



Proposed Recirculated Mitigated Negative Declaration

Publication Date: 07/20/2022
Public Review Period: 07/20/2022 – 08/20/2022
State Clearinghouse Number: **2020090529**
Permit Sonoma File Number: **UPE01-0181**
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Pursuant to Section 15071 of the State CEQA Guidelines, this proposed *Recirculated* Mitigated Negative Declaration and the attached Initial Study, including the identified mitigation measures and monitoring program, constitute the environmental review conducted by the County of Sonoma as lead agency for the proposed project described below:

Project Name:	UPE01-0181
Project Applicant/Operator:	Todd Road Partners
Project Location/Address:	304 Todd Road, Santa Rosa
APN:	134-171-050
General Plan Land Use Designation:	Limited Industrial (LI)
Zoning Designation:	Limited Rural Industrial District (M3) and Valley Oak Habitat Combining District (VOH)
Decision Making Body:	Board of Zoning Adjustments
Appeal Body:	Board of Supervisors
Project Description:	See item III, below

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” or “Less than Significant with Mitigation Incorporated” as indicated in the attached Initial Study and in the summary table below.

Table 1. Summary of Topic Areas

Topic Area	Abbreviation	Yes	No
Aesthetics	VIS		No
Agricultural & Forest Resources	AG		No
Air Quality	AIR	Yes	
Biological Resources	BIO	Yes	
Cultural Resources	CUL		No
Energy	ENE		No
Geology and Soils	GEO		No
Greenhouse Gas Emission	GHG		No
Hazards and Hazardous Materials	HAZ		No
Hydrology and Water Quality	HYDRO		No
Land Use and Planning	LU		No
Mineral Resources	MIN		No
Noise	NOISE	Yes	
Population and Housing	POP		No
Public Services	PS		No
Recreation	REC		No
Transportation	TRANS	Yes	
Tribal Cultural Resources	TCR		No
Utilities and Service Systems	UTL		No
Wildfire	WILD		No
Mandatory Findings of Significance			No

RESPONSIBLE AND TRUSTEE AGENCIES

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

Table 2. Jurisdictional Agencies

Agency	Activity	Authorization
State Water Resources Control Board	General Construction Permit	National Pollutant Discharge Elimination System (NPDES)

ENVIRONMENTAL FINDING:

Based on the evaluation in the attached Initial Study, I find that the project described above will not have a significant adverse impact on the environment, provided that the mitigation measures identified in the Initial Study are included as conditions of approval for the project, and a Mitigated Negative Declaration is proposed. The applicant has agreed in writing to incorporate identified mitigation measure into the project plans.



2022-07-19

Name: Adam Sharron – Project Planner, Permit Sonoma



County of Sonoma
Permit & Resource Management Department

Initial Study

I. INTRODUCTION:

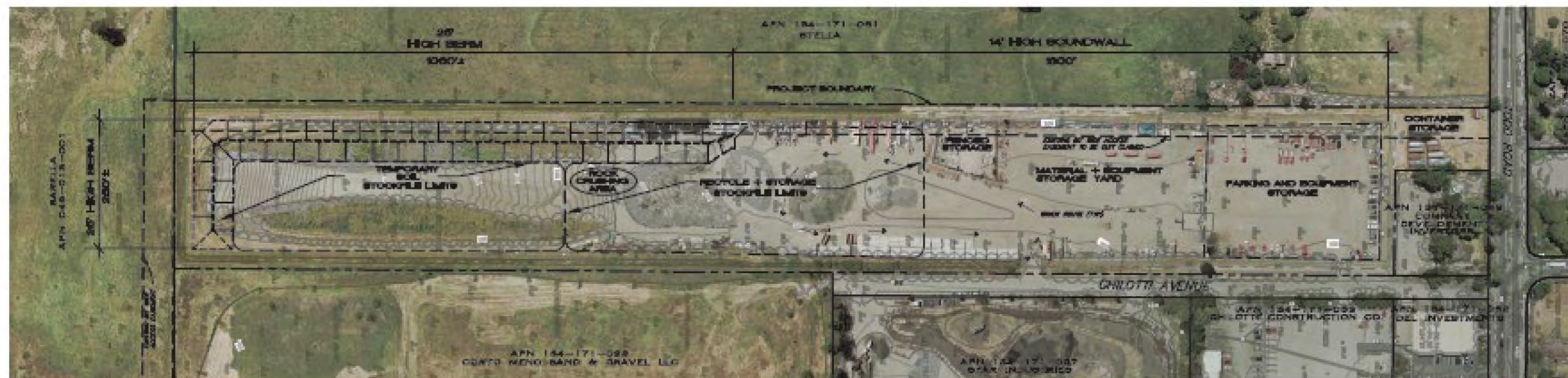
The project applicant, Ghilotti Construction Company, Inc., is applying for a Use Permit (UPE01-0181) to bring current and future operations at the 304 Todd Road construction yard into compliance with Sonoma County Permit and Resource Management Department (Permit Sonoma) regulations. Current and future operations include equipment storage, stockpiling of construction materials, stockpiling of dirt, and stockpiling and processing of asphalt grindings, rock, and broken concrete for recycling. More specifically, obtaining a Use Permit will bring the existing unpermitted facility into compliance with current Sonoma County regulations pursuant to the March 5, 2012 PRMD Notice of Violation and the Settlement Agreement executed on September 20, 2016.

II. EXISTING SETTING:

See Figure 1 (Proposed and Existing Site Plan and Land Use Map).

The project site is on an approximately eighteen (18) acre parcel located south of Todd Road and west of Ghilotti Avenue. Existing land uses surrounding the project site include similar light industrial uses to the east and north, and scattered single-family residences and vacant property to the west and south.

The topography of the project site is relatively flat and slopes gently to the west and south. Elevations range from approximately 100 to 107 feet above mean sea level (msl), with the exception of the soil stockpile located west of Ghilotti Avenue, which varies in elevation up to 140 feet msl. Surface drainage flows in various directions: towards the east from the area of the administrative offices and maintenance shop on the neighboring parcel, and towards the south and west along a drainage ditch that parallels Ghilotti Avenue on its west side and wraps around the equipment and materials storage yard along the southern side. On the east side of Ghilotti Avenue, storm water is conveyed through surface drainage and storm drain systems; Best Management Practices (BMPs) in this area include drop inlet filters and oil booms, plus straw wattles around drop inlets. On the west side of Ghilotti Avenue, storm water is conveyed



Source: Carlie Macy, January 2018

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Figure 1. Proposed and Existing Site Plan and Land Use Map

Ghilotti Construction Company Initial Study
 Sonoma County, California

through a surface drainage system, including open ditches; BMPs here include vegetated areas, restrictions on vehicle traffic, and k-rails around the perimeter of the construction yard.

There are no trees directly on the project site. Trees grow intermittently along Todd Road and Ghilotti Avenue adjacent to the site.

The project site previously supported jurisdictional wetlands and associated federally listed endangered plant species prior to July 1998 when the site was prepared as a construction yard. Ghilotti Construction was required to provide compensatory mitigation for Clean Water Act Section 404 jurisdictional wetlands and associated federally listed endangered plant species impacts that occurred in July 1998 when the project site was being prepared as a construction yard. California tiger salamander had not been listed at that time. The applicant met all previous obligations for biological resource compensatory mitigation through a contribution to the Terra Bagnata Wetland Mitigation Project, which is a 50.18-acre site that provides habitat, wildlife, and plant conservation in Sonoma County, particularly for the California tiger salamander (CTS). As a result of the construction yard project that was mitigated through the contribution to the Terra Bagnata Wetland Mitigation Project, the Ghilotti Construction property no longer supports habitat for CTS or listed plant species.¹ This was confirmed with additional biological resource evaluations prepared for the proposed project.

Ditches surrounding the project site, including one along Ghilotti Avenue, may support CTS in very wet years. These will not be impacted by the project, and mitigation to protect them from sediment flowing offsite in stormwater is proposed for the project, as discussed in the Biology section below.

Based on Figure OSRC-1 (Scenic Resource Areas) of the Sonoma County General Plan 2020 Open Space & Resource Conservation Element, the project site is not located in a Scenic Resource Area. On the map of Sonoma County Important Farmland (2016), the site is identified as "Urban and Built-Up Land" and "Other Land."

The project site is not supplied with water, sewer, or septic service.

III. PROJECT DESCRIPTION

The proposed project would include the following components. See Figure 1 for their on-site locations.

¹ United States Department of the Interior, Fish and Wildlife Service, "Formal Endangered Species Consultation for the Shamrock, Ghilotti, and Terra Bagnata Projects in Santa Rosa, Sonoma County, California (Corps' File No. 29146N)," March 24, 2008; includes "Biological Opinion" by Cay C. Goude, Acting Field Supervisor. Report addressed to Ms. Jane Hicks, Chief, Regulatory Branch, San Francisco District, U.S. Army Corps of Engineers.

Equipment Storage: The equipment storage area would extend from the site's center to its northern boundary. The heavy equipment stored here would include, but not be limited to, excavators, bulldozers, loaders, and dump trucks. Other construction equipment stored in this area would include generators, paving equipment, truck trailers, and fueling trucks. Heavy-duty vehicles would be stored near the site's western boundary. Employees would park their vehicles near the eastern boundary. Equipment in this area would not be stored on-site permanently but rather would remain there until being transported to the next construction location. Operating hours would be limited to daylight hours only, no earlier than 4:30 AM and no later than 9:00 PM, seven days a week; activities occurring outside the hours of operation would require prior written approval from the Director of Permit Sonoma.

Equipment and Material Storage: The equipment and material storage area, located in a central portion of the site, would be utilized for various types of construction materials and supplies including, but not limited to, pipe, precast concrete structures, cast iron and steel, form lumber, concrete barriers, k-rail, erosion control products, straw wattles, and visqueen (e.g., plastic sheeting). These materials would be stored on-site, from various construction projects, until being transported to the next construction project location. Equipment and material storage area operations would be limited to daylight hours only, no earlier than 4:30 AM and no later than 9:00 PM, seven days a week; activities occurring outside the hours of operation would require prior written approval from the Director of Permit Sonoma.

Asphalt, Rock, and Concrete Stockpile: A central portion of the project site is designated for a stockpile of asphalt grindings, rock, and broken concrete imported from construction projects for later use on other construction projects. Stockpile hours of operation would be limited to, no earlier than 7 AM and no later than 9:00 PM, seven days a week; activities occurring outside the hours of operation would require prior written approval from the Director of Permit Sonoma.

Crushing Operations and Recycling: Near the asphalt, rock, and concrete stockpile, these materials would be processed through periodic crushing and recycling, for reuse on other construction projects. Crushing operations would involve an excavator, a loader, and a mobile crushing plant. These operations would be limited to Monday through Saturday from 7:00 AM to 6:00 PM. (Note that these hours are different from the other activities listed above).

To reduce the noise impacts associated with the crushing operations and recycling, the mobile crushing plant would be oriented to the east and away from nearby single-family residences. Also, a 25-foot-high earth berm, as measured above the height of the crusher pad, would extend a minimum distance of 200 feet along the western boundary of the project site and extend along the southern boundary. The applicant is also proposing a 14-foot-high sound wall extending along the remainder of the project site's western boundary. The earth berm and sound wall would be constructed concurrently over an approximately two-month period.

For the proposed earth berm and sound wall, see Figures 2 (Proposed Grading and Stockpile Plan), 3 (Existing View of Stockpile), and 4 (Proposed Berm, Sound Wall, and Tree Plantings).

Soil Stockpile: The southern portion of the project site is designated for a stockpile of native soils imported from construction projects for later use on other projects requiring fill. Soil stockpile operations would be limited to no earlier than 7 AM and no later than 9:00 PM, seven days a week; activities occurring outside the hours of operation would require prior written approval from the Director of Permit Sonoma.

On-Site Employees: Workers from various construction locations would be driving the construction vehicles and equipment to and from the project site, performing the tasks described above, then leaving the project site. The one exception is the "Crushing Operations and Recycling Activity," which would require up to two on-site employees to perform those activities during the scheduled hours of 7:00 AM to 6:00 PM, Monday through Saturday.

Landscape Improvements: Project landscaping would provide vegetative screening. Approximately 52 trees would be planted along the southern (about 12 trees) and western (about 40 trees) sides of the earth berm, plus hydromulch on the berm would enhance the texture and help blend in with local views. In addition, County development review procedures include final design review and approval of final project plans (including landscaping plans), which would ensure project compliance with County standards. More detail is provided in section 1 (Aesthetics) of this Initial Study/Mitigated Negative Declaration.

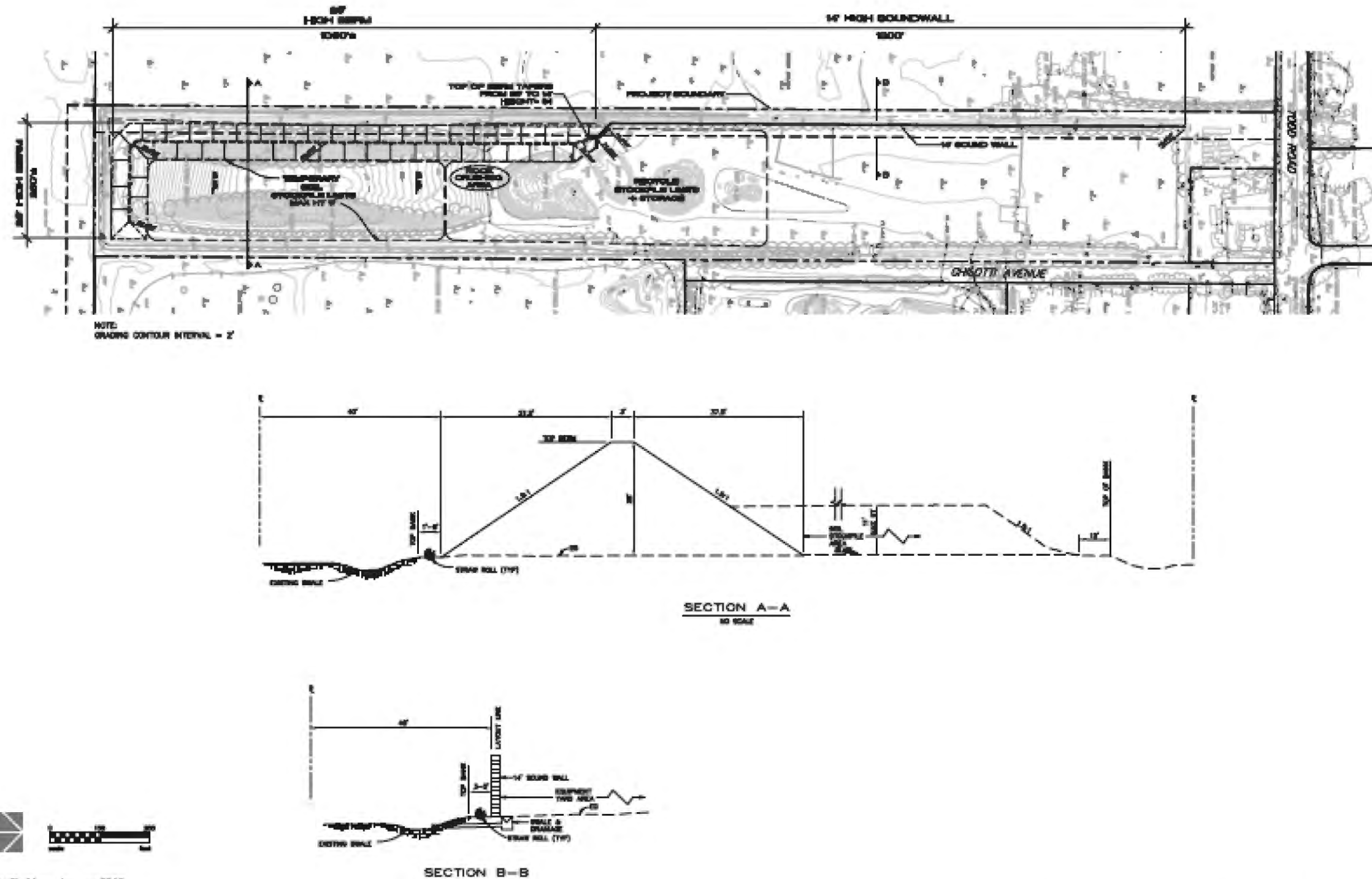
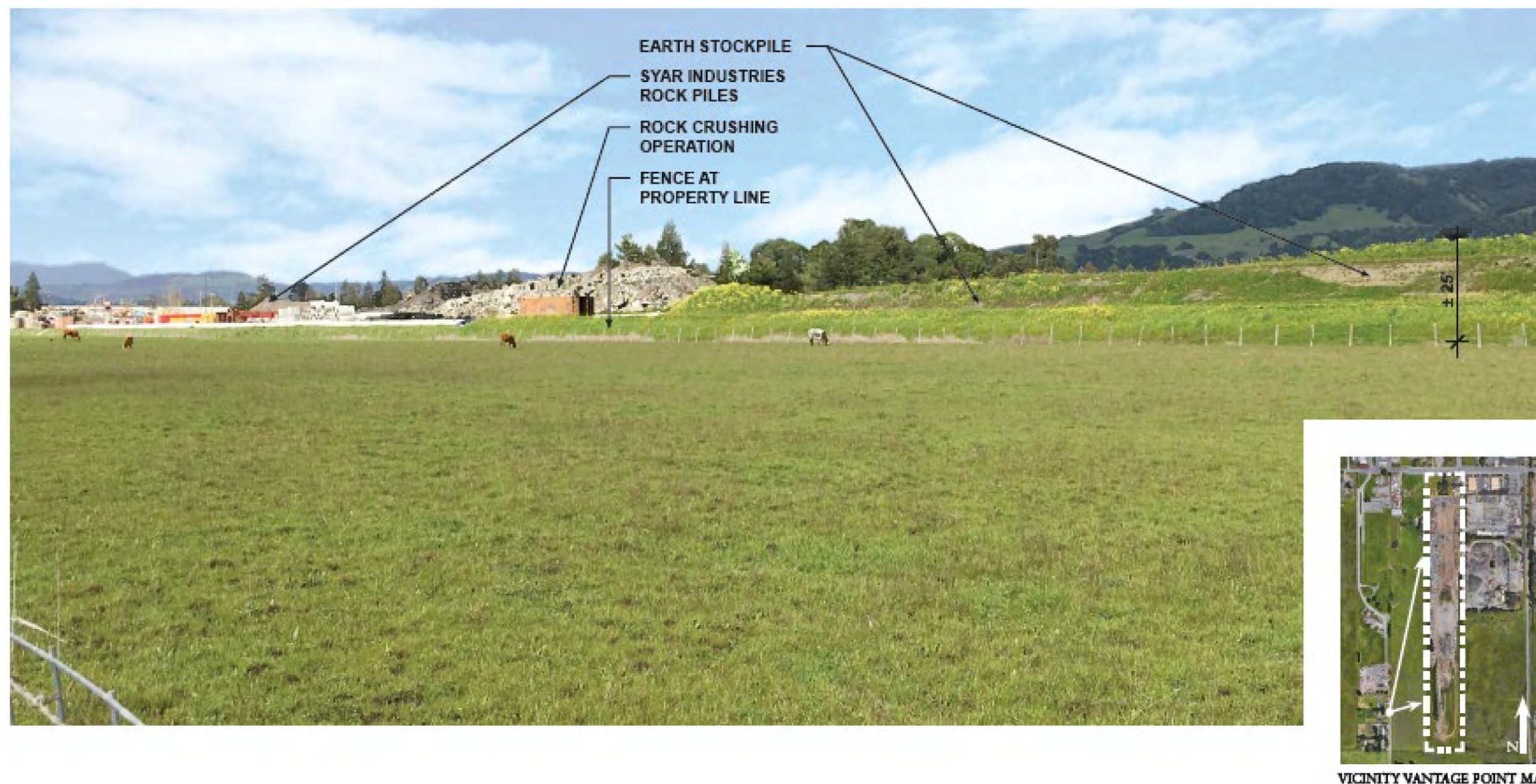


