

# **Cloverdale Unified School District South Fields Public Draft Initial Study**

*Prepared for:*

## **Cloverdale Unified School District**

97 School Street

Cloverdale, California 95425

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# Acronyms and Abbreviations

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Acronym/Abbreviation	Definition
AC	Asphalt concrete
ACOE	U.S. Army Corps of Engineers
APE	Area of Potential Effect
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CO <sub>2</sub> E	Carbon dioxide equivalent
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CUSD	Cloverdale Unified School District
dB	Decibel
dBA	A-weighted decibel
EO	Executive Order
GHG	Greenhouse gas
GWP	Global warming potential
IS	Initial Study
L <sub>dn</sub>	Day/night average noise level
LED	Light emitting diode
MBTA	Migratory Bird Treaty Act
MLD	Most likely descendent
MND	Mitigated Negative Declaration
MMRP	Mitigation Monitoring and Reporting Program
MT	Metric tons
MT/yr	Metric tons per year
NAHC	Native American Heritage Commission
NO <sub>x</sub>	Nitrogen Oxides
NSCAPCD	Northern Sonoma County Air Pollution Control District
NWIC	Northwestern Information Center
PM <sub>2.5</sub>	Fine particulate matter
PM <sub>10</sub>	Coarse particulate matter
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board
SAA	Streambed Alteration Agreement
SWPPP	Stormwater Pollution Prevention Plan
USFWS	U.S. Fish and Wildlife Service
VMT	Vehicle miles traveled

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# 1 Introduction

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## 1.1 Project Overview

The proposed Cloverdale Unified School District (CUSD) South Fields Project (proposed project) would construct athletic fields on a portion of a vacant property at the south end of the City of Cloverdale. The project is proposed by the Cloverdale Unified School District (District) to develop a sports field complex that would support existing District athletic programs and allow community use outside of school hours. The sports fields would include a baseball field and softball field, each of which would also incorporate a soccer field. The project would also construct a parking lot, restroom, and concession stand to support use of the fields, and establish a dog park in the northwestern portion of the site. No lighting or amplified sound system is proposed.

The project would develop approximately 9 acres of the 31-acre property. Throughout this Initial Study, land within the boundaries of the District-owned parcel are referred as the project property, while the boundaries of the proposed construction activities are referred to as the project site. The District is conducting feasibility and planning studies for other potential uses in the remainder of the property but has not identified funding or timing for future development or committed to any specific uses.

Access to the athletic fields would be provided from the existing unpaved public roadway along the southern boundary of the District property, which is signed as Kelly Road. This road connects with Dutcher Creek Road (which becomes South Cloverdale Boulevard north of the site) on the east and provides access to rural residential and agricultural properties to the west. It is expected that this road would be widened and paved as part of a separate proposed project on the adjacent property to the south. Water and sewer lines would be extended to the proposed restrooms from Dutcher Creek Road/South Cloverdale Boulevard.

Refer to Section 3, Initial Study Checklist, for a more detailed project description including figures.

## 1.2 California Environmental Quality Act Compliance

The proposed Cloverdale Unified School District South Fields is proposed by the Cloverdale Unified School District (CUSD). Because creation of the South Fields project would require discretionary action by the District Board of Trustees, the project is subject to the California Environmental Quality Act (CEQA). CUSD is the Lead Agency under CEQA in accordance with Section 15051 of the CEQA Guidelines.

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

## 1.3 Project Planning Setting

The project property is currently located within Sonoma County. It is also within the southernmost portion of the City of Cloverdale's Sphere of Influence and Urban Growth Boundary. The Sonoma County General Plan land use designation for the site is Rural Residential. The City of Cloverdale General Plan designations for the site are Low Density Residential and Conservation in the western portion of the site and General Industry in the eastern portion of the site. The Sonoma County zoning designations for the site includes Agricultural and Residential (AR-B8) along with the Scenic Resources Combining District/Valley Oak Habitat Combining District (SR-VOH) on the western portion of the site; Rural Residential (RR-B8, RRD-B6-40) on the eastern portion of the site; and Limited Urban Industrial (M1-B8) for the flagpole portion of the lot that extends to Dutcher Creek Road. Because the property is outside of the City limits, there are no City of Cloverdale zoning designations for the site.

The properties north, west, and south of the project property support rural residential and agricultural land uses. In August 2020, the City of Cloverdale approved development of a residential project, Baumgardner Ranch, on the property immediately north of the CUSD South Fields site. Baumgardner Ranch is planned to construct a total of 304 housing units and related infrastructure on approximately 20 acres while preserving 8.5 acres of privately maintained open space in the western portion of the site. In approving the project, the Cloverdale City Council adopted a Condition of Approval requiring further negotiation regarding developing a 1.3-acre park within the project, which would require omitting 8 dwelling units from the development. The Baumgardner Ranch project would also widen and pave the existing unpaved private road (signed as Kelly Road) located between the Baumgardner Ranch property and the CUSD South Fields site and construct a southerly extension of South Foothills Boulevard. Both of these roads would be public City of Cloverdale facilities.

Additionally, in 2019, the City of Cloverdale approved development of the Sonoma County Vintner's Co-op, a wine warehouse facility, on the property east of the northern portion of the CUSD South Fields site. This project is currently under construction. Other properties along Dutcher Creek Road/South Cloverdale Boulevard near the project property support industrial and heavy commercial uses, including a gas station immediately north of the Sonoma County Vintner's Co-op site.

## 1.4 Public Review Process

The IS/MND is subject to a 30-day public review period. The public is encouraged to provide written comments during the 30-day review, and/or attend the Cloverdale Unified School District Board of Directors hearing at which the project and the IS and proposed MND will be considered for approval. In accordance with Section 15074 of the CEQA Guidelines, the District's Board of Directors must consider the IS/MND along with any comments received during the public review process, prior to approving the project. Comments may be submitted to the District at [macclainb@cUSD.org](mailto:macclainb@cUSD.org) or by U.S. mail at:

*ATTN: Betha MacClain, Superintendent  
Cloverdale Unified School District  
97 School St  
Cloverdale, CA 95425*

This IS/MND has been made available for download or viewing at CUSD's website (<https://cloverdale-ca.schoolloop.com/>),. In accordance with Section 15072 of the CEQA Guidelines, notice of the document's

availability and intent to adopt an MND has been published in the Cloverdale Reveille newspaper, filed at Sonoma County Clerk's office, and provided via email to local agencies. The document has also been provided for review to State agencies via the California State Clearinghouse.

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## 2 Summary of Findings

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### 2.1 Environmental Factors Potentially Affected

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

### 2.2 Environmental Determination

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

**Table 2-1**  
**Mitigation Measures**

Measure Number	Measure Text
BIO-1	<p><b>Nesting Bird Survey and Avoidance.</b> A qualified biologist shall conduct a survey for nesting birds approximately two days prior to vegetation removal or ground-disturbing activities during the nesting season (March through August). The survey shall cover the limits of construction and suitable nesting habitat within 500 feet for raptors and 100 feet for other nesting birds, as feasible.</p> <p>If any active nests are observed during surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest. The buffer distance will typically range from 50 to 300 feet and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.</p>
BIO-2	<p><b>Fencing and Best Management Practices.</b> Prior to the initiation of ground disturbance activities, the limits of disturbance shall be fenced and sediment and erosion control measures shall be utilized, which could include, but not be limited to: biodegradable straw wattles free of weed seeds, silt fencing, or biodegradable erosion control mats/blankets. Fencing for the dog park shall be placed a minimum of 25 feet from the edge of the adjacent riparian woodland</p>

Measure Number	Measure Text
	vegetation. No construction, staging, or other ground disturbance activities shall be permitted beyond the fencing.
BIO-3	<p><b>Riparian Vegetation.</b> A Streambed Alteration Agreement (SAA), pursuant to Section 1602 of the California Fish and Game Code, shall be procured from the California Department of Fish and Wildlife (CDFW) prior to any disturbances to riparian vegetation associated with the intermittent drainages onsite. As part of the SAA, compensatory mitigation a no less than a 1:1 ratio may be required to offset the loss of riparian habitat. If so, a mitigation plan shall be drafted by a qualified biologist to address implementation and monitoring requirements under the SAA to ensure that the project would result in no net loss of habitat functions and values. The plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, performance criteria, monitoring methods, and actions to be taken in the event that the mitigation is not successful. The plan shall be approved by the District and CDFW and any required compensatory mitigation shall take place either onsite or at an appropriate off-site location as approved by the CDFW and the District at a ratio directed by the SAA.</p>
BIO-4	<p><b>Vegetation Restoration.</b> The District shall be responsible for developing and implementing a restoration plan for temporarily impacted areas of natural vegetation. The plan shall, at a minimum, include an implementation schedule, planting/seeding plan, invasive species eradication methods, interim and final success criteria/performance standards, estimated costs, and identification of responsible entities. Areas to be restored shall be identified by a qualified biologist as being able to feasibly support the proposed native revegetation. Feasibility of native revegetation is primarily based on suitable soils, slopes, and aspect, as well as the presence of similar vegetation adjacent to the proposed mitigation areas. Further, the restoration areas shall be preserved in perpetuity. If a substantially similar plan is required under permits issued by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board, development and implementation of that plan would meet the requirements of this measure.</p> <p>In addition, the District shall be responsible for planting oak trees within the project property to replace the habitat values of the oak tree that is not within a riparian vegetation community and would be removed from the project site. This oak tree has a trunk diameter of 60 inches. The District shall plant one 15-gallon oak tree and one DeePot 40 oak tree OR 1-gallon oak tree for every 5 inches of trunk diameter. In total, the District shall plant 15 15-gallon oak trees and 15 DeePot 40 and/or 1-gallon oak trees.</p>
BIO-5	<p><b>Aquatic Resource Impact Permitting and Compensation.</b> The District shall obtain an individual or nationwide permit from the Army Corps of Engineers (ACOE) prior to commencement of grading within 75 feet of any wetlands or other waters of the U.S. in the project property. As part of the ACOE permit, compensatory mitigation may be required, at a ratio to be determined by the ACOE, to offset the loss of wetland/waters habitat. If so, and as part of the permit application process, a qualified biologist shall draft a mitigation and monitoring plan to address implementation and monitoring requirements under the permit to ensure that the project would result in no net loss of habitat functions and values. The plan shall</p>



Measure Number	Measure Text
	<p>contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, monitoring methods and performance criteria, extent of monitoring to be conducted, actions to be taken in the event that the mitigation is not successful, and reporting requirements. The plan shall be approved by ACOE and compensatory mitigation shall take place either on site or at an appropriate off-site location as approved by the ACOE.</p> <p>Concurrent with the ACOE permit, the District shall also obtain a Water Quality Certification from the RWQCB, subject to the same mitigation plan requirements stated above. Any work within the bed or bank of the intermittent drainages, or within the abutting riparian woodland, would require authorization from CDFW under a California Fish and Game Code Section 1600 Streambed Alteration Agreement, as required under MM BIO-2. Trimming or removal of riparian vegetation may also require compensatory mitigation, as directed by MM BIO-3 and BIO-4.</p>
CUL-1	<p><b>Unanticipated Cultural Resources.</b> In the event that unanticipated discoveries are encountered during project construction, all activity shall cease within 50 feet of the find until a qualified archaeologist In the event that unanticipated discoveries are encountered during project construction, all activity shall cease within 50 feet of the find until a qualified archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; PRC Section 21082) the archaeologist may record the find to appropriate standards (thereby addressing any data potential) and allow work to continue. If the archaeologist observes the discovery to be potentially significant under CEQA or Section 106 of the National Historic Preservation Act, additional efforts may be warranted as recommended by the qualified archaeologist. Examples of prehistoric resources may include: stone tools and manufacturing debris; milling equipment such as bedrock mortars, portable mortars, and pestles; darkened or stained soils (midden) that may contain dietary remains such as shell and bone; as well as human remains. Historic resources may include: burial plots; structural foundations; mining spoils piles and prospecting pits; cabin pads; and trash scatters consisting of cans with soldered seams or tops, bottles, cut (square) nails, and ceramics; paleontological resources.</p>
CUL-2	<p><b>Discovery of Human Remains.</b> In accordance with Section 7050.5 of the California Health and Safety Code, if potential human remains are found, all work within 100 feet shall be suspended and the county coroner shall be immediately notified of the discovery. The coroner shall provide a determination within 48 hours of notification. No further excavation or disturbance of the identified material, or any area reasonably suspected to overlie additional remains, shall occur until a determination has been made. If the county coroner determines that the remains are, or are believed to be, Native American, they shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendent (MLD) from the deceased Native American.</p>

Measure Number	Measure Text
	Within 48 hours of their notification, the MLD will recommend to the lead agency their preferred treatment of the remains and associated grave goods.
GEO-1	<b>Stormwater Pollution Prevention Plan.</b> In order to reduce runoff and erosion and minimize the potential of sedimentation as a result of the project, the District shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) for all construction activities.
GEO-2	<b>Paleontological Resources Awareness Training.</b> Prior to commencement of grading and construction permits, the District shall retain a professional Paleontologist to train the construction workers on how to determine the presence of fossils and the procedure to follow in the event paleontological resources are discovered.
HAZ 1	<p><b>Spill Prevention.</b> The following measures shall be implemented prior to and during construction and shall be incorporated into project plans and specifications.</p> <ul style="list-style-type: none"> <li>• All equipment shall be inspected by the contractor for leaks prior to the start of construction and regularly throughout project construction. Leaks from any equipment shall be contained and the leak remedied before the equipment is again used on the site.</li> <li>• Best management practices for spill prevention shall be incorporated into project plans and specifications and shall contain measures for secondary containment and safe handling procedures.</li> <li>• A spill kit shall be maintained on site throughout all construction activities and shall contain appropriate items to absorb, contain, neutralize, or remove hazardous materials stored or used in large quantities during construction.</li> <li>• Project plans and specifications shall identify construction staging areas and designated areas where equipment refueling, lubrication, and maintenance may occur. Areas designated for refueling, lubrication, and maintenance of equipment shall be approved by the City.</li> <li>• In the event of any spill or release of any chemical or wastewater during construction, the contractor shall immediately notify the City.</li> <li>• Hazardous substances shall be handled in accordance with Title 22 of the California Code of Regulations, which prescribes measures to appropriately manage hazardous substances, including requirements for storage, spill prevention and response and reporting procedures</li> </ul>
HAZ-2	<b>Cobalt Removal.</b> Prior to commencement of rough grading, the District's construction contractor shall complete targeted removal of soil at sample locations E2, E3, and E4 and confirmation soil sampling to confirm removal of the elevated cobalt (>46.9 mg/kg). If serpentine rock is discovered during targeted removal or further sampling and the elevated cobalt is determined to be due to the presence of serpentine rock, then alternative mitigation shall occur following rough grading if targeted removal is determined to not be practical. The alternative mitigation

Measure Number	Measure Text
	<p>would include the following remedies noted by DTSC for sites with naturally occurring asbestos (NOA) where removal is not practical.</p> <ul style="list-style-type: none"> <li>• Cover the site areas with elevated cobalt with imported clean fill materials or cover/cap specified areas with buildings, hardscape, sod, or landscaping sufficient to create a barrier and prevent future exposure pathways;</li> <li>• Develop an Operations and Maintenance Plan to ensure that the remedy remains protective in perpetuity; and</li> <li>• Record a land use covenant and/or school board resolution to restrict future activities that would create exposure to impacted soils.</li> </ul>
HAZ-3	<p><b>Arsenic Removal.</b> Prior to commencement of rough grading, the District's construction contractor shall complete targeted removal of soil at the sample location E1 and conduct additional soil sampling and analysis for arsenic concentrations. The soil samples shall be taken from the walls of the excavation area for the targeted removal to confirm that the arsenic concentrations of the remaining soil are at or below the typical background concentration of up to 12 mg/kg. If samples have concentrations above the background concentration, additional soil removal shall be completed and soil sampling conducted until all samples have a maximum arsenic concentration of 12 mg/kg.</p>
HAZ-4	<p><b>NOA Management.</b> The District shall ensure that construction contracts require that construction workers be trained to recognize potential NOA (e.g. serpentine rock) and that if grading activities uncover potential NOA, the grading and excavation work shall comply with State and local regulations for asbestos, including the California Air Resources Board Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations. This includes a requirement to notify the Northern Sonoma Air Pollution Control District within the next business day of the identification of NOA, serpentine, or ultramafic rock within the area to be graded and submittal and implementation of an asbestos dust mitigation plan within 14 days of the discovery of NOA, serpentine, or ultramafic rock. The mitigation plan shall include the following remedies where removal is not practical.</p> <ul style="list-style-type: none"> <li>• Cover the site areas with NOA with imported clean fill materials or cover/cap specified areas with buildings, hardscape, sod, or landscaping sufficient to create a barrier and prevent future exposure pathways;</li> <li>• Develop an Operations and Maintenance Plan to ensure that the remedy remains protective in perpetuity; and</li> <li>• Record a land use covenant and/or school board resolution to restrict future activities that would create exposure to impacted soils.</li> </ul>
HAZ-5	<p><b>Dust Suppression.</b> The District shall ensure that construction contracts require that soils within and adjacent to areas where grading, trenching, vegetation removal, and construction traffic will occur must be watered at least twice per day sufficient to minimize dust emissions, consistent with Northern Sonoma County Air Pollution Control District Rule 430.</p>

Measure Number	Measure Text
HAZ-6	<p><b>Wildfire Fuel Management.</b> The District shall implement the following vegetation management measures to minimize wildfire fuel within and adjacent to the project site:</p> <ul style="list-style-type: none"> <li>• Vegetation shall be removed and/or pruned within 15 feet of the perimeter of the dog park, except where the vegetation is within the riparian woodland associated with the drainage located south of the dog park.</li> <li>• Vegetation within 30 feet of each athletic field and the parking lot, concession stand, and restroom area shall be mowed at least monthly between November and April and at least twice per month between May and October except where the vegetation is within the riparian woodland associated with the adjacent drainages. As an alternative to mowing, goat grazing may be used to remove vegetation. In this case, fencing shall be placed 10 feet from the edge of riparian woodland vegetation to exclude goats from those areas.</li> </ul>
HYD-1	<p><b>Dog Park Waste Management</b> The District shall install signage, dog waste bag dispensers, and trash receptacles at the dog park. The signage shall notify all users of the dog park that they must pick up all dog waste and place it in the trash receptacles. The District shall inspect the dog park at least once per week for dog waste that has not been removed and shall collect the dog waste and place it in the trash receptacles. Dog waste bag dispensers shall be inspected and restocked weekly, and trash receptacles shall be emptied weekly.</p>
NOI-1	<p><b>Construction Noise Reduction Measures.</b> Construction activity for site preparation and for future development shall be limited to the hours between 7:00 a.m. and 4:00 p.m., Monday through Friday. No construction shall occur on State holidays (e.g., Thanksgiving, Labor Day). Construction equipment maintenance shall be limited to the same hours.</p>
WIL-1	<p><b>Wildfire Hazard Remediation.</b> In the event that the property is affected by a wildfire, the District shall consult with Calfire and/or the Cloverdale Fire Protection District to determine the degree to which the wildfire has affected the project property, including consideration of potential slope instability and potential hazards associated with tree health. If recommended by Calfire and/or the Cloverdale Fire Protection District, the District shall retain a qualified geotechnical engineer to evaluate soil and slope conditions of areas affected by wildfire activity, including wildfire that occurred adjacent to but not within the project property, and to recommend remediation activities for any identified hazardous conditions. Further, the District shall conduct public outreach and post signs around the perimeter of the property notifying the public that use of the fields is prohibited until the assessment and any necessary remediation activities are complete.</p>

# 3 Initial Study Checklist

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**1. Project title:**

Cloverdale Unified School District South Fields project

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

Cloverdale Unified School District  
97 School St  
Cloverdale, CA 95425

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

Contact: Superintendent Betha MacClain  
Phone: (707) 894-1920  
Email: macclainb@cusd.org

**4. Project location:**

Figure 1 provides a map of the proposed project region. The District-owned project property is currently located within Sonoma County. It is also within the southernmost portion of the City of Cloverdale's Sphere of Influence and Urban Growth Boundary.

As shown in Figure 2, Project Property and Vicinity, the project property is located west of Dutcher Creek Road, between two unpaved roads both signed as Kelly Road. The Assessor's Parcel Number (APN) is 117-040-055. The project property is located in the Cloverdale, California United States Geological Survey (USGS) 7.5-Minute Topographical Quadrangle, Township 11 North, Range 10 West, Section 30 Mt. Diablo Base and Meridian.

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

Cloverdale Unified School District  
97 School St  
Cloverdale, CA 95425

**6. General plan designation:**

The General Plan and zoning designations for the project property are shown on Figure 3.

*Sonoma County General Plan Land Use Designation:* Rural Residential, with Light Industrial on the flagpole portion of the lot that extends to Dutcher Creek Road

*City of Cloverdale: General Plan Land Use Designation* General Industry (eastern portion), Low Density Residential and Conservation (western portion)

**7. Zoning:**

*Sonoma County Zoning:* Agricultural and Residential (AR-B8) and Scenic Resources Combining District/Valley Oak Habitat Combining District (SR-VOH) (western portion); Rural Residential (RR-B8, RRD-B6-40) (eastern portion); and Limited Urban Industrial (M1-B8) (flagpole portion)

**8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

The CUSD South Fields Project (project) would construct athletic fields on a portion of a vacant property at the south end of the City of Cloverdale. The project site location is identified in Figure 1, Regional Location, and Figure 2, Project Site.

The project is proposed by the District to develop a sports field complex that would support existing District athletic programs and allow community use outside of school hours. As shown on Figure 3, Site Plan, the sports fields would include a joint purpose baseball/soccer field and a joint purpose softball/soccer field located in the eastern portion of the site extending from the northern property boundary through the center of the property; the dog park would be established in the western portion of the site near the northern property boundary; and a parking lot, concession stand, and restrooms would be constructed in the eastern portion of the site near the southern property boundary.

