use of back-up beepers shall be avoided near sensitive receptors during night time hours and/or, the work sites shall be arranged in a way that avoids the need for any reverse motions of large trucks or the sounding of any reverse motion alarms during night time work. If these measures are not feasible, trucks operating during the night time hours with reverse motion alarms shall be outfitted with SAE J994 Class D alarms (ambient-adjusting, or “smart alarms” that automatically adjust the alarm to 5 dBA above the ambient near the operating equipment).

b) Result in generation of excessive groundborne vibration or noise levels? (Less than Significant)

Caltrans recommends a vibration limit of 0.5 inches/second, peak particle velocity (in/sec PPV) for buildings structurally sound and designed to modern engineering standards, 0.3 in/sec PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a conservative limit of 0.08 in/sec PPV for ancient buildings or buildings that are documented to be structurally weakened (Caltrans 2004). The proposed construction areas would not be located in the vicinity of fragile structures. Therefore, based on Caltrans guidance, this analysis establishes 0.3 in/sec PPV as the significance threshold for construction vibration to avoid damage to buildings from vibration sources.

The construction equipment that would generate the highest vibration levels include pile drivers and jack hammers. Pile driving may be necessary to install shoring at the tunneling locations, which would require one to two days of use. The nearest structures to the construction area include the Bridgeway Gas Station pump islands, restroom building, and convenience store, which range from 60 to 90 feet from the sending pit where the highest levels of construction groundborne vibration would occur. The nearest residence to the sending pit on the east side of Highway 116 is located approximately 150 feet to the northeast. On the west side of Highway 116, the nearest buildings to the receiving pit are approximately 110 feet to the north and approximately 90 and 190 feet to the south. At these distances, the vibration levels produced by the proposed construction equipment would be below the 0.3 in/sec PPV threshold (FTA 2006). Therefore, the construction-related impacts to groundborne vibration would be less than significant.

Following construction, the project would not result in exposure of persons to or generation of excessive groundborne vibration levels. No operational impact would result.

- 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? (No Impact)**

The project site is not located within an Airport Referral Area as designated by the Sonoma County Comprehensive Airport Land Use Plan, or within two miles of a public airport. No Impact would result.

3.14 Population and Housing

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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)?			✓	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✓

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)? (Less than Significant)

The proposed project does not involve the construction of new homes or businesses. The project would change the Graton CSD service area boundary to include the property located at 4115 N Gravenstein Highway. As part of the project, the existing Bridgeway Gas Station would be connected to Graton CSD's existing 6-inch sewer main located in Green Valley Road. A lateral connection to Graton CSD's existing sewer main in Green Valley Road may also be constructed for future improvements that may occur on the property, such as a new residential connection. The proposed new sewer main in Green Valley Road would be constructed parallel to an existing sewer main, and would not result in the provision of access to a previously inaccessible area. The project would not expand or modify the Graton CSD wastewater treatment facilities, regional roadways, highways, water supplies, or otherwise remove an obstacle to population growth. The project would create the equivalent of up to 1 new full-time Graton CSD employment opportunity for a truck driver. The project is not anticipated to induce substantial population growth. The impact would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (No Impact)

No housing or people would be displaced by the project and no replacement housing would be required. No impact would result.

3.15 Public Services

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire Protection?				✓
Police protection?				✓
Schools?				✓
Parks?				✓
Other public facilities?				✓

- a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public services? (No Impact)**

As discussed in Section 3.14, Population and Housing, implementation of the project would not induce population growth and, therefore, would not require expanded fire or police protection facilities to maintain acceptable service ratios, response times, or other performance objectives. The project would not result in an increase in student population, and therefore, no new or expanded schools would be required. The project would not result in the increased use of existing parks and other public facilities as it would not induce population growth. The project would not require the expansion of recreational facilities to maintain acceptable service ratios in parks, and would not require the expansion of other public facilities. No impact on public services would result.

3.16 Recreation

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) 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?				✓
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?				✓

- a, b) 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, or include or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (No Impact)**

As discussed in Section 3.14, Population and Housing, implementation of the project would not induce population growth. The use of existing neighborhood and regional parks or other recreational facilities would not change as a result of the project. The project would not include construction activities within an existing recreational property or require new or expanded recreational facilities. No impact would result.

3.17 Transportation

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			✓	
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				✓
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✓	
d) Result in inadequate emergency access?			✓	

a,d) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, or result in inadequate emergency access? (Less than Significant)

Construction of the project would result in a short-term increase in vehicle trips on local roadways, including Highway 116 and Green Valley Road. The addition of construction-related vehicles would not substantially affect congestion on local roadway segments because trips would occur at differing periods of the day and would represent a small percentage of the capacity of the roadways. The temporary impact of increased truck traffic would be less than significant.

