# INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION

### Cloverdale High School Stadium Project

Prepared for:

#### **Cloverdale Unified School District**

97 School Street Cloverdale, CA 95425 Contact: Jeremy Decker, Superintendent

Prepared by:

853 Lincoln Way, Suite 208 Auburn CA 95603

Contact: Katherine Waugh

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# Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AC	Asphalt concrete
ACOE	U.S. Army Corps of Engineers
APE	Area of Potential Effect
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CO <sub>2</sub> E	Carbon dioxide equivalent
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CUSD	Cloverdale Unified School District
dB	Decibel
dBA	A-weighted decibel
EO	Executive Order
GHG	Greenhouse gas
GWP	Global warming potential
IS	Initial Study
L <sub>dn</sub>	Day/night average noise level
LED	Light emitting diode
MBTA	Migratory Bird Treaty Act
MLD	Most likely descendent
MND	Mitigated Negative Declaration
MMRP	Mitigation Monitoring and Reporting Program
MT	Metric tons
MT/yr	Metric tons per year
NAHC	Native American Heritage Commission
NOx	Nitrogen Oxides
NSCAPCD	Northern Sonoma County Air Pollution Control District
NWIC	Northwestern Information Center
PM <sub>2.5</sub>	Fine particulate matter
PM <sub>10</sub>	Coarse particulate matter
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board
SAA	Streambed Alteration Agreement
SWPPP	Stormwater Pollution Prevention Plan
USFWS	U.S. Fish and Wildlife Service
VMT	Vehicle miles traveled

CLOVERDALE HIGH SCHOOL STADIUM PROJECT

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# 1 Introduction

### 1.1 Project Overview

The proposed project involves upgrades to the existing Cloverdale High School Stadium. This includes replacement of the dirt track with a seven-lane all weather surface; replacement of the existing turf at the football field with synthetic turf; installation of subdrains under the football field, a storm drain system along the perimeter of the field, an irrigation system for the synthetic turf field for wash down purposes, and main irrigation lines to accommodate a sod field should the District determine that the synthetic turf must be replaced; replacement of light fixtures on four of the existing field light poles with new LED fixtures and removal of two existing light poles; removal of two small sections of bleachers on the eastern side of the track; and resurfacing or replacement of approximately 500 square feet of existing asphalt concrete (AC) between the track and School Street.

### 1.2 California Environmental Quality Act Compliance

The proposed Cloverdale High School Stadium project is a project under the California Environmental Quality Act (CEQA). The project is proposed by the Cloverdale Unified School District (CUSD), and the CUSD is the Lead Agency under CEQA in accordance with Section 15051 of the CEQA Guidelines.

This document is an Initial Study (IS) and proposed Mitigated Negative Declaration (MND) prepared by Dudek on behalf of CUSD pursuant to Title 14 of the California Code of Regulations, Section 15063 of the California Environmental Quality Act (CEQA) Guidelines. Section 15063 of the Guidelines requires the Lead Agency to prepare an IS to analyze the potential environmental impacts associated with a project to determine if the project could have a significant effect on the environment. This IS/MND has been prepared (per CEQA Guidelines Sections 15070-15075) to identify potential environmental impacts of the proposed Cloverdale High School Stadium project and to identify mitigation measures to avoid or reduce the significance of those impacts. CEQA requires the Lead Agency to adopt a mitigation monitoring and reporting program (MMRP) for all required mitigation measures. The draft MMRP is attached as Appendix A to this IS/MND.

# 1.3 Project Planning Setting

The proposed project would modify the existing stadium and track at the Cloverdale High School. The existing stadium and track are located on a 5-acre site located on the south side of School Street and west of North Cloverdale Boulevard in Cloverdale CA. The project site includes multiple non-natural land types and structures, including a dirt track, grass football field, two bleachers, shed, and ticket kiosk. The remainder of the site contains mowed lawns and sparsely vegetated, ruderal areas. The site is bounded by urban development, including homes and school buildings and related facilities.

The high school campus address is 509 North Cloverdale Boulevard. The stadium is located in the southern portion of the campus, south of School Street, as shown in Figure 1, Project Vicinity and Location. The project site falls within Township 11 North, Range 10 West, and Sections 7 and 18 within the Cloverdale U.S. Geological Survey 7.5-minute quadrangle. The project site is located in the City of Cloverdale (City) in the northern portion of Sonoma County (County). The project site is composed of one parcel (APN: 001-141-022).

### 1.4 Public Review Process

The IS/MND is subject to a 30-day public review period. The public is encouraged to provide written comments during the 30-day review, and/or attend the Board of Directors hearing at which the project and the Initial Study and proposed Mitigated Negative Declaration will be considered for approval. In accordance with Section 15074 of the CEQA Guidelines, CUSD's Board of Directors must consider the Initial Study and proposed Mitigated Negative Declaration along with any comments received during the public review process. Comments may be submitted to CUSD at <a href="mailto:deckerj@cusd.org">deckerj@cusd.org</a> or by U.S. mail at:

ATTN: Jeremy Decker, Superintendent Cloverdale Unified School District 97 School St Cloverdale, CA 95425

This IS/MND has been made available for download or viewing at CUSD's website (<a href="https://cloverdale-ca.schoolloop.com/">https://cloverdale-ca.schoolloop.com/</a>), CUSD's main office in Cloverdale, California, and provided for review to State agencies via the California State Clearinghouse. In accordance with Section 15072 of the CEQA Guidelines, notice of the document's availability and intent to adopt an MND has been published in the Cloverdale Reveille newspaper, filed at Sonoma County Clerk's office, and provided via direct mailings and emails to stakeholders, local agencies, and other parties that have expressed interest in the proposed project.

# 2 Summary of Findings

### 2.1 Environmental Factors Potentially Affected

This IS analyzes the environmental impacts of the project consistent with the format and analysis prompts provided in Appendix G of the CEQA Guidelines. The analysis determined that the project would result in potential adverse impacts associated with the following resource categories: Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, and Tribal Cultural Resources. The analysis determined that all impacts identified in this IS would be reduced to less-than-significant levels with implementation of mitigation measures to avoid or minimize the impacts identified. Detailed analyses of impacts are provided under each resource section evaluated in this IS.

### 2.2 Environmental Determination

CUSD finds that this Initial Study identifies potentially significant impacts, but that implementing the mitigation measures identified in Table 2-1 would avoid or minimize the impacts such that they would be less than significant. The proposed project would result in no impacts that would remain significant following implementation of mitigation measures. All mitigation measures are identified by analysis topic in Table 2-1, below.

Table 2-1
Mitigation Measures

Measure Number	Measure Text
BIO-1	<b>Nesting Bird Survey and Avoidance.</b> A qualified biologist shall conduct a survey for nesting birds approximately two days prior to vegetation removal or ground-disturbing activities during the nesting season (March through August). The survey shall cover the limits of construction and suitable nesting habitat within 500 feet for raptors and 100 feet for other nesting birds, as feasible.
	If any active nests are observed during surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest. The buffer distance will typically range from 50 to 300 feet and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.
BIO-2	Avoided Habitat Fencing and Best Management Practice Installation. Prior to the initiation of ground disturbance activities, the limits of disturbance shall be fenced and sediment and erosion control measures shall be utilized, which could include, but not be limited to: biodegradable straw wattles free of weed seeds, silt fencing, or biodegradable erosion control mats/blankets. No construction, staging, or other ground disturbance activities shall be permitted beyond the fencing.

Table 2-1 Mitigation Measures

Measure Number	Measure Text
BIO-3	Mitigation for Riparian Vegetation Impacts. If riparian vegetation removal and/or disturbance to the bed, bank, or channel of the intermittent drainage is necessary for project implementation, a Streambed Alteration Agreement (SAA), pursuant to Section 1602 of the California Fish and Game Code, shall be procured from the California Department of Fish and Wildlife (CDFW) prior to any disturbances to these areas. As part of the SAA, compensatory mitigation may be required to offset the loss of riparian habitat. If so, a mitigation plan shall be drafted by a qualified biologist to address implementation and monitoring requirements under the SAA to ensure that the project would result in no net loss of habitat functions and values. The plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, performance criteria, monitoring methods, and actions to be taken in the event that the mitigation is not successful. The plan shall be approved by the District and CDFW and any required compensatory mitigation shall take place either onsite or at an appropriate off-site location as approved by the CDFW and the District at a ratio directed by the SAA.  Regardless of the requirements of the SAA, if riparian vegetation removal is necessary, a qualified botanist shall conduct a pre-construction survey to identify and quantify the number of plants that could be potentially removed or disturbed. The botanist shall prepare a propagation and planting plan to offset the loss of any vegetation/plants to be removed or disturbed at a 1:1 ratio to ensure no net loss of the riparian vegetation community. The plan shall contain, at a minimum the following components: goals and objectives; a description of the extent of plants/vegetation to be removed or disturbed; plant collection, propagation, and planting methods; locations on the project site in which the plants will be transplanted; monitoring methods, timing, and performance criteria; measur
BIO-4	Restoration of Temporary Vegetation Impacts. Natural land cover types temporarily impacted by project construction shall be restored with appropriate native vegetation. Areas to be restored shall be identified by a qualified biologist as being able to feasibly support the proposed native revegetation. Feasibility of native revegetation is primarily based on suitable soils, slopes, and aspect, as well as the presence of similar native vegetation adjacent to the proposed mitigation areas.
	The project proponent shall be responsible for developing and implementing a conceptual restoration plan for the temporarily impacted areas. The plan shall, at a minimum, include an implementation schedule, planting/seeding plan, invasive species eradication methods, interim and final success criteria/performance standards, estimated costs, and identification of responsible entities. The conceptual restoration plan shall be approved by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board prior to construction of the proposed project

Table 2-1 Mitigation Measures

Measure Number	Measure Text
BIO-5	Aquatic Resource Impact Permitting and Compensation. If any wetlands or other waters of the U.S. in the project site shall be directly impacted by the placement of fill material, the District shall obtain an individual or nationwide permit from the Army Corps of Engineers (ACOE) prior to such activity. As part of the ACOE permit, compensatory mitigation may be required, at a ratio to be determined by the ACOE, to offset the loss of wetland/waters habitat. If so, and as part of the permit application process, a qualified biologist shall draft a mitigation and monitoring plan to address implementation and monitoring requirements under the permit to ensure that the project would result in no net loss of habitat functions and values. The plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, monitoring methods and performance criteria, extent of monitoring to be conducted, actions to be taken in the event that the mitigation is not successful, and reporting requirements. The plan shall be approved by ACOE and compensatory mitigation shall take place either on site or at an appropriate off-site location as approved by the ACOE.
	Concurrent with the ACOE permit, the District shall also obtain a Water Quality Certification from the RWQCB, subject to the same mitigation plan requirements stated above. Any work within the bed or bank of the intermittent drainage, ditch 4, or within the abutting riparian woodland, would require authorization from CDFW under a California Fish and Game Code Section 1600 Streambed Alteration Agreement. Trimming or removal of riparian vegetation may also require compensatory mitigation, as directed by MM BIO-3 and BIO-4
CUL-1	Unanticipated Cultural Resource Discovery. In the event that unanticipated discoveries of cultural resources are encountered during future project undertakings, all activity shall cease within 50 feet of the find until a qualified archaeologist can determine the significance of the find and appropriate mitigation. Examples of prehistoric resources may include: stone tools and manufacturing debris; milling equipment such as bedrock mortars, portable mortars, and pestles; darkened or stained soils (midden) that may contain dietary remains such as shell and bone; as well as human remains. Historic resources may include: burial plots; structural foundations; mining spoils piles and prospecting pits; cabin pads; and trash scatters consisting of cans with soldered seams or tops, bottles, cut (square) nails, and ceramics; paleontological resources.
	In the event that unanticipated archaeological or paleontological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; PRC Section 21082) the archaeologist may record the find to appropriate standards (thereby addressing any data potential) and allow work to continue. If the archaeologist observes

Table 2-1 Mitigation Measures

Measure Number	Measure Text			
	the discovery to be potentially significant under CEQA or Section 106 of the National Historic Preservation Act, additional efforts may be warranted as recommended by the qualified archaeologist.			
CUL-2	Human Remains Discoveries. In accordance with Section 7050.5 of the California Health and Safety Code, if potential human remains are found, all work within 100 feet shall be suspended and the county coroner shall be immediately notified of the discovery. The coroner shall provide a determination within 48 hours of notification. No further excavation or disturbance of the identified material, or any area reasonably suspected to overlie additional remains, shall occur until a determination has been made. If the county coroner determines that the remains are, or are believed to be, Native American, they shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendent (MLD) from the deceased Native American. Within 48 hours of their notification, the MLD will recommend to the lead agency their preferred treatment of the remains and associated grave goods.			
GEO-1	<b>Erosion Control.</b> In order to reduce runoff and erosion and minimize the potential of sedimentation as a result of project construction and operation, the District shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) for all construction activities.			
HAZ-1	<ul> <li>Hazardous Materials Management. The following measures shall be implemented prior to and during construction and shall be incorporated into project plans and specifications.</li> <li>All equipment shall be inspected by the contractor for leaks prior to the start of construction and regularly throughout project construction. Leaks from any equipment shall be contained and the leak remedied before the equipment is again used on the site.</li> <li>Best management practices for spill prevention shall be incorporated into project plans and specifications and shall contain measures for secondary containment and safe handling procedures.</li> <li>A spill kit shall be maintained on site throughout all construction activities and shall contain appropriate items to absorb, contain, neutralize, or remove hazardous materials stored or used in large quantities during construction.</li> <li>Project plans and specifications shall identify construction staging areas and designated areas where equipment refueling, lubrication, and maintenance may occur. Areas designated for refueling, lubrication, and maintenance of equipment shall be approved by the City.</li> <li>In the event of any spill or release of any chemical or wastewater during construction, the contractor shall immediately notify the City.</li> </ul>			

Table 2-1 Mitigation Measures

Measure Number	Measure Text				
	<ul> <li>Hazardous substances shall be handled in accordance with Title 22 of the California Code of Regulations, which prescribes measures to appropriately manage hazardous substances, including requirements for storage, spill prevention and response and reporting procedures.</li> </ul>				
NOISE-1	<b>Noise Control.</b> CUSD and its construction contractors shall implement the following practices to limit noise exposure adjacent to the project site:				
	<ol> <li>Noise-generating construction activities shall be limited to Monday through Friday between the hours of 7am to 7pm and Saturdays between the hours of 7 am and 4 pm.</li> </ol>				
	2. No construction shall occur on federal holidays.				
	3. At least two weeks prior to the start of construction, information regarding the construction schedule and a CUSD contact person shall be posted at the CUSD website, available at the CUSD district office, provided to adjacent property owners by U.S. mail and/or e-mail, and posted at the School Street driveway that access the stadium site.				
	<ol> <li>All internal combustion construction equipment shall be equipped with mufflers in working order.</li> </ol>				
	5. All stationary equipment shall be located as far as feasible from adjacent residences.				