The proposed project would support existing District existing athletic programs by providing additional programming space to facilitate practices and games for the baseball, softball, and soccer teams at Cloverdale High School and Washington Middle School. The existing fields at these two campuses are insufficient to meet all of the athletic program needs because there is currently not enough field space in the district for multiple teams to hold practices and games at the same time. Therefore, teams cannot practice as often as necessary or must practice at unreasonable hours. Further, there is no available space to expand sports fields at any of the District campuses.

In addition, the District would allow community use of the fields outside of school athletic program hours.

The project would develop approximately 9 acres of the 31-acre property, as show in Figure 3. The District is conducting feasibility and planning studies for other potential uses in the remainder of the property but has not identified funding or timing for future development or committed to any specific uses.

**Site Operations**

The CUSD South Fields project would support use by existing District athletic programs, including team practices and games. It is expected that the fields would be used for hosting two games per week during 8 months of each calendar year. Game attendance varies but generally includes 22 players per team and 12 to 30 spectators. Practices would occur three days per week during 8 months of each calendar year, with 22 students and up to 5 coaches per practice.

Public use of the fields may include practices for local soccer and baseball leagues three days per week on average with up to 22 team members, 3 coaches, and 20 spectators in attendance each day. Games would include 22 players per team and 12 to 30 spectators.

The athletic fields would be surfaced with turf and require irrigation which would be provided from the project site's connection to the City's water system.

### Site Access

Figure 2 identifies roads adjacent to the project site. Vehicular access to the site would be provided from Dutcher Creek Road/South Cloverdale Boulevard. Dutcher Creek Road extends to the south into Sonoma County while South Cloverdale Boulevard extends north into the City of Cloverdale. East of the project property (and the Sonoma County Vintners Co-op) and as it extends to the south, Dutcher Creek Road generally parallels U.S. Highway 101/State Route 128.

An existing unpaved County road on the south side of the project property, currently signed as Kelly Road, would be widened and paved as a public City of Cloverdale roadway. The widening and paving is proposed to be included in a separate project on the property adjacent to the south. This road extends to the west and southwest to provide access to the rural residential and agricultural uses in that area.

A second unpaved private road also signed as Kelly Road is present on the north side of the project property. This roadway is planned to be widened and paved to City standards as part of development of the adjacent Baumgardner Ranch project. It would end adjacent to the western portion of the athletic fields and would intersect with a southerly extension of the existing South Foothill Boulevard, also to be constructed as part of the Baumgardner Ranch project.

### Infrastructure

The proposed project would include installing storm drain lines beneath the athletic fields and piping the existing intermittent drainages that cross the project property. Stormwater runoff would be treated before entering the intermittent drainage south of the fields through an outfall. Water and sewer lines would be extended from Dutcher Creek Road/South Cloverdale Boulevard either along the northerly property boundary or through the southern portion of the property and the adjacent undeveloped parcel.

### Project Construction

Construction activities would occur during daylight hours, Monday through Friday, between approximately September and October 2021 and spring and summer 2022. Construction activities are expected to include:

- Vegetation clearing and grubbing – Cleared and grubbed vegetation would be removed and disposed of off-site.
- Rough grading, utility line trenching, utility line installation - The area with the deepest soil cuts would be near the northwest corner of the athletic fields, with cuts up to approximately 6 feet. The maximum fills would be up to approximately 12 feet and would occur in the southeast portion of the fields. Grading is expected to balance onsite; no soil import or export needed. Utility line would be routed easterly through the adjacent property or southerly to Kelly Road and then east to Dutcher Creek Road.
- Final grading – Final grading to ensure level fields and appropriate slopes for drainage would be completed.
- Paving and construction – To include paving parking lot, pouring foundation for concession stand and restroom, and constructing concession stand and restroom facility.
- Field surfacing/final improvements – Installation of natural turf, fencing, dugout/players benches, and landscaping.

### **Vegetation Removal**

The Project would require the removal of one large oak tree located within the easterly of the two proposed fields, as well as riparian vegetation, including oak trees, within and adjacent to the ephemeral and intermittent drainages within the project site.

### **Materials Storage Areas and Equipment Staging**

Construction equipment and materials would be staged within the project property during construction. Staging areas would be located within areas proposed to be graded or in other portions of the project property that are at least 50 feet from any intermittent or ephemeral drainage and outside of the dripline of any existing trees that are not proposed to be removed from the site. After construction, any materials not used or reused in the proposed project would be hauled off-site and reused or disposed of in a landfill or recycled at a recycling facility.

### **Onsite Drainage and Erosion Control**

The proposed project would be required to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit, which includes preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The proposed project would also implement commonly used best management practices (BMPs) for erosion control, including fiber wattles and silt fencing, covering exposed soil piles, and mulching disturbed areas during construction.

The project proposes to install drainage pipes below the athletic fields to convey natural drainage from the northern and western portions of the site as well as runoff from the fields to the intermittent drainage south of the proposed fields. The pipe would outfall into the intermittent drainage in the southeastern portion of the project site. The outfall is proposed to be armored with rip rap. Additional stormwater treatment measures would be identified in the project SWPPP.

### **Landscaping**

The project proposes to provide natural turf landscaping for all athletic fields, and to revegetate areas that are disturbed during grading.

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

The property immediately north of the project property contains a single-family residence, various outbuildings, and a barn. That property has recently been approved for a residential development called Baumgardner Ranch, as indicated on Figure 2. Development of Baumgardner Ranch would include annexing that project site into the City of Cloverdale, bringing the city boundary adjacent to the CUSD South Fields project property. The City approved redesignating the Baumgardner Ranch site to High Density Residential and granted a Planned Unit Development permit to construct 304 homes. The Sonoma County Local Agency Formation Commission has recently approved annexation of the Baumgardner Ranch site into the City of Cloverdale.

The property east of the northern portion of the CUSD South Fields site is currently under development of the Sonoma County Vintners Co-op, as indicated on Figure 2. This development consists of a large warehouse building and associated parking. There is a Payless storage facility adjacent to the northeastern corner of the site and, further east, a Renner Petroleum gas station that fronts on South Cloverdale Boulevard. A separate development



project is anticipated to be proposed for the adjacent property to the south that would include annexation of the CUSD South Fields project property to the City.

Commercial/light industrial uses (equipment rental and farm supply) are present to the southeast of the project property while rural residential and agricultural uses are present to the south and southwest. The property immediately south has the rural residential (RR-5) land use designation.

**10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

The following permits and approvals could be required to carry out the proposed project:

- Sonoma County Grading Permit
- Regional Water Resources Control Board, North Coast Region NPDES General Permit
- U.S. Army Corps of Engineers Nationwide Permit for impacts to federally-protected wetlands
- California Department of Fish and Wildlife, Streambed Alteration Agreement
- Regional Water Resources Control Board, North Coast Region Clean Water Act Section 401 Water Quality Certification for impacts to federally-protected wetlands and waters of the State

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

**Note:** Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The District has not received any requests for notification under Public Resources Code section 21080.3.1. In preparing the Cultural Resources Inventory Report for this project, Dudek contacted the Northwest Information Center, the Native American Heritage Commission, and the Native American tribal representatives included on the recommended tribal contact list provided by the Native American Heritage Commission. No known Tribal Cultural Resources or Sacred Lands were identified by any of the parties contacted.

### Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated throughout the Initial Study analysis that follows. Where the project would have a potentially significant impact, mitigation measures are identified in this Initial Study to ensure that impacts would be avoided, minimized, and/or compensated for, resulting in impacts that are **less than significant with mitigation incorporated**.

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

**Determination (To be completed by the Lead Agency)**

On the basis of this initial evaluation:

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



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Betha MacClain, Superintendent  
Cloverdale Unified School District

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June 14, 2021

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### 3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS</b> – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Setting

The approximately 31-acre vacant project property is located in Sonoma County, within the southernmost portion of the City of Cloverdale's Sphere of Influence and Urban Growth Boundary. As shown in Figures 1 and 2, the property is located west of U.S. Highway 101 (Redwood Highway)/State Route (SR) 128 and South Cloverdale Boulevard/Dutcher Creek Road.

The City of Cloverdale is located in a small, flat valley running roughly north to south following the Russian River and surrounded by gently rolling hills covered with oak trees, grassland, and other vegetation. Redwood Highway runs the length of the City. In the area south of the project property, views from Redwood Highway and Dutcher Creek Road are of rolling topography, natural vegetation (grasses, shrubs, and trees), and sparse areas of development, including agricultural, rural residential, commercial and industrial land uses. Closer to the project property, views from Redwood Highway and South Cloverdale Boulevard/Dutcher Creek Road include more steeply sloped and heavily treed foothills in the background of views to the north and west with industrial and heavy commercial land uses along South Cloverdale Boulevard/Dutcher Creek Road in the foreground. The Sonoma County Vintner's Co-op and other existing development north of the project property obscures many of the potential direct views of the property from both Redwood Highway and Dutcher Creek Road, although views of the property are available from the south. In the immediate vicinity of the project property, eastward views from Redwood Highway consist of continued rolling topography and vegetation. Further north along Redwood Highway, westward views from Redwood Highway are limited to the upward sloping embankment.

Topography of the eastern portion of the project property is mostly flat. This portion of the property is crossed by an intermittent drainage that flows from north to south, and a second intermittent drainage that flows from west to east and is tributary to the north-south drainage. There is limited vegetation within and adjacent to these drainages, and a single large oak tree on the northern side of this portion of the property. The western portion of the project property includes a large hill covered with an oak woodland vegetation community. Views of the project site are provided in Figure 4, Site Photos.

As shown in Figure 2, the parcels north and south of the project property are currently predominantly vacant, other than rural residences, a barn, and various outbuildings. The Baumgardner Ranch residential development has been approved for construction on the parcel to the north. The parcel east of the northern portion of the project property is currently under construction for the Sonoma County Vintner's Co-op. There is a Payless storage facility adjacent to the northeastern corner of the site and, further east, a Renner Petroleum gas station that fronts on South Cloverdale Boulevard.

Commercial/light industrial uses (equipment rental and farm supply) are present to the southeast of the project property while rural residential and agricultural uses are present to the south and southwest.

There are no officially designated state scenic highways within the city limits of Cloverdale or Sonoma County around Cloverdale; therefore, the proposed project is not within the viewshed of any state scenic highways (Caltrans 2018).

## Impact Discussion

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

A scenic vista is defined as an expansive view of a scenic setting, whether that setting is natural or constructed. The City of Cloverdale General Plan identifies the agricultural lands and hillsides around the perimeter of the city as scenic resources (City of Cloverdale 2010); thus, views of these resources could be considered scenic vistas. Views of and past the site from Dutcher Creek Road (which is an extension of South Cloverdale Boulevard) and from Redwood Highway include the hillside within the western portion of the project property and the surrounding hillsides. However, these views are partially obstructed by the Sonoma County Vintner's Co-op, which is visible in some of the views presented in Figure 4, and other development along South Cloverdale Boulevard north of the project property.

The proposed project would construct athletic fields, a dog park, a small parking lot, and a small building to house a concession stand and restrooms. These features would not obstruct views of the hillsides and ridgelines to the west because the project elements would involve minimal vertical elements. Fencing around the two athletic fields would be chain link, which would not obstruct views. The concession stand and restroom would be located near the southern boundary of the project property and would be approximately 12 feet in height. Thus, while this building would be visible from portions of Dutcher Creek Road directly east of and south of the property, it would not obstruct background views of hillsides and ridgelines. The project would have **no impact** on any scenic vistas.

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

The portion of Redwood Highway through the City of Cloverdale is not designated as a scenic highway under the California Department of Transportation's California Scenic Highway Mapping System (Caltrans 2018).

However, the Sonoma County General Plan designates the section of Redwood Highway east of the project property as a scenic corridor (Sonoma County 2016). Views of the existing trees within the drainage channels onsite and the single large tree north of the drainage channel are possible from portions of Redwood Highway south and north of the project property, however these elements are indistinct portions of the larger view of the wooded hills west of the site. Further, views to the project site from the highway are partially obstructed by the large warehouse building being constructed as the Sonoma County Vintner's Co-op, as indicated in Figure 4. Thus, removal of vegetation, grading, and construction of athletic fields would result in minor changes in the views possible from Redwood Highway and this impact would remain **less than significant**.

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

As shown in Figure 3, the project proposes to construct athletic fields in the eastern portion of the vacant project property. The sports fields would include a joint-purpose baseball/soccer field and a joint-purpose softball/soccer field. The project would also construct a parking lot, concession stand, and restrooms in the eastern portion of the property to support use of the fields, and a dog park for community use in the western portion of the project property. The project would require removal of one large oak tree near the center of the northern portion of the property and scattered trees and shrubs from the drainages in the eastern portion of the property. Areas that are disturbed during grading and construction but would not support any of the project elements would be revegetated. The project would not disturb vegetation within the existing oak woodland community on the western portion of the property.

The project property is currently vacant and supports livestock grazing. The property adjacent to the north is also currently largely vacant but is planned to be developed with 304 dwelling units and associated site improvements. Thus, the project property would represent a point of transition between urbanized and non-urbanized areas. As discussed above, the project property is visible from points along South Cloverdale Boulevard/Dutcher Creek Road and from Redwood Highway, although the Sonoma County Vintner's Co-op building obscures many views of the project property. The addition of developed athletic fields and the associated parking lot, concession stand, and restrooms would slightly alter the visual character of the site by introducing facilities that are more urban in nature than the existing undeveloped character of the site. However, the scenic resources provided by the hillside and oak woodland in the western portion of the project property would not be altered by the project. Thus, while the project would slightly alter the visual character of the project site, the visual character of the overall project property would not be substantially affected. Thus, this impact would remain **less than significant**.

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

No lighting of the athletic fields or parking lot is proposed. There would be exterior lights at the entrances to the restrooms for safety. The restrooms would be located on the north side of the parking lot, which would be located near the southern property boundary. The restroom security lights would face the interior of the project property and would light only the immediate entrance area. Light would not reach any of the property boundaries. Construction may occur over nighttime hours and would introduce temporary sources

of light within the project site, but construction activities during nighttime would be short term, if necessary at all. None of the project components would be constructed with reflective surfaces. Therefore, the project would have **no impact** associated with light or glare.

### Mitigation Measures

No mitigation measures are required.

## 3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>II. AGRICULTURE AND FORESTRY RESOURCES</b> – 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 Department 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



## Setting

The project property is located within Sonoma County and within the City of Cloverdale Sphere of Influence and Urban Growth Boundary. The Sonoma County General Plan land use designation for the property is Rural Residential (Sonoma County 2013). The City of Cloverdale General Plan designations for the property are Low Density Residential and Conservation in the western portion of the property and General Industry in the eastern portion of the property (City of Cloverdale 2019). The Sonoma County zoning designations for the site includes Agricultural and Residential (AR-B8) along with the Scenic Resources Combining District/Valley Oak Habitat Combining District (SR-VOH) on the western portion of the site; Rural Residential (RR-B8, RRD-B6-40) on the eastern portion of the site; and Limited Urban Industrial (M1-B8) for the flagpole portion of the lot that extends to Dutcher Creek Road (Sonoma County 2021a). Because the property is outside of the City limits, there are no City of Cloverdale zoning designations for the site.

The project site is currently used for grazing. An oak woodland is present in the western portion of the property, but the proposed project would not remove trees from this area.

## Impact Discussion

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

The California Farmland Mapping and Monitoring Program designates the land on the project property as “Other Land” (Department of Conservation 2020). The project property does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and thus the project would have **no impact** because it would not convert any of these types of farmland to non-agricultural uses.

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

As noted in the Setting section above, the western portion of the project property is zoned by Sonoma County Agricultural and Residential (AR-B8). This zoning designation is intended to “provide lands for raising crops and farm animals in areas designated primarily for rural residential use” (Sonoma County 2021b). There are no existing agricultural or residential activities in the western portion of the property. Most of the proposed project components would be developed in the eastern portion of the property. Only the proposed dog park would be located within the AR-B8 zoned area.

The eastern portion of the property is currently used as grazing land; it is not under a Williamson Act contract. As part of annexation to the City as part of a separate development project anticipated to be proposed for the adjacent property to the south, the project property would be zoned under the City’s zoning ordinance, which would result in the loss of approximately 18 acres of AR-B8 zoned land within the County. This portion of the project property has limited opportunity for intensive agricultural use due to its topography and because this portion of the site is also designated with the Valley Oak Habitat Combining District, which restricts the removal of oak trees from the oak woodland present in this area. Therefore, the project would have a **less than significant impact** because while it would result in the loss of approximately 18 acres of AR-B8 zoned land, this land is not well-suited to agricultural production and its loss would not substantially reduce agricultural opportunities or activities within the County.

- c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

The project would not occur on land zoned or designated as forestland or timberland or zoned Timberland Production. Therefore, there will be **no impact**

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

The project site supports approximately 15 acres of oak woodland but none of the proposed project components would result in disturbance to the oak woodland or removal of trees within this woodland. The project would not result in permanent loss or conversion of forest land, and therefore, would have **no impact** associated with loss of forest land.

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

The project consists of construction of sports fields, a dog park, and associated facilities and infrastructure that would serve existing students and the needs of the surrounding community. The eastern portion of project property is currently used for grazing, the western portion supports an oak woodland. There is no other farmland, agricultural, or forest lands or activities within or adjacent to the site. The proposed sports fields and associated facilities would not increase the potential for conflicts with any agricultural activities on other parcels in the project vicinity and would not increase the likelihood for such parcels to be converted to non-agricultural or non-forest uses. Thus, implementation of the proposed project would not indirectly result in the conversion of farmland or forest land to non-agricultural or non-forestland uses. Therefore, **no impact** would occur.

#### Mitigation Measures

No mitigation measures are required.

### 3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Setting

The project property is located within the jurisdiction of the Northern Sonoma County Air Pollution Control District (NSCAPCD) and within the North Coast Air Basin (NCAB). The NCAB is in attainment for all state and federal ambient air quality standards. Therefore, the NSCAPCD has not adopted thresholds of significance for use in CEQA projects for evaluating construction or operational impacts related to air quality. However, the NSCAPCD does recommend the use of the neighboring Bay Area Air Quality Management District's (BAAQMD) thresholds (BAAQMD 2017). Additionally, the City of Cloverdale has utilized the BAAQMD California Environmental Quality Act Air Quality Guidelines in its recent CEQA documentation. Thus, the significance thresholds utilized in this analysis to evaluate air quality impacts are based on the BAAQMD thresholds established in the BAAQMD CEQA Air Quality Guidelines. These BAAQMD significance thresholds are summarized in Table 3.1-1 (BAAQMD 2017).

**Table 3.3-1. Air Quality Thresholds of Significance**

	Construction Thresholds	Operational Thresholds	
Pollutant	Average Daily Emissions (lbs/day)	Average Daily Emissions (lbs/day)	Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO <sub>x</sub>	54	54	10
PM <sub>10</sub>	82 (exhaust)	82	15
PM <sub>2.5</sub>	54 (exhaust)	54	10
PM <sub>10</sub> /PM <sub>2.5</sub> (fugitive dust)	Best Management Practices	None	
Local CO	None	9.0 ppm (8-hour average, 20.0 ppm (1-hour average))	
Risks and Hazards (Individual Project)	Compliance with Qualified Community Risk Reduction Plan or Increased cancer risk of >10.0 in 1 million Increased noncancer risk of >1.0 Hazard Index (chronic or acute) Ambient PM <sub>2.5</sub> increase >0.3 µg/m <sup>3</sup> annual average Zone of Influence: 1,000-foot radius from property line of source or receptor		
Risks and Hazards (Cumulative)	Compliance with Qualified Community Risk Reduction Plan or Cancer risk of >100 in 1 million (from all local sources) Noncancer risk of >10.0 Hazard Index (chronic, from all local sources) Ambient PM <sub>2.5</sub> >0.8 µg/m <sup>3</sup> annual average (from all local sources)		

Table 3.3-1. Air Quality Thresholds of Significance

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs/day)	Average Daily Emissions (lbs/day)	Maximum Annual Emissions (tons/year)
	Zone of Influence: 1,000-foot radius from property line of source or receptor		
Accidental Release of Acutely Hazardous Air Pollutants	None	Storage or use of acutely hazardous material located near receptors or new receptors located near stored or used acutely hazardous materials considered significant	
Odors	None	Five confirmed complaints to NSCAPCD per year averaged over 3 years	

Source: BAAQMD 2017

Notes: lbs/day = pounds per day; tons/year = tons per year; ppm = parts per million;  $\mu\text{g}/\text{m}^3$  = micrograms per cubic meter; ROG = reactive organic gases;  $\text{NO}_x$  = oxides of nitrogen;  $\text{PM}_{10}$  = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less;  $\text{PM}_{2.5}$  = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; CO = carbon monoxide.

In general, the BAAQMD significance thresholds for reactive organic gases (ROG), oxides of nitrogen ( $\text{NO}_x$ ), particulate matter with an aerodynamic resistance diameter of 10 micrometers or less ( $\text{PM}_{10}$ ), particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less ( $\text{PM}_{2.5}$ ), and carbon monoxide (CO) address the first three air quality significance criteria listed above. The BAAQMD maintains that these thresholds are intended to maintain ambient air quality concentrations of these criteria air pollutants below state and federal standards and to prevent a cumulatively considerable contribution to regional nonattainment with ambient air quality standards. The TAC thresholds (cancer and noncancer risks) and local CO thresholds address the third significance criterion, and the BAAQMD odors threshold addresses the fourth significance criterion.

## Impact Discussion

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

Generally, if the recorded concentrations of a pollutant are lower than the relevant standard, the area is classified as “attainment” for that pollutant. If an area exceeds the standard, the area is classified as “nonattainment” for that pollutant. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as “unclassified” or “unclassifiable.” The designation of “unclassifiable/attainment” means that the area meets the standard or is expected to be meet the standard despite a lack of monitoring data. These standards are set by the U.S. Environmental Protection Agency (EPA) or California Air Resources Board (CARB) for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or public welfare with a margin of safety. Areas of the state that are designated as nonattainment for one or more National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) required under the federal and state clean air acts to develop air quality plans meeting specific requirements depending on the severity of the pollution problem (CARB 2021).

The project property is located within the NCAB, which has been designated as attainment or unclassified for all state and federal ambient air quality standards. Therefore, the NSCAPCD has not adopted, or implemented an attainment plan for any pollutant and there is no applicable air quality plan that project would conflict with or obstruct. Thus, there would be **no impact**.