Sonoma County Transit Route 20 utilizes Highway 116 and Green Valley Road west of Highway 116 in the project construction area. No bus stops are located within the construction area and Green Valley Road and Highway 116 would remain open to vehicle travel during construction. Therefore, the potential impact on the performance or safety of public transit facilities would be less than significant.

Construction of the project would temporarily alter the normal functionality of Green Valley Road due to the need for a temporary partial lane closure and work within the roadway during installation of the new sewer main. Graton CSD and its construction contractor(s) would be required to prepare traffic control plans for review and acceptance of planned work within the County of Sonoma and Caltrans right-of-way. Implementation of the traffic controls would then be required during construction, including the use of signs, flaggers, scheduling of partial lane closures during off-peak hours, pedestrian and bicycle control devices, notifications/arrangements for any driveway access restrictions, notifications to emergency responders and public transit agencies, and ability to accommodate access by emergency vehicles during construction. Through required compliance with County of Sonoma and Caltrans traffic control requirements, construction activities would not result in substantial adverse effects or conflicts with the local roadway system including bicycle facilities. The impact would be less than significant.

Following construction, the project would not result in an increase in vehicle trips as wastewater is currently transported along the same route as proposed by the project. A change would occur in the overall distance of wastewater transportation, as the project would reduce the length of a one-way wastewater transportation trip from the existing 18 mile route from Occidental CSD Lift Station to the ALWSZ to a 7 mile route to the proposed Graton CSD receiving station. Transport vehicles would be staged and maintained at the Graton CSD WWTP when not in use. Access to and from the Graton CSD WWTP would be provided from Ross Lane and a 700-foot segment of the West County Regional Trail, both of which are currently utilized by worker vehicles and delivery trucks. The project would not alter the existing alignment of Ross Lane or the West County Regional and would result in approximately one to two vehicle trips per day. Operation and maintenance of the project would not conflict with existing transit routes or stops or bicycle and pedestrian facilities, and would not introduce new users of alternative modes of transportation into the area. Operation and maintenance would not affect emergency services or response times in the area. No operational impact would result.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (No Impact)

In November 2017, the Governor's Office of Planning and Research (OPR) released a technical advisory containing recommendations regarding the assessment of vehicle miles travelled (VMT). VMT refers to the amount and distance of automobile travel attributable to a project. As noted in the OPR guidelines, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT. The change to VMT was formally adopted as part of updates to the CEQA Guidelines on December 28, 2018. The current deadline for adopting policies to implement SB 743 and the provisions of CEQA Guidelines section 15064.3(b) is July 1, 2020. The County of Sonoma has not yet adopted VMT policies, and, until the County does, there is no guidance on how to evaluate the proposed project in terms of VMT. Therefore, the project would not conflict with or be inconsistent with an applicable threshold of significance adopted per CEQA Guidelines section 15064.3, subdivision (b). No impact would result.

Implementation of the project would result in a reduction in VMT. Trucks transporting wastewater from the Occidental CSD to the proposed Graton CSD receiving station would travel approximately 7 vehicle miles for a one-way trip. Under existing conditions, trucks transporting wastewater from the Occidental CSD to the ALWSZ WWTF travel approximately 18 vehicle miles for a one-way trip. Therefore, the project would reduce one-way trip lengths by 11 miles compared to baseline conditions.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Less than Significant)

The project would not alter the existing alignment of Green Valley Road or Highway 116. The new pipeline would be located below ground, and existing conditions along the temporarily impacted roads would be restored to pre-existing conditions. The project would improve an existing driveway on the eastern portion of the project site, which would be accessed off of Green Valley Road. The driveway would be constructed as a new 16-foot wide concrete driveway which would conform to the existing edge of pavement of Green Valley Road in accordance with applicable County of Sonoma construction standards. Trucks utilized for transporting wastewater would have back up alarms when pulling out of the driveway onto Green Valley Road, and would not represent an incompatible use along the local roadway network. Transport vehicles would be staged and maintained at the Graton

CSD WWTP when not in use. Access to and from the Graton CSD WWTP would be provided from Ross Lane and a 700-foot segment of the West County Regional Trail, both of which are currently utilized by worker vehicles and delivery trucks. The project would not alter the existing alignment of Ross Lane or the West County Regional and would result in approximately one to two vehicle trips per day, and would not represent an incompatible use. The impact would be less than significant.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k)?		✓		
b) Cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.		✓		

a,b) Cause a substantial adverse change in the significance of a tribal cultural resource? (Less than Significant with Mitigation)

CEQA requires lead agencies to determine if a proposed project would have a significant effect on tribal cultural resources. The CEQA Guidelines define tribal cultural resources as: (1) a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or eligible for listing on the California Register of Historical Resources, or on a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant according to the historical register criteria in Public Resources Code Section 5024.1(c), and considering the significance of the resource to a California Native American tribe.