Figure 2. Proposed Grading and Stockpile Plan



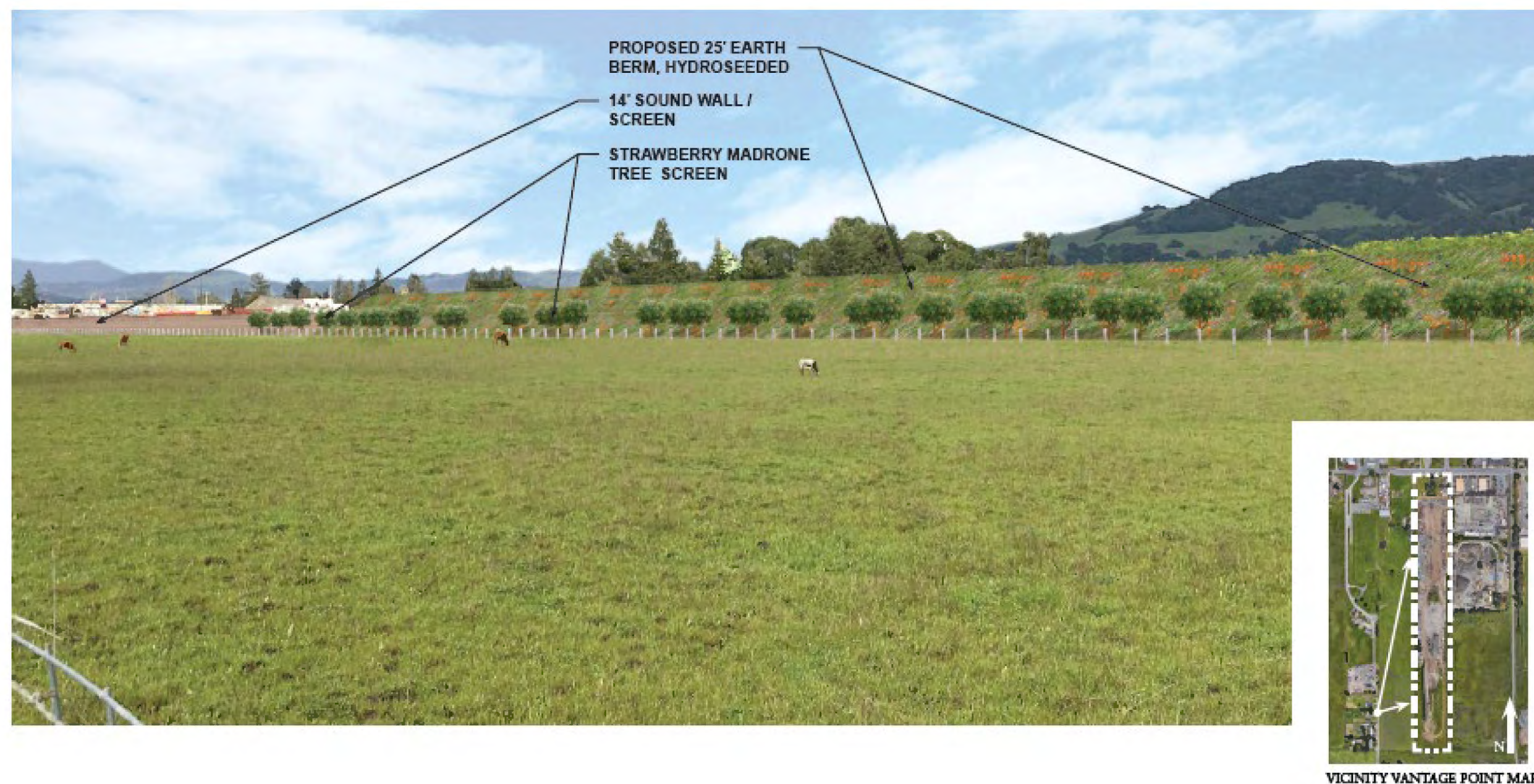
Source: Carlie Maspy, March 26, 2018

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Figure 3. Existing View of Stockpile

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Source: Carlie Macy, March 26, 2018

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Figure 4. Proposed Berm, Sound Wall, and Tree Plantings

Ghilotti Construction Company Initial Study
 Sonoma County, California

Intersection Improvements at Todd Road and Ghilotti Avenue/Standish Avenue: As a project condition of approval, the proposed project would include traffic improvements to the intersection of Todd Road and Ghilotti Avenue/Standish Avenue, including a realignment of Ghilotti Avenue to align with Standish Avenue. The realignment would occur on Ghilotti property at the southwest corner of Ghilotti Avenue and Todd Road. The improvements also would include traffic signals, crosswalks, and ADA ramps and landings.

Standard Urban Storm Water Mitigation Plan (SUSMP): The proposed project includes a Standard Urban Storm Water Mitigation Plan (SUSWMP) to capture and treat 100 percent of site runoff through the existing vegetated swales. Further details are included in section 10 (Hydrology and Water Quality) of this Initial Study/Mitigated Negative Declaration.

IV. ISSUES RAISED BY THE PUBLIC OR AGENCIES

A Draft Initial Study/Mitigated Negative Declaration was circulated September 28, 2020 – October 28, 2020. On October 19, 2020, the California Department of Fish and Wildlife (CDFW) sent a letter commenting on the IS/MND. The letter stated that the IS/MND needed to address potential impacts to California Tiger Salamander (CTS), riparian habitat or other sensitive communities, and impacts to state or federally protected wetlands, and/or streams and wetland habitat.

This Recirculated IS/MND provides additional information to address CDFW's comments.

Two referral packets were previously circulated to inform and solicit comments from relevant local and state agencies, stakeholders that were anticipated to take interest in the project, and tribes affiliated with the project area. As of May 28, 2020, the project planner received responses to the project referral from the following Sonoma County departments: Department of Transportation and Public Works (DTPW), Fire and Emergency Services Department, Permit and Resource Management Department (PRMD) Project Review Section Health, and PRMD Grading and Storm Water Section. The project planner also received a referral response from the Northwest Information Center (NWIC) of Sonoma State University. The referral responses included comments on the project, several requests for further information, and project use permit conditions of approval, including updated comments, requests, and conditions of approval in response to revised project plans. The project planner did not receive referral responses from any state or federal agencies, or from any tribes affiliated with the project area.

V. EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts of this project based on the criteria set forth in the State CEQA Guidelines and the County's implementing ordinances and guidelines. For each item, one of four responses is given:

No Impact: The project would not have the impact described. The project may have a beneficial effect, but there is no potential for the project to create or add increment to the impact described.

Less Than Significant Impact: The project would have the impact described, but the impact would not be significant. Mitigation is not required, although the project applicant may choose to modify the project to avoid the impacts.

Less than Significant with Mitigation Incorporated: The project would have the impact described, and the impact could be significant. One or more mitigation measures have been identified that will reduce the impact to a less than significant level.

Potentially Significant Impact: The project would have the impact described, and the impact could be significant. The impact cannot be reduced to less than significant by incorporating mitigation measures. An environmental impact report must be prepared for this project.

Each question was answered by evaluating the project as proposed, that is, without considering the effect of any added mitigation measures. The Initial Study includes a discussion of the potential impacts and identifies mitigation measures to substantially reduce those impacts to a level of insignificance where feasible. All references and sources used in this Initial Study are listed in the References section at the end of this report.

1. AESTHETICS:

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?

Comment:

A scenic vista is a view from a particular location or composition of views along a roadway or a trail. Scenic vistas often describe views of natural undisturbed land but may also be composed of natural and developed areas, or even developed and unnatural areas such as the scenic view of a rural historic town and surrounding agricultural lands.

The project is not in an area designated as visually sensitive by the Sonoma County General Plan (i.e., Scenic Landscape Unit, Scenic Corridor, Community Separator). The nearest Scenic Corridor is US 101, approximately 1,700 to the east. The nearest Community Separator is about 1,550 feet to the southeast. The nearest Scenic Landscape Unit is over a mile to the west.

The most conspicuous scenic resource is the Taylor Mountain range east of the project site. However, due to the generally flat, level topography in the vicinity of the project site, public vantage points can be limited by intervening structures, trees, and vegetation. Soil stockpiles are proposed to be limited to 11 feet in height to avoid blocking views of Taylor Mountain from nearby residential lots, and at all times would not be allowed to exceed the height of the sound wall.

Significance Level: Less than Significant Impact

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

Comment:

The project site does not contain scenic resources. The project is not located on a site visible from a state scenic highway (officially designated state scenic highways in Sonoma County are Highway 116 from Highway 1 to the Sebastopol city limits, and Highway 12 from Danielli Avenue east of Santa Rosa to London Way in Agua Caliente).² The designated portion of Highway 116 is over 5 miles away from the project; the designated portion of Highway 12 is over 7 miles from the project. Therefore, the project would not substantially damage scenic resources, including resources within a state scenic highway.

Significance Level: No Impact

² Caltrans, Scenic Highways, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed 5/21/20.

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

Comment:

The project site is located approximately 1,700 feet from the Todd Road onramp to US 101, with general and light industrial uses on all but one side of the project parcel. The adjacent property to the west is designated for rural residential use, and there are several other rural residences in the area to the west and southwest. Public vantage points looking west and south offer views of rural areas, with houses, farm buildings, trailers, agricultural equipment, and fields.

North of the project site across Todd Road is a mixture of commercial uses with some residences. East on Todd Road toward US 101, the visual character of the area takes on a more commercial and industrial character.

As shown on Figure 5, public views of the Sonoma Mountains are present to the east along Todd Road. In addition, public views of the Sonoma Mountains are also present to the east and northeast along Langer Road (see Figures 6 and 7).



*Figure 5. View looking east from Todd Road near project site
(Sonoma Mountains in background; project site on right)
(Source: Google Maps street view)*



*Figure 6. View looking northeast from Langer Avenue about one-eighth mile north of Scenic Avenue (to the left, project soil stockpile; Sonoma Mountains in background)
(Source: Google Maps street view)*

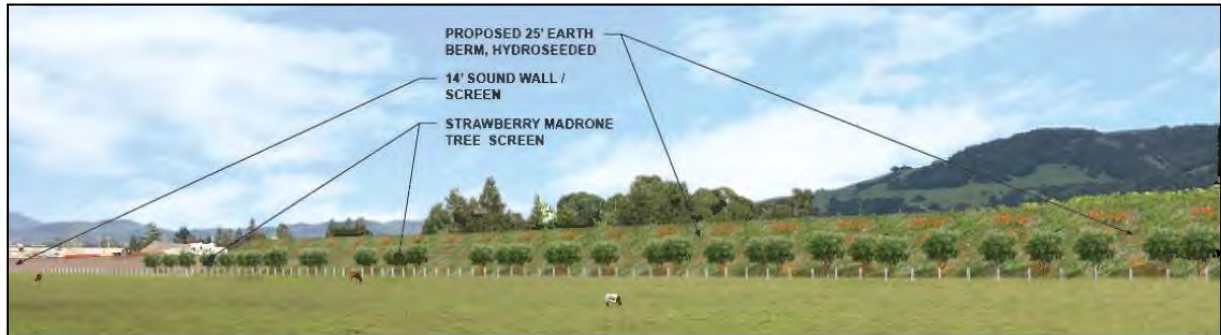


*Figure 7. View looking east from Langer Avenue about one-third mile north of Scenic Avenue, where public access ends (project soil stockpile with Sonoma Mountains in background)
(Source: Google Maps street view)*

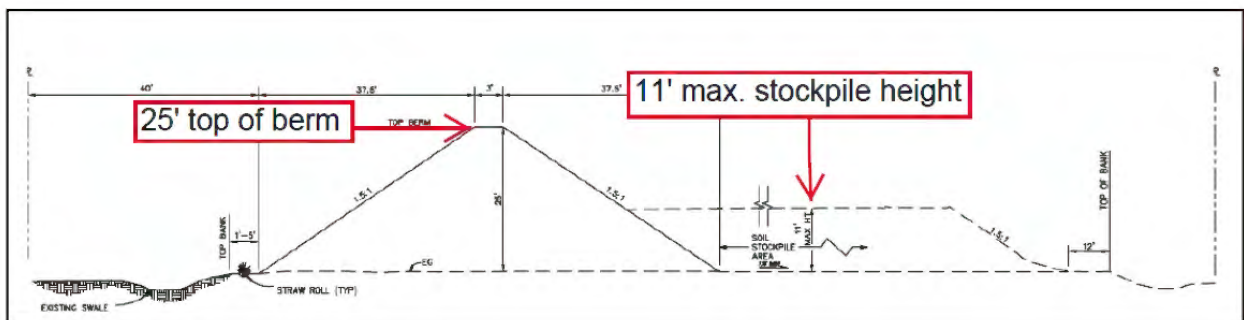
The project proposes a 14-foot-high masonry sound wall along the western side of the site, extending from the northern part to where the project soil stockpile begins. From there, a 25-foot-high earth berm would be constructed along the remainder of the western side and around the southern side of the soil stockpile. The sound wall and berm would act as a

visual barrier screening project operations from views on adjoining properties and public streets.

Figure 8 shows a simulation of the proposed sound wall and berm and how they would screen views of equipment and vehicles, as well as the soil stockpile. As shown on Figure 9, the soil stockpile is proposed to have a maximum height of 11 feet (and at all times would not be allowed to exceed the height of the sound wall), which would be entirely obscured by the berm.



*Figure 8. Visual Simulation of Proposed Berm and Soil Stockpile, from Figure 4 Proposed Berm, Sound Wall, and Tree Plantings
(Source: Carlile Macy, March 26, 2018)*



*Figure 9. Proposed Berm and Soil Stockpile Cross-section, from Figure 2 Proposed Grading and Stockpile Plan
(Source: Carlile Macy, January 2018)*

Project landscaping would provide vegetative screening. According to the proposed landscape plan (Carlile Macy, January 2018), approximately 52 trees would be planted along the southern (about 12 trees) and western (about 40 trees) sides of the earth berm, plus hydromulch on the berm would enhance the texture and help blend in with local views. Because the proposed berm would be higher than the soil stockpile, it would screen views

of the stockpile, and there would be no degradation in the existing visual character or quality of public views of the site and its surroundings.

In addition, County development review procedures include final design review and approval of final project plans (including landscaping plans), which would ensure project compliance with County standards.

Following County “Visual Assessment Guidelines,”³ public viewpoints were considered to determine the project’s visibility to the public. Based on the County “Visual Assessment Guidelines,” the project site sensitivity would be considered “Low” because:

“The site is within an urban land use designation and has no land use or zoning designations protecting scenic resources. The project vicinity is characterized by urban development or the site is surrounded by urban zoning designations and has no historic character and is not a gateway to a community. The project site terrain has visible slopes less than 20 percent and is not on a prominent ridgeline and has no significant natural vegetation of aesthetic value to the surrounding community.”⁴

The project would include no structures that could attract attention due to their size, form, color, and texture; as noted earlier, the site topography is generally level. Proposed uses would not represent a distinctive visual change to the site over existing conditions because of existing landscaping and fencing that obstruct most public views. From southern viewpoints, there could be visual disruption, but as described above, the project would include an earthen berm with landscaping that would provide a visual screen.

Based on County “Visual Assessment Guidelines,” the project’s visual dominance would be considered “Subordinate” because:

“Project is minimally visible from public view. Element contrasts are weak – they can be seen but do not attract attention. Project generally repeats the form, line, color, texture, and night lighting of its surroundings.”⁵

The project is in an area characterized by large parcels with rural open fields to the south and west and commercial/light industrial development to the north and east. Because of the distance and scale of the fields, project elements blend with the natural background from viewpoints looking south and west (see Figures 10 and 11).