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

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate emissions from the project's construction and operation. CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant and GHG emissions associated with the construction and operational activities from a variety of land use projects, such as residential, commercial, recreational and industrial facilities. CalEEMod input parameters, including the project land use type and size and construction schedule, were based on CUSD information or default model assumptions if project specifics were unavailable.

**Construction.** Construction of the project would involve the construction and operation of athletic fields and associated infrastructure totaling approximately nine acres. The athletic fields would include a joint purpose baseball/soccer field, a joint purpose softball/soccer field, a dog park, a small parking lot, restrooms and a concession stand. Construction is anticipated to occur between 2021 and 2022. Construction activity would be intermittent during that period, and the total duration of construction is anticipated to be approximately 14 months.

Sources of construction emissions at the project site would include: off-road construction equipment exhaust, on-road vehicles exhaust and entrained road dust (i.e., material delivery trucks and worker vehicles), fugitive dust associated with site preparation and grading activities, and paving and architectural coating activities. Detailed assumptions associated with project construction are included in Appendix A, CalEEMod Calculations.

Average daily emissions were computed by dividing the total construction emissions by the number of active construction days, which were then compared to the BAAQMD construction thresholds of significance. Table 3.3-2 shows average daily construction emissions of O<sub>3</sub> precursors (ROG and NO<sub>x</sub>), PM<sub>10</sub> exhaust, and PM<sub>2.5</sub> exhaust during project construction.

**Table 3.3-2. Average Daily Unmitigated Construction Emissions**

Year	ROG	NO <sub>x</sub>	PM <sub>10</sub> Exhaust	PM <sub>2.5</sub> Exhaust
	<i>pounds per day</i>			
2021 - 2022	2.96	24.50	1.10	1.02
<i>BAAQMD Construction Thresholds</i>	54	54	82	54
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

**Source:** Appendix A

**Notes:** The values shown are average daily emissions based on total overall tons of construction emissions, converted to pounds, and divided by 300 active workdays.

ROG = reactive organic gases; NO<sub>x</sub> = oxides of nitrogen; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter

As shown in Table 3.3-2, construction of the project would not exceed the significance thresholds. Therefore, criteria air pollutant emissions during construction would be **less than significant**.

**Operations.** Operation of the project would generate criteria pollutant (including ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) emissions from mobile sources (vehicular traffic), area sources (consumer products, architectural coatings, landscaping equipment), and energy sources (lighting for the parking lot and restrooms). CalEEMod was used

to estimate daily emissions from project-related operational sources. The CalEEMod default trip rates were utilized. Table 3.3-3 summarizes the daily mobile, energy, and area emissions of criteria pollutants that would be generated by project development and compares the emissions to BAAQMD operational thresholds.

**Table 3.3-3. Daily Unmitigated Operational Emissions**

	ROG	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Source	<i>pounds per day</i>			
Area	0.17	<0.01	<0.01	<0.01
Energy	<0.01	0.02	<0.01	<0.01
Mobile	0.29	1.36	0.91	0.25
Total	0.51	1.38	0.91	0.25
<i>BAAQMD Operational Thresholds</i>	54	54	82	54
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

**Source:** Appendix A

**Note:** The values shown are the maximum summer or winter daily emissions results from CalEEMod.

ROG = reactive organic gases; NO<sub>x</sub> = oxides of nitrogen; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter

<sup>a</sup> <0.1 = value less than reported 0.1 pounds per day.

As indicated in Table 3.3-3, project-related operational emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> would not exceed the BAAQMD significance thresholds during operations, and thus, the project would have a **less-than-significant impact** in relation to regional operational emissions.

In regard to localized CO concentrations, according to the BAAQMD thresholds, a project would result in a less-than-significant impact if the following screening criteria are met:

1. The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
2. The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
3. The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

The project would generate minimal traffic trips as described in Section 3.17, Transportation, and would comply with the BAAQMD screening criteria. Accordingly, project-related traffic would not exceed CO standards and therefore, no further analysis was conducted for CO impacts. This CO emissions impact would be **less than significant** for the project as well as the cumulative scenario.

Past, present, and future development projects may contribute to the region's adverse air quality impacts on a cumulative basis. Per BAAQMD CEQA Guidelines, by 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. 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 considered cumulatively considerable, resulting in

significant adverse air quality impacts to the region's existing air quality conditions. Therefore, if the project's emissions are below the BAAQMD thresholds or screening criteria, then the project's cumulative impact would be **less than significant**.

As described previously, criteria pollutant emissions generated by short-term construction and long-term operations of the project would not exceed the BAAQMD significance thresholds. Thus, the project would have a **less-than-significant** cumulative impact in relation to regional emissions. In addition, project-related traffic would not exceed the BAAQMD CO screening criteria and would result in a **less-than-significant** cumulative impact with regard to localized CO.

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

The NSCAPCD has adopted project and cumulative thresholds for three risk-related air quality indicators for sensitive receptors: cancer risks, noncancer health effects, and increases in ambient air concentrations of PM<sub>2.5</sub>. These impacts are addressed on a localized rather than regional basis and are specific to the sensitive receptors identified for the project. Sensitive receptors are groups of individuals, including children, the elderly, the acutely ill, and the chronically ill, that may be more susceptible to health risks due to chemical exposure, and sensitive-receptor population groups are likely to be located at hospitals, medical clinics, schools, playgrounds, childcare centers, residences, and retirement homes (BAAQMD 2017). The closest existing sensitive receptors to the project property is an existing residence located approximately 370 feet to the northwest.

"Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period would contract cancer based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology.(OEHHA 2015). In addition, some TACs have non-carcinogenic effects. TACs that would potentially be emitted during construction activities would be diesel particulate matter, emitted from heavy-duty construction equipment and heavy-duty trucks. Heavy-duty construction equipment and diesel trucks are subject to CARB air toxic control measures to reduce diesel particulate matter emissions. According to the OEHHA, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Thus, the duration of proposed construction activities (approximately 14-months) would only constitute a small percentage of the total 30-year exposure period.

Regarding long-term operations, the project would include the operation of sports fields and ancillary facilities. The project would not include any stationary sources that would emit air pollutants or TACs.

In summary, the project would not expose sensitive receptors to substantial, long-term pollutant concentrations or health risk during construction or operations, and this impact would be **less than significant** for the project as well as the cumulative condition.

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

BAAQMD has identified typical sources of odor in the CEQA Air Quality Guidelines, a few examples of which include manufacturing plants, rendering plants, coffee roasters, wastewater treatment plants, sanitary landfills, and solid waste transfer stations. While sources that generate objectionable odors must comply

with air quality regulations, the public's sensitivity to locally produced odors often exceed regulatory thresholds. As previously discussed, the project site would consist of athletic fields and ancillary facilities. None of the project components would generate odors that would affect a substantial number of people. Therefore, the project would result in **no impact**.

### Mitigation Measures

No mitigation measures are required.

## 3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES – Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



## Setting

The analysis and mitigation measures in this section are based on the Biological Resources Assessment prepared by Dudek for the project site, which is provided in Appendix B, and based on the Aquatic Resources Delineation Report prepared by Dudek, which is provided in Appendix C.

The project property is located in the Alexander Valley, on the west side of the Russian River. Elevations within the project site vary from approximately 320 feet above mean sea level in the southeastern portion of the project site to approximately 400 feet above mean sea level in the southwestern portion of the site. Topography in the project site consists primarily of grasslands that are gently sloping downhill from the west to the east. The eastern portion of the property contains gently sloping pastureland with an individual large oak tree as well as drainages that support scattered trees and riparian vegetation. The western portion of the project property contains rolling hills that support oak woodland and grassland. The eastern portion of the project property has recently been used for grazing and pasture.

As shown on Figure 5, Vegetation Communities and Land Covers and Figure 6, Potentially Jurisdictional Aquatic Resources, the land cover within the study area includes natural vegetation communities, as well as aquatic land cover types. The vegetation communities and land cover types supported onsite consist of non-native grassland (13.61 acres), mixed oak woodland (1.78 acres), blue oak woodland (1.55 acres), disturbed/developed (0.16-acre), and coyote brush scrub (0.11-acre). The aquatic land cover types consist of ephemeral drainages (0.05-acre), intermittent drainages (0.96-acre), and seasonal wetland swales (0.03-acre).

Because the project property is currently undeveloped and has not been disturbed by grading or other ground disturbance activities, hydrology within the property is relatively undisturbed. Surface run-off in the property is directed to two seasonal wetland swales and two ephemeral drainages that flow into an intermittent drainage, which exits the property in the southeast corner of the project site. The intermittent drainage flows into a ditch along the eastern margin of the property and eventually into Icaria Creek located south of the site, which is tributary to the Russian River east of the project site. The study area supports 0.14-acre (2,421 linear feet) of waters that are anticipated to meet the criteria for jurisdictional waters of the U.S, subject to verification by the San Francisco District of the ACOE and 1.04 acres (3,091 linear feet) of waters anticipated to meet the criteria for jurisdictional waters of the state under the joint jurisdiction of the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW). An additional 1.02 acres of riparian woodland is anticipated to fall under CDFW jurisdiction.

Results from searches of the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) database revealed 28 special-status plant species that have potential to occur in the database search area (refer to Appendix B for details on the database search areas). Eight special-status plant species have a low to moderate potential to occur in the project site, as discussed in response a) below. The project site provides poor to marginal habitat for these species due to the heavily grazed nature of the site and overall dominance of non-natural land cover types and non-native plants.

No special-status wildlife species were documented onsite during two reconnaissance-level surveys in 2020 and 2021. Results of the CNDDB and U.S. Fish and Wildlife Service (USFWS) searches revealed 14 listed or special-status wildlife species, or species proposed for listing as rare, threatened, or endangered by either the CDFW or the USFWS that have potential to occur in the database search area. Of these, 10 were removed from consideration due to lack of suitable habitat within or adjacent to the project site, or due to the project site being outside of the species' known range. As discussed in response a) below, the project site provides potential habitat for native bat

species, including three special-status bat species, and potential habitat for birds of prey and migratory birds, including the grasshopper sparrow (*Ammodramus savannarum*), a California Species of Special Concern. However, land covers onsite provide poor to marginal quality habitat for these species due to regular human disturbance and/or a lack of suitable microhabitat features.

There are twelve oak trees within the footprint of the proposed grading and site improvements. Most of these trees are within or adjacent to the intermittent drainages onsite. The largest, which has a trunk of approximately 60 inches in diameter, is located outside of the riparian vegetation, north of the east-west oriented drainage and near the northern property boundary. This tree is visible in Figure 2 and in photo 2 of Figure 4. Ten of the trees range in size from 8 to 20 inches in diameter, and one has a trunk diameter of 32 inches.

## Impact Discussion

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

### Plants

Results from searches of the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) database revealed 28 special-status plant species that have potential to occur in the database search area. Eight special-status plant species have a low to moderate potential to occur in the project site: bent-flowered fiddleneck (*Amsinckia lunaris*), narrow-anthered brodiaea (*Brodiaea leptandra*), Rincon Ridge ceanothus (*Ceanothus confusus*), congested-headed hayfield tarplant (*Hemizonia congesta* ssp. *Congesta*), thin-lobed horkelia (*Horkelia tenuiloba*), Colusa layia (*Layia septentrionalis*), beaked tracyina (*Tracyina rostrata*), and Santa Cruz clover (*Trifolium buckwestiorum*). The project site provides poor to marginal habitat for these species due to the heavily grazed nature of the site and overall dominance of non-natural land cover types and non-native plants. No special-status plant species were documented onsite during the field survey conducted in November 2020, however, the timing of the visit was outside the bloom period for most species. A floristic survey of the project site was conducted in May 2021, which is within the bloom period for any species with a low to moderate potential to occur in the project site. Reference populations of these plant species were checked to confirm blooming status. Again, none of these plants were observed onsite. Thus, no special-status plant species are expected to occur onsite.

### Wildlife

The project site was evaluated for its potential to support native bat species, including three special-status bat species; and birds of prey and migratory birds, including the grasshopper sparrow (*Ammodramus savannarum*), a California Species of Special Concern. However, land covers onsite provide poor to marginal quality habitat these species due to regular human disturbance and/or a lack of suitable microhabitat features.

Roosting Bats, including the Pallid bat, Townsend's Big-eared Bat, and Western Red Bat. Roosting bats have a low potential to occur in the project site. There are no caves, lava tubes, hollow trees, abandoned buildings, or tunnels on the project site. It is unlikely that these species would utilize trees for roosting, as they are located adjacent to areas of regular human disturbance. None of these species were detected and no evidence of roosting (e.g., guano, urine stains, and insect prey remains) was noted in the project site

during the November 2020 or May 2021 field visits. Thus, no special-status wildlife species (other than nesting birds as discussed below) are expected to occur onsite.

Nesting and Migratory Birds and Birds of Prey, including the Grasshopper Sparrow. Trees, shrubs, and grasslands in and adjacent to the project site provide potential nesting habitat for birds of prey and local and migratory birds, including the grasshopper sparrow. Migratory bird species are protected by the federal Migratory Bird Treaty Act (MBTA) and native birds of prey are protected by Section 3503.5 of the California Fish and Game Code (CDFW 2018b). None of these species were detected during the November 2020 or May 2021 field surveys, except for common and migratory birds protected by California Fish and Game Code and/or the MBTA. Construction activities could disturb nesting and breeding birds in trees within and around the construction site. Potential impacts to special-status and migratory birds that could result from the construction and operation of the project include the destruction of eggs or occupied nests, mortality of young, and the abandonment of nests with eggs or young birds prior to fledging. If these species were found to be present, impacts to these species would be significant. To avoid adverse effects on nesting birds during construction of the proposed project, pre-construction nesting bird surveys and avoidance measures shall be implemented pursuant to Mitigation Measure BIO-1: Pre-Construction Nesting Bird Surveys and Reporting. With implementation of this mitigation measure to avoid impacts to nesting birds, this impact would be **less than significant with mitigation incorporated**.

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

Implementation of the proposed project would result in ground disturbance and direct, permanent changes to the project site. As previously discussed, the vegetation communities and land cover types identified onsite include riparian woodland, blue oak woodland, and grazed pasture. Riparian woodland within the project site (1.02 acres) is considered a sensitive natural community by CDFW. Construction of the project would result in direct impacts to approximately half of the riparian woodland because both of the proposed fields would be placed over sections of this community. In addition, the dog park is proposed adjacent to the westerly portion of the ephemeral drainage. Mitigation Measure BIO-2: Fencing and Best Management Practices would provide protection for the areas of riparian woodland within the study area that would be avoided by the project; this includes a requirement that the perimeter fencing for the dog park be placed at least 25 feet from the edge of the riparian woodland vegetation. Mitigation Measure BIO-3: Riparian Vegetation requires that the District obtain a Streambed Alteration Agreement from CDFW for any riparian vegetation removal and/or disturbance to the bed, bank, or channel of the intermittent drainage that may be necessary for project implementation to ensure that the project would result in no net loss of habitat functions and values. Mitigation Measure BIO-4: Vegetation Restoration requires the District to restore areas where temporary (construction-only) impacts would occur through vegetation planting and invasive species eradication methods, and requires the District to plant new oak trees to offset the loss of habitat values from removal of twelve oak trees within the site. Implementation of these measures would ensure that there is no net loss in the habitat function and value of the riparian vegetation overhanging and adjacent to the site. Thus, the project would result in a **less than significant impact with mitigation incorporated**.

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

Since the study area is currently undeveloped and has not been disturbed by grading or other ground disturbance activities, hydrology within the study area is relatively undisturbed. One intermittent drainage originates to the southwest of the study area and flows in an easterly direction into another intermittent drainage that originates to the north of the study area. Two seasonal wetland swales and two ephemeral drainages convey flows in an easterly direction into the easternmost intermittent drainage, which exits the study area at the southeast corner, and flows via a ditch to Icaria Creek, a tributary to the Russian River.

As discussed in the Aquatic Resources Delineation Report provided in Appendix C and shown in Figure 6, the study area supports 0.14-acre (2,421 linear feet) of waters that are anticipated to meet the criteria for jurisdictional waters of the U.S, 1.04 acres (3,091 linear feet) of waters that are anticipated to meet the criteria for jurisdictional waters of the state, specifically CDFW and RWQCB, and an additional 1.02 acres of riparian woodland anticipated to fall under CDFW jurisdiction only. The proposed project would result in impacts to approximately 1.02 acres (1,611 linear feet) of the aquatic resources within the study area. The proposed project would be required to comply with any restrictions or modification by the ACOE, CDFW and RWCQB, as required by the permitting process.

Construction of the proposed project would result in direct impacts to both intermittent drainages within the project site. Temporary direct impacts to the intermittent drainage in the eastern portion of the project site would be necessary to install the drainage outfall structure and associated riprap or other erosion control measures. Permanent direct impacts to this intermittent drainage as well as the intermittent drainage that runs west to east near the northern portion of the project site would result from piping the portions of these drainages that would be below the proposed athletic fields. Direct permanent and temporary impacts to the intermittent drainages would be considered potentially significant without implementation of mitigation measures. Mitigation Measure BIO-5: Aquatic Resource Impact Permitting and Compensation requires the District to provide for restoration of wetland areas where these impacts occur. In addition, Mitigation Measure GEO-1: Stormwater Pollution Prevention Plan and Mitigation Measure HAZ-1: Spill Prevention Measures would reduce potential direct and indirect impacts to wetlands by ensuring that appropriate water quality and erosion protection measures are implemented throughout construction. Combined, these measures would ensure that direct and indirect impacts to state- and federally protected wetlands result in no net loss of the habitat function and value of wetlands and waters onsite and no impairment of the hydrologic function of the drainages and wetlands adjacent to the project property. Thus, the project would result in a **less than significant impact with mitigation incorporated**.

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

As discussed in the Biological Resources Assessment in Appendix B, the project property is bounded by a tilled field along the northwestern boundary. The property to the north has been approved for the Baumgardner Ranch residential development. Under that project, development would be setback from the segment of the intermittent drainage on that property, thus impacts to that segment of the drainage would be avoided except for placing the drainage in a culvert to pass under Kelly Road.

Southwest and south of the CUSD South Fields project property consists of relatively open oak woodland and non-native grassland areas that connect with similar habitat to the northwest, west, southwest, and south of the property. Some development is present to the east of the site between Redwood Highway and the property. Open grassland and scrub habitat is present to the southeast of the property. A few mature trees and some shrubs occur along portions of the intermittent drainage on the project site which provides limited cover and a potential link between habitats on site and habitats to the northwest, west and southwest of the project property. However, a majority of the project site itself is fenced to keep horses on the property and the drainage passes under Kelly Road located along the southern property boundary. These conditions reduce habitat connectivity through the project site.

The proposed project would place athletic fields over portions of the ephemeral and intermittent drainages within the project site, requiring removal of the associated vegetation and piping the drainages. This would preclude any wildlife movement or nursery sites within these drainages. While the western portion of the project property would remain in its current condition, the western portion supports a hill and oak woodland vegetation community which does not provide the same wildlife movement opportunity as a drainage. However, because of the limited habitat connectivity between the project property and adjacent properties, the loss of wildlife movement opportunity within the project site would be a **less than significant** impact.

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

The project is proposed by the District, which is also the Lead Agency for evaluation of the proposed project. The policies and ordinances of the City of Cloverdale and of Sonoma County are not binding on the District. Thus, no local policies or ordinances protecting biological resources would apply to the proposed project. Therefore, the project would have **no impact**.

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

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

**Mitigation Measures**

Refer to Section 3.7, Geology and Soils, for MM GEO-1: Stormwater Pollution Prevention Plan, and Section 3.9, Hazards and Hazardous Materials for MM HAZ-1: Spill Prevention Measures.

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

If any active nests are observed during surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest. The buffer distance will typically range from 50 to 300 feet and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of

construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.

**BIO-2 Fencing and Best Management Practices.** Prior to the initiation of ground disturbance activities, the limits of disturbance shall be fenced and sediment and erosion control measures shall be utilized, which could include, but not be limited to: biodegradable straw wattles free of weed seeds, silt fencing, or biodegradable erosion control mats/blankets. Fencing for the dog park shall be placed a minimum of 25 feet from the edge of the adjacent riparian woodland vegetation. No construction, staging, or other ground disturbance activities shall be permitted beyond the fencing.

**BIO-3 Riparian Vegetation.** A Streambed Alteration Agreement (SAA), pursuant to Section 1602 of the California Fish and Game Code, shall be procured from the California Department of Fish and Wildlife (CDFW) prior to any disturbances to riparian vegetation associated with the intermittent drainages onsite. As part of the SAA, compensatory mitigation a no less than a 1:1 ratio may be required to offset the loss of riparian habitat. If so, a mitigation plan shall be drafted by a qualified biologist to address implementation and monitoring requirements under the SAA to ensure that the project would result in no net loss of habitat functions and values. The plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, performance criteria, monitoring methods, and actions to be taken in the event that the mitigation is not successful. The plan shall be approved by the District and CDFW and any required compensatory mitigation shall take place either onsite or at an appropriate off-site location as approved by the CDFW and the District at a ratio directed by the SAA.

**BIO-4 Vegetation Restoration.** The District shall be responsible for developing and implementing a restoration plan for temporarily impacted areas of natural vegetation. The plan shall, at a minimum, include an implementation schedule, planting/seeding plan, invasive species eradication methods, interim and final success criteria/performance standards, estimated costs, and identification of responsible entities. Areas to be restored shall be identified by a qualified biologist as being able to feasibly support the proposed native revegetation. Feasibility of native revegetation is primarily based on suitable soils, slopes, and aspect, as well as the presence of similar vegetation adjacent to the proposed mitigation areas. Further, the restoration areas shall be preserved in perpetuity. If a substantially similar plan is required under permits issued by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board, development and implementation of that plan would meet the requirements of this measure.

In addition, the District shall be responsible for planting oak trees within the project property to replace the habitat values of the oak tree that is not within a riparian vegetation community and would be removed from the project site. This oak tree has a trunk diameter of 60 inches. The District shall plant one 15-gallon oak tree and one DeePot 40 oak tree OR 1-gallon oak tree for every 5 inches of trunk diameter. In total, the District shall plant 15 15-gallon oak trees and 15 DeePot 40 and/or 1-gallon oak trees.