Efforts to identify tribal cultural resources that could be affected by the project included a records search at the Northwest Information Center, literature review, a sacred lands search through the Native American Heritage Commission, contact with appropriate local Native American Tribes, and a pedestrian archaeological survey of the project site. To date, the Graton CSD has not received requests from California Native American tribes for notifications under Assembly Bill 52.

The Native American Heritage Commission Sacred Lands File search noted that a Sacred Site may be located in the project vicinity. On August 23, 2019, the Sonoma State University Anthropological Studies Center contacted California Native American tribes culturally affiliated with the project area in writing. On August 28, 2019, a response was sent by the Federated Indians of Graton Rancheria (FIGR), requesting the results of the archaeological resources study. On August 30, 2019, a

response was sent by the Stewarts Point Rancheria Kashia Band of Pomo Indians stating that the project is outside of the Aboriginal Territory of their tribe. On September 9, 2019, the results of the archaeological study were shared with the FIGR, who responded on the same day that the project area has the potential to locate tribal cultural resources that have not been previously recorded. FIGR's Tribal Heritage Preservation Officer recommended that a Tribal cultural monitor be on site during the project to ensure its protection should any resource be identified. Therefore, if tribal cultural resources are encountered during construction, a potentially significant impact could occur.

Mitigation

Implementation of Mitigation Measure TCR-1 would reduce the potential impact to tribal cultural resources to a less-than-significant level by implementing a construction monitoring procedure to address discovery of any previously unrecorded resources consistent with appropriate laws and requirements.

Mitigation Measure TCR-1: Protect Tribal Cultural Resources during Construction Activities

The Graton CSD shall coordinate with the Federated Indians of the Graton Rancheria regarding their recommendation for monitoring of tribal cultural resources during construction. If a find qualifies as a tribal cultural resource as defined by CEQA, the Graton CSD shall coordinate with the Federated Indians of Graton Rancheria to ensure that appropriate actions to protect the resource are taken and that no additional resources are affected.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✓	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				✓
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?			✓	
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?			✓	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				✓

- a, c) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects, or 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?? (Less than Significant)**

The proposed project would include a 10-year agreement between Graton CSD and Sonoma Water for transferring of trucking operations and treatment and disposal of Occidental CSD's wastewater. The project would include a new wastewater receiving station on an approximately 1,000 sf portion of the existing Bridgeway Gas Station property at 4155 North Gravenstein Highway, and a new 6-inch sewer main within an existing asphalted section of Green Valley Road. The receiving station would be connected to an existing water line on the property to provide flush water in the event of a spill. The potential environmental impacts associated with construction of the proposed utilities are evaluated as part of this Initial Study. No utility relocation or construction of off-site utilities beyond those identified in the project description and evaluated in this Initial Study would be required that

would cause environmental effects.

The Graton CSD operates in accordance with Waste Discharge Requirements and NPDES Permit No. CA0023639 established by Order No. R1-2018-0001 and currently treats wastewater to Title 22 disinfected tertiary recycled water standards as its primary treatment mode. The proposed project would not require modifications to the Graton CSD wastewater treatment facilities. The project would not increase the amount of wastewater generated within the Occidental CSD or increase the capacity of the wastewater treatment facilities within the Graton CSD. When transport of wastewater is required during peak wet weather periods when flows exceed Graton CSD's capacity to treat, wastewater would be transported to Sonoma Water's ALWSZ WWTF located near the Town of Windsor. The project would not impair the ability of the Graton CSD to continue serving existing or foreseeable future commitments. The impact would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (No Impact)

The project would include a connection to an existing water line on the project site to provide wash water in the event of an accidental spill. The project would not result in a substantial increase in groundwater use, as the project would not result in an increase in population growth or a new high water demand land use. No new regional water supplies or facilities would be required. No impact would result.