CLOVERDALE HIGH SCHOOL STADIUM PROJECT

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# 3 Initial Study Checklist

#### 1. Project title:

Cloverdale High School Stadium project

#### 2. Lead agency name and address:

Cloverdale Unified School District 97 School St Cloverdale, CA 95425

#### 3. Contact person and phone number:

Jeremy Decker, Superintendent, Cloverdale Unified School District

Phone: (707) 894-1993 Email: deckerj@cusd.org

#### 4. Project location:

The approximately 5-acre Cloverdale High School Stadium Improvement Project (project) site is located at the school's existing stadium and track on the south side of School Street and west of North Cloverdale Boulevard in Cloverdale CA. The high school campus address is 509 North Cloverdale Boulevard, in the City of Cloverdale, Sonoma County, California. The project site is located in Township 11 North, Range 10 West, and Sections 7 and 18 within the Cloverdale U.S. Geological Survey 7.5-minute quadrangle. The approximate center of the site corresponds to 38°48'32.21" north latitude and 123°1'7.77" west longitude.

#### 5. Project sponsor's name and address:

Cloverdale Unified School District 97 School St Cloverdale, CA 95425

#### 6. General plan designation:

General Plan land use designation: Public-Institutional (P-I)

#### 7. Zoning:

Zoning: Public (P)

#### 8. Project Description:

#### **Project Objectives and Description**

The CUSD has identified a need to upgrade the existing Cloverdale High School stadium and track to create an all-weather track surface, correct drainage issues, and increase the energy efficiency and effectiveness of field lighting. These modifications will modernize the existing stadium and track in support of the existing athletic program. The all-weather surface will allow for use of the track throughout winter and spring. However, no substantial changes to the athletic program, such as an increase in the number of track meets and football games held onsite, are expected.

The proposed project would include the construction of a new all-weather track and synthetic turf field in place of an existing grass field and dirt track. As shown on Figure 2, Site Plan, new construction and improvements would include the following components:

- Installation of a new all-weather 7-lane track with a concrete curb around the perimeter of the track, and with the all-weather surfacing extending between the track and both field end zones;
- Installation of a new synthetic turf field;
- Installation of subdrains under the athletic field and a storm drain system for the site;
- Creation of a retention pond at the southeast corner of the site, and extension of stormdrains to the creek south of the site;
- Installation of an irrigation system for the synthetic turf field for wash down purposes and main irrigation lines to accommodate a sod field in the future if necessary;
- Removal of two light poles and replacement of existing light field poles with new LED fixtures;
- Removal of two small sections of bleachers on the eastern side of the track;
- Resurfacing or replacement of approximately 500 square feet of AC paving between the track and School Street;
- Installation of new sod in areas of disturbance:
- 6' high fencing along east side of the field to screen residences; and
- 4' high fencing along the outside of the track.

#### **Utilities and Landscaping**

The synthetic turf would require the installation of subdrains under the field to convey stormwater and natural drainage across the property. The pipe would be between 4 feet and 8 feet underground before it drains into a retention pond south of the field. From the retention pond, drainage would be conveyed to the creek located adjacent to the southern property boundary. In addition, the proposed project would install a storm drain system along the field perimeter as well as an irrigation system for the turf field and main irrigation lines to accommodate a sod field in the future if necessary. All new stormdrain inlets would have a pre-treatment inlet filter for stormwater treatment before runoff enters the new storm drain piping system. Irrigation lines would be connected to existing connections to City water. The project would also resurface or replace approximately 500 square feet of existing AC paving to provide access to the field from

School Street. The proposed project does not include the construction of new potable water sources or restrooms that would require additional connections to public utilities.

#### **Project Construction**

The total area of disturbance would be approximately 5 acres. It is expected that construction would occur in the summer of 2020 and would involve the following activities:

- Site preparation this would involve the installation of fencing and barricades to prevent access to the work area, installation of temporary best management practices (BMPs) to protect stormwater runoff quality, removal of existing turf and bleachers.
- Grading all areas of the site would be graded and compacted to provide appropriate slopes for site drainage and support for the synthetic turf.
- Trenching and Utilities this would include approximately 3,800 linear feet of trenching, and installation of storm drains and irrigation lines.
- Synthetic Turf Installation the field would be installed with a geotextile material laid over the
  compacted subgrade, which would then be covered with a permeable base a minimum of six
  inches deep. Next, a 14-millimeter-thick shock pad would be placed over the base, followed
  by a layer of artificial turf infill, and finally topped with the artificial turf layer.
- Track Surfacing a concrete curb would be poured around the outer perimeter of the track, with a width of 8 inches below grade and 4.5 inches above grade; the track surface would be installed with an aggregate base layer approximately 6 inches deep above the compacted subgrade, an AC bottom course and an AC top course, each approximately 1.5 inches deep, topped with the synthetic track surface.
- Paving the approximately 500 square-foot driveway area between the track and School Street would be repaved.
- Revegetation all disturbed areas that do not support the synthetic turf, concrete, or AC paving would be revegetated with an erosion control seed mix or other landscaping.

#### Surrounding land uses and setting (Briefly describe the project's surroundings):

The project site is bounded by the Cloverdale High School gymnasium and associated facilities to the north, the CUSD District Office to the northeast, residential land uses to the west and south, and a mixture of residential and institutional (church and library) to the east.

- 10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):
  - US Army Corps of Engineers (ACOE) issuance of permit to authorize fill within wetlands/waters of the US under Section 404 of the Clean Water Act.

- Regional Water Quality Control Board (RWQCB) issuance of a permit to authorize fill of waters of the State and issuance of a water quality certification for impacts to waters of the US under Section 401 of the Clean Water Act.
- California Department of Fish and Wildlife (CDFW) issuance of a streambed alteration agreement to authorize fill within waters of the State.
- RWQCB approval of a Stormwater Pollution Prevention Plan (SWPPP) to ensure that water quality
  is protected both during and after project construction.
- 11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

CUSD has not received any requests for notification from any Native American tribes.

#### **Environmental Factors Potentially Affected**

None of the environmental factors listed below are checked, based on the conclusions in this IS that while the project would have potential adverse effects in some resource areas, all such effects would be reduced to a less-than-significant level with implementation of the mitigation measures identified herein.

Aesthetics	Agriculture and Forestry Resources	Air Quality
Biological Resources	Cultural Resources	Energy
Geology and Soils	Greenhouse Gas Emissions	Hazards and Hazardous Materials
Hydrology and Water Quality	Land Use and Planning	Mineral Resources
Noise	Population and Housing	Public Services
Recreation	Transportation	Tribal Cultural Resources
Utilities and Service Systems	Wildfire	Mandatory Findings of Significance

Deter	rmination (To be completed by the Lead Agency)	
On th	e basis of this initial evaluation:	
	I find that the proposed project COULD NOT have a sign NEGATIVE DECLARATION will be prepared.	ificant effect on the environment, and a
	I find that although the proposed project could have a significant effect in this case because revisions in to by the project proponent. A MITIGATED NEGATIVE DEC	he project have been made by or agreed
	I find that the proposed project MAY have a significant ENVIRONMENTAL IMPACT REPORT is required.	nt effect on the environment, and an
	I find that the proposed project MAY have a "potentially sig unless mitigated" impact on the environment, but at least analyzed in an earlier document pursuant to applicable legat by mitigation measures based on the earlier analysis ENVIRONMENTAL IMPACT REPORT is required, but it mut be addressed.	st one effect (1) has been adequately standards, and (2) has been addressed as described on attached sheets. An
	I find that although the proposed project could have a significate potentially significant effects (a) have been analyzed adec IMPACT REPORT or NEGATIVE DECLARATION pursuant been avoided or mitigated pursuant to that earlier EN NEGATIVE DECLARATION, including revisions or mitigation proposed project, nothing further is required.	juately in an earlier ENVIRONMENTAL to applicable standards, and (b) have VIRONMENTAL IMPACT REPORT or
Q.		1/21/2020
Signature		Date

### 3.1 Aesthetics

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	AESTHETICS – Except as provided in Public Resource	s Code Section 210	99, 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 views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				$\boxtimes$

#### Setting

The approximately 5-acre project site is located at the school's existing stadium and track on the south side of School Street and west of North Cloverdale Boulevard in Cloverdale CA. This is part of the Cloverdale High School campus, which is located at 509 North Cloverdale Boulevard. Topography of the project site is mostly flat, with elevations ranging from approximately 354 feet above mean sea level to 367 feet above mean sea level. The project site was originally developed as a sports field in the 1950s, with additional improvements made to the property through 2015 (Appendix E). The project site includes multiple non-natural land types and structures, including a dirt track, grass football field, two bleachers along the western side of the field and two smaller bleachers along the eastern side, storage shed, ticket kiosk, and concessions stand with restrooms and a kitchen. The remainder of the site contains mowed lawns and sparsely vegetated, ruderal areas. The site is bounded by urban development, including homes and school buildings and related facilities. There are no officially designated state scenic highways within the city limits of Cloverdale or Sonoma County around Cloverdale; therefore, the proposed project is not within the viewshed of any state scenic highways (Caltrans 2017).

#### **Impact Discussion**

a) Would the Project have a substantial adverse effect on a scenic vista?

A scenic vista is defined as an expansive view of a scenic setting, whether that setting is natural or constructed. The City of Cloverdale General Plan (Cloverdale 2010) identifies the agricultural lands and hillsides around the perimeter of the city as scenic resources, thus views of these resources could be considered scenic vistas. Hillsides are visible when looking eastward from North Washington Street and when looking westward from North Cloverdale Boulevard. Existing lights at the Cloverdale High School stadium are visible in some of these views. The project would not introduce any new vertical elements that could interfere with views of the agricultural lands and hillsides; in fact, the project includes removal of two of the existing light standards. Thus, the project would have **no adverse impact** on any scenic vistas and could slightly improve views by eliminating two constructed non-scenic features.

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

Figure 3, Site Photographs, provides representative views of the project site. The project site is flat and does not support any rock outcroppings or historic buildings. Trees are present around the site perimeter, with one large conifer located in the northwest corner of the site and several trees along the drainage feature at the eastern site boundary. No tree removal is proposed as part of the project. The site is not visible from any state scenic highways (Caltrans 2017). The project would have **no impact** associated with damage to scenic resources.

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

The project proposes to rebuild and improve an existing track, replace the existing field with synthetic turf, construct drainage infrastructure, replace existing lights and remove two existing light standards, and repave a section of the access driveway between the field and School Street. No tree removal is proposed.

There is one location on North Washington Street that affords a clear view of the southwest corner of the project site – at the bend in the road where it intersects with 4<sup>th</sup> Street. Other views from surrounding streets are filtered and/or screened by existing development and landscaping. During project implementation, construction equipment and materials may be temporarily visible from vantage points located along North Cloverdale Boulevard or North Washington Road, but these views would be temporary, occurring only during construction periods. Revegetation of areas that are disturbed during construction would be completed in accordance with erosion control requirements specified in the project SWPPP, which would help blend these project-affected areas with the surrounding landscape, including the drainage features adjacent to the eastern and southern boundaries of the site.

The project would have **no impact** because post-project conditions would be substantially the same as the current visible conditions and the project would not result in any change in the site's visual character or the consistency of the stadium site with design standards applicable in the project area.

# d) Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The project proposes the removal of two light poles and replacement of existing field lighting with new LED fixtures. The project does not propose an increase in lighting for security or other purposes. Construction may occur over nighttime hours and would introduce temporary sources of light to areas that are normally not illuminated, but construction activities during nighttime would be short term, if necessary at all. Lighting would continue to be used during sporting and afterschool events but there would be no increase in lighting sources or periods of time when lighting is needed. Therefore, the project would have **no impact** associated with light or glare.

#### **Mitigation Measures**

No mitigation measures are required.

# 3.2 Agriculture and Forestry Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II.	AGRICULTURE AND FORESTRY RESOURCES – I significant environmental effects, lead agencies Assessment Model (1997) prepared by the Cali in assessing impacts on agriculture and farmlar timberland, are significant environmental effect California Department of Forestry and Fire Prote Forest and Range Assessment Project and the I measurement methodology provided in Forest I the project:	s may refer to the fornia Departme nd. In determinin s, lead agencies ection regarding t Forest Legacy Ass	c California Agricult nt of Conservation g whether impacts may refer to inforn the state's inventors sessment project;	ural Land Evalua as an optional m to forest resourd nation compiled ry of forest land, and forest carbon	tion and Site nodel to use ces, including by the including the
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 nonagricultural use?				
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				$\boxtimes$
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?				$\boxtimes$

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				$\boxtimes$

#### Setting

The project site is located with the existing Cloverdale High School campus, in the City of Cloverdale. The project site is designated in the City's General Plan as Public-Institutional (Cloverdale 2010) and zoned Public. The project site was originally developed as a sports field in the 1950s (Appendix E).

#### **Impact Discussion**

a) Would the project 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?

The California Farmland Mapping and Monitoring Program designates the land within the City of Cloverdale, including the Cloverdale High School campus, as urban and built-up land (California Resources Agency 2018). The project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and thus the project would have **no impact** because it would not convert any farmland to non-agricultural uses.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Under the Cloverdale General Plan, the project site is designated Public-Institutional (P-I) and under the Cloverdale Ordinance Code, the project site is zoned Public (P). The project would not occur on land zoned or designated for agricultural use; it would not necessitate rezoning and would not conflict with existing zoning. The project site is not under a Williamson Act contract. Therefore, the project would have **no impact**.

c) Would the project 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))?

The project would not occur on land zoned or designated as forestland; it would not necessitate rezoning and would not conflict with existing zoning. Therefore, there will be **no impact**.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The project site is the existing Cloverdale High School stadium and track. The site does not support forest land. The project would not result in permanent loss or conversion of forest land, and therefore, would have **no impact**.

e) Would the project 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?