³ Sonoma County, Visual Assessment Guidelines, January 2019, <https://sonomacounty.ca.gov/PRMD/Regulations/Environmental-Review-Guidelines/Visual-Assessment-Guidelines/>, accessed 5/22/20.

⁴ Visual Assessment Guidelines, Table 1 - Site Sensitivity.

⁵ Visual Assessment Guidelines, Table 2 - Visual Dominance.



*Figure 10. View looking west from Todd Road near project site (project site on left)
(Source: Google Maps street view)*



*Figure 11. View looking south from Todd Road directly west of project site,
including neighboring property
(Source: Google Maps street view)*

From viewpoints looking north and east, project elements are less noticeable due to the existing commercial and light industrial character of the area. Also, as discussed in the project description, the proposed project would not include any new structures, and therefore there would be no aesthetics effects related to contrasting colors in building material or accent materials.

The project's visual effect on the visual character or quality of the site and its surroundings was determined based on County "Visual assessment Guidelines" Table 3 – Thresholds of Significance for Visual Impact Analysis⁶:

Table 3
Thresholds of Significance for Visual Impact Analysis

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

Considering the project's "Low" visual sensitivity and the project's "Subordinate" visual dominance, the project would be considered to have a "Less than Significant" effect on the existing visual character or quality of the site and its surroundings.

The proposed project is subject to the South Santa Rosa Area Plan. The South Santa Rosa Area Plan (p. 21) includes the following standards related to visual amenities:

1. *Protect and maintain open scenic areas essential for defining the urban form of Santa Rosa through use of scenic conservation easements.*
2. *Protect the scenic areas within the study district which one is important for visual and psychological relief from Santa Rosa urban environment.*
3. *Protect visually established Design Review process for development of all lands east of Petaluma Hill Road.*
4. *Use the established Design Review process for development of all lands east of Petaluma Hill Road.*

⁶ Visual Assessment Guidelines, Table 3 - Thresholds of Significance for Visual Impact Analysis.

5. *Require building and grading setbacks from riparian corridors to preserve ecological, agricultural and aesthetic values.*

The project's General Plan land use designation (LI-Limited Industrial) is defined in the South Santa Rosa Area Plan (p. 36) as: "[L]ight industrial in combination with heavy commercial land uses including such uses as automobile sales and service establishments, mobile home sales and service establishments, cabinet shops, truck terminals, contractors yards, landscaping materials yards, light assembly plants, and light distributing plants." The project use is consistent with the LI-Limited Industrial land use designation. In addition, the project would not conflict with any of the South Santa Rosa Area Plan standards listed above, based on the following:

1. The project does not propose an increase in existing uses nor does it propose any structures that might encroach on an open scenic area, and therefore would help to protect and maintain open scenic areas.
2. The project is not located in a study district important for visual and psychological relief; however as noted previously, the project would help to protect and maintain existing open scenic areas because it does not propose an increase in existing uses or any structures.
3. The project is not located east of Petaluma Hill Road; however, the project would still be required to undergo final administrative design review to ensure visual compatibility.
4. As noted above, although the project is not located east of Petaluma Hill Road, project plans would undergo administrative design review to ensure visual compatibility.
5. The project is not located within a riparian corridor; however, the project would be required to comply with setback requirements as specified in the County's grading ordinance (County Code Sec. 11-14-020).

Significance Level: Less than Significant Impact

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

Comment:

Proposed project operations would be limited to daylight hours only, no earlier than 4:30 AM and no later than 9:00 PM, seven days a week. Existing security lighting is required to be directed downward and be shielded from off-site to prevent glare.

Significance Level: No Impact

2. AGRICULTURE AND FOREST RESOURCES:

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

Would the project:

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

Comment:

According to the Sonoma County Important Farmlands Map,⁷ the project site is designated as Farmland of Local Importance, Other Land, and Urban and Built-Up Land. The site is industrial and currently supports a construction materials transport and storage operation. Most of the site is Other Land, while the northernmost tip of the parcel is Farmland of Local Importance. There is no agricultural use onsite, and the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

Significance Level: No Impact

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

Comment:

The project site is zoned M3, which allows Limited Rural Industrial operations. The site is also zoned Valley Oak Habitat Combining District, but there are no trees onsite. The site's General Plan Land Use designation is LI-Limited Industrial, which allows jobs and services outside Urban Service Areas. The project site is not under a Williamson Act Contract.⁸ The

⁷ Sonoma County. Important Farmlands Map, <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Sonoma.aspx>, accessed 5/14/20

⁸ Sonoma County. GIS Mapping tool, <http://sonomamap.maps.arcgis.com/apps/webappviewer/index.html> accessed 5/15/20

site currently does not support agricultural uses, and the project would not conflict with a Williamson Act Contract.

Significance Level: No Impact

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

Comment:

The project site is not in a Timberland Production zoning district, nor would it cause a rezoning of forest land.

Significance Level: No Impact

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

Comment:

There is no forest land nor trees on the project parcel. As discussed in (c) above, the project would not result in loss of forest land or conversion of forest land to non-forest use.

Significance Level: No Impact

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

Comment:

As discussed in (a) above, the project site is designated as Farmland of Local Importance, Other Land, and Urban and Built-Up Land. The site does not support agricultural uses, and the project would not involve the conversion of farmland to non-agricultural use or forest land to non-forest use.

Significance Level: Less than Significant Impact

3. AIR QUALITY:

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

Would the project:

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

Comment:

The project is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD), which is currently designated as a nonattainment area for state and federal ozone standards, the state PM₁₀ standard, and the state and federal PM_{2.5} standard. On April 19, 2017, the BAAQMD adopted its *Spare the Air-Cool the Climate 2017 Clean Air Plan*.⁹ The 2017 CAP updates the most recent Bay Area ozone plan, the 2010 Clean Air Plan, in fulfillment of state ozone planning requirements. Over the next 35 years, the Plan will focus on the three following goals:

- Attain all state and national quality standards;
- Eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and
- Reduce Bay Area GHG Emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050.

The 2017 Clean Air Plan includes increases in regional construction, area, mobile, and stationary source activities and operations in its emission inventories and plans for achieving attainment of air quality standards. Chapter 5 of the 2017 Clean Air Plan contains the BAAQMD's strategy for achieving the plan's climate and air quality goals. This control strategy is the backbone of the Clean Air Plan. It identifies 85 distinct control measures designed to comply with state and federal air quality standards and planning requirements, protect public health by reducing emissions of ozone precursors, PM, and TACs, and reduce greenhouse gases (GHG) emissions. The 85 control measures identified in the 2017 Clean Air Plan are grouped by nine economic-based "sectors": Agriculture, Buildings, Energy, Natural and Working Lands, Stationary Sources, Super GHGs, Transportation, Waste, and Water. Most of the 85 control measures are implemented at the local and regional level by municipal government and the BAAQMD and thus are not directly applicable to the proposed project. The proposed project would not conflict with or obstruct implementation of the BAAQMD's 2017 Clean Air Plan because: 1) It does not include significant sources of ozone precursor emissions, PM, or TACs (see discussion b) and c) below); 2) it would not exacerbate or increase disparities in cancer risks from TAC emissions (see discussion c) below); and 3) it would not result in GHG emissions that interfere with state GHG reduction goals (see Section 8, Greenhouse Gas Emissions, in this Initial Study).

An Air Quality study was conducted for the project¹⁰ which determined (p. 7) that the project would not conduct any operations on-site that are subject to BAAQMD regulations

⁹"Spare the Air-Cool the Climate, Final 2017 Clean Air Plan," April 19, 2017, Bay Area Air Quality Management District, <https://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a-proposed-final-cap-vol-1-pdf.pdf?la=en>

¹⁰ "304 Todd Road Project Air Quality and Greenhouse Gas Emissions Assessment, Sonoma County, California," Illingworth & Rodkin, Inc., 2nd Revision November 30, 2018.

because the crushing operations would be conducted for only 44 days per year or less and the equipment would be considered portable.

Significance Level: Less than Significant Impact

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

Comment:

The federal and state governments have established ambient air quality standards for “criteria” pollutants considered harmful to the environment and public health. National Ambient Air Quality Standards (NAAQS) have been established for carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), fine particulate matter (particles 2.5 microns in diameter and smaller, or PM_{2.5}), inhalable coarse particulate matter (particles between 2.5 and 10 microns in diameter, or PM₁₀), and sulfur dioxide (SO₂). California Ambient Air Quality Standards (CAAQS) are more stringent than the national standards for the pollutants listed above and include the following additional pollutants: hydrogen sulfide (H₂S), sulfates (SO_x), and vinyl chloride. In addition to these criteria pollutants, the federal and state governments have classified certain pollutants as hazardous air pollutants (HAPs) or toxic air contaminants (TACs), such as asbestos and diesel particulate matter (DPM).

The proposed project would generate short-term construction and long-term operational emissions of regulated air pollutants. Project construction and operational emissions were modeled using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2 and an emission factor for wind erosion in storage pile areas from the BAAQMD Permit Handbook for Crushing and Grinding sources under Miscellaneous Sources. The calculations were then evaluated against BAAQMD’s CEQA thresholds of significance. Criteria air pollutant emissions were estimated for all project components, including:

- Construction of the proposed sound wall and earthen berm, and related grading; and
- Operation of the proposed contractor’s equipment storage site, rock material stockpile location, and asphalt and concrete crushing operations. For the purposes of this air quality impact analysis, the crushing operations component was assumed to occur for 8 hours per day over 44 days in any given year, processing approximately 100 tons of material per hour (which would equal approximately 37,500 tons per year).

Construction Emissions

Project construction activities would include grading for the berm (primarily moving soil on-site) and sound wall, transportation of sound wall construction materials, and realignment of Ghilotti Avenue at Todd Road. Ground disturbing activities associated with grading would

generate the highest level of dust and particulate matter. CalEEMod default assumptions for construction phases, duration, equipment, and deliveries were used in the modeling, with the following project-specific modifications:

1. Default construction equipment was modified to include specific equipment types provided by the applicant.

The project's estimated construction emissions, evaluated against the BAAQMD CEQA thresholds, are presented in Table 4.

Table 4. Project Construction Emissions

	Pollutant Emissions (Average Pounds Per Day) ^(A)			
	ROG	NO _x	PM ₁₀ ^(B)	PM _{2.5} ^(B)
Average Daily Construction Emissions	0.15	1.80	0.08	0.08
BAAQMD Significance Threshold	54	54	82	54
<i>Exceeds BAAQMD Significance Threshold?</i>	No	No	No	No
Source: Illingworth & Rodkin, Inc., 2018. (A) Average daily emissions assume 266 construction days for the sound wall and 12 construction days for the earth berm. (B) Particulate matter emissions measured for exhaust. For dust control, BAAQMD recommends incorporation of a set of standard best management practices (BMPs). These BMPs have been incorporated into the project as Mitigation Measure AIR-1.				

As shown in Table 4, potential project construction emissions would be below all BAAQMD significance thresholds; however, BAAQMD recommends implementation of eight "Basic Construction Mitigation Measures" for all projects to reduce construction fugitive dust emission levels. These basic measures are also used to meet BAAQMD's best management practices (BMPs) threshold of significance for construction fugitive dust emissions (i.e., the implementation of all basic construction measures renders fugitive dust impacts a less than significant impact). The applicant would implement these BMPs and other standard County requirements for controlling dust through Mitigation Measure AIR-1.

Operational Emissions

Operational activities would generate air pollutant emissions from dust related to handling, processing, and transportation of materials; exposed stockpiles; on-site equipment use (crusher, loaders, bulldozers, excavators, grader, forklift); vehicle (truck) use to transport materials associated with crushing operations; and worker traffic. The project site would include no new or existing buildings (i.e., no building electricity or natural gas usage, and no landscape maintenance activities except irrigating the proposed berm). Two separate

CalEEMod runs were used to determine (1) emissions from daily activities for a 266-day (1-year) period, and (2) emissions from the maximum 44-day crushing activity period, with specific equipment types provided by the applicant. Also, maximum daily truck trips (50 daily truck trips), based on the traffic report prepared for the applicant (with an average of 15 trucks per day) were included in the calculations. Off-site travel was based on default parameters in CalEEMod. The results of the two CalEEMod runs combined show maximum project operational emissions, as summarized below in Table 5.

Table 5. Project Operational Emissions

	Pollutant Emissions (Tons per Year)			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Typical Operation	0.12	2.57	0.65	0.20
BAAQMD Significance Threshold	10	10	15	10
<i>Exceeds BAAQMD Significance Threshold?</i>	No	No	No	No
Source: Illingworth & Rodkin, Inc., 2018.				

As shown in Table 5, proposed project operational emissions would be below the BAAQMD's recommended CEQA significance thresholds and would thus represent a less than significant impact.

Cumulative Impacts

As discussed in section a), the San Francisco Bay Area Air Basin is an area of non-attainment for national and state ozone, state PM₁₀, and national and state PM_{2.5} air quality standards. Regarding cumulative impacts, the BAAQMD's CEQA Air Quality Guidelines state (BAAQMD 2017c, pg. 2-1):¹¹

"SFBAAB's non-attainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is unnecessary."

¹¹California Environmental Quality Act Air Quality Guidelines, May 2017, Bay Area Air Quality Management District, http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en

As discussed, in section a) and shown in Tables 4 and 5, the proposed project does not conflict with the BAAQMD's 2017 Clean Air Plan and would not result in construction or operational emissions that exceed BAAQMD construction or operational screening criteria. Since the proposed project would not individually exceed any BAAQMD CEQA significance thresholds with application of Mitigation Measure AIR-1, the project's cumulative air quality impact would be less than significant with mitigation incorporated.

Significance Level: Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measure AIR-1 (Construction-related):

- a. The following dust control measures shall be included in the project specifications on all grading and building plans:
 - 1) Water or alternative dust control shall be sprayed to control dust on construction areas, soil stockpiles, and staging areas during construction as directed by the County.
 - 2) Trucks hauling soil, sand and other loose materials over public roads shall cover their loads or keep the loads at least two feet below the level of the sides of the container or wet the load sufficiently to prevent dust emissions.
 - 3) Paved roads shall be swept as needed to remove soil that has been carried from the project site.
- b. The following BAAQMD Best Management Practices (BMPs) shall be included in the project:
 - 1) Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) two times per day during construction and adequately wet demolition surfaces to limit visible dust emissions.
 - 2) Cover all haul trucks transporting soil, sand, or other loose materials off the project site.
 - 3) Use wet power vacuum street sweepers at least once per day to remove all visible mud or dirt track-out onto adjacent roads (dry power sweeping is prohibited) during construction of the proposed project.
 - 4) Vehicle speeds on unpaved roads/areas shall not exceed 15 miles per hour.
 - 5) Complete all areas to be paved as soon as possible and lay building pads as soon as possible after grading unless seeding or soil binders are used.
 - 6) Minimize idling time of diesel-powered construction equipment to five minutes and post signs reminding workers of this idling restriction at all access points and equipment staging areas during construction of the proposed project.
 - 7) Maintain and properly tune all construction equipment in accordance with manufacturer's specifications and have a CARB-certified visible emissions evaluator check equipment prior to use at the site.

- 8) Post a publicly visible sign with the name and telephone number of the construction contractor and County staff person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The publicly visible sign shall also include the contact phone number for the BAAQMD to ensure compliance with applicable regulations.

Monitoring:

Mitigation Monitoring AIR-1 (Construction-related): County staff shall ensure that the construction period air quality measures are listed on all site alteration, grading, building or improvement plans prior to issuance of grading or building permits.

c) Expose sensitive receptors to substantial pollutant concentrations?

Comment:

Some people are more affected by air pollution than others. The BAAQMD defines sensitive receptors as “facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly and people with illnesses.”¹² In general, children, senior citizens, and individuals with pre-existing health issues, such as asthmatics, are considered sensitive receptors. Both CARB and the BAAQMD consider schools, schoolyards, parks and playgrounds, daycare facilities, nursing homes, hospitals, and residential areas as sensitive air quality land uses and receptors.¹³

There are several sensitive receptors located within 1,000 feet of the proposed project. The closest is a single-family residence about 80 feet west of the equipment storage site. Other nearby sensitive receptors include single-family residences approximately 300 feet north of the site across Todd Road, and six single-family residences along Langner Avenue to the west, southwest, and south of the site, over 400 feet from the site.

Exposure of sensitive receptors to air pollutant levels that would result in an unacceptable cancer risk or hazard are considered significant by BAAQMD. For cancer risk, the significance threshold for a single source is an increased risk of contracting cancer that is 10 in one million chances or greater. In addition, BAAQMD considers the significance threshold for cumulative exposure to toxic air contaminants (TACs) as an increased risk of contracting cancer that is 100 in one million chances or greater. The significance threshold for exposure to PM_{2.5} is annual concentrations exceeding 0.3 micrograms per cubic meter (µg/m³) from a single source and annual concentrations exceeding 0.8 µg/m³ from cumulative sources.

The Air Quality study (pp. 11-17) evaluated predicted concentrations of TACs and PM_{2.5} at sensitive receptors within 1,000 feet of the project site. These calculations computed the excess cancer risk, annual PM_{2.5} concentrations, and non-cancer health hazard, expressed as

¹² BAAQMD 2017.

¹³ BAAQMD 2017; California Air Resources Board, “Air Quality and Land Use Handbook: A Community Health Perspective,” April 2005, <https://ww3.arb.ca.gov/ch/handbook.pdf>, accessed 1/22/2020.

a “Hazard Index.” (Refer to Appendix A for the full Air Quality study, which includes a description of the modeling and methodology used for this health risk assessment.)

Project-related construction activities would emit criteria and hazardous air pollutants (including PM_{2.5} and PM₁₀ from equipment and vehicle exhaust) but would not result in substantial pollutant concentrations because, as shown in Table 4, the proposed construction emissions would be below all BAAQMD construction emission thresholds, and project construction emissions would occur intermittently during the daytime weekday period (i.e., not a continuous source of emissions).