**BIO-5 Aquatic Resource Impact Permitting and Compensation.** The District shall obtain an individual or nationwide permit from the Army Corps of Engineers (ACOE) prior to commencement of grading within 75 feet of any wetlands or other waters of the U.S. in the project property. As part of the

ACOE permit, compensatory mitigation may be required, at a ratio to be determined by the ACOE, to offset the loss of wetland/waters habitat. If so, and as part of the permit application process, a qualified biologist shall draft a mitigation and monitoring plan to address implementation and monitoring requirements under the permit to ensure that the project would result in no net loss of habitat functions and values. The plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, monitoring methods and performance criteria, extent of monitoring to be conducted, actions to be taken in the event that the mitigation is not successful, and reporting requirements. The plan shall be approved by ACOE and compensatory mitigation shall take place either on site or at an appropriate off-site location as approved by the ACOE.

Concurrent with the ACOE permit, the District shall also obtain a Water Quality Certification from the RWQCB, subject to the same mitigation plan requirements stated above. Any work within the bed or bank of the intermittent drainages, or within the abutting riparian woodland, would require authorization from CDFW under a California Fish and Game Code Section 1600 Streambed Alteration Agreement, as required under MM BIO-2. Trimming or removal of riparian vegetation may also require compensatory mitigation, as directed by MM BIO-3 and BIO-4.

## 3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES – Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

The analysis and mitigation measures in this section are based on the Cultural Resources Inventory Report prepared by Dudek for the project site, which is provided in Appendix D. A records search was completed for the proposed project boundaries. For the purposes of the Cultural Resources Inventory, the boundary around the proposed project components is referred to as the Area of Potential Effect (APE). The records search boundaries were extended one half-mile from the APE to serve as a buffer to ensure a robust understanding of the cultural resources setting and context for the APE. The records search was completed by staff at the Northwestern Information Center (NWIC) at Sonoma State University in Rohnert Park on November 23, 2020. The records search identified 36 previous studies which have been performed within a half-mile radius of the records search area, a single cultural resource with an approximate location intersecting the APE, and an additional 4 cultural resources within a half-mile of the APE.

The project property is currently undeveloped with unpaved roadways adjacent to the north and south property boundaries. The eastern portion of the property contains gently sloping pastureland with an individual large oak tree as well as drainages that support scattered trees and riparian vegetation. The western portion of the property contains rolling hills that support oak woodland and grassland.

Dudek Archaeologist Ross Owen, MA, RPA conducted an intensive-level pedestrian survey of the original project APE on November 25, 2020 using standard archaeological procedures and techniques and Dudek Archaeologist Nicholas Hanten, RPA, conducted an intensive-level pedestrian survey of the area in which the dog park is proposed to be located on May 6, 2021. Native ground surface visibility was variable and was restricted in some areas by grasses and other vegetation, but visibility was sufficient for gaining a representative sample for assessing the presence of cultural resources.

Neither of the intensive-level pedestrian surveys resulted in the identification of any archaeological sites or potentially significant cultural resources. A single glass bottle dating to the 20<sup>th</sup> century was identified within a seasonal drainage within the APE, aside from modern refuse no other cultural deposits were observed within the APE. Along the northern edge of the APE an historic barn is present on the opposite side of Kelly Road. Southwest of the barn is a culvert with a corrugated pipe stacked-stone construction that crosses beneath Kelly Road. The historic barn and culvert would not be impacted by the project as presently designed (Appendix D).

#### Impact Discussion

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

The proposed project would develop the existing vacant grassland with a sports field complex that would include a joint-purpose baseball/soccer field, a joint-purpose softball/soccer field, a dog park, a small parking lot, a concessions stand, and restrooms to support use of the fields.

There are no built features or elements within the project property. An historic barn is present on the opposite side of Kelly Road north of the project property and southwest of the barn is a culvert with a corrugated pipe and stacked-stone construction. These features are outside of the project property and the project is not anticipated to impact either the historic barn or the culvert. The proposed project would have **no impact** associated with changes in the significance of a historical resource.

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

The NWIC records indicated that no archaeological resources have been previously recorded within the project APE and immediate area. Dudek's archival research for the project indicates that there is a low sensitivity for encountering potential subsurface archaeological deposits.

The NAHC Sacred Lands File search did indicate that Native American resources are on file for the search area (comprised of the area within the 1 x 1 mile Section 7). No response to Dudek outreach attempts (outside of Graton Rancheria) has been received by this tribe or others on the NAHC Contact list. Tribal correspondence documents are included in Appendix D. See Section 3.18 Tribal Cultural Resources for further discussion.



Finally, the cultural resources pedestrian survey of the project area did not identify any archaeological sites or potentially significant cultural resources.

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

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

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

**Mitigation Measures:**

**CUL-1 Unanticipated Cultural Resources.** In the event that unanticipated discoveries are encountered during project construction, all activity shall cease within 50 feet of the find until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; PRC Section 21082) the archaeologist may record the find to appropriate standards (thereby addressing any data potential) and allow work to continue. If the archaeologist observes the discovery to be potentially significant under CEQA or Section 106 of the National Historic Preservation Act, additional efforts may be warranted as recommended by the qualified archaeologist. Examples of prehistoric resources may include: stone tools and manufacturing debris; milling equipment such as bedrock mortars, portable mortars, and pestles; darkened or stained soils (midden) that may contain dietary remains such as shell and bone; as well as human remains. Historic resources may include: burial plots; structural foundations; mining spoils piles and prospecting pits; cabin pads; and trash scatters consisting of cans with soldered seams or tops, bottles, cut (square) nails, and ceramics; paleontological resources.

**CUL-2 Discovery of Human Remains.** In accordance with Section 7050.5 of the California Health and Safety Code, if potential human remains are found, all work within 100 feet shall be suspended and the county coroner shall be immediately notified of the discovery. The coroner shall provide a determination within 48 hours of notification. No further excavation or disturbance of the identified material, or any area reasonably suspected to overlie additional remains, shall occur until a determination has been made. If the county coroner determines that the remains are, or are believed to be, Native American, they shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendent (MLD) from the deceased Native American. Within 48 hours of their notification, the MLD will recommend to the lead agency their preferred treatment of the remains and associated grave goods.

## 3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. Energy – Would the project:</b>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

Pacific Gas and Electric Company (PG&E) provides gas and electricity services in Sonoma County (PG&E 2014). PG&E provides electric services to 16 million customers, including 106,681 circuit miles of electric distribution lines and 18,466 circuit miles of interconnected transmission lines over a 70,000-square-mile service area that includes in Northern California and central California (PG&E 2021). PG&E receives electric power from a variety of sources. According to California Public Utilities Commission's (CPUC's) 2018 Renewable Portfolio Standard (RPS) Annual Report to the Legislature, 39% of PG&E's power came from eligible renewable energy sources in 2018, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources (CPUC 2019).

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

The project would convert the existing undeveloped landscape into athletic fields and associated improvements, including a joint-purpose baseball/soccer field, a joint-purpose softball/soccer field, a dog park, a small parking lot, a concessions stand, and restrooms to support use of the fields. These improvements are required to be compliant with all current Title 24 energy requirements. During construction activities, heavy equipment powered by diesel and gasoline would be used; however, per CARB's air toxic control measures that limit diesel equipment idling, construction equipment operators would be required to limit idling and other inefficient equipment use such that wasteful operation would not occur. In addition, during both construction and operation of the project, the District or their contractor would comply with all state regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act, as amended. During construction, all waste generated would be recycled to the maximum extent possible.

The project would be constructed to meet the demands of the existing District athletic programs as well as the general population of the City of Cloverdale. As discussed in Section 3.17, the proposed project would generate a less than significant amount of vehicle miles traveled (VMT) and would satisfy the existing and planned recreational needs of the District and community. Therefore, the project does not include wasteful, inefficient, or unnecessary energy resource consumption during project construction or operation. Therefore, the impact would be **less than significant**.

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

The project would follow applicable energy standards and regulations during the construction phases. In addition, the project would be built and operated in accordance with all existing regulations that are applicable at the time of construction. As such, while the project would require use of energy, impacts related to the project's potential to conflict with plans for renewable energy and energy efficiency would be **less than significant**.

**Mitigation Measures**

No mitigation measures are required.

## 3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS – Would the project:</b>				
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

The project property is located in the northernmost portion of Sonoma County, in Northern California. Northern California is known for having strong seismic activity because of the San Andreas Fault and its many sub-faults. According to the California Department of Conservation Geological Survey Regulatory Mapping System, the project property is not located in an Alquist-Priolo Earthquake Fault Zone. The closest Alquist-Priolo Earthquake Fault Zone is the Maacama Fault Zone, which is located approximately 4.5 miles east of the project property (Department of Conservation 2021). The Maacama Fault system is connected to the San Andreas Fault via the Roger-Creek-Healdsburg, Hayward, and Calaveras Faults to the south of the fault zone. The non-Alquist Priolo fault nearest to the project property is the Alexander-Redwood Hill fault zone located approximately 0.8 miles south of the project property (Department of Conservation 2021). This zone is a quaternary age fault zone. No active faults are located within or near the project property. The proposed project site relatively flat and is not located in an area with a high chance of liquefaction or landslides.

### Impact Discussion

- a) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*
  - ii) *Strong seismic ground shaking?*
  - iii) *Seismic-related ground failure, including liquefaction?*
  - iv) *Landslides?*

As noted above, the project property is located approximately 4.5 miles from the nearest any Alquist-Priolo Earthquake Fault Zone and there no active faults located on or proximate to the property. The project would have **no impact** associated with potential rupture of an known earthquake fault because there are no known fault lines within the project property that could rupture or lead to ground failure during a seismic event (Department of Conservation 2021).

Although there are no known active fault lines within or proximate to the project property, the City of Cloverdale General Plan recognizes that the City can experience strong seismic ground shaking. The project proposes to develop an athletic fields complex that includes a joint-purpose baseball/soccer field, a joint-purpose softball/soccer field, a dog park, a small parking lot, a concessions stand, and restrooms to support use of the fields. The concession stand and restrooms are required to be constructed in accordance with the current California Building Code, which includes building standards that reduce the risk of building collapse or substantial damage in the event of strong seismic ground shaking. Further, these buildings would be occupied by a few people at any one time and would be occupied for relatively short periods of time. Thus, while the site may be exposed to strong seismic ground shaking, impacts would remain **less than significant** because there would not be a substantial number of people at risk of injury due to building collapse or damage.

The project includes no elements that would increase the risk or susceptibility of the site to landslides and the potential for liquefaction is low to due to the lack of groundwater and the dense nature of the rock beneath the site. The project site includes only areas within the project property where topography is relatively flat; none of the project components are proposed within the hill that is present in the western portion of the property. The project would have **no impact** associated with risks of landslide and liquefaction.

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

The project would result in approximately 9 acres of ground disturbance, including grading for the athletic fields, trenching to install new stormdrain lines, trenching for utilities, and grading and paving for the parking lot, concession stand, and restrooms. Vegetation removal, grading, and trenching can expose soil to the potential for erosion due to wind and/or precipitation and storm drainage; further, such erosion could contribute to adverse water quality effects in the onsite drainage features. These impacts are considered potentially significant.

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

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

The project property is not located within an area with any known geologic or soil instability and the proposed project would construct athletic fields and associated infrastructure that would be constructed in accordance with applicable codes. The fields, dog park, parking lot, concession stand, and restrooms would not exert high loads on the ground surface and would not be expected to result in any increased risk of

ground failure. Therefore, impacts associated with an unstable geologic unit or soil would be **less than significant**.

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

While some areas of soils in the project region are known to have expansive properties, the proposed project would only construct one small building to house a concession stand and restrooms. These buildings would be occupied by a few people at any one time and would be occupied for relatively short periods of time. Thus, any effectiveness of expansive soil on the building would not result in substantial risks to life or property and impacts would remain **less than significant**.

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

The proposed project includes construction of restrooms and connection to the City's wastewater collection and treatment system. The project does not propose the use of a septic system or other alternative wastewater disposal. Thus the project would have **no impact**.

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

The project site contains no unique geologic features, such as rock outcroppings or mineral resources. Three soil types occur in the project property: Clear Lake Clay, 2 to 5 percent slopes, Positas gravelly loam, 0-9 percent slopes and Suther loam, 30 to 50 percent slopes. Clear Lake soils are generally very deep, poorly drained soils that formed in fine textured alluvium derived from mixed rock sources and are commonly found in flood basins, flood plains and in swales of drainageways (USDA 2018). Positas soils are deep and very deep, moderately well drained soils that formed in alluvial material from mixed rock sources. (USDA 2014). Suther soils are fine, mesic soils that are moderately deep and generally found over weathered sandstone (USDA 1997).

Soils in the project area are generally Quaternary alluvium (Qal) soil formations with some areas of Pleistocene formations, older sedimentary rocks of the Great Valley Complex, and metamorphic blocks of greenstone and serpentinite. Sedimentary soil units have potential to contain fossils, although no paleontological resources are known to occur within the project property or within 25 miles of the site (City of Cloverdale 2020).

Grading and trenching for project construction would be generally at a maximum depth of 8 feet, which would minimize the chance to uncover paleontological resources. However, it is possible that paleontological resources could be discovered during these activities. Destruction of paleontological resources would result in a potentially significant impact. Thus, Mitigation Measure GEO-2: Paleontological Resource Awareness Training is required to ensure that construction crews are educated on how to identify fossils and the correct procedure to follow if paleontological resources are found. Therefore, impacts would be **less than significant with mitigation incorporated**.

### Mitigation Measures

- GEO-1 Stormwater Pollution Prevention Plan.** In order to reduce runoff and erosion and minimize the potential of sedimentation as a result of the project, the District shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) for all construction activities.
- GEO-2 Paleontological Resources Awareness Training.** Prior to commencement of grading and construction permits, the District shall retain a professional Paleontologist to train the construction workers on how to determine the presence of fossils and the procedure to follow in the event paleontological resources are discovered.

## 3.8 Greenhouse Gas Emissions

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

### Setting

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind, lasting for an extended period (decades or longer). Gases that trap heat in the atmosphere are often called GHGs. The greenhouse effect traps heat in the troposphere through a threefold process: (1) short-wave radiation emitted by the Sun is absorbed by the Earth; (2) the Earth emits a portion of this energy in the form of long-wave radiation; and (3) GHGs in the upper atmosphere absorb this long-wave radiation and emit this long-wave radiation into space and back toward the Earth. This trapping of the long-wave (thermal) radiation emitted back toward the Earth is the greenhouse effect's underlying process.

Principal GHGs include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide, O<sub>3</sub>, and water vapor. Some GHGs, such as CO<sub>2</sub>, CH<sub>4</sub>, and nitrous oxide, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO<sub>2</sub> and CH<sub>4</sub> are emitted in the greatest quantities from human activities. Emissions of CO<sub>2</sub> are largely byproducts of fossil-fuel combustion, whereas CH<sub>4</sub> results mostly from off-gassing associated with agricultural practices and landfills. Manufactured GHGs, which have a much greater heat-absorption potential than CO<sub>2</sub> include fluorinated gases, such as hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride, which are associated with certain industrial products and processes (CAT 2006).

The Intergovernmental Panel on Climate Change (IPCC) developed the Global Warming Potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO<sub>2</sub>; therefore, GWP-weighted emissions are measured in metric tons of CO<sub>2</sub> equivalent (MT CO<sub>2</sub>e).

Neither the City of Cloverdale or NSCAPCD have adopted a qualified climate action plan or other CEQA thresholds for evaluating GHG impacts. The Sonoma County Regional Climate Protection Agency (SCRCP) adopted a climate action plan (CAP) in July 2016 (SCRCP 2016). However, the EIR for the CAP which would have enabled new developments to tier from EIR's GHG analysis was nullified after a court decision in July 2017 (Superior Court for the County of Sonoma 2017). Therefore, the NSCAPCD and the City of Cloverdale utilize the thresholds adopted by the BAAQMD for assessing GHG impacts.

Regarding impacts from GHGs, the California Air Pollution Control Officers Association (CAPCOA) consider GHG impacts to be exclusively cumulative impacts (CAPCOA 2008); therefore, assessment of significance is based on a determination of whether the GHG emissions from a project represent a cumulatively considerable contribution to the global atmosphere. This analysis uses both a quantitative and a qualitative approach. The quantitative approach is used to address the first significance criterion listed above. The quantifiable thresholds developed by BAAQMD were formulated based on Assembly Bill (AB) 32 and California Climate Change Scoping Plan reduction targets; these strategies will reduce GHG emissions statewide. Thus, a project cannot exceed a numeric BAAQMD threshold without also conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, if a project exceeds a numeric threshold and results in a significant cumulative impact, it would also result in a significant cumulative impact with respect to consistency with a plan, policy, or regulation, even though the project may incorporate measures or have features that would reduce its contribution to cumulative GHG emissions.

The BAAQMD establishes separate thresholds of significance for operational emissions from stationary sources (such as generators, furnaces, and boilers) and nonstationary sources (such as on-road vehicles). The threshold for stationary sources is 10,000 MT CO<sub>2</sub>e per year (i.e., emissions above this level may be considered significant). For nonstationary sources, the following three separate thresholds have been established:

- Compliance with a Qualified Greenhouse Gas Reduction Strategy (i.e., if a project is found to be out of compliance with a Qualified Greenhouse Gas Reduction Strategy, its GHG emissions may be considered significant).
- 1,100 MT CO<sub>2</sub>e per year (i.e., emissions above this level may be considered significant).
- 4.6 MT CO<sub>2</sub>e per service population per year (i.e., emissions above this level may be considered significant). (Service population is the sum of residents plus employees expected for a development project.)

This analysis uses the quantitative threshold of 1,100 MT CO<sub>2</sub>e annually. If the project GHG emissions would exceed this threshold, it would be considered to have a cumulatively considerable contribution of GHG emissions and a cumulatively significant impact on climate change.



**Impact Discussion**

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

**Construction.** Construction of the project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor (material delivery) trucks, and worker vehicles. Since the NSCAPCD or BAAQMD has not established construction-phase GHG thresholds, construction GHG emissions were amortized assuming a 30-year development life after completion of construction and added to operational emissions to compare to the BAAQMD operational GHG threshold. The project's amortized construction related GHG emissions would be 17.42 MT CO<sub>2</sub>e generated annually.

A detailed depiction of the construction schedule—including information regarding phasing, equipment utilized during each phase, vendor trucks, and worker vehicles—is included in Appendix A.

**Operations.** The proposed project would include the construction of athletic fields and associated developments, which would include a baseball field, soccer field, parking lot, restrooms, concession stand and maintenance area, open space, and dog park. Long-term operational emissions would occur over the life of the project. CalEEMod was used to estimate GHG emissions from motor vehicle trips, grid electricity usage, solid waste, and other sources (including area sources, natural gas combustion, and water/wastewater conveyance).

CalEEMod default mobile source data, including temperature, trip characteristics, variable start information, emission factors, and trip distances, were used for the model inputs. Project-related traffic was assumed to be comprised of a mixture of vehicles in accordance with the model defaults for city park and community center land use traffic. The CalEEMod default trip rate was utilized. It is conservatively assumed that the first year of project operation would be in the year 2023. CalEEMod was also used to estimate emissions from the project's area sources, which includes operation of gasoline-powered landscape maintenance equipment, which produce minimal GHG emissions.

The estimation of operational energy emissions was based on CalEEMod land use defaults and total area (i.e., square footage) of the project. Annual natural gas (non-hearth) and electricity emissions were estimated in CalEEMod using the emissions factors for Pacific Gas and Electric Company (PG&E) and adjusted to account for 39% renewable portfolio standard as of 2018. The most recent amendments to Title 24, Part 6, referred to as the 2019 standards, became effective on January 1, 2020. These standards are incorporated in the latest version of CalEEMod by including a 10% reduction in electricity use and a 1% reduction in natural gas use compared with the default values in CalEEMod.

Supply, conveyance, treatment, and distribution of water for the project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. Water consumption estimates for both indoor and outdoor water use and associated electricity consumption from water use and wastewater generation were estimated using CalEEMod default values. The project would generate a limited amount of solid waste and would therefore result in CO<sub>2</sub>e emissions associated with landfill off-gassing. Solid waste generation estimates were estimated with CalEEMod default values.

The estimated operational project generated GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, water supply, and wastewater treatment are shown in Table 3.8-1.

**Table 3.8-1. Estimated Annual Operational Greenhouse Gas Emissions**

Emission Source	CO <sub>2</sub> e (MT/yr)
Area	<0.1 <sup>a</sup>
Energy	13.78
Mobile	53.19
Solid Waste	2.81
Water Supply and Wastewater	5.42
<b>Total</b>	<b>75.20</b>
Amortized Construction Emissions	17.42
<b>Operation + Amortized Construction Total</b>	<b>92.62</b>
<i>BAAQMD GHG Threshold</i>	<i>1,100</i>
<i>Significant (Yes or No)?</i>	<i>No</i>

**Source:** Appendix A

**Notes:** Total emissions may not sum due to rounding. CO<sub>2</sub>e = carbon dioxide-equivalent; MT/year = metric tons per year

<sup>a</sup><0.1 = value less than reported 0.1 metric tons per year.

Table 3.8-1 indicates that the GHG emissions associated with the project would be below BAAQMD's GHG threshold of 1,100 MT CO<sub>2</sub>e per year. Therefore, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and this would represent a **less-than-significant** GHG impact.

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

As previously discussed, the SCRCPA adopted a CAP in July 2016, for which EIR was later nullified in court (Superior Court for the County of Sonoma 2017). Regardless, the City of Cloverdale formally adopted the goals outlined the CAP in January 2018 and committed to implementing the local GHG reduction measures for the City outlined in the CAP (City of Cloverdale 2018). The proposed project would comply with the applicable measures outlined in the CAP, including protecting and enhancing open space and reducing local travel demand.

The Scoping Plan, approved by CARB on December 12, 2008, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to specific projects. Relatedly, in the Final Statement of Reasons for the Amendments to the CEQA Guidelines, the California Natural Resources Agency observed that "[t]he [Scoping Plan] may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan (CARB 2014)." Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among

others. To the extent that these regulations are applicable to the project, the project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law.