The project consists of the reconstruction of a high school sport track and field that would serve existing and planned students. There are no farmland, agricultural, or forest lands or activities within or adjacent to the project site. The reconstruction of the school track would not result in the unplanned conservation of farmland or forest land to a non-agricultural or non-forestland uses. Therefore, **no impact** would occur.

#### Mitigation Measures

No mitigation measures are required.

# 3.3 Air Quality

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III.	I. AIR QUALITY – 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?				$\boxtimes$
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				
c)	Expose sensitive receptors to substantial pollutant concentrations?			$\boxtimes$	
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				$\boxtimes$

#### Setting

The project site is within the North Coast Air Basin. The North Sonoma County Air Pollution Control District (NSCAPCD) is the local agency authorized to regulate stationary air quality sources in the Northern Sonoma County. The Federal Clean Air Act and the California Clean Air Act mandate the control and reduction of specific air pollutants. Under these Acts, the U.S. Environmental Protection Agency and the California Air Resources Board have established ambient air quality standards for specific "criteria" pollutants, designed to protect public health and welfare. Primary criteria pollutants include carbon monoxide, reactive organic gases (ROG), nitrogen oxides (NOx), coarse particulate matter (PM10), sulfur dioxide, and lead. Secondary criteria pollutants include ozone (O3), and fine particulate matter (PM2.5). Northern Sonoma County is in

attainment or unclassified (meaning there is insufficient data to determine attainment) with all of the criteria pollutant ambient air quality standards under the state and federal Clean Air Acts.

Sensitive receptors are defined as facilities where sensitive population groups are located, including residences, schools, childcare centers, convalescent homes, and medical facilities. Land uses such as schools and hospitals are considered more sensitive than the general public to poor air quality because of an increased susceptibility to respiratory distress within the populations associated with these uses. The closest sensitive receptors to the project site are existing residences surrounding the project site.

Common sources of odors and odor complaints include wastewater treatment plants, transfer stations, coffee roasters, painting/coating operations, and landfills. The project is located close to small retail shops, electronic stores, and other similar uses that are not common sources of odors.

#### **Impact Discussion**

#### a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

The emission inventories used to develop a region's air quality attainment plans are based primarily on projected population growth and vehicle miles traveled (VMT) for the region, which are based, in part, on the planned growth identified in regional and community plans. Therefore, projects that would result in increases in population or employment growth beyond that projected in regional or community plans could result in increases in VMT above that planned in the attainment plan, further resulting in mobile source emissions that could conflict with a region's air quality planning efforts. Increases in VMT beyond that projected in area plans generally would be considered to have a significant adverse incremental effect on the region's ability to attain or maintain state and federal ambient air quality standards. The project does not include residential development, nor would it require any new permanent employees. Temporary construction activities would result in slight increases in vehicle trips associated with worker commute, materials delivery, and haul truck trips. However, these would be temporary and would only occur during the construction period. Therefore, the project would not change the amount of development projected for Sonoma County and would be consistent with the population growth and VMT projections contained in City of Cloverdale planning documents. Therefore, there would be **no impact**.

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

The proposed project would reconstruct the existing Cloverdale High School track, replace the existing stadium field with synthetic turf, provide drainage improvements and replace existing lighting with LED fixtures. The project would not change the existing operation and use of the stadium and track. Thus, it would not create any new emission sources or increase emissions associated with operation.

As noted above, the project area is not designated non-attainment for any federal or state ambient air quality standards. Further, as demonstrated below, the project would not result in considerable emissions of any criteria pollutants, and CUSD would implement best management practices in compliance with the NSCAPCD Rules to ensure that construction emissions are minimized to the extent feasible. Thus, this impact would be **less than significant**.

During project construction, use of construction equipment would generate pollutant emissions. Construction activities would include removing the existing turf from the field, regrading the field to provide appropriate slope and grading to create a drainage retention basin, trenching to install new stormdrain lines and remove existing stormdrain lines, removal of two existing light standards and two small sections of bleachers, and resurfacing or replacing asphalt pavement in an approximately 500 square foot area between the field and School Street. While detailed construction schedules and specific equipment needs have not yet been identified, it is expected that the project would generally require the use of three to six pieces of equipment, such as graders, dozers, and backhoes, each operating for four to seven hours per day for approximately five months. The site is generally flat and no substantial cuts or fills that would require import or export of large volumes of material are needed.

The Bay Area Air Quality Management District (BAAQMD) has identified a range of project types and sizes that are considered likely to have pollutant emissions that would remain below applicable regulatory thresholds and thus are would not result in significant impacts (BAAQMD 2017). While the project site is located within the NSCAPCD jurisdiction, the NSCAPCD does not provide similar guidance, thus this analysis uses the BAAQMD data for reference. The BAAQMD screening table shows a construction period screening size for a City Park of 67 acres, based on PM emissions. Of the land uses presented within the screening table, City Park is the land use that is most similar to the track and field use at the project site. The project site is less than 10% of the City Park screening size, thus pollutant emissions during construction would be substantially below the BAAQMD daily emissions thresholds.

Further, the CUSD and its construction contractors would be required to comply with NSCAPCD's Rule 430 – Fugitive Dust Emissions by implementing best management practices to ensure that dust emissions (which includes particulate matter) are minimized to the extent feasible. These include covering open bodied trucks when off-hauling any materials removed from the site, use of water or chemicals for control of dust during grading and trenching, stabilizing any materials stockpiles, and removal of earth or other materials when tracked onto paved streets.

#### c) Would the project expose sensitive receptors to substantial pollutant concentrations?

The proposed project would not alter the existing operation and use of the stadium and track and thus would not increase pollutant emissions during operation. As discussed above, use of construction equipment would generate pollutant emissions. However, the project involves limited construction activities that would not generate substantial pollutant concentrations, and would include implementation of required management practices to reduce emissions. Therefore, the project would have a **less than significant impact** associated with exposure of sensitive receptors to substantial pollutant concentrations.

#### d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The proposed project would reconstruct the existing Cloverdale High School track, replace the existing stadium field with synthetic turf, provide drainage improvements and replace existing lighting with LED fixtures. The project would not change the existing operation and use of the stadium and track. Therefore, the project would not introduce new odor producing emissions to the site and would have **no impact** associated with such emissions.

#### **Mitigation Measures**

No mitigation measures are required.

# 3.4 Biological Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV.	<b>BIOLOGICAL RESOURCES</b> – 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 Game 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 Game 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?				

#### Setting

The analysis and mitigation measures in this section are based on the Biological Resources Assessment prepared by Dudek for the project site, which is provided in Appendix B. The project site is located in the Alexander Valley, on the west side of the Russian River. Elevations within the project site vary from

approximately 354 feet above mean sea level in the southeast corner of the project site to 367 feet above mean sea level in the northwest corner of the site. Topography in the project site is mostly flat with slopes gently descending toward the middle and northern portions of the site.

The biological and hydrological resources within the project site and vicinity have been altered over the years by urban development, including the construction of roads, homes, and Cloverdale High School. The project site was originally developed as a sports field in the 1950s (Appendix E). The majority of the site supports two non-natural land cover types: ruderal and developed. As shown on Figure 4, Biological Resources, there is one natural vegetation community type onsite: 0.46 acres of riparian woodland occurs along the southern portion of the site. This area contains the northern portion of the tree canopy that surrounds the unnamed drainage south of the stadium.

Surface run-off in the project site is directed to constructed ditches along the general perimeter of the site, a swale near the northwest corner of the site, and into multiple drainage inlets located throughout the football field at the center of the site. As shown on Figure 4, there are four aquatic habitat or stormwater control features, mapped onsite: one drainage swale, four ditches, and one unnamed, intermittent drainage. The project site includes 0.04 acre (95.54 linear feet) of the intermittent drainage south of the stadium. This feature is expected to meet the criteria for jurisdictional waters of the U.S, subject to verification by the San Francisco District of the ACOE. This feature is also expected to meet the criteria for jurisdictional waters of the state under the joint jurisdiction of the RWQCB and CDFW. Ditch 4 comprises an additional 0.10 acre (676.02 linear feet) of waters that are anticipated meet the criteria for waters of the state under the jurisdiction of CDFW.

No special-status plant species were documented onsite. Results from searches of the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) database revealed 31 special-status plant species that have potential to occur in the database search area. Eight special-status plant species have a low potential to occur in the project site: small-flowered calycadenia (*Calycadenia micrantha*), swamp harebell (*Campanula californica*), bristly sedge (*Carex comosa*), congested-headed hayfield tarplant (*Hemizonia congesta* ssp. congesta), thin-lobed horkelia (*Horkelia tenuiloba*), Jepson's leptosiphon (*Leptosiphon jepsonii*), beaked tracyina (*Tracyina rostrata*), and Napa bluecurls (*Trichostema ruygtii*). The project site provides poor to marginal habitat for these species due to the disturbed nature of the site and overall dominance of non-natural land cover types and non-native plants. None of these species were observed during the site visit conducted on June 24, 2019, which occurred during the evident and identifiable period for these species, with the exception of Jepson's leptosiphon, which blooms March through May. No species in the genus *Leptosiphon* were observed in the project site during the site survey.

No special-status wildlife species were documented onsite. Results of the CNDDB and U.S. Fish and Wildlife Service (USFWS) searches revealed 18 listed or special-status wildlife species, or species proposed for listing as rare, threatened, or endangered by either the CDFW or the USFWS that have potential to occur in the database search area. Of these, 15 were removed from consideration due to lack of suitable habitat within or adjacent to the project site, or due to the project site being outside of the species' known range. The project site provides potential habitat for grasshopper sparrow, western pond turtle, Townsend's bigear bat and pallid bat. In addition, the project site provides potential habitat for migratory birds and birds of prey and other native bats. However, land covers onsite provide poor quality habitat for a majority of these species due to regular human disturbance and/or a lack of suitable microhabitat features. None of these species were detected during the field survey conducted on June 24, 2019, with the exception of

common and migratory birds protected by California Fish and Game Code and/or the Migratory Bird Treaty Act (MBTA).

#### **Impact Discussion**

a) Would the project 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?

#### **Plants**

Eight special-status plant species have a low potential to occur in the project site, as listed above. The project site provides poor to marginal habitat for these species due to the disturbed nature of the site and overall dominance of non-natural land cover types and non-native plants. None of these species were observed during the site visit conducted on June 24, 2019, which occurred during the evident and identifiable period for these species, with the exception of Jepson's leptosiphon, which blooms March through May. No species in the genus *Leptosiphon* were observed in the project site during the site survey. Thus, no special-status plant species are expected to occur onsite and no impacts to special-status plant species are anticipated as a result of the proposed project

#### Wildife - Listed Species

The project site was evaluated for its potential to support grasshopper sparrow, western pond turtle, Townsend's big-ear bat and pallid bat. However, land covers onsite provide poor quality habitat for these species due to regular human disturbance and/or a lack of suitable microhabitat features.

Grasshopper sparrow has a low potential to occur in the project site. There are no moderately open grasslands with perching options present onsite. In addition, grassy areas onsite experience regular disturbance from mowing and high school sport activities.

Western pond turtle has a low potential to occur in the project site. The intermittent drainage and two vegetated ditches onsite provide only marginal habitat for western pond turtle. The intermittent drainage and two vegetated ditches are generally isolated from other natural aquatic features by underground culverts, which act as barriers to species dispersal. In addition, the onsite drainages generally lack aquatic refugia and aquatic structures for basking. Dense canopy cover above the unnamed drainage onsite greatly reduces the availability of basking habitat, which western pond turtle need for thermoregulation. Uplands of the project site are heavily disturbed and primarily consist of very compacted soils or regularly mowed grassy areas not suitable for nesting. Thus, there is no suitable aquatic, basking, or nesting habitat for this species, and it is unlikely that western pond turtle would disperse to the project site.

Townsend's big-eared bat has a low potential to occur in the project site. There are no limestone caves, lava tubes, or tunnels in the project site. It is unlikely that this species would utilize onsite structures for roosting, as they are located in an area of regular human disturbance. No evidence of roosting (e.g., guano, urine stains, and insect prey remains) was noted in project site during the June 2019 field survey.

Pallid bat has a low potential to occur on the project site. There are no caves, mines, or hollow trees on the project site. In addition, the project site is generally surrounded by urban development, including residential dwellings, commercial buildings, and roadways. It is unlikely that this species would utilize trees or structures onsite for roosting as they are located in an area of regular human disturbance. No evidence of roosting was noted in project site during the June 2019 field survey.

None of these species were detected during the field survey conducted on June 24, 2019. Thus, no special-status wildlife species (other than nesting birds as discussed below) are expected to occur onsite and no impacts to special-status wildlife species are anticipated as a result of the proposed project.

Wildife - Nesting Birds and Native Birds of Prey

Trees, shrubs, and human-made structures in and adjacent to the project site provide potential nesting habitat for a number of local and migratory bird and bird of prey species. Migratory bird species are protected by the federal MBTA and native birds of prey are protected by Section 3503.5 of the California Fish and Game Code (CDFW 2018). Direct impacts to nesting birds would be a significant impact, absent mitigation. In order to avoid adverse effects on nesting birds during construction of the proposed project, pre-construction nesting bird surveys and avoidance measures shall be implemented pursuant to Mitigation Measure BIO-1: Pre-Construction Nesting Bird Surveys and Reporting. With implementation of this mitigation measure to avoid impacts to nesting birds, this impact would less than significant with mitigation incorporated.

b) Would the project 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 U.S. Fish and Wildlife Service?

Implementation of the proposed project would result in ground disturbance and direct, permanent changes to the project site. Developed and ornamental planting land cover characterize the majority of the site, which are not considered sensitive under CEQA. Riparian woodland in and overhanging the project site is considered a sensitive natural community by CDFW. Installation of the retention pond and two outfall structures directed into the intermittent drainage may result in direct impacts to a portion of the riparian woodland. Mitigation Measure BIO-2: Fencing and Best Management Practices would provide protection for the areas of woodland that are adjacent to the site but would not be directly affected by the project. Mitigation Measure BIO-3: Riparian Vegetation requires that CUSD obtain a Streambed Alteration Agreement from CDFW for any riparian vegetation removal and/or disturbance to the bed, bank, or channel of the intermittent drainage that may be necessary for project implementation to ensure that the project would result in no net loss of habitat functions and values. Mitigation Measure BIO-4: Vegetation Restoration requires CUSD restore areas where temporary (construction-only) impacts would occur through vegetation planting and invasive species eradication methods. Implementation of these measures would ensure that there is no net loss in the habitat function and value of the riparian vegetation overhanging and adjacent to the site. Thus, the project would result in a less than significant impact with mitigation incorporated.

c) Would the project 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?