Project operations would include TAC emissions from diesel equipment and truck operation on or near the site. Site operations were modeled as TAC and exhaust PM_{2.5} emissions for the truck and worker parking area, the equipment yard area, the crushing area, and truck travel and wind erosion areas within the crushing and storage piles areas. In addition, TAC and exhaust PM_{2.5} emissions for construction of the berm and sound wall were also modeled, as were fugitive dust emissions, which were included in the dispersion modeling.

Table 6 shows the cancer risk, annual PM_{2.5}, and hazard index (HI) at the receptor that had the maximum impact (a residence immediately west of the northern portion of the project site), and the cumulative risk, which included predicted impacts on the receptor most affected by the proposed project from other substantial sources near the project site (i.e., Syar Industries asphalt plant and materials storage and crushing operations; Ghilotti construction yard parking and construction vehicle maintenance; and Todd Road traffic).

**Table 6. Community Risk: Single and Combined Sources
at Location of Maximum Project Impact**

Source	Maximum Cancer Risk (per million)	PM _{2.5} concentration (ug/m ³)	Hazard Index
Project TAC and fugitive sources	9.0	0.14	<0.01
BAAQMD Single-Source Significance Threshold	10.0	0.3	1.0
Ghilotti Yard – TAC sources	0.5	0.0	0.0
Syar Industries – TAC and fugitive sources combined	32.8	0.54	0.01
Todd Road traffic – TAC and PM _{2.5}	1.1	0.02	<0.01
<i>Combined Sources Total</i>	43.4	0.70	0.03
BAAQMD Combined Sources Significance Thresholds	100	0.8	10.0
Source: Illingworth & Rodkin, Inc., 2018.			

Based on this analysis, the maximum cancer risks, PM_{2.5} concentrations, and Hazard Index for both the single source and combined source would not exceed their respective thresholds. Therefore, because the exposure risks would not exceed the significance thresholds, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. The impact would be less than significant.

Significance Level: Less than Significant Impact

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

Comment:

Construction activity odors would be short-term and intermittent, and would not result in the release of unusual odors. In addition, potential construction odors would not impact a substantial number of people.

Project operations could generate odors from localized emissions of diesel exhaust (equipment operation and truck activity), which may be noticeable at the site boundary from time to time. BAAQMD has established odor screening thresholds for land uses that have the potential to generate substantial odor complaints, including wastewater treatment plants, landfills or transfer stations, composting facilities, confined animal facilities, food manufacturing, and chemical plants. The proposed project does not include any of these sources, and construction yard facilities are not listed among those considered as sources of odors.

Significance Level: Less than Significant Impact

4. BIOLOGICAL RESOURCES:

This section of the MND addresses biological resources within and surrounding the 18-acre project site and evaluates impacts to these resources in accordance with Appendix G of the 2020 CEQA Guidelines.

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Comment:

Project Site

A Biological Resources Evaluation was prepared by Lucy Macmillan in January 2021¹⁴ and updated in September 2021¹⁵. Attached to the January 2021 report was a California tiger salamander (CTS) habitat assessment, prepared by Sol Ecology, dated January 18, 2021, which was updated (September 15, 2021¹⁶). Sol Ecology also completed a rare plant survey report dated July 22, 2021 that is attached to the Lucy Macmillan report updated in September 2021.

Special-Status Amphibian Species. The project site is within the range of the California Tiger Salamander (*Ambystoma californica*; CTS) and is located within the Santa Rosa Plain Conservation Strategy Area. The site is designated as “future development” and is within the “urban growth boundaries” of the Santa Rosa Plain Conservation Strategy Area. The CTS Sonoma County Distinct Population Segment is listed as endangered under the federal Endangered Species Act, and as threatened under California Fish and Game Code. Critical habitat for CTS has also been designated within the Santa Rosa Plain.

There are 51 documented localities of CTS within 3.1 miles of the project site. Of these, three are located east of Highway 101, a known barrier to CTS. The remaining records are located west, north, and south of the site, two to the southeast (#328, #726), and one (#780) within the project site. The occurrence within the project site is recorded in an ephemeral erosion control ditch at the southern end of the site. This occurrence is presumed partially extirpated and consisted of two larvae observed in February 2003, one juvenile caught in a pitfall trap in November 2010, and another individual (life stage not specified) in 2013, presumed to be migrating from aestivation sites to breeding habitat. The exact location of breeding activity on-site is not known but is presumed to be in an erosion control ditch alongside Ghilotti Avenue as described in the occurrence record, which is actually immediately adjacent to the project but is not within the currently proposed project footprint.

There are 14 documented occurrence records of CTS located within 1.3 miles (2 km) of the project site, the distance CTS have been known to migrate between wetland breeding sites and upland burrows for hibernation (aestivation). This does not include the occurrence along Ghilotti Avenue (#780) or the one on the east of Highway 101. The nearest documented occurrence free from dispersal barriers (#668) is located approximately 1,700 feet or 0.32 miles (0.51 km) to the south and consisted of a single adult observation in 2013, that is presumed still extant in the area. The most recent nearby documented occurrence (#328), 0.65 miles (1 km) from the site was of larvae in 2019 observed in ponded drainages and vernal swales, (with regular observations of larvae in this area dating back to 1993). A

¹⁴ Macmillan, L. “Biologist Report,” January 22, 2021.

¹⁵ Macmillan, L. Letter re California Tiger Salamander and Biological Resource Issues, Ghilotti Use Permit Application UPE01-0181, Santa Rosa, Sonoma County, California, September 15, 2021

¹⁶ Sol Ecology Letter re California Tiger Salamander Assessment for 304 Todd Road in Santa Rosa, California – Revised per Updated Site Plan

majority of the remaining documented occurrences are of larvae or eggs and are considered extant, however due to continued development in the area, certain occurrences particularly those to the north of the project site within the “urban growth boundaries” could be extirpated.

An assessment for CTS on the project site was completed by Diana Riggs of Sol Ecology (Sol Ecology, 9/15/2021). The assessment found suitable CTS breeding habitat immediately adjacent to the project site, on the applicant’s property, but beyond the area of project operations. The area of suitable breeding habitat is within an ephemeral erosion ditch located along Ghilotti Avenue and is likely the location of the one occurrence record of CTS on the project site. The CTS Assessment states that the ditch provides suitable breeding habitat in above normal rainfall years and may provide isolated breeding pools towards the southern end in normal rainfall years. The CTS Assessment concluded vehicular and vibration disturbance likely precludes aestivation (dormancy/hibernation in dry weather) in the area.

The September 2021 CTS Assessment determined that the project would not result in an impact to CTS because the site contains fill material and compaction from on-site activities dating to the late 1990s, and does not contain suitable upland refugia for CTS. K-rail surrounds the operational portion of the project area, which provides a barrier to CTS dispersal and prevents on-site soils from discharging into adjacent wetlands. The CTS Assessment concluded that the project is not likely to impact CTS and that no compensatory measures are required. The assessment recommends maintaining the K-rail remains in place or replacing with a new permanent fence to ensure avoidance of impacts to CTS and nearby CTS habitat. Mitigation Measure BIO-2 would require the applicant to maintain a barrier of either the existing k-rail or a permanent fence with a solid surface at ground level to prevent CTS from entering the site and to protect potential CTS habitat adjacent to the site. Mitigation Measure BIO-2 recommends the k-rail or fencing and measures to prevent CTS from migrating into the work area and to protect water and habitat quality for CTS. In addition, drainage ditches on the periphery of the site would be protected from erosion sedimentation through the implementation of LID features required by Chapter 11 of the Sonoma County Grading Ordinance.

Special-status Plant Species. The Study Area is within the Santa Rosa Plain and potentially supports the habitat of four state and federally listed plant species known to occur on the Santa Rosa Plain. These are Burke’s goldfields (*Lasthenia burkei*; state and federal endangered), many-flowered navarretia (*Navarretia leucocephala* ssp. *plieantha*; state and federal endangered), Sebastopol meadowfoam (*Limnanthes vinculans*; state and federal endangered), and Sonoma sunshine (*Blennosperma bakeri*; state and federal endangered).

Botanists (Andrew Georgeades and Amy May) from Sol Ecology completed a special status plant survey. Surveys were performed on March 18, April 13, and May 11, 2021, within the Study Area in accordance with Guidelines for Conducting and Reporting Botanical

Inventories for Federally Listed Plants on the Santa Rosa Plain, California Department of Fish and Wildlife (CDFW) protocol, and California Native Plant Society (CNPS) protocol (Macmillan, 9/25/21; Sol Ecology 7/22/21 in Macmillan 9/25/21). No special-status plant species were found, and the project will not impact special-status plants.

The report recommended a second year of plant surveys be completed in Spring 2022 in accordance with the Santa Rosa Conservation Strategy. Additional surveys were completed on March 24 and April 6, 2022 by Morgan Stickrod (Sol Ecology), with negative findings.

Roadway Realignment

A project condition of approval would require a roadway realignment on Ghilotti Construction property at the southwest corner of Todd Road and Ghilotti Avenue. The County would construct the realignment and associated improvements except for street frontage improvements, which the applicant would construct. A separate Biological Resources Evaluation was prepared for the intersection of Todd Road and Standish Avenue to determine if roadway improvements in this area would impact biological resources.¹⁷

The realignment is within designated critical habitat; however, the existing Ghilotti Construction parking lot at that location "is compacted gravel and therefore constitutes hardscape which would not require compensatory mitigation for dispersal habitat for CTS." (Macmillan 2019).

Significance Level: Less than Significant with Mitigations BIO-1 and BIO-2 Incorporated

Mitigation:

Mitigation Measure BIO-1 (Construction-related): Construction Monitoring for CTS

During construction around the perimeter of the project site, including the roadway realignment at Todd Road and Ghilotti Avenue and permanent fencing if it is installed, avoidance and minimization measures set forth in the Santa Rosa Conservation Strategy shall be followed to avoid incidental take of CTS. Project construction plans must include the following measures:

- A USFWS-approved biological monitor shall be on site each day during wetland restoration and construction (where applicable), and during initial site grading of development sites where CTS have been found.
- The biological monitor shall conduct a training session for all construction workers before work is started on the project.
- Before the start of work each morning, the biological monitor shall check for animals under any equipment such as vehicles and stored pipes. The biological monitor shall check all excavated steep-walled holes or trenches greater than one foot deep for any CTS. If CTS are found, work shall be halted and USFWS and CDFW consulted.

¹⁷ Macmillan, L. "Biological Resource Evaluation, Todd Road and Standish Avenue Intersection Improvements Project, Santa Rosa, CA," December 10, 2019.

Only a USFWS 10(a)(1)(A) permit holder shall be allowed to relocate individuals found under the direction of USFWS or CDFW staff. Work shall not resume until the USFWS Biologist authorizes work to resume.

- An erosion and sediment control plan shall be implemented to prevent impacts of wetland restoration and construction on habitat outside the work areas.
- Access routes and number and size of staging and work areas shall be limited to the minimum necessary to achieve the project goals. Routes and boundaries of the roadwork shall be clearly marked prior to initiating construction/grading.
- All foods and food-related trash items shall be enclosed in sealed trash containers at the end of each day and removed completely from the site once every three days.
- No pets shall be allowed anywhere in the project site during construction.
- A speed limit of 15 mph on dirt roads shall be maintained.
- All equipment shall be maintained such that there will be no leaks of automotive fluids such as gasoline, oils, or solvents.
- Hazardous materials such as fuels, oils, solvents, etc., shall be stored in sealable containers in a designated location that is at least 200 feet from aquatic habitats. All fueling and maintenance of vehicles and other equipment and staging areas shall occur at least 200 feet from any aquatic habitat.
- Grading and clearing shall typically be conducted between April 15 and October 15, of any given year, depending on the level of rainfall and/or site conditions.
- Project areas temporarily disturbed by construction activities shall be re-vegetated with native plants approved by USFWS/CDFW.

Because complete avoidance may not be possible, if construction occurs during the wet season (October 15-June 1), no work shall occur within 24 hours of any forecasted rain event (greater than 40-percent chance). The biologist shall conduct clearance sweeps prior to resuming work following a rain event and work stoppage.

Mitigation Measure BIO-2: Maintain Permanent Barrier (Operational-related). The applicant must maintain the k-rail or another County-approved barrier surrounding the operations area of the project site.

Mitigation Monitoring:

Mitigation Monitoring BIO-1 (Construction-related): If construction or roadway realignment construction is scheduled to occur during the wet season (October 15-June 1), then prior to issuance of a grading permit, the Applicant shall provide or contract with a qualified biologist to implement avoidance and minimization measures set forth in the Santa Rosa Conservation Strategy and as noted above to avoid incidental take of CTS.

Mitigation Monitoring BIO-2 (Operational-related): At all times throughout project operations, the existing k-rail surrounding project site operations must remain in place, or the applicant must receive approval from Permit Sonoma to install a substitute barrier.

Nesting Birds

Existing trees on the perimeter of the project site, plus one oak tree near the proposed roadway realignment, may provide nesting habitat for bird species that are protected by the Migratory Bird Treaty Act of 1918 (MBTA) and the California Fish and Game Code (CFGF) Sections 3503 and 3513, including raptors and other songbird species while nesting. Since typically most birds can fly out of harm's way, project construction (e.g., construction of the sound wall) would not be expected to harm adult birds. However, nesting birds are susceptible to take through disturbance that harms eggs or young. Destruction of or disturbance to an active nest is prohibited. With the implementation of Mitigation Measure BIO-3, the project would result in a less than significant impact on nesting birds protected under the MBTA and CFGF.

Significance Level: Less than Significant with Mitigation Incorporated

Mitigation:**Mitigation Measure BIO-3 (Construction-related): Nesting Bird Avoidance or Conduct Pre-construction Surveys**

The following measure shall be taken to avoid potential inadvertent destruction or disturbance of nesting birds on and near the project site as a result of construction-related vegetation removal and site disturbance:

- a) To avoid impacts to nesting birds, all construction-related activities shall occur outside the avian nesting season (generally prior to February 1 or after August 31). Active nesting is present if a bird is sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest.
- b) If construction-related activities are scheduled to occur during the nesting season (generally February 1 through August 31), a qualified biologist shall conduct a habitat assessment and preconstruction nesting survey for nesting bird species no more than seven (7) days prior to initiation of work. Surveys shall be conducted at the appropriate times of day during periods of peak activity (i.e., early morning or dusk) and shall be of sufficient duration to observe movement patterns. Surveys shall be conducted within 250 feet of the construction limits for nesting non-raptors and 1,000 feet for nesting raptors. If the survey area is found to be absent of nesting birds, no further mitigation would be required. However, if project activities are delayed by more than seven (7) days, an additional nesting bird survey shall be performed.
- c) If pre-construction nesting bird surveys result in the location of active nests, no site disturbance (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, and grading) shall occur until a qualified biologist has established a temporary protective buffer around the nest(s). The buffer must be of sufficient

size to protect the nesting site from construction-related disturbance and shall be established by a qualified ornithologist or biologist with extensive experience working with nesting birds near and on construction sites. Typically, adequate nesting buffers are up to 75 feet from the nest site or nest tree dripline for small birds and up to 1,000 feet for sensitive nesting birds. The nest buffer, where it intersects the project site, shall be staked with orange construction fencing or orange lath staking. Monitoring, by a qualified biologist, shall be required to ensure compliance with the relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented. Active nests found inside the limits of the buffer zones or nests within the vicinity of the project site showing signs of distress from project activity, as determined by the qualified biologist, shall be monitored daily during the duration of the project for changes in breeding behavior. If changes in behavior are observed (e.g., distress, disruptions), the buffer shall be immediately adjusted by the qualified biologist until no further interruptions to breeding behavior are detected. The nest protection buffers may be reduced if the qualified biologist determines in coordination with CDFW that construction activities would not be likely to adversely affect the nest. If buffers are reduced, twice weekly monitoring may need to be conducted to confirm that construction activity is not resulting in detectable adverse effects on nesting birds or their young. The qualified biologist and CDFW may agree upon an alternative monitoring schedule depending on the construction activity, season, and species potentially subject to impact. Construction shall not commence within the prescribed buffer areas until a qualified biologist has determined that the young have fledged or the nest site is otherwise no longer in use.

- d) A report of the findings will be prepared by a qualified biologist and submitted to the County prior to the initiation of construction-related activities that have the potential to disturb any active nests during the nesting season. The report shall include recommendations required for establishment of protective buffers as necessary to protect nesting birds. A copy of the report shall be submitted to the County and applicable regulatory agencies prior to the issuance of a grading permit.

Mitigation Monitoring:

Mitigation Monitoring BIO-3 (Construction-related): The County will not issue permits for ground disturbing activities during the nesting bird season (February 1 through August 31) until after the site has been surveyed by a qualified biologist to ensure that no active bird nest disturbance or destruction will occur as a result of the project.

- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Comment:

The September 2021 Biology Report states the manmade channelized drainages that surround the project site may be subject to the California Department of Fish and Wildlife (CDFW), per Fish and Game Code Section 1600. However, the Report notes the channelized ditches would not be modified as part of the project, and all grading and land disturbance would occur on the interior of the site. No filling, modifications or other alterations would occur in the surrounding ditches. There is no riparian habitat on or adjacent to the project site.

The site would be graded to drain to the east to capture stormwater that could result from larger precipitation events. In addition, a natural vegetated buffer strip would be installed and maintained between a k-rail and the ditch that runs parallel to Ghilotti Avenue. These measures are expected to protect adjacent ditches from site erosion.

Significance Level: Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measure BIO-2, above.

Mitigation Monitoring:

Mitigation Monitoring BIO-2, above.