Regarding consistency with Senate Bill (SB) 32 (goal of reducing GHG emissions to 40% below 1990 levels by 2030) and Executive Order (EO) S-3-05 (goal of reducing GHG emissions to 80% below 1990 levels by 2050), there are no established protocols or thresholds of significance for that future-year analysis. However, CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the *First Update to the Climate Change Scoping Plan* that “California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32” (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the *First Update to the Climate Change Scoping Plan* states the following (CARB 2014):

“This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under Assembly Bill 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions.”

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and EO S-3-05. This is confirmed in *California's 2017 Climate Change Scoping Plan (2017 Scoping Plan)*, which states, “This Plan draws from the experiences in developing and implementing previous plans to present a path to reaching California’s 2030 GHG reduction target. The Plan is a package of economically viable and technologically feasible actions to not just keep California on track to achieve its 2030 target, but stay on track for a low- to zero-carbon economy by involving every part of the state (CARB 2017).” The *2017 Scoping Plan* also states that although “the Scoping Plan charts the path to achieving the 2030 GHG emissions reduction target, we also need momentum to propel us to the 2050 statewide GHG target (80% below 1990 levels). In developing this Scoping Plan, we considered what policies are needed to meet our mid-term and long-term goals (CARB 2017).”

The project would not interfere with implementation of any of the above-described GHG reduction goals for 2030 or 2050 because the project would not exceed the BAAQMD’s GHG threshold of 1,100 MT CO<sub>2</sub>e per year, which was established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. Because the project would not exceed the threshold, this analysis provides support for the conclusion that the project would not impede the state’s trajectory toward the above-described statewide GHG reduction goals for 2030 or 2050.

Since the specific path to compliance for the state in regards to the long-term goals will likely require development of technology or other changes that are not currently known or available, specific additional mitigation measures for the project would be speculative and cannot be identified at this time. With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet SB 32’s 40% reduction target by 2030 and EO S-3-05’s 80% reduction target by 2050; this legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets.

Based on the above considerations, the project would have **no impact** due to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

### Mitigation Measures

No mitigation measures are required.

## 3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Setting

The analysis and mitigation measures in this section are based on the Soil and Soil Vapor Sampling Summary memo prepared by Dudek for the project site, which is provided in Appendix E. Hazardous materials stored and used in the area surrounding the project property would likely be associated with common materials used in utility work, maintenance, vegetation care, residential uses, construction, and recreational activities, such as paints, cleaning solvents, bonding agents, and small quantity petroleum fuels and lubricants. A search of the State Geotracker and Envirostor databases determined that no hazardous materials cleanup sites are located within or adjacent to the project property (RWQCB 2020 and DTSC 2020). The project property is currently within the State Responsibility Area and a Moderate Fire Hazard Severity Zone (Calfire 2021).

## Impact Discussion

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

Construction activities would involve the use of common hazardous materials used in construction, including petroleum-based fuels, hydraulic fluids, and lubricants used in vehicles and equipment. Large quantities of these materials would not be stored at or transported to the construction site. All construction waste materials would be disposed of in compliance with state and federal hazardous waste requirements and at appropriate facilities. Construction would comply with the requirements for storage, spill prevention and response and reporting procedures, and by implementing spill prevention measures included in the SWPPP (see Sections 3.7 and 3.10 and Mitigation Measure GEO-1). Additionally, Mitigation Measure HAZ-1: Spill Prevention requires specific measures for spill prevention and containment of hazardous materials on the project site during construction, such as a requirement to cover stockpiled materials, vehicle specifications for hazardous material transport and disposal, procedures for safe storage, and training requirements for construction workers handling hazardous materials.

During project operation (long-term use and maintenance of the athletic fields and associated site improvements), limited quantities of common hazardous materials such as fuel for lawn mowing equipment, fertilizer for the turf, and cleaning products for the concession stand and restrooms would be used. These materials are commonly used in residential, commercial, and public facility land uses, including at all three of the District's school campuses. District maintenance staff are trained on the proper handling and disposal of such materials.

Thus, use of hazardous materials at the project site during construction and operation would not create a substantial hazard. Impacts associated with transport, use, or disposal of hazardous materials during construction and operation would be **less than significant with mitigation incorporated**.

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

As discussed in response a) above, project construction would involve temporary use of hazardous materials, including fuel for construction equipment, paints, solvents, and sealants. Storage, handling, and use of these materials would occur in accordance with Mitigation Measure HAZ-1: Spill Prevention and standard construction BMPs to minimize the potential for spill or release and ensure that any such spill or

release would be controlled on site. Compliance with standard construction specifications, the Hazardous Substances Plan, and Mitigation Measure HAZ-1 would ensure that impacts would be less than significant.

A Draft Phase I Environmental Site Assessment (ESA) was prepared for the project property in 2018 in support of the District's acquisition of the property (Terraphase Engineering 2018). In addition, soil and soil vapor samples were collected and analyzed in support of preparation of this Initial Study. The results of these analyses are presented in the Soil and Soil Vapor Sampling Summary memorandum provided in Appendix E.

### **Draft Phase I ESA Findings**

The Draft Phase I ESA details stated that the project property has never been developed and has been used for livestock grazing since at least the 1950s but that historical uses on adjacent properties may have introduced hazardous environmental conditions to the site. These include:

- the presence of a former, unlined, wood waste landfill, located approximately 950 feet southwest of the property which could have caused impacts to groundwater and deposition of contaminants within the proposed project property via surface drainage; and
- a teepee burner formerly located on an adjacent parcel that was used operated to burn wood waste by the former Louisiana Pacific Sawmill located on an adjacent parcel and could have aerially deposited contaminants on the project property.

Additionally, the Draft Phase I ESA recommended evaluation of potential naturally occurring asbestos (NOA) at the site.

### **Soil Sampling**

In December 2020, Geocon Consultants Inc. collected soil samples from one foot below ground surface (bgs) in five different locations across the project site. Laboratory analysis of these samples found that dioxin OCDD was the only individual dioxin or furan detected above laboratory reporting limits, but that toxic equivalency of all samples were all below the soil screening levels; therefore, dioxins and furans do not appear to be a concern at the project site.

Arsenic was detected above the screening levels established by the RWQCB, EPA, and DTSC in all five analyzed samples, but the arsenic concentrations in four of the five samples were within the range of typical background concentrations for California (up to 12 mg/kg). With a detected concentration of 18 mg/kg, the arsenic concentration in sample E1-0.5-1 was higher than the typical background concentration.

Cobalt was detected in all five soil samples above the RWQCB and EPA residential soil screening level of 23 mg/kg but below the commercial use soil screening level.

Chromium and nickel were detected in the soils at concentrations that would indicate potential hazardous waste concentrations; however, further evaluation following soluble threshold limit concentration or toxicity characteristic leaching procedures extraction indicated that the metals concentrations are not at hazardous waste levels.

Several other borings were also advanced to 5.75 feet bgs in order to collect soil samples to be analyzed for asbestos. Soils observed were alluvium and terrace deposits. Asbestos was not detected in any of the five samples.

### Soil Vapor Sampling

In February 2021, Geocon Consultants Inc. collected soil vapor samples from six temporary soil vapor probes. The probe depths were approximately 5 feet bgs. The samples were analyzed for volatile organic compounds (VOCs). The analysis found that concentrations of the VOCs 1,2-dichloroethane, benzene, and chloroform exceeded screening levels in three of the samples. However, none of the soil vapor sample concentrations exceeded the DTSC or EPA screening levels when typical indoor air attenuation factors are applied. Further, no buildings are planned for consistent occupation at the site. The project includes a restroom, which will not have long-term occupation, and a concessions stand, which will not be fully enclosed when occupied. Thus, while VOCs are present in the subsurface, that they are not considered to be a concern for the currently proposed CUSD South Fields project. It is noted that the District is conducting planning and feasibility studies for further development of the project property. If buildings other than a restroom and concessions stand are included in future projects at the property, vapor intrusion would be reevaluated for that specific project.

### Conclusions

Although cobalt concentrations were all less than the commercial use soil screening levels, DTSC recommends a health-conservative screening evaluation for potential school sites. Thus, the elevated cobalt concentration could pose a risk to people using the proposed athletic fields. Thus, Mitigation Measure HAZ-2: Cobalt Removal requires targeted removal of soil at sample locations E2, E3, and E4 and additional soil sampling, or alternative mitigation where removal is not feasible.

Arsenic was detected at a concentration above the typical background concentration of 12 mg/kg in one sample location (E1). Mitigation Measure HAZ-3: Arsenic Removal requires that the District complete a targeted removal of soil at the sample location E1 and confirmation soil sampling in the walls of the excavation to confirm removal of the elevated arsenic.

While asbestos was not detected in the soil samples and serpentine rock was not observed in the site borings, if NOA is encountered during grading and asbestos is released into the air, it would result in potentially significant adverse health effects for construction workers and people in the vicinity. Thus, Mitigation Measure HAZ-4: NOA Management requires that construction workers be trained to recognize potential NOA (e.g. serpentine rock) and that the grading and excavation work comply with State and local regulations for asbestos.

In addition, Mitigation Measure HAZ-5: Dust Suppression requires that soils be watered as needed to keep dust to a minimum, in accordance with the Northern Sonoma County Air Pollution Control District Rule 430.

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

The project would not create new hazardous emissions or require handling and use of hazardous materials other than as discussed in responses a) and b) above and would not generate hazardous waste. The

Cloverdale Seventh-Day Adventist School is located approximately one-half mile from the project property thus the project would have **no impact** related to use of hazardous materials within one-quarter mile of an existing or proposed school.

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

The project property is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, therefore, will have **no impact** associated with constructing or operating a project on a hazardous materials site listed under this section.

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

The proposed project is approximately 4,350 feet east of the Cloverdale Municipal Airport. The City of Cloverdale adopted the Airport Master Plan in 2008, and the airport was recently upgraded with improvements made to the runway surface, electrical and paint striping. The airport has one paved and lit runway that serves single- and light twin-engine aircraft. It consists of an asphalt surface that is approximately 3,000 feet long (City of Cloverdale 2008). The runway is oriented in a northwest to southeast direction and the flight path for aircraft landing and taking off from the airport extends in both of these directions, thus aircraft approaching or leaving the airport do not pass over the proposed project property. In addressing safety concerns for lands outside of the airport, the Airport Master Plan recommends “that no land in the very immediate airport vicinity be designated or zoned for incompatible uses such as residences, schools, hospitals, and the like” (City of Cloverdale 2008). As the proposed CUSD South Fields project property is not in the immediate vicinity of the airport, the project would not conflict the Airport Master Plan and there are no substantial airport hazards to which the property is exposed. Additionally, the proposed project property is well-outside the airport’s 65 decibel (dB) noise contour. The anticipated future 60 dB noise contour is generally contained within the airport property but extends into a small area immediately northwest of the airport. Thus, the proposed CUSD South Fields project would not be exposed to excessive airport noise. The project would have **no impact** associated with airport related hazards or noise.

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

Site access would be provided via Kelly Road (on the south side of the project property). In addition, Kelly Road on the north side of the project property would be widened and paved as part of development of the Baumgardner Ranch project; this project would also extend Foothill Boulevard southerly to connect with Kelly Road. Thus, emergency vehicle access would be available to the proposed CUSD South Fields project from both the north and south sides of the property and the project site would be accessible to emergency responders during construction and operation of the project. The proposed project would not add population to the area and would not add a substantial number of vehicles to the area that could cause congestion that interferes with emergency access to the site, emergency response activities throughout the project area, or emergency evacuation. Therefore, the project would have **no impact** associated with impairment or interference with emergency response or evacuation.



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

The proposed project property is within Sonoma County included in the State Responsibility Area for fire protection. The property is designated as being in a Moderate Fire Hazard Severity Zone (Calfire 2021). The project property is anticipated to be annexed to the City of Cloverdale as part of a separate development project anticipated to be proposed for the adjacent property to the south. After annexation, the property would be in a Local Responsibility Area and the Cloverdale Fire Protection District would have the primary responsibility for fire protection.

The area west of the project property is characterized by a northwest to southeast trending ridgeline with rolling to steeply sloped topography and dense tree cover. However, the property immediately west of the project property has been cleared of vegetation and supports a community land-based solar panel installation. This reduces the fuel load in the immediate vicinity of the project property.

The proposed CUSD South Fields project would introduce human activity to the project property, which could increase the risk of wildfire ignition. While the risk would be minimal because the athletic fields would be irrigated and maintained, human activity that could increase risk would also occur within the dog park and outside of the fields. To prevent this increase in risk of fire ignition, Mitigation Measure HAZ-6: Wildfire Fuel Management requires vegetation management within and adjacent to the active use areas within the project site.

Additionally, by introducing human activity to the project site, the proposed project could expose people within the site to wildfire risks if a wildfire were to be ignited west of the project site and travel easterly towards the site. However, as discussed in response f) above, there would be sufficient roadway access to the project site to allow for emergency evacuation if necessary. Further, with the vegetation management required under Mitigation Measure HAZ-6, the risk of a wildfire spreading into the athletic fields would be reduced. Thus, the project's impacts associated with exposing people or structures to significant wildfire hazards would be **less than significant with mitigation incorporated**.

**Mitigation Measure:**

Refer to Section 3.7, Geology and Soils, for Mitigation Measure GEO-1: Stormwater Pollution Prevention Plan.

**HAZ-1      Spill Prevention.** The following measures shall be implemented prior to and during construction and shall be incorporated into project plans and specifications.

- All equipment shall be inspected by the contractor for leaks prior to the start of construction and regularly throughout project construction. Leaks from any equipment shall be contained and the leak remedied before the equipment is again used on the site.
- Best management practices for spill prevention shall be incorporated into project plans and specifications and shall contain measures for secondary containment and safe handling procedures.
- A spill kit shall be maintained on site throughout all construction activities and shall contain appropriate items to absorb, contain, neutralize, or remove hazardous materials stored or used in large quantities during construction.

- Project plans and specifications shall identify construction staging areas and designated areas where equipment refueling, lubrication, and maintenance may occur. Areas designated for refueling, lubrication, and maintenance of equipment shall be approved by the City.
- In the event of any spill or release of any chemical or wastewater during construction, the contractor shall immediately notify the City.
- Hazardous substances shall be handled in accordance with Title 22 of the California Code of Regulations, which prescribes measures to appropriately manage hazardous substances, including requirements for storage, spill prevention and response and reporting procedures

**HAZ-2**

**Cobalt Removal.** Prior to commencement of rough grading, the District's construction contractor shall complete targeted removal of soil at sample locations E2, E3, and E4 and confirmation soil sampling to confirm removal of the elevated cobalt (>46.9 mg/kg). If serpentine rock is discovered during targeted removal or further sampling and the elevated cobalt is determined to be due to the presence of serpentine rock, then alternative mitigation shall occur following rough grading if targeted removal is determined to not be practical. The alternative mitigation would include the following remedies noted by DTSC for sites with naturally occurring asbestos (NOA) where removal is not practical.

- Cover the site areas with elevated cobalt with imported clean fill materials or cover/cap specified areas with buildings, hardscape, sod, or landscaping sufficient to create a barrier and prevent future exposure pathways;
- Develop an Operations and Maintenance Plan to ensure that the remedy remains protective in perpetuity; and
- Record a land use covenant and/or school board resolution to restrict future activities that would create exposure to impacted soils.

**HAZ-3**

**Arsenic Removal.** Prior to commencement of rough grading, the District's construction contractor shall complete targeted removal of soil at the sample location E1 and conduct additional soil sampling and analysis for arsenic concentrations. The soil samples shall be taken from the walls of the excavation area for the targeted removal to confirm that the arsenic concentrations of the remaining soil are at or below the typical background concentration of up to 12 mg/kg. If samples have concentrations above the background concentration, additional soil removal shall be completed and soil sampling conducted until all samples have a maximum arsenic concentration of 12 mg/kg.

**HAZ-4**

**NOA Management.** The District shall ensure that construction contracts require that construction workers be trained to recognize potential NOA (e.g. serpentine rock) and that if grading activities uncover potential NOA, the grading and excavation work shall comply with State and local regulations for asbestos, including the California Air Resources Board Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations. This includes a requirement to notify the Northern Sonoma Air Pollution Control District within the next business day of the identification of NOA, serpentine, or ultramafic rock within the area to be graded and submittal and implementation of an asbestos dust mitigation plan within 14 days of the discovery of NOA, serpentine, or ultramafic rock. The mitigation plan shall include the following remedies where removal is not practical.

- Cover the site areas with NOA with imported clean fill materials or cover/cap specified areas with buildings, hardscape, sod, or landscaping sufficient to create a barrier and prevent future exposure pathways;
- Develop an Operations and Maintenance Plan to ensure that the remedy remains protective in perpetuity; and
- Record a land use covenant and/or school board resolution to restrict future activities that would create exposure to impacted soils.

**HAZ-5 Dust Suppression.** The District shall ensure that construction contracts require that soils within and adjacent to areas where grading, trenching, vegetation removal, and construction traffic will occur must be watered at least twice per day sufficient to minimize dust emissions, consistent with Northern Sonoma County Air Pollution Control District Rule 430.

**HAZ-6 Wildfire Fuel Management.** The District shall implement the following vegetation management measures to minimize wildfire fuel within and adjacent to the project site:

- Vegetation shall be removed and/or pruned within 15 feet of the perimeter of the dog park, except where the vegetation is within the riparian woodland associated with the drainage located south of the dog park.
- Vegetation within 30 feet of each athletic field and the parking lot, concession stand, and restroom area shall be mowed at least monthly between November and April and at least twice per month between May and October except where the vegetation is within the riparian woodland associated with the adjacent drainages. As an alternative to mowing, goat grazing may be used to remove vegetation. In this case, fencing shall be placed 10 feet from the edge of riparian woodland vegetation to exclude goats from those areas.

## 3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY – Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	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 would:				
i) result in substantial erosion or siltation on or off site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Setting

The project involves the construction of athletic fields, a dog park, a parking lot, a concession stand, and restrooms. The proposed project would be subject to a SWPPP as the project is larger than one acre. The project property is crossed by two intermittent drainages, as shown on Figure 6, which are tributary to Icaria Creek to the south and ultimately to the Russian River to the east. The Flood Insurance Rate Maps issued by the Federal Emergency Management Agency (FEMA) indicate that the project property is located within flood Zone X. Zone X is considered an area of minimal flood hazard (FEMA 2008).

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

The proposed project would construct athletic fields and associated improvements on a portion of a vacant property at the south end of the City of Cloverdale. The project would introduce approximately 9 acres of impervious surfaces to the project site and introduce potential water contaminants during construction and project operation. These potential contaminants could enter the onsite drainage channels and be conveyed to Icaria Creek and the Russian River, which could increase sedimentation and degrade downstream water quality. This would represent a potentially significant impact related to surface and groundwater quality during both construction and project operation.

During construction, water quality can be impaired if runoff contains eroded soils and fuel, oil, and particles from breaks and tires of construction equipment. During operation, water quality can be impaired if runoff contains pollutants such as fertilizer used on the athletic fields, fuel, oil, and dust from automobiles using the proposed parking lot, and dog waste that may accumulate at the dog park.

### **Construction**

As discussed in Section 3.7, Geology and Soils, under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (NPDES No. CAS000002, Order No. 99-08-DWQ) process, the project would be required to obtain a permit before the start of construction activity. Obtaining a permit requires preparation and implementation of a SWPPP during construction in accordance with federal and State requirements. Preparation and implementation of a SWPPP is required under Mitigation Measure GEO-1. The SWPPP would identify structural and non-structural BMPs intended to prevent erosion during construction. Although construction activities have the potential to generate increased sedimentation and introduce pollutants to the project site and downstream waters, implementation of a SWPPP in compliance with applicable policies and regulations would minimize the potential to degrade water quality in downstream water bodies to the maximum extent possible. As a result, construction-related project impacts related to surface and groundwater water quality would be **less than significant with mitigation incorporated**.

### **Operation**

The proposed fields would be placed over portions of the two intermittent drainages within the site, requiring that those portions of the drainages be piped. Stormwater runoff would be treated by being routed through sand/oil separators within the drain inlets before entering the intermittent drainage south of the fields through an outfall. Riprap is proposed to be installed within the drainage at the point of discharge to minimize erosion.

The project would create new impervious surfaces consisting of the two joint-purpose athletic fields as well as the parking lot and building that houses the concession stand and restrooms. Construction of the proposed dog park would involve fencing the dog park perimeter; it would not require any grading or paving and thus would not create any new impervious surfaces. The new impervious surfaces would reduce stormwater percolation into the ground and thus increase the peak rate and volume of stormwater runoff. This could increase the potential for runoff to cause soil erosion. However the site grading would result in slopes within and around the fields such that runoff would be directed to the drain inlets in the stormwater pipes and then routed through the storm drain outfall and riprap before entering the onsite intermittent drainage channel.

As required under Mitigation Measure GEO-1, the SWPPP would identify specific BMPs, such as filters within the drain inlets, bioswales, and planters, that would be installed throughout the project site to reduce peak runoff flow and remove pollutants from stormwater flow. In addition, Mitigation Measure HYD-1: Dog Park Waste Management requires installation of signage, waste bags, and trash receptacles at the dog park requiring that dog park users place all dog waste in the trash receptacles, and requires the District to routinely inspect the dog park, place any dog waste in the trash receptacles, and empty the trash receptacles. Thus, project operation impacts related to surface and groundwater quality would be **less than significant with mitigation incorporated**.

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

The City of Cloverdale is within the Alexander Valley Groundwater Basin, which is ranked as a Low Priority basin under the Sustainable Groundwater Management Act (SGMA). The Low Priority ranking indicates that the basin is not in a condition of substantial overdraft.

The City of Cloverdale water supply comes from seven wells that draw water from the Russian River. The City does not directly pump groundwater from the Alexander Valley Groundwater Basin or use groundwater as part of the water supply, but, as stated in the City's 2020 Urban Water Management Plan (UWMP), the City's wells are "classified by the California Division of Drinking Water as 'utilizing groundwater under the direct influence of surface water' from the Russian River."