Hydrology within the project site and vicinity has been altered by urban development, including the construction of roads, homes, and Cloverdale High School. Surface run-off in the project site is directed to constructed ditches along the general perimeter of the site, a swale near the northwest corner of the site, and into multiple drainage inlets located throughout the football field at the center of the site. The majority of surface run-off enters an intermittent drainage located in the southeast corner of the project site, which eventually drains into the Russian River via Cloverdale Creek.

The project site supports 0.04 acre (95.54 linear feet) of waters that are anticipated to meet the criteria for jurisdictional waters of the U.S as well as 0.14 acre (771.56 linear feet) of waters that are anticipated to meet the criteria for jurisdictional waters of the state, specifically CDFW and RWCQB. The proposed project would be required to comply with any restrictions or modification by the ACOE, CDFW and RWCQB, as required by the permitting process.

Construction of the proposed project may result in direct impacts to the intermittent drainage south of the stadium. Temporary direct impacts to the drainage may be necessary to install the two outfall structures. Permanent direct impacts to the drainage would result from placement of rip-rap below the two proposed outfall structures. Direct, temporary impacts to the intermittent drainage would be considered potentially significant without implementation of mitigation measures. Mitigation Measure BIO-5: Wetland Restoration requires CUSD to provide for restoration of wetland areas where temporary impacts occur. In addition Mitigation Measure GEO-1: Stormwater Pollution Prevention Plan and Mitigation Measure HAZ-1: Spill Prevention Measures would reduce potential direct and indirect impacts to wetlands by ensuring that appropriate water quality and erosion protection measures are implemented throughout construction. Combined these measures would ensure that direct and indirect impacts to state and federally protected wetlands result in no net loss of the habitat function and value and no impairment of the hydrologic function of the drainages and wetlands adjacent to the project site. Thus, the project would result in a less than significant impact with mitigation incorporated.

The site supports non-jursidictional waters of the U.S. and the State in the form of drainage swales and ditches and artificial wetlands. As CUSD facilities staff currently maintain these features to redistribute stormwater run-off into existing stormwater infrastructure offsite, the drainage swale and three of the ditches in the project site are non-waters of the state, and fill-related impacts to these features would be exempt from regulation under Section 401 of the Clean Water Act.

d) Would the project 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?

The proposed project would reconstruct the existing Cloverdale High School track, replace the existing stadium field with synthetic turf, provide drainage improvements, replace existing lighting with LED fixtures and remove two existing light standards, and repave a section of the access driveway between the field and School Street. No tree removal is proposed.

As discussed in the Biological Resources Assessment in Appendix B, the proposed project site provides little value or function for wildlife movement. The project site is bounded by dense urban development in each direction and the project site itself does not function as a wildlife movement corridor due to the surrounding development and lack of connectivity with other undeveloped areas. In addition, a majority of the project site itself is fenced, which further reduces habitat connectivity in the immediate vicinity. Further, the project would not change the conditions of the project site as they relate to wildlife movement, thus the proposed project would have **no impact** to wildlife movement.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No local policies or ordinances protecting biological resources or provisions of any approved habitat conservation plans would apply to the proposed project. No tree removal is proposed. Therefore, the project would have **no impact**.

f) Would the project 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 Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan applies to the project site and activities. Therefore, the proposed project would have **no impact**.

#### Mitigation Measures

Implementation of Mitigation Measures GEO-1 as presented in Section 3.7 and HAZ-1 as presented in Section 3.9 would contribute to reducing or avoiding the project's impacts to hydrologic function of biological resources. The following mitigation measures are also required:

**BIO-1 Nesting Bird Survey and Avoidance.** A qualified biologist shall conduct a survey for nesting birds approximately two days prior to vegetation removal or ground-disturbing activities during the nesting season (March through August). The survey shall cover the limits of construction and suitable nesting habitat within 500 feet for raptors and 100 feet for other nesting birds, as feasible.

If any active nests are observed during surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest. The buffer distance will typically range from 50 to 300 feet and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.

Avoided Habitat Fencing and Best Management Practice Installation. Prior to the initiation of ground disturbance activities, the limits of disturbance shall be fenced and sediment and erosion control measures shall be utilized, which could include, but not be limited to: biodegradable straw wattles free of weed seeds, silt fencing, or biodegradable erosion control mats/blankets. No construction, staging, or other ground disturbance activities shall be permitted beyond the fencing.

**BIO-3** 

Mitigation for Riparian Vegetation Impacts. If riparian vegetation removal and/or disturbance to the bed, bank, or channel of the intermittent drainage is necessary for project implementation, a Streambed Alteration Agreement (SAA), pursuant to Section 1602 of the California Fish and Game Code, shall be procured from the California Department of Fish and Wildlife (CDFW) prior to any disturbances to these areas. As part of the SAA, compensatory mitigation may be required to offset the loss of riparian habitat. If so, a mitigation plan shall be drafted by a qualified biologist to address implementation and monitoring requirements under the SAA to ensure that the project would result in no net loss of habitat functions and values. The plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, performance criteria, monitoring methods, and actions to be taken in the event that the mitigation is not successful. The plan shall be approved by the District and CDFW and any required compensatory mitigation shall take place either onsite or at an appropriate off-site location as approved by the CDFW and the District at a ratio directed by the SAA.

Regardless of the requirements of the SAA, if riparian vegetation removal is necessary, a qualified botanist shall conduct a pre-construction survey to identify and quantify the number of plants that could be potentially removed or disturbed. The botanist shall prepare a propagation and planting plan to offset the loss of any vegetation/plants to be removed or disturbed at a 1:1 ratio to ensure no net loss of the riparian vegetation community. The plan shall contain, at a minimum the following components: goals and objectives; a description of the extent of plants/vegetation to be removed or disturbed; plant collection, propagation, and planting methods; locations on the project site in which the plants will be transplanted; monitoring methods, timing, and performance criteria; measures to be taken in the event that the propagation and planting is not successful; and reporting requirements. The plan shall be approved by the District.

**BIO-4** 

Restoration of Temporary Vegetation Impacts. Natural land cover types temporarily impacted by project construction shall be restored with appropriate native vegetation. Areas to be restored shall be identified by a qualified biologist as being able to feasibly support the proposed native revegetation. Feasibility of native revegetation is primarily based on suitable soils, slopes, and aspect, as well as the presence of similar native vegetation adjacent to the proposed mitigation areas.

The project proponent shall be responsible for developing and implementing a conceptual restoration plan for the temporarily impacted areas. The plan shall, at a minimum, include an implementation schedule, planting/seeding plan, invasive species eradication methods, interim and final success criteria/performance standards, estimated costs, and identification of responsible entities. The conceptual restoration plan shall be approved by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board prior to construction of the proposed project.

BIO-5

Aquatic Resource Impact Permitting and Compensation. If any wetlands or other waters of the U.S. in the project site shall be directly impacted by the placement of fill material, the District shall obtain an individual or nationwide permit from the Army Corps of Engineers (ACOE) prior to such activity. As part of the ACOE permit, compensatory mitigation may be required, at a ratio to be determined by the ACOE, to offset the loss of wetland/waters habitat. If so, and as part of the permit application process, a qualified biologist shall draft a mitigation and monitoring plan to address implementation and monitoring requirements under the permit to ensure that the project would

result in no net loss of habitat functions and values. The plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, monitoring methods and performance criteria, extent of monitoring to be conducted, actions to be taken in the event that the mitigation is not successful, and reporting requirements. The plan shall be approved by ACOE and compensatory mitigation shall take place either on site or at an appropriate off-site location as approved by the ACOE.

Concurrent with the ACOE permit, the District shall also obtain a Water Quality Certification from the RWQCB, subject to the same mitigation plan requirements stated above. Any work within the bed or bank of the intermittent drainage, ditch 4, or within the abutting riparian woodland, would require authorization from CDFW under a California Fish and Game Code Section 1600 Streambed Alteration Agreement. Trimming or removal of riparian vegetation may also require compensatory mitigation, as directed by MM BIO-3 and BIO-4.

### 3.5 Cultural Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
٧.	/. CULTURAL RESOURCES - 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 dedicated cemeteries?		$\boxtimes$		

#### Setting

The analysis and mitigation measures in this section are based on the Cultural Resources Inventory Report prepared by Dudek for the project site, which is provided in Appendix C. A records search was completed for the Area of Potential Effect (APE) for the project and a half-mile buffer by staff at the Northwest Information Center (NWIC) at California State University Sonoma on July 17, 2019. The records search identified 50 previous studies which have been performed within a half-mile radius of the records search area. The records search did not identify any cultural resources within the APE, however 33 cultural resources have been identified within a half-mile of the APE. Of these, 6 are prehistoric resource sites and 27 are historic buildings.

The project site was originally developed as a sports field in the 1950s (Appendix E). Dudek's review of historic aerial photographs show that as early as 1971, the project site consisted of a football field encircled by an un-paved track. Development continued in the project vicinity, including improvements to the stadium area, and by 2005, the APE appears generally as it does today, although additional improvements, including

adding the kitchen to the concession stand and installing new bleachers, were completed between 2006 and 2015. The APE is surrounded by development including parks, roads, and residential buildings.

Dudek Archaeologist Ross Owen, MA, RPA conducted the intensive-level pedestrian survey of the entire project APE on August 9, 2019 using standard archaeological procedures and techniques. Native ground surface visibility was variable and was restricted areas by existing development or low-laying vegetation.

No cultural material or indications of cultural resources deposits were observed in this area. An unnamed creek flows in a channelized drainage along the southern and eastern limits of the project site. All natural and erosional subsurface exposures along the creek and rodent burrows were inspected, as well as exposed patches of topsoil within the track and field complex. Approximately 30% of the exposed ground surface was directly observable. Evidence of cut and fill activity is observed on the north and east of the athletic field, and channelization of drainage to the east and south of the fields has occurred.

Approximately 10 displaced historic-era ceramics, possibly from the same original white-ware plate, and machine-made bottle glass were identified to be intermixed with modern refuse within and adjacent to a spoils pile in the southeastern corner of the fenced-in track and field area. Additionally, brick fragments, cement, and bottle glass of mixed possible historic-era and modern age were also present in the channelized creek banks and creek-bed. Based on observation of mixed historic-era material with modern construction and other refuse, it appears that this material has been redeposited from elsewhere in the past, likely due to stream channelization and maintenance over time. Recordation of these materials as cultural resources is not appropriate. Inspection of historical aerial imagery and maps did not reveal any historic-era structures within the project area that suggest the presence of intact subsurface deposits of archaeological significance. As such, the proposed project is unlikely to impact any significant archaeological deposits.

#### **Impact Discussion**

# a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

The proposed project would reconstruct the existing Cloverdale High School track, replace the existing stadium field with synthetic turf, provide drainage improvements, replace existing lighting with LED fixtures and remove two existing light standards, and repave a section of the access driveway between the field and School Street. The project would not change the existing operation and use of the stadium and track.

There are no historic-era structures within project site. The proposed project would have **no impact** associated with changes in the significance of a historical resource.

# b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The NWIC records indicated that no archaeological resources have been previously recorded within the project APE. Dudek's archival research for the project indicates that there is a low sensitivity for encountering potential subsurface archaeological deposits. No resources were identified in the project disturbance area. Modern and historic disturbances have disturbed near-surface sediments throughout the project disturbance area. This disturbance suggests there is little to no potential to encounter

unidentified significant cultural resources in the disturbance area. In addition, the NAHC Sacred Lands File search did not indicate that cultural resources are in the vicinity of the project site and subsequent tribal information requests have not yielded any responses to date which provide information or concerns about the project site. Finally, the cultural resources pedestrian survey of the project area of disturbance was negative for archaeological resources.

Although the research and site survey found no evidence of cultural resources being present at the site, there is a potential that project construction could disturb previously unknown archeological or historic resources during ground disturbing activities. Mitigation Measure CUL-1 would ensure that construction would stop and appropriate protective measures are taken in the event that unanticipated discovery of a cultural resource occurs. Therefore, the project impact will be **less than significant with mitigation incorporated**.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

While unlikely, there is some potential that earth disturbance associated with the proposed project could disturb or uncover human remains. With the implementation of Mitigation Measure CUL-2, which prescribes measures to appropriately address the inadvertent discovery of human remains, project impacts from potential disturbance of human remains would be **less than significant with mitigation incorporated**.

#### Mitigation Measures:

CUL-1 Unanticipated Cultural Resource Discovery. In the event that unanticipated discoveries of cultural resources are encountered during future project undertakings, all activity shall cease within 50 feet of the find until a qualified archaeologist can determine the significance of the find and appropriate mitigation. Examples of prehistoric resources may include: stone tools and manufacturing debris; milling equipment such as bedrock mortars, portable mortars, and pestles; darkened or stained soils (midden) that may contain dietary remains such as shell and bone; as well as human remains. Historic resources may include: burial plots; structural foundations; mining spoils piles and prospecting pits; cabin pads; and trash scatters consisting of cans with soldered seams or tops, bottles, cut (square) nails, and ceramics; paleontological resources.

In the event that unanticipated archaeological or paleontological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; PRC Section 21082) the archaeologist may record the find to appropriate standards (thereby addressing any data potential) and allow work to continue. If the archaeologist observes the discovery to be potentially significant under CEQA or Section 106 of the National Historic Preservation Act, additional efforts may be warranted as recommended by the qualified archaeologist

CUL-2 Human Remains Discoveries. In accordance with Section 7050.5 of the California Health and Safety Code, if potential human remains are found, all work within 100 feet shall be suspended and the county coroner shall be immediately notified of the discovery. The coroner shall provide a determination within 48 hours of notification. No further excavation or disturbance of the identified material, or any area reasonably suspected to overlie additional remains, shall occur until a determination has been made. If the county

coroner determines that the remains are, or are believed to be, Native American, they shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendent (MLD) from the deceased Native American. Within 48 hours of their notification, the MLD will recommend to the lead agency their preferred treatment of the remains and associated grave goods.

## 3.6 Energy

VI Energy Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:	1	T	Γ	ı
Result in potentially significant environmental impact 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?				