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

Comment: Stormwater drainage ditches on the periphery of the site are potentially jurisdictional and may contain wetland vegetation seasonally. The project will not directly impact these ditches. Mitigation Measure BIO-2 recommends permanent protection of these ditches from sedimentation that may run off from the project site during storm events.

Significance Level: Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measure BIO-2, above.

Mitigation Monitoring:

Mitigation Monitoring BIO-2, above.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Comment: The project site is not within a significant migratory corridor and does not provide a native wildlife nursery site. It is surrounded by k-rail which prevents CTS from entering the project site, but would not prevent it from moving through the area because there are open grasslands surrounding most of the property.

Significance Level: Less than Significant

Mitigation: none required

Mitigation Monitoring: none required

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

Comment: All activities are expected to comply with local policies and ordinances protection biological resources. Mitigation measures to protect California tiger salamander, water quality, and nesting birds are proposed for the project. (See 3(b) for further discussion of consistency with locally-adopted plans and policies.)

Significance Level: Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measures BIO-1, BIO-2, and BIO-3.

Mitigation Monitoring:

Mitigation Monitoring BIO-1, BIO-2, and BIO-3.

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

Comment:

See item (a) above. The project is within the Santa Rosa Plain Conservation Strategy Area. Avoidance and minimization measures from that plan are included in Mitigation Measure BIO-1 for the roadway realignment, although the likelihood of impacts to the California tiger salamander have been determined to be low. Work on the project site has been found not to impact California tiger salamander or rare plants, as explained under a), above. There are no

other adopted habitat conservation plans or natural community conservation plans covering the project site.

Significance Level: Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measures BIO-1.

Mitigation Monitoring:

Mitigation Monitoring BIO-1.

5. CULTURAL RESOURCES:

Would the project:

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

Comment:

Permit Sonoma staff referred the project application to the Northwest Information Center - Sonoma State University (NWIC) for review and recommendations. The NWIC letter noted that *"although the vicinity of your project area is considered sensitive for archaeological resources, we are not recommending a cultural resource study at this time."*¹⁸ There would be no impacts to historical resources.

Significance Level: No Impact

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

Comment:

On February 6, 2017, Permit Sonoma staff referred the project application to Native American Tribes within Sonoma County, and received no responses. The NWIC letter indicated that no cultural resource study was necessary, and the impact on archaeological resources would be less than significant.

The proposed project would be required to comply with the grading ordinance, (County Code Section 11-14-050), which includes provisions for the protection of human remains and archaeological resources during grading activities. Section (c) below discusses the grading ordinance provisions.

¹⁸ Northwest Information Center. Email to Peter Lange, "RE: Project review – file number UPE01-0181" March 8, 2017

Significance Level: Less than Significant Impact

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

Comment:

Local tribes did not respond to the project referral, and the NWIC letter did not identify any burial sites in the project area. However, the site would be disturbed during construction activities related to the sound wall (and also the project condition of approval for the intersection realignment), which could uncover human remains. Sonoma County Code Section 11-14-050 provides procedures for protection of human remains, including notifying the County Coroner and complying with all state law requirements (Health and Safety Code section 7050.5 and Public Resources Code section 5097.98) to ensure proper disposition of the human remains or suspected human remains, including those identified to be Native American remains. Implementation of this standard County policy would ensure that this impact would be less than significant.

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

Significance Level: Less than Significant Impact

6. ENERGY:

Would the project:

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

Comment:

Energy would be consumed during construction and operation of the proposed project. Energy in the form of gasoline and diesel fuel would be required during construction of new facilities (e.g., the sound wall and berm, and roadway realignment). The energy required for these activities is a necessary component of construction and would not be used in an inefficient manner. Construction would consume energy from gasoline and diesel fuels, and the proposed project would include measures that would reduce the amount of fuel

consumption during construction, such as minimizing idling time of diesel-powered construction equipment (see Mitigation AIR-1 in Section 3, Air Quality). Due to the relatively small size of this project (e.g., no buildings are proposed), construction is not expected to result in a significant impact for demand on Bay Area suppliers of gasoline and diesel fuels; therefore, energy impacts would be less than significant.

The proposed project would consume energy during its year-round operation. Project operation would not increase energy usage because the construction yard is currently operating, and energy use would be expected to remain approximately the same after new construction. Energy use could decrease because there would no longer be nighttime lighting onsite. Energy use from the project would not increase from existing conditions. There are no structures currently onsite, and the project is not proposing any structures besides a sound wall and berm. These structures would not consume energy during operation. Project operation would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy.

Significance Level: Less than Significant Impact

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

Comment:

There are no state or local energy plans applicable to the proposed project. As described in (a) above, the project does not propose energy-consuming structures.

Significance Level: No Impact

7. GEOLOGY AND SOILS:

Would the project:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Comment:

The project site is not within a fault hazard zone as defined by the Alquist-Priolo fault maps.¹⁹ The site is just over three miles west of the Rogers Creek Fault Zone, in an area that has potential for earthquake damage. However, adherence to the seismic design guidelines of the California Building Code (CBC) would ensure that impacts related to earthquakes would remain less than significant.

Significance Level: Less than Significant Impact

ii. Strong seismic ground shaking?

Comment:

All of Sonoma County is subject to seismic shaking that would result from earthquakes along the San Andreas, Healdsburg-Rodgers Creek, and other faults. The design and construction of new structures are subject to engineering standards of the California Building Code (CBC), which consider soil properties, seismic shaking, and foundation type. Application of geotechnical evaluation techniques and appropriate engineering practices would reduce risks of potential injury and damage resulting from seismic activity. Project conditions of approval require that building permits be obtained for all construction and that all construction activities, including earthwork, grading, trenching, backfilling and compaction operations, shall be conducted in accordance with Sonoma County Code Chapter 11 to ensure that the project meets standard seismic and soil test/compaction requirements. As a matter of practice and state law, all construction activities would be required to meet the California Building Code regulations for seismic safety, including designing all earthwork, cuts and fills, drainage, pavements, utilities, foundations and structural components in conformance with the specifications and criteria contained in the project final geotechnical report, which shall be completed and submitted to Permit Sonoma prior to project approval. Standard County development procedures include review and approval of construction plans prior to the issuance of a building/grading permit.

In addition, as required by the building code, the geotechnical engineer would be required to submit an approval letter for the engineered grading plans prior to issuance of the grading permit. Also, prior to final issuance of the grading permit and the acceptance of the improvements or issuance of a certificate of occupancy, the geotechnical engineer would be required to inspect the construction work and certify to Permit Sonoma that the improvements have been constructed in accordance with the geotechnical specifications. All work would be subject to inspection by Permit Sonoma for conformance with all applicable code requirements and approved improvement plans.

¹⁹ Sonoma County General Plan 2020, Public Safety Element, Figure PS-1b, Earthquake Fault Hazard Areas, <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/General-Plan/Public-Safety--Earthquake-Fault-Hazard-Areas/>, accessed 5/14/20.

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

Significance Level: Less than Significant Impact

iii. Seismic-related ground failure, including liquefaction?

Comment:

Strong ground shaking can result in liquefaction, which is the sudden loss of sheer strength in saturated sandy material, resulting in ground failure. Areas of Sonoma County most at risk of liquefaction are along San Pablo Bay and in alluvial valleys. According to the General Plan Public Safety Element, Figure PS-1c (Liquefaction Hazard Areas), the project site is classified as having very low susceptibility to liquefaction.²⁰ Regardless, all structures would be required to meet building permit requirements, including seismic safety standards and soil test/compaction requirements.

Significance Level: Less than Significant Impact

iv. Landslides?

Comment:

Steep slopes characterize much of Sonoma County, particularly the northern and eastern portion of the County. Where these areas are underlain by weak or unconsolidated earth materials, landslides are a hazard. According to General Plan Public Safety Element, Figure PS-1d, the project site is located in a Class 0 Landslide Hazard Area, which means the area is not highly susceptible to landslides.²¹ All structures would be required to meet County building permit requirements, including seismic safety standards and soil test/compaction requirements.

Significance Level: Less than Significant Impact

²⁰ Sonoma County General Plan 2020, Public Safety Element, Figure PS-1c, Liquefaction Hazard Areas, <http://sonomacounty.ca.gov/PRMD/Long-Range-Plans/General-Plan/Public-Safety-Liquefaction-Hazard-Areas/>, accessed 5/14/20.

²¹ Sonoma County General Plan 2020, Public Safety Element, Figure PS-1d, Deep-Seated Landslide Hazard Areas, <http://sonomacounty.ca.gov/PRMD/Long-Range-Plans/General-Plan/Public-Safety-Deep-seated-Landslide-Hazard-Areas/>, accessed on 05/14/20

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

Comment:

The project includes grading activities that require the issuance of a grading permit per County Code Section 11.04.010. The project proposes a fill of approximately 60,000 cubic yards (CY) (for the earth berm) and stockpile of approximately 45,000 CY. Improper grading, both during and post construction, has the potential to increase the volume of runoff from a site which could have adverse downstream flooding and further erosional impacts, and increase soil erosion on- and off-site which could adversely impact downstream water quality.

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

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

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

The County-adopted grading ordinances, and standards and related conditions of approval which enforce them, are specific and also require compliance with all standards and regulations adopted by the State and Regional Water Quality Control Board, such as the Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, Low Impact Development (LID), and any other adopted BMPs. Therefore, no significant adverse soil erosion or related soil erosion water quality impacts would be expected given the mandated conditions and standards that need to be met. For further discussion of related water quality issues, please see Section 10, Hydrology and Water Quality.

BMPs employed onsite include drop inlet filters and oil booms, and straw wattles around drop inlets. On the west side of Ghilotti Avenue, storm water is conveyed through a surface drainage system, including open ditches; BMPs here include vegetated areas, restrictions on vehicle traffic, and k-rails around the perimeter of the construction yard. Application of these BMPs, as well as compliance with SUSMP and LID BMPs, reduce risk of erosion from project operation and construction. Impacts would be less than significant.

Significance Level: Less than Significant Impact

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

Comment:

The site would be subject to seismic shaking and other geologic hazards described in Sections 7.a.i through 7.a.iv, above. However, as described in those sections, standard County Code and building requirements, combined with conformance with standard CBC and other applicable state and local regulations (all of which shall be required as conditions of approval for the project), would reduce potential soil stability impacts to less than significant.

Significance Level: Less than Significant Impact

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

Comment:

Table 18-1-B of the Uniform Building Code is an index of the relative expansive characteristics of soil as determined through laboratory testing. The project site contains soils that range from low to moderate potential for shrink-swell, which could result in soil expansion. The final geotechnical report required as part of standard County development procedures (see 7.a.ii) would include an analysis of expansive soil hazards and recommended stabilization measures. With implementation of these measures, combined with conformance with standard CBC and other applicable state and local regulations (all of which shall be required as conditions of approval for the project), potential hazards from expansive soils would be less than significant.

Significance Level: Less than Significant Impact

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

Comment:

A report from BC Engineering Group²² determined that onsite soils are unlikely to pass percolation testing and would not support a code compliant septic system for a bathroom. The soils onsite are Clear Lake Clay and Wright Loam, which are both drainage class D.²³ See section 19, Utilities and Service Systems, for a discussion on an alternative solution for project wastewater disposal.

Significance Level: Less than Significant Impact

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

Comment:

The Geological Map of California indicates that the project site contains marine and nonmarine (continental) sedimentary rocks underlain by older alluvium, lake, playa, and terrace deposits.²⁴ Per an email from the University of California Museum of Paleontology (UCMP), an on-line paleontological resources record search through the database indicated that there are no known fossil localities that have been previously identified on the project site or within a one-mile radius.²⁵

The project would be required to comply with the County grading ordinance (Section 11-14-050), as discussed in Section 5. Cultural Resources. This includes provisions for the protection of human remains, archaeological resources, and paleontological resources during grading activities in the project conditions of approval (e.g., cease ground-disturbing activities immediately if paleontological resources are encountered, and notify Permit Sonoma).

Significance Level: Less than Significant Impact

8. GREENHOUSE GAS EMISSIONS:

Would the project:

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

²² BC Engineering. November 2019. Septic Feasibility Evaluation on APN 134-171-051 for Septic Easement Potential to Serve APN 134-171-050

²³ Carlile Macy. November 30, 2016. Preliminary Standard Urban Storm Water Mitigation Plan (SUSMP) for 304 Todd Road.

²⁴ California Department of Conservation. Geologic Map of California, 2010.
<https://maps.conservation.ca.gov/cgs/gmc> accessed 5/19/20

²⁵ University of California, Berkeley. Holroyd, Patricia email to Robert Templar "Request for Paleontological Search in Sonoma County" 8/2/2018

Comment:

Global greenhouse gas emissions contribute to climate change, but individual projects do not generate enough GHG emissions to influence global climate change. The analysis of GHG emissions is, by nature, a cumulative analysis focused on whether an individual project's contribution to global climate change is cumulatively considerable.

The California Air Resources Board (CARB) is the lead agency for implementing Assembly Bill (AB) 32, the California Global Warming Solutions Act adopted by the Legislature in 2006. AB 32 (2006) combined with SB 32 (2016) requires the CARB to prepare a Scoping Plan containing the main strategies that would be used to achieve the State's GHG emissions reductions targets, which in general are:

- Reduce statewide GHG emissions to 1990 levels by 2020;
- Reduce GHG emissions to 40 percent below 1990 levels by 2030; and
- Reduce GHG emissions to 80 percent below 1990 levels by 2050

CARB prepares an annual statewide GHG emissions inventory using regional, state, and federal data sources, including facility-specific emissions reports prepared pursuant to the state's Mandatory GHG Reporting Program. The statewide GHG emissions inventory helps CARB track progress towards meeting the state's AB 32 GHG emissions target of 431 million metric tons of carbon dioxide (CO₂) equivalents (MTCO_{2e}), as well as to establish and understand trends in GHG emissions. According to CARB's most recent GHG emissions inventory (2017 edition), GHG emissions have generally decreased over the last decade, with 2015 levels (440 million MTCO_{2e}) approximately 10 percent less than 2004 levels (488 million MTCO_{2e}). The transportation sector (165 million MTCO_{2e}) accounted for more than one-third (approximately 37.5 percent) of the state's total GHG emissions inventory (440 million MTCO_{2e}) in 2015, while electric power generation accounted for approximately one-fifth (19 percent) of the state's total GHG emissions inventory.

The County concurs with and utilizes as County thresholds the BAAQMD recommended GHG significance thresholds. The County also concurs that these thresholds are supported by substantial evidence for the reasons stated by BAAQMD staff. For projects other than stationary sources, the GHG significance threshold is 1,100 MTCO_{2e} or 4.6 metric tons of CO_{2e} per service population (residents and employees) per year.

The potential sources of greenhouse gas emissions from the project would be from 1) construction activities (i.e., the sound wall) and 2) project operations including use of on-site off-road diesel-powered equipment to process material and truck traffic associated with the facility. The GHG emissions from these sources were modeled using CalEEMod and are reported in Table 7 below. Annual emissions from the project would be 518.6 metric tons (MT) per year.

Table 7. Project GHG Emissions (on- and off-site)

	Pollutant Emissions (Metric Tons)
	GHG
Project construction activities (sound wall)	48
Construction GHG emissions amortized over 30 year "project lifetime"	1.6
Typical Operation (Yard + Crushing + Trucks)	517
Total Annual Project GHG Emissions (amortized construction + operations)	518.6
BAAQMD Significance Threshold	1,100
<i>Exceeds BAAQMD Significance Threshold?</i>	No
Source: Illingworth & Rodkin, Inc., 2018.	

As noted above, the BAAQMD CEQA Air Quality Guidelines recommend a threshold of 1,100 MT per year, which is used by the County to evaluate the significance of greenhouse gas emissions from projects. The project, therefore, would not generate greenhouse gas emissions that would have a significant impact on the environment, nor conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

As shown in Table 7, the proposed project would be below the BAAQMD operational significance threshold. The BAAQMD does not maintain GHG significance thresholds for construction emissions; however, construction GHG emissions are usually amortized over the lifetime of a project (assumed to be 30 years) and included in a project's estimate of annual operational GHG emissions. As discussed in Section 3, Air Quality, the County is including BAAQMD-recommended basic construction measures into the project as **Mitigation Measure AIR-1**, which would reduce fuel combustion and GHG emissions by requiring equipment to be properly maintained and limiting idling emissions. GHG emissions associated with construction activities are not anticipated to be substantial and would not change the significance conclusion pertaining to GHG emissions.

Significance Level: Less than Significant with Mitigation Incorporated

Mitigation Measure: See **Mitigation Measure AIR-1**, in Section 3.

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

Comment:

The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG. As described in Section 3.a, Air Quality, and Section 8.a above, the proposed project would be consistent with the BAAQMD's 2017 Clean Air Plan, the BAAQMD's CEQA Guidelines, and the AB32 Scoping

Plan. Therefore, because project-generated GHG emissions would be below the BAAQMD threshold, the project is also considered to be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The impact would be less than significant. As a standard condition of approval, the County requires that projects submit a greenhouse gas reduction plan to reduce GHGs beyond statutory requirements to achieve compliance with General Plan GHG reduction goals.

Significance Level: Less than Significant Impact

9. HAZARDS AND HAZARDOUS MATERIALS:

Would the project:

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

Comment:

Construction of the project, as well as ongoing maintenance over time, may involve the intermittent transport, use, and disposal of potentially hazardous materials, including fuels and lubricants, paints, solvents, and other materials commonly used in construction and maintenance. During construction activities, any on-site hazardous materials that may be used, stored, or transported would be required to follow standard protocols (as determined by the U.S. EPA, California Department of Health and Safety, and Sonoma County) for maintaining health and safety. The stockpile and recycled materials onsite do not contain hazardous materials.