The UWMP discusses that the City has senior water rights to water within the Russian River, dating from before 1914. This provides the City with rights to sufficient water supply to meet the City's existing and projected demands. However, in recognition of the importance of regional water conservation, the City's UWMP documents the City's intent to "reduce its supply during dry year conditions to support regional supply reliability efforts. In order to eliminate the supply shortfall, the City will implement the necessary stages of its Water Shortage Contingency Plan." Based on this, the UWMP shows that an approximately 10% reduction in water consumption would be needed in dry years (City of Cloverdale 2021).

The City's UWMP documents the existing (year 2020) water supply and demand as well as water supply and demand projections in five-year increments through 2040. In general, the largest component of water demand is the City's residential population, with commercial (which includes institutional uses, such as schools and parks) and agricultural irrigation comprising the next largest components, and minor other demand factors (industrial demand, water system losses) also reflected in the total demand.

In compliance with state regulations that require increasing levels of water conservation, the City set a 2020 water use per capita target of 139 gallons per day (gpd), which is 20% below the per capita consumption in 2015. The City's actual 2020 per capita water use was calculated as 117 gpd, well below its 2020 target. The City expects that this per capita water use rate will remain constant due to increasing requirements for water and sewer system efficiency, but that total water consumption will increase City-wide demand is expected to increase proportionally to projected population growth, reaching a demand of approximately 580 million gallons per year by 2040 for a projected population of around 13,600.

The City's total year 2020 water demand budget included 271 gpd for residential land uses, 55 gpd for commercial uses, which includes schools and other institutional uses, 30 gpd for agricultural irrigation, and 37 gpd for other minor demand categories and water system losses. The water demand projections reflected in the UWMP are based on anticipated population growth within the City as well as associated growth in other land use categories to maintain "a balance of land uses within the City boundary with the infrastructure and resources in place to be able to sustain 12,000 residents and 4,700 housing units" including that additional "recreation assets will be provided to match population growth." The water demands by land use category are projected to increase by 2040 to 371 gpd for residential uses, 84 gpd for commercial and institutional uses, 44 gpd for agricultural irrigation, and 83 gpd for other minor demand categories and water system losses. The water demand represented by the CUSD South Fields project would be included in the commercial and institutional uses category, and would be consistent with the

water demand projections of the UWMP because the project reflects a recreation facility necessary to support educational programs that serve the existing and planned residential population.

The project would increase the amount of impervious surfaces within the project site, but runoff from these surfaces would discharge to the intermittent drainage that flows north to south in the eastern portion of the project site and is tributary to Icaria Creek to the south. Thus, the project would not substantially alter the drainage pattern of the project property, and runoff from the site would continue to flow to Icaria Creek and ultimately to the Russian River. The project would not reduce the amount of groundwater recharge that occurs through percolation of water within Icaria Creek and the Russian River.

The project would have **no impact** associated with decreasing groundwater supplies or interfering with groundwater recharge.

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

- i) ***result in substantial erosion or siltation on or off site;***
- ii) ***substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;***
- iii) ***create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or***
- iv) ***impede or redirect flood flows?***

The proposed project would result in minor temporary changes in site hydrology resulting from construction disturbance such as grading, trenching, equipment use, and vegetation removal. As discussed in Section 3.7: Geology and Soils, construction may result in erosion of topsoil and increased sedimentation. Implementation of Mitigation Measure GEO-1 (Stormwater Pollution Prevention Plan) would ensure that erosion is minimized during construction. The proposed project would result in no substantial change in the pattern of drainage through the project site and would result in no change in on or off-site flooding or create or contribute runoff that would exceed the capacity of stormwater drainage systems; the proposed project includes the construction of sports fields, dog park, parking lot, and restrooms.

The proposed project would result in no impact associated with a substantial alteration of the course of a stream or river or through the addition of impervious surfaces that would result in substantial erosion or siltation, a substantial increase in runoff leading to flooding, exceedance of capacity in an existing stormwater system, or substantial additional sources of polluted runoff. The proposed project would result in a less-than-significant impact associated with changes in on-site hydrology that would result in erosion or siltation, flooding, exceedance of capacity in an existing stormwater system, or water quality degradation. The project does not propose structures that would contribute to stormwater runoff or impede or redirect flood flows. This would be a less-than-significant impact on runoff, stormwater systems, and flood flows. As discussed in Section 3.9: Hazards and Hazardous Materials, construction of the project would involve temporary use of common hazardous materials used for construction purposes. However, implementation of Mitigation Measure GEO-1 and appropriate materials handling and spill prevention measures required

by Mitigation Measure HAZ-1 would ensure that water quality would not be degraded by materials used during construction or inadvertent release of those materials. Impacts would be **less than significant with mitigation incorporated**.

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

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

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

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

**Mitigation Measures**

Refer to Section 3.7, Geology and Soils, for Mitigation Measure GEO-1: Stormwater Pollution Prevention Plan and Section 3.9, Hazards and Hazardous Materials, for Mitigation Measure HAZ-1: Spill Prevention.

**HYD-1 Dog Park Waste Management** The District shall install signage, dog waste bag dispensers, and trash receptacles at the dog park. The signage shall notify all users of the dog park that they must pick up all dog waste and place it in the trash receptacles. The District shall inspect the dog park at least once per week for dog waste that has not been removed and shall collect the dog waste and place it in the trash receptacles. Dog waste bag dispensers shall be inspected and restocked weekly, and trash receptacles shall be emptied weekly.

## 3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING – Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



## Setting

The project property is located within Sonoma County, just south of the City limits of Cloverdale, California. The Sonoma County General Plan land use designation for the site is Rural Residential (Sonoma County 2013). The City of Cloverdale General Plan designations for the site are Low Density Residential and Conservation in the western portion of the site and General Industry in the eastern portion of the site (City of Cloverdale 2019). The Sonoma County zoning designations for the site includes Agricultural and Residential (AR-B8) along with the Scenic Resources Combining District/Valley Oak Habitat Combining District (SR-VOH) on the western portion of the site; Rural Residential (RR-B8, RRD-B6-40) on the eastern portion of the site; and Limited Urban Industrial (M1-B8) for the flagpole portion of the lot that extends to Dutcher Creek Road (Sonoma County 2021a). Because the property is outside of the City limits, there are no City of Cloverdale zoning designations for the site.

The property to the north is currently generally undeveloped with the exception of a historic barn but has been approved for development of a residential community with between 296 and 304 dwelling units. The property to the south is also generally undeveloped with the exception of a rural residence and accessory structures. That property is designed Rural Residential by Sonoma County. Thus, there is no established community adjacent to the project property.

## Impact Discussion

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

The project proposes to construct athletic fields, a dog park, parking area, concession stand, and restrooms. All construction would occur on land owned by the District. There is no established community adjacent to the project property and the proposed project would have **no impact**.

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

The proposed project would affect approximately 9 acres of the project property by constructing athletic fields, a dog park, a small parking lot, a concession stand, restrooms, and associated infrastructure. The policies and ordinances of the City of Cloverdale and of Sonoma County are not binding on the District. Thus, no local land use plans, policies, or regulations would apply to the proposed project. Therefore, the project would have **no impact**.

Additionally, as documented throughout this Initial Study, all of the potentially adverse environmental impacts of the proposed project would be reduced to less than significant levels with implementation of the mitigation measures included in this Initial Study. Thus the project would not result in any significant and unavoidable environmental effects.

## Mitigation Measures

No mitigation measures are required.

## 3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES – Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Setting

No mineral resources are known from the site and no mineral extraction operations exist in the vicinity of the project, the City limits of Cloverdale or in the surrounding area in the County of Sonoma (City of Cloverdale 2010, Sonoma County 2016). The Sonoma County General Plan Open Space and Resource Conservation Element identifies that mineral resource activities in the County “consist almost exclusively of the extraction and processing of rock, sand and earth products for use in construction and landscaping” and that these activities primarily occur in the Russian River Valley.

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

There are no known mineral resources within the project property, and it is unlikely that undiscovered mineral resources are present. Therefore, there would be **no impact**.

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

The General Plans of the City of Cloverdale and Sonoma County do not identify any important mineral resources within the project property or the surrounding area. No mineral recovery activities have been known to occur on site. A portion of the site is designated by the City of Cloverdale General Plan as Conservation, but this designation was applied to the oak woodland area onsite and is not intended to identify any mineral resources. The Sonoma County General Plan designates the site for Rural Residential land uses (City of Cloverdale 2010, Sonoma County 2016). Thus, the proposed project would have **no impact**.

### Mitigation Measures

No mitigation measures are required.

### 3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIII. NOISE – Would the project result in:</b>				
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Setting

The analysis and mitigation measures in this section are based on the noise modeling conducted by Dudek for the proposed project. The noise modeling data sheets are provided in Appendix F. Noise-sensitive land uses include residences, hotels and motels, schools and universities, hospitals, and churches. The nearest existing noise-sensitive land uses to the project property is a single-family residence located approximately 370 feet northwest of the property boundary. Residences expected to be constructed as part of the Baumgardner Ranch project north of the project property would represent the nearest noise-sensitive uses to the project site once that adjacent project is constructed.

#### Fundamentals of Environmental Noise

A brief background on the fundamentals of environmental acoustics is helpful in understanding how humans perceive various sound levels. Although extremely loud noises can cause temporary or permanent damage, the primary environmental impact of noise is annoyance. The objectionable characteristic of noise often refers to its loudness. Loudness represents the intensity of the sound wave, or the amplitude of the sound wave height measured in decibels (dB). Decibels are calculated on a logarithmic scale; thus, a 10 dB increase represents a 10-fold increase in acoustic energy or intensity, and a 20 dB increase represents a 100-fold increase in intensity. Decibels are the preferred measurement of environmental sound because of the direct relationship between a sound's intensity and the subjective "noisiness" of it. The A-weighted decibel (dBA) system is a convenient sound measurement technique that weighs selected frequencies based on how well humans can perceive them.

The range of human hearing spans from the threshold of hearing (approximately 0 dBA) to that level of noise that is beyond the threshold of pain (approximately 120 dBA). In general, human sound perception is such that a change in sound level of 3 dB in a normal setting (i.e., outdoors or in a structure, but not in an acoustics laboratory without

background noise levels) is just noticeable, and a change of 5 dB is clearly noticeable. A change of 10 dB is perceived as a doubling (or halving) of sound level. Noise levels are generally considered low when they are below 45 dBA, moderate in the 45 to 60 dBA range, and high above 60 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss if exposure is sustained.

Ambient environmental noise levels can be characterized by several different descriptors. Energy equivalent or energy average level ( $L_{eq}$ ) describes the average or mean noise level over a specified period of time.  $L_{eq}$  provides a useful measure of the impact of fluctuating noise levels on sensitive receptors over a period of time. Other descriptors of noise incorporate a weighting system that accounts for a person's susceptibility to noise irritations at night. Day-night average sound level ( $L_{dn}$ ) is a 24-hour average A-weighted sound level with a 10 dB penalty added to the nighttime hours from 10:00 p.m. to 7:00 a.m. The 10 dB penalty is applied to account for increased noise sensitivity during the nighttime hours.

#### *Existing Noise Conditions*

Noise measurements were taken on and near the project property in December 2020 to characterize the existing noise environment. The daytime, short-term (1 hour or less) attended sound level measurements were taken with a model 831 Larson Davis sound-level meter. This sound-level meter meets the current American National Standards Institute standard for a Type 1 general purpose sound-level meter. The calibration of the sound-level meter was verified before and after the measurements were taken, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Four noise measurements were taken at 3 three locations (ST1, ST2, and ST3), which were identified as locations within or adjacent to the project property with exposure to the roadways immediately adjacent to or leading to the property, as described in Table 3.13-1.

**Table 3.13-1 Measured Noise Levels**

Receptor	Location/ Address	Date	Time	$L_{eq}$ (dBA) <sup>1</sup>
ST1	Northeast Corner of the project site	December 22, 2020	3:35 pm to 3:50 pm	54.6
		December 22, 2020	4:35 pm to 4:45 pm	55.9
ST2	Center of northern property boundary	December 22, 2020	4:02 pm to 4:12 pm	48.7
ST3	Center of northeastern property boundary	December 22, 2020	4:15 pm to 4:25 pm	49.0

<sup>1</sup> Equivalent continuous sound level (time-average sound level) in A-weighted decibels.

**Source:** Appendix F

The sound levels reported in Table 3.13-1 represent the average noise level throughout the measurement period at each of the four locations. Noise measurement data is also included in Appendix F. The primary noise sources at the measurement locations consisted of traffic along the adjacent roads. Existing traffic noise resulting from freeway traffic on Redwood Highway at the nearest sensitive receptor was calculated in a spreadsheet model based on the FHWA algorithms with the distance between the receptor and the freeway, average daily trips, vehicle speed

and the distribution of different vehicle types used as inputs. Traffic noise levels were calculated to be 54.8 L<sub>dn</sub> (dBA) at the nearest existing noise sensitive receptor.

### *Regulatory Background*

Generally, federal and state agencies regulate mobile noise sources by establishing and enforcing noise standards on vehicle manufacturers. Local agencies generally regulate stationary noise sources and construction activities to protect neighboring land uses and the public's health and welfare.

The project property is located within Sonoma County and within the City of Cloverdale's Sphere of Influence and Urban Growth Boundary. As noted above, the noise-sensitive uses nearest to the project property are residences within the City of Cloverdale. To evaluate the proposed project's potential effects on residents within the City of Cloverdale, this analysis relies upon the established noise policies and criteria in the Noise Element of the City's General Plan (City of Cloverdale 2010). Specifically, the City of Cloverdale establishes Land Use and Noise Compatibility Standards in Exhibit 4.1 of the Noise Element. As noted above, the noise-sensitive receptors nearest to the project property are the existing residences approximately 370 feet north of the site and the planned residences immediately north of the site. According to the City's Land Use and Noise Compatibility Standards, noise environments for residential receptors with noise levels up to 60 dBA CNEL are considered to be normally acceptable, while noise environments from 60 dBA to 70 dBA CNEL are considered to be conditionally acceptable. Additionally, interior noise levels for new single-family and multifamily residential projects must be maintained below 45 dBA CNEL. Policy NE 1-3 of the Noise Element establishes that noise from stationary sources such as music, machinery and pumps, air conditioners, should be contained on the noise-generating site and should not exceed the exterior noise level standards noted above for receiving land uses.

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

### ***Construction Noise***

The proposed project would be constructed in phases; the primary phases would consist of grading and trenching, installation of athletic fields and landscaping, paving of the parking area, construction of the concession stand and restroom building, and application of architectural coatings. Construction activities could increase noise levels temporarily in the vicinity of the project. Actual noise levels would depend on the type of construction equipment involved, distance to the source of the noise, time of day, and other associated factors. For construction noise, a concept called the "acoustic center" is useful in describing average noise levels across the entire construction period for adjacent receivers. The acoustic center is the idealized point from which the energy sum of all construction activity noise near and far would originate, and it is derived by taking the square root of the product of the shortest distance multiplied by the farthest distance. For this project construction, the acoustic center is calculated to be 1,000 feet from the closest receiver. The nearest sensitive receptor to the project property is a single-family home located on the adjacent property to the northwest; the residence is within approximately 370 feet of the project property boundary. Based on currently anticipated timing for development of the proposed project as well as timing for construction of the Baumgardner Ranch project immediately north, it is not expected that the dwelling units within Baumgardner Ranch would be occupied during development of the proposed CUSD South Fields project.

Construction noise is complex to quantify because of the many variables involved, including the specific equipment types, size of equipment used, percentage of time, condition of each piece of equipment, and number of pieces of equipment that will actually operate on site. A noise analysis was performed using the Federal Highway Administration's Roadway Construction Noise Model (RCNM) (FHWA 2008). Input variables for RCNM consist of the receiver/land use types, the equipment type (e.g., backhoe, grader, scraper), the number of equipment pieces, the duty cycle for each piece of equipment (i.e., percentage of time the equipment typically works in a given time period), and the distance from the noise-sensitive receiver to the construction zone. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this analysis. The range of maximum noise levels for various types of construction equipment at a distance of 1,000 (acoustic center) feet is depicted in Table 3.13-2.

**Table 3.13-2. Construction Equipment Noise Emission Levels**

Construction Phase	Typical Sound Level (dBA) 1,000 Feet from Source $L_{eq}$	Typical Sound Level (dBA) 1,000 Feet from Source $L_{DN}$
Site Preparation	61.1	59.1
Grading	61.4	59.4
Building Construction	60.5	58.5
Paving	58.4	56.4
Architectural Coating	47.7	45.7

Source: Appendix F

Based on the calculated results in the RCNM model using the applied noise sensitive receptor distance from the project boundary and acoustical center distance ( 1,000 feet), the calculated dBA  $L_{eq}$  values would range from approximately 51 to 59 dBA  $L_{eq}$  or 45 to 59 dBA  $L_{dn}$  for a given phase of construction. The City's Noise Element states that 60  $L_{dn}$  dBA is the limit of acceptable noise for sensitive land uses such as residences. As shown in Table 3.13-2, construction of the project would not exceed the 60 dBA criteria after converting  $L_{eq}$  to  $L_{dn}$ . Additionally, construction of the project would not increase ambient noise by more than 5 dB compared to the existing conditions. As such, project generated construction noise is not expected to adversely affect the nearest noise-sensitive receptors. However, Mitigation Measure NOI-1: Construction Noise Reduction Measures is required to ensure that construction noise is reduced to the extent feasible. Thus, project impacts during construction would be **less than significant with mitigation incorporated**.

### Operational Noise

The project would include developing a portion of the existing vacant property into athletic fields and a dog park, with ancillary amenities including a parking lot, restrooms, and concession stand. Noise sources at the project site would include players and coaches talking, referee whistles and spectators supporting players. The project does not include any amplified sound systems. The primary noise-related effect that is anticipated with this project is a potential for on-site and off-site increases in traffic.

As discussed in Section 3.17, Transportation, the anticipated increase in traffic around the project would include 62 daily trips which represent a minimal increase. For a project to result in a 3 dB increase in traffic noise levels a project would have to result in twice the amount of roadway trips on nearby roadways. Given the limited number of traffic trips associated with this project and the number of trips associated with the

adjacent Baumgardner Ranch development (2,092 daily trips), the traffic noise associated with the proposed project would be negligible. Therefore, noise resulting from project generated traffic is not anticipated to exceed the 5 dB noise criteria outlined in policy NE 1-5.c of the City's Noise Element.

Noise from the athletic fields would be generated during practices and games. The center of the athletic fields would be located approximately 280 feet away from outdoor activity areas for residences within the planned Baumgardner Ranch project. Given the short-term, sporadic nature of sounds generated by the use of the athletic fields, the lack of amplified sound, and the 24 hour day/night average noise level threshold, the noise levels generated by the use of the athletic fields would not have the propensity to combine and result in elevated day/night noise levels in the ambient environment.

The project would not be anticipated to increase the ambient noise levels in the area in excess of the established noise thresholds anticipated for lands designated by the General Plan for playground and neighborhood park uses. Hours of operation for the proposed project would be during daytime hours, which are less sensitive noise hours; nighttime use of the facilities is not anticipated and no lighting of the fields is proposed. Therefore, the proposed project would not be anticipated to exceed the established General Plan noise thresholds during operations and impacts would be **less than significant**.

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

The project may generate intermittent ground borne vibration during project construction. These potential impacts would be limited to project construction. Ground-borne and vibration levels attenuate very rapidly over short distances. Based on the location of existing sensitives uses, ground borne noise and vibration levels would be indistinguishable in the ambient environment Furthermore adherence to the time limitations of construction activities described in Mitigation Measure NOI-1 would limit the ground-borne vibration disturbances in the project area. Thus, impacts associated with groundborne vibration and noise would be **less than significant with mitigation incorporated**.

**c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

The closest airport is the Cloverdale Airport, which is located less than a mile to the east of the project property. Per the City's Noise Element exhibit 4.4, and the Airport Master Plan the project property is located outside of the 55 dBA CNEL airport noise contours (City of Cloverdale 2008, City of Cloverdale 2010). Thus, the project would not expose people within the project site to excessive noise from airports or airstrips. Impacts would be **less than significant**.

**Mitigation Measures**

**NOI-1 Construction Noise Reduction Measures.** Construction activity for site preparation and for future development shall be limited to the hours between 7:00 a.m. and 4:00 p.m., Monday through Friday. No construction shall occur on State holidays (e.g., Thanksgiving, Labor Day). Construction equipment maintenance shall be limited to the same hours.

## 3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING – Would the project:</b>				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Setting

The proposed project property is located in Sonoma County, adjacent to the city limits of Cloverdale and within the City's Sphere of Influence and Urban Growth Boundary. The project property is anticipated to be annexed to the City as part of a separate development project anticipated to be proposed for the adjacent property to the south; the parcel immediately north of the project property has recently been annexed to the City as part of the Baumgardner Ranch project and is planned to be developed with approximately 300 dwelling units.

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

The proposed project does not propose the construction of housing or new employment opportunities and would not result in any population growth either directly or indirectly. Therefore, the proposed project would have **no impact**.

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

The proposed project does not involve demolition of any residential structure and would not displace populations or housing through the proposed project's operation. Therefore, the proposed project would have **no impact**.

### Mitigation Measures

No mitigation measures are required.



## 3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XV. PUBLIC SERVICES</b>				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Setting

**Fire Protection:** The proposed project property is within Sonoma County included in the State Responsibility Area for fire protection. The property is designated as being in a Moderate Fire Hazard Severity Zone (Calfire 2021). The project property is proposed to be annexed to the City of Cloverdale as part of a separate development project anticipated to be proposed for the adjacent property to the south. After annexation, the property would be in a Local Responsibility Area and the Cloverdale Fire Protection District would have the primary responsibility for fire protection. The closest fire station is located at 451 S Cloverdale Blvd, Cloverdale, CA 95425, about 1.5 miles north of the project property.

**Police Protection:** Police protection services are provided to the project site by the Cloverdale Police Department (CPD) substation located at 112 Broad Street, approximately 2 miles from the project property. The Cloverdale Police Department is split into four divisions and serves as the call center for the city 24 hours per day, 7 days per week.