### Setting

The project site is located within Cloverdale, within Sonoma County and has been previously developed as a track for the adjacent high school.

#### Impact Discussion

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

The proposed project would reconstruct the existing Cloverdale High School track, replace the existing stadium field with synthetic turf, provide drainage improvements, replace existing lighting with LED fixtures and remove two existing light standards, and repave a section of the access driveway between the field and School Street. By replacing existing lighting with LED fixtures, the project would result in a decrease in energy consumption associated with field lighting. None of the other project components would result in an increase energy use associated with operation and maintenance of the facilities because there would be no change in the existing operation and use of the stadium and track.

The proposed project would require a small increase in the use of petroleum products during construction. Construction would occur within the project site over the course of approximately five months. Construction of the project would be temporary and would be carried out using equipment and vehicles operating in compliance with fuel standards. Therefore, the project impact would be **less than significant**.

### b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As discussed in response a) above, the project would not change the existing operation and use of the stadium and track and associated energy consumption. By replacing existing lighting with LED fixtures, the project would result in a slight improvement in energy efficiency at the project site. The project would have **no adverse impact** associated with renewable energy or energy efficiency.

### **Mitigation Measures**

No mitigation measures are required.

## 3.7 Geology and Soils

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact			
VII.	VII. GEOLOGY AND SOILS – Would the project:							
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:							
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist- Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.							
	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 waste water disposal systems where sewers are not available for the disposal of waste water?							

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				

#### Setting

The analysis and mitigation measure in this section are based on the Limited Geotechnical Investigation prepared for the project site by GeoCon, which is provided in Appendix D. The proposed project would reconstruct the existing Cloverdale High School track, replace the existing stadium field with synthetic turf, provide drainage improvements, replace existing lighting with LED fixtures and remove two existing light standards, and repave a section of the access driveway between the field and School Street. The project would not change the existing operation and use of the stadium and track. No new structures would be introduced to the project site.

The project site does not contain any known Alquist-Priolo Earthquake Fault Zones, as listed by the California Geological Survey. According to the Fault Activity Map of California and Adjacent Areas, no active faults are located on the project site. Additionally, the proposed project is located in an area with the lowest designation for the potential for earthquake shaking. The proposed project is not located in an area with a high chance of liquefaction or landslides (Appendix D).

### **Impact Discussion**

- a) Would the project 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?

The site is not located near any known Alquist-Priolo Earthquake Fault Zones, as listed by the California Geological Survey. According to the Fault Activity Map of California and Adjacent Areas, no active faults are located on the project site. Risks associated with seismic-related activity such as rupture of a fault, strong ground shaking, and ground failure would be less than significant as a result of compliance with applicable codes and the lack of structures proposed. The project includes no elements that would increase the risk or susceptibility of the site to landslides and the potential for liquefaction is low to due to the lack of

groundwater and the dense nature of the rock beneath the site. Risks associated with landslide or seismic activity would be **less than significant**.

### b) Would the project result in substantial soil erosion or the loss of topsoil?

The project would result in approximately 5 acres of ground disturbance, including removing the existing turf from the field, regrading the field to provide appropriate slope and grading to create a drainage retention basin, trenching to install new stormdrain lines and remove existing stormdrain lines, removal of two existing light standards and two small sections of bleachers, and resurfacing or replacing asphalt pavement in an approximately 500 square foot area between the field and School Street. Vegetation removal, grading, and trenching can expose soil to the potential for erosion due to wind and/or precipitation and storm drainage; further, such erosion could contribute to adverse water quality effects in nearby drainage features. These impacts are considered potentially significant.

All areas disturbed during construction would be stabilized in accordance with erosion control best management practices (BMPs) identified in project plans and as specified in the SWPPP required for the project and as identified in Mitigation Measure GEO-1. The SWPPP would be prepared as required to obtain coverage under the State Construction General Permit and will specify the use of appropriate BMPs for erosion control and spill prevention during and following construction. BMPs would include measures to stabilize work areas including fiber wattles, silt fencing, concrete washout areas, soil stabilizers, revegetation, or other appropriate measures. These measures would ensure that soil erosion during and after project construction is prevented. With implementation of Mitigation Measure GEO-1, the impact would be less than significant with mitigation incorporated.

c) Would the project 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?

The project site is not located within an area with any known geologic or soil instability. The proposed project would reconstruct and improve an existing track and associated infrastructure that would be constructed in accordance with applicable codes that would not exert high loads on the ground surface and would not be expected to result in any increased risk of ground failure. Therefore, impacts associated with an unstable geologic unit or soil would be **less than significant**.

d) Would the project 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?

Project design and construction would be in accordance with Uniform Building Code Zone 3 standards, which take into account local conditions. The project design and construction be in accordance with recommendations of a California registered engineering geologist to ensure it is constructed in consideration of site-specific conditions as determined by the geotechnical investigation included in Appendix D. Therefore, the project would have a **less than significant** impact associated with expansive or otherwise unstable soils.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Cloverdale High School is served by the public sewer system in the City of Cloverdale and the project would not involve the uses of septic tanks or other wastewater disposal systems. There would be **no impact**.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The project site contains no known paleontological resources or unique geologic features and is not within an area considered sensitive for these resources. Potential impacts associated with effects to unique paleontological or geologic features would be **less than significant**.

### Mitigation Measures

**GEO-1 Erosion Control.** In order to reduce runoff and erosion and minimize the potential of sedimentation as a result of project construction and operation, the District shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) for all construction activities.

### 3.8 Greenhouse Gas Emissions

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact		
VIII	VIII. GREENHOUSE GAS EMISSIONS – Would the project:						
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			$\boxtimes$			
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?						

### Setting

Greenhouse gases (GHGs) are gases that absorb infrared radiation in the atmosphere. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature. Global climate change concerns are focused on whether human activities are leading to an enhancement of the greenhouse effect. Principal GHGs include carbon dioxide, methane, nitrous oxide, O<sub>3</sub>, and water vapor. If the atmospheric concentrations of GHGs rise, the average temperature of the lower atmosphere will gradually increase. Globally, climate change has the potential to impact numerous environmental resources though uncertain impacts related to future air temperatures and precipitation patterns. Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. Climate change is already affecting California: average temperatures have increased, leading to more extreme hot days and fewer cold nights; shifts in the water cycle have been observed, with less winter precipitation falling as

snow, and both snowmelt and rainwater running off earlier in the year; sea levels have risen; and wildland fires are becoming more frequent and intense due to dry seasons that start earlier and end later (CAT 2010).

The effect each GHG has on climate change is measured as a combination of the mass of its emissions and the potential of a gas or aerosol to trap heat in the atmosphere, known as its global warming potential (GWP), which varies among GHGs. Total GHG emissions are expressed as a function of how much warming would be caused by the same mass of  $CO_2$ . Thus, GHG emissions are typically measured in terms of pounds or tons of  $CO_2$  equivalent ( $CO_2E$ ).<sup>1</sup>

### **Impact Discussion**

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The proposed project would result in a temporary increase in localized GHG emissions during construction. Construction activities would include removing the existing turf from the field, regrading the field to provide appropriate slope and grading to create a drainage retention basin, trenching to install new stormdrain lines and remove existing stormdrain lines, removal of two existing light standards and two small sections of bleachers, and resurfacing or replacing asphalt pavement in an approximately 500 square foot area between the field and School Street. Construction is expected to occur between April and August 2020 and to involve the use of between three and six pieces of equipment operating for between four and seven hours each day.

The NSCAPCD has not identified a threshold of significance for GHG emissions; and the BAAQMD has not identified a threshold of significance specific to construction period emissions. Thus, the BAAQMD project operation threshold of 1,000 metric tons per year (MT/yr) of CO<sub>2</sub>E is relied upon in this analysis. Total emissions from the use of construction equipment would be expected to remain below 200 MT. This estimate is based on the emissions modeling that was prepared for the Healdsburg High School Track and Field Improvements project (Healdsburg Unified School District 2017), which shows that use of three pieces of equipment during the four-month site preparation and grading phase would generate 54.26 MT CO<sub>2</sub>E and that use of five pieces of equipment during the five-day paving phase would generate 2.99 MT CO<sub>2</sub>E. This data shows that the GHG emissions during construction activities for the Cloverdale High School Stadium project would remain substantially below the BAAQMD project operation threshold, and thus the project's emissions would not substantially contribute to regional or GHG emissions.

The project would not change the existing operation and use of the stadium and track. Thus, it would not create any new GHG emission sources or increase GHG emissions associated with operation. Therefore, the proposed project would have a **less-than-significant** impact associated with GHG emissions under both project construction and operation periods.

The  $CO_2E$  for a gas is derived by multiplying the mass of the gas by the associated GWP, such that metric tons of  $CO_2E$  = (metric tons of a GHG) × (GWP of the GHG). CalEEMod assumes that the GWP for  $CH_4$  is 25, which means that emissions of 1 metric ton of  $CH_4$  are equivalent to emissions of 25 metric tons of  $CO_2$ , and the GWP for  $CO_2$ 0 is 298, based on the Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report.

# b) Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Scoping Plan, approved by CARB on December 12, 2008 and last updated in 2016, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs (CARB 2018). In addition, Executive Order (EO) B-30-15 established a statewide goal of reducing GHG emissions to 40% below 1990 levels by 2030 and EO S-3-05 established a statewide goal of reducing GHG emissions to 80% below 1990 levels by 2050.

The Scoping Plan and both EOs are not directly applicable to specific projects. Instead, the Eos define emission reduction targets and the Scoping Plan identifies strategies and regulatory measures aimed at the identification and reduction of GHG emissions. Many of the Scoping Plan measures focus on area source emissions (e.g., energy usage, high GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard). Because the focus in the statewide policies and plans is on reducing GHG emissions in future years, and the proposed project would not change the existing operation and use of the stadium and track and thus would not create any new GHG emission sources or increase GHG emissions associated with operation, the project would have **no impact** associated with generating GHG emissions that could conflict with applicable plans and policies for GHG emission reductions.

### **Mitigation Measures**

No mitigation measures are required.

## 3.9 Hazards and Hazardous Materials

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX.	HAZARDS AND HAZARDOUS MATERIALS - Wou	ld 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?				

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Be located on a site that 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?				

### Setting

The analysis and mitigation measure in this section are based on the Phase I Environmental Site Assessment prepared by Dudek for the project site, which is provided in Appendix E. The project site was originally developed as a sports field in the 1950s, with additional improvements made to the property through 2015.

There are no known hazardous materials or other "recognized environmental conditions" within or adjacent to the project site that would affect implementation of the proposed project. The term "recognized environmental condition" means the presence or likely presence of any hazardous substances or petroleum products on the subject property under conditions that indicate an existing release, a past release, or a material threat of a future release into the ground, groundwater, or surface water.

Hazardous materials stored and used in the area surrounding the project site would likely be associated with common materials used in utility work, maintenance, vegetation care, residential uses, construction, and recreational activities, such as paints, cleaning solvents, bonding agents, and small quantity petroleum fuels and lubricants. No hazardous materials cleanup sites are located within the project site (Appendix E). The proposed project is not within a Very High Fire Hazard Severity Zone (Calfire 2019).

Jefferson Elementary School is within 900 feet of the project site. The Cloverdale Municipal Airport is located approximately 2.3 miles south of the project site. The site is not within the boundaries of an airport land use plan.

### **Impact Discussion**

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The project would not alter the existing operation and use of the stadium and track. The project would replace the existing turf field with synthetic turf, which would reduce the use of common hazardous materials associated with landscape maintenance. Following project construction, there would be no other change in the type and volume of hazardous materials routinely used at the site for property maintenance and operation of the high school's athletic program.

Construction activities would involve the use of common hazardous materials, including bonding agents, paints and sealants, and petroleum-based fuels, hydraulic fluids, and lubricants used in vehicles and equipment. Large quantities of these materials would not be stored at or transported to the construction site. All construction waste materials would be disposed of in compliance with state and federal hazardous waste requirements and at appropriate facilities. Construction would comply with the requirements for storage, spill prevention and response and reporting procedures, and by implementing spill prevention measures included in the SWPPP (see Sections 3.7 and 3.10 and Mitigation Measure GEO-1). Additionally, Mitigation Measure HAZ-1 requires specific measures for spill prevention and containment of hazardous materials on the project site during construction. With implementation of mitigation measures and requirements identified above, impacts associated with transport, use, or disposal of hazardous materials would be less than significant with mitigation incorporated.

b) Would the project 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?

The project proposes to rebuild and improve an existing track, replace the existing field with synthetic turf, construct drainage infrastructure, replace existing lights and remove two existing light standards, and repave a section of the access driveway between the field and School Street. There are four sites in the project vicinity known to be affected by past releases of hazardous materials. These include a portion of the Cloverdale High School campus approximately 450 feet north of the stadium where a leaking underground storage tank has been removed; a former gas station 413 feet east of the site where leaking underground storage tanks and contaminated soil has been removed; a former gas station 0.36 miles south/southeast of the site where leaking underground storage tanks have been removed and soil remediation is ongoing; and a former gas station 0.29 miles south/southeast of the site where leaking underground storage tanks were removed and groundwater remediation is ongoing. None of these sites appear to have impacted the project site.

Construction of the project would involve temporary use of hazardous materials, including fuel for construction equipment, paints, solvents, and sealants, as discussed in response a) above. Storage, handling, and use of these materials would occur in accordance with standard construction BMPs to minimize the potential for spill or release and ensure that any such spill or release would be controlled on site. Construction plans and specifications would include standard construction BMPs for handling, storage, use and disposal of hazardous materials, such as requirement to contain materials inside buildings or under other cover, vehicle specifications for hazardous material transport and disposal, procedures for safe storage, and training requirements for those handling hazardous materials. All hazardous materials would be in accordance to the requirements for storage, spill prevention and response and reporting procedures,

and the SWPPP. Additionally, Mitigation Measure HAZ-1 requires specific measures for spill prevention and containment of hazardous materials on the project site during construction. Compliance with standard construction specifications, the Hazardous Substances Plan, and Mitigation Measure HAZ-1 would ensure that impacts would be less than significant with mitigation incorporated.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The project site is located within the Cloverdale High School campus and within 900 feet of Jefferson Elementary School. Use of construction equipment would generate limited amounts of hazardous emissions as discussed in Section 3.3 but these emissions would be limited in quantity and would not create hazardous pollutant concentrations. Additionally, construction would occur between April and August 2020, thus the majority of emissions would occur when schools are not in session or are operating under a limited summer school program. The project would not change the existing use and operation of the track and stadium thus project operation would not introduce new hazardous emissions or hazardous material. Thus, the project would have a **less than significant impact**.

d) Would the project be located on a site that 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?