Proper use of materials in accordance with local, state, and federal requirements, and as required in the construction documents, would minimize the potential for accidental releases or emissions from hazardous materials. In addition, as standard County procedure, project construction contracts are required to comply with Sonoma County Fire Code regulations for storage of flammable liquids and Sonoma County Municipal Code regulations related to hazardous materials management (protection of surface waters pursuant to Caltrans Standard Specifications, or functional equivalent). Project construction contracts are also required to specify procedures in the event of a spill of hazardous materials (e.g., contractor responsible for immediately calling emergency number 9-1-1 to report spill, taking appropriate actions to contain spill to prevent further migration of hazardous materials, contacting County to verify appropriate clean-up procedures). Because project use, storage, transport, or disposal would be subject to applicable local, state, and federal regulations, and these regulations (including existing General Plan policies) specify standards and protocols for safe transport, use, and disposal of hazardous materials, the potential threat to public health and safety or the environment from hazardous materials would be less than significant.

Significance Level: Less than Significant Impact

- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Comment:

As mentioned in 9.a above, the project may occasionally transport hazardous materials, but this would not create accident conditions, as materials would be stored in limited quantities onsite for limited periods of time (e.g., the project would not manufacture toxic chemicals), and hazardous materials are subject to existing laws, regulations, and protocols. The project would not create a significant hazard due to accident conditions, and impacts would be less than significant.

Significance Level: Less than Significant Impact

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

Comment:

The project site is located within a quarter mile of the New Directions School, which is approximately 0.18 miles north of the project site. The next closest school is Bellevue Elementary School, about one mile from the project site. Per 9.a above, hazardous materials handling would be subject to existing local, state, and federal laws, regulations, and protocols. Per 9.b above, the proposed project would not create accident conditions that could result in the release of hazardous materials. No hazardous emissions would result from the project, and the impact to schools would be less than significant.

Significance Level: Less than Significant Impact

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Comment:

The project is located in an area with other industrial uses nearby, and there are multiple sites that appear on the databases listed below. While the sites are industrial, there are no hazardous materials sites within or adjacent to the project site, based on a review of the following databases on May 18, 2020:

1. The State Water Resources Control Board GeoTracker database,²⁶
2. The Department of Toxic Substances Control EnviroStor database,²⁷ and
3. The California Integrated Waste Management Board Solid Waste Information System (SWIS).²⁸

The project site is listed on the GeoTracker database for a former leaking underground storage tank. In March 1992, three underground storage tanks were removed from the site. One of the tanks held 2,000 gallons of gasoline, one 8,000 gallons of diesel fuel, and one 7,500 gallons of diesel fuel. Soil sample results indicated that a release had occurred and, subsequently, groundwater monitoring wells were installed. After testing, a “no further action letter” was issued on September 8, 2011.²⁹ The project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5,³⁰ and the impact would be less than significant.

Significance Level: Less than Significant Impact

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

Comment:

The project site is not within the Sonoma County Airport Referral area as designated by the Sonoma County Comprehensive Airport Land Use Plan. The Charles M. Schulz Sonoma County Airport is approximately 10 miles north-northwest of the project site.

Significance Level: No Impact

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

Comment:

The project would not impair implementation of, or physically interfere with, the County’s adopted emergency operations plan. There is no separate emergency evacuation plan for the County. The project would not result in a significant change in existing circulation

²⁶ State Water Resources Control Board. GeoTracker Database, <https://geotracker.waterboards.ca.gov>, accessed on 05/18/20.

²⁷ Department of Toxic Substances Control. EnviroStor Database, <http://www.envirostor.dtsc.ca.gov/public/>, accessed on 05/18/20.

²⁸ The California Integrated Waste Management Board of Solid Waste Information System (SWIS), <https://www2.calrecycle.ca.gov/SWFacilities/Directory/Search.aspx>, accessed on 05/18/20.

²⁹ SCS Engineers. 7/1/2015. Storm Water Pollution Prevention Plan.

³⁰ California Environmental Protection Agency, Cortese List Data Resources, <http://www.calepa.ca.gov/SiteCleanup/CorteseList/default.htm>, accessed on 05/14/20.

patterns and would have no effect on emergency response routes. In addition, as a matter of practice and state law, the applicant is required to submit a written *Fire Safety and Evacuation Plan* (pursuant to California Fire Code Sections 403 and 404) for Sonoma County Fire review and approval, prior to approval of a grading permit. This plan would include, but not be limited to, fire safety, medical emergencies, and evacuations, and would also describe provisions for fire watch and medical personnel. The plan would be subject to re-evaluation by County Fire at any time, when requested in writing by the fire code official. Based on this uniformly applied regulatory process, the project would have a less than significant impact on emergency response and evacuation.

Significance Level: Less than Significant Impact

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

Comment:

According to the Wildland Fire Hazard Areas mapping (Figure PS-1g) of the Sonoma County General Plan 2020,³¹ the project is located within a Local Responsibility Area (LRA). The County's GIS tool indicates that the site is classified as Non-wildland/Non-Urban area, as well as Moderate Fire Hazard Severity Zone in the eastern side of the site. The General Plan Public Safety Element (p.PS-14) defines the Zone, "*The Moderate Fire Hazard Severity Zone includes a) wildland areas of low fire frequency supporting modest behavior; and b) developed/urbanized areas with a very high density of non-burnable surfaces and low vegetation cover that is highly fragmented and low in flammability.*"

While project construction and operation could expose people or structures to increased fire hazards, the project site is in an area of limited vegetative cover and no topographic features to channel fire. The project would be required to comply with Sonoma County Fire Safety Standards (Sonoma County Code Chapter 13). Additionally, the project would be required to conform to State Building Code requirements (Chapter 7A), including use of ignition-resistant construction methods and materials, minimum fire-resistance construction standards, and minimum fire separation distances. Also, pursuant to Public Resource Code 4442, the Applicant would be required to include a note on all construction plans that internal combustion engines be equipped with an operational spark arrester, or the engine must be equipped for the prevention of fire. Project compliance with these standard County and state requirements would reduce risks from wildland fires on people and structures to a less than significant level.

Significance Level: Less than Significant Impact

³¹ Sonoma County General Plan 2020, Public Safety Element, Wildland Fire Hazard Areas, Figure PS-1g, <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/General-Plan/Public-Safety-Wildland-Fire-Hazard-Areas/>, accessed 5/14/20.

10. HYDROLOGY AND WATER QUALITY:

Would the project:

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

Comment:

The project site is not served by a public water provider and is not served by a private well. Current and future operations onsite include equipment storage, stockpiling of construction materials and dirt, and stockpiling and processing of asphalt grindings, rock, and broken concrete for recycling. No new impervious surface is proposed, all existing and future runoff would be directed into the existing vegetated swales surrounding the site, and no new drainage is proposed. The project could affect the quantity and/or quality of storm water run-off by pollutants such as oil, grease, and chemicals from stored equipment, or sediment from the stockpiled materials to nearby water bodies and could affect underground sources of drinking water.

Watershed/Tributaries: The project is located in the Upper Laguna de Santa Rosa sub-watershed of the Mark West watershed, part of the larger Russian River Hydrologic Unit. Per the project-specific Standard Urban Stormwater Mitigation Plan (SUSMP), onsite stormwater drains from the site into the following bodies of water (in order of receipt): existing onsite swales, Bellevue Wilfred Channel, Laguna de Santa Rosa, Mark West Creek, and lastly, the Russian River.³² The Russian River is listed by the State Water Resources Control Board (SWRCB) and North Coast Regional Water Quality Control Board (NCRWQCB) as impaired for sediment, bacteria, and dissolved oxygen. Tributaries to the Laguna de Santa Rosa are also listed as impaired under section 303(d) of the Clean Water Act (CWA), and several Total Maximum Daily Load (TMDL) projects are underway to clean up 303(d) listed water bodies.³³

Wastewater Discharge: There would be no domestic wastewater discharge from the project, as there is no existing or proposed sewer or septic connection. However, the applicant would be required to comply with the Industrial General Permit (IGP) requirements of the North Coast Regional Water Quality Control Board for the proposed use, and shall be required to provide documentation of compliance to Permit Sonoma prior to issuance of any grading or building permit.

Construction: Because project construction would disturb one or more acres of soil, the project would be required to file a Notice of Intent (NOI) package for coverage under the SWRCB General Permit for Discharges of Storm Water Runoff Associated with Construction

³² Carlile Macy. 11/30/2016. Preliminary Standard Urban Stormwater Mitigation Plan.

³³ SWRCB. TMDL Integrated Report, 2014-2016. "303(d) List and 305(b) Report,"

https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml accessed 5/20/20

Activity (Order No. 2009-0009-DWQ; "General Permit"). The General Permit requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which in addition to other requirements must list Best Management Practices (BMPs) to be used to protect storm water, including covering disturbed areas with mulch, temporary seeding, soil stabilizers, binders, fiber rolls or blankets, temporary vegetation, and permanent seeding.³⁴ Standard County development procedures require applicants to submit the General Permit to the County prior to issuance of any building/grading permit for a proposed project.

Storm Water Runoff/Grading and Drainage: The project site is located in an area subject to the NCRWQCB Municipal Separate Storm Sewer Systems (MS4) Permit and would be required to meet NCRWQCB post-construction BMP standards. The project includes a site-specific SUSWMP that lists BMPs, introduced in the SWPPP. The total amount of impervious area would not increase after development; therefore, the design requirement of volume capture is not required for this project.³⁵ The total drainage area from the site into the existing vegetation swales is 361,718 square feet.

In addition, the project would be required to comply with County storm water quality requirements (County Code Chapter 11A), which would include incorporating post-construction storm water Low-Impact Development (LID) BMPs into the drainage design of the project to mitigate impacts to the quality and quantity of storm water discharges from the project site. Application of these standard County and State stormwater and water quality requirements would reduce potential impacts to less than significant.

Significance Level: Less than Significant Impact

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

Comment:

The project lies within the Santa Rosa Plain Groundwater Basin, which is a groundwater availability Zone 1. Per the SUSMP, there would be no new outfalls built as part of the project, since the existing and future runoff would be directed into the existing vegetated swales surrounding the site. The project would not decrease groundwater supplies or interfere with groundwater recharge, as there is no new impervious surface proposed, and no water would be drawn for domestic use.³⁶

³⁴California State Water Resources Control Board, Storm Water Program, DWQ Construction General Permit Fact Sheet, p. 46;
https://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/constpermits/wqo_2009_0009_factsheet.pdf, accessed 5/20/20.

³⁵ Carlile Macy. 11/30/2016. Preliminary Standard Urban Stormwater Mitigation Plan.

³⁶ Carlile Macy. 11/30/2016. Preliminary Standard Urban Stormwater Mitigation Plan.

The applicant is proposing to plant trees that would need an irrigation system. Per the Irrigation plan, the applicant's Maximum Applied Water Allowance (MAWA) would be 44,104 gallons annually. The project is estimated to need 36,302 gallons for irrigation annually, which is within the allowable amount.³⁷ The irrigation system's connection has not yet been determined but could possibly include an onsite water supply from tanks. No interference to groundwater supplies or recharge would occur with project implementation.

Significance Level: No Impact

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

Comment:

There are no blue line streams on the site. The closest stream is a drainage ditch, approximately 800 feet east of the project site. Surface drainage from the project site flows either east into a drainage ditch that parallels Ghilotti Avenue or flows west into a drainage ditch that parallels the material storage yard. Both drainage ditches flow south, then west into the Colgan Creek Flood Control Channel.³⁸

Project operation involves stockpiling of construction aggregate materials, rock crushing, and construction equipment storage, which have the potential to result in erosion or siltation. The project proposes fill of approximately 60,000 cubic yards (CY) (for the earth berm) and a stockpile of approximately 45,000 CY, requiring a General Construction Permit. As discussed in Section 10.a above, compliance with the County Grading ordinance would reduce the soil erosion and sediment delivery impacts from the site, and the SUSMP lists BMPs that would be incorporated into project operation. For further discussion of soil impacts, please see Section 7, Geology and Soils.

³⁷ Carlile Macy. January 2018. Landscape + Irrigation + Notes, Todd Road, Santa Rosa, CA.

³⁸ SCS Engineers. 7/1/2015. Storm Water Pollution Prevention Plan.

The SWPPP outlines the following erosion and sediment control measures that would be implemented onsite in accordance with the General Permit:

- Implement effective wind erosion controls;
- Provide effective stabilization for all disturbed soils and other erodible areas prior to a forecasted storm event;
- Maintain effective perimeter controls and stabilize all site entrances and exits to sufficiently control discharges of erodible materials from discharging or being tracked offsite;
- Divert run-on and storm water generated from within the site away from all erodible materials; and
- If sediment basins are implemented, ensure compliance with the design storm standards of the General Permit.³⁹

The SUSMP lists particular BMPs introduced in the SWPPP that would be incorporated into the project, such as:

- Low Impact Development (LID) techniques such as interceptor trees and vegetated buffer strips; and
- Priority BMPs, including roadside bioretention and infiltration trenches⁴⁰

Temporary construction BMPs (including erosion control measures) would be required to minimize and control siltation during the construction period. Other adopted water quality BMPs include design standards mentioned in 10.a that include storm water treatment devices based on filtering, settling, or removing pollutants. The project would not increase runoff or soil erosion compared to existing conditions.

Post-construction storm water BMPs must be installed per approved plans and specifications and working properly prior to finalizing the grading permits. Post-construction storm water BMPs shall be designed and installed pursuant to the adopted Sonoma County BMP Guide. The BMPs would prevent the alteration of site drainage or an increase in surface runoff, and would also avoid flooding. BMPs employed onsite include drop inlet filters and oil booms, and straw wattles around drop inlets. On the west side of Ghilotti Avenue, storm water is conveyed through a surface drainage system, including open ditches; BMPs here include vegetated areas, restrictions on vehicle traffic, and k-rails around the perimeter of the construction yard. Application of these BMPs as well as compliance with SUSMP and LID BMPs would reduce risk of erosion from project operation and construction. Impacts to drainage patterns would be less than significant.

Significance Level: Less than Significant Impact

³⁹ SCS Engineers. 7/1/2015. Storm Water Pollution Prevention Plan.

⁴⁰ Carlile Macy. 11/30/2016. Preliminary Standard Urban Stormwater Mitigation Plan.

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

Comment:

According to the FEMA Flood Maps, the project is outside of the 100-year Flood Hazard Area and is listed as “an area of minimal flood hazard.”⁴¹ According to Sonoma General Plan Figure PS-1f,⁴² the project site is not located in an area that would be subject to flooding as a result of levee or dam failure. The project site is not located in a tsunami or seiche zone.

Significance Level: No Impact

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

Comment:

The project is located in the Santa Rosa Plain groundwater basin managed by the Santa Rosa Plain Groundwater Sustainability Agency, in accordance with the Sustainable Groundwater Management Act. The Agency is currently developing a Groundwater Sustainability Plan that must be completed by 2022 and would provide a regulatory framework for managing groundwater use. Until the plan is finalized (at which time, future projects will be evaluated accordingly), there is no obstruction or conflict with a sustainable groundwater management plan.

Significance Level: No Impact

11. LAND USE AND PLANNING:

Would the project:

a) Physically divide an established community?

Comment:

The project involves construction of a sound wall and earth berm on the property. However, the project does not require removal of a primary access route (such as a road or bridge) and does not impair mobility within an established community or between a community and outlying areas. The project would not physically divide a community.

⁴¹ Federal Emergency Management Agency. FEMA Flood Map Service Center, <https://msc.fema.gov/portal/search?AddressQuery=304%20todd%20road%2C%20santa%20rosa%2C%20CA> accessed 5/20/2020.

⁴² Sonoma County. General Plan 2020 Safety Element. “Dam Failure Inundation Hazard Areas, Figure PS-1f,” <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/General-Plan/Public-Safety-Dam-Failure-Inundation-Hazard-Areas/> accessed 5/20/2020.

Significance Level: No Impact

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

Comment:

The project would not conflict with any applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect, including the South Santa Rosa Area Plan, Sonoma County General Plan, and Sonoma County Zoning Ordinance.

The South Santa Rosa Area Plan includes broad goals and policies related to the economic importance (in particular, *"Require compatibility with existing and projected surrounding land uses"*),⁴³ and visual and natural resource preservation standards that apply to projects in the area. As also discussed in Section 1, Aesthetics, the project includes design features (subject to final design review and approval) that would be consistent with South Santa Rosa Area Plan standards from an aesthetic perspective. From a related, land use perspective, the project also would be consistent, including the following features:

- The project would not be developed on a skyline, nor would any structure be proposed in a visual or scenic corridor, riparian corridor, or unique biotic resource area.
- There are no trees onsite, but adjacent to the site along Todd Road and Ghilotti Avenue, there are intermittent trees. The applicant has provided a landscaping plan and would plant approximately 50 trees onsite.
- The project would be designed to be harmonious with the local setting and neighboring development and would be subjected to design review. (See Section 1, Aesthetics, for further discussion).
- The project would not have a negative impact on agriculture lands. (See Section 2, Agricultural and Forest Resources, for further discussion).
- Parking would not be allowed on any public streets.
- Minimum setbacks would be consistent with the South Santa Rosa Area Plan: *"Front and Rear: Minimum of 20 feet from property line adjacent to residential development. Side: minimum of 10 feet from the property line adjacent to residential development."*⁴⁴

⁴³Sonoma County. May 1982, updated September 23, 2008. South Santa Rosa Specific Plan, p. 17.

⁴⁴ Sonoma County. May 1982, updated September 23, 2008. South Santa Rosa Specific Plan, p. 52.

The proposed project would be substantially consistent with the goals, policies, and objectives in the Sonoma County General Plan 2020 related to avoiding or mitigating an environmental effect, including:

- The project's General Plan land use designation (LI-Limited Industrial) is defined in the South Santa Rosa Area Plan (p. 36) as: *"[L]ight industrial in combination with heavy commercial land uses including such uses as automobile sales and service establishments, mobile home sales and service establishments, cabinet shops, truck terminals, contractors yards, landscaping materials yards, light assembly plants, and light distributing plants."* The project use is consistent with the LI-Limited Industrial land use designation.
- Wastewater (General Plan Policy LU-8): The project would comply County regulations to minimize storm water, surface water, and groundwater pollution, including utilization of BMPs.