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? (Less than Significant)

Construction of the project would result in a temporary increase in solid waste disposal needs associated with demolition and construction wastes, such as demolished asphalt pavement, concrete, and excavated soils. Construction waste with no practical reuse or that cannot be salvaged or recycled would be disposed of at a local transfer station or solid waste facility. Active permitted regional landfills include the Redwood Sanitary Landfill (26 million cubic yards remaining capacity), Potrero Hills Landfill (13.9 million cubic yards remaining capacity), Vasco Road Landfill (7.4 million cubic yards remaining capacity), and Keller Canyon Landfill (63.4 million cubic yards remaining capacity) (CalRecycle 2016). Solid waste generated by the project would represent a small fraction of the daily permitted tonnage of these facilities, therefore, the project's construction-related solid waste disposal needs would be sufficiently accommodated by existing landfills. The impact would be less than significant. Following construction, project operation would not generate additional solid waste. No operational impact would occur.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (No Impact)

No applicable federal solid waste regulations would apply to the project. At the State level, the Integrated Waste Management Act mandates a reduction of waste being disposed and establishes an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. The project would not conflict with or impede implementation of such programs. Following construction, project operation would not generate additional solid waste. No impact would result.

3.20 Wildfire

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
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?				✓
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 or that may result in temporary or ongoing impacts to the environment?				✓
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?				✓

a) Substantially impair an adopted emergency response plan or emergency evacuation plan or exacerbate wildfire risks? (No Impact)

The project site is not located in or near a State Responsibility Area (SRA) or lands classified as very high fire severity zones. The project is located 2 miles from the nearest SRA and approximately 6 miles from lands classified as a very high fire hazard severity zone (CalFire 2019). Therefore, the CEQA Guidelines Appendix G Checklist section for wildfire is not applicable to the project. No impact would result.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✓		
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)?			✓	
c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?		✓		

- a) **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Less than Significant with Mitigation)**

Potential project impacts to biological and cultural resources are addressed in Section 3.4, Biological Resources and Section 3.5, Cultural Resources, respectively. With implementation of the recommended mitigation measures identified in this IS/MND, the potential for project-related activities to degrade the quality of the environment, including fish or wildlife species or their habitat, plant or animal communities, or important examples of California history or prehistory would be reduced to less-than-significant levels.

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)? (Less than Significant)

Cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines Section 15355). Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Efforts to identify cumulative projects included contact with the Graton CSD, the Sonoma County PRMD, review of active PRMD construction and planning permits, review of the current Sonoma County Transportation and Public Works Department project list, and review of the Sonoma County General Services Department Capital Improvement Plan for 2019-2024. Projects identified and considered for cumulative impacts include:

- Planned land acquisition and planning for a Class 1 trail paralleling Green Valley Road between Ross Road and Atascadero Creek, located approximately 0.25 mile west of the project site.
- Planned improvements within Green Valley Creek for flood protection and restoration, located approximately 1.2 miles west of the project site.
- Planned capital improvement projects at the Santa Rosa Delta Pond, located approximately 2 miles east of the project site.
- Planned improvements to the intersection of Highway 116 and Mirabel road and shoulder widening of Mirabel Road, located approximately 2.5 miles northwest of the project site.

As summarized in Section 3 of this IS/MND, the project would not result in impacts on agriculture and forestry resources, mineral resources, land use and planning, population and housing, public services, recreational facilities, or wildfire. Therefore, implementation of the project would not contribute to any related cumulative impact on those resources.

The distance between the project site and the identified cumulative projects would prevent the potential for cumulative impacts in the project area related to aesthetics, air quality, biological resources, noise, and traffic. None of the cumulative projects are located adjacent to the project site or the affected project roadways. The nearest identified cumulative project would include acquisition and planning for a future Class 1 trail paralleling Green Valley Road between Ross Road and Atascadero Creek approximately 0.25 mile west of the project site. Based on current schedules, the construction of the cumulative project would not overlap with the pipeline construction that would occur within Green Valley Road for the project. Given the distance and dissimilarity between the project site and the identified cumulative projects, the project impacts summarized in this IS/MND would not add appreciably to any existing or foreseeable future significant cumulative impact. Incremental impacts, if any, would be very small, and the cumulative impact would be less than significant.

c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly? (Less than Significant with Mitigation)

With implementation of the recommended mitigation measures identified in this IS/MND, the potential for project-related activities to cause substantial adverse effects on human beings would be reduced to less-than-significant levels.

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5. Report Preparers

5.1 Graton Community Services District

Jose Ortiz, PE, General Manager

5.2 GHD

Brian Bacciarini, Senior Environmental Scientist

Andrea Hilton, Environmental Scientist

Marlys Jeane, Environmental Planner

Joslyn Curtis, Biologist

5.3 Subconsultants

Scott McGaughey, Staff Archaeologist, Anthropological Studies Center