The project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, therefore, will have **no impact**.

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

The Cloverdale Municipal Airport is located approximately 2.3 miles south of the project site. The site is not within the boundaries of an airport land use plan. There are no public airports within the two miles of the project site and the site is not within an airport land use plan. Therefore, **no impact** would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

There are neither airports nor airstrips within two miles of the project site. Therefore, the project will have **no impact**.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The proposed project is within the City of Cloverdale within the County of Sonoma. The proposed project is located within an urbanized area and is not within a Very High Hazard Severity Zone as mapped by CAL FIRE (CAL FIRE 2008), however there is a Very High Fire Hazard Severity Zone within a State Responsibility Area designated adjacent to the western boundary of the City, approximately 0.3 miles from the project site (CAL FIRE 2007).

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not change the operation and use of the stadium and track compared to current conditions. Because there would be no change in operation and use, the project would not increase the risk of accidental ignition of a fire within or adjacent to the project site. Further, the project would not create new housing or new employment opportunities and would not increase the enrollment capacity of the high school so it would not result in additional population in the area that could be exposed to the wildland fire risks present in the region. The project would result in **no impact** from increasing the risk of exposure to wildfire.

### Mitigation Measure:

- **HAZ-1 Hazardous Materials Management.** The following measures shall be implemented prior to and during construction and shall be incorporated into project plans and specifications.
  - All equipment shall be inspected by the contractor for leaks prior to the start of construction and regularly throughout project construction. Leaks from any equipment shall be contained and the leak remedied before the equipment is again used on the site.
  - Best management practices for spill prevention shall be incorporated into project plans and specifications and shall contain measures for secondary containment and safe handling procedures.
  - A spill kit shall be maintained on site throughout all construction activities and shall contain appropriate items to absorb, contain, neutralize, or remove hazardous materials stored or used in large quantities during construction.
  - Project plans and specifications shall identify construction staging areas and designated areas where
    equipment refueling, lubrication, and maintenance may occur. Areas designated for refueling,
    lubrication, and maintenance of equipment shall be approved by the City.
  - In the event of any spill or release of any chemical or wastewater during construction, the contractor shall immediately notify the City.
  - Hazardous substances shall be handled in accordance with Title 22 of the California Code of Regulations, which prescribes measures to appropriately manage hazardous substances, including requirements for storage, spill prevention and response and reporting procedures

# 3.10 Hydrology and Water Quality

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X.	HYDROLOGY AND WATER QUALITY - Would the	project:			
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		$\boxtimes$		
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				$\boxtimes$
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:				
	<ul> <li>result in substantial erosion or siltation on or off site;</li> </ul>				
	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; or				
	iv) impede or redirect flood flows?				$\boxtimes$
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?				

### Setting

Runoff from the project site flows into existing stormdrains, swales, and ditches, which convey water to the existing drainage feature along the eastern site boundary and into the creek along the southern site boundary. The proposed project would be required to prepare and implement a SWPPP because the project site is larger than one acre. The Flood Insurance Rate Maps issued by the Federal Emergency Management Agency (FEMA) indicate that the project site is located within flood Zone X (FEMA 2019). Zone X is considered an area of minimal flood hazard.

### **Impact Discussion**

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The proposed project would reconstruct the existing Cloverdale High School track, replace the existing stadium field with synthetic turf, provide drainage improvements, replace existing lighting with LED fixtures and remove two existing light standards, and repave a section of the access driveway between the field and School Street. The project would not change the existing operation and use of the stadium and track.

As discussed in Section 3.7 Geology and Soils, SWPPP would be prepared as required by Mitigation Measure GEO-1 that would ensure that appropriate measures are implemented to control erosion and protect water quality during and following construction. The project includes installation of subdrains and storm drain lines to collect runoff from throughout the project site, construction of a retention pond in the southeast corner of the site, and installation of additional storm drain lines from the retention pond to several points of discharge into the creek at the southern boundary of the site. The storm drain inlets would include filtration devices to protect water quality.

Implementation of Mitigation Measure GEO-1 (SWPPP) and Mitigation Measure HAZ-1 (spill prevention measures) would ensure that project impacts associated with degradation of water quality would be **less** than significant with mitigation incorporated.

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

The proposed project would include the construction of a new all-weather track and synthetic turf field in place of an existing grass field and dirt track. This would increase the extent of impervious surfaces at the project site, which could reduce the potential for groundwater recharge in the area. However, all drainage from the project site would be conveyed to the retention pond proposed to be created at the southeast corner of the site, and water from the retention pond would be conveyed to the creek south of the site. Thus while the project would increase impervious surfaces within the project site, all drainage would be conveyed to areas where groundwater recharge potential remains. The proposed project would not require the use of groundwater. The project would result in **no impact** associated with depletion of groundwater supply or recharge.

- c) Would the project 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; or
  - iv) impede or redirect flood flows?

The proposed project would result in minor temporary changes in site hydrology resulting from construction disturbance such as excavation, equipment use, and vegetation removal. As discussed in Section 3.7: Geology and Soils, construction may result in erosion of top soil and increased sedimentation. Implementation of Mitigation Measure GEO-1 (SWPPP) would ensure that erosion is minimized during construction. As discussed above, the project would alter drainage patterns through the project site by increasing impervious surfaces at the site, but all drainage would be conveyed to the proposed retention pond and the creek south of the site. All storm drain inlets would include filtration devices to protect water quality. The retention pond would provide for additional filtration of stormwater runoff as well as slowing the rate at which water discharges to the creek such that the project would result in no change in on or offsite flooding or create or contribute runoff that would exceed the capacity of stormwater drainage systems. As discussed in Section 3.9, Hazards and Hazardous Materials, construction of the project would involve temporary use of common hazardous materials used for construction purposes. However, implementation of Mitigation Measure GEO-1 and appropriate materials handling and spill prevention measures required by Mitigation Measure HAZ-1 would ensure that water quality would not be degraded by materials used during construction or inadvertent release of those materials. Thus, the project impacts associated with drainage patterns and associated erosion, flood risks, and water quality would be less than significant with mitigation incorporated.

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

As discussed in the Setting section above, the proposed project is not located within a flood hazard, tsunami, or seiche zone, and the project site is not expected to be inundated. Therefore, the proposed project would have **no impact**.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As presented in discussions a, b, and c above, the proposed project would not conflict or obstruct the implementation of a water quality control plan or groundwater management plan. The proposed project would have no impact on groundwater and would therefore have no impact on a groundwater management plan. The proposed project would be consistent with applicable water quality control plans. Therefore, the proposed project would have **no impact**.

### **Mitigation Measures**

Implementation of Mitigation Measures GEO-1 as presented in Section 3.7 and HAZ-1 as presented in Section 3.9 would ensure that impacts related to hydrology and water quality would be reduced to less-than-significant levels. No additional mitigation measures are required.

## 3.11 Land Use and Planning

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	LAND USE AND PLANNING - Would the project:				
a)	Physically divide an established community?				$\boxtimes$
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?				

### Setting

The project site is located within Sonoma County, just east of the City limits of Cloverdale, California. It is designated Public-Institutional and zoned Public. The proposed project would not require a zoning or land use change and would continue existing allowed uses on site.

### **Impact Discussion**

#### a) Would the project physically divide an established community?

The project proposes to rebuild and improve an existing track, replace the existing field with synthetic turf, construct drainage infrastructure, replace existing lights and remove two existing light standards, and repave a section of the access driveway between the field and School Street. All construction would occur within or immediately adjacent to the existing Cloverdale High School track and stadium area and none of the project elements would physically divide an established community. Therefore, the proposed project would have **no impact**.

# b) Would the project 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?

The project proposes to rebuild and improve an existing track, replace the existing field with synthetic turf, construct drainage infrastructure, replace existing lights and remove two existing light standards, and repave a section of the access driveway between the field and School Street. No tree removal is proposed.

The proposed project would be consistent with the current zoning of the project site. The project would continue the existing allowed uses of the site and would comply with the General Plan land use designation and the City's Zoning Ordinance. Therefore, the proposed project would have **no impact**.

### **Mitigation Measures**

No mitigation measures are required.

### 3.12 Mineral Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact	
XII.	XII. MINERAL RESOURCES – Would the project:					
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?					
b)	Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?					

### Setting

The Cloverdale General Plan does not identify any mineral resources or mineral extraction operations within the city limits. No mineral resources are known to exist within the project site or in the project vicinity.

### **Impact Discussion**

a) Would the project 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?

The project site is designated as Public-Institutional and the school has been onsite since the 1950s (Appendix E). There are no known mineral resources within the project site, and it is unlikely that undiscovered mineral resources are present. Therefore, there would be **no impact** 

b) Would the project 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?

The project site is designated Public-Institutional by the General Plan and has been used as high school and track. No mineral recovery activities have been known to occur on site. Thus, the proposed project would have **no impact**.

### Mitigation Measures

No mitigation measures are required.

### 3.13 Noise

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Wo	uld the project result in:				
permanent in the vicinity of standards es plan or noise	of a substantial temporary or increase in ambient noise levels in a the project in excess of stablished in the local general erordinance, or applicable other agencies?				
	of excessive groundborne groundborne noise levels?				
private airst or, where su adopted, wir airport or pu project expo	t located within the vicinity of a rip or an airport land use plan uch a plan has not been thin two miles of a public ublic use airport, would the use people residing or working ot area to excessive noise				

### Setting

The project site is the existing Cloverdale High School stadium and track. The residential, public library, and church land uses adjacent to the site are considered noise-sensitive receptors. Existing noise sources in the area are typical of residential areas and include vehicle operation, landscaping equipment, construction activities and other sources typical of residential settings. The existing use and operation of the stadium and track also generate intermittent noise and contribute to the existing noise setting of the project vicinity.

The City of Cloverdale does not have a specific noise ordinance but the General Plan Noise Element identifies that an area with a day/night average noise level ( $L_{dn}$ ) below 60 decibels (dB) is acceptable and  $L_{dn}$  between 60 and 70 dB as conditionally acceptable for residences, libraries, churches, and schools (Cloverdale 2010). It is common for city and county codes to exempt temporary construction noise from identified noise standards that apply to non-construction activities.

### **Impact Discussion**

a) Would the project 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?

The project would not alter the existing operation and use of the stadium and track and there would be no change in the type, frequency, and noise level from periodic noise generation that occurs in association with sporting events and other events held at the site.

The proposed project would result in a temporary increase in ambient noise levels in the immediate vicinity of the active construction area during construction of the proposed project. Project construction is expected to last approximately five months. Construction equipment that would be used at the site typically generates noise levels ranging from 73 to 85 dB at a distance of 50 feet from the equipment, as shown in Table 3-1 below. These noise levels are expressed as A-weighted dBs (dBA), while the City's acceptable and conditionally acceptable noise levels are defined in terms of the Community Noise Equivalent Level  $L_{dn}$ . As the use of specific pieces of construction equipment varies throughout the day, the noise levels will also vary. Thus it is not possible to directly compare the dBA given in Table 3-1 directly to the City's acceptable  $L_{dn}$  level; however it is useful to consider the City's  $L_{dn}$  levels as a point of reference.

Table 3-1
Typical Construction Equipment Noise Emissions Levels and Usage Factors

Equipment Description	Impact Device?	Acoustical Use Factor (%)	Spec 721.560 L <sub>max</sub> @ 50ft (dBA, slow)	Actual Measured L <sub>ma</sub> x @50ft (dBA, slow) samples averaged
Backhoe	No	40	80	78
Compressor (air)	No	40	80	78
Concrete Pump Truck	No	20	82	81
Crane	No	16	85	81
Dozer	No	40	85	82
Dump Truck	No	40	84	76
Flat Bed Truck	No	40	84	74
Front End Loader	No	40	80	79
Generator	No	50	82	81
Generator (<25KVA, VMS signs)	No	50	70	73
Man Lift	No	20	85	75
Pickup Truck	No	40	55	75
Pneumatic Tools	No	50	85	85
Pumps	No	50	77	81
Roller	No	20	85	80
Scraper	No	40	85	84
Tractor	No	40	84	N/A
Welder / Torch	No	40	73	74

Source: DOT 2006

Residents and visitors to properties adjacent to the project site would be exposed to periodic noise levels that would exceed 70 dB. While Cloverdale does not have a noise ordinance specifying noise standards for construction or other activities, the City does have a practice of including conditions of approval for discretionary projects to limit noise impacts by restricting days and hours when noise-generating construction activities can occur. Mitigation Measure NOISE-1 limits the days and times when noise-generating construction activities may occur and identifies other noise-reducing measures to be applied during construction to ensure that noise levels are minimized to the extent feasible. Thus impacts from project construction would be **less than significant with mitigation incorporated**.

### b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

The project would not alter the existing operation and use of the stadium and track and the long-term potential for incidental groundborne vibration and noise to occur in association with sporting events and other events that may be held at the site.

Some increased groundborne vibration and noise may occur during the approximately five-month construction period. None of the types of construction activities that typically generate noticeable groundborne vibrations, such as substantial excavation and pile driving, would occur. Construction activities would include removal of vegetation and limited amounts of existing paving, grading, trenching, and installation of the new track and field surfaces. Ground vibration from these construction activities do not reach levels that can damage structures or adversely affect activities typical to the surrounding land uses, although some vibrations may be felt by nearby persons in close proximity and could result in annoyance.

On-site construction equipment that would cause the most ground-borne vibration and noise would be associated with soil compaction, placement of the subgrade layers of the track and field surfaces, and pavement work. However, the noise would be temporary and only occur during daytime hours, in accordance with Mitigation Measure NOISE-1. Thus, construction would not result in adverse effects due to groundborne vibration and noise and the impact would remain less than significant with mitigation incorporated.

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?

The Cloverdale Municipal Airport is located approximately 2.3 miles south of the project site. The site is not within the boundaries of an airport land use plan. The project would not change the operation or use of the stadium and track and there would be no change in conditions associated with aircraft noise levels. The proposed project would have **no impact**.