The project would also be consistent with Sonoma County Municipal Code Article 50 (M3 Limited Rural Industrial District.) to *"implement the provisions of Section 2.4.2 of the general plan by providing area for land extensive industrial development or industrial development outside of designated urban service areas which is limited in scale by such factors as lack of public services, incompatible adjacent land use or adverse environmental impacts."*

Project approval would result in the applicant obtaining a Use Permit that will bring the existing unpermitted facility into compliance with current Sonoma County regulations. The project would not conflict with any applicable land use plan adopted to avoid or mitigate an environmental effect, including the Sonoma County General Plan and zoning ordinance.

Significance Level: No Impact

12. MINERAL RESOURCES:

Would the project:

- a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

Comment:

Sonoma County has adopted the Aggregate Resources Management Plan, which identifies aggregate resources of statewide or regional significance (areas classified as MRZ-2 by the State Geologist); the project site and surrounding area have not been designated for

extraction.⁴⁵ The project is located in an area classified as MRZ-3: *Areas containing known mineral occurrences of undetermined mineral resource significance*.⁴⁶ Additionally, the project would not result in the loss of availability of mineral resources because the project does not propose to develop mineral resources.

Significance Level: Less than Significant Impact

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

Comment:

The project would not result in the depletion of any locally important mineral resource. The project is located in an area classified as *MRZ-3: Areas containing known mineral occurrences of undetermined mineral resource significance*, but no extraction or development is proposed in regard to mineral resources. The closest rock quarry is the Stony Point Rock Quarry, which is four miles to the south, located on the western outskirts of Cotati. The project would have no impact on this operation.

Significance Level: No Impact

13. NOISE:

Would the project result in:

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

Comment:

To assess project noise, an environmental noise assessment⁴⁷ was prepared for the applicant that assessed existing noise levels in the project vicinity. The assessment evaluated project-generated noise and vibration levels associated with the existing contractor's equipment storage site, rock material stockpile location, and asphalt and concrete materials processing, plus the proposed construction of a 14-foot high sound wall and a 25-foot high earthen berm. The noise and vibration analysis was based on applicable

⁴⁵ Sonoma County. Aggregate Resources Management Plan. Available online: <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Aggregate-Resource-Management/Maps-and-Diagrams/> accessed 5/14/20

⁴⁶ California Department of Conservation. Mineral Land Classification of Sonoma County for Class II Base Aggregate, March 2005. Available online: <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc> accessed 5/14/20

⁴⁷ "304 Todd Road Project Environmental Noise and Vibration Assessment, Sonoma County, California," prepared by Illingworth & Rodkin, Inc., September 5, 2018.

County standards and considered adjacent noise-sensitive land uses (residences). The following discussion summarizes the key results, findings, and recommendations of the noise assessment. Refer to Appendix B for the full noise assessment, which includes a description of key noise concepts, terms, applicable regulations, and detailed site noise information.

County noise standards (as indicated in Table NE-2 of the General Plan) establish maximum allowable exterior noise exposures of 50 dBA in the daytime (7:00 AM to 10:00 PM) and 45 dBA in the nighttime (10:00 PM to 7:00 AM), as measured using the L50 value (the value exceeded 50 percent of the time, or 30 minutes in any hour--i.e., this is the median noise level).

General Plan Land Use Compatibility

Based on a review of the proposed project, noise levels were measured (1) at the project site; (2) at noise-sensitive land uses (1 residence) located to west, of the project site (Site LT-1); and (3) at noise sensitive land uses (6 residences) located to the south and southwest of the project site along Langner Avenue (Site LT-2). Two long-term noise measurements were taken between October 10, 2016 and October 13, 2016. Figure 12 shows the location of the noise measurements and nearby residences. Ambient noise included normal project site operations (i.e., intermittent noise from activities associated with equipment storage, although no activities occurred near the stockpile location on the southern half of the property during the measurement period), traffic along Todd Road, and other industrial uses in the area. The noise environment along Langner Avenue primarily included distant traffic and industrial operations. These noise measurements were used to establish existing daytime and nighttime noise levels at the project site (for noise and land use compatibility purposes) and at nearby residential uses. The noise monitoring indicates an existing ambient day-night average noise level (L_{dn}) of 60 dBA L_{dn} at Site LT-1, and an existing ambient day-night average noise level (L_{dn}) ranging from 52 to 54 dBA L_{dn} at Site LT-2.

Project Noise Generation

Project operations would generate noise from the following sources: (1) the equipment storage site; (2) crushing operations; and (3) temporary stockpile operations. The potential impacts from these new noise sources are summarized below.



Figure 12. Noise Monitoring Locations and Nearby Residences
(Source: Illingworth & Rodkin)

(1) *Equipment Storage Site.* Noise from the contractor's equipment storage site would be from vehicles (autos, trucks) and construction equipment, and would be intermittent throughout the day. The noise assessment (p. 9) determined that the typical worst-case noise level was 69 dBA. The project proposes a 14-foot tall masonry block noise barrier, approximately 1,300 feet in length (see Figures 1 and 4 of this Initial Study), along the western boundary of the equipment storage site. According to the noise assessment (p. 10), *"the proposed 14-foot masonry block noise barrier would provide at least 12 dBA of noise reduction as measured at the nearest residential property line to the west,"* which would reduce day and night noise levels to a less than significant level.

(2) *Crushing Operations.* Noise from the concrete and asphalt recycling crushing plant would be the main noise source of the crushing operations. Proposed hours of operation are from 7 a.m. to 6 p.m. Other noise sources would be from related equipment use, such as front loaders or excavators that feed materials into the plant, and trucks on-site loading or unloading materials. The noise assessment (p. 12) determined that noise from crushing operations would be continuous (at least 30 minutes in any given hour), with a noise level of 85 dBA measured on the front side of the crushing plant, where the radiator is located;

on the opposite side, away from the radiator, the noise level was measured at 75 dBA. The project proposes a 25-foot earth berm, approximately 1,310 feet in total length (see Figures 1 and 4 of this Initial Study), which according to the noise assessment (p. 13) *“would provide approximately 18 dBA of noise reduction.”* In addition, the applicant has stated that the front (or “open”) side of the crushing plant would be oriented to the east, away from nearby receptors. The crusher would also be located at least 140 feet from the nearest residential property line, which according to the noise assessment (p. 13) would result *“in an additional 9 dBA of attenuation due to increased distance from the noise source.”* These project features combined would reduce crushing operations noise to a less than significant level with proposed day time operations.

(3) Temporary Stockpile Operations. Noise from the temporary stockpile would be from heavy-duty trucks used to transport materials to and from the site (the southern half of the property). These activities are proposed to occasionally occur at night. The noise assessment (p. 14) determined that noise from temporary stockpile operations (which assumes truck traffic of up to 15 trucks per hour) would produce noise levels up to 77 dBA measured at a distance of 125 feet. As noted in the noise assessment (p. 16), although the proposed earth berm along the western and southern boundaries of the temporary stockpile would reduce daytime noise levels at the property lines to levels below County thresholds, nighttime noise levels would exceed the General Plan Table NE-2 noise level thresholds at the nearest residential property lines by up to 5 dBA. Restricting nighttime truck activity associated with the stockpile operations, in conjunction with the proposed noise barrier, would reduce noise levels to acceptable levels at the nearest residential property line. Therefore, the actions in Mitigation Measure NOISE-1 shall be incorporated into the project to reduce nighttime project noise to a less than significant level.

Temporary Construction Noise

Construction noise would be considered temporary and short term because the impact would cease when construction of the noise barrier and earth berm are completed. Nearby residents could experience temporary noise from construction equipment and the delivery of construction materials. Noise impacts from construction depend on the type of construction equipment, timing and duration of noise-generating activities, and distance between construction noise sources and noise sensitive receptors. Typical equipment would include backhoes, excavators, and other mechanized equipment (trucks). Construction is expected to last less than a year. Based on the noise assessment, construction noise levels at the closest residences to the north (approximately 100 feet from work areas) would range from 69 to 79 dBA L_{eq} under worst case conditions (i.e., when equipment is operating 100 feet from the residence), while construction noise levels at the closest residence to the south (approximately 280 feet from work areas) would range from 60 to 70 dBA L_{eq} under worst case conditions. These values are generally within the 62 to 73 dBA L_{dn} ambient noise levels recorded at the project site and would not represent a substantial increase above existing ambient noise levels. To reduce project construction

noise, best management practices (BMPs) shall be incorporated into the project as Mitigation Measure NOISE-2, which would reduce project construction noise levels to a less than significant level.

Significance Level: Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measure NOISE-1 (Operational-related): The applicant shall restrict on-site truck and heavy equipment activity associated with stockpiling operations to the hours of 7:00 AM to 9:00 PM.

Mitigation Measure NOISE-2 (Construction-related): The proposed project shall incorporate the following construction noise control best management practices into project construction activities:

- A detailed construction plan shall be submitted to Permit Sonoma, for review and approval, that identifies the schedule for major noise-generating construction activities and lists the construction noise reduction measures identified in the project noise assessment. The schedule shall be distributed to adjacent noise-sensitive receptors prior to commencement of construction.
- Limit construction to between the hours of 8:00 AM and 6:00 PM, Monday through Friday. No construction activities shall occur on weekends or holidays.
- Locate construction staging areas as far as possible from nearby sensitive receptors.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from nearby sensitive receptors.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines shall be strictly prohibited.
- Utilize "quiet" air compressors and other "quiet" equipment where such technology exists.

Mitigation Monitoring:

Mitigation Monitoring NOISE-1 and NOISE-2 (Operational-related): PRMD staff shall ensure that operational hours are adhered to and that all specifications of Mitigation Measures NOISE-1 & -2 are listed on all necessary site alteration, grading, building or improvement plans, prior to issuance of grading or building permits. Any noise complaints will be investigated by County staff.

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

Comment:

Project construction activities would not be likely to generate excessive groundborne vibration and noise because impact or vibratory pile driving would not be needed.

Groundborne vibration likely to result from project construction would be from use of high-power vibratory tools and rolling stock equipment (i.e., tracked vehicles, compactors). In addition, vibration levels would vary, depending on soil conditions, construction methods, and the specific equipment. According to the project noise assessment (p. 18), *“At 80 feet, vibration levels produced by heavy construction equipment operating near the site’s westernmost property line could reach 0.058 in/sec PPV. Worst-case vibration levels resulting from the construction and operation of the project would be well below the 0.3 in/sec PPV used to assess the potential for cosmetic damage to structures (e.g., minor cracking to plastered walls or ceilings in older residential dwellings).”*

Significance Level: Less than Significant Impact

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

Comment:

The project site is not within the Airport Referral Area as designated by the Sonoma County Comprehensive Airport Land Use Plan. The Charles M. Schulz Sonoma County Airport is located approximately 9.0 miles north-northwest of the project site. In addition, there are no known private airstrips in the vicinity of the project site.

Significance Level: No Impact

14. POPULATION AND HOUSING:

Would the project:

- a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Comment:

The project does not propose construction or demolition of housing, and the onsite construction yard is currently operating. Some short-term jobs attributable to project construction would be created, although it is expected that most of the construction workers would already live in the region. The project would not result in substantial unplanned population growth.

Significance Level: Less than Significant Impact

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

Comment:

There are no dwellings or housing onsite. The project would not displace people, and no replacement housing would be necessary.

Significance Level: No Impact

15. PUBLIC SERVICES:

Would the project:

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

i. Fire protection?

Comment:

The proposed project is a construction equipment/materials storage and crushing operations yard. The project is located within the Sonoma County Fire District. The district operates eight fire stations.⁴⁸ The fire station closest to the project site is County Station 4 (Rincon Valley Station 4), located approximately 1,000 feet to the northeast of the project site. The project is within an existing service area and would not trigger the need to build a new fire station or expand an existing one.

The Sonoma County Code requires that all new development meet Fire Safety Standards (Chapter 13). Compliance with these standards typically includes providing for sprinklers in buildings, alarm systems, extinguishers, vegetation management, hazardous materials management, and management of flammable or combustible liquids and gases. As a standard condition of approval, compliance with these County Code standards, as applicable (e.g., the project does not propose any buildings), would ensure that impacts would be less than significant. Also see Section 9, Hazards and Hazardous Materials, of this Initial Study.

Significance Level: Less than Significant Impact

⁴⁸ Sonoma County Fire District. "Our District," accessed May 18, 2020. <https://www.sonomacountyfd.org/our-partnership>

ii. Police?

Comment:

As discussed in 15.a.i, the project is a construction equipment/materials storage and crushing operations yard. The project is served by the Sonoma County Sheriff Department and is in Sonoma County Sheriff's Office Zone 5.⁴⁹ Any minimal increase in police services resulting from the project would not require new or altered facilities because the project does not propose any change in the site's current use.

Significance Level: Less than Significant Impact

iii. Schools, parks, or other public facilities?

Comment:

The project is in the Bellevue Union School District (elementary) and Santa Rosa City Schools (Santa Rosa Elementary School District and Santa Rosa High School District). The project does not propose residential uses and would not have a substantial impact on school enrollment because site operations would continue with existing employees. No new or expanded schools would be foreseeable as a result of the project.

Significance Level: Less than Significant Impact

iv. Parks?

Comment:

The project is located in unincorporated Sonoma County. Park services are provided by Sonoma County Regional Parks. The project site is approximately 2,850 feet southwest of Andy's Unity Park, which is managed by the Regional Parks agency. The project site is located approximately 2,750 west of Hunter Creek Trail, which is also managed by the Regional Parks agency. The trail is 1.5 miles long, with the western terminus of the trail located east of the project site. Any increase in demand for recreation facilities would be minimal because project employees already live in the region and would be expected to use those recreational facilities closer to where they live. Any increased use of parkland resources would be intermittent and would not be expected to result in the need to build new park facilities due to increased demand.

Significance Level: Less than Significant Impact

⁴⁹ Sonoma County Sheriff's Office. "Sonoma County Sheriff's Office Zone Map," November 1, 2013, accessed May 18, 2020. <https://www.sonomasheriff.org/zone-map>

v. Other public facilities?

Comment:

The project is in the Sonoma County Library service area and is approximately 2.4 miles from the Rohnert Park-Cotati Regional Library. Increases in County library service demand resulting from the project would be minimal because the project does not propose residential uses.

The project would not be served by public water facilities. The project uses water to control on-site dust emissions and would use water trucks for these activities. The project would be required to provide a bathroom(s) for on-site employees, but would not be served by public wastewater facilities. See Section 19, Utilities and Service Systems, for more information on project water demand and wastewater treatment.

The need for expanded public facilities to serve the project is not reasonably foreseeable.

Significance Level: Less than Significant Impact

16. RECREATION:

Would the project:

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

Comment:

The project is located in unincorporated Sonoma County. Park services are provided by Sonoma County Regional Parks. The project is approximately 2,850 feet southwest of Andy's Unity Park, which is managed by the Regional Parks agency. The project is located approximately 2,750 west of Hunter Creek Trail, which is also managed by the Regional Parks agency. The trail is 1.5 miles long, with the western terminus east of the project site. The proposed project would not involve activities that would cause or accelerate physical deterioration or parks or recreational facilities. The proposed project does not include residential use. Any increase in demand for recreation facilities would be minimal because project employees already live in the region and would be expected to use those recreational facilities closer to where they live. Therefore, the increase in use of existing neighborhood and regional parks would be minimal and would not lead to physical deterioration of the facilities.

Significance Level: Less than Significant Impact

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

Comment:

The project does not include recreational facilities. As discussed in Section 16.a, the project would not require new or expanded recreational facilities.

Significance Level: No Impact

17. TRANSPORTATION:

Would the project:

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

Comment:

The Sonoma County General Plan Circulation and Transit Element includes adopted objectives for roadway system operations. A Traffic Study was prepared for the project by W-Trans to address potential changes in traffic resulting from the project and evaluate the proposed project's traffic with those adopted objectives.⁵⁰ The traffic evaluation also helps the County determine the project's Traffic Mitigation Fee, per Chapter 26, Article 98 of the County Code.

The following analysis summarizes the key results, findings, and recommendations of the Traffic Study relevant to CEQA requirements (refer to Appendix C for the full Traffic Study). The results of the Traffic Study indicated that the project could be expected to generate between zero and 50 daily truck trips (with a maximum of 30 trips during either the AM or PM peak hours). Based on Highway Capacity Manual standard passenger vehicle ("car") conversion rates to help evaluate local traffic conditions, the 50 truck trip maximum would be equivalent to 150 cars. Because no increases to current traffic-generating activities are proposed, and the project would be reducing its operating hours, these project trip generation numbers are also assumed to represent conservative existing (current) conditions for purposes of CEQA.

The Traffic Study collected data to determine the existing traffic conditions for the project site and its vicinity at five intersections.⁵¹ According to the County, Todd Road is a Major

⁵⁰ W-Trans, "Final Traffic Impact Study for the Ghilotti Construction Yard," prepared for the County of Sonoma, March 7, 2018.

⁵¹ Intersections are Todd Road/Standish Avenue-Ghilotti Avenue, Todd Road/Moorland Avenue, Todd Road/US 101 south ramps, Todd Road/US 101 north ramps, and Todd Road/Santa Rosa Avenue.

Collector until it reaches the railroad tracks east of Ghilotti Avenue; from there, until it reaches the US 101 south ramp, Todd Road is a Minor Arterial.⁵²

Queuing Analysis. The Traffic Study (pp. 26-28) analyzed turning movement queues at the five study intersections. As directed by the County, the 95th percentile queue is the length of the queue in left-turn pockets at intersections that would be equal to or less than 95 percent of the time (and conversely, only five percent of the time would a longer queue be expected).