**Parks:** Furber Park, a 6-acre community park, is located approximately 1-mile north of the project property.

**Libraries:** The Cloverdale Regional Library, operated by the City of Cloverdale, is located at 401 N Cloverdale Blvd, Cloverdale, CA 95425, approximately 2.2 miles from the project property.

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

*Fire protection?*

*Police protection?*

*Schools?*

*Parks?*

*Other public facilities?*

All improvements and construction would be confined to areas within the site boundaries of project site. The athletic facilities would support the existing needs of existing District athletic programs and would also be available to serve the needs of the surrounding community outside of school program hours. The project would not result in additional population in the area and thus would require no new or expanded facilities to support adequate fire or police protection, schools, parks or other public facilities. Therefore, the project would result in **no impact** from physical impacts associated with providing new or modified facilities.

#### Mitigation Measures

No mitigation measures are required.

## 3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVI. RECREATION</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Setting

The project proposes to develop athletic fields, a dog park, a small parking lot, and a concession stand and restrooms. The project would support the existing District athletic programs and allow use of the fields and dog park by community members outside of the times the facility is in use by school programs. The nearest existing recreational facility is Furber City Park, located approximately 3,500 feet north of the project property.

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

The project proposes to construct athletic facilities to support existing District athletic programs. No neighborhood or regional parks exist on or adjacent to the project property, although there is a potential for a 1.3-acre park to be developed within the Baumgardner Ranch project located immediately north of the project property. No other recreational facilities are located within or on the project property. The proposed project would not result in an increased population in the City or County and therefore would not generate increased use of existing or planned recreational facilities. Therefore, the proposed project would have **no impact** associated with deterioration of existing parks and recreational facilities.

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

As stated above, the project proposes to construct athletic facilities to support existing District athletic programs. It would not result in an increased population that would increase demand for recreational facilities and therefore would not require new construction or expansion of existing recreational facilities. As documented throughout this Initial Study, the proposed project could result in potentially significant impacts to biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and noise. Mitigation measures to reduce these impacts to less than significant levels are identified in this Initial Study. Thus, the project would have **less than significant impacts with mitigation incorporated**.

## Mitigation Measures

No mitigation measures specific to recreation impacts are required. Refer mitigation measures identified in Section 3.4 Biological Resources, Section 3.5 Cultural Resources, Section 3.7 Geology and Soils, Section 3.9 Hazards and Hazardous Materials, Section 3.10 Hydrology and Water Quality, and Section 3.13 Noise.

## 3.17 Transportation

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

### Setting

Access to the project site is achieved via Kelly Road from South Cloverdale Boulevard/Dutcher Creek Road. The local roadways that would be utilized during implementation of project activities are Santana Drive and South Cloverdale Boulevard, which are publicly accessible City of Cloverdale roadways. The City of Cloverdale is accessed via SR 101/SR 128 to the west.

The Baumgardner Ranch project immediately north of the project property would widen and pave the northerly Kelly Road and provide a sidewalk between the intersection with Foothill Boulevard and South Redwood Highway. A separate development project on the property south of the project property is anticipated to widen and pave the southerly Kelly Road, which would provide access to the parking lot proposed as part of the CUSD South Fields project.

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

As discussed below, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

As required by Senate Bill (SB) 743, this analysis addresses the project's potential to increase vehicle miles traveled (VMT) in the project area. The project would generate limited amounts of traffic that would use roads within the City of Cloverdale. Thus, the following are the programs, plans, ordinances, or policies that are pertinent to the project (City of Cloverdale 2015).

## City of Cloverdale General Plan Circulation Element

**Goal CE 3** *Promote bicycle use and walking as an alternative to automobile traffic and for community health and provide safe alternatives to automobile use.*

**Policy CE 3-1** *Provide an extensive network of pedestrian and bicycle pathways to support community health and provide safe alternatives to automobile use.*

**Policy CE 3-2** *Provide continuous sidewalks or pedestrian ways along all streets. Maintain sidewalks in good repair. Integrate sidewalks and the pedestrian trails network in the Recreation and Open Space Element.*

**Goal CE 4** *Promote transit service and use to serve Cloverdale land use goals.*

**Policy CE 4-3.a.** *Maintain and encourage use of the Cloverdale City bus by maintaining schedules that serve the community and by use of distinctive vehicles to bring visibility to the service.*

### Transit Facilities

Sonoma County Transit (SCT) provides local and regional bus service within the City of Cloverdale. SCT Route 60 provides regional daily service between Cloverdale and Santa Rosa, serving the communities of Geyserville, Healdsburg, Windsor, Lakefield, and Fulton. The nearest Route 60 bus stop is located along Redwood Highway, less than ¼-mile from the project site, with peak headways averaging between 1.5 and 2 hours. Additionally, SCT Route 68 provides local Monday through Saturday service within the City of Cloverdale, between Furber Ranch Shopping Center and Cloverdale High School. The nearest Route 68 bus stop is located along Treadway Drive, approximately ½-mile from the project site, with peak headways averaging 30 to 50 minutes. The project would not construct roadway facilities that would temporarily or permanently disrupt operation of SCT routes 60 or 68. Additionally, bus stops are located within an approximately 5 to 10 minute walk, providing a nearby transit option for accessing the project site. The project would not create a substantial demand for mass transit services above existing or planned capacity, nor would it interfere with existing or planned transit facilities. Therefore, impacts to transit would be **less than significant**.

### Bicycle Facilities

The City's Circulation Element does not provide specific bicycle facility designations; therefore, the following classes are used to identify bicycle facilities as identified in the Sonoma County Transportation Authority (SCTA) Countywide Bicycle and Pedestrian Master Plan (SCTA 2014):

**Class I (Shared Use Path or Bike Path)** A bikeway physically separated from any street or highway. Shared Use Paths may also be used by pedestrians, skaters, wheelchair users, joggers, and other non-motorized users.

**Class II (Bike Lane)** A portion of roadway that has been designated by striping, signaling, and pavement markings for the preferential or exclusive use of bicyclists.

***Class III (Bike Route)*** A generic term for any road, street, path, or way that in some manner is specifically designated for bicycle travel regardless of whether such facilities are designated for the exclusive use of bicycles, or are to be shared with other transportation modes.

Figure 3.17-1 shows the existing and proposed bicycle facilities per the SCTA Countywide Bicycle and Pedestrian Master Plan (BPMP). As shown in the figure, a Class II bike lane is currently striped along South Cloverdale Boulevard-, northeast of the project property, and along Foothill Boulevard, north of Sandholm Lane. Both bike lanes are proposed to extend to the south per the SCTA BPMP, with the proposed bike lane along South Cloverdale Boulevard extending down Dutcher Creek Road to Dry Creek Road, and the proposed bike lane along Foothill Boulevard extending to the Kelly Road located along the project property's southern boundary. The Baumgardner Ranch project to the north would construct the Class II bike lane along Foothill Boulevard upon completion of the Foothill Boulevard extension to the Kelly Road located along the project property's northern boundary, along with additional Class II bicycle facilities along Kelly Road north of the property.

The proposed project would not provide a Class II connection along Foothill Boulevard between Kelly Road (north) and Kelly Road (south) as anticipated by the SCTA BPMP; however, the construction of the Class II bike lanes along Kelly Road (north) would connect Foothill Boulevard with existing and proposed Class II facilities along South Cloverdale Boulevard/Dutcher Creek Road, consistent with the SCTA BPMP and Policy CE 3-1 of the City of Cloverdale General Plan Circulation Element to provide a connected network of bicycle infrastructure throughout the region. As such, the project would not disrupt or interfere with existing or planned bicycle facilities or conflict with adopted bicycle system plans or policies. Therefore, impacts to bicycle facilities would be **less than significant**.

### **Pedestrian Facilities**

Residential communities west of Foothill Boulevard and north of Treadway Drive serve as areas with active transportation users. The existing project property, along with land uses immediately east and north, primarily serve industrial, rural residential, and/or agricultural uses, with limited pedestrian accessibility and infrastructure. The nearest sidewalk facility is located along an approximately 500-foot stretch of the Renner Petroleum property frontage along South Cloverdale Boulevard. Foothill Boulevard and the residential streets west of Foothill Boulevard have all been constructed with curbs, gutters, and sidewalks. Additionally, the Baumgardner Ranch project would construct sidewalks along the extension of Foothill Boulevard, as well as a crosswalk across Kelly Road (north) at its terminus with South Cloverdale Boulevard, connecting the existing Renner Petroleum sidewalk to the Sonoma County Vintners Co-op property frontage. The project would not disrupt or interfere with existing or planned pedestrian facilities or conflict with adopted pedestrian system plans or policies. Therefore, impacts to pedestrian facilities would be **less than significant**.

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

CEQA Guideline Section 15064.3(b) identifies VMT as the most appropriate measure of transportation impacts under CEQA and defines VMT as "...the amount and distance of automobile travel attributable to a project...". It should be noted that "automobile" refers to on-road passenger vehicles, specifically cars and light trucks.

The City of Cloverdale has not released VMT specific thresholds or screening criteria; therefore, the Office of Planning and Research (OPR) 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) has been used in this analysis. Project trip generation and trip length estimates are provided below to support this analysis.

### **Trip Generation**

The Institute of Transportation Engineers' (ITE) *Trip Generation, 10th Edition* (ITE 2017) does not provide appropriate trip generation rates for the proposed CUSD South Fields project. Therefore, trip generation assumptions are based on the daily operations of the proposed users of the sports fields and review of the operations at similar District fields.

Trip generation estimates for the proposed CUSD South Fields project include the following assumptions, as determined in consultation with CUSD:

- CUSD team practices and games
  - 2 games per week, 8 months per year
    - 12 to 30 spectators per game
    - 22 players per team
  - Practices 3 days per week
    - 22 people per practice
- Community Use
  - Local soccer or little league
    - Practices 3 days per week
    - 22 people per practice
  - Informal use
    - Varying trip generation
  - No overlap with local soccer, little league, or CUSD athletic events

Based on the above assumptions, the proposed project could generate up to 124 daily trips during potential overlap of soccer and baseball seasons if both a soccer and baseball game were to occur on the same day, as shown in Table 3.17-1. However, overlap of soccer and baseball seasons would generally not occur as the soccer is a fall sport (August to November) and baseball is a spring sport (February to June) for all schools that complete with the District athletic programs.

Therefore, daily trips would generally be limited to community use (averaging 29 daily trips with varying informal usage), and either a District team baseball/softball or soccer game (averaging 62 daily trips) or practice (averaging 29 daily trips). Therefore, the highest trip generating events would occur on either a soccer or baseball/softball game day, with approximately 62 daily trips per event, accounting for carpooling between spectators and players and bus usage for away teams, as noted in Table 3.17-1 below. Typical use of the facility outside of game days two time per week would generally fall below 62 daily trips.

**Table 3.17-1. Daily Trip Generation Summary (District Team Use)**

Land Use	Size	Unit	Average Daily Trips (Games)					Average Daily Trips (Practices)		
			Home Players	Home Player Trips	Away Player Trips <sup>1</sup>	Spectator Trips <sup>2</sup>	Total Game Day Trips	Players	Total Practice Day Trips	Total Practice Day Trips w/Carpool <sup>3</sup>
Baseball Field	1	Field	22	44	1	8	62	22	44	29
Soccer Field	1	Field	22	44	1	8	62	22	44	29
<b>Total (Baseball/Soccer season overlap)</b>			<b>44</b>	<b>88</b>	<b>2</b>	<b>16</b>	<b>124</b>	<b>44</b>	<b>88</b>	<b>59</b>

**Notes:**<sup>1</sup> Assume 22 players per away team, and all away players are driven to the fields by bus.<sup>2</sup> 30 spectators are assumed to attend the average baseball or soccer game. It is further assumed that one spectator would accompany each home player (30 - 22 = 8 spectators).<sup>3</sup> A carpool factor of 1.5 assumed for players traveling to and from practices.**Trip Length Analysis**

The City of Cloverdale extends approximately 3 miles from its northern to southern extents. The athletic fields at Cloverdale High School, located in the northern area of the city, serve as the primary locations for existing District high school soccer and baseball games and practices. As shown in Table 3.17-2 below, the CUSD South Fields would be located approximately 2.5 miles south of the existing Cloverdale High School baseball and soccer fields. For residents in the southern portion of the City, trips to the existing Cloverdale High School fields average approximately 2.2 miles. As shown in the table and in Figure 3.17-2, trip lengths would be reduced to 1 mile or less with development of the CUSD South Fields project.

**Table 3.17-2. Trip Length Summary**

Location	Cloverdale High School Fields	CUSD South Fields
Cloverdale High School Fields	-	2.5
CUSD South Fields	2.5	-
Foothill Boulevard/Elbridge Avenue <sup>1</sup>	2.2	1.0 <sup>2</sup>

**Notes:**<sup>1</sup> Analysis location chosen to be representative of the average trip length originating at a residence in the southern portion of the City.<sup>2</sup> Extension of Foothill Boulevard to Kelly Road (north) will further reduce distance to the CUSD South Field project.

Although District high school sporting events will continue to occur at the Cloverdale High School athletic fields, the proposed project would provide an alternative site for practices and games. As such, the project would generally reduce trip lengths for southern Cloverdale residents by over 50% (when practice or games occur at the new field site), and would provide an alternative option for baseball and soccer fields to nearby residents who may otherwise travel to the existing high school fields. Additionally, upon completion of the Foothill Boulevard extension, pedestrian and cyclist trips to the fields would also be supported, with walking times averaging approximately 10 to 15 minutes for southern Cloverdale residents.



## OPR Screening Criteria

The OPR Technical Advisory suggests that agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing. The screening criteria relevant to the proposed CUSD South Fields project is the “small projects” threshold:

- **Screening Threshold for Small Projects** (110 daily trips or less): Although the project could generate up to 124 daily trips during the potential overlap of a CUSD baseball and soccer game, overlap of the two sport seasons is unlikely. Typical operations would average between 29 to 62 daily trips, as shown in Table 3.17-1. Therefore, the project **can be screened** out of further VMT analysis under this criterion.

Based on OPR’s guidance for screening thresholds for small projects, the project can be screened-out of VMT analysis since it would generate less than 110 daily trips during typical daily operations (generally ranging between 29 to 62 daily trips per Table 3.17-1). Additionally, based on an assessment of trip lengths associated with adding soccer and baseball fields in the southern area of the City, which currently lacks recreational field space, the proposed project would reduce trip lengths originally destined for the existing Cloverdale High School fields to the north. Therefore, based on the project’s land use, location, and daily trip generation, transportation impacts under CEQA would be considered **less than significant**.

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

Vehicular access to the site would be provided from South Cloverdale Boulevard, which extends north into the City of Cloverdale and south into Sonoma County. To the south, the road name changes from South Cloverdale Boulevard to Dutcher Creek Road south of Kelly Road. East of the project property and as it extends southerly, this road generally parallels U.S. Highway 101/State Route 128.

An existing unpaved private road on the north side of the project property, currently signed as Kelly Road, would be widened and paved as a public City of Cloverdale roadway with the development of the Baumgardner Ranch project to the north. This roadway would end adjacent to the western portion of the athletic fields and would intersect with another public roadway extending northerly through the Baumgardner Ranch project site as an extension of the existing South Foothill Boulevard. Another existing unpaved County road on the south side of the project property, also signed as Kelly Road, would be widened and paved as a public City of Cloverdale roadway with the proposed development of a separate project on the property south of the proposed CUSD South Fields property. This southern Kelly Road would provide access to the CUSD South Fields parking lot.

Additionally, there is sufficient line of sight at the Kelly Road (south) intersection with South Cloverdale Boulevard/Dutcher Creek Road to ensure safety at this intersection. Existing sight lines at the intersection are clear for more than the recommended corner sight distance of 550 feet, which is based on the posted speed limit. As the proposed project would not result in a substantial increase in vehicular traffic per the trip generation analysis provided above, the project would not create any safety hazards.

All improvements within the public right-of-way are required to comply with standards set forth by the City to ensure that the project does not introduce an incompatible design feature that would impede operations on adjacent local streets. Additionally, the proposed project would not conflict with planned roadway,

pedestrian, and bicycle improvements proposed in the Baumgardner Ranch Development project to the north. Therefore, impacts associated with hazardous design features would be **less than significant**.

**d) Would the project result in inadequate emergency access?**

Site access would be provided via Kelly Road (south). The site could also be accessed by emergency vehicles and responders from Kelly Road (north) and Foothill Boulevard upon its extension to Kelly Road with the development of the Baumgardner Ranch project. The project site would be accessible to emergency responders during construction and operation of the project. Therefore, impacts associated with an emergency response plan or emergency evacuation plan would be **less than significant**.

**Mitigation Measures**

No mitigation measures are required.

## 3.18 Tribal Cultural Resources

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

**Setting**

The analysis and mitigation measures in this section are based on the Cultural Resources Inventory Report prepared by Dudek for the project site, which is provided in Appendix D. The Native American Heritage Commission (NAHC) was contacted by Dudek on December 9, 2020 to request a search of the Sacred Lands File. The NAHC responded

on December 18, 2020 indicating that the search had identified Native American resources in the search area (comprised of the area within the 1 x 1 mile Section 7). Subsequent Native American outreach was attempted by letter (e-mail sent January 8, 2021) and phone for the project was made with NAHC-listed Tribal representatives. Representatives from the Graton Rancheria Tribe of Federated Indians (Graton Rancheria) responded, observing that the APE does not fall in this tribe's traditional ancestral territory. The Cloverdale Rancheria of Pomo Indians and the Mishewal-Wappo Tribe of Alexander Valley were identified by the NAHC as the group to be specifically contacted for additional information relating to the NAHC SLF search results, no response to Dudek outreach attempts (outside of Graton Rancheria) has been received by this tribe or others on the NAHC Contact list. Tribal correspondence documents are included in Appendix D.

The project property is currently undeveloped grassland and oak woodland which has been recently used for grazing and pasture. The eastern portion of the property contains gently sloping pastureland with an individual large oak tree as well as drainages that support scattered trees and riparian vegetation. The western portion of the property contains rolling hills that support oak woodland and grassland.

- a) ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***
- i) ***Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?***
  - ii) ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?***

No tribal cultural resources were identified as a result of consultation conducted in accordance with AB 52.

The NAHC responded on December 18, 2020 indicating that the search had identified Native American resources in the search area (comprised of the area within the 1 x 1 mile Section 7). Subsequent Native American outreach was attempted by letter (e-mail sent January 8, 2021) and phone. Graton Rancheria Tribe of Federated Indians responded, and stated that the APE does not fall in this tribe's traditional ancestral territory. No other tribes on the NAHC Contact List have responded to Dudek outreach attempts.

However, unanticipated discoveries of tribal cultural resources may occur during construction activities. Mitigation Measure CUL-1: Unanticipated Cultural Resources and Mitigation Measure CUL-2: Discovery of Human Remains would protect tribal cultural resources in the event of discovery. Therefore, the project would have a **less than significant impact with mitigation**.

## Mitigation Measures

Refer to Section 3.5, Cultural Resources, for MM CUL-1: Unanticipated Cultural Resources and MM CUL-2: Discovery of Human Remains.

## 3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Setting

Water is supplied to the City of Cloverdale via wells that draw from the Russian River and the City has sufficient water rights to meet existing and projected water demand (City of Cloverdale 2020). Wastewater is handled by the City's wastewater collection and treatment facility. Within the City of Cloverdale, Recology handles the collection and transport of solid waste. Potrero Hills Landfill is 94 miles and has a remaining capacity of 13,872,000 cubic yards; Vasco Road Sanitary Landfill is 127 miles away and has a remaining capacity of 7,379,000 cubic yards; and, Keller Canyon Landfill is 99 miles away and has a remaining capacity of 63,408,410 cubic yards. Electricity is provided by Sonoma Clean Power and natural gas is provided by PG&E.

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

The construction of facilities to support the construction of park facilities would require the extension of potable water, electric power, natural gas, and/or telecommunications lines to the project property and is considered part of the project analyzed throughout this Initial Study. Utility extensions would be within the overall project footprint and offsite construction of infrastructure would not be required other than trenching from the project property's eastern boundary to existing water and sewer lines in South Cloverdale Boulevard/Dutcher Creek Road.

The project would not result in any increase in population in the area and would not require a substantial increase in demand for water, wastewater, electrical power and natural gas; thus the project would require no new or expanded facilities to support adequate water service, wastewater treatment, electric power, natural gas, or telecommunications facilities. Thus, the project would have **no impact**.

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

The proposed project would not construct new residential, commercial or industrial land uses that would require large amounts of water. The project would require water supply to irrigate the athletic fields and other landscaping, as well as to serve the proposed restrooms. As shown in the City's 2020 UWMP, the City of Cloverdale would be able to accommodate water demand for the entire City during normal, dry, and multiple dry years up to the General Plan buildout date of 2040 (City of Cloverdale 2020). The addition of the water requirements of the proposed athletic facilities and restrooms does not represent a significant increase in water demand and would be consistent with the assumptions in the UWMP that additional institutional and recreational facilities would be developed to meet the needs of the projected population growth within the City. Thus, the project would have **no impact** on the City's water supplies.

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

The City of Cloverdale maintains its own wastewater treatment plant (WWTP). After annexation into the City of Cloverdale, the proposed project would connect to the existing City's wastewater facilities. The WWTP has a permitted dry weather capacity of 1.0 million gallons per day and operates at 0.53 million gallons per day. The project proposes the addition of two restrooms in the southern portion of the site. This would not result in a substantial increase in wastewater going to the City's WWTP and would be consistent with the City's anticipated increase in wastewater due to increases in the City's residential population. Therefore, the proposed project would have **no impact** on the City's WWTP.

- d) *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The project would construct new athletic fields and associated site improvements and would not require demolition of any existing structures. Soil removed during grading would be reused onsite. The proposed project does not propose land uses typically associated with a large volume of solid waste. The project will not add to the population of the area and will not increase demand for solid waste disposal such that new facilities would be required. All existing materials removed as part of the project would be repurposed or taken to a disposal facility with adequate permitted capacity to accept solid waste generated during operation. The project would comply with the Cloverdale Municipal Code Section 8.12.070 regarding collection, disposal, and processing of solid waste. Because the project would not exceed landfill capacity and would comply with all federal, State, and local statutes and regulations, the project would result in **no impact** associated with solid waste.