### Mitigation Measures

**NOISE-1:** Noise Control. CUSD and its construction contractors shall implement the following practices to limit noise exposure adjacent to the project site:

1. Noise-generating construction activities shall be limited to Monday through Friday between the hours of 7am to 7pm and Saturdays between the hours of 7 am and 4 pm.

- 2. No construction shall occur on federal holidays.
- 3. At least two weeks prior to the start of construction, information regarding the construction schedule and a CUSD contact person shall be posted at the CUSD website, available at the CUSD district office, provided to adjacent property owners by U.S. mail and/or e-mail, and posted at the School Street driveway that access the stadium site.
- 4. All internal combustion construction equipment shall be equipped with mufflers in working order.
- 5. All stationary equipment shall be located as far as feasible from adjacent residences.

## 3.14 Population and Housing

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV	. POPULATION AND HOUSING - Would the project	et:			
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?				

#### Setting

The project site is located in the City of Cloverdale and is generally surrounded by residential development. Land use and development in the area served by the CUSD is guided by the Cloverdale General Plan.

### **Impact Discussion**

a) Would the project 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)?

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. The proposed project does not propose the construction of housing. The project would not change the existing operation or use of the stadium and track and thus would not generate any new employment opportunities. The project would have **no impact** because it would not result in any unplanned population growth either directly or indirectly.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. The proposed project does not involve demolition of any residential structures and would not displace populations or housing. Therefore, the proposed project would have **no impact**.

### **Mitigation Measures**

No mitigation measures are required.

### 3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact		
XV. PUBLIC SERVICES						
physically altered governmental facilities, neconstruction of which could cause significant	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?				$\boxtimes$		
Schools?				$\boxtimes$		
Parks?				$\boxtimes$		
Other public facilities?				$\boxtimes$		

### Setting

**Fire Protection**: Fire protection services are provided to the project site by the Cloverdale Fire Department. The closest fire station is located at 451 S Cloverdale Blvd, Cloverdale, CA 95425, about 3,500 feet south of the project.

**Police Protection**: Police protection services are provided to the project site by the Cloverdale Police Department substation about 1,420 feet from the project on Broad Street. The Cloverdale Police Department is split into four divisions and serves as the call center for the city 24 hours per day, 7 days per week.

Parks: Cloverdale City Park located approximately 1,750 feet south of the project site.

**Libraries**: The Cloverdale Regional Library, operated by the City of Cloverdale, is located adjacent to the project site at 401 N Cloverdale Blvd, Cloverdale, CA 95425.

### **Impact Discussion**

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, including fire protection, police protection, schools, parks, and other public facilities?

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not change the operation and use of the stadium and track in comparison to current conditions. The project would not create new housing or new employment opportunities and would not increase the enrollment capacity of the high school. All improvements and construction would be confined to areas within the existing boundaries of project site and no new structures would be created. The project would not result in additional population in the area and thus would require no new or expanded facilities to support adequate fire or police protection, schools, parks or other public facilities; therefore, the project would result in **no impact** from physical impacts associated with providing new or modified facilities.

### Mitigation Measures

No mitigation measures are required.

## 3.16 Recreation

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI	. RECREATION				
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				

#### Setting

Cloverdale City Park located approximately 1,750 feet south of the project site. The project site does not contain a park, is not adjacent to a park, nor does it provide access to a park or recreational facilities or areas but it does contain and track and field for use by the Cloverdale High School.

### **Impact Discussion**

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

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. The project would not create new housing or new employment opportunities and would not increase the enrollment capacity of the high school. No neighborhood or regional parks existing on or adjacent to the project site. No other recreational facilities are located within or on the project site, nor does the project site provide or plan to remove access to recreational facilities. The project would have **no impact** because it not result in an increased population and therefore, would not have an increased demand on recreational facilities.

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

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. It have **no impact** because it would not result in an increased population that would require the construction of new, or the expansion of existing, recreational facilities and therefore, would not have an increased demand on recreational facilities.

### **Mitigation Measures**

No mitigation measures are required.

## 3.17 Transportation

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

### Setting

Access to the project site is achieved via School Street. The local roadways that would be utilized during project construction and operation are School Street, North Washington Street and North Cloverdale Boulevard, which are publicly accessible City of Cloverdale roadways. The City of Cloverdale is accessed via SR 128 to the east.

### **Impact Discussion**

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. The proposed project would not alter roadways nor would it add any population that would impact roadway service levels or transit, bicycle, and pedestrian facilities. Implementation of the proposed project would not increase the number of trips per day to and from the project site, as it would not result in an increase in staffing or enrollment of the school. Therefore, the proposed project would have **no impact** associated with conflicts with a program, plan, ordinance, or policy addressing the circulation system and creating any significant traffic impacts in terms of levels of service.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. Thus the project would have **no impact** because it would not result in any changes in vehicle miles traveled nor would it involve the construction of a transportation project.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. The project would have **no impact** related to traffic safety because it would not alter any public or private roadways and would not introduce any new traffic or vehicles to the project area.

d) Would the project result in inadequate emergency access?

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. The project would have **no impact** related to emergency access because it would not alter any public or private roadways and would not introduce any new traffic or vehicles to the project area.

### **Mitigation Measures**

No mitigation measures are required.

### 3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?				

#### Setting

The information in this section is taken from the Cultural Resources Evaluation that Dudek completed for the project site, which is included in Appendix E. The NAHC was contacted by Dudek on July 17, 2019 to request a search of the Sacred Lands File for all land within one mile of the project site. The NAHC responded on August 12, 2019 indicating that the search had identified Native American resources in the search area. Dudek archeologists attempted to contact NAHC-listed Tribal representatives by letter and phone. Representatives from the Graton Rancheria Tribe of Federated Indians (Graton Rancheria) responded, observing that the APE does not fall in this tribe's traditional ancestral territory. The Mishewal-Wappo Tribe of Alexander Valley was identified by the NAHC as the group to be specifically contacted for additional information relating to the NAHC SLF search results, no response to Dudek outreach attempts (outside of Graton Rancheria) has been received by this tribe or others on the NAHC Contact list.

### **Impact Discussion**

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

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

No tribal cultural resources were identified as a result of consultation conducted in accordance with AB 52. A search of NAHC's Sacred Lands File and a CHRIS records search identified no previously recorded cultural resources of Native American origin within the project site or a surrounding quarter-mile area. However, unanticipated discoveries of tribal cultural resources may occur during construction activities. Mitigation Measures CUL-1 and CUL-2 would protect tribal cultural resources in the event of discovery. Therefore, the project would have a less than significant impact with mitigation incorporated.

### Mitigation Measures

Implementation of Mitigation Measures CUL-1 and CUL-2 as presented in Section 3.5 would ensure that potential impacts related to tribal cultural resources would be reduced to less-than-significant levels. No additional mitigation measures are required.

## 3.19 Utilities and Service Systems

M		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	LUTILITIES AND SERVICE SYSTEMS – Would the Require or result in the relocation or	project:			
a)	construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				
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?				

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				

### Setting

The project site supports the existing Cloverdale High School Stadium track and field, including a concessions stand with restrooms and a kitchen. Water and sewer service for the restrooms and kitchen associated with the stadium are provided by the City of Cloverdale. Runoff from the project site flows into existing stormdrains and ditches, which convey water to the existing drainage feature along the eastern site boundary and into the creek along the southern site boundary. Solid waste collection, transportation, and disposal is provided by Recology, which is responsible for ensuring that solid waste disposal services meet state and federal mandates for integrated waste management.

### **Impact Discussion**

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

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. The project would not create new housing or new employment opportunities and would not increase the enrollment capacity of the high school. The project would not result in additional population in the area and thus would require no new or expanded facilities to support adequate water service, wastewater treatment, electric power, natural gas, or telecommunications facilities.

As discussed in Section 3.10, Hydrology and Water Quality, the project would result in an increase in impervious surfaces at the project site by replacing the dirt track with an all-weather surface and replacing the sod field with artificial turf. The project includes installation of subdrains and storm drain lines to collect runoff from throughout the project site, construction of a retention pond in the southeast corner of the site, and installation of additional storm drain lines from the retention pond to several points of discharge into the creek at the southern boundary of the site. The storm drain inlets would include filtration devices to protect water quality. The retention pond would provide for additional filtration of stormwater runoff as well as slowing the rate at which water discharges to the creek such that the project would result in no change in on or off-site flooding or create or contribute runoff that would exceed the capacity of stormwater drainage systems. The project would not require any additional construction of or improvement to storm water drainage facilities.

Thus, the project would have **no impact** because it would not require relocation or construction of new utility service infrastructure.

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

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. The project would not create new housing or new employment opportunities and would not increase the enrollment capacity of the high school. The project have **no impact** because it would not result in any increase in demand for water supply.

c) Would the project 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?

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. The project would not create new housing or new employment opportunities and would not increase the enrollment capacity of the high school. The project have **no impact** because it would not result in any increase in demand for wastewater treatment.

d) Would the project 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?

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. The project would have **no impact** because it would not result in any increase in generation of solid waste.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not alter the existing operation and use of the stadium and track. The project would have **no impact** because it would not result in any increase in generation of solid waste.

#### **Mitigation Measures**

No mitigation measures are required.

### 3.20 Wildfire

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX.	<b>WILDFIRE</b> – If located in or near state responsible zones, would the project:	oility areas or land	ds classified as ver	y high fire hazard	d severity
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?				

### Setting

The project site is characterized developed and ornamental planting land cover, is relatively flat, and is surrounded by residential and public/institutional land uses. The project site is not located within a Very High Fire Hazard Severity Zone as mapped by CAL FIRE, however CAL FIRE has recommended to the City of Cloverdale that two areas within the westernmost portion of the City be designated as within the Very High Fire Hazard Severity Zone under a Local Responsibility Area (CAL FIRE 2008). The nearest of these to the project site is located approximately 0.3 mile west of the site, at the western terminus of School Street. The foothills adjacent to the western city limits are within a State Responsibility Area and are designated as a Very High Fire Hazard Severity Zone (CAL FIRE 2007).

### **Impact Discussion**

### a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not change the operation and use of the stadium and track compared to current conditions. The project would not increase traffic in the project area that could impede emergency response and does not include

any structures or features that would physically interfere with implementation of emergency response or evacuation plans. The project would rely on an existing driveway for access and would not alter any public streets. The project would not create new housing or new employment opportunities and would not increase the enrollment capacity of the high school and thus would not increase the population in the City, so it would not have any indirect effects associated with impairing implementation of emergency response or evacuation plans. Therefore, the proposed project would have **no impact**.

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

The proposed project would modify the existing stadium and track at the Cloverdale High School but would not change the operation and use of the stadium and track compared to current conditions. Because there would be no change in operation and use, the project would not increase the risk of accidental ignition of a fire within or adjacent to the project site. Further, the project would not create new housing or new employment opportunities and would not increase the enrollment capacity of the high school so it would not result in additional population in the area that could be exposed to the wildland fire risks present in the region. The project would result in **no impact** associated with exacerbating wildfire risks or the potential for people to be exposed to pollutant concentrations or uncontrolled spread of wildfire.

c) Would the project 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?

The project would modify the existing stadium and track at the Cloverdale High School but would not change the operation and use of the stadium and track compared to current conditions. The proposed project would rely on an existing driveway for access and would not require the installation or maintenance of a road, fuel break, emergency water source, or utilities. Implementation of the proposed project would not increase fire risk. Therefore, the proposed project would have **no impact**.

d) Would the project 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?

The project site is relatively flat and the project includes subdrains and storm drain infrastructure sufficient to receive stormwater drainage from the site. Because the site is flat and does not support highly combustible vegetation, it would not be susceptible to post-fire slope instability or drainage changes. Further, the site is not proximate to any hillsides or other features where post-fire slope instability or drainage changes could lead to adverse effects within the project site. Therefore, the proposed project would have **no impact.** 

### Mitigation Measures

No mitigation measures are required.

## 3.21 Mandatory Findings of Significance

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI	. MANDATORY FINDINGS OF SIGNIFICANCE				
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
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 will cause substantial adverse effects on human beings, either directly or indirectly?		$\boxtimes$		

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 selfsustaining 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?

As evaluated in this Initial Study, the project has the potential to adversely affect wetlands, waters of the US, waters of the State, nesting birds, and any cultural resources that may be present below ground surface within the areas proposed for grading and trenching. Mitigation measures to avoid, minimize, or compensate for potential impacts identified are included in Section 3.4 Biological Resources, Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources. Thus, the project's effects would result in a less-than-significant impact with mitigation incorporated.

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

The project requires no change in land use or zoning designations and would not alter the operation and use of the stadium and track. All of the project's potential impacts would be temporary, occurring only during project construction, and limited in scope. Thus, the impacts of the proposed project would not be cumulatively considerable when considered with other projects throughout the region and the project would have **no impact**.

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

As evaluated throughout Initial Study, the project could result in adverse effects on human beings as a result of potential to cause soil erosion, decreases in water quality, and release of hazardous materials during construction. Mitigation measures to avoid or minimize these impacts identified are included in Section 3.7 Geology and Soils Section 3.9, Hazards and Hazardous Materials. With implementation of the mitigation measures identified in these sections, the project's effects associated with creating adverse effects on human beings would be a **less than significant impact with mitigation incorporated**.