The Traffic Study determined that no left-turn queues at the Todd Road/Standish Avenue-Ghilotti Avenue intersection would exceed available storage except for the PM peak hour under future (cumulative) conditions. Southbound left-turn queues at Todd Road/Moorland Avenue would exceed available storage during both AM and PM peak hours during all conditions. Northbound left-turn queues at both the Todd Road/US 101 southbound and the Todd Road/US 101 Northbound ramps would exceed available storage during both AM and PM peak hours under all conditions. Although there is no additional storage available for the Todd Road/US 101 Southbound ramp (because the South Moorland Avenue/Overcrossing intersection is nearby), the tee intersection configuration of the Todd Road/US 101 Northbound ramp would accommodate some excess queuing. For this intersection, the Traffic Study (pp. 27-28) notes *“some modification to the signal timing could achieve relief and allow right-turning traffic to pass by the queue of left-turning vehicles.”*

Northbound left-turn queues at Todd Road/Santa Rosa Avenue would exceed available storage during both AM and PM peak hours under all conditions, and westbound Todd Road/Santa Rosa Avenue left-turn queues would exceed available storage during the PM peak hour under all conditions. However, the Traffic Study determined (p. 28) that for northbound queues, *“because the left-turn lane connects to a two-way left-turn lane that extends approximately 2,500 feet to Mountain View Avenue there is no safety concern associated with the queuing.”* For the westbound left-turn queues, the Traffic Study determined *“the project would not add any trips to this movement.”* The Traffic Study determined (p. 28) that *“The project would not cause any queues to exceed available storage that would not be expected to exceed available storage without the project.”*

Because the project is not proposing increases in traffic-generating operations, and is reducing its operating hours, over current conditions, project traffic would not impact traffic queues over current conditions.

⁵² Sonoma County Department of Transportation & Public Works, Functional Classification, <http://sonomacounty.ca.gov/TPW/Roads/Services/Data-and-Resources/Functional-Classification/>, accessed 1/10/20.

Collision History and Analysis. The Traffic Study (p. 5) reviewed collision data from the California Highway Patrol for the most current five-year period (January 1, 2012 through December 31, 2016), during which time collisions at the five study intersections were reported:

<u>Intersection</u>	<u>Collisions</u>
1. Todd Road/Standish Avenue-Ghilotti Avenue	10
2. Todd Road/Moorland Avenue	17
3. Todd Road/US 101 South Ramps	12
4. Todd Road/US 101 North Ramps	8
5. Todd Road/Santa Rosa Avenue	27

Collision rates for the intersections were calculated based on collisions per million vehicles entering (c/mve) the intersection and compared with statewide data (averages) for similar intersections. Collision rates for Todd Road/Standish Avenue-Ghilotti Avenue, Todd Road/Moorland Avenue, and Todd Road/Santa Rosa Avenue (0.46, 0.64, and 0.49) exceeded the statewide average rates (0.26, 0.14, and 0.43, respectively), while collision rates for Todd Road/US 101 South Ramps and Todd Road/US 101 North Ramps (0.37 and 0.25) were less than the statewide average (0.43 and 0.27, respectively). The Traffic Study noted that of the three intersections with collision rates higher than the statewide average, one was a signalized intersection (Todd Road/Santa Rosa Avenue), and this intersection likely experienced more collisions because of the two gas stations on the intersection corners and the proximity of their driveways. The Traffic Study provided the following recommendation: *“Consolidation of the driveways or restricting access to right-in right-out movements only could help to reduce the incidence of collisions.”* For the other two intersections exceeding statewide collision rates (Todd Road/Standish Avenue-Ghilotti Avenue and Todd Road/Moorland Avenue), neither intersection is signalized, and over half of the collisions at each were broadside or sideswipe collisions. Because the project is not proposing increases in traffic-generating operations, and is reducing its operating hours, over current conditions, the project is not expected to increase the risk of traffic collisions.

Bicycle Facilities. As explained in the Traffic Study (p. 29), Sonoma County has a Class II bike lane planned for Todd Road in the project vicinity. According to the Traffic Study, *“Bicycle facilities serving the project site are expected to be adequate upon completion of the planned improvements.”* The project does not propose activities that would conflict with planned bike lanes along Todd Road.

Pedestrian Facilities. The project’s rural location lacks pedestrian facilities; however, the Traffic Study (p. 29) determined that *“The proposed use of the site as a construction yard would not be expected to generate any pedestrian traffic so the existing lack of pedestrian facilities would have no impact.”*

Transit Stops. The project site is served by Sonoma County Transit (SCT), with bus stops on Todd Avenue near Standish Avenue. The Traffic Study (p. 29) determined that public transit facilities serving the site are adequate.

Traffic Conclusions.

The project is not proposing an increase in traffic-generating operations, and is reducing its operating hours, over current conditions. Traffic generation resulting from the project would be expected to be substantially the same as the existing operations, and therefore would not be expected to conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. In addition, the County would require the project, as a condition of approval, to pay a development fee (Traffic Mitigation Fee) based on project Average Daily Traffic (ADT) and the commercial fee in effect at the time of permit issuance, per Chapter 26, Article 98 of the County Code.

Significance Level: Less than Significant Impact

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

Comment:

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

In order to assess the anticipated VMT for the proposed project, W-Trans prepared a summary analysis (May 19, 2020).⁵³

Sonoma County has not yet adopted a VMT standard, nor has the County adopted a policy or threshold of significance regarding VMT. Accordingly, as with other cities and counties throughout the state that similarly have not established VMT standards and thresholds, W-Trans used the “Technical Advisory on Evaluating Transportation Impacts in CEQA” (2018) developed by the Governor’s Office of Planning and Research (OPR) for estimating VMT impacts.

For CEQA VMT analysis purposes, “vehicle miles traveled” typically refers to the amount and distance of automobile travel attributable to a project. However, as noted by W-Trans, the Technical Advisory indicates “the term ‘automobile’ refers to on-road passenger vehicles, specifically cars and light duty trucks,” and therefore a VMT analysis is not relevant to a project where heavy trucking activity is the principal vehicular activity. Another source

⁵³ W-Trans, “Vehicle Miles Traveled Assessment for the Ghilotti Construction Yard Project,” prepared for Todd Road Partners, May 19, 2020.

of VMT is from employees, but the project does not propose to increase employment, so there would be no new employee VMT to consider. In addition, although CEQA does not require a quantitative VMT analysis for circulation purposes, truck VMT is still be considered for greenhouse gas (GHG) analysis purposes. (Section 8, Greenhouse Gas Emissions, uses VMT as one of the variables in its calculations for the project.)

As W-Trans noted, according to the Technical Advisory any project generating fewer than 110 daily trips “generally may be assumed to cause a less-than-significant impact.” Therefore, because the project would be expected to generate a maximum of 50 truck trips in any given day, even if heavy truck VMT were included, project VMT impacts would still be considered less than significant.

Significance Level: Less than Significant Impact

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

Comment:

The Traffic Study evaluated sightlines approaching the project driveway along Todd Road at Ghilotti Avenue, based on sight distance criteria in *A Policy on Geometric Design on Highways and Streets*, by the American Association of State Highway and Transportation Officials (AASHTO). With a design speed of 35 miles per hour (mph), the corner sight distance recommended for a left-turn is 390 feet, and for a right-turn is 335 feet. The Traffic Study (p. 30) stated that from field observations, “[the] sight distance extends 500 feet to both east and west which is enough to satisfy speeds greater than 35 mph.”

As a condition of approval, the Department of Transportation and Public Works (DTPW) would require that the applicant to maintain existing and proposed vegetation fronting the site and public right-of-way to meet minimum AASHTO sight distances.

In addition, because of the project’s rural setting and lack of pedestrian and bicycle facilities, hazards to pedestrians and bicyclists could occur during construction activities. These construction-related hazards could also occur to drivers. The following mitigation would reduce this impact to a less than significant level.

Significance Level: Less than Significant with Mitigation Incorporated

Mitigation:

Mitigation Measure TRANS-1 (Construction-related): The applicant/operator shall submit a *Construction Period Traffic Control Plan* to the County for review and approval. The plan shall include traffic safety guidelines compatible with section 12 of the Caltrans Standard Specifications (“Construction Area Traffic Control Devices”) to be followed during construction. The plan shall also specify provision of adequate signage and other

precautions for public safety to be provided during project construction. In particular, the plan shall include a discussion of bicycle and pedestrian safety needs due to project construction and, later, project operation. In addition, the plan shall address emergency vehicle access during construction and provide for passage of emergency vehicles through the project site at all times. The applicant/contractor shall notify local emergency services prior to construction to inform them that traffic delays may occur and also of the proposed construction schedule.

Mitigation Monitoring:

Mitigation Monitoring TRANS-1 (Construction-related): Prior to approval of a grading permit, the County shall review and approve the project *Construction Period Traffic Control Plan*, with revisions as necessary. During construction, the County shall periodically verify that traffic control plan provisions are being implemented.

d) Result in inadequate emergency access?

Comment:

The proposed project does not include any buildings or structures that would require compliance with the state Fire Code. The project provides access from two entrances, both along Ghilotti Avenue. One entrance is approximately 290 feet south of Todd Road, and the second entrance is approximately 895 feet south of Todd Road. After review of the initial project submittal materials, there were no Fire Department comments.

Significance Level: No Impact

e) Result in inadequate parking capacity?

Comment:

Sonoma County Code Section 26-86 does not establish parking requirements for the type of industrial uses currently proposed (contractor's equipment storage, crushing operations, materials stockpiling, etc.). Parking for employee vehicles would be located in the northeastern part of the project site, where equipment storage and equipment parking is proposed.

Significance Level: No Impact

18. TRIBAL CULTURAL RESOURCES:

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

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

ii) A resource determined by the lead agency. In its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Comment:

Based on a records search from the Northwest Information Center (CHRIS-NWIC), no known Tribal Cultural Resources (TCRs) or unique archaeological resources associated with TCRs have been indicated within the project boundaries.⁵⁴ In addition, there have been no responses to requests for information from local tribes.

The proposed project would not result in a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5. As discussed in Section 5, Cultural Resources, the project would be required to comply with the County grading ordinance (County Code Section 11-14-050), which includes provisions for the protection of human remains and archaeological resources during grading activities. Implementation of the County grading ordinance would reduce potential project impacts on previously undiscovered TCRs or unique archaeological resources accidentally encountered during project implementation to a less than significant level.

Significance Level: Less than Significant Impact

19. UTILITIES AND SERVICE SYSTEMS:

Would the project:

⁵⁴ Tom Origer & Associates. February 15, 2019. Cultural Resources Study of the Property at 792 Todd Road, Santa Rosa, Sonoma County, California.

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

Comment:

The project site is not served by a public water provider, and it is not served by a private well. The existing operation uses water from its adjoining construction yard to control dust emissions on-site. Water trucks apply water for dust control during crushing and materials stockpile management operations. Water would also be sprayed on exposed surfaces during construction of the proposed earthen berm and sound wall (see Section 3, Air Quality), and for landscape irrigation. Project water use for dust control and landscape irrigation is not anticipated to require the relocation or construction of new or expanded water facilities other than potentially connecting the proposed irrigation system to an existing water system on Ghilotti's adjoining construction yard.

The project site is not served by a wastewater treatment facility, and it does not contain a private septic system. Permit Sonoma requires the project applicant to provide a bathroom(s) for the on-site employees. The project applicant submitted a septic feasibility evaluation.⁵⁵ The evaluation assessed the potential to install a septic system on the project parcel or on either of two adjacent parcels (APN 134-171-049 and APN 134-171-051) based on a Pre-Percolation Site Evaluation (WSR19-0329), which included a soils investigation and analysis of the drainage conditions and topography of the three parcels. Based on the pre-percolation evaluation, BC Engineering Group determined that it is extremely unlikely that any of the three parcels would reveal suitable soil conditions for a County Code-compliant septic system installation. Therefore, none of the three assessed parcels, including the project parcel, is suitable for a septic system. In addition, the South Park County Sanitation District, which serves portions of unincorporated Sonoma County, will not allow the project to connect to the district's sanitary sewer main under Todd Road. Permit Sonoma Well and Septic has indicated that there are alternative wastewater disposal systems that can be considered to handle the limited septic demand created by the project. The project conditions require the applicant to obtain approval of an alternative waste disposal system prior to issuance of grading permits.

The project would convey 100 percent of storm water runoff generated on-site to existing vegetated swales surrounding the project site for treatment. The project would not require new or expanded storm water drainage facilities.

The project would not require new, expanded, or relocated electrical, natural gas, or telecommunications facilities because it is in an area where this infrastructure is already

⁵⁵ BC Engineering Group. "Septic Feasibility Evaluation on APN 134-171-051 for Septic Easement Potential to Serve APN 134-171-050," November 11, 2019.

available.

Significance Level: Less than Significant Impact

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

Comment:

The project site is not served by a public water provider, and it is not served by a private well. The project would use water from its adjoining construction yard for the two employees operating the concrete recycling operation. This same well source would be used to minimize dust emissions from on-site activities and for landscape irrigation. Water trucks would apply water for dust control during crushing and materials stockpile management operations. Construction of the proposed earthen berm and sound wall would include water use to control dust emissions from exposed surfaces. Construction activities would be temporary and would extend over a period of approximately two months. No other water uses are proposed. The project would have sufficient water supplies available for dust control activities and landscape irrigation into the future. See Section 10, Hydrology and Water Quality, for more details on project water use for landscape irrigation.

Significance Level: Less than Significant Impact

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

Comment:

The project site is not served by a wastewater treatment provider. Permit Sonoma requires the project applicant to provide a bathroom(s) for the on-site employees. The project is anticipated to generate wastewater from a maximum of two on-site employees. The BC Engineering Group septic feasibility evaluation assessed the potential to install a septic system on the project parcel or either of two adjacent parcels (APN 134-171-049 and APN 134-171-051) based on a Pre-perc Site Evaluation (WSR19-0329). BC Engineering Group determined that none of the three evaluated parcels, including the project parcel, is suitable for septic system installation. In addition, the South Park County Sanitation District, which serves portions of unincorporated Sonoma County, will not allow the project to connect to the district's sanitary sewer main under Todd Road. However, Permit Sonoma Well and Septic has indicated that there are alternative wastewater disposal systems that can be considered to handle the limited septic demand created by the project. The project conditions require the applicant to obtain approval of an alternative waste disposal system prior to issuance of grading permits.

Significance Level: Less than Significant Impact

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

Comment:

Construction of the proposed earthen berm and sound wall would generate construction waste. The applicant would recycle construction waste, as determined feasible by Permit Sonoma, as a project condition of approval.

Based on CalRecycle rates for industrial facilities use,⁵⁶ the project is anticipated to generate approximately 8.93 pounds (lbs.) of solid waste per on-site employee per day. With a maximum of two on-site employees, the project would have a daily solid waste generation rate of approximately 18 lbs. Annually, this would result in a generation of approximately 6,570 lbs. of solid waste (or 3.3 tons). The project would also produce solid waste from equipment packaging and replacement of old equipment parts. Replaced equipment parts would be recycled or disposed of according to all applicable federal, state, and local solid waste disposal laws. In addition, the project would process and recycle asphalt grindings, rock, and broken concrete obtained from construction sites for reuse in construction projects throughout the County.

Sonoma County has a solid waste management program in place that provides solid waste collection and disposal services for the entire County. The program can accommodate the permitted collection and disposal of the waste that would result from the proposed project. Sonoma County has access to adequate permitted landfill capacity to serve the proposed project.

Significance Level: Less than Significant Impact

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

Comment:

The project would comply with all federal, state, and local management and reduction statutes and regulations related to solid waste. See item (d) above.

Significance Level: No Impact

20. WILDFIRE:

⁵⁶ CalRecycle. "Estimated Solid Waste Generation Rates," accessed May 18, 2020.
<https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>

If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**
- 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 of 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?**

Comment:

The project site is located southwest of the intersection of Ghilotti Avenue and Todd Road in Santa Rosa, Sonoma County. The project parcel and surrounding area is in a Local Responsibility Area (LRA) and is not Classified as a Fire Hazard Severity Zone. There would be no impacts with regard to criteria a) through d) because the area is not located in a State Responsibility Area or on lands classified as High or Very High Fire Severity Zones. See Section 9, Hazards and Hazardous Materials, for a discussion of wildfire risk and the project's compliance with the Sonoma County Fire Safety Standards (Sonoma Code Chapter 13) and related state codes.

Significance Level: No Impact

21. MANDATORY FINDINGS OF SIGNIFICANCE

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

Comment:

Potential impacts on nesting birds, and on California tiger salamander (CTS) during construction of the roadway realignment (a project condition of approval), are addressed in

section 4 (Biological Resources). Implementation of the required mitigation measures (Mitigation Measures BIO-1 and BIO-2) would reduce these potential impacts to less than significant levels. Impacts on cultural resources ("California history or prehistory") are addressed in section 5 (Cultural Resources) and would be less than significant, with no mitigation measures required.

Significance Level: Less than Significant with Mitigation Incorporated

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

Comment:

No project impacts have been identified in this Initial Study that are individually limited but cumulatively considerable. The project would contribute potentially significant impacts related to air quality, biological resources, noise, and transportation, as described in the Initial Study, but mitigation measures would reduce project impacts to less than significant levels. Therefore, the project's contribution to off-site cumulative impacts would be less than considerable.

Significance Level: Less than Significant with Mitigation Incorporated

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

Comment:

Proposed project construction and operation have the potential to cause substantial adverse effects ("potentially significant impacts") on human beings, both directly and indirectly. However, all potentially significant impacts on human beings (i.e., those related to air quality, noise, and transportation) were analyzed, and would be less than significant with implementation of the mitigation measures included in the Initial Study and incorporated into the project.

Significance Level: Less than Significant with Mitigation Incorporated

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