## 3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Setting

The proposed project property is within Sonoma County included in the State Responsibility Area for fire protection. The property is designated as being in a Moderate Fire Hazard Severity Zone (Calfire 2021). The project property is anticipated to be annexed to the City of Cloverdale as part of a separate development project anticipated to be proposed for the adjacent property to the south. After annexation, the property would be in a Local Responsibility Area and the Cloverdale Fire Protection District would have the primary responsibility for fire protection.

The area west of the project property is characterized by a northwest to southeast trending ridgeline with rolling to steeply sloped topography and dense tree cover. However, the property immediately west of the project property has been cleared of vegetation and supports a community land-based solar panel installation. This reduces the fuel load in the immediate vicinity of the project property.

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

As discussed in Section 3.9, response f), emergency vehicle access would be available to the proposed CUSD South Fields project from both the north and south sides of the property and the project site would be accessible to emergency responders during construction and operation of the project. The proposed project would not add population to the area and would not add a substantial number of vehicles to the area that could cause congestion that interferes with emergency access to the site, emergency response activities throughout the project area, or emergency evacuation. Therefore, the project would have **no impact** associated with impairment or interference with emergency response or evacuation.

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

As discussed in Section 3.9, response g), the proposed CUSD South Fields project would introduce human activity to the project property, which could increase the risk of wildfire ignition. While the risk would be minimal because the athletic fields would be irrigated and maintained, human activity that could increase risk would also occur within the dog park and outside of the fields. To prevent this increase in risk of fire ignition, Mitigation Measure HAZ-6: Wildfire Fuel Management requires vegetation management within and adjacent to the active use areas within the project site. Thus, the project's impacts associated with exacerbating wildfire risks would be **less than significant with mitigation incorporated**.

**c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

The proposed project would rely on an existing roadway for access and would not require the installation or maintenance of a road, fuel break, or emergency water source. Thus, the project would not exacerbate fire risk associated with construction or maintenance of such infrastructure and the project would have **no impact**.

- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The western portion of the project property contains a hill with slopes that range from rolling to steep and that supports an oak woodland community. The dog park included in the CUSD South Fields project is proposed to be located immediately north of this hill while the athletic fields included in the project are proposed to be located east of the hill. As noted above, the project property is designated as within a Moderate Fire Hazard Severity Zone (Calfire 2020). If a wildfire resulted in substantial burning of the oak woodland vegetation on this hill, there would be a potential for landsliding activity to affect the proposed dog park and athletic fields as well as to lead to sedimentation of the intermittent drainages within the property. However, the project does not propose any permanent occupation of the property. As an athletic field complex that would be used by District athletic programs and both formal and informal recreational activity by the community, the project site would be subject to short-term use on any particular day and such use could be curtailed if a potentially hazardous condition were to develop. Mitigation Measure WIL-1: Wildfire Hazard Remediation identifies protocols that the District would implement to ensure that potential hazards caused by a wildfire are addressed such that people within the project site are not exposed to significant risks. Thus, this impact would be **less than significant with mitigation incorporated**.

#### **Mitigation Measures**

Refer to Section 3.9, Hazards and Hazardous Materials, for MM HAZ-6: Wildfire Fuel Management.

- WIL-1**      **Wildfire Hazard Remediation.** In the event that the property is affected by a wildfire, the District shall consult with Calfire and/or the Cloverdale Fire Protection District to determine the degree to which the wildfire has affected the project property, including consideration of potential slope instability and potential hazards associated with tree health. If recommended by Calfire and/or the Cloverdale Fire Protection District, the District shall retain a qualified geotechnical engineer to evaluate soil and slope conditions of areas affected by wildfire activity, including wildfire that occurred adjacent to but not within the project property, and to recommend remediation activities for any identified hazardous conditions. Further, the District shall conduct public outreach and post signs around the perimeter of the property notifying the public that use of the fields is prohibited until the assessment and any necessary remediation activities are complete.



## 3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 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?***

As discussed in Section 3.4, Biological Resources, the project would have potentially significant impacts to special status plant and wildlife species and aquatic resources that would be reduced to less than significant levels with implementation of the mitigation measures identified in that section. Thus, with those mitigation measures incorporated in the project, the project would not cause substantial reductions in the habitat for, population of, or range of wildlife or plant communities.

As discussed in Section 3.5, Cultural Resources, there are no known examples of major periods of California history or prehistory within the project site. Mitigation measures are identified in that section to ensure that any unanticipated discoveries of cultural resources are appropriately assessed and managed to avoid

significant adverse impacts. Thus, with those mitigation measures incorporated in the project, the project would not eliminate resources important to understanding major periods of California history or prehistory.

As discussed in Sections 3.7 Geology and Soils, 3.9 Hazards and Hazardous Materials, 3.10 Hydrology and Water Quality, and 3.20 Wildfire, the project could result in potentially significant effects that may degrade the quality of the environment, but these impacts would be reduced to **less than significant with mitigation incorporated**, as identified in those sections. Thus, with those mitigation measures incorporated in the project, the project would not cause any significant degradation of the environment.

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

The project property is located at the south end of the City of Cloverdale. The proposed CUSD South Fields project would provide recreational facilities to support existing District athletic programs and support the recreational needs of the larger community. The cumulative development scenario for the project region consists of ongoing development and redevelopment within the City of Cloverdale and within Sonoma County, consistent with the County’s General Plan as well as the City’s General Plan and Urban Growth Boundary. The City’s Urban Growth Boundary includes the project property and the recently approved Baumgardner Ranch project on the property immediately north of the CUSD South Fields property, which is expected to include development of approximately 300 dwelling units.

As discussed throughout this Initial Study, the project would not result in substantial changes in many of the environmental resource areas considered, including aesthetics, air quality, energy, greenhouse gas emissions, land use and planning, mineral resources, population and housing, public services, recreation, transportation, and utilities and service systems. The project would either have no impact or a less than significant impact on these resources. Where a less than significant impact would occur, the effect would be limited to the direct effects of the project within the project site and would not combine with the effects from other projects in the region, thus these effects would not be cumulatively considerable.

As discussed in Section 3.2, Agricultural and Forestry Resources, the project would contribute to regional losses of agricultural land by rezoning approximately 18 acres of AR-B8 zoned land. However, this portion of the project property has limited opportunity for intensive agricultural use due to its topography and because this portion of the site is also designated with the Valley Oak Habitat Combining District, which restricts the removal of oak trees from the oak woodland present in this area. Thus, the loss of this small area of agriculturally zoned land from the County would not substantially reduce agricultural opportunities or activities within the County and the incremental effect of this project on County-wide agricultural production would not be cumulatively considerable.

The project would result in the loss of aquatic resources within the project site. It also has the potential to result in losses of special status plant species and cultural resources if any are encountered onsite during pre-construction surveys or during earth-moving activities. This Initial Study identifies several mitigation measures to ensure that the project’s effects to such resources are avoided, minimized, or offset through compensation. Thus, the project-specific direct impacts were found to be less than significant with mitigation incorporated, and the identified mitigation measures are sufficient to ensure that the project’s incremental effects are minimized or avoided and would not be cumulatively considerable. Further, other

development and redevelopment projects in the region would be subject to similar mitigation requirements to ensure compliance with local, state, and federal regulations which have been adopted with the intent of protecting biological and cultural resources.

Many of the potentially significant impacts of the proposed CUSD South Fields project in the areas of geology and soils, hazards and hazardous materials, and hydrology and water quality relate to the potential for soil erosion and water quality effects during project construction. This Initial Study identifies several mitigation measures to ensure that the project's effects in these areas are reduced to less than significant levels and do not contribute to regional degradation of water quality. Thus, the project-specific direct impacts were found to be less than significant with mitigation incorporated, and the identified mitigation measures are sufficient to ensure that the project's incremental effects are minimized or avoided and would not be cumulatively considerable. Further, other development and redevelopment projects in the region would be subject to similar mitigation requirements to ensure compliance with local, state, and federal regulations which have been adopted with the intent of avoiding significant cumulative impacts to water quality.

There are also several potentially significant impacts under the topics of Hazards and Hazardous Materials and Wildfire relating to potential exposure of individuals within the project site to hazardous conditions, particularly soil contaminants and effects of wildfire. These effects are site-specific and would not have any direct or indirect effects outside of the project site boundaries. Thus, they would not combine with effects from other development projects in the region and the project's effects would not be cumulatively considerable.

In conclusion, where the project has the potential to contribute to significant cumulative impacts in the project region, the project's direct effects would be lessened with implementation of mitigation measures identified in this Initial Study such that they would not combine with impacts of other projects in the region and thus all of the project's potential contributions to cumulative impacts would be **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?***

Sections 3.1 through 3.20 of this Initial Study provide an analysis of potential environmental impacts of the proposed project, including adverse effects on human beings. Mitigation measures to avoid, minimize, or compensate for potential impacts identified are included in Section 3.9, Hazards and Hazardous Materials, and Section 3.20, Wildfire. Thus, the project's potential to cause adverse effects on human beings would be **less than significant with mitigation incorporated**.

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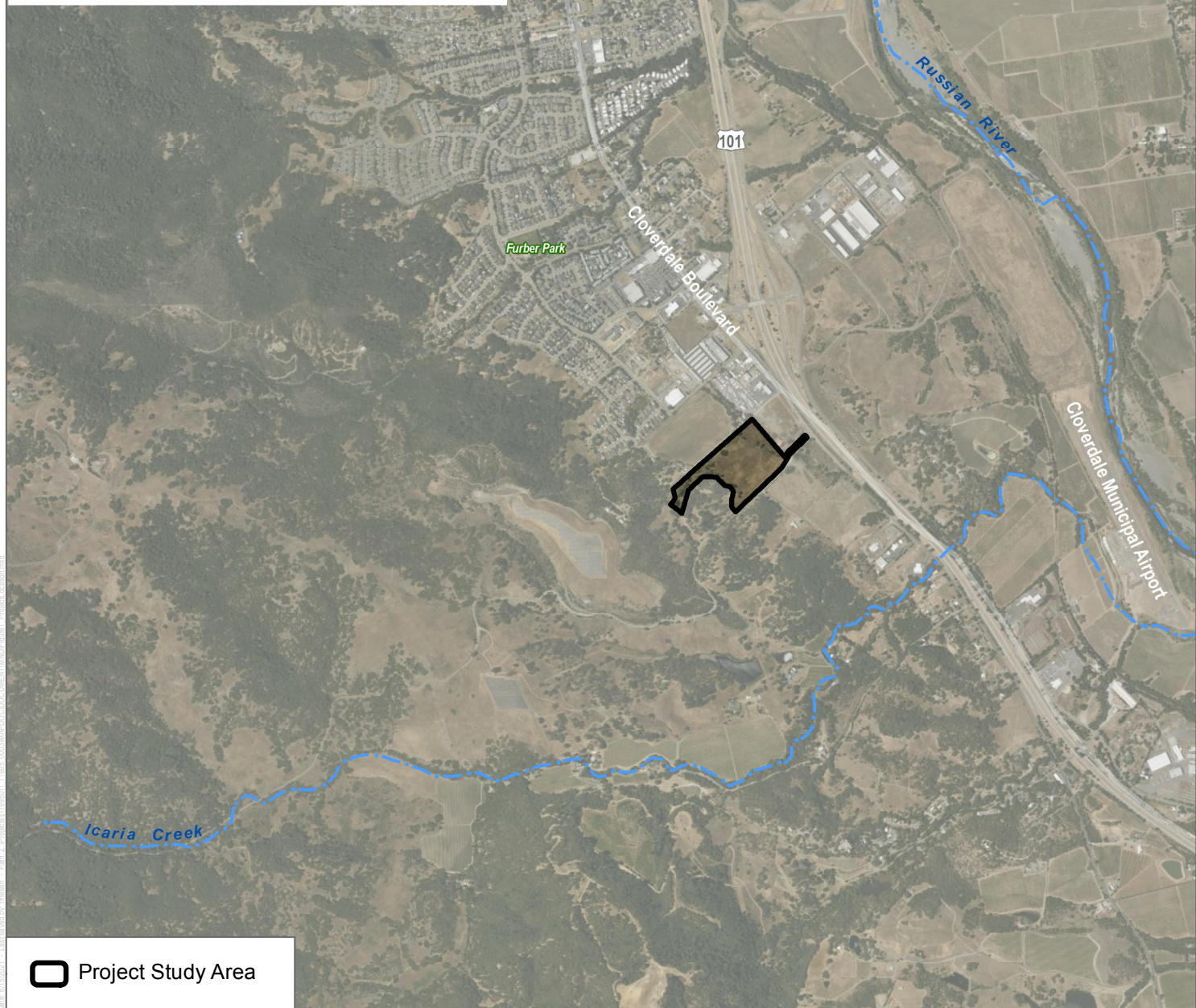
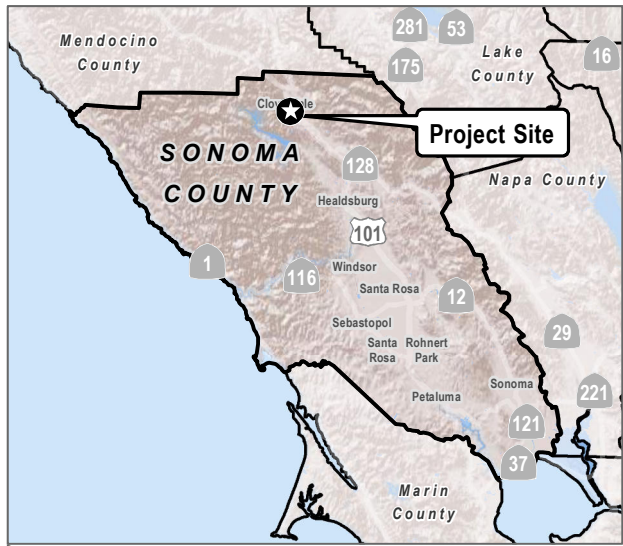
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## 4.2 List of Preparers

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 Project Study Area

SOURCE: Bing 2020

**DUDEK**



0 1,000 2,000  
Feet

**FIGURE 1**

**Project Location**

CUSD South Fields Project

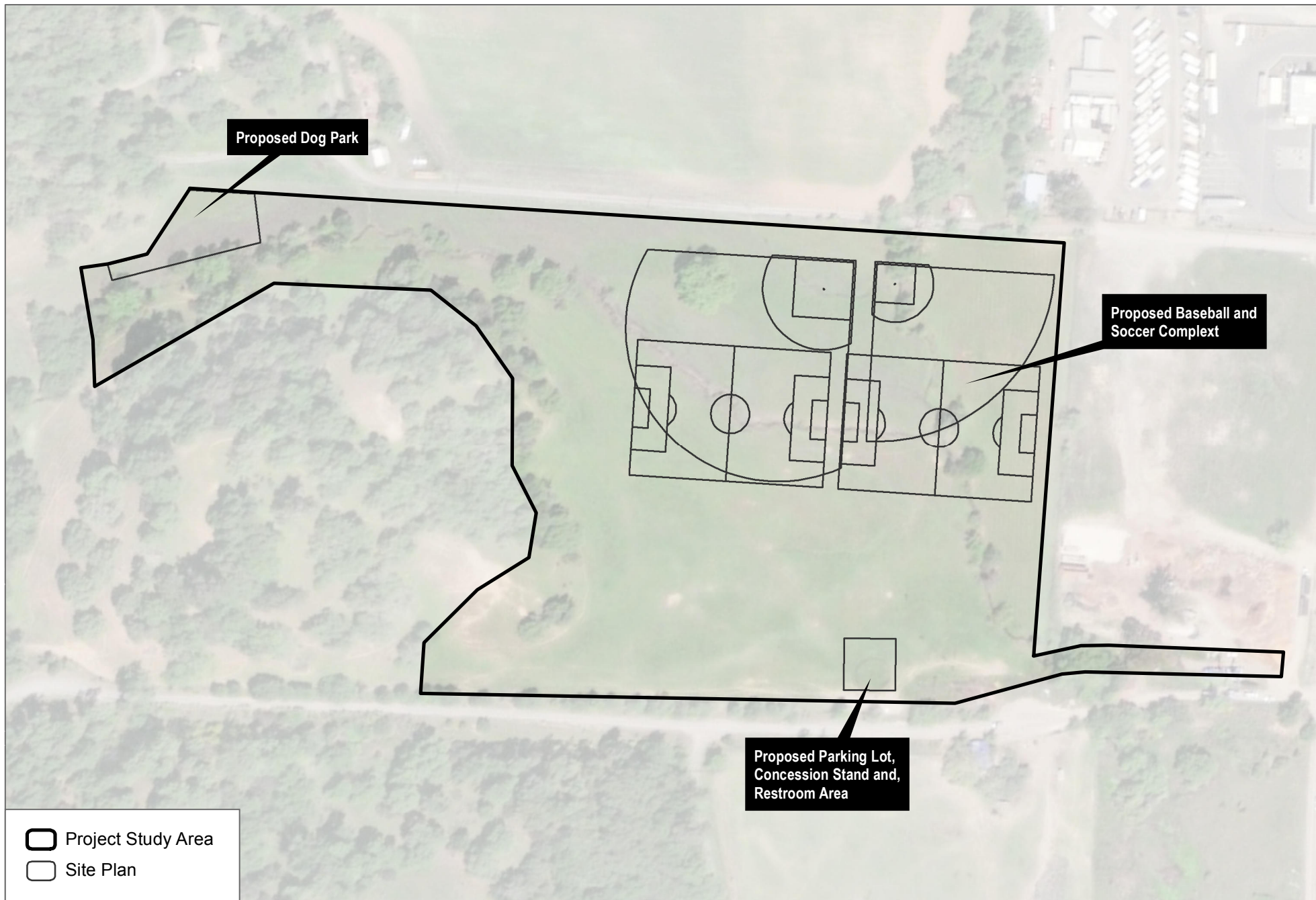
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**FIGURE 3**  
**Proposed Site Plan**  
 CUSD South Fields Project

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Photo 1: Site view from northeast corner.



Photo 2: Southeasterly site view from northern property boundary.



Photo 3: Dog park area.



Photo 4: Site view from southwest corner.

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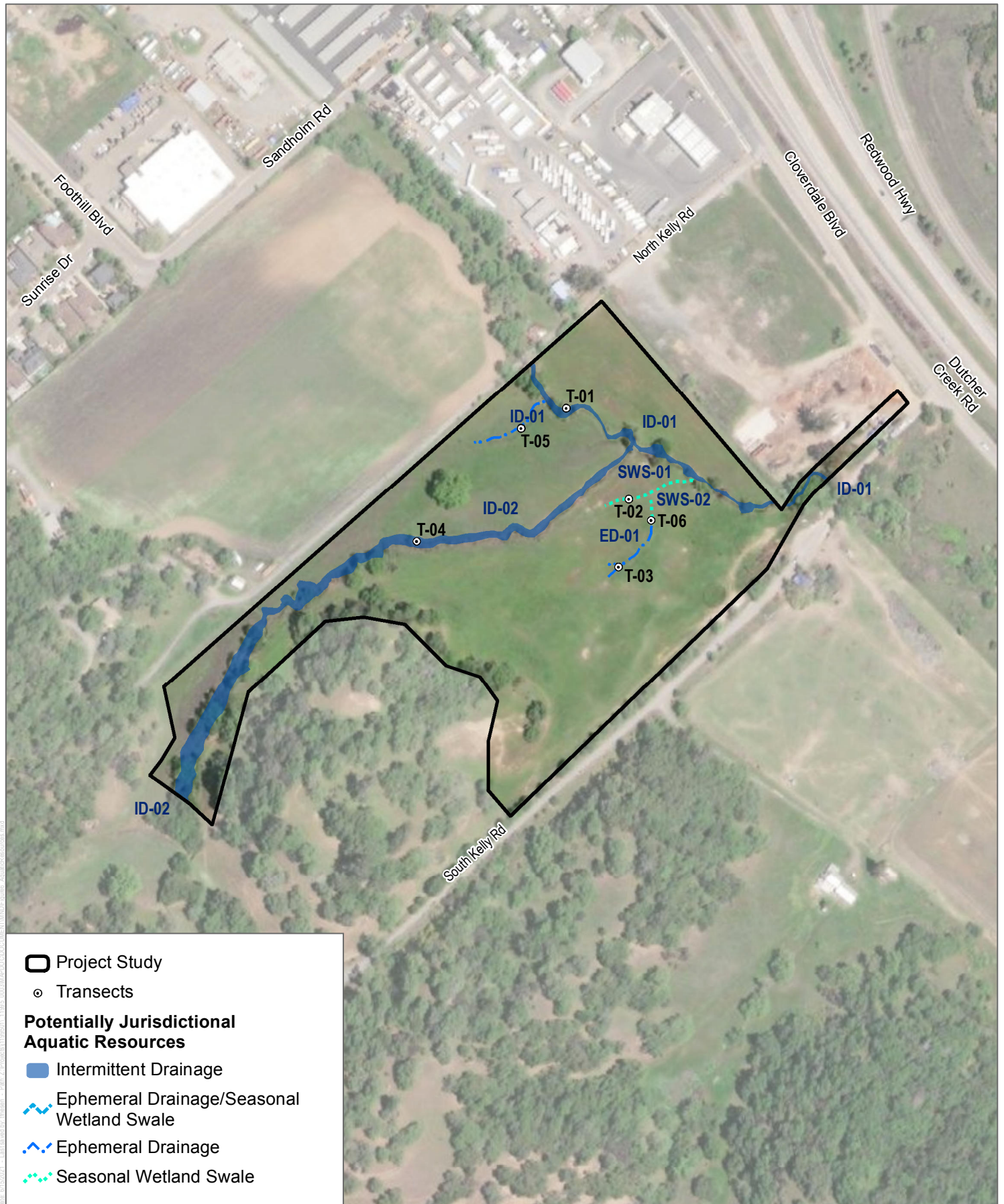
**FIGURE 5**

Vegetation Communities and Land Cover Types

CUSD South Fields Project

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**FIGURE 6**

Preliminary Jurisdictional Delineation of Aquatic Resources

CUSD South Fields Project

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