# 4 References and Preparers

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## 4.2 List of Preparers

Katherine Waugh, AICP, Dudek Senior Project Manager

Kimberly Asbury, Dudek CEQA Analyst

Adam Giacinto, Dudek Senior Archeologist

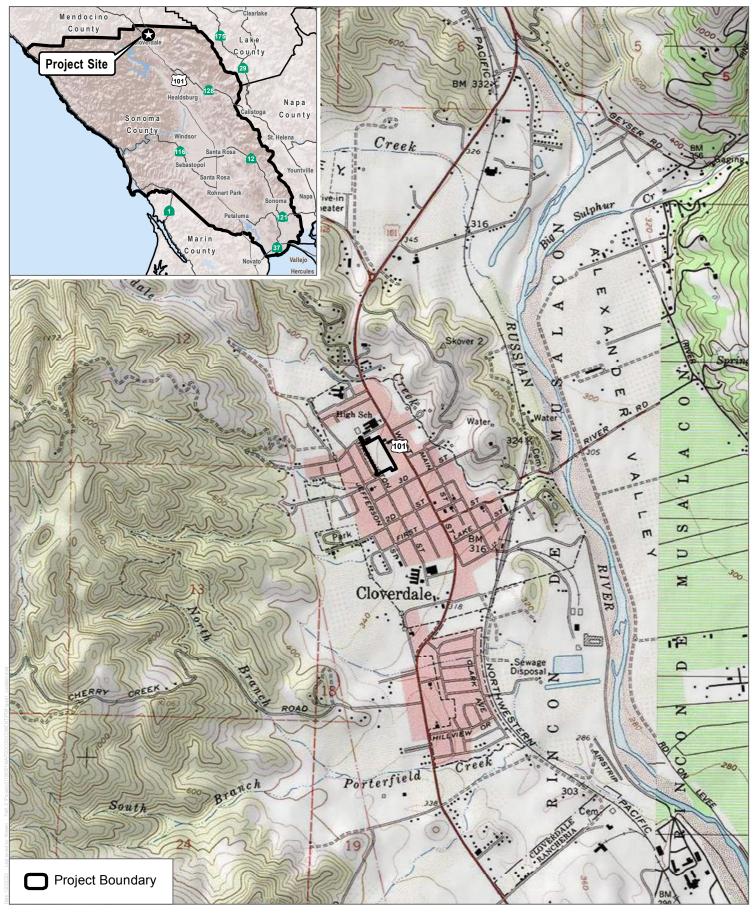
Ross Owen, Dudek Archeologist

Mike Henry, Dudek Senior Biologist

Allie Sennet, Dudek Biologist

Glenna McMahon, PE, Dudek Principal Engineer

Audrey Herschberger, PE, Dudek Environmental Engineer



SOURCE: USGS 7.5 Minute Series Cloverdale Quadrangle

**DUDEK** 

Project Location

FIGURE 1

CLOVERDALE HIGH SCHOOL STADIUM PROJECT

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SOURCE: ESRI 2018

**DUDEK 6** 0 75 150 Fee

FIGURE 2 Site Plan CLOVERDALE HIGH SCHOOL STADIUM PROJECT



Photo 1: View to north across the field.

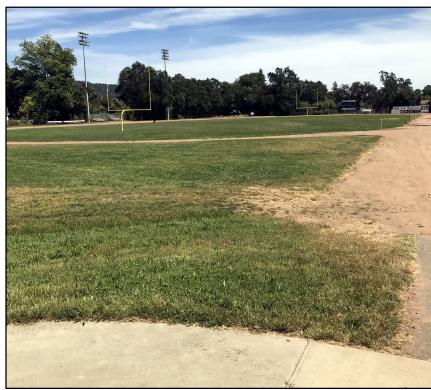


Photo 2: View to south across the field.



Photo 4: Ticket office and field entrance.



Photo 3: Northern portion of field.



Photo 5: Western portion of stadium.

CLOVERDALE HIGH SCHOOL STADIUM PROJECT



SOURCE: ESRI 2020

FIGURE 4 **Biological Resources**  CLOVERDALE HIGH SCHOOL STADIUM PROJECT

# Appendix A

Mitigation Monitoring and Reporting Program

## APPENDIX A Draft Mitigation Monitoring and Reporting Program

### DRAFT CLOVERDALE HIGH SCHOOL STADIUM PROJECT MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that when a lead agency adopts a Mitigated Negative Declaration (MND), it must also adopt a mitigation monitoring and reporting program (MMRP) for all required mitigation measures (CEQA Guidelines Section 15097). This MMRP identifies the monitoring program for mitigation measures identified by the IS/MND to reduce or avoid impacts associated with implementing the proposed Cloverdale High School Stadium Project. The MMRP shall be maintained by the Cloverdale Unified School District (CUSD).

Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
BIO-1	Nesting Bird Survey and Avoidance. A qualified biologist shall conduct a survey for nesting birds approximately two days prior to vegetation removal or ground-disturbing activities during the nesting season (March through August). The survey shall cover the limits of construction and suitable nesting habitat within 500 feet for raptors and 100 feet for other nesting birds, as feasible.  If any active nests are observed during surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest. The buffer distance will typically range from 50 to 300 feet and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.	CUSD and contractors	CUSD	Before construction - survey conducted     Throughout construction - protective measures for active nests	Survey completed no more than 2 prior to vegetation removal and/or ground disturbance     Limits of disturbance flagged prior to construction if nesting activities observed     Buffers implemented during nesting



Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
BIO-2	Avoided Habitat Fencing and Best Management Practice Installation. Prior to the initiation of ground disturbance activities, the limits of disturbance shall be fenced and sediment and erosion control measures shall be utilized, which could include, but not be limited to: biodegradable straw wattles free of weed seeds, silt fencing, or biodegradable erosion control mats/blankets. No construction, staging, or other ground disturbance activities shall be permitted beyond the fencing.	CUSD and contractors	CUSD	Before construction - limits of disturbance flagged and erosion control measures deployed     Throughout construction - flagging and erosion control measures maintained	Flagging and erosion control measures installed and maintained
BIO-3	Mitigation for Riparian Vegetation Impacts. If riparian vegetation removal and/or disturbance to the bed, bank, or channel of the intermittent drainage is necessary for project implementation, a Streambed Alteration Agreement (SAA), pursuant to Section 1602 of the California Fish and Game Code, shall be procured from the California Department of Fish and Wildlife (CDFW) prior to any disturbances to these areas. As part of the SAA, compensatory mitigation may be required to offset the loss of riparian habitat. If so, a mitigation plan shall be drafted by a qualified biologist to address implementation and monitoring requirements under the SAA to ensure that the project would result in no net loss of habitat functions and values. The plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, performance criteria, monitoring methods, and actions to be taken in the event that the mitigation is not successful. The plan shall be approved by the District and CDFW and any required compensatory mitigation shall take place either onsite or at an appropriate off-site location as approved by the CDFW and the District at a ratio directed by the SAA.  Regardless of the requirements of the SAA, if riparian vegetation removal is necessary, a qualified botanist shall conduct a preconstruction survey to identify and quantify the number of plants that could be potentially removed or disturbed. The botanist shall prepare a propagation and planting plan to offset the loss of any vegetation/plants to be removed or disturbed at a 1:1 ratio to	CUSD and contractors	CUSD	Before construction - SAA obtained, vegetation survey completed, replacement planting plan prepared     After construction – replacement planting plan implemented	<ul> <li>Receipt and implementation of a SAA prior to disturbance of riparian vegetation areas</li> <li>Replacement planting implemented to ensure no reduction in the extent of riparian vegetation community</li> </ul>



		Implementation	Monitoring		Performance
Number	ensure no net loss of the riparian vegetation community. The plan shall contain, at a minimum the following components: goals and objectives; a description of the extent of plants/vegetation to be removed or disturbed; plant collection, propagation, and planting methods; locations on the project site in which the plants will be transplanted; monitoring methods, timing, and performance criteria; measures to be taken in the event that the propagation and planting is not successful; and reporting requirements. The plan shall be approved by the District.	Responsibility	Responsibility	Mitigation Timing	Evaluation Criteria
BIO-4	Restoration of Temporary Vegetation Impacts. Natural land cover types temporarily impacted by project construction shall be restored with appropriate native vegetation. Areas to be restored shall be identified by a qualified biologist as being able to feasibly support the proposed native revegetation. Feasibility of native revegetation is primarily based on suitable soils, slopes, and aspect, as well as the presence of similar native vegetation adjacent to the proposed mitigation areas. The project proponent shall be responsible for developing and implementing a conceptual restoration plan for the temporarily impacted areas. The plan shall, at a minimum, include an implementation schedule, planting/seeding plan, invasive species eradication methods, interim and final success criteria/performance standards, estimated costs, and identification of responsible entities. The conceptual restoration plan shall be approved by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board prior to construction of the proposed project.	CUSD and contractors	CUSD	<ul> <li>Before construction – replacement planting plan prepared</li> <li>Immediately following project construction – replacement planting plan implemented</li> </ul>	Preparation and implementation of a conceptual restoration plan
BIO-5	Aquatic Resource Impact Permitting and Compensation. If any wetlands or other waters of the U.S. in the project site shall be directly impacted by the placement of fill material, the District shall obtain an individual or nationwide permit from the Army Corps of Engineers (ACOE) prior to such activity. As part of the ACOE permit, compensatory mitigation may be required, at a ratio to be determined by the ACOE, to offset	CUSD and contractors	CUSD	<ul> <li>Before construction – regulatory permits obtained including approval of compensatory mitigation plan</li> </ul>	Regulatory permits authorizing disturbance to aquatic resources obtained prior to construction



Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
	the loss of wetland/waters habitat. If so, and as part of the permit application process, a qualified biologist shall draft a mitigation and monitoring plan to address implementation and monitoring requirements under the permit to ensure that the project would result in no net loss of habitat functions and values. The plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, monitoring methods and performance criteria, extent of monitoring to be conducted, actions to be taken in the event that the mitigation is not successful, and reporting requirements. The plan shall be approved by ACOE and compensatory mitigation shall take place either on site or at an appropriate off-site location as approved by the ACOE.  Concurrent with the ACOE permit, the District shall also obtain a Water Quality Certification from the RWQCB, subject to the same mitigation plan requirements stated above. Any work within the bed or bank of the intermittent drainage, ditch 4, or within the abutting riparian woodland, would require authorization from CDFW under a California Fish and Game Code Section 1600 Streambed Alteration Agreement. Trimming or removal of riparian vegetation may also require compensatory mitigation, as directed by MM BIO-3 and BIO-4.			During construction - permit conditions implemented	Evaluation official
CUL-1	Unanticipated Cultural Resource Discovery. In the event that unanticipated discoveries of cultural resources are encountered during future project undertakings, all activity shall cease within 50 feet of the find until a qualified archaeologist can determine the significance of the find and appropriate mitigation. Examples of prehistoric resources may include: stone tools and manufacturing debris; milling equipment such as bedrock mortars, portable mortars, and pestles; darkened or stained soils (midden) that may contain dietary remains such as shell and bone; as well as human remains. Historic resources may include: burial plots; structural foundations; mining spoils piles and prospecting pits;	CUSD and contractors	CUSD	<ul> <li>Throughout construction activity</li> </ul>	<ul> <li>Any cultural resources discovered are evaluated and managed in accordance with state and federal standards</li> </ul>



Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
	cabin pads; and trash scatters consisting of cans with soldered seams or tops, bottles, cut (square) nails, and ceramics; paleontological resources.  In the event that unanticipated archaeological or paleontological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; PRC Section 21082) the archaeologist may record the find to appropriate standards (thereby addressing any data potential) and allow work to continue. If the archaeologist observes the discovery to be potentially significant under CEQA or Section 106 of the National Historic Preservation Act, additional efforts may be warranted as recommended by the qualified archaeologist				
CUL-2	Human Remains Discoveries. In accordance with Section 7050.5 of the California Health and Safety Code, if potential human remains are found, all work within 100 feet shall be suspended and the county coroner shall be immediately notified of the discovery. The coroner shall provide a determination within 48 hours of notification. No further excavation or disturbance of the identified material, or any area reasonably suspected to overlie additional remains, shall occur until a determination has been made. If the county coroner determines that the remains are, or are believed to be, Native American, they shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendent (MLD) from the deceased Native American. Within 48 hours of their notification, the MLD will recommend to the lead	CUSD and contractors	CUSD	Throughout construction activity	Any human remains discovered are evaluated and managed in accordance with state and federal standards



Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
	agency their preferred treatment of the remains and associated grave goods.				
GEO-1	Erosion Control. In order to reduce runoff and erosion and minimize the potential of sedimentation as a result of project construction and operation, the District shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) for all construction activities.	CUSD and contractors	CUSD	<ul> <li>Before construction – erosion control measures deployed</li> <li>Throughout construction – erosion control measures maintained</li> </ul>	<ul> <li>Preparation and implementation of a SWPPP</li> </ul>
HAZ-1	<ul> <li>Hazardous Materials Management. The following measures shall be implemented prior to and during construction and shall be incorporated into project plans and specifications.</li> <li>All equipment shall be inspected by the contractor for leaks prior to the start of construction and regularly throughout project construction. Leaks from any equipment shall be contained and the leak remedied before the equipment is again used on the site.</li> <li>Best management practices for spill prevention shall be incorporated into project plans and specifications and shall contain measures for secondary containment and safe handling procedures.</li> <li>A spill kit shall be maintained on site throughout all construction activities and shall contain appropriate items to absorb, contain, neutralize, or remove hazardous materials stored or used in large quantities during construction.</li> <li>Project plans and specifications shall identify construction staging areas and designated areas where equipment refueling, lubrication, and maintenance may occur. Areas designated for refueling, lubrication, and maintenance of equipment shall be approved by the City.</li> <li>In the event of any spill or release of any chemical or wastewater during construction, the contractor shall immediately notify the City.</li> </ul>	CUSD and contractors	CUSD	Before construction –     hazardous materials     containment     measures deployed     Throughout     construction –     hazardous materials     containment     measures maintained	Construction documents include hazardous materials containment measures Risks of hazardous materials releases are minimized All hazardous materials used during construction are removed from the site



Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
	<ul> <li>Hazardous substances shall be handled in accordance with Title 22 of the California Code of Regulations, which prescribes measures to appropriately manage hazardous substances, including requirements for storage, spill prevention and response and reporting procedures.</li> </ul>				
NOISE-1	<ol> <li>Noise Control. CUSD and its construction contractors shall implement the following practices to limit noise exposure adjacent to the project site:         <ol> <li>Noise-generating construction activities shall be limited to Monday through Friday between the hours of 7am to 7pm and Saturdays between the hours of 7 am and 4 pm.</li> <li>No construction shall occur on federal holidays.</li> <li>At least two weeks prior to the start of construction, information regarding the construction schedule and a CUSD contact person shall be posted at the CUSD website, available at the CUSD district office, provided to adjacent property owners by U.S. mail and/or e-mail, and posted at the School Street driveway that access the stadium site.</li> </ol> </li> <li>All internal combustion construction equipment shall be equipped with mufflers in working order.</li> <li>All stationary equipment shall be located as far as feasible from adjacent residences.</li> </ol>	CUSD and contractors	CUSD	Before construction – construction documents include noise control measures     Throughout construction – noise control measures implemented	<ul> <li>No construction noise between 7pm and 7am Monday through Friday or after 4 pm on Saturday</li> <li>Construction schedule and contact information posted and distributed</li> <li>Construction equipment maintained and placed as far from adjacent residences as feasible</li> </ul>



